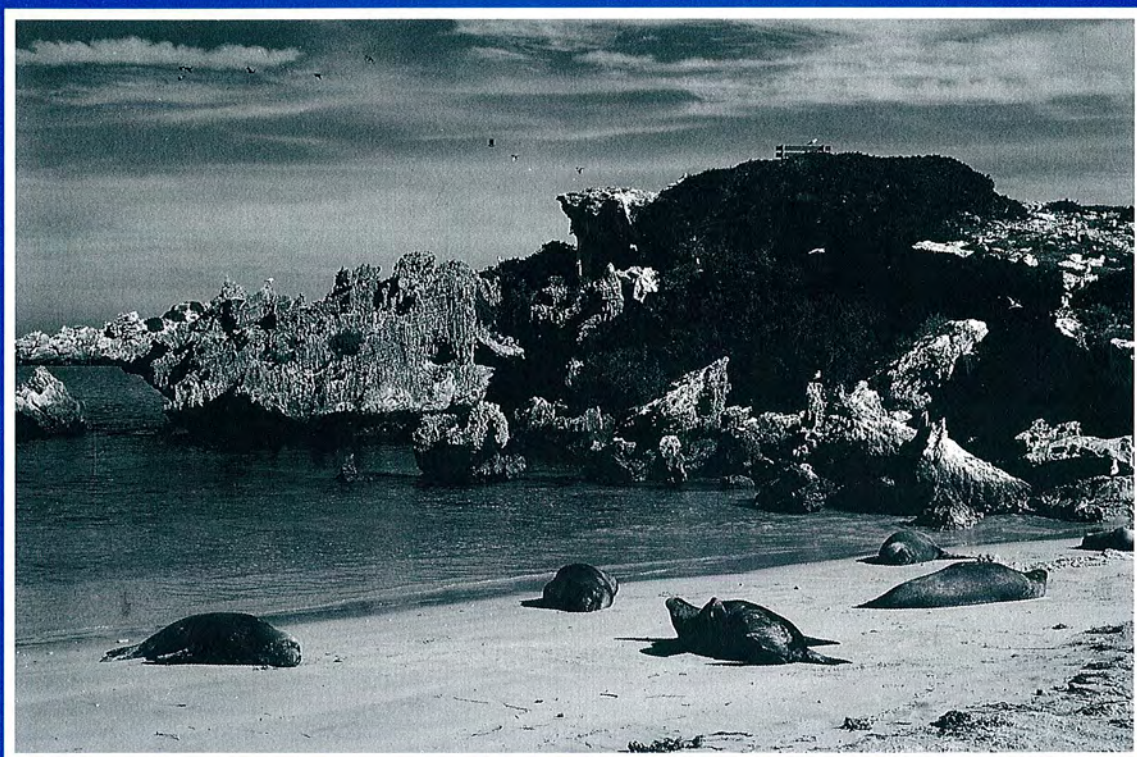


Shoalwater Islands

Analysis of Public Submissions



MANAGEMENT PLAN No 21



Department of Conservation
and Land Management



National Parks and Nature
Conservation Authority

Shoalwater Islands

Analysis of the Public Submissions to the
Draft Management Plan

1992



Prepared by Kate Orr and Alan Clarke

Department of Conservation and Land Management
for the
National Parks and Nature Conservation Authority

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INTRODUCTION

This document analyses submissions to the Draft Management Plan (DMP) for Shoalwater Islands. Comments have been detailed to the section of the DMP to which they refer.

The Shoalwater Islands DMP was released for public comment on 7 November 1990 by the Hon. Minister for the Environment, Mr R J Pearce, MLA. The plan was available for comment for a period of two months to 11 January 1991. However, all submissions received after this date were accepted. All submissions have been summarised and changes have been made to the plan where appropriate.

Following the release of the plan, advertisements were placed in local and Statewide newspapers advising that the DMP was available for comment. The DMP was distributed to State Government departments, tertiary institutions, conservation and recreation groups, local authorities, libraries and numerous individuals. Copies of the plan were available for perusal at the City of Rockingham and at several libraries. The plan was available for purchase from CALM's State Operations Headquarters, and Crawley Office.

ANALYSIS OF PUBLIC SUBMISSIONS

Method of Analysis

The public submissions to the Shoalwater Islands Draft Management Plan were reviewed in three stages:

- Public submissions were summarised to allow analysis;
- The submissions were assessed using the criteria below;
 1. The draft management plan *was* amended if the submission:
 - a) provided additional resource information of direct relevance to management;
 - b) provided additional information on affected user groups of direct relevance to management;
 - c) indicated a change in (or clarified) Government legislation, management commitment or management policy;
 - d) proposed strategies that would better achieve management goals and objectives; or
 - e) indicated omissions, inaccuracies or a lack of clarity.
 2. The draft management plan was *not* amended if the submission:
 - a) clearly supported the draft proposals;
 - b) offered a neutral statement, or no change was sought;
 - c) addressed issues beyond the scope of the plan;
 - d) made points which were already in the plan, or had been considered during plan preparation;
 - e) indicated strongly opposing views with the existing strategies providing a preferred management option; or
 - f) contributed options which were not feasible (generally due to conflict with existing legislation, Government or department policy).

- The DMP was reviewed and amended where necessary. Minor editorial changes referred to in the submissions have also been made.

Comments made in submissions have been assessed entirely on the cogency of points raised. No subjective weighting has been given to any submission for reasons of its origin or any other factors which would give cause to elevate the importance of any submission above another.

Number and Origin of Submissions

Most submissions were 'substantial', with only one petition being received. The number and place of origin of submissions are listed below.

	Number	Percent
CALM	5	9
Community Organisations	6	11
Government (Local)	1	2
Government (State)	12	21
Individuals	26	46
Industries	<u>6</u>	<u>11</u>
	<u>56</u>	<u>100</u>

A list of submitters to the Shoalwater Islands Draft Management Plan is given in Appendix 1.

ANALYSIS TABLE

The Analysis Table contains:

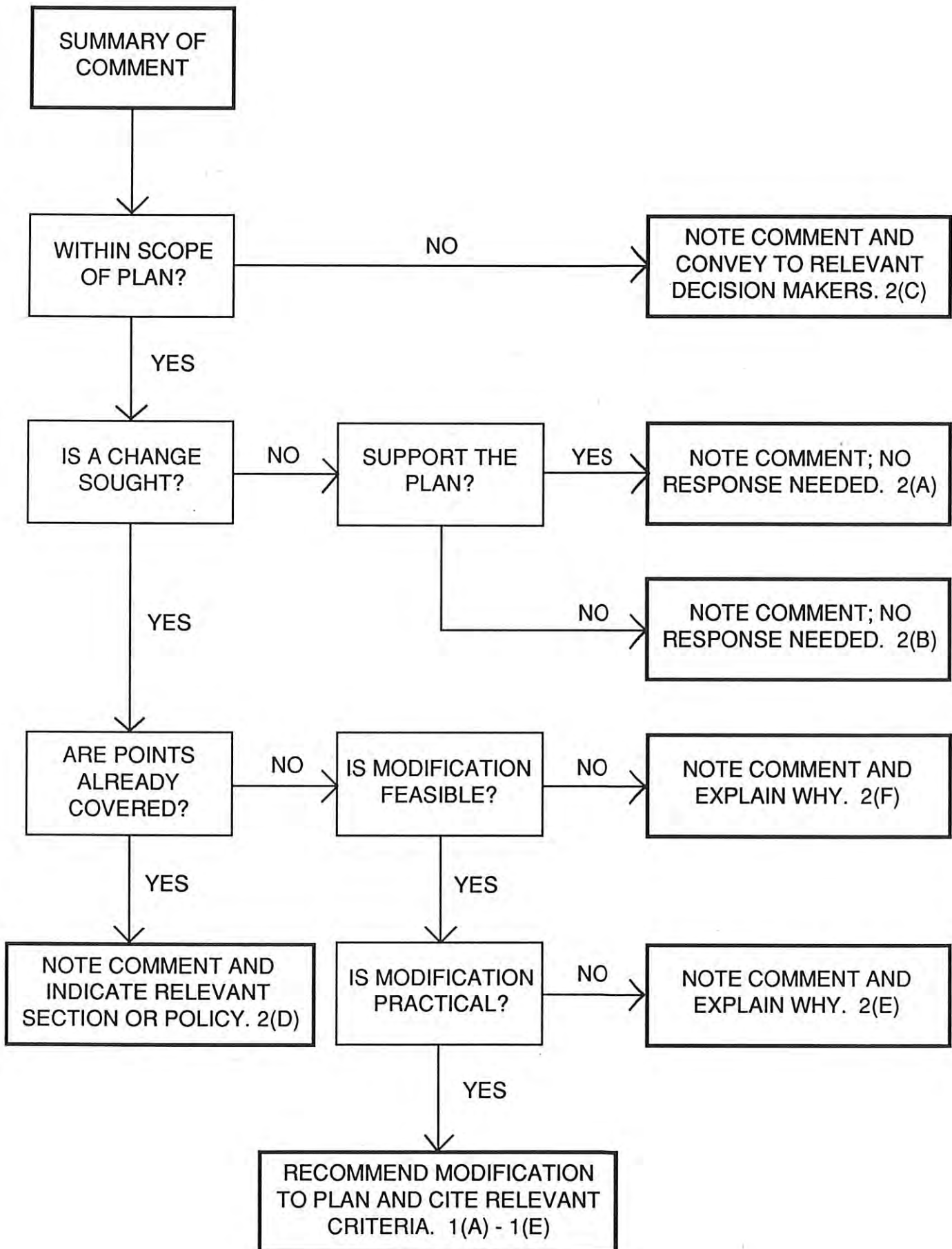
- The number of different comments made about each section of the Draft Plan;
- A summary of each comment made on the Draft Plan;
- The number of submissions received on each comment;
- An indication whether or not the comments resulted in a amendment to the Final Plan;
- A discussion on why the comment did not result in an amendment to the Final Plan or an indication of what action was taken in the Final Plan; and
- The criteria by which each comment was assessed.

NOTE:

DMP refers to the Draft Management Plan

FMP refers to the 'Final' (revised) Management Plan

ANALYSIS PROCESS



COMMENT NUMBER	SUMMARY OF COMMENT TO DRAFT MANAGEMENT PLAN	NO. OF SUBS	FMP AMENDED	DISCUSSION / ACTION TAKEN IN FMP	CRITERIA
	OVERALL COMMENTS				
1	Supported the general ideas in the plan.	8	No	Supported Draft Management Plan.	2a
2	The document is clear and concise and addresses the majority of the biological/conservational issues for the area.	1	No	Supported Draft Management Plan.	2a
3	The document is admirably brief and clear containing some excellent recommendations.	2	No	Supported Draft Management Plan.	2a
4	The Shoalwater plan is an excellent document with great attention to detail.	1	No	Supported Draft Management Plan.	2a
5	Supports all recommendations for the Shoalwater Islands including those that relate to the marine environment.	2	No	Supported Draft Management Plan.	2a
6	Believes the Draft Management Plan is factually accurate and has reached the appropriate recommendations concerning fauna.	1	No	Supported Draft Management Plan.	2a
7	The plan reflects the local concern about the sensitivity of the natural environment of the area.	1	No	Supported Draft Management Plan.	2a
8	The plan is both informative and comprehensive.	1	No	Supported Draft Management Plan.	2a
9	Conservation is the main issue in the management of the Islands.	1	No	No change sought.	2b
10	The plan compromises the well being of the wildlife by allowing continued unsupervised access.	1	No	Conservation is the primary goal. It is considered that use is compatible with the primary goal. Refer to Sections 19.1 and 19.2 in the FMP for specific detail.	2d
11	Public input should have been included in the early stages of the planning process. The planning team should not have relied only on the Advisory Committee, but also consulted the 50 000 - 70 000 public that use the Island annually.	1	No	In addition to the Advisory Committee there is ongoing monitoring of public use.	2b
12	Will the public be able to comment again before the final plan is released.	1	No	No the Draft Management Plan is revised in light of public comments. The Final Management Plan and Analysis of Public Submissions (this document) are produced and available as public documents for sale.	2c

COMMENT NUMBER	SUMMARY OF COMMENT TO DRAFT MANAGEMENT PLAN	NO. OF SUBS	FMP AMENDED	DISCUSSION / ACTION TAKEN IN FMP	CRITERIA
13	The plan was too large, it could have been condensed down for easier reading. The price and size would have turned most people off buying it.	1	No	It is a difficult task to balance minimising the size of the plan while providing sufficient information to justify decisions. A summary was provided at the beginning of the DMP and a key issues booklet was available free of charge.	2d
14	Day visitors and tourists will be the principal providers of revenue to the islands. It is essential therefore that the views and wishes of the tourism industry should be carefully considered when preparing the management plan.	1	No	Considered in preparation of the Draft Management Plan.	2d
1	SUMMARY Piii: Supports goals.	1	No	Supported Draft Management Plan.	2a
1	1. OVERVIEW P3: Supports CALM'S attitude to the values of the Shoalwater Islands.	1	No	Supported Draft Management Plan.	2a
2	P3: Supports environmentally sensitive management, however do not forget tourist potential.	1	No	The tourism values are acknowledged. They are considered within the range of values and the overall context of the plan.	2b
1	2. INDEX TO RECOMMENDATIONS No comments.	1	Yes P9	Editorial change made to Final Management Plan.	1e
2	3. PURPOSE AND TENURE P9, point 2: "Shoalwater Island Nature Reserve" delete "of" after compromising.	1	No	Supported Draft Management Plan.	2a
3	P9, Background: Supports the amalgamation of the four reserves and VCL into the Shoalwater Islands Nature Reserve.	1	No	Changing the purpose to Conservation Park gives conservation the primary goal (as opposed to Recreation) and thus give greater protection to these values. Zoning is a management tool and is applied according to the purpose and values of the area.	2a, 2b
4	P9, Background: Suggest combining Penguin Island and the surrounding marine areas into one "Shoalwater Conservation Park".	1	No	Conservation Park applies to land areas only. Island management will be integrated with Marine Park management.	2c

COMMENT NUMBER	SUMMARY OF COMMENT TO DRAFT MANAGEMENT PLAN	NO. OF SUBS	FMP AMENDED	DISCUSSION / ACTION TAKEN IN FMP	CRITERIA
5	P9, Background: Support the change of purpose of Penguin Island to Conservation Park.	4	No	Supported Draft Management Plan.	2a
6	P9 Background: The aims of a conservation park can be achieved by controlling access rather than excessively restricting it.	1	No	It is considered that this has been achieved. This level of detail is considered in sections 19.1 and 19.2 access to and on Penguin Island in the FMP.	2d
7	P9, para 9: The definition of Conservation Park is ambiguous, is recreation less important than conservation?	1	No	Conservation is the primary management goal. Conservation Parks are similar to National Parks however less 'important'.	2d
8	P9, para 10: Supports Penguin Island retaining its A class reserve status.	1	No	Supported Draft Management Plan.	2a
9	P10, Rec 1: Suggests that Penguin Island be extended to the LWM.	1	Yes P10	Plan amended accordingly.	1a
10	P10, Rec 1: Opposed to the change of purpose of Penguin Island to Conservation Park. Conservation Parks do not have any standing in law, nor acceptable definition. Concern that recreation activities threaten the conservation of the Island.	1	No	Since the draft plan was released the CALM Act has been amended to include conservation parks. Conservation is the primary goal.	2d
11	P10 Rec 3: The remaining islands could become part of the proposed Marine Park so that they can be incorporated and managed as the one reserve.	1	No	Management of all Islands and the Marine Park will be integrated. The purpose of nature reserve compared to Marine Park (surrounding waters) and Conservation Park (Penguin Island) reflects the values and level of access to these areas.	2d
12	P9 point 1: Class A reserve 17070 is vested with power to lease in the National Parks Board. The reserve excludes reserve 11954 of about 0.45 of a hectare set aside in 1909 for the purpose of 'Trig Station'.	1	No	Vesting in the National Park Board equates to vesting in the National Parks and Nature Conservation Authority. Plan amended accordingly.	2d
13	P9 point 2: Class 'A' reserve 24204 extends to the low water mark, not the high water mark.	1	Yes P9	Information updated.	1a
14	P9 point 2, 3,4: Class 'A' reserves 24204, 31893 and 31894 are vested with the NPNCA.	1	No	Already noted in background information in Draft Management Plan.	2d

COMMENT NUMBER	SUMMARY OF COMMENT TO DRAFT MANAGEMENT PLAN	NO. OF SUBS	FMP AMENDED	DISCUSSION / ACTION TAKEN IN FMP	CRITERIA
15	P10, Changes in area or purpose of class 'A' reserves are subject to an act of parliament, co-ordinated by the Department of Land Administration.	1	No	Already noted in background information in Draft Management Plan.	2d
16	P10. Supports recommendations.	1	No	Supported Draft Management Plan.	2a
1	4. POLICIES AND GOALS P11: Supports policies and goals.	1	No	Supported Draft Management Plan.	2a
	5. TENURE OF SURROUNDING WATERS AND ADJACENT LAND				
1	P12, Objective: Supports the objective and consultation between agencies.	1	No	Supported Draft Management Plan.	2a
2	P12, Supports the recent establishment of the Shoalwater Marine Park.	1	No	No change sought.	2b
3	P12 Point 1: Marine Park legislation should ensure that the Port Kennedy development does not affect the seagrass beds of Shoalwater Bay and Wambro Sound.	1	Yes P12	Information added regarding the Environmental Protection Authority (EPA). The EPA may assess the environmental acceptability of developments which, if approved are subject to conditions. The primary goal for Marine Park management is conservation. CALM will liaise with adjacent land managers.	1e
4	P12 Point 1: Supports the need for preservation and protection of foraging grounds.	1	No	No change sought.	2b
5	P12 Point 2: Marine Park legislation should strictly limit power boats.	1	Yes PP11, 14	Information was added to the text to clarify the purpose of, uses allowed in and responsibilities of other agencies in the Marine Park. Specific issues will be addressed in a management plan for the Marine Park and are beyond the scope of this plan. All marine park concerns will be brought to the attention of the CALM manager of the marine park and where appropriate, the other responsible agencies. A new action has been included regarding the need to inform the community of the presence, values and appropriate use of the marine park.	1e

COMMENT NUMBER	SUMMARY OF COMMENT TO DRAFT MANAGEMENT PLAN	NO. OF SUBS	FMP AMENDED	DISCUSSION / ACTION TAKEN IN FMP	CRITERIA
6	P12 Background: Concern for the safety of the penguins in the surrounding waters from the increasing numbers of power boats in Wambro Sound, particularly with the development of the Port Kennedy project.	1	Yes P11	See comments 3 and 5.	1e
7	P12 Background: Concern that the proposed very significant increase in sewerage outfall from Cape Peron and Becher Point will effect the ecology of the island and surrounding waters.	1	Yes PP11, 13	CALM have consulted the Water Authority of WA (WAWA) concerning this issue. Information was added to text and the need for liaison with the WAWA was added to Actions 2 and 4 in the FMP.	1e
8	Recommends communication with the EPA and WAWA with regards to any sewage planning.	1	Yes P11	See comments 3 and 7.	1a
9	P13, Para 2: Other approvals, apart from environmental, are required before work can be undertaken on the Port Kennedy proposal.	1	No	This is acknowledged, CALM is concerned with environmental issues.	2d
10	P14, Rec 2: Recommends that a representative from the Department of Marine and Harbours be included on committees that are to determine action in the maritime zone.	1	No	This level of detail is considered in plan implementation when the committee is established. The Dept of Marine and Harbours is considered a key player in Marine Park management.	2c
11	P14, Rec 3: Concern about whether the proposed development of Mersey Point will go ahead.	1	No	Mersey Point is the responsibility of the City of Rockingham. CALM is providing as much assistance as possible to the City of Rockingham as the development of Mersey Point is considered very important to the successful management of the Islands and Marine Park. CALM (and other players) are advising the City of Rockingham on the location, design and type of facilities.	2c
12	P14 Rec 3: Supports the development of Mersey Point as an information facility for the area. The development should include upgrading parking and toilets, appropriate signs, good access and a kiosk.	1	No	Supported DMP. The 'nature' of the development, including all of these suggestions, is being considered by the City of Rockingham, in liaison with CALM.	2a
13	P14 Recs 1-4: Due to apparent funding shortages a separate plan for the Marine Park seems inappropriate.	2	No	The Islands DMP was close to complete when the Marine Park was established. The marine park management plan has complex issues that will take some time to resolve and thus it was decided to continue the Islands DMP separately.	2d

COMMENT NUMBER	SUMMARY OF COMMENT TO DRAFT MANAGEMENT PLAN	NO. OF SUBS	FMP AMENDED	DISCUSSION / ACTION TAKEN IN FMP	CRITERIA
14	P14 Recs 4 and 6: Supports both recommendations.	1	No	Supported Draft Management Plan.	2a
15	P14 Recs 4 to 6: Believes that these recommendations have not been considered in the past and will continue to be avoided in the future for example, Secret Harbour and Port Kennedy.	1	Yes P11	See comment 3.	1e
16	P14 Rec 6: Support communication with developers of the Port Kennedy Project to ensure it does not conflict with or endanger the conservation issues of the Park.	1	No	Supported Draft Management Plan.	2a
17	P14, Recs: Concern that access to the shallow reefs around Penguin Island will not be permitted for the pursuits of fishing diving and harvesting of abalone.	1	Yes P11	See comment 5.	1e
18	P14, Recs: Concern about damage to abalone structures caused by over fishing.	1	Yes P11	See comment 5.	1e
19	P14 Recs: Abalone fishing should be totally prohibited on the reef around Penguin Island.	1	Yes P11	See comment 5.	1e
20	P14, Recs: Prohibit jet skis in the area.	4	Yes P11	See comment 5.	1e
21	P14 Recs: Spearfishing is incompatible with conservation.	1	Yes P11	See comment 5.	1e
22	P14 Recs: Future developments along the coastal mainland represent a great threat to the marine fauna of the area. Suggested recommendation: "No marinas and no further jetties be constructed within the Marine Park; extra launching ramps if required."	1	Yes P11	See comment 3.	1e
23	P66 Recs: There is a need for a Kiosk/toilet facility on the mainland.	1	No	See comment 11.	2c
24	P65: Suggested recommendation. 'Establish 200 m wide "no go" area for all commercial fishing vessels around all islands in the chain.	1	Yes P11	See comment 5. This will be considered when developing the zoning scheme during preparation of the Marine Park management plan.	1e
25	P72: Ensure better availability of natural feed supplies for the Penguins by restricting fishing in their feeding areas.	1	Yes P11	See comments 5 and 24.	1e

COMMENT NUMBER	SUMMARY OF COMMENT TO DRAFT MANAGEMENT PLAN	NO. OF SUBS	FMP AMENDED	DISCUSSION / ACTION TAKEN IN FMP	CRITERIA
26	P12 Background: Concern about CALM's apparent desire to have full ownership/management of the whole Shoalwater area, possibly resulting in restrictions on sailboarding, surfing, fishing, and abaloning.	1	Yes P11	See comment 5.	1e
27	P12 Background: Recreational activities appear to have a much stronger impact on the marine environment than commercial activities. For example: • seals hit by surf boards • Penguins entangled in disgarded fishing lines • Penguins hit by propellers.	1	Yes P11	See comment 5.	1e.
28	P14 Recs: Collecting dead sea shells should be limited. 70 000 visitors annually pose a threat to the future.	1	Yes P11	See comment 5.	1e
29	P14: Additional recommendation. "Prohibit taking of live marine fauna within the 200 m 'no go' area surrounding each island".	1	Yes P11	See comment 5.	1e
30	P14 Recs: Suggests a dive trail for SCUBA divers.	1	Yes P11	See comment 5.	1e
31	P14 Recs: Provide information on good snorkelling and dive areas as at Hillarys.	1	No	This will occur as a component of marine park management.	2c
32	P14 Recs: Ban all spear fishing within 200 m of the Islands.	1	Yes P11	See comment 5.	1e
6. ZONING					
1	P15 Background: Supports zoning of the Shoalwater Islands under section 62 of the CALM Act, particularly the special conservation zones.	1	No	Supported Draft Management Plan.	2a
2	P15: Believes the 12 ha area of Penguin Island is too small to accommodate both special conservation zones and recreation activities and that Penguin Island is no less sensitive than the other Islands.	2	No	The plan's primary goal is conservation, it is considered that the restrictions applied on visitor use ensure compatibility with this goal.	2e
3	P16 Para 1: Supports the view that a recreation zone is a conservation area within which recreation is allowed.	1	No	Supported Draft Management Plan.	2a
4	P16 Recs: Penguin Island should be zoned special conservation with all visitors controlled by guided tours.	1	No	See comment 2. Access to/on Penguin Island is considered in detail in sections 19.1 and 19.2 in the Final Management Plan.	2e

COMMENT NUMBER	SUMMARY OF COMMENT TO DRAFT MANAGEMENT PLAN	NO. OF SUBS	FMP AMENDED	DISCUSSION / ACTION TAKEN IN FMP	CRITERIA
5	P16 Recs: Supports recommendations.	1	No	Supported Draft Management Plan.	2a
6	Figure 2: Concern that the special conservation zone is fragmented and not extensive enough to cover the Little Shearwater nesting area.	1	No	The location of burrows will be considered when the site development plan is prepared during implementation of the Final Management Plan. Access on the tombolo area will be above habitat and is only permitted in designated areas. Refer to sections 19.1 and 19.2 for specific detail.	2d
7	Figure 2: Concern about the apparent restricted access to the south eastern beach.	1	No	Access along this beach was provided in the Draft Management Plan and still is in the Final Management Plan, see figure 2.	2d
8	Figure 2: Supports proposed zoning areas.	2	No	Supported Draft Management Plan.	2a
9	Figure 2: There is a conflict with recreation zone over shearwater nesting sites. However, they breed in winter which co-incides with the closure of the Island.	1	No	See comment 6.	2d
1	7. PRINCIPAL CONSERVATION DIRECTIONS P21 Conservation Strategy: The encouragement of sea birds to utilise nesting sites in certain protected areas is not practical. It is not possible to determine what makes a good nesting site for a particular sea bird.	1	Yes P19	Reference to this issue was deleted from the conservation strategy due to its specific nature, however retained in Section 8 (Action 8 in the Final Management Plan). The need for research was added to the strategy.	1e
2	P21: Recommends research into encouraging sea birds to nest into specific nesting sites.	1	Yes P19	See comment 1.	1e
3	P21: Support conservation directions. 8. FAUNA	1	No	Supported Draft Management Plan.	2a
1	P22 Para 1: Agrees that the high conservation of the Shoalwater Islands is due to the fauna they support.	1	No	Supported Draft Management Plan.	2a

COMMENT NUMBER	SUMMARY OF COMMENT TO DRAFT MANAGEMENT PLAN	NO. OF SUBS	FMP AMENDED	DISCUSSION / ACTION TAKEN IN FMP	CRITERIA
2	P22 Background: The Penguins are very sensitive to disturbance. The Penguins at Philip Island are in significant decline, only 20% of capable breeding pairs produce offspring, the colony is extremely isolated. The breeding season extends most of the year. The Penguins are most vulnerable during moulting season which is in the summer.	1	Yes P20	Information incorporated into text of Final Management Plan.	1a
3	P24 Para 3: Supports the view that "Penguin Parades" are not feasible on Penguin Island.	1	No	Supported Draft Management Plan.	2a
4	P24 Para 5: Beach games should be prohibited on Penguin Island because the sea bird breeding habitat extends to the beaches.	1	No	Further restrictions are not considered necessary. Access along beaches is provided.	2e
5	P25 Para 3: Feeding of seals may lead to aggressive behaviour in the future.	1	Yes PP 22, 57	This issue is of concern. The need for appropriate behavior towards wildlife was added to Action 4 in this section and section 20, of the Final Management Plan.	1e
6	P26 Rec 2: Periodic patrols of the islands by CALM staff will not suffice.	1	No	This is subject to the availability of resources and continual assessment.	1e
7	P26 Rec 2: There is a need for a permanent ranger all year, with the assistance of other rangers and volunteers during peak periods.	1	No	See Comment 6.	1e
8	P26 Rec 2: Enforcement of the CALM Act by rangers and wildlife officers has to be part of educating the public.	1	No	Supported DMP. Considered in recommendation 2, in the Draft Management Plan (Action 2 in the Final Management Plan).	2a, 2d
9	P26 Rec 2: Recommends that the northern end of Penguin Island, where many Bridled Terns nest, be closed to the public due to frequent disturbance, and appropriate signs provided.	1	No	Most of this area is closed to access with the exception of beach access along part of the eastern beach. Temporary restrictions if needed are provided for (See section 19.2, Access on Penguin Island).	2d
10	P26 Rec 4: Public education programs are an obvious way to inform the public of the island's conservation value.	1	No	Supported DMP, considered in recommendation 4, in the Draft Management Plan (Action 4 in the Final Management Plan).	2a, 2d
11	P26 Recs: Proposed recommendation "Increase penalties for offences within the Park".	1	No	Beyond scope of Plan. Penalty rates are assessed continually.	2c, 2f

COMMENT NUMBER	SUMMARY OF COMMENT TO DRAFT MANAGEMENT PLAN	NO. OF SUBS	FMP AMENDED	DISCUSSION / ACTION TAKEN IN FMP	CRITERIA
12	P26 Recs: Supports all recommendations. 9. VEGETATION	2	No	Supported Draft Management Plan.	2a
1	P30 Rec 4: Correct "take the seeds from the island on (not from) which seedlings are to be planted".	1	Yes P28	Editorial change made.	1e
2	P30 Recs: Supports recommendations. 10. GEOLOGY, GEOMORPHOLOGY, SOILS AND EROSION	1	No	Supported Draft Management Plan.	2a
1	P32, 33 Recs: Supports recommendations. 11. ABORIGINAL HISTORY	1	No	Supported Draft Management Plan.	2a
1	P34: Suggest that local aboriginal people should be contacted as part of the planning process.	1	Yes P31	Incorporated (Action 4 in Final Management Plan).	1b
2	P34 Recs 1 and 2: Supports recommendations.	2	No	Supported Draft Management Plan.	2a
3	P34 Recs: Suggests an additional recommendation "conduct an archaeological and ethnographic survey prior to any ground disturbance."	1	No	Surveys will be encouraged.	2d
	12. EUROPEAN HISTORY				
1	P35: Suggests retaining, for historical reasons, one of the buildings, for example the research building or present information centre.	1	No	Buildings are not in keeping with their surrounds or functional.	2e
2	P35: Exotic trees are part of the European History of the Island. They should be left where they provide shade and only be removed where they have become pests. This particularly applies to the Norfolk Island Pines.	1	Yes PP32, 33	Acknowledgement of the European history aspect of these species has been incorporated in this section. Section 13, Weeds and Planted Species has also been amended.	1c
3	P35: Historical points of interest need investigating and restoring not only on Penguin Island.	2	No	Supported DMP, considered in recommendation 1 in Draft Management Plan (Action 1 in Final Management Plan).	2a, 2d

COMMENT NUMBER	SUMMARY OF COMMENT TO DRAFT MANAGEMENT PLAN	NO. OF SUBS	FMP AMENDED	DISCUSSION / ACTION TAKEN IN FMP	CRITERIA
4	P35: It is important to recognise the historical aspect of Penguin Island, such as Seaforth McKenzie's old well. 13. WEEDS AND PLANTED SPECIES	1	No	Supported DMP, considered in recommendation 1 in Draft Management Plan (Action 1 in Final Management Plan).	2a, 2d
1	P36 Background: Supports the removal of non-indigenous and weed species on a progressive basis.	2	No	Supported DMP. The DMP was amended to allow for retention of non-indigenous species that do not have a detrimental impact on the conservation values of Penguin Island.	2a
2	P36 Para 3: Melaleuca lanceolata should be retained for shade. They are indigenous to nearby islands.	3	Yes P33	Text amended in Final Management Plan. Will be retained as a shade tree if suitably located.	1d
3	P36 Last para: Concern that native trees planted for shade will take many years to grow.	1	Yes P33	This will be considered when species are selected during preparation of the site development plan. Recommendation 6 was amended to allow for use of non-indigenous species if absolutely necessary subject to stringent assessment (Action 6 in Final Management Plan).	1d
4	P36 Background: Weeds and planted species have little or no impact on declared plants either on the islands or the nearby mainland.	1	No	No change sought.	2b
5	P37 Rec 1-5: Supports the weed control policy.	2	No	Supported Draft Management Plan.	2a
6	P37 Rec 6: Supports the removal of Pines.	2	No	Supported Draft Management Plan. See comment 1.	2a
7	P37 Rec 6: Supports removal of non-indigenous trees, this will assist with the re-establishment of the natural communities.	1	No	Supported Draft Management Plan. See comment 1.	2a
8	P37 Rec 6: Recommends an education program to explain the reasons for the removal of non-indigenous trees.	1	No	Supported DMP, considered in recommendation 6 in the Draft Management Plan (Action 6 in the Final Management Plan).	2a, 2d
9	P37 Rec 6: Concern that the pines will be removed before there are adequate replacement shade trees.	1	Yes P33	Non-indigenous species will only be removed if they have a detrimental impact on the conservation values of Penguin Island.	1a
10	P37 Rec 6: Concern about the ability of Acacia cyclops and Melaleuca lanceolata to provide adequate shade and aesthetic acceptance.	1	Yes P33	See comment 3.	1d

COMMENT NUMBER	SUMMARY OF COMMENT TO DRAFT MANAGEMENT PLAN	NO. OF SUBS	FMP AMENDED	DISCUSSION / ACTION TAKEN IN FMP	CRITERIA
11	P37 Rec 6: Concern about the removal of Pine and fig trees. They provide shade and are part of the Islands history.	1	Yes P33	See comment 9. Information added to Final Management Plan noting possible historic value.	1a
12	P37 Rec 6: Opposed to the removal of the fig trees. They should be made a feature of the island.	1	Yes P33	See comment 9.	1a
13	P37 Recs: Opposed to the removal of non-indigenous plants or trees.	2	Yes P33	See comment 9.	1a
1	14. PEST SPECIES P38 Background: Domestic and native species need to be defined separately. Silver gulls should not be classified as pest species.	2	Yes P34	Text reworded to emphasize that Gulls are indigenous species however considered as pests due to their unnatural proliferation associated with the increased availability of food.	1e
2	P38 Para 2: Pigeons should not be culled, but controlled by improving grain handling techniques.	2	No	Both limiting the food source and culling pigeons will be used to decrease numbers. The numbers of pigeons are continuing to increase at a very rapid rate and constitute a major threat to conservation values.	2d
3	P38 Para 2: Opposed to the culling of Silver gulls. Culling of adults and destroying eggs and chicks are labour intensive, (expensive), unethical and ineffective. Research shows that culling programs must continue for 3 to 4 years before numbers drop noticeably. Breeding numbers rebound quickly once culling is reduced or stops. Silver Gull numbers have increased solely due to increases in availability of human waste. Only 17% of diet samples analysed contained natural food items.	2	Yes P34	Text revised to highlight that Gulls are indigenous, limiting the food source, the reason for unnatural proliferation, is the best means of control, control is a sensitive issue and requires stringent procedures, and the nuisance factor is not a valid reason for control.	1e
4	P38 Background: The only effective long term control measure for Silver Gulls is to limit food by tip closure or modification.	3	Yes P34	See comment 3.	1e
5	P38: The increasing numbers of Silver Gulls are a threat to other sea birds in the area. Action to reduce their numbers is needed before they further diminish the food chain of the Fairy Penguins. Suggests using licensed shooters.	1	No	Supported Draft Management Plan.	2a
			No	Limiting the food source is the best means of control. The level of detail of techniques which will be used is too specific for the plan and subject to further investigation.	2d
6	P38 Background: Silver Gulls are not just feeding at rubbish tips.	1	Yes P35	Recommendation amended to include targeting other food sources (Action 1 in Final Management Plan).	1a

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7	P38: Observations on Bird Island suggest Pigeons also feed on weeds.	1	No	No change sought, comment acknowledged.	2b
8	P38: Bird pests and household pets on the Shoalwater Islands have no additional impact on declared animal programs on the adjacent mainland.	1	No	No change sought, comment acknowledged.	2b
9	P39 Recs 1-3,6: Educate the public about the need to reduce the numbers of Silver Gulls.	1	No	Supported Draft Management Plan.	2a
10	P39 Recs 1-3,6: Eliminate tip sites to help control Silver Gulls. Suggest also the neutralization process.	1	No	Supported DMP. CALM will liaise with managers of landfill sites.	2a
11	P39 Rec 5: Suggest liaison with Transperth or whoever has control of the Rockingham Bus Station, as pigeons regularly nest in the roof.	1	Yes P35	Recommendation 5 amended to provide for liaison and other relevant managing agencies in addition to CBH (Action 3 in Final Management Plan).	1a
12	P39 Rec 5: Apart from grain spillage control, has the use of poisons or contraceptives been practiced on pigeons at CBH?	1	No	This specific level of detail is considered in plan implementation. All techniques will be investigated.	2c
13	P39 Recs 4-6: Recommends that pigeons be culled by trapping or shooting. The use of poisoned grain has had adverse effects on other wildlife which consume the grain.	2	No	See comment 13. To date shooting is favoured. Concern regarding use of poisoned grain is noted.	2c, 2d
14	P39 Rec 7: Suggests closing the dog beach on the mainland. Dogs have been seen, unattended, at Mersey Point trying to cross the sand bar.	1	No	This beach is under the management jurisdiction of the City of Rockingham. CALM will liaise with this authority about this potential problem.	2c
15	P39 Rec 7: Suggests a combination of signs and heavier fines to combat the problem of pets on the island.	1	No	Signs are in use. The size of the fine is continually assessed.	2a, 2c
16	P39 Recs: Feral animals must be prevented from reaching the island, they are a threat to the islands sea bird population.	1	Yes P34	Text and recommendation amended to include feral animals, generally (Action 7 in Final Management Plan).	1a
17	P39 Recs: Support the recommendations for controlling the populations of Silver Gulls and pigeons. This will make a significant contribution to the conservation of the native fauna.	1	No	Supported Draft Management Plan.	2a
18	P39 Recs: The public should be made aware that large sea bird colonies are rarely accessible. Interpretation material should be provided outlining the uniqueness of the Silver gulls.	1	Yes P34	Information and Action added in recognition of the interpretive potential of this seabird colony (Action 5 in Final Management Plan).	1a

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19	P39 Recs: Supports recommendations.	2	No	Supported Draft Management Plan.	2a
	15. FIRE				
1	P42: What islands will be burnt? The impact of fire on the resident wildlife should be acknowledged.	1	Yes P38	Text reworded, recommendation 1 and 3 deleted and 2 amended due to lack of clarity. All lighting of fires is prohibited unless proven beneficial by research, however this research should occur elsewhere.	1a, 1e
2	P42 Rec 2: Suggest the use of electric coin operated BBQs to prevent fire risk.	1	No	This is precluded due to the type of activity.	2d
3	P42 Rec 3: How precisely is a "fire research program" going to be instigated?	1	Yes P38	See comment 1.	1a, 1e
4	P42 Rec 3: Fire Research input to such a small and discrete area should be a very low priority in view of massive problem areas elsewhere on CALM estate.	1	Yes P38	See comment 1.	1a, 1e
5	P42 Rec 4, 5: These recommendations require rewording. Prevention and suppression are two separate aspects of fire planning.	1	Yes P38	Recommendation 4 reworded (Action 2 in Final Management Plan).	1e
6	P42 Recs: A fire control emergency system is needed.	1	No	Supported DMP. This is considered imperative.	2a
	16. MINING				
1	P43: The plan does not indicate that not only has Alcoa agreed to surrender a portion for lease ISA, it has lodged the surrender documents with the Dept of Mines. The documents are being held in escrow pending amendment of the CALM Act to provide for a category of land to be known as Conservation Park.	1	Yes P39	Background information reworded to emphasize this. Legislative amendments are still required.	1a, 1e
2	P43 Para 3: Coverage of the Shoalwater Islands by the special lease ISA does not imply any intent by Alcoa to gain access to the islands.	1	Yes P39	See comment 1.	1a, 1e
3	P43, Para 3: Alcoa has agreed to surrender a portion of the lease so that the islands will no longer be within the lease.	1	Yes P39	See comment 1.	1a, 1e

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4	P43 Rec 1: Supports recommendation. Need for more protection than the current Government policy.	1	No	Supported Draft Management Plan.	2a
5	P43 Rec 1: Supports recommendation.	1	No	Supported Draft Management Plan.	2a
1	17 PRINCIPAL RECREATION DIRECTIONS				
1	P47 Overall Objectives: Concerned that the daytime recreational activities of the research students clash with the recreational objectives for more passive activities.	1	No	Researchers are subject to permit.	2d
2	P47 Rec Strategy: There is insufficient indication of the recreational pursuits which may not be permitted in the proposed recreational zone.	1	No	This level of detail is too specific for a strategy	2d
3	P47 Rec Strategy: Ball games are neither compatible with the conservation purpose of the island, nor with the emphasis on more passive recreation.	1	No	See comment 2.	2d
4	P47: There is no statement of the current recreational facilities on Penguin Island.	1	No	See comment 2.	2d
	18. ATTRACTIONS AND EXISTING VISITOR USE				
1	P48 Para 6: Penguin Island is too small to cope with peak crowds in summer. The public has to be encouraged to use the beaches on the mainland for bathing and playing games.	1	No	Overall visitor management is considered in relation to impacts on conservation values and the visitor experience. Refer to goals (section 4) and recreation strategy (section 17).	2b
2	P48: The main attraction on Penguin Island are the Penguins and on Seal Island the main attraction are seals.	1	No	No change sought.	2b
3	P48: The plan does not examine the different types of visitors, and their needs, in detail. They include the short stop over trips from bus tourists, smaller groups and families, educational and community groups, and active recreationalists.	1	Yes P44	Text amended.	1b
4	P48: Facilities eventually provided on Penguin Island should cater for both short and more extended visits.	1	Yes P44	Text amended.	1b

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5	P48: Overuse of Penguin Island will need to be monitored. Control measures such as barriers, railed walkways and signs should not spoil the natural appearance of Penguin Island.	1	No	Monitoring is conducted continually. Refer to section 24, Research and Monitoring. The visual impact of facilities is considered in site development plans prepared during implementation of the Final Management Plan.	2d
	19. PENGUIN ISLAND				
	19.1 Access to Penguin Island				
1	P50 Background: Visitors numbers should not be reduced without attempting imaginative management techniques that streamline visitation patterns.	1	No	Agree. This is the basis for visitor management.	2d
2	P50: Stresses the importances of retaining public access to the island because it is the only such island in the vicinity.	1	No	This is acknowledged and considered in preparation of the DMP.	2d
3	P50 Background: CALM is condoning a dangerous practise, by suggesting that walking across the sandbar is part of the Penguin Island experience.	1	Yes P46	Text amended to reflect that visitors (not CALM) may consider this part of their experience.	1b
4	P50 Para 6: Boats should not be allowed in the shallow water around the island if wildlife are put at risk.	1	Yes PP46, 47	Text and recommendation amended. A preferred access route will be allocated and delineated. This will be considered in more detail in the marine park management plan (Action 5 in Final Management Plan).	1a, 1d
5	P50,51: The use of the ferry service should be encouraged as the preferred access to Penguin Island, as opposed to the more dangerous access via the sandbar. The public must be educated on the dangers of the sandbar.	3	Yes P47 No	Recommendation 1 amended to include encouraging use (Action 1 in Final Management Plan). Supported DMP. Recommendation 3 (Action 3 in Final Management Plan).	1b 2a
6	P51: Should provide a ferry on a small fee basis. The commercial ferry is very expensive for low income families.	1	No	This level of detail is beyond the scope of the plan. The fee is regularly reviewed with reference to the need for a regular ferry service and it's commercial viability.	2c

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7	P51 Rec 1: Suggested recommendation, "Continue to permit the operations of the ferry and tour service within the bay, and foster strong and healthy liaison between CALM officers, volunteers and the service operator.	1	Yes P47	Recommendation 2 amended to include regular liaison and assistance in training where possible (Action 2 in Final Management Plan).	1d
8	P51 Recs 1,4,5: Supports proposals, but should be carried out in accordance with the Jetties Act.	1	Yes PP46, 47	Text amended to reflect need for liaison with the Department of Marine and Harbours on such issues.	1c
9	P51 Rec 3: Close access to the Island by the sandbar.	1	Yes P47	Access to the Island will be continue to be monitored. Access by the sandbar will be reviewed in a management plan for the Marine Park. Restrictions such as limiting the numbers of visitors may be imposed if necessary. (Action 8 in Final Management Plan).	1a, 1b
10	P51 Rec 4: A shelter is needed on the jetty at Penguin Island. It should be aesthetically acceptable and able to be removed during Island closure.	1	Yes P47	Recommendation 4 reworded to reflect this need (Action 4 in Final Management Plan).	1b
11	P51 Rec 5: Anchoring area has to be sandy, or will result in further loss of seagrass. Mooring buoys should be provided to be used strictly between dawn and dusk.	1	No	This level of detail will be considered in implementation of the plan.	2c
12	P51 Rec 6: Opposed to the closure of Penguin Island during the winter months unless it is essential for protecting the fauna.	2	Yes PP46, 47	Text and recommendations amended to allow controlled access for interpretive tours with CALM approved guides, subject to the impact on wildlife and availability of resources during the 'closure'. Fees will be imposed. This provides visitors with special opportunities, emphasizes the sensitive nature of Penguin Island and reduces pressure to open the Island (Action 6 in Final Management Plan).	1d
13	P51 Rec 6: Opposed to recommendation. Suggested alternative, "Penguin Island to be open to the public twelve months of the year, with the exception of maintenance and 'clean up' periods as required. These to be adequately advertised and explained."	1	Yes PP46, 47	See comment 12.	1d
14	P51 Rec 6: Suggest to read "Investigate ways of keeping the island open during laying/breeding season." Sensitive design and construction of the raised boardwalks should provide adequate control.	1	Yes PP46, 47	see comment 12.	1d

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15	P51 Rec 6: Closure of Penguin Island during the winter months would not be necessary if visitor access was controlled. Visitors could be channelled through the interpretation facility and along the boardwalks. This could only be achieved with proper and realistic staffing levels.	2	Yes PP46, 47	see comment 12.	1d
16	P51 Rec 6: The closing of Penguin Island during the winter months creates problems for tour operations. Boardwalks over Penguin nesting sites would protect the chicks from the public. Breeding time would be of immense interest to the public.	2	Yes PP46, 47	see comment 12.	1d
17	P51 Rec 6: Special guided tours during the breeding season should be considered. The breeding season would be of great interest to tourists.	1	Yes PP46, 47	see comment 12.	1d
18	P51 Rec 6: During the winter months the services could shut down, including the ferry service, to discourage visitors, however allow the few who enjoy the island in winter.	1	No	Access will be allowed by guided interpretive tour only. See comment 12.	2d
19	P51 Rec 6: Supports recommendation. Closing Penguin Island during the winter months will contribute significantly to the conservation of the natural fauna.	1	No	Supported Draft Management Plan. See also comment 12.	2a
20	P51 Rec 6: Need for a permanent presence on the Island to enforce the winter closure.	1	No	This is not considered necessary, particularly given the future CALM presence at Mersey Point and resource constraints (Refer to Section 25, Priorities, Funding and Staff for more detail).	2d
21	P51 Rec 6: Active recreationalists continue to visit Penguin Island during the closed winter months. They are not monitored due to the lack of a resident ranger.	1	No	CALM staff presence is subject to available resources and is assessed continually.	2c
22	P51 Rec 6: Partial, seasonal closure of Penguin Island is not practicable. There is no 'off season' for seabirds. During summer non-breeding Penguins moult and Bridled Terns breed.	1	No	In addition to the closure, further site specific access restrictions can be imposed.	2c
23	P51 Rec 8: Supports recommendation. Disabled access would also benefit the elderly and parents with young children in prams.	1	No Yes PP46, 47	Supported DMP. Text and recommendation amended to emphasise importance of opportunities for the disabled (Action 7 in Final Management Plan).	2a 1b

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24	P51 Recs: Supports recommendations.	4	No	Supported Draft Management Plan.	2a
25	P51 Recs: The public should be allowed to use the ferry as a return journey only. Signs at Mersey Point should indicate the dangers of crossing the sandbar at high tide and suggest using the ferry.	1	No	This is allowed. CALM will liaise with the City of Rockingham regarding signs on Mersey Point (Refer to section 22.0).	2d
26	P51 Recs: Public access to Penguin Island should be prohibited except for supervised interpretive tours. This would protect the flora and fauna which can be adequately viewed from a boat. A full time ranger would be required.	2	Yes PP46, 47	See comments 12 and 22. Public access when the Island is open will be controlled and monitored (new Action 8 in Final Management Plan). Conservation is the primary goal.	1d
27	Recs P51: The proposed increase in human disturbance reinforces the view to limit unsupervised access at all times. Data appears to show that breeding numbers of Penguins in areas of human visitation is significantly lower than in unvisited areas.	1	Yes PP46, 47	See comment 26.	1d
28	P51 Recs: Jetties and landing places are required to be licensed. Use is controlled under the conditions of the license.	1	Yes PP46, 47	See comment 8.	1c
29	P51 Recs: Suggested recommendation, "advise vendor that advice to the public which creates a belief that the bar is safe to traverse on foot, is unacceptable, and request restraining action by the Rockingham City Council against the vendor if such advice continues to be given."	1	No	Beyond scope of plan.	2c
30	P53 Recs: Conduct supervised educational tours on the island as a control to limit public access.	1	Yes PP46, 47	See comment 26.	1d
31	P57: The number of visitors to Penguin Island should be restricted especially on peak days. The island is too small and the ecosystem too fragile to support great numbers.	1	Yes P47	Text amended and action added (Action 8 in Final Management Plan). Restrictions, such as limiting the number of visitors on peak use days, may be imposed if necessary.	1b
32	P48 Rec 4: Access to the Island across the sand bar needs to be controlled to avoid over crowding. Short guided group visits would make it possible to deal with large numbers of visitors per day.	1	Yes P47	See comment 31.	1b

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	19.2 Access on Penguin Island				
1	P52 Strat: Supports concept of raised or aligned walk tracks over nesting sites. Enables visitors to experience Penguins in their natural habitat without interfering with them.	3	No	Supported Draft Management Plan.	2a
2	P53 Para 3: Present railings are no more visually intrusive than raised walk ways.	1	No	Boardwalks will be at the same height as the vegetation.	2d
3	P53 Para 4: Access needs to be strictly controlled by policing the walk trails and providing guided tours.	1	No	A range of techniques will be used to control visitors including appropriately designed and located facilities and access, in addition to patrols by CALM staff and guided tours.	2d
4	P53 Para 4: Access should be limited to the beaches and existing walk trails.	2	No	To give visitors greater direction and interpretive opportunities, which will assist in wildlife protection, access is along beaches, mostly existing walk trails, with the exception of the realignment of part of the southern walk trail, and boardwalks on the tombolo area.	2d
5	P53 Recs: Supports recommendations.	2	No	Supported Draft Management Plan	2a
6	P53 Rec 2: Supports recommendation.	1	No	Supported Draft Management Plan	2a
7	P53 Rec 2: Provision for lighting on the boardwalks should be made to view Penguins at night.	1	No	'Penguin parades' are not supported or feasible. Refer to section 23, Information Interpretation and Education for detail.	2d
8	P53 Rec 2: Concern that the raised boardwalk and realignment of the southern walk trail cuts through prime Penguin breeding areas and will lead to severe disturbance.	2	Yes P49	Consultation occurred with concerned submitters on site and the access amended. Further consultation would occur when the site development plan was prepared and specific details determined.	1a

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9	Map 6b: Support boardwalks. Enables visitors to experience Penguins in their natural habitat without interfering with them. Concern about the proposed placement of the boardwalks over nesting sites.	1	Yes P49	See comment 8.	1a
10	P53 Rec 5: Support lowering the rails on most walk ways, especially where dense vegetation deters people from leaving these paths.	1	No	Supported Draft Management Plan.	2a
11	P53 Rec 5: A decrease in the height of fencing would encourage people to cross over these boundaries. Suggest a second, lower slat be added to the existing rails.	1	Yes P49	Recommendation amended to specify that lowering of fencing should occur only after walk trails are upgraded and trial removal of fencing was deleted. The existing defined routes have been very successful in guiding access however their surface often makes walking difficult. Once these are upgraded it is considered low fencing will be adequate to guide access and is also visually much more acceptable. Support rails will be used where essential. The height and materials used for fencing will be determined during the plans implementation in a site development plan.	1b, 1e
12	P53 Rec 5: Concerned about removal of rails around the southern lookout. Reasons: • rails support people on steep climbs • rails used for camera supports • Brushwood can be strategically placed to reduce the visual impact of the rails.	1	No	Comments are noted. The specific design of the southern lookout will be considered during implementation of the plan, including visitor control and visual impact.	2c
13	P53 Rec 5: Opposed to lowering rails. Reason: • plant species such as Tetragonia decumbens can grow over rails to reduce visual obtrusiveness.	1	Yes P49	See comment 11	1b, 1e
14	P53 Rec 5: Opposed to removal of railing. Reason: • the railing offers an added reminder in controlling visitors and their children.	1	Yes P49	Recommendation 5 amended. Some form of fencing will be retained (Action 6 in Final Management Plan).	1a, 1b, 1d
15	P53 Rec 5: Opposed to the lowering of the existing post and rail fences. Reasons: • they are a deterrent. • restrict access to northern and southern plateaus.	1	Yes P49	See comment 11	1b, 1e

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16	P56 Rec 6: Suggests limestone as a suitable material for walk trail construction.	1	No	This will be considered when the site development plan is prepared during implementation of the management plan.	2c
17	P56 Rec 7: Relocation of the southern lookout to a lower position may encourage some people to climb beyond the lookout point.	1	No	See comment 12	2d
18	P56 Rec 7: The two hilltop structures do not need relocating or redesigning because they fit in with the concept of conservation for the island.	1	No	They are visually intrusive, non-functional and poorly located.	2d
19	P56 Rec 10: Dangerous areas on the outer edges of the recreation zone and talus slopes used by birds as breeding areas should be transferred to the conservation zone.	1	No	The plan provides for prohibiting access to specific areas if necessary. These areas are continually changing.	2d
20	P63 Recs: The hides on Penguin Island could be less obtrusive.	1	No	Supported DMP. Recommendation 7 (Action 7 in Final Management Plan).	2a
21	P53 Recs: Close the unofficial walk way at the northern tip of the island. Reasons: • encourages people to walk all over the nesting area. • there is a danger to people from falling off the path onto the rocks below.	1	No	Supported Draft Management Plan. Refer to figure 6b.	2a
22	Figure 6b: Supports closure of the south east beach only if absolutely necessary.	1	Yes P51	This figure was incorrect and has been amended in the Final Management Plan. It should have been shown as beach access.	1e
1	19.3 Recreation Area P47 Rec Strat: Opposed to a mobile refreshment facility at Penguin Island. Reasons: • refreshments can be obtained at Mersey Point. • the facility is not in keeping with a conservation park • aesthetically unacceptable.	1	No	Whilst refreshments can be purchased at Mersey Point, visitors are usually on the island for several hours at a time. It is considered that the mobile refreshment facility will provide an essential service to visitors with minimal detrimental impact on wildlife and other values. A permanent kiosk is not acceptable, as it would require resources (power, etc) not readily produced/available on the island. Such a facility can be in keeping within a conservation park where it is properly controlled.	2d

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2	P47 Rec Strat: Opposed to a mobile refreshment facility on Penguin Island. Reasons: • conflicts with the Islands conservation status. • litter will detract the ranger from more important jobs. • plastics affect wildlife.	1	No	See comment 1. Also litter is a common problem and is managed satisfactorily elsewhere.	2d
3	P48: The basic level of facilities proposed may not meet ever increasing tourist demands.	1	No	The facilities provided are considered appropriate for the future use on 'average' days and the direction and goals for management of Penguin Island.	2d
4	P56 Background: The facilities suggested in the draft plan are very basic and may not be able to meet needs at peak times when there can be thousands of people a day on the island.	1	No	See comment 3.	2d
5	P57 Rec 3: Opposed to the mobile refreshment facility on Penguin Island.	6	No	See comment 1.	2d
6	P57 Rec 3: Opposed to the mobile refreshment facility on Penguin Island. Reason: • should be restricted to Mersey Point.	2	No	See comment 1.	2d
7	P57 Rec 3: Opposed to the mobile refreshment facility on Penguin Island. Reason: • increase in litter.	2	No	See comments 1 and 2.	2d
8	P57 Rec 3: Opposed to the mobile refreshment facility on Penguin Island. Reasons: • problems with litter and disposal. • provide food scraps • increase the risk of exposing bird life to contaminated food. • plastics affect wildlife.	2	No	See comments 1 and 2.	2d
9	P57 Rec 3: Opposed to the mobile refreshment facility on Penguin Island. Reasons: • problems with power supply for refrigeration • problems with rubbish disposal. • no need to discontinue use of eskies.	1	No	See comment 1. Also use of eskies would not be prohibited.	2d

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10	P57 Rec 3: Opposed to the mobile refreshment facility on Penguin Island. Reason: • it would further deteriorate the pristine condition of the Island.	1	No	See comment 1. Also it is hard to accept the condition of the island as 'pristine' when it had a permanent shop there for many years as well as many asbestos houses, most of which have now been removed.	2d
11	P57 Rec 3: Opposed to the mobile refreshment facility on Penguin Island. Reasons: • litter problems, collection removal time and expense. • plastics affect wildlife. • national parks traditionally do not provide facilities at picnic sites. • the facility would be visually unacceptable.	1	No	See comments 1 and 2.	2d
12	P57 Rec 3: A mobile refreshment facility is essential on the island. A more permanent facility needs to be provided in the future.	1	No	Supported Draft Management Plan.	2a
13	P57 Rec 3: Addition to recommendation, "Investigate alternative methods of distributing basic refreshments to visitors, including the provision of a permanent kiosk facility as part of the interpretation centre.	1	No	A permanent structure is not required. See comment 1. See comment above.	2d 2d
14	P57 Rec 3: Support mobile refreshment facility at Penguin Island. A mobile facility is adequate on the short term, but a permanent structure would be required in the future.	1	No	Supported Draft Management Plan.	2a
15	P57 Rec 3: Supports a visually acceptable mobile refreshment facility on Penguin Island.	1	No	See comment 12(b).	2d
16	P57 Rec 4: All new building materials should complement their surroundings and have low profiles.	1	No	Supported Draft Management Plan. This is acknowledged.	2a 2d
17	P57 Recs: Access to drinking water on the Island is a necessity.	3	Yes P52	Text amended. Drinking water is and will continue to be provided. This was only mentioned in Section 19.5, Services in the draft management plan.	1e
18	P57 Recs: Lawns should not be provided because they encourage ball sports.	1	No	A small lawn area will be retained. This will be defined. Ball sports will be discouraged.	2d

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19	P57 Recs: The ferry operators should be permitted to establish a small ticket booth and information kiosk, with facility to sell food stuff at the jetty on Penguin Island. The facility would be removable at the end of each season as well as being aesthetically acceptable. 19.4 Buildings	1	No	The facilities mentioned are planned for Mersey Point.	2d
1	Map 6b: Suggests the toilet should be more appropriately sited close to the picnic area to prevent damage to the Acacia.	1	No	The new toilet facility has been constructed due to sewage leakage from use of the old toilets. Minimising disturbance to flora and fauna was a major aim.	2d
2	P58 Objective: Supports reasons for removing sub-standard buildings.	1	No	Supported Draft Management Plan.	
3	P58 Background: Supports the need to remove unsightly and inappropriate structures, replacing them with more functional, aesthetically and environmentally pleasing facilities.	1	No	Supported Draft Management Plan.	2a
4	P58 Background: Buildings must be in keeping with the surroundings.	1	Yes P55	Objective amended to include this aim.	1c
5	P58: The following new buildings are needed: • a building containing the toilet and shower block, food and drink outlet and information centre. • Rangers residence. • Accommodation for researchers. • General purpose storage shed.	1	Yes P55	See comment above.	1e
6	P59 Last para: Should read "camping is not permitted on any island or rock".	1	No	Toilets without a shower block have been constructed (see comment 1), no infrastructure will be required for the mobile freshment facility, an interpretation management facility with accommodation for overnight use if needed will be provided, the shed will be removed when no longer needed. (See also sections 24, Research, and 25, Staff).	2d
7	P59, 60 Recs: Supports recommendations.	1	Yes P55	Text amended to include Rocks, however the term overnight use was retained as this is preferred as it is more general than camping.	1e
8	P59 Rec 1: Reword "Remove all buildings and construct new facilities in accordance with the plan for facilities, incorporating appropriate tourism development objectives."	1	No	Supported Draft Management Plan.	2a
			No	Tourism and other objectives will be considered when the site development plan is prepared during implementation of the Final Management Plan. CALM will liaise with the relevant bodies.	2d

COMMENT NUMBER	SUMMARY OF COMMENT TO DRAFT MANAGEMENT PLAN	NO. OF SUBS	FMP AMENDED	DISCUSSION / ACTION TAKEN IN FMP	CRITERIA
9	P60 Rec 1: Opposed to the removal of the University accommodation block. Reasons: • it could be converted into the information centre to save costs. • the accommodation has historical value.	1	No	Research accommodation will be provided in the new interpretation/management facility, subject to permit. The existing building is unacceptable.	2e
10	P60 Recs: Preferred toilet would be the waterless, sealed, composting design.	1	No	See comment 1. The new toilets are of this design.	2d
11	P60, Rec 1, Point 4: Opposed to transferring the rangers residence from the island to the mainland. Reasons: • supervising restricted to daylight hours • accommodation in Rockingham is difficult to obtain and expensive.	1	No	CALM staff presence will be daytime. Overnight accommodation will be provided if needed in emergencies. A permanent CALM staff presence overnight is not considered necessary for the following reasons: • changes to access and facilities • implementation of interpretation/education programs • CALM staff presence at the proposed Mersey Point facility. • availability of resources. (See also Section 25, Priorities, Funding and Staff).	2d
12	P60 Recs: Suitable accommodation for a permanent ranger and family is required.	2	No	See comment 11.	2d
13	P60 Recs: The buildings need to be elevated high enough so they do not become sub-standard shelter for Penguins.	1	No	This level of detail will be considered when a site development plan is prepared during implementation of the Final Management Plan.	2c
14	P60 Recs: Recommends that CALM liaise with the Tourism Commission and private tourist sector on the standard and quality of the interpretation facility.	1	No	This level of detail will be considered when a site development plan is prepared during implementation of the Final Management Plan.	2d
15	P83 Priorities: Concern about the removal of old buildings. How soon after this removal will the building of new facilities such as the rangers accommodation and overnight accommodation commence. 19.5 Services	1	Yes P55	Recommendation 1 reworded for clarity (Action 1 in Final Management Plan). Old buildings will be removed when new facilities are constructed.	1e
1	P53 Recs: Monitor the existing water line on Penguin Island.	1	No	Supported Draft Management Plan.	2a
2	P61 Para 1: Cylinder gas will obviously continue to be used.	1	Yes P56	Recommendation reworded to exclude specific reference to gas to allow flexibility in the future if a more suitable alternative can be provided.	1e

COMMENT NUMBER	SUMMARY OF COMMENT TO DRAFT MANAGEMENT PLAN	NO. OF SUBS	FMP AMENDED	DISCUSSION / ACTION TAKEN IN FMP	CRITERIA
3	P61 Rec 2: A reliable 24 hour 240v power supply is required for lighting, heating food, refrigeration, grass watering, and power for equipment used in the information centre.	1	No	Many of these uses will not be provided. A power source appropriate for the identified needs will be provided.	2d
4	P61 Rec 3: Suggest investigating the use of wind and solar power.	1	Yes P56	Recommendation reworded to include the investigation of alternative sources of power (Action 2 in Final Management Plan).	1d
5	P61 Rec 4: The pipe is not necessary if waterless toilets are used and drinking water is provided from rain water tanks.	1	No	These types of toilets have been constructed (see previous section) . Use of mainland water is preferred to tank water.	2d
6	P61 Recs 3 & 4: The proposed facilities for Penguin Island are insufficient to cater for the tourist potential of the Island. The Island needs to be connected to mainland SEC and water supply facilities.	1	No	The island is connected to mainland water. Mainland power will not be connected. A power source appropriate for the identified needs will be provided.	2a, 2d
7	P61 Rec 4: Supports the need for a good water supply to the Island. Consider installation of reticulation to save the ranger's time moving sprinklers. The existing pipeline will need upgrading.	1	No	Supported Draft Management Plan.	2a
8	P61 Recs: Visitors should have access to a phone on the Island either at the information centre or at the rangers residence.	1	No	Watering of lawn will be considered at the site development stage during implementation of the Final Management Plan.	2c
9	P66 Recs: Communication links need to be established between CALM, the commercial operators and the mainland for use other than emergencies.	1	No	Emergency access to a phone will be provided however no 'normal' use.	2d
	20.0 ACCESS ON TO SHOALWATER ISLANDS OTHER THAN PENGUIN ISLAND			The specific detail of liaison between CALM and the commercial operations will be considered during implementation of the plan.	2d
1	P63 Recs: Supports recommendations.	1	No	Supported Draft Management Plan.	2a
2	P63 Rec 1: Recommends that all Islands should be closed to the public. Flora and fauna can be viewed adequately from a boat.	1	No	Controlled access is allowed on Penguin Island (Refer to sections 19.1 and 19.2 in Final Management Plan). All other Islands/Rocks are 'closed'.	2d
3	P63 Rec 1: Supports recommendation to prohibit access to all islands other than Penguin Island. This will be an important step in conserving the existing flora and fauna.	3	No	Supported Draft Management Plan.	2a

COMMENT NUMBER	SUMMARY OF COMMENT TO DRAFT MANAGEMENT PLAN	NO. OF SUBS	FMP AMENDED	DISCUSSION / ACTION TAKEN IN FMP	CRITERIA
4	P63 Rec 1: Supports the closure of Seal Island to the public.	2	No	Supported Draft Management Plan.	2a
5	P63 Recs: Supports the closure of Seal Island. An education and interpretation program is needed to explain the reasons for the island closure.	1	No	Supported Draft Management Plan.	2a
6	P63 Rec 1: Supports recommendation, especially the closure of Seal Island. The public harass the wildlife. Behavioural guidelines for boats need to be set out clearly and simply.	1	No	Supported Draft Management Plan.	2a
7	P63 Rec 1: Supports the closure of Seal Island to the public. Large numbers of visitors to the Island during summer harass the seals and destroy the vegetation.	2	Yes P58	Action 4 added to Final Management Plan.	1a, 1b
			No	Supported Draft Management Plan.	2a
8	P63 Rec 1: Supports the closure of Seal Island to the public. Seals can be viewed from boats as part of the Shoalwater Island cruise.	2	No	Supported Draft Management Plan.	2a
9	P63 Rec 1: Supports closure of Seal Island with no landings by the general public unless accompanied or in the presence of a ranger.	1	No	Supported Draft Management Plan.	2a
			No	Due to resource constraints guides will be CALM approved and thus will not necessarily be a Ranger.	2d
10	P63 Rec 3: The placement and control of markers should be formalised under the navigable waters regulations, so they can be publicised and shown on the navigation charts of the sea.	1	Yes P58	Recommendation 3 amended (Action 3 in Final Management Plan) CALM will liaise with the Department of Marine and Harbours.	1c
11	P36 Rec 1: Opposed to the closure of Seal Island.	1	No	This is necessary for wildlife protection reasons. Access is allowed with CALM approved guides.	2d
12	P63 Rec 4: Supports viewing of seals from boats or special cruises. Visits to the Island should be restricted to the guidance of approved individuals.	1	No	Supported Draft Management Plan.	2a
13	P63 Rec 4: Opposed to interpretive tours of Seal Island under approved leadership. Reasons: - disturbance of the sea lion colony and other wildlife - lack of toilet facilities - visitors to the Island would be regarded as having special privileges attracting jealousy.	1	Yes P58	Recommendation amended. The need for stringent conditions, including limits on numbers and frequency of visits was added (see Action 2 in Final Management Plan). However tours allowed on this very restricted basis.	1b, 1d

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14	P63 Rec 4: Opposed to interpretive tours of Seal Island, unless in groups of 5 people or less and only under the guidance of a CALM ranger.	1	Yes P58	See comment 13. Due to resource constraints guides will be CALM approved and thus not necessarily a Ranger.	1b, 1d
15	P63 Rec 4: Opposed to interpretive tours of Penguin Island. This will encourage other members to land on the Island.	1	Yes P58	See comment 13	1b, 1d
16	P63: Seeks permission to conduct guided tours to Bird Island to observe the flora, fauna and marine life. This would involve groups of 4-6 for short stays.	1	No	Permits will be assessed upon application. This level of detail is beyond the scope of this plan.	2c
17	P63 Strategy: A ten metre buffer zone could cause congestion of boats on busy days endangering the seals. Signs at boat ramps could set limits to the number of boats at the site as well as patrols by CALM staff.	1	Yes P58	Recommendation 3 amended (Action 3 in Final Management Plan). The area of the buffer zone will be determined by trial.	1a, 1b
18	P63 Recs 3 and 5: Inform people of the closure of Seal Island using signs at the local boat ramps.	1	Yes P65	Signs are considered in Section 22, Information/ Interpretation and Education. The need for signs at boat ramps was added to the text of this section.	1b
19	P63 Recs 4 and 7: Volunteers need to be trained to be effective guides for visitors.	1	No	Supported DMP. This is considered in Section 23, Community Liaison and Volunteer Involvement.	2a
20	P64 Rec 6: More than one ranger will be needed on Islands to patrol during peak periods.	1	No	This ability is subject to available resources. See Section 25; Priorities, Funding and Staff.	2c
21	P63 Rec 7: Reword " ..will need a permit and be under supervision" .	1	No	Either permit or supervision is considered appropriate control.	2d
22	P9 Para 8: Disagrees that Seal Island has a high conservation value.	1	No	Seal Island is considered to have a high conservation value, particularly given the presence of the Sea-lions which are gazetted 'in need of special protection'.	2e
1	21. SIGNS (NOTE: This section has been incorporated into section 22, Information/Interpretation and Education in the Final Management Plan).				
1	P64: Signs are needed at the northern end of Penguin Island to prevent access to the Bridled Tern nesting areas.	1	No	This level of detail will be considered when the sign plan is prepared. Access is one of the major issues which will be included. All comments are noted and will be considered at this stage. (Refer to Action 10, Section 22 in the Final Management Plan).	2c

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2	P64: A large "NO ENTRY" sign should be erected on the beach north of the major cave area at the east side of the Island to curtail the public interference with the breeding of Bridled Terns.	1	No	See comment 1.	2c
3	P64 Background: The success of the management plan will depend on the effectiveness of the signs. Suggest a minimum of highly visible signs under 1 metre in height.	1	No No	Supported Draft Management Plan. See comment 1.	2a 2c
4	P64: Signage will be very important in the management of the Shoalwater Islands in informing visitors about the natural attractions and facilities and in inviting their co-operation in preserving the environment.	1	No	Supported Draft Management Plan.	2a
5	P63 Rec 2: Boat ramps in the area need to have signs indicating landing and anchoring points, facilities and fishing zones.	1	Yes P65	Text amended to include the need for signs at boat ramps and other locations (Section 22 in Final Management Plan).	1b
6	P64: Signs, especially in the Mersey Point area need to be upgraded and rationalised.	1	No	Fishing zones will be considered in a management plan for the Marine Park and is beyond the scope of this plan. Supported Draft Management Plan.	2c 2a
7	P63 Rec 1: Suggest a sand bar hazard sign updated each season with tidal information suggesting safest times to cross the bar.	1	No	This suggestion is noted. This level of detail will be considered when a sign plan is developed during implementation of the Final Management Plan. (Action 10, Section 22 in Final Management Plan)	2c
8	P64 Rec 2: Proposed recommendation "Relocate existing danger signs at Mersey Point and install multi-lingual warning signs".	1	No	This area is managed by the City of Rockingham. CALM will liaise with the City of Rockingham regarding these concerns.	2c
9	P64 Rec 2: Signs at Mersey Point need to be clearer about restrictions on Penguin Island such as 'no dogs', and 'no BBQs' available.	1	No	See comment 8.	2c
10	P64 Rec 2: Signs at Mersey Point need to be streamlined.	1	No	Supported Draft Management Plan.	2a

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11	P64 Recs: More signs are needed to advise people of regulations regarding the conservation area.	1	No	A sign plan will be prepared during implementation of the Final Management Plan and will include the design, location, and wording of signs. All comments are noted and will be considered at this stage.	2c
12	P64 Recs: More signs are needed at boat ramps and launching sites to remind boat owners not to throw rubbish overboard.	1	No	This level of detail will be considered during implementation of the plan. CALM will liaise with relevant authorities regarding signs on non-CALM managed sites.	2c
13	P64: More signs are necessary to prevent people walking on the talus slopes and on the plateau top.	1	No	See comment 11.	2c
14	P64 Recs: More and larger signs are needed to inform the public where the restricted and breeding areas are located. These signs need to be multi lingual.	1	No	See comment 11.	2c
15	P64: Fines should be applied immediately against people ignoring signs with heavier fines for repeat offenders.	1	No	Beyond scope of plan. The application and size of fines is continually assessed.	2c
16	P64 Recs: A large sign stating do's and don'ts is required at the Penguin Island jetty.	1	No	See comment 11.	2c
17	P64 Recs: Suggest 'no food' signs at ferry information board.	1	No	See comment 11.	2c
18	P64 Recs: Important sign sites are Mersey Point, Port Kennedy Cape Peron, and local boat ramps.	1	Yes P65	See comment 5.	1b
1	22. COMMERCIAL OPERATORS (NOTE: This is section 21 in the Final Management Plan)				
1	P66 Rec 1: The future role to be played by CALM is unclear and needs to be clarified.	1	No	Proposals for commercial operations are considered on a case-by-case basis upon application. CALM may undertake commercial activities depending on the nature of the activity. Funding is considered in detail in Section 25, Priorities, Funding and Staff in the Final Management Plan.	2d
2	P66 Rec 1: Suggest that the undertaking of commercial activities by CALM is not the best use of resources. CALM should simply manage and set conditions for leases.	1	No	See comment 1.	2d

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3	P65: The continuation of tourism and leisure together with conservation of the area should be researched.	1	Yes P73	Recommendation 6 amended in Section 24 Research and Monitoring (Action 6 in Final Management Plan) to include the need for research on the interaction between Penguins and visitors.	1b
4	P65: An indepth specific tourism plan should be embodied in this report.	1	No	Beyond Scope of Plan. The tourism values are acknowledged.	2c
5	P66-67 Recs: Both coach tour and inbound tour operators should have direct access to the decision making process.	1	No	Liaison is provided for in recommendation 8 (Action 8 in FMP).	2d
6	P66-67 Recs: Tourism liaison between CALM and the WA Tourism Commission should be at least at managerial level.		Yes P66	Recommendation 8 reworded and 9 deleted. There will be regular liaison. The request for liaison at managerial level is noted (Action 8 in Final Management Plan)	1e
7	P65 Background: Increasing involvement by commercial operators may be needed to develop the full tourist potential of the Shoalwater Islands because of possible limitations on CALM staff and money.	1	No	See comment 1.	2d
8	P65: Commercial operators should be represented in the final management plan and they should be included in ongoing advisory committees.	1	No	Commercial operators are considered in the plan. Representation on an advisory committee will be considered when it is established during implementation of the Final Management Plan. All requests for membership are noted.	2b, 2c
9	P65: Continued liaison with commercial operators will prevent unnecessary stress being placed on Penguin Island through visitor use or misinformation.	1	No	Supported Draft Management Plan.	2a
10	P66 Para 1: Concern that a Ground Water Consultants Study was used to determine whether people were interested in wildlife.	1	No	No change sought.	2b
11	P66 Recs 1-6: Suggests these recommendations merely repeat the obvious.	1	No	No change sought.	2b
12	P67 Recs: Commercial operators to be represented on Shoalwater Islands Advisory Committee.	1	No	See comment 8.	2c
13	P67 Recs: Ferry contract to be 5 year with 5 x 5 option.	1	No	Beyond scope of plan. Detail too specific for plan.	2c

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14	P66: Commercial operators need right of way over all power and non-power operators.	1	No	Beyond scope of plan.	2c
15	P66: CALM volunteers can receive financial benefits for future regular group bookings.	1	No	Management of finances is CALM's responsibility.	2c
16	P66 Recs: Commercial operators need access to water and power on Penguin Island.	1	No	This will be considered on a case-by-case basis during implementation of the plan upon the request of commercial operators.	2d
17	P67 Rec 3: Consider safe moorings for commercial operators.	1	No	Beyond scope of plan.	2c
18	P73: Funds generated from tourism could be utilised to provide further research opportunities on Penguin Island.	1	No	This is acknowledged. All options for funding will be considered. Refer to section 25 Priorities, Funding and Staff in Final Management Plan.	2d
19	P83: The Council requests that CALM and the City of Rockingham work closely to ensure the most acceptable method of operation develops to protect this areas major tourist attractions.	1	No	Supported Draft Management Plan.	2a
1	23. INFORMATION/INTERPRETATION AND EDUCATION (NOTE: This is section 22 in the Final Management Plan).				
1	P72 Para 2: Does not reflect the importance of volunteers involvement on the Island. Suggested recommendation "A base for over forty volunteers, who deliver a regular information service to visitors, and conduct some formal guided tours, concentrating on the peak periods during summer".	1	Yes P67	Text and new action 4 added to revised section 23 Community Liaison and Volunteer Involvement in Final Management Plan.	1a
2	P72: Need for recognition of the importance of maintaining the high standard of volunteer service. Suggests two additional recommendations: 1. "The recognition of the role of the Penguin Island volunteers be reflected in adequate, ongoing support and funding. 2. Further expansion of the volunteer program into areas of interpretation and environmental education, resulting in regular guided walks.	1	Yes P67	See Comment 1.	1a
3	P73 Rec 3: Adequately trained volunteers should be used for regular guided tours. Information services can be provided by trained commercial operators.	1	Yes P67	See comment 1. The need for training was added.	1a

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4	P72 Para 4: Proposals to keep a captive groups of Penguins ie hand-reared 'second chick' should be given consideration. This would provide enhanced research opportunities and guaranteed penguin viewing.	1	No	This is not compatible with goals, management direction and CALM's 'message' to visitors in the education program for the Islands. Techniques for viewing penguins in a 'wild' a state as possible will be investigated, this is a high priority in visitor management. There may be opportunities for viewing Penguins recuperating in enclosures on the Island.	2d
5	P72 Para 4: Propose the introduction of a captured colony of second egg chicks. Penguins could be viewed 12 months of the year.	1	No	See comment 4.	2d
6	P72 Para 4: Penguin Parades and the hand rearing of chicks for display is unacceptable. Need to educate people about the reasons.	1	No	Supported Draft Management Plan.	2a
7	P72 Para 4: Serious consideration should be given to a limited trial of nocturnal viewing of Penguins.	1	Yes P65	Limited night viewing under CALM supervision and stringent conditions is allowed subject to the impact on wildlife. Penguin Parades, that is, large numbers of visitors with lighting and other infrastructures, is unacceptable (refer to text for reasons).	1b
8	P72 Para 4: Every endeavour should be made to investigate possibilities that may exist to introduce night viewing of Penguin landings. Trials should be set up as soon as possible.	1	Yes P65	See comment 7.	1b
9	P73 Rec 3: Consideration should be given to having the Penguins more accessible. Suggest construction of suitable viewing sites where the Penguins movements can be controlled.	1	No	Penguin viewing is a high priority in visitor management. A facility will be provided. The best design and location will be investigated.	2d
10	P72, 73 Recs: Every attempt should be made to ensure that visitors do see Penguins, even if they are captive ones. The provision of boardwalks will relieve this problem.	1	No	See comment 9.	2d
11	P72, 73 Recs 2 and 3: Size and quality of the interpretive facility and walks is critical to the ultimate success of the Island as a tourism/visitor attraction. They should be built to accommodate expected visitor numbers during peak periods. Estimated at 3 000 people/day.	1	No	This will be considered in a site development plan during implementation of the Final Management Plan. The average number of visitors will be catered for. CALM will liaise with relevant bodies.	2c

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12	P72 Rec 2: Interpretation/viewing facility must be capable of coping with peak demand, estimated at 3 000 visitors per day, and providing a quality experience for visitors.	1	No	See comment 11.	2c
13	P72 Rec 2: Suggested desirable features for the information centre - • fully equipped kitchen • work or laboratory room • rest room • sloping display cabinets • large enough to cater for future demands.	1	No	See comment 11.	2c
14	P71: The proposed major objective of 'conservation and environmental education' is too restrictive for an important tourism/recreation opportunity like Penguin Island. Add to objective "increase visitor satisfaction and education through tourism/recreation."	1	No	This is covered in the goals and objectives for Recreation and Information/Interpretation and Education.	2d
15	P71 Objectives: Supports objectives. Concern that the implementation and maintenance of the objectives will involve considerably more money and staff time than CALM presently has at its disposal.	1	No	Supported DMP. Funding opportunities are considered in section 25, Priorities, Funding and Staff in the Final Management Plan.	2a
16	P72 Para 4: There are a number of potential research programs into captive colonies that could be investigated.	1	No	All non CALM research programs are assessed upon application and subject to permit.	2c
17	P72 Para 4: Disagree with not keeping a captive colony of Penguins as the size of the non captive colony is not known.	1	No	See comment 4.	2d
18	P72 Rec 1: The Rockingham and Districts Tourist Information Centre would be an ideal place for a CALM prepared display about the Shoalwater Islands.	1	No	This is noted. Appropriate displays in non-CALM managed locations are supported. This is subject to funding constraints.	2c
19	P73 Rec 5: Adequate staffing is important to the success of information and education services.	1	No	This is acknowledged. Staffing is subject to available resources.	2c
20	P72, 73 Rec 5: Add recommendation: "Investigate alternative methods/sources of funding/development of interpretative and viewing facilities.	1	Yes P80	Recommendations amended in Section 25, Priorities, Funding and Staff (Actions 8 to 10 in the FMP) regarding the need to investigate other sources of funding.	1a

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21	P73Rec 6: Initial information services such as tourist brochures giving details of the Shoalwater Islands should be widely distributed to tourist information centres and hotels. These are the initial information sources for visitors to be followed up by purchase of booklets and activity guides at Mersey Point and Penguin Island.	1	No	This is noted and will be considered via the Regional Interpretation Plan.	2d
22	P73 Rec 7 & 8: Supports recommendation. Good liaison with commercial operators and tourist centres will ensure that visitors are given correct information about the islands to lessen any possible disappointments.	1	No	Supported Draft Management Plan.	2a
23	Background: The public need to be educated through the media, newspapers, radio station and tourist bureau pamphlets, about the reasons for prohibiting camping, barbeques and fires.	1	No	Supported Draft Management Plan.	2a
1	24 RESEARCH AND MONITORING				
1	P77: The great potential for a detrimental impact on the Shoalwater Islands and marine life from proposed increases in sewage from Cape Peron and Becher Point outlets should be addressed.	1	Yes PP13, 73	This has been added to Section 5 Interaction with Surrounding Waters (Actions 2 and 4 in Final Management Plan). This was included generally in recommendations Research and Monitoring section (Action 2 in Final Management Plan).	1a
2	P77: Background: Suggests that the research on Penguin Island is concentrated on birds. If funds permit, research should be directed to the ecosystem in its entirety.	1	No	Supported Draft Management Plan.	2a
3	P79 Rec 3: Supports recommendation .	1	No	Supported Draft Management Plan.	2a
4	P79 rec 5: Should read "impact of recreation activities on pest species and on the islands values for breeding and nesting habitat for seabirds.	2	Yes P73	Recommendation 5 (Action 6 in FMP) amended as requested.	1a
5	P79 Rec's 11-13: Tourist information centres like the one at Rockingham could be of help with visitor surveys.	1	No	This is noted and will be considered when visitor surveys and visitor monitoring is conducted.	2b
6	P79 Recs: Housing for researchers is very necessary to enable them to carry out evening and early morning observations.	1	No	Supported DMP. This is recognized and provided for in the interpretation/management facility.	2a
7	P79 Recs: Supports recommendations.	1	No	Supported Draft Management Plan.	2a
8	P79 Recs: Supports encouraging research.	1	No	Supported Draft Management Plan.	2a

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	25 PRIORITIES, FUNDING AND STAFF				
1	P83: The draft plan does not discuss opportunities that exist in the private sector for funding management strategies such as staffing.	1	Yes P80	New actions incorporated regarding seeking sources of funding, other than CALM funding (Actions 8 to 11 in Final Management Plan).	1a
2	P83: The plan will only be effective if the government is prepared to allocate sufficient funds to provide adequate staff to supervise the Park, as well as resources to implement the recommendations.	1	Yes PP79, 80	This is acknowledged. See also comment 1. Funding is subject to CALM and other State priorities.	1a
3	P85 Rec 4: Funding should be sought from private enterprise, government and other organisations dealing with recreation, education and tourism.	1	Yes P80	See comment 1.	1a
4	P85 Rec 4: Willing to be a major contributor to funds for a ranger for the islands on a full time basis.		No	This is noted. See comment 1.	2c
5	P85 Recs: Proper enforcement of the CALM Act would provide additional funds for the wages and maintenance of CALM staff on the Islands. During the peak season at least 3 rangers are needed just on Penguin Island.	1	No	Staffing is according to CALM and other state priorities. Funding is not a basis for enforcement.	2c
6	P83: At least one ranger is needed permanently for regular patrols over the island, with two rangers on peak use days.	1	No	Staffing is according to CALM and other state priorities. Sufficient staff will be sought within this context.	2c
7	P84 Recs: Proposed recommendation "full time ranger on island all year, honorary rangers/wardens during summer months.	1	No	Staffing levels are continually assessed subject to CALM and other state priorities. CALM staff presence will be day-time with emergency accommodation in the interpretation/management facility on Penguin Island. A Ranger living full-time on the Island is not considered necessary once facilities, access and information/interpretation and education programs are implemented, and with the staff presence on the Island and at Mersey Point (proposed) during the day. The availability of funding is also a constraint.	2c, 2d
8	P84 Recs: A full time ranger is needed year round.	1	No	See comment 7.	2c, 2d
9	P85 Recs: 108 signature petition supports the retention of a resident ranger on Penguin Island.	1	No	See comment 7.	2c, 2d

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10	P85 Recs: A full time ranger is required to realistically control vandalism and access, especially after daylight hours and during the winter.	1	No	See comment 7.	2c, 2d
11	P85 Recs: Recommends that a ranger remain resident on the island.	1	No	See comment 7.	2c, 2d
12	P85 Recs: Need a full time permanent ranger on Penguin Island to ensure the continued existence of important wildlife species.	1	No	See comment 7.	2c, 2d
13	P85 Recs: A full time resident ranger is crucial to the protection of the Islands. Reasons size, close proximity to large conurbation and its easy accessibility.	1	No	See comment 7.	2c, 2d
14	P85 Recs: Current ranger coverage is grossly inadequate. The resident ranger could be actively involved in interpretive programs.	1	Yes P79	Staffing levels are subject to CALM and other state priorities. Sufficient staff will be sought within this context. New actions 3 to 6 added to FMP.	1e
15	P85 Recs: A full time ranger is necessary to conduct tours to make sure that this unique island is protected from uncontrolled 'invasions' of the public.	1	No	See comment 7.	2d
16	P83: Staff will need to be adequately trained to provide a professional service to compliment the integrated visitor facilities.	1	Yes P79	Training is ongoing. Action added to specify this fact (Action 5 in Final Management Plan).	1e
17	P85 Recs: Investigate alternative means of implementation due to possible deficiencies in funding and staffing for example a statutory management board, private developers for infrastructure, therefore providing quality facilities and management presence.	1	Yes P80 No	Actions added regarding seeking alternative funding. Management by CALM on behalf of the NPNCA will continue.	1a 2c
18	P85 Recs: Supports recommendations. More money and staff are needed to implement the Draft Management Plan proposals.	1	No	Supported Draft Management Plan.	2a
19	P84 Table 2: CALM has an obligation to maintain its jetties, or remove it should CALM choose not to keep it in good condition.	1	No	No change sought.	2b
20	P84 Table 2: Raise the refreshment facility to priority 2 and defer the removal of non-indigenous trees until other shelter trees are established.	1	No	The mobile refreshment facility depends on commercial interest and investigation of a suitable method. Refer to Section 19.3 Interpretation/Recreation Area for detail. Removal of trees will be progressive and is only those species with a detrimental impact on the Islands' conservation values.	2b

COMMENT NUMBER	SUMMARY OF COMMENT TO DRAFT MANAGEMENT PLAN	NO. OF SUBS	FMP AMENDED	DISCUSSION / ACTION TAKEN IN FMP	CRITERIA
21	P84 Recs: Skippers on commercial vessels to be honorary rangers. 26 COMMUNITY LIAISON (NOTE: This is Section 23, Community Liaison and Volunteer Involvement in the Final Management Plan).	1	No	This is noted. Honorary/Volunteer positions will be in accordance with CALM policy.	2c
1	P86 Par 2: There is little mention of the use of volunteers in the plan.	1	Yes P67	Text and action added to emphasize the importance of volunteers.	1b, d, e
2	P86 Rec 1: Supports recommendation. Suggests that the Rockingham and District Tourist Authority should be a member of the Shoalwater Advisory Committee.	1	No	Supported DMP. Membership will be considered when the committee is established during implementation of the Final Management Plan.	2a
3	P86 Rec 4: Has the concept of Junior Park Rangers been considered.	1	No	This is noted. This level of detail is considered in implementation of the plan.	2c
4	P86 Recs: Supports recommendations	1	No	Supported Draft Management Plan.	2a
	27 TERM OF THIS PLAN (NOTE: This is Section 26 in the Final Management Plan).				
1	P87 Recs: Supports recommendations.	1	No	Supported Draft Management Plan.	2a

APPENDIX 1.

SUBMITTORS TO THE DRAFT MANAGEMENT PLAN

Individuals	P Bentley R Bettenay K Bradley N Brockroom P Gammon S Gammon C Garavanta K Grant C Hubbard MC Lantzke K Lester RC Major C Meathrel AJ Morgan O Mueller AE Paul J Percey S Pickersgill V Preston JA & MC Rutherford E Snook B Wienecke D Wieringa KA Williams PD Wilmot Capt. & DH Wilmott Dr RD Wooller
CALM	T Goodlich C Ingram JK Smart AN Start PR Udinga
Community Organisations	Curtin University OutsideClub Living Water Skindiving Club WA Naturalists Club (Kwinana / Rockingham / Mandurah Branch) WA Recreational and Sportsfishing Council Inc. Wetlands Conservation Society
Government (Local)	City of Rockingham
Government (State)	Fisheries Department G Hill - Minister for Fisheries

Western Australian Museum
Western Australian Museum - Dept. of Aboriginal
Sites
Department of Resources Development
Department of Mines
Ministry of Sport and Recreation
Water Authority of Western Australia
Department of Marine and Harbours
Department of Land Administration
Agricultural Protection Board of Western Australia
Western Australian Tourism Commision

Industry

Enterprise Australia LTD
WA Inbound Tour Operators Association
WA Road Transport
Rockingham and Districts Tourist Authority
Charter and Ferry-boat crewing services

