

ANALYSIS OF PUBLIC SUBMISSIONS
to the Draft Management Plan
for
Esperance Lakes Nature Reserves

A32257 Lake Warden

A15231 Woody Lake

A23825 Mullet Lake

A31197 Shark Lake

C24511 Pink Lake

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
Acknowledgements ...	1
INTRODUCTION	
1.0 Overview ...	1
1.1 Brief Description ...	2
1.2 Ramsar Listing ...	2
1.3 Public Participation ...	2
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
2.4 Key Issues for Future Management ...	2
LAND USE MANAGEMENT	
3.0 Land Tenure ...	2
4.0 Management Zones...	3
MANAGEMENT FOR CONSERVATION	
5.0 Principal Conservation Directions ...	4
6.0 Management for Conservation of Resources ...	4
6.1 Ramsar Obligations ...	4
6.2 Geology, Landforms and Soils ...	4
6.3 Catchments and Hydrology ...	4
6.4 Vegetation and Flora ...	7
6.5 Fauna ...	7
6.6 Cultural Heritage ...	8
6.7 Landscape Management ...	8
6.8 Plant Diseases ...	8
6.9 Fire Management ...	8
6.10 Introduced Plants and Animals...	8
6.11 Rehabilitation ...	9
RECREATION AND TOURISM	
7.0 Principal Recreation Directions ...	9

	Page
8.0 Recreation Activities	9
8.1 Nature Appreciation	9
8.2 Bushwalking	9
8.3 Picnicking and Barbecuing	9
8.4 Water-based Recreation	9
8.5 Horse-riding	11
8.6 Off-Road Vehicles	11
9.0 Commercial Visitor Services... ..	11
10.0 Visitor Safety	12
11.0 Domestic Animals	12
COMMERCIAL AND OTHER USES	
12.0 Management of Commercial and Other Uses	12
12.1 Mining and Mineral Exploration	12
12.2 Basic Raw Material Extraction... ..	12
12.3 Utilities and Services	12
12.4 Aquaculture	13
12.5 Other Commercial Uses	13
COMMUNITY RELATIONS	
13.0 Information, Interpretation and Education	13
14.0 Interaction with the Community and other Authorities... ..	13
RESEARCH AND MONITORING	
15.0 Research and Monitoring	13
IMPLEMENTATION	
16.0 Resources	13
17.0 Priorities	14
18.0 Evaluation and Review	14
REFERENCES	14
APPENDIX 1.	
Submitters to the Draft Management Plan	15

INTRODUCTION

This document is an analysis of public submissions to the draft management plan for the Esperance Lakes Nature Reserves (1997).

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;
- advertising in local and Statewide newspapers;
- conducting a community survey of visitors and Esperance residents; and
- conducting a public workshop.

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

The Esperance Lakes Nature Reserves draft management plan was released for public comment on 12 May 1998, by the Minister for the Environment, the Hon. Cheryl Edwardes MLA, at a public meeting held in Esperance. 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 17 July 1998. Individual requests for an extension of the submission period were granted and late submissions were accepted. A total of 16 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 Esperance Lakes 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
Individuals	2	12.5
Recreation Groups	2	12.5
Conservation Groups	3	18.8
Government Agencies	<u>9</u>	<u>56.2</u>
	16	100.0

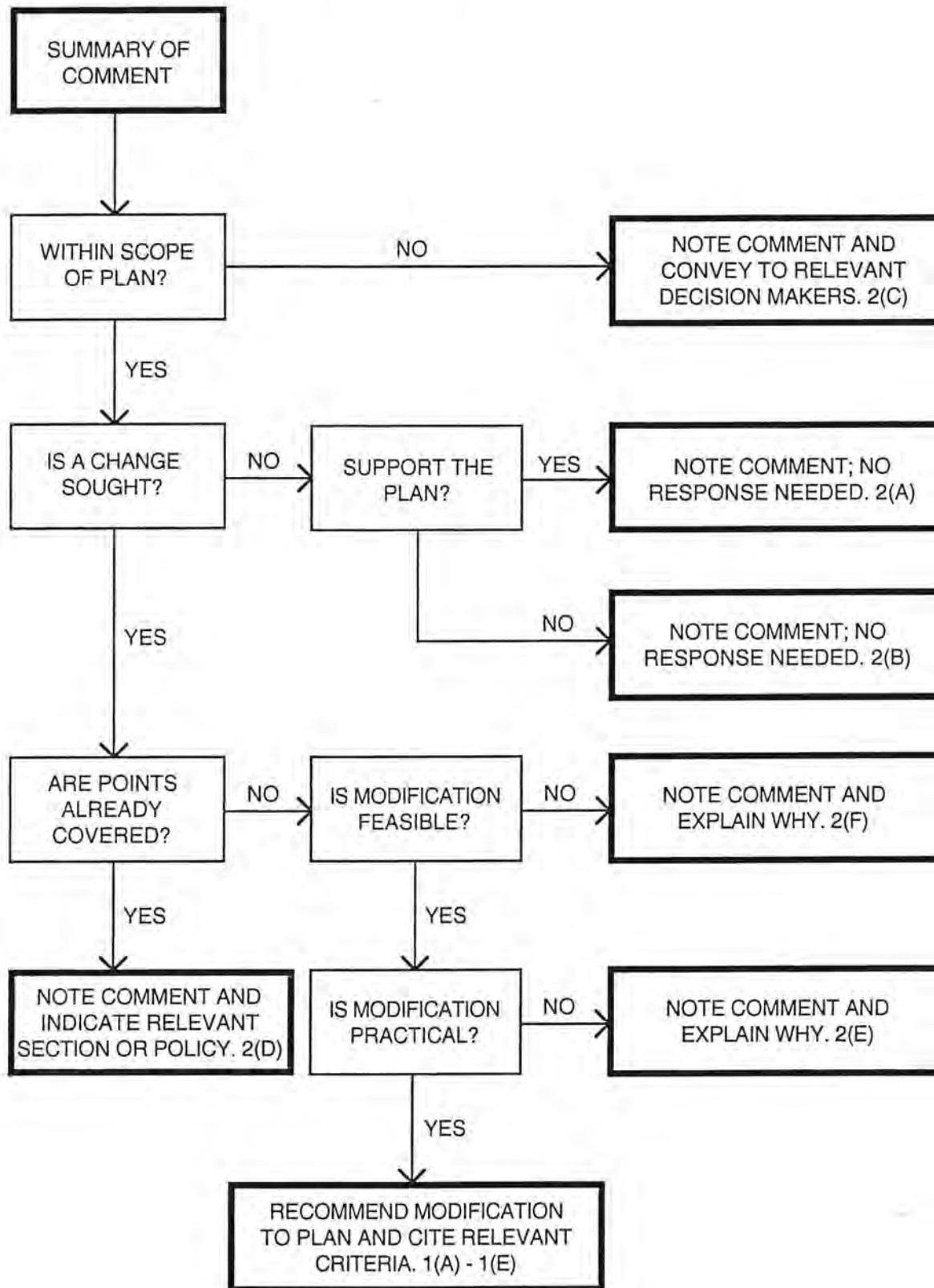
A list of the submitters to the Esperance Lakes Nature Reserves draft management plan is given in Appendix 1.

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 <i>6 submissions.</i></p> <ol style="list-style-type: none"> 1. The DMP is quite extensive. All aspects appear to have been addressed and extensive research is evident. (1) 2. The plan recognises most threats to the reserves both internal and external. (1) 3. Management actions within the reserves are supported. (1) 4. This DMP is not a representation of the broad section of the community and is totally out of touch with the real feelings of Esperance residents. (1) 5. Overall, the DMP is of a very high standard and discusses the management and conservation issues for the Esperance Lakes and surrounding areas in a clear and comprehensive manner. (1) 6. The Ramsar boundary should be indicated on other maps besides Map 1. (1) 7. Overall the Management Plan is excellent for the areas that are covered by it. (1) 8. (We) acknowledge the CALM team for the quality and integrity of the draft management plan. (1) <p>Acknowledgments <i>1 submission.</i></p> <ol style="list-style-type: none"> 1. Amend to read: 'Financial assistance ... provided by the National Wetlands Program administered by the Biodiversity Group of Environment Australia.' (1) 	<p>Maps amended.</p> <p>Text amended.</p>	<p>No 2(b)</p> <p>No 2(b)</p> <p>No 2(a)</p> <p>No 2(e)</p> <p>No 2(b)</p> <p>Yes 1(e)</p> <p>No 2(b)</p> <p>No 2(b)</p> <p>Yes 1(e)</p>
<p>INTRODUCTION 1.0 OVERVIEW <i>2 submissions.</i></p> <ol style="list-style-type: none"> 1. A new section 1.3 is suggested to elaborate on the catchment issues, in particular, the listing of Lake Warden as a 'Recovery Catchment' under the State Salinity Action Plan, and that a Recovery Catchment plan is being prepared (during 1998/99). (2) 2. The plan should mention that the Esperance Lakes system and associated vegetation provides a corridor linkage around Esperance town to join unbroken reserves to the east and to the west as part of the South Coast 'macro-corridor' of vegetation. This linkage is therefore important as a potential migratory and gene pool pathway. (1) 	<p>New section added giving overview on the Recovery Catchment plan.</p> <p>Text added.</p>	<p>Yes 1(a,e)</p> <p>Yes 1(a,e)</p>

SUBMISSION COMMENTS (Number of Submissions)	DISCUSSION / ACTION TAKEN	PLAN AMENDED
1.1 Brief Description 2 submissions. 1. Reference to the lakes being predominantly fed by 'drainage channels from the agricultural districts' could be mistaken by some to refer to engineered drains rather than natural creeks. (2)	Text amended.	Yes 1(e)
1.2 Ramsar Listing No submissions.	Text has been added to clarify that nomination of Ramsar areas is independent of any existing management plan.	Yes 1(e)
1.3 Public Participation No submissions.		
2.0 MANAGEMENT GOALS AND OBJECTIVES 2.1 Primary Objectives No submissions.		
2.2 NPNCA and CALM Policies 1 submission. 1. It is assumed the final management plan will, to the greatest extent possible, make reference to the new 'Wetlands Conservation Policy of Western Australia'. (1)	Information has been included.	Yes 1(a,e)
2.3 Management Goals 1 submission. 1. Expand the Community Relations goal to: 'Promote informed appreciation of, and community support for, the Reserves and their topographic catchments, natural and cultural values, and facilitate liaison with the community and government agencies about their management.' (1)	Wording of the goal has been amended.	Yes 1(d)
2.4 Key Issues for Future Management 1 submission. 1. The incremental advance of subdivision and farmlets on adjacent land is also a key issue. (1)	Text added to key issues.	Yes 1(e)
LAND USE MANAGEMENT 3.0 LAND TENURE 7 submissions. 1. Support tenure proposals in Table 1. (2)	Support for plan.	No 2(a) Yes 1(d,e)
2. A new specific section 'Development of Adjoining Lands' is warranted by rearranging various recommendations throughout the report (namely s.6.3 rec. 4, s.6.7 rec. 4, s.6.7 rec. 5, s.6.9 rec. 19 and s.3.0 rec. 3) (1)	A new section 4 - Development of Adjoining Lands, has been added under 'Land Use Management'.	
3. Council has adopted a Limited Rural Strategy for land north of the lakes system. This provides for potential subdivisions to be assessed against certain land capability criteria. (2)	Information has been included and a Strategy added to new section 4.	Yes 1(d,e)
4. The unvested part of Pink Lake that is not under salt lease should be vested in the NPNCA and included in this management plan. (2)	Table 1 amended to include unvested part of Pink Lake that is not under salt lease.	Yes 1(d)

<i>SUBMISSION COMMENTS (Number of Submissions)</i>	<i>DISCUSSION / ACTION TAKEN</i>	<i>PLAN AMENDED</i>
5. Consider acquiring Shire reserve 4181 to include as part of Lake Warden. (2)	Table 1 amended to include reserve 4181.	Yes 1(d)
6. The plan should make reference to, or recommend, the possible purchase (from willing sellers) of any adjacent private land that will add significantly to the integrity of the reserves and/or their role in consolidating the vegetation 'macro-corridor'. (2)	New strategy added.	Yes 1(d)
7. Should the plan acknowledge the development of the Myrup Fly-In Estate adjacent to Mullet Lake Nature Reserve? (1)	Information added to new section 4.	Yes 1(e)
8. Oppose the removal of recreation from the purpose of A32257 Lake Warden Nature Reserve. (1)		No 2(e)
9. Oppose the addition of Lots 1 and 3 or C33660 to Lake Warden Nature Reserve if future requirements of recreational fishers would be removed. (1)	See comments in 8.4 Water-based Recreation.	No 2(f)
10. Encourage the Shire to adopt a Local Greening Plan, as part of the Esperance Town Planning Scheme, to act as a tool in adopting the DMP and other relevant management plans. (1)	Considered to be outside the scope of this plan.	No 2(c)
11. Additions to Woody Lake and Lake Warden Nature Reserves should be a priority. (1)	Covered in 17. Priorities.	No 2(d)
4.0 MANAGEMENT ZONES <i>3 submissions.</i>		
1. The special conservation zone in Lake Warden should be extended on the northern side of the lake to include at least 200m of the shoreline to as far as Shire reserve C33660. Hooded Plover also uses this part of the lake. (2)	Zoning map amended.	Yes 1(d)
2. Support foot access only to special conservation zones. (1)	Support for plan.	No 2(a)
3. Special conservation zones need good or improved barriers to prevent vehicles, horses, dogs, motorbikes and the like from entering. (1)	Access barriers will be erected as part of the implementation of other strategies in the plan.	No 2(d)
4. Special conservation zones require signs indicating their Ramsar importance and bird species of importance. (1)	Covered in 13. Information, Interpretation and Education.	No 2(d)
5. A 200m special conservation zone should be placed at Lake Wheatfield where the channel exits towards Woody Lake. Many waterfowl use this area to roost and feed. (1)	Text added to clarify level of access in the recreation zone.	Yes 1(e)
6. It would be good to see the area that includes Station, Mullet and Ewans Lakes zoned as special conservation or low impact area (i.e. 'retreat') for waterbirds. (1)	Covered by zoning plan.	No 2(d)

SUBMISSION COMMENTS (Number of Submissions)	DISCUSSION / ACTION TAKEN	PLAN AMENDED
<p>MANAGEMENT FOR CONSERVATION</p> <p>5.0 PRINCIPAL CONSERVATION DIRECTIONS</p> <p><i>No submissions.</i></p> <p>6.0 MANAGEMENT FOR CONSERVATION OF RESOURCES</p> <p>6.1 Ramsar Obligations</p> <p><i>1 submission.</i></p> <p>1. Amend Rec. 1. to read: '... in accordance with the wise use guidelines ...' (1)</p> <p>6.2 Geology, Landforms and Soils</p> <p><i>No submissions.</i></p> <p>6.3 Catchments and Hydrology</p> <p><i>9 submissions.</i></p> <p>1. If possible, prevent any more subdivisions of rural land around the lake system. (1)</p> <p>2. The Bandy Creek weir should be removed all together or have sluice gates installed to allow fish to move upstream. (1)</p> <p>3. Rec. 5 should include '... and weir and its effects on fish stocks and food supply for birds in the Mullet Lake complex.' (3)</p> <p>4. The level of fertiliser use on adjacent farms within a kilometre of the reserves should be set. (1)</p> <p>5. Update this section to include the Salinity Action Plan / Recovery Catchment initiatives, including the preparation of a Recovery Catchment Plan. (3)</p> <p>6. The plan should note that W&RC have installed automatic water quality and flow recording stations outside the reserves and is currently collecting data on the quantity and quality of water flowing into the Lake Warden system. (2)</p> <p>7. Four permanent transects and a number of water monitoring bores have been established at Wheatfield Lake as part of the Salinity Action Plan wetland vegetation monitoring program. (1)</p> <p>8. The huge commitment to landcare in the Esperance District can be clearly demonstrated by the success in obtaining funding. (1)</p> <p>9. The Bandy Creek barrage is having a direct impact on the fish fauna of the region and CALM may not be upholding its obligations under the Ramsar convention relating to the maintenance of natural fish fauna. (1)</p>	<p>Recommendation amended.</p> <p>Covered in new section 4 - Development of Adjoining Lands.</p> <p>The impacts of the weir will be investigated. Recommendation 5 amended.</p> <p>Recommendation 5 amended.</p> <p>Considered outside the scope of this plan. Liaison with the Shire of Esperance concerning adjacent lands will continue.</p> <p>Information added.</p> <p>Information added.</p> <p>Information added.</p> <p>No change sought.</p> <p>See comments 2 and 3 above.</p>	<p>Yes <i>1(e)</i></p> <p>No <i>2(d)</i></p> <p>Yes <i>1(e)</i></p> <p>Yes <i>1(e)</i></p> <p>No <i>2(c)</i></p> <p>Yes <i>1(c)</i></p> <p>Yes <i>1(e)</i></p> <p>Yes <i>1(c)</i></p> <p>No <i>2(b)</i></p> <p>Yes <i>1(e)</i></p>

<i>SUBMISSION COMMENTS (Number of Submissions)</i>	<i>DISCUSSION / ACTION TAKEN</i>	<i>PLAN AMENDED</i>
10. Management and integration of data on Lake Warden and the catchment is needed to enable community access for planning, monitoring etc. (1)	New strategy added to 15. Research and Monitoring.	Yes 1(d)
11. Rec. 2: A catchment management plan has been progressing slowly with landowners for several years. There is room for CALM to be involved rather than simply 'foster implementation' as stated. (1)	Recommendation 2 amended.	Yes 1(d)
12. Rec. 3: The term 'maintain support' implies present support is adequate, but far greater support is needed in developing more sustainable land management systems. (1)	Recommendation 3 amended.	Yes 1(d)
13. Rec. 4: To 'liaise with the Shire and Ministry for Planning' needs to be supported with action if a threatening impact is identified. CALM could take a stronger stance in averting future bad planning decisions. (1)		No 2(c)
14. Reference to the lakes being predominantly fed by 'drainage channels from the agricultural districts' could be mistaken by some to refer to engineered drains rather than natural creeks. Change to '... by natural drainage from'. (2)	Text amended.	Yes 1(e)
15. Extend Map 3 to show the full extent of contributing areas upslope of the reserves showing cleared areas, creek systems etc. (2)	A new map has been included.	Yes 1(e)
16. Provide clearer information on the hydrology of the lakes in relation to surrounding groundwaters and surface flows, e.g. salinity trends over time. (1)	Information will be collected and used to assist in management.	No 2(c)
17. If details on salinity trends are not available then need to mention urgency in acquiring it. (1)	Information will be collected and used to assist in management.	No 2(c)
18. Need to clarify whether monitoring has continued since 1993. (1)	Monitoring is ongoing. Data will be updated.	Yes 1(e)
19. Results from a Ribbons of Blue Project in one lake are not reported. They could shed some light on salinity trends. (1)	Data will be included in Table 2 if available.	Yes 1(e)
20. Rec. 9 only investigates the impact of groundwater supplies and use on the lakes, not on groundwater rises because of past clearing. (1)	Covered in Rec. 9.	No 2(d)
21. There is apparent inconsistency between the statement on p. 8 that groundwater levels are rising by 10 cm per annum and Table 3 which states that the rate of rise is unknown. (1)	Inconsistency amended.	Yes 1(e)
22. Can Map 3 show the location of any monitoring bores? (1)	Locations of monitoring bores outside the reserves may change during the life of the plan.	No 2(c)

SUBMISSION COMMENTS (Number of Submissions)	DISCUSSION / ACTION TAKEN	PLAN AMENDED
23. Clarify the statement (p. 8) that the hydrology of the lakes is affected by marine groundwater. This infers saltwater intrusion and/or tidal influences extend 2 to 3 km inland to affect the lakes. (1)	This will be investigated.	No 2(b)
24. High salinity in the lakes is at least partly due to very poor flushing which results in concentration due to evaporation. (1)	Information added.	Yes 1(e)
25. Expand the section to indicate that drainage proposals on agricultural land are assessed by the Soil Commissioner, and that the Commission and AgWA also 'support and encourage the adoption of agricultural methods which increase the <i>in situ</i> use of water.' (1)	Information added.	Yes 1(c)
26. The plan should outline the landcare projects that are currently operating within the catchments. (1)	A recovery catchment plan will shortly be prepared for the Esperance lakes' catchments. This will cover the landcare projects currently operating.	No 2(c)
27. The plan should mention that the lakes to the west of Fisheries Rd are within the Esperance Ground Water Area, declared under the <i>Rights in Water Irrigation Act 1914</i> , for the purpose of abstraction and licensing; and the Esperance Water Reserve, under the <i>Country Areas Water Supply Act 1947</i> , for the purpose of protection of groundwater quality. (1)	Information added.	Yes 1(c)
28. A Groundwater Allocation Plan will be developed in 1999, and a management protection plan is currently being prepared for the 'Priority Areas' in the Esperance Water Reserve. (1)	Information added.	Yes 1(c)
29. The groundwater section could be expanded to include the groundwater flow directions near the lakes, the nature of groundwater and lake water interactions, and potential impacts of groundwater abstraction on lake water levels and water quality. (1)	Covered in Rec. 9 and acknowledged in text.	No 2(d)
30. The salinity scale in Table 2 does not conform to Australian standards (which are supplied in the submission). (1)	Australian standards focus on drinking water which is not necessarily appropriate in regard to biological data.	No 2(d)
31. Monitoring of water flows into the lakes has already commenced and CALM should endeavour to ensure all requirements are covered by a monitoring plan. Replace 'commence' with 'continue' in last paragraph. (2)	Text amended.	Yes 1(e)
32. Change text p. 8 to '... land and water degradation due to changes in the catchment water balance.' (1)	Text amended.	Yes 1(e)

<i>SUBMISSION COMMENTS (Number of Submissions)</i>	<i>DISCUSSION / ACTION TAKEN</i>	<i>PLAN AMENDED</i>
33. Edit last sentence paragraph 3 to 'Community catchment groups should be encouraged to monitor and protect wetlands, remnant vegetation and waterways in their catchments.' Move reference up to end of '... integral to the strategy.' (1)	Text amended.	Yes 1(e)
34. Add to end of paragraph starting 'In 1994 ...' with 'The current monitoring system (including Ribbons of Blue program) could be integrated with other agencies and community monitoring systems and expanded to include the agricultural catchments (see Recommendation 8).' (1)	Text added.	Yes 1(e)
35. Replace first two sentences (last paragraph, p. 8) with 'There is evidence that the saline groundwater table is rising in the surrounding catchments at rates of between 10-30 cm per annum (Short <i>et al.</i> , 1995).' (1)	Text amended.	Yes 1(e)
36. Future Outlook, p. 11: replace first sentence with 'There are a number of landcare groups ... based on the topographic catchments listed on p. 8.' (1)	Text amended.	Yes 1(b)
37. Rec. 3: delete 'the five'. (1)	Text amended.	Yes 1(b)
38. Rec. 8: Expand to 'Support community monitoring programs, such as ... and ...' (1)	The existing strategy indicates other monitoring programs will be supported.	No 2(d)
6.4 Vegetation and Flora <i>1 submission.</i>		
1. Amend Rec. 6 to: '... declared rare and priority listed species of flora.' (1)	Recommendation amended.	Yes 1(d)
2. Suggest changing section heading to 'Local Native Vegetation and Flora' for clarification between s.6.10. (1)	Headings are clear enough.	No 2(d)
3. Add to end of Rec. 3 '... and environmental weeds that pose a current and long term threat to the ecology and natural processes of the reserves.' (1)	Covered in 6.10 Introduced Plants and Animals.	No 2(d)
6.5 Fauna <i>3 submissions.</i>		
1. Support Rec. 1. (1)		No 2(a)
2. Rec. 3 should include '... priority and introduced fauna.' (2)	Surveys will not be restricted to threatened fauna only. Introduced fauna is covered in 6.10 Introduced Plants and Animals.	No 2(d)
3. Rec. 4 should include '... and reduce feral animals.' (1)	'Control' includes the notion of reduction or eradication.	No 2(d)
4. Suggest changing section heading to 'Local Native Fauna' for clarification between s.6.10. (1)	Headings are clear enough.	No 2(d)

<i>SUBMISSION COMMENTS (Number of Submissions)</i>	<i>DISCUSSION / ACTION TAKEN</i>	<i>PLAN AMENDED</i>
5. Strengthen this section by the addition of species lists, particularly JAMBA/CAMBA species, as an Appendix. (1)	Species lists have not been included in the final plan.	No 2(d)
6.6 Cultural Heritage 1 submission.		
1. Recommendations 5 and 6 do not include liaison with the Heritage Council of Western Australia. (1)	Recommendations amended.	Yes 1(d,e)
6.7 Landscape Management No submissions.	Relevant strategies from this section have been moved to new section 4. Development of Adjoining Lands.	Yes 1(d)
6.8 Plant Diseases No submissions.		
6.9 Fire Management 3 submissions.		
1. Improve that portion of Lake Road that is currently a rough track to 4WD vehicles, access for fire management purposes only (as per Rec. 9). (1)	The section of this road has been improved in accordance with Recommendation 9.	No 2(d)
2. The legend in Map 6 should read: No 'planned' burn areas. (1)	Map amended.	Yes 1(e)
3. Add a Habitat Management Area on the north side of Lake Warden (Map 6). The existing vegetation is collapsing due to senescence. (1)	Map amended.	Yes 1(d)
4. Amend Rec. 7: '... from Wheatfield Lake, Woody Lake and Shark Lake for fire-fighting purposes.' (1)	Recommendation amended.	Yes 1(d,e)
6.10 Introduced Plants and Animals 3 submissions.		
1. Pampas grass (<i>Cortaderia selloana</i>) and African lovegrass (<i>Eragrostis curvula</i>) is also present in Shark Lake Nature Reserve. (1)	Information added.	Yes 1(a)
2. CALM needs to liaise with Main Roads WA in regard to implementing a weed eradication program along the Coolgardie-Esperance Highway where it dissects the reserves. (2)	New strategy added.	Yes 1(d)
3. Weed invasion will need major resources, i.e. dollars, labour and volunteers, plus ongoing management. (1)	Covered in 16. Resources.	No 2(d)
4. Road verges also provide an opportunity for low level publicity using tasteful signage to the motoring public. (1)	This will be considered when implementing strategies in 13. Information, Interpretation and Education.	No 2(d)
5. There is no mention of management of intruding domestic cats and dogs. Cats should be trapped and euthanased, and dogs impounded for first-time offenders. (1)	Text amended.	Yes 1(e)
6. Recommend that the Shire of Esperance be involved in programs to control declared weeds and pests as per Rec. 4. (1)	Recommendation amended.	Yes 1(d,e)

SUBMISSION COMMENTS (Number of Submissions)	DISCUSSION / ACTION TAKEN	PLAN AMENDED
6.11 Rehabilitation <i>No submissions.</i>		
7.0 PRINCIPAL RECREATION DIRECTIONS <i>1 submission.</i>		
1. Update references to water-skiing (club now defunct). (1)	The section on water-skiing has been revised.	Yes 1(b)
8.0 RECREATION ACTIVITIES		
8.1 Nature Appreciation <i>2 submissions.</i>		
1. Support all recommendations. (1)	Support for plan.	No 2(a)
2. Appropriate recreation areas for information include Lake Warden and the carparks at Wheatfield Lake, Woody Lake and Windabout Lake. (1)	This will be considered when implementing strategies in 13. Information, Interpretation and Education.	No 2(d)
3. Support a new small carpark at or near the strategic firebreak at the south-eastern end of Wheatfield Lake coming off Fisheries Road. (1)	Comment noted.	No 2(d)
4. Amend Map 7 to include additional bird hide (on edge of Wheatfield Lake) and proposed lookout near Woody Lake. (1)	Map amended.	Yes 1(e)
8.2 Bushwalking <i>No submissions.</i>		
8.3 Picnicking and Barbecuing <i>1 submission.</i>		
1. The carpark at the former ski launch site is now defunct for that purpose. It may be better to close it and rehabilitate with a properly planned and safer (no through traffic) alternative provided elsewhere. (1)	The section on water-skiing has been revised.	Yes 1(b)
8.4 Water-based Recreation <i>8 submissions.</i>		
1. Support the development of a canoe trail. (1)	Support for plan.	No 2(a)
2. Opposed to restricting use of canoes to organised groups only. (2)	Text amended to clarify why its necessary to have registered guides.	Yes 1(e)
3. If Lot 10 is included in the nature reserve then CALM would run into trouble with the local scout groups annual canoe/raft day at Windabout Lake under Rec. 2. (1)	Scout activity is not located on the proposed canoe trail. CALM will liaise with Scout groups should there be potential conflicts.	No 2(b)
4. Windsurfing and sailing are not compatible with the nature reserves and should be prohibited. (1)	As indicated in the plan, these are low impact activities which will be monitored in accordance with Recommendation 5.	No 2(d)
5. The needs and concerns of recreational fishers do not appear to receive significant consideration. (1)	Recreational fishing will continue to be disallowed in the nature reserves.	No 2(f)
6. Consideration should be given to the fish population of the lakes and the possibility of fishing in some of their waters. (1)	See Comment 5 above.	No 2(f)

SUBMISSION COMMENTS (Number of Submissions)	DISCUSSION / ACTION TAKEN	PLAN AMENDED
7. Windabout, Woody and Wheatfield Lakes offer some potential for controlled access for recreational fishing. (1)	See Comment 5 above.	No 2(f)
8. The stocking of black bream could benefit the ecology of the lakes, provide additional tourist activities and result in low impact recreational activities. (1)	See Comment 5 above.	No 2(f)
<u>Water-skiing</u>		
1. Council requests time to investigate the concerns of CALM and the Water Ski Club, and that no decision be made in the near future until further discussion between the major stakeholders. (1)	Water-skiing will continue under a lease arrangement between CALM and the Esperance Water Ski Club during which time the environmental and social impacts will be researched. The lease will specify strict conditions for the activity which may include: <ul style="list-style-type: none"> • the payment of an annual lease fee; • adherence to Department of Transport requirements; • the establishment of a monitoring program to discern environmental and social impacts; • maintenance of the boat launching and carpark site; and • adherence to zoning requirements of this plan. Failure to meet the requirements of the lease or evidence of detrimental impacts may result in the activity being revoked.	Yes 1(c)
2. Oppose the continuation of water-skiing in any of the nature reserves for the following reasons: (4) <ul style="list-style-type: none"> • Activity is not compatible with nature reserves. • Activity is not compatible with Ramsar status. • Water-skiing conflicts with passive recreational activities. • Water-skiing conflicts with other recreational users. 	See Comment 1 above.	Yes 1(c)
3. Support the continuation of water-skiing on Woody Lake for the following reasons: (2) <ul style="list-style-type: none"> • The lakes have been used for skiing for over 30 years. • The birds and wildlife are not endangered in any way by water-skiing activities. • Alternative ski areas in the ocean are too dangerous for families. • Stating that skiing has long been regarded as incompatible in the reserves is both unclear and indistinct. <ul style="list-style-type: none"> • Water-skiing is enjoyed by about 20,000 people in WA alone and is one of the few true family sports which is evident at any skiing event. • The Community Survey which suggests public opinion is against water-skiing is unscientific and the results highly questionable. 	See Comment 1 above. CALM's primary objective in managing nature reserves is to maintain and restore the natural environment, and to protect, care for, and promote the study of indigenous flora and fauna, and to preserve any feature of archaeological, historic or scientific interest. Due to the lake size DOT specified that only five boats could use the Woody Lake ski area at one time. Irrespective of the small response to the survey and the small community outturn at public meetings, the views expressed of interested respondents and attendees should not be ignored.	Yes 1(c)

SUBMISSION COMMENTS (Number of Submissions)	DISCUSSION / ACTION TAKEN	PLAN AMENDED
<ul style="list-style-type: none"> A petition in support of the water-ski club has substantially more support than was shown for the draft management plan. Gazetted water-ski areas occur on other lakes within 'A' class reserves in WA, e.g. Towerinning, Norring, Porarucup and Jasper Lakes. The Club gained the Woody Lake ski area with the approval of DOT, CALM and Esperance Shire in 1989. The reversal of this stance by CALM is both surprising and disappointing. The Club has over 30 families and individuals as fully financial members and is a fully financial affiliated member of WAWSA. Skiing at water depths between 1.4m and 1.8m is restricted to members only and over 1.8m the lake is open to the general public. This is policed by the Club. A sign stating rules for the use of the lake was removed by CALM due to reasons of vandalism but the current Club will erect a new sign in keeping with CALM mandates. Once an area has been approved and gazetted by DOT there has to be very convincing arguments put to DOT as to reasons for de-gazetting. With 2,416 ha of wetlands in the 3,384 ha of nature reserves, the impact of using less than 10 ha or 0.29% of the area for water-skiing would be negligible if not nil. There is little and unclear evidence that water-skiing is incompatible in the nature reserve, and the impact on the Ramsar wetlands has been shown to be negligible to nil. The construction of a Club-funded barbecue area could be discussed and would be beneficial to all recreational users of the reserve. 	<p>None of the lakes mentioned are wetlands of international importance. Lake Towerinning is also in a reserve whose purpose includes aquatic sports.</p> <p>Restricting the sport to Woody Lake was not a decision initiated or imposed by CALM. The activity was deemed inappropriate in Lake Windabout after it failed to meet DOT safety requirements.</p> <p>CALM was (verbally) advised that the Club was defunct as most members were now engaged in other recreational activity in town.</p> <p>Members of the public could only utilise the lake with permission from the Club. Since the Club went 'dormant' and removal of the chain barrier by the Club, there has been no policing of skiing activities on the lake.</p> <p>It is not a CALM mandate to have the sign but a DOT requirement for an inland gazetted water ski area.</p> <p>The lake is vested in the NPNCA and it is presumed DOT will comply with the policy decisions in the final management plan.</p> <p>The assumption that all the lakes are identical and offer alternative refuge and feeding sites elsewhere in the system is incorrect.</p> <p>The impacts of water-skiing on Woody Lake have not been shown to be negligible to nil.</p>	
8.5 Horse-riding <i>4 submissions.</i>		
1. Support for Rec. 1. (3)	Support for plan.	No
2. Oppose Rec. 1. (1)	Reasons for the recommendation are outlined in the plan.	2(a)
		No
		2(d)
8.6 Off-road Vehicles <i>2 submissions.</i>		
1. Support for Rec. 1. (2)	Support for plan.	No
2. Support for Rec. 2. (1)	Support for plan.	2(a)
		No
		2(a)
9.0 COMMERCIAL VISITOR SERVICES <i>1 submission.</i>		
1. Concerned by the impacts of low flying aircraft on birds and increases in nutrients leaching into the Mullet Lake complex from any housing development on the Myrup fly-in estate. (1)	This will be mentioned in new section 4. Development of Adjoining Lands.	Yes 1(e)

SUBMISSION COMMENTS (Number of Submissions)	DISCUSSION / ACTION TAKEN	PLAN AMENDED
10.0 VISITOR SAFETY <i>No submissions.</i>		
11.0 DOMESTIC ANIMALS <i>1 submission.</i>		
1. Support for Rec. 1. (1)	Support for plan.	No 2(a)
12.0 MANAGEMENT OF COMMERCIAL AND OTHER USES		
12.1 Mining and Mineral Exploration <i>3 submissions.</i>		
1. Opposed to any mining or mineral exploration in the reserves. (1)	Covered by Recommendation 1.	No 2(d)
2. Amend Rec. 1 to read: 'Oppose exploration, mining and petroleum resource development both within and adjacent to the Reserves that would have a deleterious impact to any degree on the Reserves' values.' (1)	Already covered by Recommendation 1.	No 2(d)
3. Include new recommendation: 'CALM, in cooperation with the DEP and AgWA, implement research and mapping of Potential Acid Sulfate Soils (PASS) in low-lying coastal areas in, and adjacent to, the Reserves in order to restrict development which may, through the disturbance of PASS, degrade the adjacent natural environment.' (1)	Modified Strategy 4 in section 6.3 addresses mining impacts on reserves.	No 2(d)
4. Amend Rec. 2. to read: '... ensure that the Reserves' values, including Ramsar ecological characteristics, are protected.' (1)	Recommendation amended.	Yes 1(c)
12.2 Basic Raw Material Extraction <i>1 submission.</i>		
1. Opposed to any raw material extraction from the reserves. (1)	CALM and NPNCA policies address the extraction of raw material from reserves.	No 2(f)
12.3 Utilities and Services <i>2 submissions.</i>		
1. The proposed future deviation of the Coolgardie-Esperance Highway north of Esperance may impact on buffer zones for the Nature Reserves (particularly reserve A32259). This is still regarded as a realistic proposal which should be retained. (1)	CALM will negotiate conditions with Main Roads WA in accordance with revised Recommendation 2.	Yes 1(a)
2. The report 'Goldfields-Esperance Roads 2020' recommends ... that a local traffic study be carried out to determine the immediate and future needs of road access to Esperance Port, and that options for improving road access to the existing port, locating a new port and planning for an integrated corridor should be investigated. (1)	See Comment 1 above.	Yes 1(a)
3. Is there any action plan for possible spillage of chemicals from roads, railway lines and farms? (1)	The South Coast Regional Initiative Planning Team provides a forum for interagency cooperation in the development of contingency plans.	No 2(d)

SUBMISSION COMMENTS (Number of Submissions)	DISCUSSION / ACTION TAKEN	PLAN AMENDED
<p>12.4 Aquaculture <i>No submissions.</i></p> <p>12.5 Other Commercial Uses <i>No submissions.</i></p> <p>13.0 INFORMATION, INTERPRETATION AND EDUCATION <i>1 submission.</i></p> <p>1. Appropriate recreation areas for information include Lake Warden and the carparks at Wheatfield Lake, Woody Lake and Windabout Lake. (1)</p> <p>14.0 INTERACTION WITH THE COMMUNITY AND OTHER AUTHORITIES <i>6 submissions.</i></p> <p>1. Update to include the new Lake Warden Wetlands Conservation Group, and the Esperance Bird Observers Group. (2)</p> <p>2. (We) suggest the consultative frameworks used by the Marine Conservation Branch of CALM should be used as a model for considering the needs of key stakeholders such as recreational fishers. (1)</p> <p>3. Well-managed publicity and promotion with a high degree of local community involvement will greatly assist the implementation of the plan. (1)</p> <p>4. Insert an additional paragraph: 'Ongoing liaison with Environment Australia in relation to upholding Australia's obligations under the Ramsar Convention.' This should also be reflected in Rec. 1. (1)</p> <p>5. It may be appropriate to mention the South Coast Regional Initiative Planning Team (SCRIPT) as a method to encourage interaction with the community and other authorities. (1)</p> <p>6. The W&RC has recently employed a consultant to undertake a project titled 'South Coast Regional Wetland Evaluation - Esperance Water Resource Region', and will be liaising with CALM to ensure consistency with the management plan. (1)</p> <p>15.0 RESEARCH AND MONITORING <i>No submissions.</i></p> <p>16.0 RESOURCES <i>No submissions.</i></p>	<p>This is acknowledged.</p> <p>Information added.</p> <p>Consultation with key stakeholders will continue in accordance with strategies in this section.</p> <p>This is acknowledged.</p> <p>Information added.</p> <p>Information added.</p> <p>Liaison will occur in accordance with strategies in this section.</p>	<p>No 2(d)</p> <p>Yes 1(b)</p> <p>No 2(d)</p> <p>No 2(d)</p> <p>Yes 1(d)</p> <p>Yes 1(d)</p> <p>No 2(d)</p>

<i>SUBMISSION COMMENTS (Number of Submissions)</i>	<i>DISCUSSION / ACTION TAKEN</i>	<i>PLAN AMENDED</i>
17.0 PRIORITIES <i>3 submissions.</i> 1. All recommendations (in Table 5) are very relevant. (1) 2. Support all key recommendations in Table 5.(1) 3. Encourage CALM to consider LWWCG's priorities when applying priorities to recommendations and implementation. (1)	Support for plan. Support for plan. CALM will liaise with relevant stakeholders in determining priorities.	No 2(b) No 2(a) No 2(d)
18.0 EVALUATION AND REVIEW <i>No submissions.</i>		
REFERENCES <i>1 submission.</i> 1. Reference to Platt (1995) may be more appropriate as Esperance Land Conservation District Committee (ELCDC, 1995). (1)	Reference has been changed to Platt <i>et al.</i> 1996.	Yes 1(e)

APPENDIX 1. SUBMITTERS TO DRAFT MANAGEMENT PLAN

Individuals

Mr Gary English
Mr Stephen Lance

Recreation Groups

Esperance Water Ski Club
Recfishwest

Community Groups

Denmark Environment Centre
Esperance Bird Observers Group
Lake Warden Wetlands Conservation Group

Government Agencies

Agriculture WA - Esperance Catchment Support Team
Agriculture WA - Sustainable Rural Development Program
CALM Esperance District
CALM South Coast Region
Environment Australia - Biodiversity Group
Esperance Shire Council
Heritage Council of Western Australia
Main Roads Western Australia - Standards and Audit
Water & Rivers Commission - Strategic Projects