ANALYSIS OF PUBLIC SUBMISSIONS

to the Draft Management Plan

for

Lesueur National Park

and

Coomallo Nature Reserve

Department of Conservation and Land Management
for the
National Parks and Nature Conservation Authority
Perth, Western Australia, 1995

INTRODUCTION

This document is an analysis of public submissions to the draft management plan for Lesueur National Park and Coomallo Nature Reserve (1994).

During the preparation of the draft plan, the Department of Conservation and Land management (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
- forming an advisory committee.

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

The Lesueur National Park and Coomallo Nature Reserve draft management plan was released for public comment on 30 August 1994, by the Minister for the Environment, the Hon. Kevin Minson MLA, at a public meeting held in Jurien. 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 two months until 9 November 1994. Individual requests for an extension of the submission period were granted and late submissions were accepted. A total of 17 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 Lesueur National Park and Coomallo Nature Reserve 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 submision 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 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
All of the submissions were 'substantial', i.e. no proformas or petitions were received. The number and place of origin of submissions are listed below.

	Number	Percentage
CALM Employees	2	12
Community - Individuals	7	41
Community - Organisations	4	23
Government Agencies	3	18
Commercial Operators	1	6
	17	100

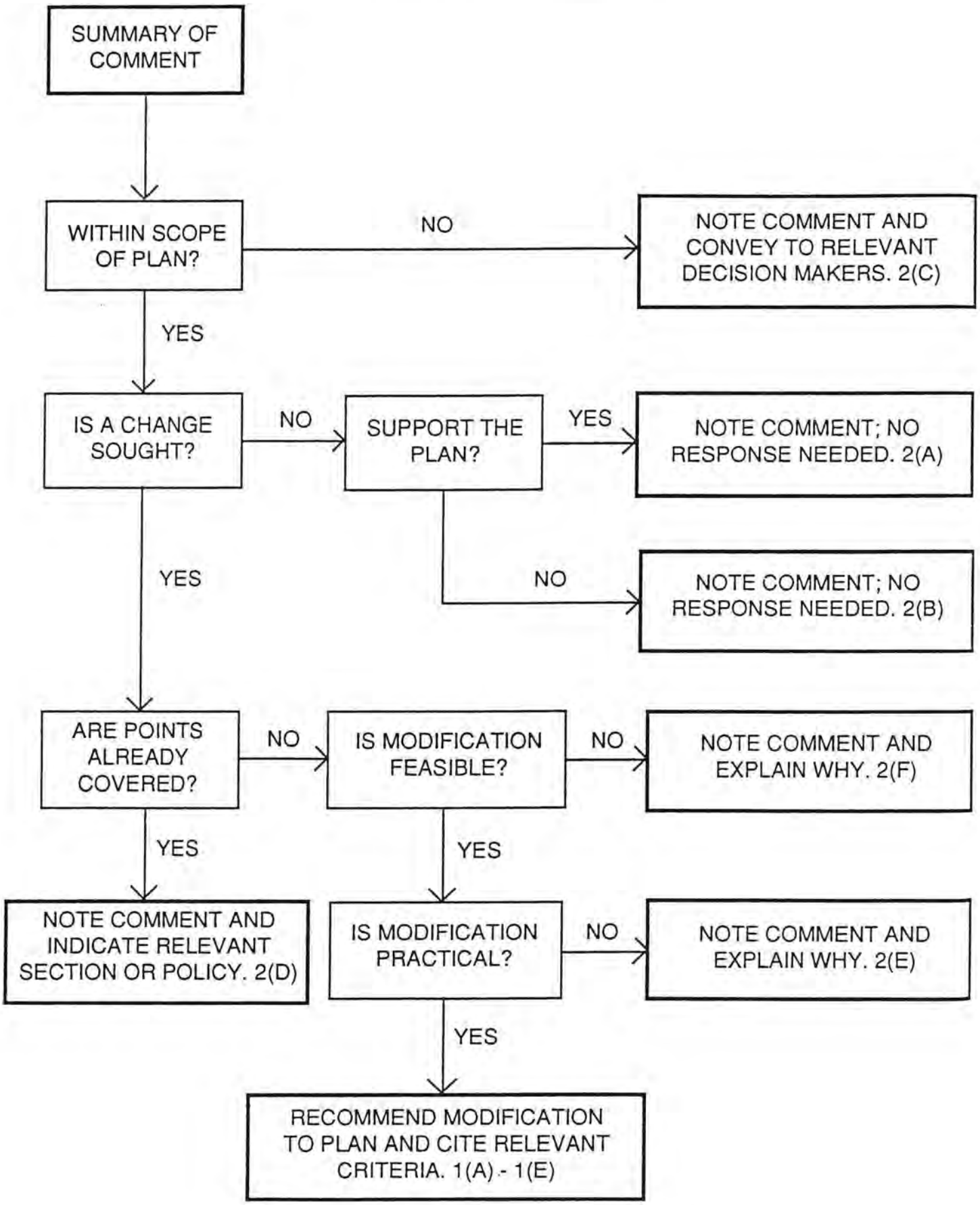
A list of the submittors to the Lesueur National Park and Coomallo Nature Reserve draft management plan is given in Appendix 1. Two submissions were marked 'confidential' and their authors remain anonymous.

ANALYSIS TABLE

The Analysis Table contains five columns:
- Summary of Comments: a summary of each comment made on the draft plan;
- Number of Submissions: the number of submissions pertaining to each comment;
- Discussion/Action Taken: a discussion on why the comment did or did not result in an amendment to the draft plan, or an indication of what action was taken in the final 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.

FIGURE 1

ANALYSIS PROCESS



SUBMISSION COMMENTS	No. of SUBS	DISCUSSION	PLAN AMENDED	CRITERIA
General Comments				
• Congratulations on the draft management plan.	5	General comment only.	No	2(a,b)
• Strongly support the draft management plan.	2	General comment only.	No	2(a)
• The management plan should also encompass Drovers Cave National Park.	2	A separate management plan will be prepared for this Park.	No	2(c,d)
• The plan shows the benefits of early consultation between CALM and the Department of Minerals and Energy.	1	General comment only.	No	2(b)
• Overall, the draft plan seems well integrated.	1	General comment only.	No	2(b)
• There is no discussion on commercial flower picking even if to say that it is totally prohibited.	1	Not appropriate in a Class 'A' National Park.	No	2(d)
1.1 Brief Description				
• Further flora collection has increased the known species occurring in Lesueur National Park to over 900 spp., including several possibly new species not yet described.	1	Text amended.	Yes	1(a,e)
3.0 Land Tenure				
• The addition of neighbouring land to extend the reserve and for corridor connection should be a high priority before it is cleared for other purposes.	1	This is acknowledged in plan.	No	2(d)
• Lot 10351 (CRA Pty Ltd) would give valuable connection to Coomallo NR as a fauna corridor.	1	This is acknowledged in plan.	No	2(a)
• Reserve No 40544 would be a wonderful addition to Lesueur and give protection to the coastal wetlands.	1	Recommendation added.	Yes	1(e)
• Plan does not give direction for Reserve 40544 after construction of the coast road.	1	Information added for clarity.	Yes	1(e)
• Plan gives no recommendations on future of gravel reserves 42031 and 35593 after the leases expire.	1	Information added for clarity.	Yes	1(e)
• Need to clarify the proposed tenure and objectives for the Coomallo picnic ground, Reserve 29901, i.e. conservation park or nature reserve?	1	Text amended for clarity.	Yes	1(e)
• A proactive approach should be taken to acquire those lands identified for inclusion in the conservation estate, i.e. Loc. 10351 and Reserve 24276.	1	Supported in plan.	No	2(a)
• Coomallo Nature Reserve should be considered for upgrading to 'A' class.	1	Recommendation added.	Yes	1(d)
• An Environmental Report for the proposed road between Jurien and Greenhead is being prepared. It is intended that a nominal 100 m wide road reserve be established for this road. The eastern boundary of the road reserve is supported as the western boundary of Lesueur where they abut.	1	No change sought.	No	2(b)
4.0 Management Zones				
• The zoning scheme seems satisfactory and should aid appropriate management.	1	No change sought.	No	2(b)
• The eastern part of Lesueur should be designated as a 'limited access' area under the CALM Act (1984) to make the recommendation for limited access workable.	1	Restricted access is a condition of special conservation zoning.	No	2(f)
• How is it proposed to 'strictly control' access in the special conservation zone?	1	No change sought.	No	2(b)
• Vehicle access to the salt lake complex should be denied owing to the irreparable damage by bogged vehicles, i.e. reconsider access conditions in natural environment zones.	1	Text amended.	Yes	1(d)

SUBMISSION COMMENTS	No. of SUBS	DISCUSSION	PLAN AMENDED	CRITERIA
• It appears that the recreation zone is a sacrifice zone and we doubt that the conservation values of the area can be satisfactorily protected.	1	By its definition the recreation zone includes public access for motorised vehicles. Minor loss of vegetation will occur with construction of the road.	No	2(d,e)
• Recommendation 1 should be rejected. A revised zoning scheme should omit the recreation zone or place such a zone in the natural environment zone given the high conservation status of the Park and the risk of introducing dieback.	1	See comments above.	No	2(d)
• Support the exclusion of vehicle access to the conservation zone and carefully controlled access to the natural environment zone.	1	No change sought.	No	2(a)
6.1 Geology, Landforms and Soils				
• This section should also refer to mineral and petroleum resources. [Suggested addition included in submission].	1	Information added for clarity.	Yes	1(a)
• Minor editorial changes suggested.	1	Text amended.	Yes	1(e)
• Two caves are located just south of the Coorow - Green Head Road adjacent to the Park's western boundary. It is unclear whether they fall inside or outside the Park.	1	Text amended.	Yes	1(a)
• A complete survey of this area for caves and karst features has not been conducted and further caves and karst features are likely to occur in the 'Natural Environment' zone of the Park. An inventory of these features should be conducted.	1	Text amended.	Yes	1(a)
• Obtain assistance from speleological groups to classify the caves and karst features.	1	Speleological groups will be consulted.	Yes	1(a)
• Perform ongoing inventories of internal cave features to ensure the cave classification adequately defines the appropriate level of management for each cave.	1	Speleological groups will be consulted.	Yes	1(a)
• Encourage the formation of a Statewide Cave Management Advisory Committee to provide expertise on cave and karst management.	1	Beyond the scope of the plan.	No	2(c)
• Recommendation 2 is weak. There should be specific recommendations excluding certain activities that will adversely impact on important geological features.	1	The impact of operations on geological features will be assessed.	No	2(d)
6.2 Water Catchments and Hydrology				
• Section on groundwater is accurate.	1	No change sought.	No	2(a,b)
• One cave in Drovers Cave National Park contains the only known stream in any of the caves in this region. Ongoing study of this stream and the complex hydrology of the caves in the region should be encouraged.	1	Beyond the scope of the plan. Research into the hydrology of Lesueur National Park will be encouraged.	No	2(c)
• The Cockleshell Gully remains as the only surviving example of a northern coastal plain river flowing through low rainfall areas of scrub-heath. The lower part of the river passes through cleared land and consideration should be given to creating a vegetated buffer along the stream to better connect it with the wetlands which lie along the coast.	1	Beyond the scope of the plan.	No	2(c)
• Access to groundwater in the Park for use outside the Park should not be permited.	1	Recommendation added.	Yes	1(d)
• The impact of use of groundwater must be investigated before any source is developed for use in the Park.	1	Recommendation amended.	Yes	1(d)
6.4 Flora				
• Perhaps a resurvey of the delicate (rare flora) areas is warranted to enable them to be protected forever by a special act of parliament.	1	Class 'A' national park is the highest protection level available.	No	2(d)

SUBMISSION COMMENTS	No. of SUBS	DISCUSSION	PLAN AMENDED	CRITERIA
6.5 Fauna				
• Given the presence of permanent water within the Park some assessment of fish fauna is warranted, with consequent recommendations for its management should that be necessary. It is possible that this stream system supports the northern most populations of one or more freshwater species, e.g. the western minnow (*Galaxias occidentalis*).	1	This is acknowledged and covered in Recommendations p.30-31.	No	2(d)
7.1 Plant Diseases				
• Dieback washdown facilities at the entrance to the Park should be installed, not just considered, with a high priority. CALM and all other personnel, e.g. Bush Fires Board, should uses these facilities at all times.	2	Existing recommendation is the most practicable.	No	2(d,e)
• I am reassured to see the high priority given to dieback protection.	1	No change sought.	No	2(a,b)
• Special emphasis should be placed on preventing any spread of plant diseases by strictly controlling all human activities.	1	This is acknowledged in plan.	No	2(d)
• If necessary, close the Park to the public and machinery during winter to help stop dieback spreading.	1	Temporary closure of public access is provided for.	No	2(d)
• A more hygienic time to visit the Park would be in summer or when foot baths for sterilizing have been installed.	1	Temporary closure of public access is provided for.	No	2(d)
• There is no evidence that hygiene procedures developed for *P. cinnamomi* will be effective against *P. citricola* or *P. megasperma* which can readily produce resilient spores in soil.	1	This is acknowledged.	No	2(d)
7.2 Fire Protection				
• The public should be allowed the use of fire management access tracks and firebreaks with the prior permission of CALM, provided that procedures to prevent the spread of dieback can be implemented.	1	Fire management tracks are for management vehicles only. Walkers are generally permitted on these tracks.	No	2(f)
• I am reassured to see the high priority given to fire protection.	1	No change sought.	No	2(a,b)
• We are pleased at the attention given to fire management and that fires over most of the reserve at once should become less and less likely as the plan is implemented.	1	No change sought.	No	2(a,b)
• The realignment of boundary firebreak tracks should be specifically approved in the plan to eliminate the danger to fences, provide wider firebreaks, and avoid unnecessary delays and increases in paperwork in approving necessary operations for each case.	1	This is covered in Recommendation 11.	No	2(a,d)
• The fire management policy of this Park should be reviewed along with the general policy.	1	Beyond the scope of the plan.	No	2(c)
• Fire control measures may increase the spread of dieback.	1	This is acknowledged.	No	2(d)
• Insufficient attention has been given to the spread of dieback in formulating Recommendation 7 on the development of scrub-rolling buffers.	1	The spread of dieback has been given highest consideration in all management recommendations.	No	2(d)
7.3 Introduced Animals				
• Recommend that the laughing kookaburra be removed from the listing of introduced animals which are intended to be subject to control programs.	1	Kookaburras are introduced animals from eastern Australia.	No	2(c)
• I am reassured to see the high priority given to eradicating feral animals and weeds.	1	No change sought.	No	2(a,b)
9.0 Recreation Opportunities				
• There must be careful balance between allowing for some 4WD access to some areas in the Park while not encouraging excessive use of 4WDs.	1	No change sought.	No	2(b)

SUBMISSION COMMENTS	No. of SUBS	DISCUSSION	PLAN AMENDED	CRITERIA
10.0 Access and Recreation Sites				
• Coomallo's first priority is a low maintenance, vandal proof ablution block.	1	Supported in plan.	No	2(a)
• Suggest moving paragraph 3 (p.57) forward so that it rest after "For most of its length ... discussed above."	2	Text amended.	Yes	1(e)
• Banovich Road entrance was closed without consultation.	1	Extensive consultation did take place.	No	2(d)
• Sealed roads should not be provided.	1	This is acknowledged.	No	2(d)
• Only ploughed or graded tracks should be provided for use by approved 4WD operators.	1	Access conditions wil apply to approved 4WD operators.	No	2(d)
• Support a short vehicle road and more walking tracks.	1	Supported in plan.	No	2(a)
• Closure of 4WD tracks in Lesueur is another restriction on a user group trying to pursue their chosen recreation.	1	4WD vehicles may still access natural environment zones.	No	2(b)
• The Banovich Road access could be made a seasonal closure to prevent use during wet weather while still maintaining 4WD access to the Park.	1	4WD vehicles are not appropriate in special conservation zones.	No	2(d)
• Management tracks should not be closed to the general public.	1	Management tracks are for management vehicles only. Walkers are generally permitted on these tracks.	No	2(f)
• The proposed loop road should be deleted from the access plan because:	2	The section of road from Cockleshell Gully Road to the proposed day use area will follow the approximate alignment shown on Map 8. Additional access, which may include a loop or an alternative exit through Cockleshell Gully, will be thoroughly assessed for dieback susceptibility and engineering feasibility, and will be subject to detailed flora and fauna survey.	Yes	1(a,d)
- no feasibility study was carried out into the alignment of the road;	1			
- it would be extremely difficult and expensive to construct;	1			
- the Lesueur Fault is sensitive in terms of soil stability and flora composition;	1			
- the road would impact on the only population of *Grevillea batrachioides* in the area and on other rare flora.	1			
- high risk of introducing dieback would place the Cockleshell Gully catchment at risk of disease;	1	See comments above.	Yes	1(a,d)
- the provision of an access road conflicts with CALM policy statement 18 section 1.8.3 which restricts vehicle access (to prevent introducing disease) where the values of the land are under threat;	1	See comments above.	Yes	1(a,d)
- it is difficult to think of an area of higher priority in terms of disease protection (rated with Fitzgerald River and Stirling Range National Parks).	1	See comments above.	Yes	1(a,d)
- the provision of road access conflicts with Section 6.3, Recommendation 2 and Section 6.5, Recommendation 1 in the draft plan.	1	See comments above.	Yes	1(a,d)
- it is incredible that Recommendation 9 of Section 7.1, to pursue any opportunity to decrease the potential of users to introduce disease to Coomallo, does not apply to Lesueur where a new road is proposed.	1	See comments above.	Yes	1(a,d)
- if disease risk has been factored into positioning the road into Lesueur, isn't the fact that public washdown facilities are being considered at the Park entrance an admission that *Phytophthora* is likely to be introduced?	1	See comments above.	Yes	1(a,d)
• The continuation of the proposed road to Cockleshell Gully should have higher priority because:	1	See comments above.	Yes	1(a,d)
- the gully contains woodlands more suitable for recreation facilities due to the shade;				
- it would allow closer walk trail access to the coal seam area.	1	See comments above.	Yes	1(a,d)

SUBMISSION COMMENTS	No. of SUBS	DISCUSSION	PLAN AMENDED	CRITERIA
• The walk trail up the slope of Mt Lesueur should not proceed because: - it seems foolish to risk the main feature of the Park to satisfy the desire to see from a high point when other vantage points occur, e.g. Lesueur Fault; - we risk the scenic qualities of the mesa and endanger at least five species of DRF; - if dieback infected the walk trail, loss of vegetation will accelerate erosion and contribute to any visual impairment.	1	The concept of a walk trail up Mt Lesueur, or an alternative vista point, will be fully investigated in the site development plan taking due regard to environmental values.	Yes	1(a,d)
• Coomallo picnic ground should not have provision for campfires.	1	Covered in Fire Section Recommendation 14.	No	2(d)
• If toilets at Coomallo are considered, then their proximity to Coomallo Creek and the resources to maintain them must also be considered.	1	This is acknowledged.	No	2(d)
• If CALM is to overtake the Coomallo parking area who will maintain it? Will it still be used as an overnight stopping place?	1	CALM will be responsible for its maintenance. Overnight camping will not be permitted.	No	2(d)
11.1 Bushwalking				
• CALM will need to provide parking facilities at trail heads, and will need to determine how many vehicles should be accommodated at these areas.	1	Text amended.	Yes	1(e)
• Disagree with the construction of walk trails due to the increased risk of introducing plant diseases. Free range walking would be more appropriate.	1	Properly managed walks will better achieve management objectives.	No	2(e,f)
11.2 Camping				
• The plan should delineate the designated backpack camping areas in order to inform those likely to use these facilities.	1	Information for backpackers will be made available as plan is implemented.	No	2(d)
• Will CALM have the staff to police this activity?	1	Backpackers will be required to register with CALM rangers.	No	2(b)
• No provision for camping has been made for larger vehicle based groups.	1	Opportunities for large group camping are available in other	No	2(d)
• Many (of our club members) rely on their vehicles for camping, and experience much inconvenience if separated from their vehicles by pine barriers or isolated campsites.	1	areas within the district.	No	2(d)
• Fully endorse the recommendation that camping be restricted to backpack camping only.	1	Supported in plan.	No	2(a)
• Free range backpack camping would be more appropriate.	1	Designated backpack campsites would better achieve management objectives.	No	2(e,f)
11.3 Group and Club-based Activities				
• What activities could be provided for groups which a charge could be levied, and why restrict charges to groups alone?	1	Recommendation 4 deleted.	Yes	1(e)
• There should be guidance as to what access is proposed to be allowed or encouraged above and beyond the normal public access route.	1	Recommendation 3 reworded.	Yes	1(e)
13.0 Domestic Animals				
• Delete the sentence that 'Many other areas near Jurien ... where domestic animals are allowed'.	1	Text amended.	Yes	1(e)
• Clarify Recommendation 1 to indicate the Coomallo picnic area.	1	Recommendation amended.	Yes	1(e)
• Recommendation 3 should read 'Inform visitors <u>of</u> the reasons why ...'	1	Recommendation amended.	Yes	1(e)

SUBMISSION COMMENTS	No. of SUBS	DISCUSSION	PLAN AMENDED	CRITERIA
14.1 Commercial Operators				
• Tourism must be strongly controlled and confined to selected operators ... with strict regard to their track record of operation.	1	This is acknowledged.	No	2(d)
14.2 Mining, Mineral and Petroleum Exploration				
• Every effort must be made to ensure mining does not occur.	3	No change sought.	No	2(a,b)
• This section is accurate and presents the data in a factual manner.	1	No change sought.	No	2(a,b)
• Minor editorial changes suggested.	1	Text amended.	Yes	1(e)
• Existing tenements over the Park should be terminated and no more granted.	1	Beyond the scope of the plan.	No	2(c)
14.3 Basic Raw Material Extraction				
• (We) do not support basic raw material extraction from the Park.	1	Comment is noted.	No	2(e)
• What and who determines the absence of other suitable sources?	1	CALM, DOME and the relevant Shires determine resource availability.	No	2(b)
• The procedure for extraction of raw materials should be flexible in that if the taking of such material from Parks and Reserves will have less impact than if taken from other sources, such as private property, then CALM should consider this option closely.	1	Extraction of basic raw materials is regulated under the Local Government, CALM and Mining Acts.	No	2(e)
• Consideration of the impact of cutting access tracks from private properly and noxious weeds on private property should be made.	1	Beyond the scope of the plan.	No	2(c)
14.4 Utilities and Services				
• There is a powerline which services the Grigson farm which traverses Lesueur on Cockleshell Gully Road.	1	Information added for clarity.	Yes	1(e)
• Support Recommendation 1.	1	No change sought.	No	2(a,b)
14.5 Apiculture				
• Sites in the special conservation zone should be cancelled and any relocation only considered outside that zone.	1	Covered in Recommendation 3.	No	2(d,e)
15.0 Information, Interpretation and Education				
• CALM should provide readily accessible information regarding, and facilitate, access to Park rangers, such as by providing a timetable of Ranger visits to specified locations in or adjacent to the Park.	1	Information on ranger accessibility will be provided. This is covered in Recommendation 2.	No	2(d)
• A full visitor information centre should be set up in Jurien.	1	Beyond the scope of the plan.	No	2(c)
16.0 Interaction with the Community and other Authorities				
• Fully support a 'Friends Group' of local people to assist Park rangers in policing the area and on small maintenance jobs.	1	Supported in plan.	No	2(a)
17.0 Research and Monitoring				
• I am reassured to see the high priority given to monitoring flora and fauna.	1	Supported in plan.	No	2(a)

SUBMISSION COMMENTS	No. of SUBS	DISCUSSION	PLAN AMENDED	CRITERIA
18.0 Management Structure and Staff Resources				
• Adequate funding should be made available to implement the plan as soon as possible.	2	No change sought.	No	2(a,b)
• Will CALM increase staffing to monitor use to protect the area from people and vehicles?	1	Increased ranger patrols will occur.	No	2(d)
19.0 Priorities				
• Items 6.1, 6.2, 6.3, 6.4, 6.5 should be given a high priority rather than medium. These are the values that make the Park unique.	1	These items do have high priority.	No	2(d)

APPENDIX 1. LIST OF SUBMITTORS

Community - individuals

L. Boshammer
M. Hatch
D. James
S. & M. Telford
Dr E. Wajon
Confidential 1
Confidential 2

Community - organisations

Armadale 4WD Club
Australian Speleological Federation
Conservation Council of W.A.
Royal Australasian Ornithologists Union

Government Agencies

Department of Conservation and Land Management
Department of Minerals and Energy
Main Roads W.A.
Water Authority of W.A.

Commercial Operators

Safari Treks