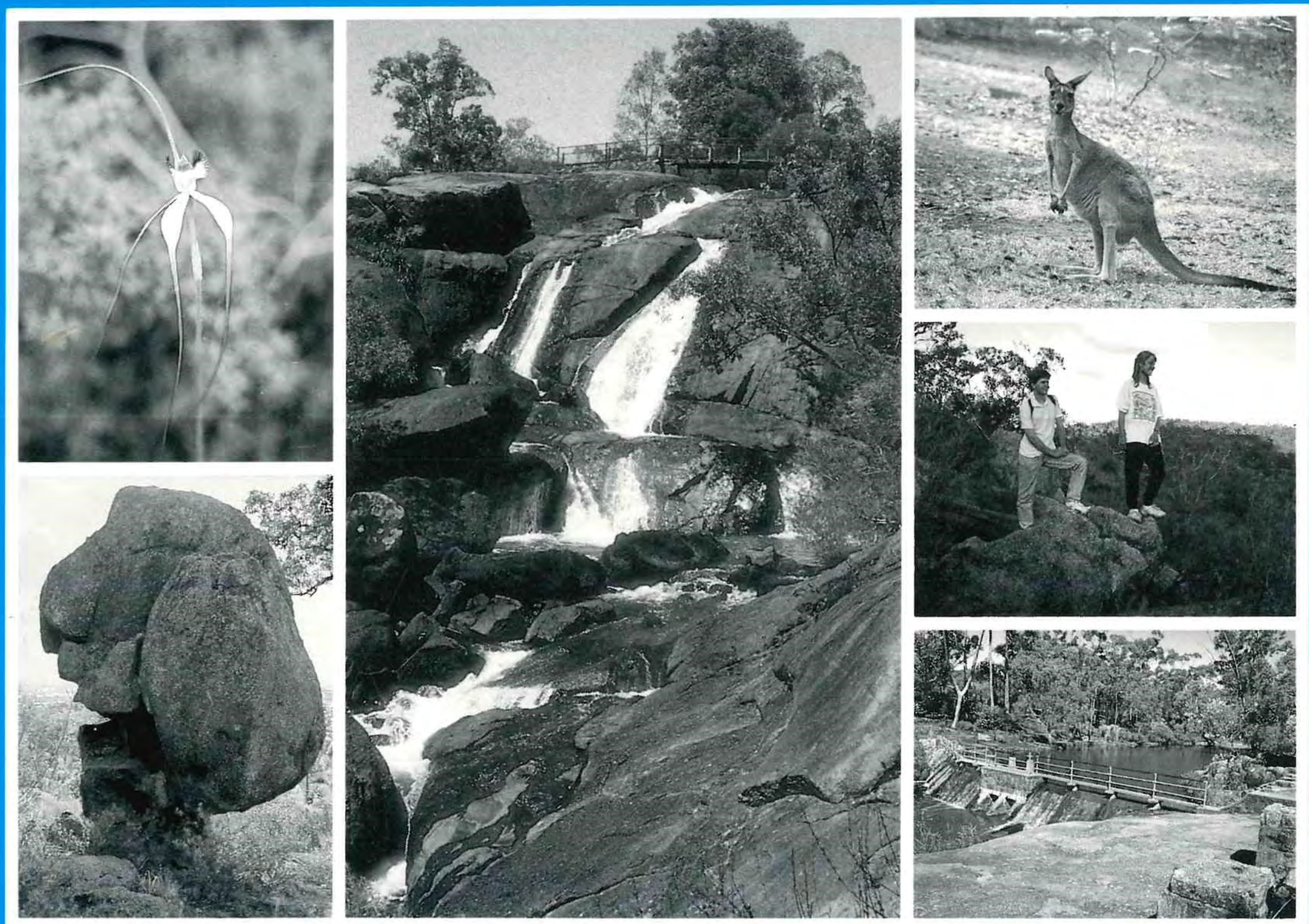


John Forrest National Park

Analysis of Public Submissions



MANAGEMENT PLAN No 26



Department of Conservation
and Land Management



National Parks and Nature
Conservation Authority

JOHN FORREST NATIONAL PARK

ANALYSIS OF PUBLIC SUBMISSIONS

TO THE DRAFT MANAGEMENT PLAN

Department of Conservation and Land Management
for the
National Parks and Nature Conservation Authority
Perth, Western Australia, 1994

CONTENTS

	Page
INTRODUCTION	iii
ANALYSIS OF PUBLIC SUBMISSIONS	iii
ANALYSIS TABLE	iv
ANALYSIS FLOW CHART	v
PART A. INTRODUCTION	
1.0 Overview	1
1.1 Park Overview	1
1.2 Historical Perspective	1
1.3 NPNCA and CALM Policies	1
1.4 Public Participation	1
2.0 Management Goals	1
2.1 Management Goals for National Parks	1
2.2 Management Goals for John Forrest National Park	2
2.3 Values and Management Concerns	2
PART B. LAND USE MANAGEMENT	
3.0 Land Tenure	2
4.0 Zoning	2
PART C. MANAGEMENT FOR CONSERVATION	
5.0 Principal Conservation Directions	2
6.0 Physical Resource Management	3
6.1 Climate	3
6.2 Geology, Landforms, Soils and Erosion Risk	3
6.3 Hydrology	3
6.4 Visual Resource Management	3
7.0 Biological Resource Management	4
7.1 Vegetation	4
7.2 Flora	4
7.3 Fauna	4
7.4 Disease	4
7.5 Fire Management	5
7.6 Feral Animals and Domestic Pets	8
7.7 Weeds	8
7.8 Raw Material Extraction	8
7.9 Rehabilitation	8
8.0 Cultural Resource Management	8
8.1 Aboriginal Heritage	9
8.2 European History	9
9.0 Commercial Resource Management	10
9.1 Mining	10
9.2 Utilities and Services	10
9.3 Beekeeping	10

	Page
PART D. MANAGEMENT FOR RECREATION	
10.0 Principal Recreation Directions	10
11.0 Recreation Opportunities	10
11.1 The Region	10
11.2 The Park	11
12.0 Access	12
12.1 Car Parking	13
13.0 Recreation Sites	13
14.0 Recreation Activities	13
14.1 Pleasure Driving and Sightseeing	13
14.2 Bushwalking	14
14.3 Barbecuing and Picnicking	14
14.4 Nature Appreciation	14
14.5 Camping	14
14.6 Horse Riding	15
14.7 Cycling	19
14.8 Swimming	19
14.9 Fishing	19
14.10 Group and Club-based Activities	19
14.11 Orienteering, Rogaining and Cross-country Running	19
14.12 Off-road Vehicles	20
15.0 Leases and Commercial Concessions	20
16.0 Buildings	22
17.0 Signs	22

PART E. INFORMATION, INTERPRETATION AND EDUCATION

18.0 Information, Interpretation and Education	22
---	----

PART F. RESEARCH AND MONITORING

19.0 Research and Monitoring	22
-------------------------------------	----

PART G. IMPLEMENTATION OF THE PLAN

20.0 Priorities	22
21.0 Staff and Funding	23
22.0 Liaison	23
23.0 Evaluation and Review	23

APPENDIX 1.

Submitters to the Draft Management Plan	24
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INTRODUCTION

This document is an analysis of public submissions to the draft management plan for John Forrest National Park (1992).

During the preparation of the draft plan, CALM, on behalf of the National Parks and Nature Conservation Authority (NPNCA), sought the participation of the general public and interested parties by:

- distributing pamphlets
- conducting visitor surveys
- advertising in local papers, and
- conducting a workshop.

Several meetings with relevant management authorities and interest groups were also conducted. These included the Shires of Swan and Mundaring. Predraft submissions were received during the preparation of the draft plan. All comments were considered and incorporated into the planning methodology where appropriate.

The John Forrest National Park draft management plan was released for public comment on 2 November 1992, by the then Minister for the Environment, the Hon. Jim McGinty MLA, at a public meeting held in the Park. The plan was circulated to all individuals and organisations who expressed interest during the preparation of the draft. It was also distributed to State Government departments, recreation and conservation groups, lease holders and local authorities. The document was available in local libraries, Shire offices and CALM offices, and was promoted in local and Statewide newspapers.

In accordance with the CALM Act (1984), the draft management plan was available for public comment for a period of three months until 5 February 1993. Individual requests for an extension of the submission period were granted and late submissions were accepted. A total of 75 public submissions were received.

All comments have been analysed in this document. Changes have been made to the draft management plan according to set criteria described below.

ANALYSIS OF PUBLIC SUBMISSIONS

Method of Analysis

Public submissions to the John Forrest National Park draft management plan were analysed according to the process depicted in the flow chart opposite. More specifically:

- All comments were collated according to the section of the draft plan they addressed.
- Each comment was assessed using the following criteria:
 1. Changes *were* made to the draft plan if a 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. Changes were *not* made to the draft plan if:
 - (a) there was clear support for the draft proposals;
 - (b) a neutral statement was offered, or no change was sought;

- (c) the submission addressed issues beyond the scope of the plan;
 - (d) the submission made points which were already in the plan, or had been considered during plan preparation;
 - (e) existing strategies and recommendations appeared to be the most practical, where submissions were in conflict with others or where resources are limited; or
 - (f) the submission contributed options which were not feasible (generally due to some aspect of existing legislation, or Government policy).
- The reasons why recommendations in the draft plan were, or were not, changed and the relevant criteria used were discussed with each comment.

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 factor which would give cause to elevate the importance of any submission above another.

Number and Origin of Submissions

Most of the submissions were 'substantial', i.e. no proformas or petitions were received. Several submissions relied on a photocopied format that was sufficiently worded to be considered as a substantial submission. The number and place of origin of submissions are listed below.

	Number	Percentage
CALM	2	2.7
Community - Individuals	51	68.0
Community - Organisations	12	16.0
Government Agencies	<u>10</u>	<u>13.3</u>
	75	100.0

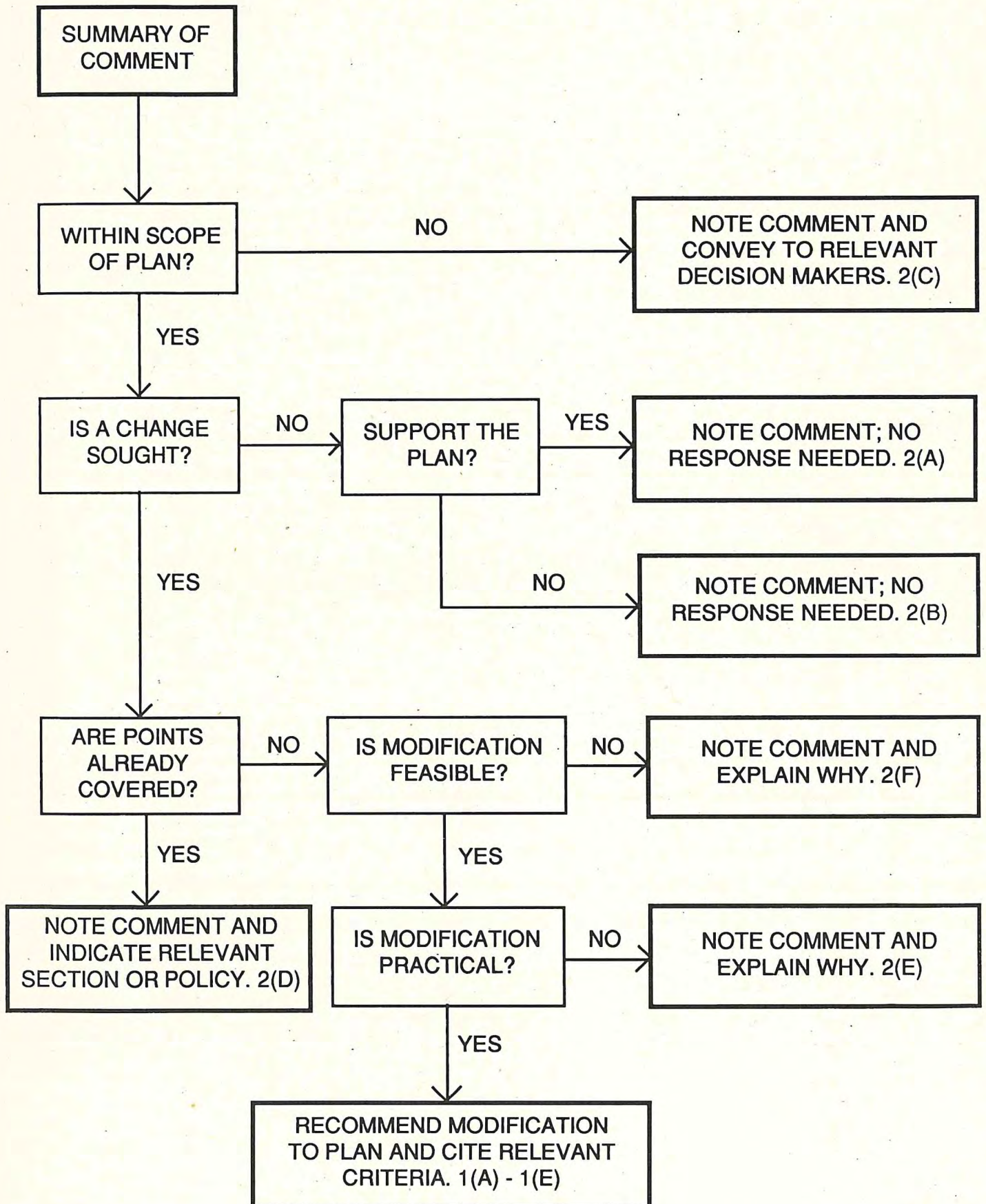
A list of the submitters to the John Forrest National Park draft management plan is given in Appendix 1.

ANALYSIS TABLE

The Analysis Table contains six columns:

- Comment Number: the number of different comments made about each section of the draft plan;
- Number of Submissions: the number of submissions pertaining to each comment;
- Summary of Comments: a summary of each comment made on the draft plan;
- Discussion/Action Taken: a discussion on why the comment did or did not result in an amendment to the draft plan;
- Plan Amended: an indication whether or not the comment resulted in an amendment to the draft plan; and
- Criteria: the criteria by which each comment was assessed.

ANALYSIS PROCESS



COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
		GENERAL COMMENTS <i>2 submissions.</i>			
1	1	Congratulated CALM on an easily understood document.	General comment only.	No	2(b)
2	1	Congratulating the Department and staff on preparing the above management plan. It is comprehensive in its scope, informative in its contents, and can be easily understood by the reader.	General comment only.	No	2(b)
		PART A. INTRODUCTION			
		1.0 OVERVIEW			
		1.1 Park Overview <i>No submissions.</i>			
		1.2 Historical Perspective <i>1 submission.</i>			
1	1	The Draft Management Plan only mentions the Religious Belief of the Waugal (p23) and Aboriginal concerns relating to the Park's waterways (p25). The "historical perspective" (p3) does not mention our ancient past and our history.	Plan amended.	Yes	1(e)
		1.3 NPNCA and CALM Policies <i>No submissions.</i>			
		1.4 Public Participation <i>2 submissions.</i>			
1	1	The visitor survey could in no way be considered as conclusive.	Agree that the visitor survey is not conclusive. However, information obtained was useful during preparation of the plan.	Yes	1(e)
2	1	No Aboriginal grass roots participation was sought until draft management plan was completed.	Considerable effort was made by Planning Team to organise meetings with Aboriginal groups.	No	2(b)
		2.0 MANAGEMENT GOALS			
		2.1 Management Goals for National Parks <i>1 submissions.</i>			
1	1	'Management' sounds like destruction.	As outlined in Section 2.2 of the plan the management goals for John Forrest National Park, and indeed for all national parks, are to conserve the area's natural attributes.	No	2(b)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
		<p>2.2 Management Goals for John Forrest National Park <i>No submissions.</i></p> <p>2.3 Values and Management Concerns <i>2 submissions.</i></p>			
1	1	Suggests no reason for management concerns at the presence of a tavern in the Park and such a facility should have been included on page 7 under the section headed Values - Kiosk, Tearooms and a Tavern-Restaurant.	Text amended accordingly.	Yes	1(c)
2	1	The "cultural values" (p7) and the "cultural environment" (p6 and p19) do not include the Aboriginal cultural values, environment and heritage.	Plan amended.	Yes	1(e)
		PART B. LAND USE MANAGEMENT			
		3.0 LAND TENURE <i>1 submission.</i>			
1	1	CALM has already been advised of the requirements for the widening of Great Eastern Highway to six lanes west of Bilgoman Road.	No change sought.	No	2(b)
		4.0 ZONING <i>2 submissions.</i>			
1	1	The Special Conservation Zone should be extended within the northern sector and low impact forms of recreation (eg. bushwalking, photography, nature appreciation) should not be discouraged.	This has been acknowledged and was considered during plan preparation.	No	2(d)
2	1	Recreation Zone should be above Special Conservation Zone.		No	2(d)
		PART C. MANAGEMENT FOR CONSERVATION			
		5.0 PRINCIPAL CONSERVATION DIRECTIONS <i>1 submission.</i>			
1	1	Our sole concern is protection and preservation and conservation of the Park.	Support for plan.	No	2(a)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
		<p>6.0 PHYSICAL RESOURCE MANAGEMENT</p> <p>6.1 Climate <i>No submissions.</i></p> <p>6.2 Geology, Landform, Soils and Erosion Risk <i>2 submissions.</i></p>			
1	2	Granite bedrock was formed between 2650 and 2550 million years ago (reference Geological Survey of WA Report 33).	Text amended accordingly.	Yes	1(e)
2	1	Note could be made that the dolerite dykes (intrusions) are hundreds of millions younger than the granite, but also of Precambrian age (older than 570 million years).	Text amended.	Yes	1(e)
		<p>6.3 Hydrology <i>2 submissions.</i></p>			
1	1	Recs 2 and 3 should be given a high priority rating and not medium priority as proposed in the report.	Text amended.	Yes	1(d)
2	1	The dam impacts significantly on the natural hydrology and terrestrial and aquatic ecosystems. This water is not used for domestic purposes so the impacts of swimming and fishing in Glen Brook dam would be negligible. The prohibition of swimming and fishing in Glen Brook Dam an altered environment shows a reluctance to apply Rec 2 (Section 11.2) to all users.	For safety and public health reasons swimming and any other water-based activities will not be permitted, however fishing under certain conditions - See amended objective and recommendations Section 14.9.	Yes	1(d)
3	1	It seems unfair to apply criteria of 6.3 Rec 3 to recreational anglers when there has been significant alteration to the alluvial dynamics, much to meet the needs of other users, at the expense of the aquatic environment.	See Comment 2 above.	No	2(b)
		<p>6.4 Visual Resource Management <i>1 submission.</i></p>			
1	1	Visual impact of litter encroaching into the Park from the truck bay in Great Eastern Highway, Glen Forrest, should be addressed in the Management Plan. CALM should liaise with the Council and Main Roads Department in an effort to minimise the negative visual pollution on the Park in the vicinity of the truck bay.	Text amended.	Yes	1(d)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
		<p>7.0 BIOLOGICAL RESOURCE MANAGEMENT</p> <p>7.1 Vegetation <i>No submissions.</i></p> <p>7.2 Flora <i>No submissions.</i></p> <p>7.3 Fauna <i>1 submission.</i></p>			
1	1	The final paragraph should state three not two mammals found in the Park are endemic to Western Australia, they are: <i>Sminthopsis gilberti</i> , <i>Tarsipes rostratus</i> and <i>Macropus irma</i> . On page 35, <i>Cercartetus</i> is misspelt.	Text amended accordingly.	Yes	1(e)
2	1	It would have been useful to have appendices listing the plant and vertebrate species recorded for the Park.	Information is available for Park management.	No	2(d)
		<p>7.4 Disease <i>2 submissions.</i></p>			
1	1	Priority should be given to map dieback disease in the northern extension and undertake all preventative measures to stop its spread.	This is already provided for in plan.	No	2(a)
2	1	Suggest an amendment to Section 7.4, Rec 2, to read as follows: "require walkers to stay on formed tracks in disease affected areas especially during high risk times of the year".	Text amended.	Yes	1(d)
3	1	The plan must take account of the grass roots knowledge and information about the land (eg. the thing that kills dieback is fire).	Where appropriate, Aboriginal cultural management technology will be incorporated in management. With regard to fire and dieback, research has shown that hot fire stimulates forest regeneration but has no effect on dieback.	No	2(e)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
1	1	<p>7.5 Fire Management <i>8 submissions.</i> The placement of areas with fuel loadings above 8.5 t/ha is inappropriate and in conflict with CALM's responsibility to protect life and property. Conservation objectives and protection for the community can be adequately covered by:</p> <ol style="list-style-type: none"> 1. Reducing the area of No Planned Burn in the southern portion of the Park. 	<p>The fire plan has been amended to better comply with interagency agreements and departmental policies for fire control in the area. The final fire plan is more achievable, and takes special consideration of the small size of the Park and the requirement to protect adjacent private assets and community values.</p>	Yes	1(d)
2	1	<ol style="list-style-type: none"> 2. Reducing the area of 12-15 t/ha fuel accumulation adjacent to the perimeter of the Park. 	See Comment 1 above.		
3	1	<ol style="list-style-type: none"> 3. Reducing the Fuel Reduced Buffer areas adjacent to the people areas as frequent burning will encourage the further incursion of weeds into the area. 	See Comment 1 above.		
4	1	<ol style="list-style-type: none"> 4. Increasing the areas of standard fuel reduction (8.5 t/ha) as, in much of JFNP, burn rotations will equate to 8-12 years of age to exceed these fuel loadings. 	See Comment 1 above.		
5	1	<ol style="list-style-type: none"> 5. Provision of a section within the Fire Management Section that ensures prescribed burning is carried out with variability of fire regime. 	See Comment 1 above.		
6	1	This section should be redrafted to better align with CALM's Fire Policy.	Fire plan amended. See Comment 1 this section.	Yes	1(d)
7	1	Strongly supports Rec 5.	Support for plan.	No	2(a)
8	1	Objective 7 is really a strategy and should read as follows: "To provide for and maintain the existing natural abundance and composition diversity of vegetation association and wildlife habitats".	Text amended.	Yes	1(d)
9	1	Mention should be made of variations in fire intensity, season and soil dryness that may be applied to these burns. This variation is considered by fire ecologists to be important in providing a diversity of vegetation responses to fire treatments.	Text amended.	Yes	1(e)

<i>COMMENT NUMBER</i>	<i>NO. OF SUBS</i>	<i>SUMMARY OF COMMENT</i>	<i>DISCUSSION / ACTION TAKEN</i>	<i>PLAN AMENDED</i>	<i>CRITERIA</i>
10	1	Commends CALM for including fire exclusion areas for the conservation of faunal niches particularly old logs and leaf litter.	Fire plan has been amended but still provides for fire exclusion areas (see Comment 1 above - 7.5)	Yes	1(d)
11	1	Do not support fuel loadings of 12-15 t/ha against fire exclusion zones in high risk areas.	Fire plan amended. See Comment 1 this section.	Yes	1(d)
12	1	Will reconsider support of the John Forrest High Risk Interagency Agreement as it does not meet the spirit of the agreement which was reached on the basis of fuel levels being maintained where direct attack on fire will succeed, ie. 7-8 t/ha and responses have been agreed on that basis.	Fire plan amended. See Comment 1 this section.	Yes	1(d)
13	1	Concerned at the draft fire management plan of the JFNP due to the high fuel loadings indicated on the plan.	Fire plan amended. See Comment 1 this section.	Yes	1(d)
14	1	The adequate protection of both the conservation objectives and surrounding private property can be achieved by: The Shire of Swan and CALM liaise with private property owners on the western boundary of the Park, south of Toodyay Rd, in order to upgrade existing fire breaks to 6 metres.	Strategic fire breaks, if required, will be developed in conjunction with adjoining land owners and local authorities.	Yes	1(d)
15	1	The area south of Toodyay Rd, between the private property and the proposed no burning area, be kept to a manageable level of up to 6 t/ha.	Fuel loading in area south of Toodyay Rd has been amended to below 8.5 t/ha.	Yes	1(d)
16	1	The existing firebreak from Toodyay Rd, heading south between the proposed 6 t/ha corridor and the planned 'no burning area' be upgraded to a width of 6 metres, and that the intermediate break which sectorise the proposed 6 t/ha buffer zone be upgraded to 3 metres.	Refer to Comment 14 above.	Yes	1(d)
17	1	To protect the private property to the west and the planned 'no burn area' to the east, it is recommended that an additional buffer be implemented east of the recommended strategic firebreak, and that it be reduced to a manageable fire loading of up to 8.5 t/ha.	Additional protection afforded to private property by the Fuel Reduction Regime.	Yes	1(d)

<i>COMMENT NUMBER</i>	<i>NO. OF SUBS</i>	<i>SUMMARY OF COMMENT</i>	<i>DISCUSSION / ACTION TAKEN</i>	<i>PLAN AMENDED</i>	<i>CRITERIA</i>
18	1	That the recommended fuel build up of 12-15 t/ha be amended to a fuel build-up of not more than 8.5 t/ha on the northern 'no burn area'.	Fire plan amended. See Comment 1 this section.	Yes	1(d)
19	1	Recs 2 and 4-6 are supported.	Support for plan.	No	2(a)
20	1	With Rec 1, the fuel loadings indicated on Map 8 are questioned. There are some parts of the Park where fuel levels can be permitted to rise to 12-15 t/ha but not where the boundaries abut residential areas along Great Eastern Highway in Hovea. The creation of a 'no planned burn' area close to Rocky Pool in very difficult terrain, may prove hazardous with either our prevailing easterly or westerly winds. The recommended fuel loading should be reassessed.	Fire plan amended. See Comment 1 this section.	Yes	1(d)
21	1	Rec 3 is supported, subject to the fuel loading envisaged in the Response Plan being based on realistic management levels and not on 12-15 t/ha.	Fire plan amended. See Comment 1 this section.	Yes	1(d)
22	1	Rec 7 is supported. It should be noted that it is difficult to deny access to walkers/horse riders and the like.	No change sought.	No	2(d)
23	1	Impressed with the provisions in the fire plan.	Fire plan has been amended. See Comment 1 this section.	Yes	1(d)
24	1	Suggest that more information should have been given, on fire history. JFNP is almost totally surrounded by residential lands, as well as rural lands. These areas represent both a high source of wildfires, as well as highly vulnerable assets that must be protected from fires that emanate from the Park.	Text amended.	Yes	1(e)
25	1	The location of the three fire regimes shown on Map 8 needs clarification and moderation.	Fire plan amended. See Comment 1 this section.	Yes	1(d)
26	1	Map 8 does not make reference to the Vegetation Management Regime.	Fire plan amended. See Comment 1 this section.	Yes	1(d)
27	1	Should be a connection between the Vegetation communities location (Map 6) and the Fire Regimes Map 8. Does this connection actually exist. If so, say so; if not, why not?	Fire plan amended. See Comment 1 this section.	Yes	1(d)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
28	1	Concern that there is not sufficient break up of heavy fuels within the Park. Attached maps with submission show a high likelihood of large fires burning in fuels greater than 8 t/ha throughout the Park. Fires can easily enter neighbouring lands as there is no effective low fuel buffer zones proposed on these initial boundaries.	Fire plan amended. See Comment 1 this section.	Yes	1(d)
29	1	Concern expressed over the location of the NPB area in the southern section of the Park. This area of heavy fuel is within 100 metres of the Swanview suburb and constitutes an unacceptable risk to life and property. This block should become a FRR regime area.	Fire plan amended. See Comment 1 this section.	Yes	1(d)
1	1	<p>7.6 Feral Animals and Domestic Pets <i>1 submission.</i></p> <p>A baiting program should be progressively introduced to rid the park of dogs, cats, foxes, pigs etc. There is evidence of wild pigs in the northern section of the Park. This control program is particularly important if Section 7.3, Rec 5 is to be implemented.</p> <p>7.7 Weeds <i>No submissions.</i></p> <p>7.8 Raw Material Extraction <i>No submissions.</i></p> <p>7.9 Rehabilitation <i>1 submission.</i></p>	Feral animal control programs are proposed.	No	2(d)
1	1	<p>Priority should be given to the following areas for rehabilitation:</p> <p>a) unused tracks particularly those eroded tracks in the western part of the park.</p> <p>b) planting of trees in areas of visual pollution eg. north eastern corner of the northern extension.</p> <p>c) quarry areas.</p>	<p>Support for plan.</p> <p>Covered in Recommendation 5, Section 7.5.</p> <p>Covered in Recommendation 2, Section 6.4.</p> <p>Covered in Recommendation 2, Section 6.4.</p>	No	2(a)
2	1	Supports Rec 3.	Support for plan.	No	2(a)
1	1	<p>8.0 CULTURAL RESOURCE MANAGEMENT <i>1 submission.</i></p> <p>Congratulated CALM for the content of the draft Management Plan and notes the commitment to cultural heritage.</p>	Support for plan.	No	2(a)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
		8.1 Aboriginal Heritage <i>2 submissions.</i>			
1	1	Expressed appreciation at the way the Aboriginal Heritage Issue has been addressed and support the recommendations made in this regard.	Support for plan.	No	2(a)
2	1	It could be useful to know the status of the Park before it was declared an 'A' Class reserve in 1900's, and obtain more information on Aboriginal involvement in the Park since then, particularly during the Depression period.	Action 6 has been added accordingly.	Yes	1(d)
3	1	More Aboriginal people should be given the opportunity to participate in all areas of management within the Park. Encourage CALM to run training programs and work experience for Aboriginal youth, make this one of the management goals.	Support for plan.	No	2(a, d)
4	1	Commends and supports the recommendations made in regard to Aboriginal Heritage. As the plan indicates relevant Noongar people should be strongly involved in the development and implementation of these strategies.	Support for plan.	No	2(a)
5	1	The original names of particular areas and features within the Park could be established, and where possible these then be adopted for general use.	This is acknowledged.	No	2(a, d)
6	1	The management plan should ensure the protection of religious and cultural values and ensure continued access of the Park for Nyungar people.	Action 3 has been added accordingly.	Yes	2(e)
7	1	The plan should recognised the contribution of Aboriginal culture and knowledge in the conservation of the Park.	Covered by Action 2.	No	2(a)
8	1	Aboriginal concerns and views about this Park must be noted and effort made to involve Nyungar in the management both as employees and in management committees.	Plan amended.	Yes	2(e)
		8.2 European History <i>No submissions.</i>			

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
		<p>9.0 COMMERCIAL RESOURCE MANAGEMENT</p> <p>9.1 Mining <i>No submissions.</i></p> <p>9.2 Utilities and Services <i>1 submission.</i></p>			
1	1	<p>Continuing and reasonable access for maintenance repair purposes to Telecom cables is required. A new Optical Fibre Trunk cable will be installed in the Park, restrictions on work timing and practices, in regard to forest dieback problems have all been discussed with Bill Adams.</p> <p>9.3 Beekeeping <i>No submissions.</i></p> <p>PART D. MANAGEMENT FOR RECREATION</p> <p>10.0 PRINCIPAL RECREATION DIRECTIONS <i>No submissions.</i></p> <p>11.0 RECREATION OPPORTUNITIES <i>No submissions.</i></p> <p>11.1 The Region <i>1 submission.</i></p>	Provision for new cable has been allowed for.	No	2(d)
1	1	<p>Rec 1 - Recreational Fishing has a historical basis in Park areas and has no evidence of environmental impact unlike a number of other historical and other practices which are recognised, serviced and will continue under this plan.</p>	No change sought.	No	2(b)
2	1	<p>Rec 2 - No attempt made to suggest alternative sites (for fishing).</p>	Not appropriate for CALM to suggest sites for fishing.	No	1(c)
3	1	<p>Rec 3 - No attempt to address this issue as it pertains to recreational fishing.</p>	See Comment 2 above.	No	1(c)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
1	2	<p>11.2 The Park 3 submissions. Advocate the rebuilding and operating of the old Eastern Mainline Railway through JFNP:</p> <p>1) With terminus in Swanview adjacent to Mannison Road, a current Transperth Bus route, whereby people could enter the Park utilising current bus services and the Railway.</p>	The proposal to rebuild and operate a railway system in the Park was thoroughly considered during preparation of the draft plan. The decision was made that visitor safety would be in jeopardy as the train would be in conflict with the Heritage Trail which is a very popular feature of the Park.	No	2(d)
2	2	2) The need to route Transperth into the Park would be eliminated. Traffic along the Park access road would be of smaller volume allowing existing roads to remain unchanged.	See Comment 1 above.	No	2(d)
3	2	3) Although the train would be travelling at slow speeds, the problem of the closeness of the heritage Railway and Walk Trail, must be viewed by intelligent observation, that very few railways are enclosed, and the public have access to the perway at all times ie. Whiteman Park, Hotham Valley and Westrail.	See Comment 1 above.	No	2(d)
4	2	4) The threat of danger to small children who may stray onto the railway is always present, but parental control would eliminate the problem.	See Comment 1 above.	No	2(d)
5	2	5) Organisations such as the Army would inspect the bridges and other infrastructures before construction commenced, to ensure sound construction.	See Comment 1 above.	No	2(d)
6	2	6) Sufficient equipment to operate a sensible timetable to transport the visitors.	See Comment 1 above.	No	2(d)
7	2	7) Steam locomotives would not run when fire bans were in force, alternative motive powers such as diesel would be used. Investigation into using natural gas for summer operations.	See Comment 1 above.	No	2(d)
8	2	8) Make the proposal to rebuild the National Park Station open for public comment.	See Comment 1 above.	No	2(d)
9	1	Rec 1 - It is viewed with concern that the recreational fishing group is denied access to the Park, to which they have had traditional access.	Fishing will be permitted under certain conditions. See amended objective and recommendations in Section 14.9 of Plan.	Yes	1(d)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
10	1	Rec 2 - No attempt has been made to identify recreational anglers as a special group or determine how to provide opportunities and facilities to meet these needs.	See Comment 2 above.	No	2(b)
11	1	Rec 3 - This is unlikely to provide adequate information for fishing and access needs.	Every attempt will be made to target all user groups when surveys or other methods of investigation are carried out.	No	2(b)
1	1	12.0 Access 3 submissions. Strongly oppose Rec 3.	Access was thoroughly assessed during the preparation of this plan. The proposed plan, endorsed by CALM's landscape architects is considered the optimal one.	No	2(d)
2	1	Can restrict after hours access to main facility area by locating a gate approximately 100 metres north of the Number 2 entrance. Allowing 24 hour vehicle access along the scenic drive with entry or exit through the Number 2 entrance.	See Comment 1 above.	No	2(e, f)
3	1	Change the alignment where the existing by-pass road joins the entrance into the main facility area ie. have a T-junction at the by-pass and shift the collection box up to this point and if people don't want to pay they can keep on driving. The proposed Beehive Road would terminate at the T-junction on Park Road at the bottom of a steep decline with a private residence directly opposite. This would be more dangerous than congestion which is currently occurring at the collection box.	See Comment 1 above.	No	2(d)
4	1	Better protection for Park facilities doesn't require the construction of an additional roadway. Once the tavern closes problems in relation to protection of the Park facilities may reduce substantially.	The plan does not state that tavern will close.	No	2(d)
5	1	If restricted access was considered a high priority after closure of the tavern in 1995, and a gate was placed near the Number 2 entrance as previously indicated, access for walkers after hours to the Glen Brook Dam, and to the lookout above the dam, could still be made from both Park Road and the scenic drive with appropriate sign posting.	See Comment 1 above.	No	2(d)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
6	1	Visitors would have to pay for facilities they can't see, they would not see the extent and scope of facilities or whether they were crowded or lightly utilised, which would result in a reduction in revenue.	No change sought.	No	2(b)
7	1	Rec 4 - Agree with (a), (b) but not (c). Although it would make a safer traffic flow and reduce the possibility of head on collisions, a certain percentage of potential Park visitors would be inconvenienced and this would be a retrograde step.	Safety and budgetary considerations will be prime factors in determining the best option for the scenic drive.	No	2(d)
8	1	Supports the upgrading of the Number 2 entrance rather than construction of a new road from Beehive corner to Park Road near Flora Road. The objective is to provide quality service to visitors to the Park and not the loss of a convenient entry/exit point because of cost considerations.	See Comment 1 above.	No	2(c)
9	1	In order to reduce traffic hazards along the scenic drive keep the curves tight and let road conditions set the speed limit.	See Comment 1 above.	No	2(d)
10	1	Strategy and Rec 3 should not be considered a high priority, but may only after further study be considered a medium or low priority as no cost-benefit analysis has been carried out in relation to the cost of the proposed 600 metres of new road and associated works in relation to the claimed benefits. 12.1 Car Parking <i>No submissions.</i> 13.0 RECREATION SITES <i>1 submission.</i>	Recommendation 3 is considered a high priority because of the financial benefits to CALM.	No	2(d)
1	1	Any concerns management has (p.65), can be resolved with the co-operation between all parties and, since July 1992, there has been minimal if any problems at the entrance. 14.0 RECREATION ACTIVITIES 14.1 Pleasure Driving and Sightseeing <i>1 submission.</i>	Genuine concerns remain and will be resolved by new access system. See Comment 1 Section 12.0.	No	2(b)
1	1	Rec 3 - These loop/walks could be positioned to service anglers.	This is not considered feasible	No	2(d)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
		14.2 Bushwalking <i>4 submissions.</i>			
1	1	Support for Recs, although guide and ranger age girls, may prefer more 'adventurous' walks and hikes.	Support for plan.	No	2(a)
2	1	In a pre-draft submission a new medium grade walk trail would be constructed. Discussions with CALM staff regarding rehabilitation work on adjacent eroded tracks has been met enthusiastically. When the draft management plan is endorsed we hope to use volunteers to implement this track in progressive stages.	Support for plan. No change sought.	No	2(a, b)
3	1	The use of brochures to inform visitors would be better than signs and plaques.	A combination of brochures, signs and plaques will be used to inform visitors.	No	2(d)
4	1	Rec 5 - Accommodate recreational anglers as per 11.2. Rec 2. Note there is a high level of servicing for bushwalkers which represent a smaller participation group than recreational anglers in the community.	Walk tracks service a wide variety of Park users.	No	2(d)
		14.3 Barbecuing and Picnicking <i>No submissions.</i>			
		14.4 Nature Appreciation <i>3 submissions.</i>			
1	1	Environmental programs/project could be of interest for badge work and service projects.	No change sought.	No	2(b)
2	1	A special guide-map brochure could be used to guide visitors in the Park.	This has been addressed.	No	2(d)
3	1	Rec 1 - Due to the close association of anglers with water and their desirability to get away from it all, means this group should be serviced not disadvantaged. The impact of anglers is significantly minimised by the provision of facilities rather than discouraging the practice.	Section 14.9 Fishing has been amended.	No	2(b)
		14.5 Camping <i>1 submission.</i>			
1	1	The present campsite is a very real security risk - do any guide age girls 11-15 years even use it? Back pack camping would be suitable for ranger section 18-25 years but security would still be a problem.	Alternative campsites are being investigated. Backpack camping is available in the Park.	No	2(a, d)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
		<p>14.6 Horse Riding (Proposal 1) <i>43 submissions.</i> The issue of horse riding in John Forrest National Park attracted the largest number of submissions. Two types of proforma were received in addition to many hand-written submissions from private individuals in favour of retaining horse riding in the Park (Proposal 1). The points raised in the proformas are summarised below.</p>	<p>Two alternatives were canvassed in the draft management plan to provide an indication of public opinion about horse riding in the Park. One proposal was to allow horse riding with some provisos and the other was to ban horse riding. While some people supported the latter proposal the majority of people who contributed a submission were against it. Horse riding will therefore continue in the Park with the proviso of phasing out if impacts on the Park involve cost to management that exceed benefits or if environmental damage is unacceptable.</p>		
1	28	Support for Proposal 1 (to allow horseriding in the Park with some provisions) and associated recommendations with some minor amendments.	Support for proposal	Yes	1(b,d)
2	26	Rec 1 - Disagree. Usage over past 30 years is evidence of Parks capacity to sustain horse riding. Consider repositioning some sections of trails subject to erosion due to inappropriate historical location.	The assessment will consider all environmental concerns.	Yes	1(b,d)
3	24	Rec 2 - Agree. Should involve appropriate equestrian body for wider use.	Support for proposal.	Yes	1(b, d)
4	26	Rec 3 - Agree. More CALM education through pony and adult riding clubs.	Support for proposal.	Yes	1(b, d)
5	24	Rec 4 - Agree. More trails would reduce incentive for illegal riding and would reduce the impact on existing trails.	Support for proposal.	Yes	1(b, d)
6	26	Rec 5 - Agree. In communication with rider groups.	Support for proposal.	Yes	1(b, d)
7	24	Rec 6 - Agree. Also more CALM education through pony and adult riding clubs.	Support for proposal.	Yes	1(b, d)
8	25	Rec 7 - Disagree. Appears to be pre-emptory indicating a time frame for phase-out of activity. Could substitute the word "alternative" with "additional".	Riding trails in the area will be investigated on a regional scale.	No	2(c, d)

<i>COMMENT NUMBER</i>	<i>NO. OF SUBS</i>	<i>SUMMARY OF COMMENT</i>	<i>DISCUSSION / ACTION TAKEN</i>	<i>PLAN AMENDED</i>	<i>CRITERIA</i>
9	25	Rec 8 - Disagree. Park ground is barren and does not support growth of non-native plants used for feeding horses. Establish volunteer groups to assist with weed control projects.	Will continue to encourage horse riders to feed their horses on a seed free diet before entering the Park and during their stay in the Park.	No	2(d)
10	24	Rec 9 - Agree. Changes to be made in liaison with interested groups. Invite volunteer groups to assist with monitoring projects.	Support for proposal.	Yes	1(b, d)
11	24	Rec 10 - Disagree. Use of Park for any activity should not be decided on basis of costs exceeding benefits. Given the legislative powers CALM has, the recommendation appears threatening and is clearly unnecessary. Recommendation should be deleted. Comments in support of retaining horse riding in the Park (Proposal 1) have been collated and summarised below.	If impacts of horse riding on the Park involve costs that exceed benefits then the activity will be phased out.	No	1(d)
12	20	Support continued use of the Park by horse riders (Proposal 1). Reasons: <ul style="list-style-type: none"> • The level of horse riding is very low and poses no threat to other Park users. • Never seen great soil erosion or weed infestations caused by horses. • The Park is a safe place for children to ride. • Banning sections of the general public is not normally acceptable or easily enforceable. • There have not been any incidents (in the last 35 years) that would warrant closing the Park to one section of the community. • Issues relating to the alleged conflicts and hazards between riders and walkers are not realistic. • There will be a loss of business viability if horse riding is disallowed in the Park. • The Park will lose a small core of enthusiasts who care deeply about the preservation of the Park if horse riding is disallowed. 	These are acknowledged. See Comments this section.	Yes	1(b,d)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
1	27	<p>Management Suggestions:</p> <ul style="list-style-type: none"> • Map of trails to be automatically despatched with every permit issued. • Fees could be increased though not prohibitively as the present fee is not excessive for 12 months. • A minority of horse riders would benefit from more signs, easier access to passes and general education. • Feeding of horses in the Park could be prohibited without causing stress to the horses. • It is appropriate to regulate use by commercial equestrian organisations if it exceeds a certain limit of numbers and frequency of use. • Registration fees should be kept minimal as it is expensive to own and keep a horse. • Provide further tracks in the north or north-east parts of the Park. • CALM and Local Government should design riding trails to which horse riding could be defined. • Should provide means of monitoring and eliminating the activities of the minority who put other users at risk. <p>Proposal 2 32 submissions. Rec 1 - Strongly disagree.</p> <ol style="list-style-type: none"> 1) Would result in younger riders being exposed to many dangers absent in the Park. 2) Most visitors are delighted to see horses in Park and often ask to allow children to touch them. 3) Loss of enjoyment to horse riders from opportunity to see remote areas and observe changing seasons in peace and tranquillity from horseback. 4) Loss of potential source of support for volunteer assistance projects. 5) Management requirements of commercial trail riding activities should not be lumped with or prejudiced against the family rider. 6) The literature indicating damage caused by horses, is based upon unrelated geographic areas and is unjustified concern, given the usage of the Park for this type of activity over the past 30 years. 7) Increase to the level of vandalism, as horse riders are concerned Park users, who would report offenders. 	<p>These suggestions were considered during the preparation of the management plan and will continue to be considered during the development of a code of ethics</p> <p>Refer to Comments this section.</p>	Yes	1(b, d)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
2	24	8) Loss of early warning of fires in remote areas of the Park. Rec 2 - Not applicable. Riding groups should be made aware of the impact that irresponsible riding activity can cause eg. dieback spread, erosion etc.	Refer to Comments this section.	Yes	1(b,d)
3	24	Rec 3 - Not applicable. 1) Many riders do not have horse floats and would have difficulty reaching alternative areas. 2) Negligible planning work has been done regarding trail networks within the Shire. 3) Alternative areas are insufficiently close or attractive and with no safe access.	Refer to Comments this section.	Yes	1(b,d)
4	5	Several submissions supported Proposal 2, ie. to disallow horse riding in the Park. Their reasons and suggestions are summarised below. Reasons: <ul style="list-style-type: none"> • Ecological impacts on the conservation estate, eg. introduction of weeds by way or horse manure. • Safety implications for other Park users (walkers) and for Rangers themselves. • Management difficulties caused by the impact of horses on firebreaks, particularly erosion. • The probable expansion of horse riding in time, making management more difficult than it is now. • Pollution of horse manure on public walk trails. • Conflict between horses and walkers. • Horse riders use Park as an exercise yard often leading 4-6 horses at a time. • Horses browse and trample vegetation widening damage alongside trails. • Horse riding is not compatible with the conservation values of the Park. Management Suggestions: <ul style="list-style-type: none"> • If horse riding is to continue, it should be on the user pays principle, and they pay for the privilege and upkeep of the trails - \$250 per year. • Could phase out horse riding over a 2 year period, followed by implementation of Recs 2 and 3. 	Refer to Comments this section. Horse riding will be managed and a code of ethics developed to minimise impacts with the proviso of phasing out if costs exceed benefits.	Yes	1(b,d)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
		<ul style="list-style-type: none"> Should ban feeding of horses in the Park (amend Rec 8). 			
1	1	<p>14.7 Cycling <i>1 submission.</i> On designated paths only (Rec 1) - may not be 'adventurous' enough for older girls but may suit brownie age, 7-10 years.</p>	All users will be considered with view of minimising conflicts.	No	2(d)
1	1	<p>14.8 Swimming <i>1 submission.</i> Rec 3. This is an example of circular thinking and runs counter to 11.2 Rec 2 for another significant user group. Provision of swimming and fishing in Glen Brook Dam will broaden the spectrum of recreational opportunity and enhance visitor appreciation.</p>	For comments on fishing and swimming see Comment 2 Section 6.3.	No	2(d)
1	1	<p>14.9 Fishing <i>1 submission.</i> The proposal to ban fishing in John Forrest NP should be deleted or scientific justification provided.</p>	Fishing objective and recommendations amended.	Yes	1(b,d)
2	1	The bibliography shows that there are no ecological studies of the impact of recreational fishing. There is also no aquatic checklist.	See Comment 1 above.	Yes	1(b,d)
3	1	The proposal to ban fishing in JFNP runs counter to all recommendations contained in 11.1 and 11.2	See Comment 1 above.	Yes	1(b,d)
4	1	BBQing, picnicking, camping, horse riding and cycling are likely to have greater impact on the environment than recreational angling, yet they are accommodated and serviced.	See Comment 1 above.	Yes	1(b,d)
		<p>14.10 Group and Club-based Activities <i>No submissions.</i></p>			
1	1	<p>14.11 Orienteering, Rogaining and Cross-Country Running <i>2 submissions.</i> If events are conducted using approved tracks only, they should be allowed. There is a perceived reluctance by the authorities to allow cross country events which do not use tracks.</p>	No change sought.	No	2(b)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
2	1	It is not (in our) experience that vegetation is trampled on courses as claimed on p. 76 of the draft plan. As events are held once a year and competitor numbers range from 5-30, it is extremely unlikely that any damage would be caused by the sport.	Events will be planned in consultation with Park staff to minimise disturbance to vegetation.	No	2(b)
3	1	The impact of participants' vehicles may be minimised by car-pooling and restricting the areas in which orienteers may park.	No change sought.	No	2(b)
4	1	Request that access for orienteers be allowed in the special conservation zone.	Access will not be allowed in Conservation Zone.	No	2(e)
		14.12 Off-Road Vehicles			
		<i>1 submission.</i>			
1	1	More control of illegal trail bikes in the northern sector. Effective containment of the official off-road area adjacent to the north east corner of the Park needs to be discussed with the appropriate authority.	This is acknowledged.	No	2(d)
		15.0 LEASES AND COMMERCIAL CONCESSIONS			
		<i>18 submissions.</i>			
1	15	Strongly supports the continuation of the Tavern facility within the Park.	See comment below.	No	2(d)
2	1	Within 6 months of the adoption of the Draft Plan, expressions of interest should be called for the lease of the Tavern, Restaurant, Tearooms and Kiosk to enable a new lease to commence when the present lease expires in 1995. At the same time, expressions of interest should be called from all parties including CALM for alternative and appropriate ways of enhancing visitor enjoyment with respect to the use of the Tavern, Restaurant/Tearooms and Kiosk buildings.	This is acknowledged. Arrangements for lease will be followed-up according to departmental policies and recommendations in this plan. Process will commence within six months of final plan being released.	No	2(d)
3	1	The Tavern would make an ideal visitors centre.	See comment above.	No	2(b)
4	1	The Tavern should be closed and removed from the Park.	See comment above.	No	2(b)
5	1	The tavern has been portrayed as something less than the enjoyable, recreational and cultural venue it is, and its translation is misleading.	Text amended.	Yes	1(b)

<i>COMMENT NUMBER</i>	<i>NO. OF SUBS</i>	<i>SUMMARY OF COMMENT</i>	<i>DISCUSSION / ACTION TAKEN</i>	<i>PLAN AMENDED</i>	<i>CRITERIA</i>
6	1	The last paragraph on page 77 is offensive, inaccurate and demonstrates the predisposed, biased attitudes against the Tavern by authors of the draft plan.	Text amended.	Yes	1(b)
7	1	The claim "the problem is exacerbated by the lack of ranger presence after hours", is extraordinary in the extreme. There is little ranger presence in the Park at any time.	Ranger presence is being addressed in plan.	No	2(d)
8	1	We live in the Park and from experience can say categorically any untoward behaviour by people visiting the Park after hours is invariably groups of people who have no association with the Tavern whatsoever.	The issue of untoward behaviour will be alleviated or resolved by upgraded access system; ranger presence; and provision for adequate visitor services.	No	2(d)
9	1	Due to the minimal rangers presence in the Park, the Tavern facility provides the following services: Public telephone, emergency service, toilet facilities and information Service.	No change sought.	No	2(b)
10	1	Termination of the Tavern licence would dramatically reduce the rental value of the complex, the old tearoom area could be adapted to provide an ideal information and interpretative centre; to operation in conjunction with the kiosk at no cost to the NPNCA.	See Comment 2 above.		
11	1	As the present lessees of the above Tavern we would welcome expressions of interest being called immediately so that planning for the future can be commenced as soon as possible.	See Comment 2 above.		
12	1	Rec 2- The tearoom/kiosk could be continued as a service to visitors to the Park.	See Comment 2 above.		
13	1	Rec 3 - The Tavern premises could be better used as an environmental education centre once the tavern lease expires. A tavern is an inappropriate commercial enterprise for a National Park and provides a facility which is commonly available elsewhere.	See Comment 2 above.		
14	1	Seven people are currently employed at the Tavern-Restaurant and a thorough study should be made before any decisions are made.	See Comment 2 above.		

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		16.0 BUILDINGS <i>No submissions.</i>			
1	1	17.0 SIGNS <i>1 submission.</i> Signage should be co-ordinated with guide map brochures.	This is acknowledged.	No	2(d)
		PART E. INFORMATION, INTERPRETATION AND EDUCATION			
		18.0 Information, Interpretation and Education <i>2 submissions.</i>			
1	1	Park brochures are needed for walkers and another for students. Why not use the Tavern as a visitor information centre?	Support for plan.	No	2(a)
2	1	There needs to be better opportunities for Aboriginal cultural education.	Recommendation added.	Yes	1(e)
3	1	Some recognition of Wylie and Noongale Kickett should be alongside John Forrest in the name.	Accept that recognition should be given to Aboriginal heritage.	No	2(b)
		PART F. RESEARCH AND MONITORING			
		19.0 RESEARCH AND MONITORING <i>No submissions.</i>			
		PART G. IMPLEMENTATION OF THE PLAN			
		20.0 PRIORITIES <i>1 submission.</i>			
1	1	11.2 Has the Park a visitor book?		No	2(b)
2	1	14.5 Camping. What about the fire season?		No	2(d)
3	1	14.6 Horse riding (Proposal 1) Point 2 - only if Park is found suitable to sustain horses. Point 8 is total rubbish.	See comments under 14.6 Horse Riding.	No	2(d)

COMMENT NUMBER	NO. OF SUBS	SUMMARY OF COMMENT	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
4	1	14.6 Horse riding (Proposal 2) turn points around to read: 1) Provide information on alternative areas available for horse riding. 2) Provide information to local horse riders etc. 3) Disallow horses in John Forrest National Park.	See comments under 14.6 Horse Riding.	No	2(d)
		21.0 STAFF AND FUNDING <i>2 submissions.</i>			
1	1	Strongly support Rec 4.	Support for plan.	No	2(a)
2	1	There should be more Aboriginal people employed.	CALM acknowledges this and has an affirmative action policy with regards to Aboriginal employment.	No	2(a)
		22.0 LIAISON <i>2 submissions.</i>			
1	1	Strongly supports Rec 2.	Support for plan.	No	2(a)
2	1	There should be Nyungar Elders on an Advisory or Management Committee.	Acknowledge that formal mechanism is needed for Aborigines to discuss with CALM. CALM is currently investigating this proposal.	No	2(a)
		23.0 EVALUATION AND REVIEW <i>No submissions.</i>			

APPENDIX 1. SUBMITTORS TO THE DRAFT MANAGEMENT PLAN

Individuals

Ansell, S.
Arthur, R.W.
Bond, J.P.
Bower, M.
Brereton, D.
Bull, W. & L.
Burgess, K.
Cleaver, C.R. & C.M.
Clemen, A. & R.E.
Criddle, N.
Dare, G.
Dear, A.
Earle, M.
Estermann, R.
Fischer, L.M.
Fischer, P.
Fitzgibbon, C.
Flynn, T.
Gisardin, C.
Grosse, P.
Hampsey, M.
Hare, Z.
Hargst, D.
Harrison, Z.
Hendry, P.
Hickman, Dr A.H.
Juniper, R.
Kay, P.
Kotai, J.
Mills, D.
Mills, S.
Moiler, J.
Morgan, P.N.
Morris, J.
O'Dwyer, N.
O'Neill, R.
Oates, M.
Oliver, S.
Pember, B.L. & A.J.
Readhead, J.
Robertson, M.
Ryan, K.
Ryding, J.

Sept, F.
Spiniello, T.
Toovey, C.
Tresidder, K.
Unknown
White, S.
Wilson, I.
Wiltshire, S.

Clubs, Organisations and Associations

Bugle Tree Creek-Jane Brook Protection Society
Equestrian Federation of Australia Inc.
Girl Guides Association of W.A. (Inc)
Hovea Residents & Ratepayers Assoc. Inc
John Forrest Heritage Railway Inc.
John Forrest Rider's Association
National Park Ranger's Association
Orienteering Association of W.A. (Inc)
Perth Bushwalkers Club Inc.
Telecom Australia
United Nyungah Tribes Circle of Elders
W.A. Wildflower Society

Government Agencies

Bush Fires Board
Dept of Conservation and Land Management
Dept of Minerals and Energy
Heritage Council of W.A.
Main Roads Department
Recreational Fishing Advisory Committee
Shire of Mundaring
Shire of Swan
W.A. Museum
W.A. Museum - Aboriginal Sites Dept.
W.A. Tourism Commission

