

Swan Estuary Marine Park and Adjacent Nature Reserves

Analysis of Public Submissions



MANAGEMENT PLAN NO 41



Department of Conservation
and Land Management



National Parks and Nature
Conservation Authority



Marine Parks and
Reserves Authority

ANALYSIS OF PUBLIC SUBMISSIONS
to the Draft Management Plan
for
Swan Estuary Marine Park
and
Adjacent Nature Reserves

Department of Conservation and Land Management
for the
Marine Parks and Reserves Authority
and
National Parks and Nature Conservation Authority
Perth, Western Australia, 1999

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INTRODUCTION

This document is an analysis of public submissions to the draft management plan for the Swan Estuary Marine Park and Adjacent Nature Reserves Draft Management Plan 1996. Comments have been detailed to the section of the draft management plan to which they refer.

The Swan Estuary Marine Park and Adjacent Nature Reserves Draft Management Plan was released for public comment on 2 March 1997 for a period of two months. Late submissions were accepted. A total of 22 public submissions were received. All submissions have been summarised and changes have been made to the plan where appropriate.

Following the release of the plan, advertisements were placed in local and Statewide newspapers advising that the draft management plan was available for comment. The draft plan was distributed to State Government departments, tertiary institutions, recreation and conservation groups, local authorities, libraries and numerous individuals who expressed interest during the preparation of the draft. Copies of the plan were available for perusal at CALM and local government offices. The plan was available for purchase from CALM's State Operations Headquarters and CALM offices at Crawley and Fremantle.

ANALYSIS OF PUBLIC SUBMISSIONS

Method of Analysis

The public submissions to the Swan Estuary Marine Park and Adjacent Nature Reserves Draft Management Plan were analysed according to the process depicted in the flow chart. 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. The draft management plan **was amended** if the submission:
 - (a) provided additional resource information of direct relevance to management;
 - (b) provided additional information on affected user groups of direct relevance to management;
 - (c) indicated a change in (or clarified) Government legislation, management commitment or management policy;
 - (d) proposed strategies that would better achieve management goals and objectives; or
 - (e) indicated omissions, inaccuracies or a lack of clarity.
 2. The draft management plan **was not amended** if the submission:
 - (a) clearly supported the draft proposals;
 - (b) offered a neutral statement, or no change was sought;
 - (c) addressed issues beyond the scope of the plan;
 - (d) made points which were already in the plan, or had been considered during plan preparation;
 - (e) was one amongst several widely divergent viewpoints received on the topic and the recommendation of the draft plan was still considered the best option;
 - (f) contributed options which were not possible (generally due to some aspect of 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. Minor editorial changes referred to in the submissions have also been made.

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

Number and Origin of Submissions

The number and place of origin of submissions are listed below.

	Number	Percentage
Individuals	9	41
Community Organisations	3	14
Government (Local)	3	14
Government (State)	6	27
CALM	1	4
TOTAL	22	100

A list of the submitters to the Swan Estuary Marine Park and Adjacent Nature Reserves Draft Management Plan is given in Appendix 1.

ANALYSIS TABLE

The Analysis Table contains:

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

SUBMISSION COMMENTS	DISCUSSION / ACTION TAKEN	PLAN AMENDED
General Comments		
<i>13 submissions.</i>		
1. We commend the NPNCA and CALM for their efforts in the establishment of the Draft Management Plan. We found the plan to be well prepared and agree with the key issues and recommendations that are outlined.	Support for plan.	No 2a
2. The plan is lacking in detail. Many of the recommendations are generalised objectives, making it difficult to comment.	Detail increased.	Yes 1d
3. Many recommendations are indefinite ie to consider, investigate, identify. In a number of cases there appears to be no real reason why a definite action cannot be expressed.	Strategies made more definite.	Yes 1d
4. Although the draft plan contains many useful recommendations the tenor of them is too general.	Strategies made more specific.	Yes 1d
5. We have no specific comments, but note that we will continue to be interested in any further developments in the context of the broader management of the whole of the Swan Avon Catchment.	Noted.	No 2b
6. The values recognised for the areas covered by the Draft Plan are recognised and management goals outlined in the Draft Plan are supported as being appropriate to these areas and values.	Support for the plan.	No 2a
7. The key recommendations relating to management, monitoring, critical research, drainage, weeds, vegetation rehabilitation and education-community involvement are supported.	Support for the plan.	No 2a
8. Research information in the draft management plan is out dated, new research should be taking place to give a clearer picture of the proposals.	Plan updated.	Yes 1e
9. The draft management plan proposes 7 broad management goals and 44 objectives supported by 124 recommendations. While the goals and objectives are sound and comprehensive, the recommendations despite being numerous, are very general and passive in nature and give very little indication of how the objectives will actually be achieved.	Strategies strengthened.	Yes 1d
10. The plan lacks prescriptive recommendations. It also contains very little site information. It is of concern that this plan for such significant environmental areas has been prepared with only limited documented knowledge about them, and that this knowledge base has not increased during the past three years of planning.	Strategies made more prescriptive.	Yes 1d
11. The plan contains very little of substance and does not reassure the reader that the Park will be actively managed on the ground in the short term.	Noted.	No 2d

SUBMISSION COMMENTS	DISCUSSION / ACTION TAKEN	PLAN AMENDED
General Comments contd.		
12. The level of generality in the plan makes commenting difficult and is raised as an issue of concern.	Noted.	No 2b
13. General support for the Plan.	Noted.	No 2a
INTRODUCTION		
1. Overview <i>No submissions.</i>		
2. Values <i>No submissions.</i>		
3. Community Involvement in the Draft Plan <i>No submissions.</i>		
PRINCIPAL MANAGEMENT DIRECTIONS		
4. Policies and Goals <i>No submissions.</i>		
5. Tenure and Boundaries <i>9 submissions.</i>		
1. The recognised values of the Marine Park are more likely to be sustainable if adjacent areas can be reserved as indicated.	Support for the plan.	No 2a
2. Strong support is given for restoring areas of native vegetation to make these more sustainable and effective in providing fauna habitat.	Support for the plan.	No 2a
3. Parts of Alfred Cove are in need of native vegetation restoration whilst the grassed area at the tip of Point Waylen should be converted over to native vegetation. This would create a more effective setback and buffer for waterbirds from people activities. A dog/cat/people proof fence is necessary.	Support for the plan.	No 2a
4. I am of the understanding that Marine Nature Reserves are for the conservation and restoration of the natural environment whilst Marine Parks fulfil the demands for public recreation followed by conservation of flora and fauna. Considering the large area of the Swan Estuary available for public recreation should not these areas be reserves with the conservation of flora and fauna being their main consideration?	The strategy in the plan is considered the best option. A marine park is reserved for marine conservation. It also provides for a range of compatible recreational and commercial uses.	No 2d
5. The proposed Marine Park at Alfred Cove should be extended to give more protection to this fragile environment.	Other areas important for waders and waterbirds and of high conservation value will be investigated for possible additions to the Marine Park. See Recommendation 2.	No 2d

<i>SUBMISSION COMMENTS</i>	<i>DISCUSSION / ACTION TAKEN</i>	<i>PLAN AMENDED</i>
5. Tenure and Boundaries contd		
6. The Land Act, which is before Parliament, may have influence on the Draft Management Plan particularly with regard to future acquisition and consolidation of reserves. Recognition of this and its consequences should be included in the management plan.	Considered during Plan preparation	No 2d
7. Recommendations 5.1, 5.2, 5.4 and 5.5 recommend investigating the possibilities of amending the boundaries of the Alfred Cove Nature Reserve. The proposal would help clear confusion over which authorities are responsible for maintenance of certain areas. However, before the recommendations are endorsed more detail in the form of actual locations of the amended boundaries should be prepared.	Text amended.	Yes 1d
8. It is recommended that the reserve boundaries and wildlife protection zones be permanently identified on land and water using appropriate markers.	Already in the Plan (Recommendation 6.2).	No 2d
9. The radio communications tower should be removed, the activities relocated, and the land incorporated into the Swan Estuary Marine Park (to be upgraded to Park standard).	Text amended - It will eventually be removed and the area added to the Alfred Cove Nature Reserve.	Yes 1d
6. Zoning <i>17 submissions.</i>		
1. Boats above 8hp need to be kept out of the Alfred Cove area.	Support for the plan.	No 2a
2. I support the zoning proposed for the Alfred Cove area (map 3) and the table of uses permitted in each zone.	Support for the plan.	No 2a
3. I seek assurance that the river recreation ie swimming, crabbing and prawning in the beach area between Ness Road and Conon Road will not be affected by the implementation of the plan.	Crabbing and prawning are permitted activities in this area. Swimming is not considered a problem in the marine park.	No 2d
4. The maps included in the plan are not sufficiently detailed to determine just where the zones will be delineated.	Maps amended	Yes 1e
5. It appears that it is proposed to ban board sailing over the most used section (facing the car park) of the sandbank. As this area is a small part of the proposed wildlife protection zone I oppose the denial of the area to the sport.	Text amended.	Yes 1d
6. It is not known from the zoning diagram (Map 3) if the boundaries as shown already provide an adequate buffer from adjacent recreation and commercial activities. If not, the boundaries should be extended.	Considered during plan preparation.	No 2d
7. The only uses permitted within the marine park should be confined to those such as nature observation and education.	Considered during plan preparation. Marine parks are reserved for conservation and provide for a range of compatible recreation uses.	No 2e

<i>SUBMISSION COMMENTS</i>	<i>DISCUSSION / ACTION TAKEN</i>	<i>PLAN AMENDED</i>
6. Zoning contd		
8. The wildlife protection zones occupy roughly half or less than half of the total area within each marine park. The total area of waterway being managed sufficiently in the interest of conservation, therefore is considerably less than the 340 ha stated.	Noted. The Seagrass Protection zone provides for conservation as well as compatible recreation. It is part of the Marine Park.	No 2d
9. The ban on anchoring should be extended to include the seagrass 'protection' zones of the marine park.	Considered during plan preparation.	No 2d
10. The zoning of the nature reserves appears to finish at the high water mark, while that of the marine park finishes at low water mark. This is to be overcome in areas of low lying vegetation by extending the land-based reserves (section 5, recommendation 1), but apparently not in other areas. This leaves the beach sections unreserved, and therefore without regulation of the traffic of people and pets. The reserves and the marine park should be joined at the length of the waterline boundaries.	Text amended. Clarification that the Marine Park and Nature Reserves will be joined at the vegetation line.	Yes 1e
11. The zoning categories for the aquatic zones offer only a small degree of protection, especially for the Seagrass Protection zone. It would be sensible to unify the two aquatic zones, with one set of boundary markers clearly defining the zone. The zone should be upgraded to a Sanctuary zone.	The strategy in the plan is considered the best option.	No 2d
12. The use of anchors in the seagrass protection zone is counterproductive, ripping up areas of seagrass, and raising mud which reduces light, and settles on surrounding plants, further reducing their growth.	Considered during plan preparation.	No 2d
13. Prawning and fishing should not be allowed in these reserves. This Marine Park should be set aside for the protection of flora and fauna. Prawning and fishing cause destruction to wader habitat and disturb birds loafing and feeding.	The impact of crabbing and prawning on the conservation values of the reserve will be assessed and restrictions imposed on the Wildlife Protection zone if appropriate.	No 2d
14. The use of zones in defining management areas is supported as a mechanism of allocating and segregating permitted uses and management actions. However, anchoring in the Special Purpose (Seagrass Protection) Zone will need close monitoring and management to minimise damage to the seagrass beds. If the level of use of these areas or the damage caused by anchoring is likely to cause problems fixed point moorings may be required as a management option.	Considered during plan preparation.	No 2d

<i>SUBMISSION COMMENTS</i>	<i>DISCUSSION / ACTION TAKEN</i>	<i>PLAN AMENDED</i>
6. Zoning contd		
15. The loss of access to recreational fishers at Alfred Cove is too large. Access to one of the most popular recreational prawning areas on the south foreshore of the Swan River area is taken away by the proposals. We feel that the west boundary of the reserve should go no further than Booker Street in Attadale. This would leave the most popular prawning areas available to recreational anglers. Loss of the areas to the east would have little effect on recreational fishing activities.	The strategy in the plan is still considered best option (access through the nature reserves will be permitted)	No 2e
16. Any restriction on access to recreational anglers should be moved 400m to the east of Hackett Drive to allow a greater area for angling. Recreational anglers will most probably park at Hackett Drive and walk either side to go prawning, this extension would help reduce pressure on the area.	The strategy in the plan is still considered the best option	No 2e
17. If areas are to be closed off then no commercial fishing should be allowed. Recreational anglers should not be the only ones to suffer loss of access to the river on environmental grounds, only to allow commercial fishing to take place regardless of the reasons for closure.	Limited commercial and recreational fishing will be allowed in the Park and will be regulated under the Fish Resources Management Act. Stringent monitoring conditions are placed on commercial net fishing licences. Access through the nature reserve areas will be allowed.	No 2e
7. Interagency Responsibilities and Integrated Operations		
<i>3 submissions.</i>		
1. Law enforcement to ensure protection from other values is feeble given the lack of resources.	Considered during Plan preparation	No 2d
2. The arrangements for management of the marine park appear to depend on other agencies (Swan River Trust and Fisheries WA). These agencies have a wide brief in terms of the geographical area that they cover, and the various functions they perform. Their coverage of the park will be lost in their other operations. The management role assumed by CALM needs to be more substantial.	Section 13 of the CALM Act provides for the reservation of WA waters as marine park. Marine parks are established for the conservation of marine and estuarine habitats, for recreation and nature conservation purposes, scientific study and preservation of features of archaeological, historic or scientific interest. CALM prepares and implements plans for conservation lands and waters Statewide. CALM also is responsible for the management of the State's flora and fauna as a whole. Amendments to the legislative responsibilities of CALM and other State agencies are beyond the scope of this plan.	No 2f
3. A Memorandum of Understanding between CALM and the Swan River Trust is an essential mechanism to clearly specify management responsibilities and procedures. The memorandum needs to address such issues as: - Part 5 referrals to the Swan River Trust of work specified under the Swan River Trust Act of 1988, - improving water quality and environmental monitoring efforts relevant to Park management.	Noted.	No 2c

SUBMISSION COMMENTS	DISCUSSION / ACTION TAKEN	PLAN AMENDED
CONSERVATION		
8. Conservation Overview <i>No submissions.</i>		
9. Geology, Geomorphology and Soils <i>No submissions.</i>		
10. Flora, Fauna and Habitat <i>1 submission.</i>		
1. Fauna: The Brush-tailed possum was observed at Pelican Point in about 1985 and is probably still present. There is a small population of the variegated fairy wren, <i>Malurus lamberti</i> , at Pelican Point, which is the southern most record of this species on the coastal plain. A small population of the varied sittella <i>Daphoenositta chrysoptera</i> was present at Alfred Cove in the mid 1980's and may still be present. The rakali or water-rat, <i>Hydromys chrysogaster</i> is present at Alfred Cove.	Additional resource information.	Yes 1a
11. Waders and Other Waterbirds <i>4 submissions.</i>		
1. Wader numbers have declined. Counts of over 1000 birds are now rare and on most recent visits fewer than 500 waders have been present on the three reserves. The virtual disappearance of the sharp tailed sandpiper from the estuary coincided with the construction of the Narrows Interchange. The decline of red-necked stints and curlew sandpipers has accelerated since the early 1980's.	Noted. Additional resource information	Yes 1a
2. One of the most important wader roosts lies just outside Milyu. There are several beaches between the Mill Point road overpass and the Narrows Bridge which are used for roosting by small waders. There has been a recent proposal to designate the water adjacent to these beaches for use by jet skis and if implemented would likely cause disturbance to these birds.	Beyond the scope of the plan.	No 2c
3. Recent comments by bird-watchers suggests that the Buff-banded Rail is now scarce or absent from the estuary reserves.	Noted. Additional resource information.	Yes 1a
4. Ospreys utilise the communications tower set in the samphire on the foreshore at Alfred Cove as a perching and roosting site. It is suggested that a nesting platform be erected in the tower similar to others used in the north-west of the State. The communications mast at Pelican Point could also be investigated for the same purpose.	Considered during plan preparation.	No 2d

SUBMISSION COMMENTS	DISCUSSION / ACTION TAKEN	PLAN AMENDED
12. Estuarine Processes and Water Quality <i>3 submissions.</i>		
1. The Water Corporation is aware of the concerns of CALM and the Swan River Trust with regards to the probability of overflow from the Melville Reservoir impacting on the marine park and will take every precaution to ensure no overflows occur.	Noted.	No <i>2b</i>
2. The section on drainage is inadequate. The existing drainage system needs to be modified to remove pollutants and to guard against spillage's from trucks on nearby roads entering the reserve.	Text amended. A drainage rationalisation program has been developed and improvements have been and will continue to be made.	Yes <i>1e</i>
3. There is a need to clearly identify cost and management effective monitoring efforts regarding water quality from drains, in nearshore water and in assessing weed problems.	Text amended.	Yes <i>1d</i>
13. Cultural History <i>No submissions.</i>		
14. Landscapes and Seascapes <i>No submissions.</i>		
15. Rehabilitation <i>4 submissions.</i>		
1. Recommendation 15.4 includes the consideration of views in respect of restoring local vegetation. In view of the aim of the Swan River Trust to preserve and maintain the natural riparian vegetation, this proviso is not likely to improve the situation and should be removed. Planting in clusters will partially achieve the effect of allowing some views of the water. Protection of clumps of trees is likely to be necessary. Education of residents in respect of the value of trees in the riparian situation is required.	Text amended	Yes <i>1d</i>
2. The proposed rehabilitation program is supported. This is another area where schools and community groups could assist CALM to implement the plan.	Support for the plan. Community involvement in managing the reserve and surrounding areas is encouraged. See Section 30, Community Involvement.	No <i>2a</i>
3. Recommendations should be reworded to 'Maintain and restore local vegetation to its former situation and condition to the extent and rate advisable, giving full consideration to the values, in the broadest sense, of the existing species, both local and non local'.	Text amended.	Yes <i>1d</i>
4. Close monitoring of native vegetation restoration and eradication of weed and non-native vegetation in the three reserve areas, particularly in the Alfred Cove area, will be required to assess its success.	Monitoring will be part of the program developed to control weeds and non local species. See Section 16.	No <i>2d</i>

SUBMISSION COMMENTS	DISCUSSION / ACTION TAKEN	PLAN AMENDED
16. Non-Local Plants, Weeds and Diseases 2 submissions. 1. The plan appears to imply that non local species have a negative value for the nature reserve. The plan should state that 'the removal of non-local tree species such as <i>Eucalyptus camaldulensis</i> and <i>Casuarina glauca</i> should not occur until a balanced assessment has been made of their perceived positive, as well as perceived negative impacts'. The removal of non-local species may jeopardise the protection and conservation values if it is not based on sound scientific evidence. 2. The statement in Section 16 that certain non-local species are 'out competing native species and need to be removed' needs to be supported by a reference to factual scientific evidence or qualified by the insertion of the words 'possibly' before each of the words 'out-competing' and 'need'. The cross reference to Section 15 is inadequate as that section contains suppositions only, not firm evidence.	Text amended Text amended.	Yes 1d Yes 1d
17. Pets and Feral Animals 5 submissions. 1. The comments about pets and feral animals are supported. 2. Rabbits and foxes are present at Pelican Point. The brown rat <i>Rattus norvegicus</i> occurs in the limestone groynes at Milyu. 3. It is critical to protect fauna from household pets. The restriction on domestic pets needs to be policed. 4. Appropriate pet proof fencing is essential. Pet proof fencing at Alfred Cove should be placed as far back from the foreshore as possible to allow the current grassed area to be revegetated and contained on the river side of the fence. Community education and frequent ranger patrols are necessary to restrict pets.. 5. Fencing of the reserve is more likely to achieve the effect of keeping domestic pets out along with cat confinement/curfews.	Support for the Plan. Noted. Additional resource information. Pets are not permitted in the reserve system. The plan recognises the importance of restricting domestic pets from the reserve. Further fencing at Alfred Cove is proposed. See Section 26. It is proposed to extend the fencing at Alfred Cove to enclose Alfred Cove and Point Waylen. A communications plan that incorporates education will be developed. It is proposed to extend the fencing at Alfred Cove to enclose Alfred Cove and Point Waylen.	No 2a Yes 1a No 2d No 2d No 2d
18. Fire 5 submissions. 1. The management plan needs an additional map showing the location of fuel reduced buffer areas in the land component of the three reserves. 2. Burning operations are mentioned in Section 10, Recommendation 10.3 this appears to be negated in Section 18. The City of Melville has a no burn policy for its parks and reserves, and has developed a fire reduction policy which could be useful if adopted in these areas.	Text amended, however not appropriate to include an additional map. Noted - text amended.	Yes 1e Yes 1e

<i>SUBMISSION COMMENTS</i>	<i>DISCUSSION / ACTION TAKEN</i>	<i>PLAN AMENDED</i>
18. Fire contd		
3. We are opposed to prescribed burning in these small reserves. Fire breaks should be quite adequate for fire control purposes. Signage could also be effective. Fire suppression plans are strongly supported.	Support for the plan. The reserves are small enough not to need a strategy for prescribed burning. Fuel reduced buffers can be created by slashing or a combination of slashing and burning.	No 2a
4. Recommendation 18.3 does not mention the use of controlled burns to achieve fuel reduced areas, the supporting text does. The City of Melville has a 'no burn' policy, the use of burns for fuel reduction is a last resort and used only when no other options are feasible.	Text amended.	Yes 1d
5. The relatively small area of vegetation in the Alfred Cove Reserve does not warrant the use of controlled burns when the associated negative environmental, aesthetic and social impacts are considered.	Text amended.	Yes 1d
RECREATION		
19. Recreation Overview 5 submissions.		
1. The comments made on recreation are supported.	Support for the Plan.	No 2a
2. It is difficult to see how the recreational and commercial fishing/boating activities in the Marine Park are compatible with the objectives of conserving the Park's values. There is the other 99% of the river to accommodate them.	The strategy in the plan is still considered the best option.	No 2e
3. I recommend that recreational activities of line and commercial fishing; prawning and crabbing; motorised and non-motorised boating; windsurfing/sailing; anchorage and commercial tour operators be banned completely within the Marine Park as they are inconsistent with conservation of the natural environment and protection of indigenous flora and fauna.	Plan option still considered most appropriate.	No 2e
4. The need to research the impact of recreational pressures on the Park (prawning, crabbing and windsurfing) is supported.	Support for the Plan.	No 2a
5. No fees should be charged for access to the nature reserves and marine park.	Support for the Plan.	No 2a
20. Line Fishing 2 submissions.		
1. Lines and lead weights can be detrimental to birdlife and other organisms. The shallows and seagrass beds, according to the plan, provide a feeding ground and nursery area for juvenile fish and prawns. These are an important food source for the birdlife of the adjacent reserves.	Considered during Plan preparation.	No 2d
2. We support the recommendations in the draft plan.	Support for the Plan.	No 2a

SUBMISSION COMMENTS	DISCUSSION / ACTION TAKEN	PLAN AMENDED
21. Collecting <i>1 submission.</i> 1. The recommendations in the draft plan are supported	Support for the Plan.	No 2a
22. Prawning and Crabbing <i>14 submissions.</i> 1. Crabbing and prawning are popular recreational pastimes in the Alfred Cove area. We would be against any further restrictions to the area of catchment than that proposed in the draft plan.	Support for the Plan.	No 2a
2. Prawning and crabbing has an adverse impact - mud flats are trampled and disturbed, debris is left to rot (prawn shells, jellyfish, decaying organisms etc) which encourages cats and vermin.	Text amended - Recommendation Section 22.	Yes 1d
3. It is prudent and responsible risk management to assume now that these activities are degrading the habitat and to respond with precautionary measures. An additional recommendation should be inserted - 'Prohibit recreational prawning and crabbing and related activities in that area of the Alfred Cove Wildlife Protection Zone lying south of a line extending approximately south eastward from Point Waylen to the opposite side of Alfred Cove adjacent to Tompkins Park (H).' this recommendation leaves the majority of the Wildlife Protection Zone adjacent to the Burke Drive Nature Reserve accessible for prawning and crabbing while the impact assessment under recommendation 2 is undertaken.	The strategy in the Plan is still considered the best option.	No 2e
4. This recommendation effectively bans prawning within the Marine Park by restricting the only practical access to and from the fishing grounds, which is through nature reserves and proposed nature reserves. It is suggested that in order to protect the environmental values of the area and allow recreational prawning and crabbing, some form of controlled access be permitted for recreational fishers. This may include designated areas through which prawners can have access to the water and clean their nets.	Text amended. Access will be allowed.	Yes 1b
5. The disposal of waste by recreational prawn fishers has been raised as an issue in the plan. The best method for disposing of unwanted catch is to return it to the water. Other options suggested are the use of refuse bins or cleaning facilities at designated cleaning/access areas. The chosen option will need to be communicated to the recreational fishers.	Text amended.	Yes 1b
6. Most prawning and crabbing occurs for only 6-8 weeks of the year and any impact should be managed to allow the activity to continue in some areas of the marine park.	Support for the Plan.	No 2a

<i>SUBMISSION COMMENTS</i>	<i>DISCUSSION / ACTION TAKEN</i>	<i>PLAN AMENDED</i>
22. Prawning and Crabbing contd		
7. The Recreational Fishing Advisory Committee should be kept informed of the outcomes of further assessment of the impact of prawning and crabbing activities.	Noted.	No 2b
8. Recommendation 3 should be deleted. The results of recommendation 2 would determine the future of prawning and crabbing in the wildlife protection zone within the Marine Park.	Text amended (Recommendations 2 & 3 combined).	Yes 1e
9. Full access for prawning and crabbing activities should be maintained for the area between the boat ramp near the end of Stock Road to the point where Booker Street intersects the shore. This is traditionally a popular prawning and crabbing area.	Support for the Plan.	No 2a
10. Laying the blame on recreational prawners for rubbish and associated feral animal problems is too bold, as these problems occur all around the river regardless of the level of recreational prawning/fishing.	Text amended.	Yes 1b
11. Recommendation 22.1 proposes to prohibit recreational prawning and crabbing and related activities in the nature reserve (foreshore areas) associated with the Marine Park. This recommendation is supported.	Support for the Plan.	No 2a
12. Recommendation 22.3 and 22.4 propose that consideration be given to limiting access to the wildlife protection zone of the Park and in particular prohibiting prawning and crabbing. The plan should be strengthened by recommending these activities be prohibited.	Noted. Text amended pending further impact assessments of the activity in this zone.	Yes 1d
13. Support for Recommendation 22.1 prohibiting recreational prawning, crabbing and other related activities including boat landing in the nature reserves and proposed nature reserve areas.	Support for the Plan.	No 2a
14. Supports Recommendation 22.3 to consider prohibiting recreational prawning and crabbing in the wildlife protection zone.	Support for the Plan.	No 2a
23. Spearfishing <i>No submissions.</i>		
24. Boating and Surface Water Sports <i>3 submissions.</i>		
1. Noise pollution can affect the behaviour of birds and other animals. Waterbirds may be disturbed by craft to a degree that affects their feeding and mating capabilities.	Noted.	No 2b
2. Clarification required of Recommendation 24.2 concerning the prohibition of jet skis within or adjacent to areas of the Park.	Text amended to clarify.	Yes 1e

SUBMISSION COMMENTS	DISCUSSION / ACTION TAKEN	PLAN AMENDED
24. Boating and Surface Water Sports contd 3. This section needs revising. We support moves to prohibit jet skis in the Marine Park and to remove boat moorings. However, we believe that all boating in the Marine Park should be banned as it disturbs the fish and birds. These activities are available at most places on the river.	Considered during Plan preparation.	No 2d
25. Wildlife Observation and Interaction 2 submissions.		
1. Waders need a few small stretches of beach where they will not be disturbed. The construction of a sand-bar in Milyu to give the birds a safe place to roost should be given some consideration.	Considered during Plan preparation.	No 2d
2. I am not sure that the lookout platform at Pelican Point is used extensively by bird-watchers.	Noted.	No 2b
26. Day-Use, Access and Nature Walks 5 submissions.		
1. The proposed boardwalk and information centre at Alfred Cove is supported provided it does not intrude into valuable conservation areas. Education, signage and controlled access are the best way to protect these reserves.	Noted.	No 2d
2. The proposed fencing of Alfred Cove is strongly supported (same comment made in 2 separate submissions).	Support for the Plan.	No 2a
3. In view of the inclusion of Recommendation 2 for construction of a boardwalk, we submit that the supporting text on page 19 (final para) should include the caution that 'A boardwalk is proposed subject to a review of its potential negative impact on conservation values including the probability of increased vandalism and other anti-social conduct which has been a problem in the vicinity of the adjacent Troy Park parking area over several years'.	Text amended, design will take this into account.	Yes 1b
4. The draft plan does not indicate whether the proposed information centre would be based in the existing building or what scale it would be. These are important questions in determining its impact on local residents and while the concept is positive, insufficient information is given to support it at this stage.	Text amended.	Yes 1d
5. The construction of an information shelter near the Burke Drive dual use path, opposite Haig road is supported.	Support for the Plan.	No 2a
27. Organised Events No submissions.		

SUBMISSION COMMENTS	DISCUSSION / ACTION TAKEN	PLAN AMENDED
COMMUNITY RELATIONS		
28. Information, Promotion and Interpretation <i>No submissions.</i>		
29. Education <i>1 submission.</i>		
1. Running a program for community education on the importance of the marine park is going to be hard if people see the area being compromised from other activities.	Noted.	No 2b
30. Community Involvement <i>No submissions.</i>		
COMMERCIAL AND OTHER USES		
31. Commercial Overview <i>No submissions.</i>		
32. Commercial Fishing <i>2 submissions.</i>		
1. The literature references that might relate to this activity are dated in excess of 15 years ago and one has to question their relevance to the current evaluation of impacts on the marine park.	Text amended - information updated.	Yes 1d
2. Commercial fishing is an inappropriate activity within a marine park and is strongly opposed.	Considered during Plan preparation.	No 2d
33. Commercial Concessions <i>7 submissions.</i>		
1. Commercial operations of any kind should not be tolerated in the Alfred Cove area due to their degenerative affects.	These will be considered on a case by case basis and controlled through licence conditions if approved by the NPNCA.	No 2d
2. Commercial operators which have no positive affect should be excluded from this unique area (Alfred Cove). The draft plan presents an opportunity to do this.	Text amended.	Yes 1d
3. The observation of waders and waterbirds in the reserves as a basis for a tour must be approached with some caution. such a tour would, in our view, need to be incorporated as one aspect of a larger tour with other features of general interest to tourists or alternatively the tour would need to be targeted at the special interest market as a dedicated bird watching tour.	Noted.	No 2b
4. Nature based tourism/local community programs are supported. If managed effectively these are seen as not incompatible with the conservation objectives.	Support for the Plan.	No 2a
5. Tours should be allowed to operate but should be restricted to the periphery of the Marine Park and Nature Reserves, where a bird watch station could be developed, incorporating educational information shelters with pay-telescope facilities.	The strategy in the plan is still considered the best option.	No 2e

SUBMISSION COMMENTS	DISCUSSION/ACTION TAKEN	PLAN AMENDED
33. Commercial Concessions contd 6. The possible use of the former Point Waylen radio transmission facility by a radio station is not an activity that is compatible with the conservation values and goals of the plan. We recommend that consideration of that option be deleted from the plan. 7. Preference for tour operators should be given to community based organisations concerned with nature conservation and any such activities should preferably operate in association with the proposed information centre.	Considered during Plan preparation. Noted. Text amended.	No 2d Yes 1d
34. Water Transport Services <i>No submissions.</i>		
35. Structures, Facilities and Developments <i>1 submission.</i> 1. The existing communications tower detracts from the appeal of the extended reserve system. Insert an addition recommendation under Section 35 - 'Remove the existing Point Waylen communications tower if it becomes part of the reserve system. (H)'	Text amended.	Yes 1d
INTERACTION WITH NEARBY LANDS AND WATERS		
36. Private Property <i>No submissions.</i>		
37. Government Lands and Waters <i>5 submissions.</i> 1. The Melville City Council carpark adjacent to the foreshore at Cunningham Street should be removed and the area restored to grass and reed areas. The carpark attracts undesirables who create noise and scare of the birds on the nature reserve. There is alternative parking nearby. 2. The spot lights installed in Troy Park shine on the centre of the nature reserve and across the river to the reed area of Melville Beach Road. These lights frighten waterbirds and should at least be diffused. 3. This section should also include a statement that 'local government support should also be obtained for the installation of barriers around the grassed area between the proposed boardwalk and the Troy Park entrance, to prevent its use as an unofficial carpark'. 4. The plan contains no reference to the possible significant negative impacts on waterbirds of the glare from floodlights in the Troy and Tompkins Park areas. the plan should include a high priority recommendation that research be carried out on the possible impacts of the floodlights.	Beyond the scope of the Plan. To be discussed with the Melville City Council. Text amended. Beyond the scope of the Plan. To be discussed with the Melville City Council. Text amended.	No 2d Yes 1d No 2c Yes 1d

SUBMISSION COMMENTS	DISCUSSION / ACTION TAKEN	PLAN AMENDED
37. Government Lands and Waters contd 5. Local government should be encouraged to fit shields to the lights in Troy and Tompkins Parks to limit the amount of peripheral glare if research indicates such glare is a potential disturbance to waterbirds/marine life. A recommendation to this effect should be included.	Text amended.	Yes <i>1d</i>
RESEARCH AND MONITORING 38. Overview <i>1 submission.</i> 1. The recommendations of this section are supported.	Support for the Plan.	No <i>2a</i>
39. Nature Conservation <i>1 submission.</i> 1. If the implementation of a management plan for the estuary reserves does have a beneficial effect on waterbirds, counting and banding studies should be part of the plan so that the effects can be documented. (Colour leg flags are available for wader banding which makes it possible to tell where a bird was banded.)	Text amended.	Yes <i>1d</i>
40. Social Research <i>1 submission.</i> 1. Section 36 aims to encourage sympathetic management of nearby residential properties by their private owners, as part of that strategy property owners need to be aware of the reserve system. Include an additional recommendation - 'survey local property owner's attitudes and awareness of the goals and values of the reserve system and how they can contribute to its ongoing management'.	Text amended.	Yes <i>1d</i>
PLAN IMPLEMENTATION <i>3 submissions.</i> 1. The recommendations in sections 41 to 44 are supported given the fundamental necessity for human and financial resources to implement the plan.	Support for the Plan.	No <i>2a</i>
2. There is no mention of the role of community groups in this Chapter. The Wetlands Conservation Society would be willing to assist, on a cost recovery basis, with the monitoring of these reserves.	Text amended (see Recommendation 39.5).	Yes <i>1b</i>
3. The inclusion of an outline of the general costs to CALM and other agencies of implementing the Plan would be useful. In this way, general budget requirements could be recognised and identified and strategies to obtain necessary funding could be initiated.	Considered during Plan preparation.	No <i>2d</i>

SUBMISSION COMMENTS	DISCUSSION / ACTION TAKEN	PLAN AMENDED
41. Staffing and Management <i>1 submission.</i> 1. Establish a Steering Committee to facilitate CALM coordination of the integrated interagency management approach referred to in this section.	Text amended. See Section 30 Strategy 4.	Yes <i>1d</i>
42. Funding <i>1 submission.</i> 1. Ensure the allocation of sufficient funding by CALM to ensure adequate environmental management.	Text amended to indicate a greater management commitment.	Yes <i>1c</i>
43. Plan Monitoring and Review <i>3 submissions.</i> 1. The proposals for the monitoring of these areas are inadequate. Continuing scientific monitoring of fauna, flora and water quality is essential for management purposes and should be included in the management plan. School and community groups could help with this work. 2. Insert before the first recommendation an additional recommendation - 'The specific objectives and milestones to be achieved throughout the ten year term of the plan are to be discussed, quantified, and agreed, and performance measurement criteria are to be established. (H)' 3. Recommendation 1 could read that progress toward meeting the agreed achievement milestones and the overall objectives is to be regularly reviewed. A mid-term audit of such progress is to be undertaken by an independently appointed expert.	Text amended. See Recommendations 39.3 and 39.5. Text amended. An Implementation Program is proposed to cover this. Text amended. The NPNCA and MPRA will both monitor implementation progress.	Yes <i>1e</i> Yes <i>1d</i> Yes <i>1e</i>
44. Priority Implementation <i>1 submission.</i> 1. An additional recommendation could read that specific achievement milestones and objectives are to be established for the individual recommendation priorities detailed in the plan and that these will take into account the potential contributions of such priorities to the achievement of the overall conservation objectives.	Text amended. An Implementation Program is proposed to cover this.	Yes <i>1e</i>
REFERENCES <i>1 submission.</i> 1. The reference to Dr Rose's Ph.D is incorrect. the title of his thesis is Rose, T. (1994) <i>Comparisons of the benthic and zooplankton communities in the Eutrophic Peel-Harvey and nearby Swan estuaries in southwestern Australia</i> . Ph.D. Thesis. Murdoch University 289 pp.	Text amended.	Yes <i>1e</i>

APPENDIX 1.

SUBMITTERS TO THE DRAFT MANAGEMENT PLAN

Individuals	J. Marsh S. G. Steadman W. Marsh G. D. Gadenne Dr M. Bamford N. Hodgkinson C. Minton W. Vincent Joint submission: D. G. Osborne, J. M. Osborne, N. Dunlop, J. Majer, L. Eveleigh, N. Eveleigh
Community Organisations	Maylands Ratepayers & Residents Association Wetlands Conservation Society (Inc) Metropolitan Recreational Fishing Committee
Local Government	City of Nedlands City of Melville City of South Perth
State Government	Alinta Gas Western Australian Tourism Commission Water Corporation Water and Rivers Commission - Swan River Trust Agriculture WA Fisheries WA
CALM	CALMfire

APPENDIX 2.**TOTAL NUMBER OF COMMENTS PER SECTION**

Section No.	Section Heading	No. of Comments
1	General	12
5	Tenure and Boundaries	9
6	Zoning	17
7	Interagency Responsibilities and Integrated Operations	3
10	Flora, Fauna and Habitat	1
11	Waders and other Waterbirds	4
12	Estuarine Processes and Water Quality	3
15	Rehabilitation	4
16	Non-local plants, weeds and diseases	2
17	Pets and Feral Animals	5
18	Fire	5
19	Recreation Overview	5
20	Line Fishing	2
21	Collecting	1
22	Prawning and Crabbing	14
24	Boat and Surface Water Sport	3
25	Wildlife Observation and Interaction	2
26	Day-use, Access and Nature Walks	5
29	Education	1
32	Commercial fishing	2
33	Commercial concessions	7
35	Structures, facilities and developments	1
37	Government lands and waters	5
38	Overview	1
39	Nature Conservation	1
40	Social Research	1
	Plan Implementation	3
41	Staffing and Management	2
42	Funding	1
43	Plan Monitoring and Review	3
44	Priority Implementation	1
	References	1
	Total	127