

Nambung National Park

Analysis of Public Submissions



MANAGEMENT PLAN NO 37



Department of Conservation
and Land Management



National Parks and Nature
Conservation Authority

ANALYSIS OF PUBLIC SUBMISSIONS
to the Draft Management Plan
for
Nambung National Park
Wanagarren Nature Reserve
Nilgen Nature Reserve
Southern Beekeeper's Nature Reserve

Department of Conservation and Land Management
for the
National Parks and Nature Conservation Authority
Perth, Western Australia, 1998

CONTENTS

	Page
INTRODUCTION	iii
ANALYSIS OF PUBLIC SUBMISSIONS	iii
Method of Analysis	iii
Number and Origin of Submissions	iv
ANALYSIS TABLE	iv
ANALYSIS PROCESS	v
ANALYSIS OF PUBLIC SUBMISSIONS	
General Comments	1
1.0 Overview	1
1.1 Brief Description	1
1.2 Public Participation	1
2.0 Management Goals and Objectives	2
2.1 Primary Objectives	2
2.2 NPNCA and CALM Management Policies	2
2.3 Management Goals	2
LAND USE MANAGEMENT	
3.0 Land Tenure	2
3.1 Boundaries and Land Tenure	2
3.2 Surrounding Land... ..	3
4.0 Management Zones	6
MANAGEMENT FOR CONSERVATION	
5.0 Geology, Soils, Landforms and Coastal Processes	7
6.0 Hydrology	9
7.0 Vegetation and Flora	9
8.0 Fauna	10
9.0 Cultural Heritage	10
10.0 Landscape Management	11
MANAGEMENT FOR PROTECTION	
11.0 Fire Protection	11
12.0 Plant Diseases	11
13.0 Introduced Plants and Animals	11
14.0 Rehabilitation	12
RECREATION AND TOURISM	
15.0 Recreation Strategy	12
16.0 Recreation Opportunities	12
17.0 Access	13
18.0 Recreation Areas... ..	16
19.0 Recreation Activities	17
19.1 Nature Appreciation	17
19.2 Bushwalking	17

	Page
19.3 Picnicking and Barbecuing	17
19.4 Camping	17
19.5 Group and Club-based Activities	18
19.6 Recreational Fishing	18
19.7 Boating	19
19.8 Horse-riding	19
20.0 Commercial Visitor Services	19
21.0 Domestic Animals	20
22.0 Visitor Safety	20
 COMMUNITY RELATIONS	
23.0 Information, Interpretation and Education	20
24.0 Community Involvement	21
 COMMERCIAL AND OTHER USES	
25.0 Commercial Fishing	21
26.0 Mining, Mineral and Petroleum Exploration	21
26.1 Basic Raw Material Extraction	22
27.0 Utilities and Services	22
28.0 Apiculture	22
 RESEARCH AND MONITORING	
29.0 Research and Monitoring	22
 IMPLEMENTATION	
30.0 Management Structure and Staff Resources	22
31.0 Priorities and Review	22
 APPENDICES	
Appendix 1. State Government Squatter Policy	23
Appendix 2. Landscape Character Types	23
 LIST OF SUBMITTORS	 24

INTRODUCTION

This document is an analysis of public submissions to the draft management plan for Nambung National Park and Wanagarren, Nilgen and Southern Beekeeper's Nature Reserves (1995).

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 and flyers;
- conducting land-based and aerial surveys of visitors and commercial operators;
- advertising in local and Statewide newspapers; and
- forming an Advisory Committee.

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

The Nambung National Park and Wanagarren, Nilgen and Southern Beekeeper's Nature Reserves draft management plan was released for public comment on 10 October 1995, by the Minister for the Environment, the Hon. Peter Foss MLA, at a public meeting held in Nambung National 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 two months until 15 December 1995. Individual requests for an extension of the submission period were granted and late submissions were accepted. A total of 28 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 Nambung National Park and Wanagarren, Nilgen and Southern Beekeeper's Nature Reserves 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 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) was one amongst several widely divergent viewpoints received on the issue and the recommendation of the draft plan was still considered the best option; or
- (f) contributed options that were not feasible (generally due to conflict with existing legislation, Government or Departmental 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
Community - Individuals	4	14
Community - Organisations	7	25
Recreation Groups	8	29
Government Agencies	<u>9</u>	<u>32</u>
	28	100

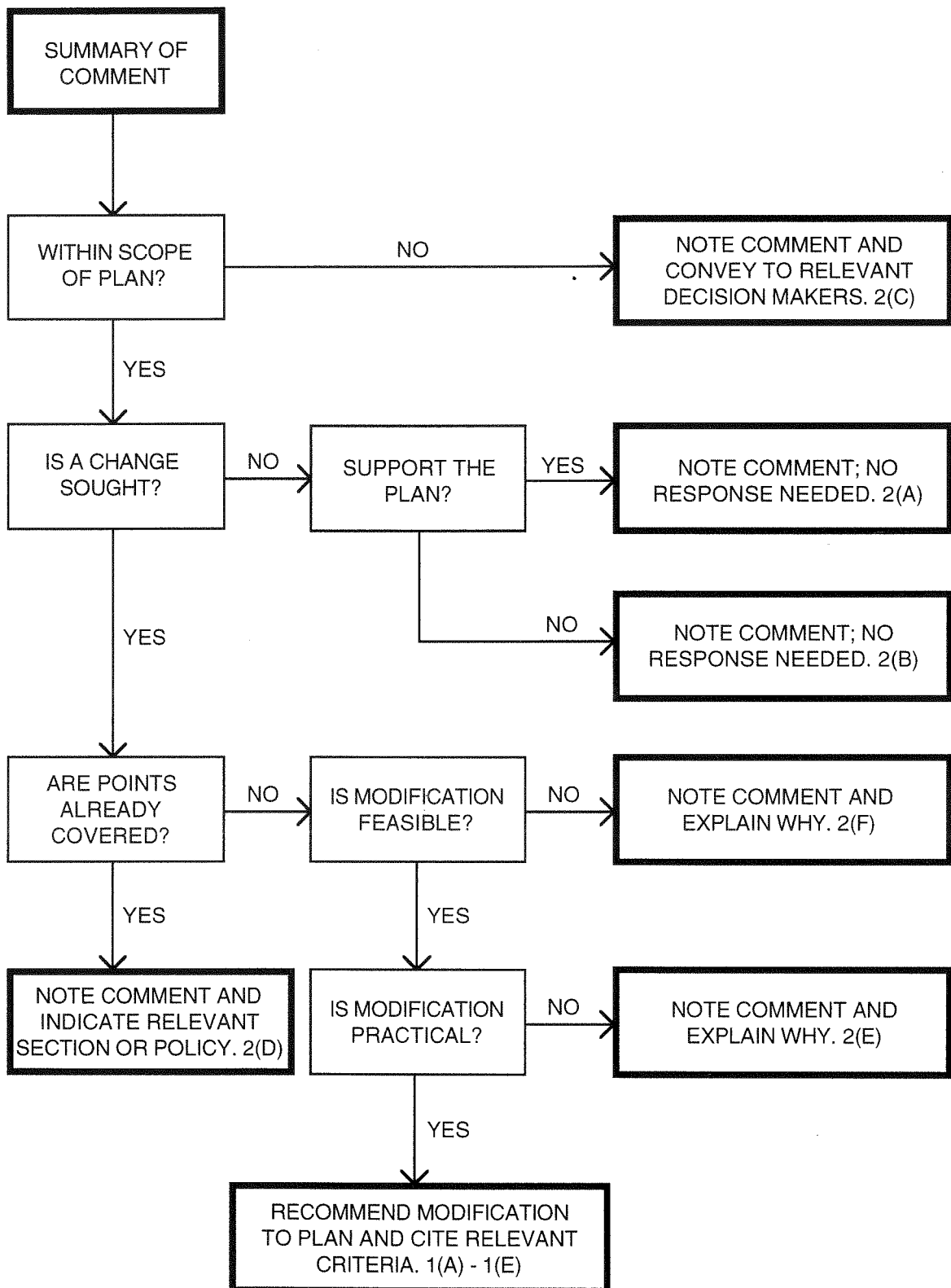
A list of the submitters to the Nambung National Park and Wanagarren, Nilgen and Southern Beekeeper's Nature Reserves draft management plan is given in Appendix 1.

ANALYSIS TABLE

The Analysis Table contains three columns:

- **Submission Comments:** a summary of each comment made on the draft plan with reference to 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 the criteria by which each comment was assessed.

ANALYSIS PROCESS



SUBMISSION COMMENTS (Number of Submissions)	DISCUSSION / ACTION TAKEN	PLAN AMENDED
<p>General Comments 8 submissions.</p>		
<p>1. (We) commend the NPNCA and CALM for their efforts in the establishment of the DMP. (1)</p>	Support for plan.	No 2(a,b)
<p>2. Congratulations on the quality of the DMP much of which would provide good reading for tourists. (1)</p>	Support for plan.	No 2(a,b)
<p>3. One of the most vital aspects of a management plan for this Park, namely the management of the Pinnacles, is hardly addressed at all. (1)</p>		Yes 1(e)
<p>4. The plan is fundamentally flawed by proposing to protect the flora and fauna of the area while implementing a program of commercialisation.(1)</p>		No 2(b,d)
<p>5. That the DMP proposes to weaken the reserve system and tailor the vesting and management objectives to accommodate existing activities is most disappointing. CALM has an obligation to ensure the conservation of flora and fauna over and above accommodating recreational demands. This obligation has been sidelined in this DMP. (1)</p>		No 2(d)
<p>6. The DMP has not made use of existing data from the Central Coast Regional Profile (DPUD, 1994) which provides important information on the region's geology and vegetation. (1)</p>	This report was fundamental in the preparation of the DMP.	No 2(d)
<p>7. This plan called for public input, however, item 2(f) page (ii) tends to deliberately exclude such comment. (2)</p>		No 2(d)
<p>8. The DMP is a predictable composition which one would expect from people who are opposed to our (squatter) community staying intact. (1)</p>		No 2(b)
<p>9. The DMP is nothing more than a land grab by this Government through CALM and the Dandaragan Shire. (1)</p>		No 2(b)
<p>1.0 OVERVIEW</p>		
<p>1.1 Brief Description</p>		
<p>No submissions. See other sections.</p>		
<p>1.2 Public Participation</p>		
<p>1 submission.</p>		
<p>1. No input has been sought from the Grey Community Association by the Advisory Committee. The Association was not advised that the townsite was to be incorporated into the Park, nor were we specifically asked to be involved in the Advisory Committee. (1)</p>	The State Government is committed to the removal of squatters' shacks through the implementation of its Squatter Policy. Issues concerning squatters are beyond the scope of this management plan.	No 2(c,d)
<p>2. The questions in the survey made no reference to whether the respondents were visitors to or occupiers of shacks (ALDs). (1)</p>		No 2(d)

SUBMISSION COMMENTS (Number of Submissions)	DISCUSSION / ACTION TAKEN	PLAN AMENDED
2.0 MANAGEMENT GOALS AND OBJECTIVES		
<i>2 submissions.</i>		
1. Support the management goals and objectives with a view to conservation. (2)	Support for plan.	No 2(a)
2.1 Primary Objectives		
<i>1 submission.</i>		
1. The primary objective for national parks would be satisfied by the Grey Community Association's proposal for leasehold land to be made available (see 3.2 Surrounding Land). (1)	The State Government is committed to the removal of squatters' shacks through the implementation of its Squatter Policy. Issues concerning squatters are beyond the scope of this management plan.	No 2(c)
2.2 NPNCA and CALM Management Policies		
<i>No submissions.</i>		
2.3 Management Goals		
<i>1 submission.</i>		
1. The recreation and tourism goal would be satisfied by the Grey Community Association's proposal for leasehold land to be made available (see 3.2 Surrounding Land). (1)	See Comment 1 above.	No 2(c)
2. The community relations goal would be satisfied by the Grey Community Association's proposal for leasehold land to be made available (see 3.2 Surrounding Land). (1)	See Comment 1 above.	No 2(c)
3.0 LAND TENURE		
3.1 Boundaries and Land Tenure		
<i>6 submissions.</i>		
1. Camping and 4WD activities must be allowed to continue in the nature reserves but controlled access should be implemented. (1)	Refer to 17.0 Access, 18.0 Recreation Areas and 19.4 Camping.	No 2(d)
2. Support the proposed tenure changes in Table 1. (2)	Support for plan.	No 2(a)
3. While acknowledging that 'many activities taking place in the nature reserves are illegal', the proposed solution is to change the category to make them legal! Such a response is an abnegation of responsibility. (1)	The thrust of the management plan is to control and manage recreation activities to minimise environmental damage and conflict between users.	No 2(d)
4. To down-grade Nilgen Nature Reserve to Conservation Park without providing scientific data of the area's environment as a rationale for the decision is unacceptable. Nilgen should be vested as an 'A' class nature reserve. (1)	Nilgen is currently a 'C' class reserve. The plan proposes to upgrade it to an 'A' class conservation park.	No 2(d)
5. Amending Southern Beekeeper's Reserve to 'A' class should be delayed pending finalisation of land exchanges. (1)	The change to 'A' class may take an extended period and should not affect proposed land exchanges.	No 2(d)
6. Support the change to 'A' class for the Southern Beekeeper's reserve provided that 'Water Supply' be included as a purpose of vesting in addition to Apiculture and Conservation of Flora and Fauna. (1)	The change to 'A' class will not preclude future water supply.	No 2(d)

<i>SUBMISSION COMMENTS (Number of Submissions)</i>	<i>DISCUSSION / ACTION TAKEN</i>	<i>PLAN AMENDED</i>
3.2 Surrounding Land		
<i>14 submissions.</i>		
1. Support the proposal to incorporate Lake Thetis into the Park. (3)	Support for plan.	No 2(a)
2. Support the inclusion of all areas as listed in Table 2. (2)	Support for plan.	No 2(a)
3. The investigation of acquiring CG 2490 must be thorough, and attempts to integrate this key block must be the subject of strenuous efforts. (3)	Support for plan.	No 2(a,b)
4. CG 2490 contains 50 plus caves which take the overflow of the Nambung River after heavy winter rains. It contains Strathmore Cave, which is well decorated containing some of the best speleothems north of Perth. (2)	Support for plan.	No 2(a,b)
5. The southern section of a 'slip road' from the coastal highway will be Hanson Bay Road. The western side of the slip road should remain Crown land and public open space. A lookout hill on the western side of Hanson Bay Road is marked for development as a tourist feature of Cervantes, perhaps incorporating a nature/walk trail from Hanson Point to the town. (1)	The area concerned is outside the scope of this plan.	No 2(c)
6. Why wasn't the area known as 'Tombstone Rocks' near Coomadoora included in this study? (1)	Tombstone Rocks occur on leasehold land outside the study area.	No 2(c)
7. Reserve 19206 is vested in the Shire of Dandaragan for the purpose of 'Parkland, Recreation and the Letting of Cottages existing thereon' and not for Public Utilities. (1)	Plan amended.	Yes 1(e)
8. Should mention that the Shire has resolved to implement the State Government Squatter Shack Policy for Reserve 19206, and that the shacks are due to be removed by the year 2001. (1)	Plan amended.	Yes 1(c,e)
9. Reserve 19206 should be vested in the NPNCA and managed for its environmental values including water resource values in its relict drainage channels. (1)	Existing recommendation accommodates potential vesting in NPNCA.	No 2(d)
10. It is understood the portion of the stock route affected is a small area at the southern end. There is concern if more of the stock route is involved as it has previously been used for public works. As Jurien expands, more land will be required for public works and there should be a reservoir of reserves available to accommodate these requirements. (1)	A small portion of the stock route south of the Hill River abuts the Southern Beekeeper's Nature Reserve. It is proposed to include this area in the reserve.	No 2(b)
11. The owners of CG 3392 recognise the land's relationship to the Hill River and consider that the future of this land should be discussed in relation to the proposed Cervantes land exchanges and road alignment. (1)	This is acknowledged.	No 2(d)

Analysis of Public Submissions

<i>SUBMISSION COMMENTS (Number of Submissions)</i>	<i>DISCUSSION/ ACTION TAKEN</i>	<i>PLAN AMENDED</i>
12. Caution should be exercised in relation to making reserves 'A' class as this tends to have the affect of quarantining land from other uses.(1)	This is acknowledged.	No 2(d)
13. Consider retaining road reserve no. 15441 as access to coastal tracks which lead to Wedge Island through the Defence Training Area. (1)	Access will be retained but the road reserve will become part of the nature reserve.	No 2(d)
14. The Hill River estuary should be vested in the NPNCA as part of an 'A' class reserve together with the VCL river corridors. (1)	Plan amended.	Yes 1(d)
15. Support acquisition of Loc. 3392 but the area to the north-west of the river, and forming pt Loc. 9615, should also be purchased to become part of a continuous river reserve rather than being incorporated within the Southern Beekeeper's reserve. (1)	Existing recommendation facilitates management by amalgamating into one reserve.	No 2(d)
16. The portion of the Old North Road Stock Route should also be incorporated into a continuous river reserve rather than the Southern Beekeeper's reserve. (1)	See Comment 15 above.	No 2(d)
17. Support the inclusion of reserves 33048, 36093 and 855 within a continuous river reserve. (1)	See Comment 15 above.	No 2(d)
18. VCL east of Nambung NP should be incorporated within the CALM estate with status similar to that proposed for the Southern Beekeeper's reserve, for 'Conservation of Flora and Fauna, and Water'. Some or all of a number of existing reserves could be included. (1)	Plan recommends investigation of this possibility.	No 2(d)
Expansion of Cervantes		
19. There is insufficient information for the public to make an assessment of the comparative values and what might be gained or lost in the proposed swaps. More detailed information should be made available to assess the advantages and disadvantages of land swaps. (1)	Proposed land exchanges were discussed at length with the Advisory Committee.	No 2(d)
20. The alignment of the proposed road shown on Map 3 is likely to change and therefore the proposed land exchanges may need to be altered to reflect the adjusted alignment. Reserves potentially affected are 36053 and 19206. (1)	The final boundaries of proposed land exchanges will be determined following a more detailed review of conservation values, townsite requirements and pending the final alignment adopted for the coast road.	No 2(d)
21. It is apparent that within the authorities there is the belief that with the demise of Grey, there will be a substantial increase in demand for land in Cervantes. The townsite cannot offer the alternative lifestyle dwellers an acceptable alternative to what they already have. (1)	No change sought.	No 2(b,c)
22. Loc. 3117 (Dingo Swamp) should be acquired as part of the Beekeeper's reserve. (1)	The plan allows for the acquisition of suitable areas.	No 2(d)
Grey and Wedge Point Squatter Areas		
23. Oppose removal of the squatters and/or the shacks. (5)	The State Government is committed to the removal of squatters' shacks through the implementation of its Squatter Policy.	No 2(f)

<i>SUBMISSION COMMENTS (Number of Submissions)</i>	<i>DISCUSSION / ACTION TAKEN</i>	<i>PLAN AMENDED</i>
24. Squatters have probably prevented the uncontrolled commercial development of the area. (1)	No change sought.	No 2(b)
25. Grey is no longer a townsite and Table 2 should be corrected by deleting the word 'townsite'. (1)	Plan amended.	Yes 1(e)
26. Include references to Wedge and Grey as: Wedge - Reserve No. 43283 Melbourne Location 4153; and Grey - Reserve No. 43284 Melbourne Location 4152. (1)	Plan amended.	Yes 1(a)
27. Delete '2000' and replace with '2001', paragraph 6, page 9. (1)	Plan amended.	Yes 1(e)
28. Add to last sentence, paragraph 7, page 9: 'These matters will be resolved during the lease period of the squatters, and will be the subject of a separate limited Management Plan for Wedge and Grey.' (1)	Plan amended.	Yes 1(a)
29. Recommend that an area within Melbourne Location 4153 known as Wedge Island be made available for long term leasehold so permanent holiday accommodation can be included in the management plan. (2)	The State Government is committed to the removal of squatters' shacks through the implementation of its Squatter Policy. See also section 18.0 Recreation Areas.	No 2(c,d)
30. Recommend that the management plan provide a plan for Wedge Island in which the Progress Association could be involved both financially and with the implementation of the plan. (2)	See Comment 29 above.	No 2(c,d)
31. Over 260+ current owners are willing to pay CALM over \$1.5 million during the next 6 years cognisant of the fact that no services will be supplied, and after this period they have to demolish their dwelling at their own cost. CALM will lose considerable income at the termination of these leases and yet the costs of maintaining the area will no doubt increase exponentially in the future. (3)	See Comment 29 above.	No 2(c,d)
32. The provision of permanent residences for professional fishermen on economic grounds is now redundant as technology has improved boats and equipment. (1)	See Comment 29 above.	No 2(c,d)
33. If provision can be made for full time occupation by fishermen, whose impact is far greater than the average alternative lifestyle, there can be no argument that similar provision cannot be made for other users. It should not be implied or assumed that fishermen and/or their workers care for the environment more than the occupiers of shacks (ALDs). (2)	See Comment 29 above.	No 2(c,d)
34. It appears this DMP wishes to destroy a community that has stood the test of time and replace them with a sterile caravan park or camping area used by people without the affinity and responsibility to the area. (3)	See Comment 29 above.	No 2(c,d)

SUBMISSION COMMENTS (Number of Submissions)	DISCUSSION/ ACTION TAKEN	PLAN AMENDED
35. Recommend that areas of land at Grey be made available for leasehold to permit the development of a completely new concept of accommodation and to enable the private ownership or leasing of permanent holiday accommodation and residences to be included in the park plans. (1)	See Comment 29 above.	No 2(c,d)
36. Recommend that the management plan acknowledge the interest of the Grey Community Association in the future use of the area by providing for our members to contribute to the ideals and financing of the future use of the area. (1)	See Comment 29 above.	No 2(c,d)
37. It is very unjust of the DMP to promote the view that occupiers of shacks have little concern for their environment or that they are responsible for many or all of the problems unique to the area. Examples include p. 1 (column 2 para 3), p. 47 (Utilities and Services, para 2). (2)	The plan refers to the environmental impacts associated with squatter areas and not personal attitudes of squatters.	No 2(d)
38. If it is not possible to retain Grey, then a suitable alternative needs to be created within a framework that is acceptable to the authorities. (1)	Beyond scope of plan.	No 2(c)
39. There is no mention that the Flat Rocks area was left in a disgraceful state by CALM for nearly 10 years. (1)		No 2(d)
40. Could consideration be given to retaining the Wedge settlement as part of our history? Could proposed facilities for this pocket at Wedge be combined with retention of the current shacks? (1)	See Comment 29 above.	No 2(c,d)
41. Pre-existing tenure should entitle current leaseholders first rights at land or commercial opportunities in the future. (1)	See Comment 29 above.	No 2(c,d)
Defence Training Area		
42. A 4WD track provides access in close proximity to the training area boundary posing safety concerns. Consideration should be given to realigning this track further east of the training area. (1)	This area is part of the DTA and is outside the scope of this plan.	No 2(c)
43. Consideration should be given to allowing 4WD beach access from the southern boundary of the artillery impact area northwards towards Wedge Island. (1)	This area is part of the DTA and is outside the scope of this plan.	No 2(c)
4.0 MANAGEMENT ZONES		
<i>2 submissions.</i>		
1. The Pinnacles zoned as 'recreation zone' is an appalling decision. They are a site of international geomorphological significance and it is completely inappropriate not to categorise them under 'natural environment'. (1)	The 'recreation' zone provides for stricter management control over the projected increase in visitor use of the Pinnacles.	No 2(d)
2. Under the 'natural environment' zone the landscape should be given management priority as well as the plants and animals. (1)	Plan amended.	Yes 1(e)

SUBMISSION COMMENTS (Number of Submissions)	DISCUSSION / ACTION TAKEN	PLAN AMENDED
<p>3. The proposed management zones are a complete compromise to allow current activities on the fragile coastal strip to continue. This is not acceptable. Urgent consideration should be given to zoning more of the coastal ecosystems as 'natural environment' zones based on more thorough investigation of the comparative ecological values and a clear commitment to maintenance of biodiversity. (1)</p>	<p>Recreation will be permitted under strict conditions, and limited to specific sites within this broad zone. Refer to Map 10 and section 19.4 Camping.</p>	<p>Yes 1(e)</p>
<p>MANAGEMENT FOR CONSERVATION</p>		
<p>1 submission.</p>		
<p>1. (We) acknowledge the recommendations for all topics in this section. (1)</p>	<p>Support for plan.</p>	<p>No 2(a,b)</p>
<p>5.0 GEOLOGY, SOILS, LANDFORMS AND COASTAL PROCESSES</p>		
<p>9 submissions.</p>		
<p>1. The coastal primary dune system between Wedge Island and midway to Flat Rock has remained unchanged for at least 20 years through the efforts of WIPA members. (1)</p>	<p>No change sought.</p>	<p>No 2(b)</p>
<p>2. Careful planning can allow for buildings on the primary dune so that a maximum of pleasure, child supervision and safety can be obtained for its occupants. (1)</p>	<p>Comment noted.</p>	<p>No 2(d)</p>
<p>3. Descriptions of the geology, landforms and caves do not clearly indicate that all of these features are closely interrelated and are formed as a result of karst processes. (1)</p>	<p>Plan amended to give cohesion to sections.</p>	<p>Yes 1(a)</p>
<p>Caves</p>		
<p>4. CALM should investigate the potential for development of caves as tourist attractions. Such attractions could be made exclusively available to passengers on licensed tours. (3)</p>	<p>Caves in the Park are generally small in size, difficult to access and have limited potential as tourist attractions.</p>	<p>No 2(d)</p>
<p>5. The DMP does not appear to consider Nambung National Park as a karst region but rather as distinct features within a karst landscape. It is imperative that the final management plan addresses this issue. (2)</p>	<p>Plan amended to give cohesion to sections.</p>	<p>Yes 1(a)</p>
<p>6. 'Stalagmites', 'helictites' and 'troglobitic' are spelled incorrectly. (2)</p>	<p>Spelling errors corrected.</p>	<p>Yes 1(e)</p>
<p>7. The size of cave entrances is critical for the survival of troglobitic lifeforms. (1)</p>	<p>No change sought.</p>	<p>No 2(b)</p>
<p>8. Control of cave meteorological conditions needs consultation with speleological groups, and control over the number of visits to sensitive caves. (1)</p>	<p>Support for plan.</p>	<p>No 2(a)</p>
<p>9. The aim should be to keep commercial and constant visitation away from caves of scientific interest, and to direct the public to caves more capable of supporting the greater visitation. Brown Bone Cave is the only cave that may meet this condition. (1)</p>	<p>See Comment 4 above.</p>	<p>No 2(d)</p>

Analysis of Public Submissions

<i>SUBMISSION COMMENTS (Number of Submissions)</i>	<i>DISCUSSION / ACTION TAKEN</i>	<i>PLAN AMENDED</i>
10. The geomorphology of many of the caves and karst features can be linked directly to the Nambung River and hence its significance in karst management should be clearly stated in the plan. (1)	Plan amended.	Yes 1(a)
11. Less than 100 karst features are actually known from the Park and Reserves. Caves are a relatively rare resource in the Park given the size of the karst (refer p. 13). (1)	Plan amended.	Yes 1(e)
12. The use of the word speleotherm is incorrect as it refers to temperature gradients in karst regions. Speleothem is the correct term. (1)	Spelling error corrected.	Yes 1(e)
13. Further explanation of the extremely important cave dwelling animals should be included in the plan. (1)	Text added.	Yes 1(a)
The Pinnacles		
14. The DMP erroneously mentions that 'the pinnacles themselves are resilient to handling.' Some are but many are not. (1)	Text amended.	Yes 1(e)
15. The statement that 'the softer limestone and some of the smaller structures are fragile and prone to damage by visitors' is an immense understatement. Pinnacles formed of softer limestone are easily damaged by people, particularly children, climbing on the structures. (1)	Text amended.	Yes 1(e)
16. Small hills of partially consolidated lime sand are particularly important as they contain within them fossil soil horizons that have been dated to about 8 000 years BP, and they form an important part of the story of the formation of the pinnacles. Some of these small hills have disappeared completely due to constant climbing on by people seeking better views. (1)	Information included in plan.	Yes 1(a)
17. Fossilized plant roots (rhizoliths) in the interpinnacle area have been virtually completely destroyed due to uncontrolled access. These are particularly instructive in showing the first stage of pinnacle formation, and the importance of the secondary cementation of plant roots. (1)	Information included in plan.	Yes 1(a)
18. The source of information concerning the formation of the pinnacles should be acknowledged. (1)	Source of information acknowledged.	Yes 1(e)
19. No mention is given of providing opportunities for increasing visitor knowledge and appreciation of the pinnacles as is done under section 7.0 Vegetation and Flora. (1)	Recommendation added.	Yes 1(d)
20. Rec. 1: "Consider the vulnerability of ..." Surely it is incumbent upon a management plan to not just consider something, but to propose some methods for managing the area for which CALM is responsible. (1)	It is the intent that the vulnerability (of geological features etc) will be taken into account in all management operations.	No 2(d)

<i>SUBMISSION COMMENTS (Number of Submissions)</i>	<i>DISCUSSION / ACTION TAKEN</i>	<i>PLAN AMENDED</i>
21. Rec. 1: Reword to include '... such as new access, firebreaks, fire management plans, catchment alterations and site developments.' (1)	Recommendation reworded.	Yes 1(d)
22. Rec. 2: Reword to 'In consultation with speleological groups, complete a resource inventory, classification system and access policies for caves and karst features in the area.' (1)	Recommendation reworded.	Yes 1(d)
23. Rec. 3: Reword to 'Liaise with speleological groups and other karst management specialists regarding management and other operations that are likely to impact on karst features.' (1)	Recommendation reworded.	Yes 1(d)
6.0 HYDROLOGY		
<i>5 submissions.</i>		
1. Support for Objective 2. (1)	Support for plan.	No 2(a)
2. The hydrogeology of the Park has been summarised in the plan, however, greater reference to A. Kern's Hydrogeology Report (1988/43) could have been made. (1)	Reference acknowledged.	Yes 1(e)
3. The hydrology and hydrogeology are the main features that sets Nambung National Park apart. All karst features and vegetation have developed in response to past drainage and run-off. (1)	Information included in plan.	Yes 1(e)
4. Add Rec. 7: Consult with other government agencies and adjacent land owners to devise land use agreements to ensure the long term conservation of river catchments.' (1)	Recommendation 2 expanded to include DEP and other Government agencies.	Yes 1(e)
5. The DMP fails to recognise that the stromatolites develop only in association with karst and must also be considered part of the karst landscape. (1)	Information included in plan.	Yes 1(e)
6. This section should be more specific in dealing with future water supplies to Cervantes, and mention the likelihood of a new borefield within the Southern Beekeeper's Reserve. (1)	Information included in plan.	Yes 1(a)
7. Rec. 1 should be amended to '... in the vicinity of existing and possible new borefields.' (1)	Plan amended.	Yes 1(e)
7.0 VEGETATION AND FLORA		
<i>3 submissions.</i>		
1. Rec. 2: Supported. (1)	Support for plan.	No 2(a)
2. Rec. 3: Supported. Organisations (such as ours) should be encouraged to assist with the construction and maintenance of facilities according to the expertise available. (1)	Support for plan.	No 2(a)

<i>SUBMISSION COMMENTS (Number of Submissions)</i>	<i>DISCUSSION / ACTION TAKEN</i>	<i>PLAN AMENDED</i>
3. The occurrence of tuart north of the Cervantes Road is significant in being near the extreme limit of tuart's range. If this occurs in the Beekeeper's Reserve it should be mentioned in the plan. (1)	Information included in plan.	Yes 1(a)
4. An additional recommendation could be considered along the lines of taking measures to protect tuart population from severe fires. (1)	Covered by Recommendation 5.	No 2(d)
5. The relatively fragile vegetation needs to be protected from visitation, especially by opening no new roads and restricting the number of vehicles on existing tracks and firebreaks. (1)	This is acknowledged.	No 2(d)
8.0 FAUNA 2 submissions.		
1. The present locked caves at Nambung fortuitously protect most of the troglobitic fauna. Some caves not so protected may, in time, need similar protection should the level of visitation increase. (1)	This is acknowledged.	No 2(d)
2. Caves that have been damaged by guano extraction, such as Super Cave, still support considerable populations of pseudoscorpions at times. (1)	Information included in plan.	Yes 1(a)
3. Support for Rec. 3. (1)	Support for plan.	No 2(a)
9.0 CULTURAL HERITAGE 5 submissions.		
1. Love of this land is not the prerogative only of Aboriginals. Most of the alternative lifestylers have a strong empathy to the environment. The traditional 'shackie' concept and the communities it has produced should not be deftly swept aside and forgotten just so bureaucratic ideologies can be pursued. (2)	References to European cultural significance are made throughout the plan.	No 2(d)
2. Investigations should be undertaken to identify opportunities to develop Aboriginal cultural attractions. To provide for a truly authentic Aboriginal experience, operators of Aboriginal heritage could be employed as tour guides. (1)	CALM has been unsuccessful in finding local Aboriginal groups with any ties to the area.	No 2(d)
3. Rec. 5: An opportunity may exist for the Association of 4WD Clubs, or individual clubs, to assist in the development of the old North Road Stock Route in consultation with the relevant authorities. (1)	Comment noted.	No 2(b)
4. The development of a Heritage Trail along the old stock route would impact negatively on sensitive caves. These may be considered as items of interest along the trail, but the sensitive nature of the caves may be difficult to convey to the public and builders of the trail. (1)	Comment noted.	No 2(b)

<i>SUBMISSION COMMENTS (Number of Submissions)</i>	<i>DISCUSSION / ACTION TAKEN</i>	<i>PLAN AMENDED</i>
10.0 LANDSCAPE MANAGEMENT		
<i>1 submission.</i>		
1. CALM's initial lack of responsible action in the Flat Rocks area goes against the guidelines for landscape management. (1)	No change sought.	No 2(b)
11.0 FIRE PROTECTION		
<i>4 submissions.</i>		
1. (We) agree to all recommendations. (1)	Support for plan.	No 2(a)
2. Rec. 5: Designated campsites should have some type of facility for a fire, such as the round concrete bullpits with swinging hot plate that CALM has installed in other national parks. All wood will have to be brought in otherwise only gas fires could be used. (1)	Wood fires are prohibited at all times.	No 2(d)
3. Maybe a season could be implemented for campfires so as to restrict the chances of a bush fire in the hottest part of the year. (1)	Wood fires are prohibited at all times.	No 2(d)
4. Some caves contain troglobitic animals important to science. Most of these caves are in the no-burn area and this policy should remain in force to prevent habitat degradation. (1)	Support for plan.	No 2(a,b)
5. The fire protection plan should have considered the research conducted on fires in karst areas (e.g. Holland, 1993). The impact of fires on karst is not mentioned in the DMP. (1)	Information included in plan.	Yes 1(a,e)
6. Add Rec. 3 under Prescribed Burning: 'Burn plans will contain edge burns at identified cave and karst sites that are considered highly vulnerable to damage from fires.' (1)	All proposed burns are edge burns.	No 2(d)
12.0 PLANT DISEASES		
<i>4 submissions.</i>		
1. Potential to spread dieback will be catastrophic with the increase in traffic arising from a coastal road through the Park. (2)	This is acknowledged. New roads will be subject to the strictest hygiene requirements and design specifications.	No 2(d)
2. Rec. 4: No effort has been made by authorities in the past to utilise squatters to disseminate information on plant diseases or introduced plants. (1)	No change sought.	No 2(b)
3. Support the current policy to exclude most private vehicles from the banksia areas to the north of Warrup and Wyup Pools which need protection from dieback. (1)	Support for plan.	No 2(a)
13.0 INTRODUCED PLANTS AND ANIMALS		
<i>2 submissions.</i>		
1. Wild dogs frequent the area to be included in the National Park. The plan should address the issue of control, at least to the extent of preventing wild dogs moving onto surrounding farming country. (1)	Wild dogs aren't considered to be a problem in the reserves.	No 2(d)

<i>SUBMISSION COMMENTS (Number of Submissions)</i>	<i>DISCUSSION / ACTION TAKEN</i>	<i>PLAN AMENDED</i>
2. Add Rec. 3: 'Sensitive cave and karst sites will be monitored for introduced species and eradicated as soon as practicable.' (1)	Covered in Recommendation 2.	No 2(d)
14.0 REHABILITATION <i>No submissions.</i>		
15.0 RECREATION STRATEGY <i>1 submission.</i>		
1. All of these requirements would be satisfied by the Grey Community Association's proposal for leasehold land to be made available (see 3.2 Surrounding Land). (1)	No change sought.	No 2(b)
16.0 RECREATION OPPORTUNITIES <i>5 submissions.</i>		
1. (We) acknowledge the recommendations. (1)	No change sought.	No 2(b)
2. The objective would be satisfied by the Grey Community Association's proposals (see 3.2 Surrounding Land). (1)	No change sought.	No 2(b)
3. Rec. 1: All sporting and recreation clubs should be consulted prior to the implementation of development works particularly commercial works. (1)	Major commercial works programs are developed by the District in consultation with appropriate groups.	No 2(d)
4. Rec. 4: Support integrated approach. However, there is a need to consider canvassing the users of these facilities, i.e. the visitors and the tour operators, to ascertain the requirements and expectations of these key users. (1)	This is acknowledged.	No 2(d)
5. Rec. 5: Support local authorities promoting their municipality. However, the Midlands Regional Travel Association and the Central West Coast Association have a specific marketing charter and play an important role in the promotion of significant tourist attractions. (1)	Support for plan.	No 2(a)
6. Rec. 6: Should clearly state that visitors should not climb the pinnacles. (1)	This is acknowledged.	No 2(d)
7. Recs 2, 4, 6 and 7 would be satisfied by the Grey Community Association's proposals (see 3.2 Surrounding Land). (1)	No change sought.	No 2(b)
8. Survey results would be interesting, particularly the number of adverse comments on the (squatter) settlements and whether such settlements affected their use of the coast. Obviously the survey conducted was not taken at Wedge Island. (2)	Some information is available through the District office.	No 2(d)

SUBMISSION COMMENTS (Number of Submissions)	DISCUSSION / ACTION TAKEN	PLAN AMENDED
17.0 ACCESS 15 submissions.		
1. Basic questions concerning access to the pinnacles are not addressed in the DMP. These include whether unrestricted access should be continued, is the current road the best way to go, or should visitors be made to walk? (1)	Conditions of access to the Pinnacles are currently being reviewed as a follow up to the management plan. Recommendation 3 amended to include geological formations.	Yes 1(d,e)
2. Proposals by Grey Community Association would satisfy the requirement of continued guaranteed 'user pay' funding for access. (1)	No change sought.	No 2(b)
Coast Road		
3. The impacts associated with a coastal road and the increase in tourists cannot be compatible with the DMP to preserve the integrity of the area. (3)	A coastal road link between Green Head and Lancelin was proposed in the Central Coast Regional Strategy (DPUD, 1994). Although its construction will have negative impacts on the reserves it should increase opportunity for management of the conservation estate.	No 2(d)
4. The bitumen road from Cervantes to Green Head should go ahead, but if it is linked through to Lancelin would spell the death of the area. (1)	See Comment 3 above. The road's alignment between Cervantes and Lancelin is yet to be determined.	No 2(d)
5. Should mention that the 26 km section between Jurien and Green Head has already commenced construction. (1)	Information included in plan.	Yes 1(e)
6. The construction of the coast road was identified in the Midlands Region Tourism Development Implementation Strategy 1991-1995, and will enable an eventual scenic drive to be marketed from Perth to Dongara. (1)	No change sought.	No 2(b)
7. Recommend that traffic be encouraged to pass through (the coast road) and only those travellers with a genuine interest in the scenery and environment be catered for. (1)	The road will encourage inter-regional traffic with an interest in the scenic and recreational characteristics of the region or the facilities of the coastal towns.	No 2(d)
8. Access to Lancelin would be maintained via spur access from the existing Perth-Lancelin Road from a point marginally south of Lancelin townsite, with the Perth-Lancelin Road continuing as the coastal road clear of the Lancelin sand dunes, with provision of shorter road service access between the Ocean Farms development and Lancelin. In view of recent subdivisional development (Seaview Estate) at the junction of the Perth-Lancelin and KW roads and possible further land use development adjacent to Lancelin, it is important that the corridor for the coastal road near Lancelin is protected from this development. (1)	Information noted.	No 2(c,d)
9. The existing road reserve that crosses the Defence Training Area links with Mimegarra Road and provides access to Cataby, Dandaragan and Moora, remains the future location for the coastal road. Prior to its construction the road reserve will need to be checked and cleared of unexploded ordnances. (1)	Information noted.	No 2(c,d)

Analysis of Public Submissions

<i>SUBMISSION COMMENTS (Number of Submissions)</i>	<i>DISCUSSION / ACTION TAKEN</i>	<i>PLAN AMENDED</i>
10. To maintain panoramic coastal views from the road north of the DTA, the alignment needs to be located along the proposed western option shown adjacent to the Crescent Dune on Map 11. (1)	Comment noted.	No 2(b,d)
11. The location of the coastal road through Nambung National Park will pass close to Grey, connect with the existing access to the Pinnacles and extend to Cervantes Road. Access to Cervantes will be maintained by existing Pinnacles Drive and Cervantes Road. (1)	Comment noted.	No 2(b,d)
12. The location of the road between Cervantes and Jurien will develop in accordance with existing Main Roads design plans for the road, including a high level bridge over the Hill River, but may need modification at Cervantes to link with Pinnacles Drive. This modification may involve approximately 6.5 kilometres of the existing surveyed alignment immediately north of the Cervantes Road, with a subsequent shift of the coastal road 2.0 kilometres closer to Cervantes townsite. (1)	Comment noted.	No 2(b,d)
13. A preliminary road alignment plan with associated land requirement details will be forwarded to CALM in March 1996 for comment. (1)	Information noted.	No 2(d)
14. Pending final agreement on the location of the coastal road between Lancelin and Cervantes the project would be referred to the Environmental Protection Authority to determine the level of environmental assessment that would need to be carried out along the route. (1)	Information noted.	No 2(d)
4WD Access		
15. All 4WD clubs, through their Association, should have some input to the decisions concerning the closure of unnecessary tracks. (3)	Covered in 19.5 Group and Club-based Activities.	No 2(d)
16. Some tracks, even duplicates, may have to remain open to ease the pressure on other tracks after the increase in access associated with the proposed bitumen road. (2)	All tracks will be considered when the access system is reviewed.	No 2(d)
17. (We) strongly agree that no unlicensed vehicles should be allowed access. (2)	Support for plan.	No 2(a)
18. 4WD access could be controlled by applying a maximum number of visitors per day, or permitting access only through a recognised camping or 4WD club. (1)	Recommendation 3 amended.	Yes 1(d)
19. Some type of pamphlet and sign program could be implemented to assist in education of drivers. (1)	Covered in 23.0 Information, Interpretation and Education.	No 2(d)
20. Tracks should not be upgraded too much to discourage 2WD vehicles which ultimately end up bogged or lost. (1)	Covered in Recommendation 1.	No 2(d)

<i>SUBMISSION COMMENTS (Number of Submissions)</i>	<i>DISCUSSION / ACTION TAKEN</i>	<i>PLAN AMENDED</i>
21. Rationalising existing tracks and halting the damage being caused by 4WDs should be given a high priority. (1)	Rationalising the access system has been given a high priority (see Table 5).	No 2(d)
22. Recommend that there be only minimum track closures and that a system of one-way tracks be adopted. (1)	The direction in which vehicles, particularly buses, are allowed to travel on tracks will be stipulated.	No 2(d)
23. The sand dune area east of Wedge should be designated as a 4WD area. (1)	Off-road vehicle use is not permitted in nature reserves. There is a designated off-road vehicle area at Lancelin.	No 2(d,f)
24. Allow 4WD access along the hinterland tracks to the east of Wedge. (1)	This access will be reviewed as part of rationalising the access system.	No 2(d)
25. Rec. 1: Supported. (1)	Support for plan.	No 2(a)
26. Rec. 2: Supported. (1)	Support for plan.	No 2(a)
27. Rec. 2: Opposed. (1)	Minimising the spread of dieback and the cause of erosion is a high priority.	No 2(f)
28. Rec. 3: Opposed. (2)	Visitor access may be restricted for such reasons as safety, dieback control or wildlife conservation.	No 2(f)
29. Rec. 4: Opposed. (2)	Roads will be maintained subject to management priorities and the availability of finances.	No 2(f)
30. Rec. 4: Support the complete sealing of the Pinnacles road. Sufficient funds must be made available to ensure this road is maintained. (1)	Roads will be maintained subject to management priorities and the availability of finances.	No 2(a)
31. Rec. 5: Opposed. Access to beaches should still be freely available to 4WD vehicles. (2)		No 2(e)
32. Rec. 5: Support restriction of 4WD access onto beach areas. (1)	Support for plan.	No 2(a)
33. Rec. 6: Supported. (1)	Support for plan.	No 2(a)
34. Rec. 6: Opposed. Speed limits are unenforceable. (1)	Speed limits are necessary in the interest of visitor safety.	No 2(d,f)
35. Rec. 6: Further classification is sought in regard to speed limit and size of vehicle. All vehicles using traditional tracks must have flag pole mounted on these vehicles. (1)	This will be done as part of implementation of this plan.	No 2(d)
36. Rec. 7: Supported. (1)	Support for plan.	No 2(a)
37. Rec. 8: Opposed. (2)	See Comment 3 this section.	No 2(d)
38. Rec. 9: Opposed to coastal road. (2)	See Comment 3 this section.	No 2(d)

SUBMISSION COMMENTS (Number of Submissions)	DISCUSSION / ACTION TAKEN	PLAN AMENDED
39. Maps 10 and 11: The proposed road from Wedge to Grey peters out about two thirds of the way up the coast. Access must be provided to Grey because of any required emergency egress from the area. (1)	Drafting error corrected.	Yes 1(e)
40. The maps require more detail especially where tracks and campsites are concerned. (1)	More detailed maps will be used in preparing site development and access plans.	No 2(d)
18.0 RECREATION AREAS		
8 submissions.		
1. (We) agree with the recommendations. (1)	Support for plan.	No 2(a)
2. The objective would be satisfied by the Grey Community Association's proposals (see 3.2 Surrounding Land). (1)	No change sought.	No 2(b)
Pinnacles Desert		
3. I strongly agree with the suggestion that a constructed lookout (over the pinnacles) should be established at one site. (1)	Support for plan.	No 2(a)
4. For the long-term preservation and appreciation of the pinnacles, information should be provided at a discrete point close to the pinnacles themselves. (1)	Support for plan.	No 2(a)
5. Additional infrastructure at the Pinnacles needs to be considered: <ul style="list-style-type: none"> • insufficient toilet facilities; • lack of car and coach parking facilities; • lack of directional and interpretive signage; • insufficient disabled access; • effect of vehicle exhaust pollution on pinnacles; • lack of a lookout facility with disabled access; • lack of shelter areas. (1) 	These points of concern will be addressed in the site development plan for the Pinnacles.	No 2(d)
Hangover Bay		
6. Hangover Bay is under utilised at present, already has a serviceable road and minor facilities. Why not develop it as well? (1)	The site will continue to be maintained.	No 2(d)
Grey and Wedge		
7. Recommend that Grey and Wedge areas, after the squatter shacks removal, be turned into bush style camping areas, accessible by 2WD, with minimal facilities, i.e. long drop toilets and barbecues only. Definitely no multi-faceted development. (1)	Outside the scope of this plan.	No 2(c)
8. The safari style accommodations (shacks) are a highlight to many of the thousands of overseas tourists to W.A. (1)	The State Government is committed to the removal of squatters' shacks through the implementation of its Squatter Policy.	No 2(c)
Sand Patch		
9. The Sand Patch should be recognised as a designated camp site as it is already cleared and used by some people as a place to camp. (1)	This site is suitable for day use only.	No 2(d)

SUBMISSION COMMENTS (Number of Submissions)	DISCUSSION / ACTION TAKEN	PLAN AMENDED
<p>Coastal Camping Area (4WD). See also 19.4 Camping.</p> <p>10. 4WD clubs should not be restricted to a small section of coast between Wedge and Grey for camping. (2)</p> <p>11. No mention is made on how many camping sites constitute 'a number' and no sites are marked on the map. An adequate number of sites must be provided to cater for the 4WD community. (2)</p> <p>12. Camping pods should be of varying sizes to cater for small or large groups (2 - 12 vehicles). (1)</p> <p>13. Camping pods should be well spaced out so that campers enjoy the isolation they are seeking. (1)</p>	<p>Camping is also proposed at Nilgen.</p> <p>More detailed maps will be used in preparing site development plans.</p> <p>Size of camping pods determined by environmental constraints. See also Comment 11 above.</p> <p>Design of camping pods determined in preparation of site development plans.</p>	<p>No 2(d)</p> <p>No 2(d)</p> <p>No 2(d)</p> <p>No 2(d)</p>
<p>19.0 RECREATION ACTIVITIES 1 submission.</p>		
<p>1. No mention is made of caving as a recreational activity. This policy is supported. (1)</p>	<p>Support for plan.</p>	<p>No 2(a)</p>
<p>19.1 Nature Appreciation No submissions.</p>		
<p>19.2 Bushwalking 3 submissions.</p>		
<p>1. (We) agree with the recommendations. (1)</p>	<p>Support for plan.</p>	<p>No 2(a)</p>
<p>2. Proposed walk tracks should provide the visitor with attractions and activities to view and experience. (1)</p>	<p>This is acknowledged.</p>	<p>No 2(d)</p>
<p>3. Interpretive signage (including flora information) would provide a value added experience for the visitor. (1)</p>	<p>This is acknowledged.</p>	<p>No 2(d)</p>
<p>4. Rec. 1: Any such network of walk tracks needs to consider the sensitivity of caves. (1)</p>	<p>This is acknowledged.</p>	<p>No 2(a,d)</p>
<p>19.3 Picnicking and Barbecuing 3 submissions.</p>		
<p>1. (We) agree with the recommendations. (1)</p>	<p>Support for plan.</p>	<p>No 2(a)</p>
<p>2. Rec. 2: Oppose ban on wood fires except for possible restrictions in summer months. Wood fires should be allowed in designated areas with campers bringing in their own wood. Special cement BBQ fire places should be provided in these areas. (2)</p>	<p>Wood fires are prohibited at all times.</p>	<p>No 2(d)</p>
<p>19.4 Camping 9 submissions.</p>		
<p>1. (We) agree with the recommendations. (1)</p>	<p>Support for plan.</p>	<p>No 2(a)</p>
<p>2. Some camping sites should be made large enough to accommodate 10-20 vehicles and their tents to allow for group camping by clubs. (5)</p>	<p>See Comments 12 and 13, Coastal Camping Area (4WD), previous section.</p>	<p>No 2(d)</p>

Analysis of Public Submissions

<i>SUBMISSION COMMENTS (Number of Submissions)</i>	<i>DISCUSSION / ACTION TAKEN</i>	<i>PLAN AMENDED</i>
3. The design of each vehicle bay should include the space for an annexe or a tent. (3)	See Comments 12 and 13, Coastal Camping Area (4WD), previous section.	No 2(d)
4. More camping areas in appropriate locations should be created particularly between Wedge and Grey. (3)	See Comments 12 and 13, Coastal Camping Area (4WD), previous section.	No 2(d)
5. Camping areas should accommodate groups of vehicles in a circular format or groups opposite each other with sufficient space in the centre for communal gathering. (1)	See Comments 12 and 13, Coastal Camping Area (4WD), previous section.	No 2(d)
6. The proposed camping sites between Wedge and Grey should be for 4WD only with pods catering for 2-12 vehicles. (1)	See Comments 12 and 13, Coastal Camping Area (4WD), previous section.	No 2(d)
7. Establish a bush camping site at Hill River between Cervantes and Jurien with around 8 pods. (1)	Outside scope of this plan.	No 2(c)
8. 2WD campers should be catered for at Grey and Wedge after the squatter shacks removal and the areas turned into bush style camping areas with minimal facilities, i.e. long drop toilets and barbecues only. (1)	Outside scope of this plan.	No 2(c)
9. (The Association) could become involved in any building of amenities such as fire pits or bush toilets if this was required. (1)	Comment noted.	No 2(b,d)
10. Disagree that potential exists at Grey and Wedge for camping. This stretch of coast is not suited to camping as is indicated by the nominal use for camping it currently receives. (1)	There is a large demand for camping along this stretch of coast.	No 2(d)
11. Question why any facilities have to be provided as this is seen by many as denigrating the meaning of camping. (1)	Facilities are required for health reasons.	No 2(d)
19.5 Group and Club-based Activities 4 submissions.		
1. (We) agree with the recommendations. (1)	Support for plan.	No 2(a)
2. (The Association) would welcome the opportunity to liaise with CALM concerning issues relating to the use of the area by 4WD clubs. (2)	This is acknowledged.	No 2(d)
3. Recommend that 4WD clubs be included in this section when considering the needs and activities of groups and clubs. (2)	Text amended.	Yes 1(b)
4. Recommend that public relations with the authorities be enhanced by the formation of mutual sub-committees which would include representatives from 4WD and fishing clubs. (1)	Covered in 24.0 Community Involvement.	No 2(d)
19.6 Recreational Fishing 2 submissions.		
1. (We) agree with the recommendations. (1)	Support for plan.	No 2(a)

SUBMISSION COMMENTS (Number of Submissions)	DISCUSSION / ACTION TAKEN	PLAN AMENDED
2. Suggest rewording last sentence, paragraph 1: 'Fishing is managed by the Fisheries Department under the Fish Resources Management Act 1994.' (1)	Text amended.	Yes 1(e)
19.7 Boating 2 submissions.		
1. (We) agree with the recommendations. (1)	Support for plan.	No 2(a)
2. Rec. 1: Support. (1)	Support for plan.	No 2(a)
3. Rec. 2: Oppose. Formal boat launching ramps are not needed. (1)	Comment noted.	No 2(d)
19.8 Horse-riding 1 submission.		
1. (We) agree with the recommendations. (1)	Support for plan.	No 2(a)
20.0 COMMERCIAL VISITOR SERVICES 6 submissions.		
1. (We) strongly recommend that no commercialisation of the area be undertaken. (3)		No 2(e)
2. (We) agree with the recommendations. (1)	Support for plan.	No 2(a)
3. Too much emphasis is being placed on tourism and the almighty dollar. Western Australians who enjoy 4WD-based recreation as their chosen form of recreation should not have it sacrificed to tourism. (1)	Comment noted.	No 2(d)
4. The impact of tour vehicles on the limestone structures and erosion in the surrounding area should be urgently assessed with the view to restricting access if damage is occurring. (1)	Refer to 17.0 Access.	No 2(d)
5. Rec. 1: Closer monitoring and enforcing is required to ensure all operators are licensed. (1)	Comment noted.	No 2(a,d)
6. Rec. 4: Opposed. CALM fix the track system? I'd like to see that! (1)		No 2(b)
7. Rec. 7: Support the establishment of a 'Minimum Standards of Operation' for operators. Criteria may include professionalism, conduct, knowledge, safety standards and equipment. (1)	Recommendation 7 amended.	Yes 1(e)
8. Consideration should be given to the introduction of an accreditation course for drivers/operators. (1)	Covered in Recommendation 7.	No 2(d)
9. Consideration should be given to the possibility of providing tour operators with access to areas which are able to sustain and cater for the coach/safari tour market. Attractions of interest may include caves, stromatolites, wetland areas and sites of Aboriginal significance. (1)	Refer to 17.0 Access.	No 2(d)

Analysis of Public Submissions

<i>SUBMISSION COMMENTS (Number of Submissions)</i>	<i>DISCUSSION / ACTION TAKEN</i>	<i>PLAN AMENDED</i>
10. Consideration should be given to the establishment of a Code of Conduct for tour operators. Principles to include vehicle flags, uniform speed limits, experienced drivers, safety equipment and medical equipment. (1)	Covered in Recommendation 7.	No 2(d)
11. Oppose more fees and licenses for tour operators. The tour and safari tour business is over competitive now. (1)	Outside scope of this plan.	No 2(c)
21.0 DOMESTIC ANIMALS		
<i>5 submissions.</i>		
1. (We) agree with the recommendations. (1)	Support for plan.	No 2(a)
2. Domestic animals should be banned from all areas of the Park and Reserves and from all camping areas. Rec. 1 should simply read 'Prohibit domestic animals in the Park and Reserves.' (1)		No 2(d)
3. Wild cats, although few in number, are currently trapped and destroyed by residents of Grey. The survival of domestic dogs left to their own defences would be short and limited to winter months. (1)	Comment noted.	No 2(b)
4. Rec. 1: Reword as ' Prohibit domestic animals, including horses and dogs, in the Park and Reserves except in designated zones along the coast of Nilgen Nature Reserve, Nambung-Wanagarren National Parks and Southern Beekeepers Reserve. Constantly monitor the impact of dogs with a view to prohibit them subject to a review after five years. (1)		No 2(d)
5. What harm does my little dog do? (1)	No change sought.	No 2(b)
22.0 VISITOR SAFETY		
<i>2 submissions.</i>		
1. (We) agree with the recommendations. (1)	Support for plan.	No 2(a)
2. Access to 4WD users should not be restricted. (1)	Visitor access may be restricted for such reasons as safety, dieback control or wildlife conservation.	No 2(d)
3. Some of the pinnacles appear to be flawed and could come down on the climber. (1)	This is acknowledged. Climbing pinnacles is prohibited.	No 2(d)
23.0 INFORMATION, INTERPRETATION AND EDUCATION		
<i>3 submissions.</i>		
1. Starting in February 1996, the WA Association of 4WD Clubs will be conducting Driver Training Programs based on a National curriculum. The course has protection of the environment as a major priority. (1)	No change sought.	No 2(b)

SUBMISSION COMMENTS (<i>Number of Submissions</i>)	DISCUSSION / ACTION TAKEN	PLAN AMENDED
2. Consideration should be given to establishing an interpretive facility making use of audio-visual and hands-on activities to enhance visitors' experiences. (1)	Comment noted.	No 2(d)
3. Greater emphasis should be placed upon education in the use of environmentally sensitive areas by use of advertising in the media, brochures and strategic placement of signs and warnings in the appropriate areas. (1)	Comment noted.	No 2(d)
24.0 COMMUNITY INVOLVEMENT <i>2 submissions.</i>		
1. Under Government Agency Liaison, there is no mention of liaising with the W.A. Museum. (1)	Text amended.	Yes 1(e)
2. Since 1968 the WIPA has never been contacted by any Government Authority for any reason whatsoever. CALM has never shown any interest in what happened at Wedge Island. (1)	Comment noted.	No 2(b)
25.0 COMMERCIAL FISHING <i>4 submissions.</i>		
1. Amend last sentence, first paragraph: 'There are up to two vessels at Grey and seven vessels at Wedge.' (1)	Text amended.	Yes 1(e)
2. Include under 'Aquaculture': All aquaculture proposals are subject to review by the Inter Departmental Committee on Aquaculture (IDCA). This committee, comprising nine government agencies, considers applications for new ventures and seeks advice from the local shire, water authorities and affected industry and recreational groups, before making a recommendation to the Executive Director of Fisheries.' (1)	Information included in plan.	Yes 1(a,e)
3. Rec. 4 suggesting a review of aquaculture proposals is unnecessary and should be deleted.(1)	Recommendation reworded.	Yes 1(d)
4. Deckies - temporary hands hired by commercial fishermen - represent some of the most transient and careless users of the area. It should not be implied or assumed that the fishermen and/or their workers care for the environment more than the occupiers of shacks (ALDs). (2)	The State Government is committed to the removal of squatters' shacks through the implementation of its Squatter Policy.	No 2(b)
26.0 MINING, MINERAL AND PETROLEUM EXPLORATION <i>3 submissions.</i>		
1. No exploration and mining is to be allowed in any of the reserves covered by this DMP. (1)	Subject to Government policy.	No 2(f)

Analysis of Public Submissions

SUBMISSION COMMENTS <i>(Number of Submissions)</i>	DISCUSSION / ACTION TAKEN	PLAN AMENDED
2. Reference should be made to the uses of the resources described in the draft plan. Within each of the conservation reserves there are large deposits of limesand and limestone of moderate to high quality grade which are suitable for cement and lime manufacture. The area is also prospective for heavy mineral sands. Demand for these resources is likely to increase significantly in the near future. (1)	Information included in plan.	Yes 1(a,e)
3. The concerns of the DME have been adequately addressed. (1)	No change sought.	No 2(b)
4. Any exploration or mining in the areas of the caves would be devastating and inimical to the cave invertebrates. (1)	This is acknowledged. Exploration and mining is subject to Government policy.	No 2(d,f)
26.1 Basic Raw Material Extraction		
<i>1 submission.</i>		
1. The concerns of the DME have been adequately addressed. (1)	No change sought.	No 2(b)
27.0 UTILITIES AND SERVICES		
<i>No submissions.</i>		
28.0 APICULTURE		
<i>No submissions.</i>		
29.0 RESEARCH AND MONITORING		
<i>1 submission.</i>		
1. It is essential that further research be done on the underground fauna of the Park and that management procedures be drafted with more recognition of the importance of this invertebrate fauna. (1)	This research is recommended in 8.0 Fauna.	No 2(d)
30.0 MANAGEMENT STRUCTURE AND STAFF RESOURCES		
<i>1 submission.</i>		
1. Rec. 4: Recreational off-road vehicle clubs could support volunteer programs in conjunction with the management authority. (1)	This is acknowledged.	No 2(b,d)
2. The resources of the clubs and expertise of some members could be used in the rehabilitation of degraded areas, construction of facilities and ongoing maintenance of facilities and tracks. (1)	This is acknowledged.	No 2(b,d)
31.0 PRIORITIES AND REVIEW		
<i>2 submissions.</i>		
1. Recommend that the management plan provide a provisional costing and time frame for all recommendations for the final version of the plan. (2)	Implementation programs are prepared and reviewed annually by the District. Priorities are also reviewed annually or as circumstances change.	No 2(d)
2. Calculated statements on funding would give CALM's recommendations about the future of the Park credibility. (1)	See Comment 1 above.	No 2(d)

SUBMISSION COMMENTS (<i>Number of Submissions</i>)	DISCUSSION / ACTION TAKEN	PLAN AMENDED
<p>APPENDICES</p> <p>Appendix 1. State Government Squatter Policy</p> <p><i>1 submission.</i></p> <p>1. Delete this version of Appendix 1 and substitute the one attached. This is the actual document that was presented to and endorsed by State Cabinet in 1988. (1)</p> <p>Appendix 2. Landscape Character Types</p> <p><i>1 submission.</i></p> <p>1. The whole region consists of karst but this is not apparent in Appendix 2 where landforms are defined by topography alone without the consideration of geologic character and soils which one would expect in any land unit classification for management purposes. (1)</p>	<p>Appendix substituted.</p> <p>The geology and soils form part of the description of landforms within a landscape character type.</p>	<p>Yes <i>1(c)</i></p> <p>No <i>2(d)</i></p>

APPENDIX 1. LIST OF SUBMITTORS

Community - individuals

E. G. Emery
R. Foulds
M. L. Isbister
R. J. & Y. G. Walton

Community - organisations

Australian Speleological Federation
Cervantes Chamber of Commerce
Conservation Council of W.A.
Grey Community Association
Mitchell, Goff & Associates
Rethink Consulting Pty Ltd
Wedge Island Progress Association

Recreation Groups

Armadale 4WD Club
Eastern Suburbs 4WD Club
Jeep Owner's Club of W.A.
Landrover Owner's Club of W.A.
North Side 4WD Club
South Side 4WD Group
Toyota Landcruiser Club
W.A. Association of 4WD Clubs

Government Agencies

Agriculture Protection Board of W.A.
Department of Conservation and Land Management
Department of Minerals and Energy
Fisheries Department
Main Roads W.A.
Water and Rivers Commission of W.A.
W.A. Museum
W.A. Tourism Commission

SUBMITTORS

1. K. McNamara W.A. Museum
2. N. Williams Cervantes Chamber of Commerce
3. Environment Officer North Side 4WD Club
4. Environment Officer Jeep Owner's Club of W.A.
5. M. L. Isbister
6. Environment Officer Toyota Landcruiser Club
7. Environment Officer Armadale 4WD Club
8. S. L. Meyerkort CALM Shack Management Program
9. S. Kinninment W.A. Association of 4WD Clubs
10. R. Powell CALM
11. R. Siewert Conservation Council of W.A.
12. P. M. Goff Mitchell, Goff & Associates
13. Executive Director Fisheries Department
14. Director W.A. Tourism Commission
15. Secretary Landrover Owner's Club of W.A.
16. Secretary Wedge Island Progress Association
17. Secretary Grey Community Association
18. Director General Dept of Minerals and Energy
19. E.G. Emery
20. R. Foulds
21. Environment Officer Eastern Suburbs 4WD Club
22. R. J. & Y. G. Walton
23. E. Pearson Agriculture Protection Board of W.A.
24. Manager Main Roads of W.A.
25. D. Smythe South Side 4WD Group
26. R. Webb Australian Speleological Federation
27. E. Hamilton-Smith Rethink Consulting Pty Ltd
28. P. Williams Water and Rivers Commission of W.A.