

ANALYSIS OF PUBLIC SUBMISSIONS
to the
Draft Management Plan
for
Jurabi and Bundegi Coastal Parks,
and Muiron Islands

Shire of Exmouth and the
Department of Conservation and Land Management
for the
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 Jurabi and Bundegi Coastal Parks, and Muiron Islands Draft Management Plan, 1998. Comments have been detailed to the section of the draft management plan to which they refer.

The Jurabi and Bundegi Coastal Parks, and Muiron Islands Draft Management Plan was released for public comment on 3 June 1998 for a period of two months. Late submissions were accepted. A total of 19 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.

ANALYSIS OF PUBLIC SUBMISSIONS

Method of Analysis

Public submissions were analysed according to the process depicted in the flow chart below. More specifically:

- All comments were collated according to the issue they addressed.
- Each comment was assessed using the following criteria:
 1. Changes *were* made to the 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 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 actions in the management plan were, or were not, changed and the relevant criteria used were addressed 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

A total of 19 submissions were received. The number and place of origin of substantial submissions are listed below.

	Number	Percentage
Individuals	5	26
Community	3	16
Business	3	16
State Government	7	37
Local Government	<u>1</u>	<u>5</u>
	19	100

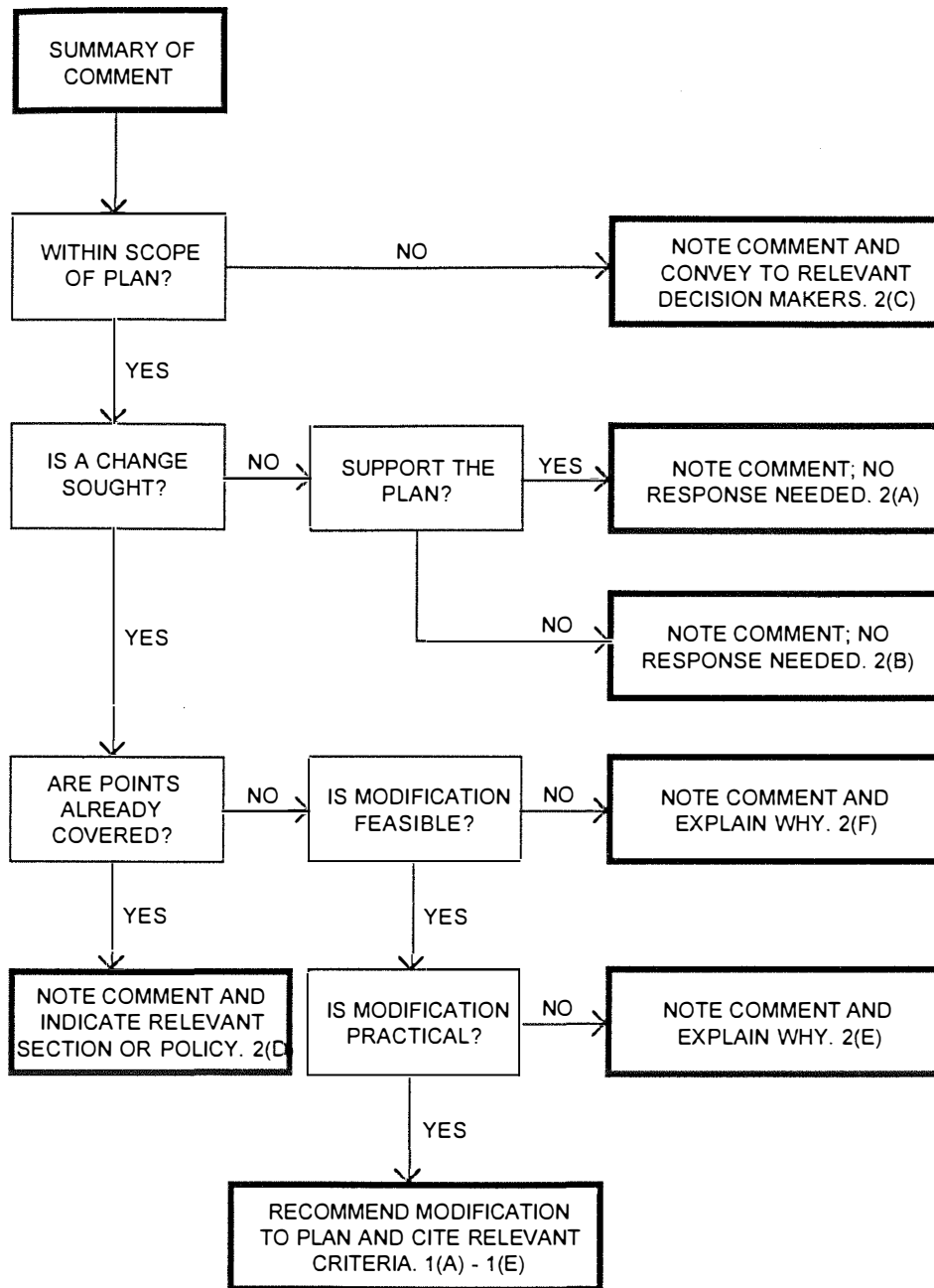
A list of the submitters to the Jurabi and Bundegi Coastal Parks, and Muiron Islands Draft Management Plan is given at the back of this analysis.

ANALYSIS TABLE

The Analysis Table contains six columns including:

- Submission Comments: a summary of each comment made on the issue paper with an indication of the number of submissions making each comment;
- Discussion/Action Taken: a discussion on why the comment did or did not result in an amendment to the issue paper, or an indication of what action was taken;
- Paper Amended: an indication whether or not the comment resulted in an amendment to the issue paper, and the criteria by which each comment was assessed.

ANALYSIS PROCESS



<i>SUBMISSION COMMENTS</i> (Number of Submissions)	<i>DISCUSSION/ACTION TAKEN</i>	<i>PLAN AMENDED</i>
General Comments <i>7 submissions.</i>		
1. The Draft plan does not make use of the many documents available relevant to the areas. For example the Karst report, EPA Conservation Reserves for Western Australia, (1975) or the Exmouth Learmonth North West Cape Structural plan. (1)	Noted. Some documents outlined were prepared/ published after the draft plan or not relevant.	NO 2c
2. Extend the Cape Range National Park to include the Jurabi Coastal Park. If the whole tip of the NW Cape was included as an extension of the Cape Range National Park, the management would be easier to administer and provide protection to this sensitive area. (1)	Boundaries set in the draft plan considered most appropriate. Joint vesting with Shire of Exmouth (Jurabi Coastal Park) and differing purpose of the reserves/national parks makes amalgamation of parks difficult.	NO 2e
3. WATC supports the general recommendations within the plan. (1)	Support for the Plan.	NO 2a
4. The draft plan does not acknowledge the considerable landscape values of this part of the North West Cape. Any structure and potential access route could have a major impact on the proposed coastal parks. Visual impact should also be carefully assessed. (1)	Additional structures and access routes are given careful consideration by the members of the planning team and specialists.	NO 2d
5. The draft plan does not acknowledge the interconnections of the terrestrial and marine environment (particularly in a Karst landscape). It does not acknowledge the potential impacts of activities and facilities sited immediately adjacent to Ningaloo Marine Park in terms of water quality and health of the reef (eg toilets should be composting) (1)	Addressed as a general requirement of the management plan.	NO 2d
6. Congratulate CALM on a first class and practical plan, one of the best. (1)	Support for the Plan.	NO 2a
7. Congratulate CALM on the depth of research and the overall plan itself. (1)	Support for the Plan.	NO 2a
INTRODUCTION 1. Background and Key Recommendations <i>2 submissions.</i>		
1. Change para: 'Jurabi Coastal Park lies on the western side of the Cape Range peninsula and west of the Yardie Creek Road extending from the northern boundary of the Cape Range National Park north to the Commonwealth land (Lyndon Location 44, Defence Purposes)' 'Bundegi Coastal Park lies on the east side of Cape Range peninsula and east of Murat Road between areas of Commonwealth land (Lyndon Location 43 and 44, Defence Purposes).' (1)	Amended.	YES 1e

SUBMISSION COMMENTS (Number of Submissions)	DISCUSSION/ACTION TAKEN	PLAN AMENDED
<p>1. Background and Key Recommendations contd</p> <p>2. Dot point 2. Recommendations:</p> <ul style="list-style-type: none"> • Have locals and tourists register for an identification tag for a small fee to allow use of tents and/or camp trailers in any selected area that is not in direct conflict with dune preservation or turtle hatcheries; • Use chemical toilets; • allow the use of an above ground open fire; and • limit dogs to camp site and beach areas. <p>(1)</p> <p>PRINCIPAL MANAGEMENT DIRECTIONS</p> <p>2. Management Arrangements <i>No submissions.</i></p> <p>3. Management Policies and Goals <i>1 submission.</i></p> <p>1. Integrate existing organisations (eg. Fisheries Department, Ocean Wise Foundation, local schools and CALM) to increase awareness amongst visitors and locals of the fragile nature of the reef and coastal strip. (1)</p> <p>4. Zoning <i>1 submission.</i></p> <p>1. Include the position of Badjarrimannos on the map. (1)</p> <p>5. Cultural Resources <i>No submissions.</i></p> <p>6. Mining and Petroleum <i>1 submission.</i></p> <p>1. The Draft plan should recommend exclusion of petroleum, mineral exploration and mining from all the proposed reserves. The proximity of the Ningaloo Marine Park and the interconnections of the karst landscape mean that the risk to Ningaloo Reef from any such exploration or mining is unacceptably high. Creation of coastal parks that exclude mining provides an ideal opportunity to create a clear buffer zone that is needed to provide adequate protection from mining and drilling operations. It would also be consistent with the government's position on excluding oil exploration and mining from Ningaloo Marine Park. The exclusion on mining is also consistent with the purpose of vesting. (1)</p> <p>7. Fire Management <i>2 submissions.</i></p> <p>1. Support the use of prescribed burning and restrictions on the use of open fires. (1)</p>	<p>Plan amended to limit camping.</p> <p>Already ongoing programs to increase visitor awareness. Noted.</p> <p>Noted.</p> <p>Beyond the scope of the plan. Government policy issue.</p> <p>Support for the Plan.</p>	<p>YES 1d</p> <p>YES 1d</p> <p>YES 1e</p> <p>NO 2f</p> <p>NO 2a</p>

SUBMISSION COMMENTS	(Number of Submissions)	DISCUSSION/ACTION TAKEN	PLAN AMENDED
7. Fire Management contd.			
2. Research is required into the fire ecology and potential impact of any proposed burning regime before using prescribed burning as a prescription. It is acknowledged in the draft plan that little is known about the ecology of fire in the area, therefore research is required prior to its consideration as a management tool. (1)		Noted.	NO 2d
JURABI AND BUNDEGI COASTAL PARKS CONSERVATION AND RECREATION			
8. Tenure Boundaries			
3 submissions.			
1. Do not support renewal of leases in the Tantabiddi area. (1)		Noted. Option in draft plan considered most appropriate.	NO 2d
2. Recommendation 2. Change 'consider' upgrading Jurabi and Bundegi from C Class to A Class to a definite commitment. (1)		Amended.	YES 1d
3. Dot point 4. Delete 'The Game Fishing and Mr G King have previously held leases' and replace with 'Two private leases were previously held.' (1)		Noted.	YES 1e
9. Geology and Landscape			
1 submission.			
1. Para 1, line 4. Replace 'south' with 'north'. (1)		Amended.	YES 1e
10. Flora and Fauna			
3 submissions.			
1. Support requirement to determine the presence of troglodytic fauna and potential impact on their population and habitat before any development commences. (1)		Support for the Plan.	NO 2a
2. Concern that the plan does not limit 'development' in the parks. Require definition of the word development in the plan and make statements opposing certain types of development in the parks. (1)		Better definition supplied.	YES 1e
3. Para 4, line 4. Replace 'troglodytic' with 'troglobitic'. (1)		Amended.	YES 1e
11. Weeds, Disease and Feral Animals			
2 submissions.			
1. Draft plan does not offer any recommendations to ensure the exclusion of stock. (1)		Amended. Recommendation to remove exotic animals from the coastal parks.	YES 1e
2. Add 'and control of domestic pets'. During the turtle nesting period it should be compulsory to keep dogs on leashes while near the beach. Beaches could be randomly policed by Rangers and information regarding pets be advertised through an education program. (1)		See Section 16. Domestic animals	NO 2d

SUBMISSION COMMENTS <i>(Number of Submissions)</i>	DISCUSSION/ACTION TAKEN	PLAN AMENDED
12. Access <i>6 submissions.</i>		
1. Concern that three more access roads may not be possible due to the unstable nature of some of the land. (1)	Plan states that additional access will be considered and must conform to the high standards in accordance with accepted design principals.	NO 2b
2. Support restriction of access as per Recommendation 1. (1)	Support for the Plan.	NO 2a
3. Map 5. Concerns about the development of accommodation at Jurabi Point, require reference in the plan. Is this lease 3116? (1)	Map amended. Location clarified. This is lease 3116.	YES 1e
4. Specify the areas where 'no vehicular traffic will be permitted off authorised access ways except in designated areas' (1)	Already covered in the Plan.	NO 2d
5. Check the legal status of the Road Reservation for Yardie Creek and Murat Roads. Concern that there is likely to be a successful Aboriginal Land Rights Claim on the Vacant Crown land at the north end of the Range. (1)	Noted. Status already known.	NO 2b
6. Recommendation 1. Suggest: 4WD will defy this and make additional tracks running parallel to the original access therefore recommend making the following tracks gravel access 1.4km south of Bouden, track immediately after the shire sand pit access and the track south of the previous access. (1)	Plan states that additional access will be considered and must conform to the high standards in accordance with accepted design principals.	NO 2b
13. Signs and Day-Use Facilities <i>1 submission.</i>		
1. Insufficient commitment to design for visual amenity and to use of materials compatible with the environment. (1)	Plan outlines the design of environmentally sensitive facilities.	NO 2b
14. Camping <i>4 submissions.</i>		
1. Consider a restriction on the numbers camping on the beach at one time. (1)	Camping section modified.	YES 1d
2. Further consideration is required regarding camping in the Jurabi Coastal Park re petition from Exmouth residents. (1)	Informal camping will be permitted for a maximum of three days.	YES 1b
3. Insufficient information on 'overnight stays on the beach for fishing in defined areas'. Areas need to be defined (1)	Noted. Plan amended to allow for designated areas in relation to beach camping.	YES 1e

SUBMISSION COMMENTS	(Number of Submissions)	DISCUSSION/ACTION TAKEN	PLAN AMENDED
14. Camping contd.			
4. Concern that extended camping will no longer be allowed. Suggest the introduction of a sticker or token system allowing registered users (by remission of a small fee) to camp at particular locations. This would be under the proviso that all rubbish is removed, monies collected go towards maintaining the area and authorities know the number of people in the area at all times. (1)		Management of camping within the coastal parks has been updated to allow for informal camping on a limited periods of stay basis.	YES 1d
15. Open Fires			
No submissions.			
16. Domestic Animals			
3 submissions.			
1. Strongly object to allowing cats into the coastal parks. Ban cats from all reserves as their presence is incompatible with conservation of fauna. (1)		Cats are not permitted in either of the coastal parks of the Muiron Islands.	YES 1d
2. Ensure that dogs are on leashes at all times to minimise impact on the parks. (1)		Covered by the Dog Act which states that dogs must be kept under control. This does not necessarily indicate physical restraint.	NO 2b
3. Add Recommendation 4; 'Pass Council By-Law to ensure that dogs are to be leashed while on beaches between the months of October to January each year. (1)		Covered by the Dog Act which states that dogs must be kept under control. This does not necessarily indicate physical restraint.	NO 2e
17. Recreational Riding			
1 submission.			
1. Concern about impact of horses and camels on the parks. Require strict hygiene controls as part of the licence conditions. (1)		Noted.	YES 1d
18. Shooting and Carrying Firearms			
No submissions.			
MUIRON ISLANDS CONSERVATION AND RECREATION			
19. Tenure, Boundaries			
4 submissions.			
1. Upgrade tenure to A Class and require a commitment in the plan to such upgrading. (1)		Noted.	YES 1d
2. Support the change from Class C to Class A reserve. The waters around the islands should also be vested at least as a Marine Nature Reserve as recommended by <i>The Report of the Marine Parks and reserves selection Working Group, (CALM 1994)</i> . (1)		Option in plan considered most appropriate.	NO 2d
3. Urge the proponents of the draft plant to take the recommendations from <i>The Report of the Marine Parks and reserves selection Working Group, (CALM 1994)</i> . Especially in regards to the possible overfishing in the waters surrounding the Muiron Islands (Wilson Report) (1)		Noted. Water is outside the boundary of the parks.	NO 2c

SUBMISSION COMMENTS <i>(Number of Submissions)</i>	DISCUSSION/ACTION TAKEN	PLAN AMENDED
19. Tenure, Boundaries contd. 4. For the successful management of the island environments and their fauna populations, (birds and turtles) it is essential that the surrounding waters are protected as well as the land. (1)	Noted. Water is outside the boundary of the parks.	NO 2c
20. Flora and Fauna <i>No submissions.</i>		
21. Weeds, Disease and Feral Animals <i>No submissions.</i>		
22. Access <i>No submissions.</i>		
23. Signs and Day-Use Facilities <i>1 submission.</i> 1. Strongly believe the islands should be day based only. (1)	Noted. Option in plan considered most appropriate.	NO 2e
24. Camping <i>1 submission.</i> 1. Totally oppose permitting camping on the islands due to the very fragile environment and recognition in the RAMSAR agreement as an area of international importance for migratory birds as well as being an important breeding ground for turtles. (1)	Noted.	NO 2d
25. Open Fires <i>1 submission.</i> 1. Fully support the recommendation to ban fires as the risk to flora and fauna is unacceptable. However, this would be very difficult to control unless camping is banned on the islands. (1)	Support for the Plan.	NO 2a
26. Domestic Animals <i>1 submission.</i> 1. Clearly state the recommendation that no domestic animals be allowed on the Muiron Islands. (1)	Domestic animals such as dogs and cats are not permitted in nature reserves.	YES 1e/d
27. Shooting and Carrying Firearms <i>No submissions.</i>		
COMMUNITY RELATIONS 28. Information, Interpretation and Education <i>1 submission.</i> 1. WATC supports the development of a visitor facility, with particular emphasis on the local turtle population and breeding areas. (1)	Support for the Plan.	NO 2a
29. Community Involvement <i>No submissions.</i>		
COMMERCIAL USES 30. Commercial Concessions <i>2 submissions.</i>		

SUBMISSION COMMENTS <i>(Number of Submissions)</i>	DISCUSSION/ACTION TAKEN	PLAN AMENDED
1. Strengthen the phrasing of the recommendation on the development of car parks, as this must be on represented and environmentally sustainable land systems. (1)	Amended.	YES ld
2. Oppose any concession to commercial operators to create facilities on the Muiron Islands. Any permanent structure on the island would be totally inappropriate due to the impact of waste, visual considerations and the compromising of conservation values to meet commercial demands. (1)	Noted.	YES ld
KNOWLEDGE 31. Research and Monitoring <i>No submissions.</i>		
PLAN IMPLEMENTATION 32 Funding and Management <i>No submissions.</i>		
33. Evaluation and Review <i>No submissions.</i>		
REFERENCES <i>No submissions.</i>		

APPENDIX 1.

SUBMITTERS TO THE DRAFT MANAGEMENT PLAN

Individuals	M.J. De La Mare I. Giles J. Cooper M. Boyden M. Fleay
Community Organisations	Heritage Council of WA Recfishwest Ningaloo Action Group Conservation Council of WA
State Government	WA Maritime Museum Aboriginal Affairs Department Water and Rivers Commission WA Tourism Commission Bush Fires Service of WA
Local Government	Shire of Exmouth

APPENDIX 2.

TOTAL NUMBER OF COMMENTS PER SECTION

Section No. and Title	No. of Comments
General	7
Introduction	
1. Background and Key Recommendations	2
Principal Management Directions	
2. Management Arrangements	0
3. Management Policies and Goals	1
4. Zoning	1
5. Cultural Resources	0
6. Mining and Petroleum	1
7. Fire Management	2
Conservation and Recreation	
<i>Jurabi and Bundegi Coastal Parks</i>	
8. Tenure and Boundaries	3
9. Geology and Landscape	1
10. Flora and Fauna	3
11. Weeds, Disease and Feral Animals	2
12. Access	6
13. Signs and Day-use Facilities	1
14. Camping	4
15. Open Fires	0
16. Domestic Animals	3
17. Recreational Riding	1
18. Shooting and Carrying Firearms	0
<i>Muiron Islands</i>	
19. Tenure and Boundaries	4
20. Flora and Fauna	0
21. Weeds, Disease and Feral Animals	0
22. Access	0
23. Signs and Day-use Facilities	1
24. Camping	1
25. Open Fires	1
26. Domestic Animals	1
27. Shooting and Carrying Firearms	0
Community Relations	
28. Information, Interpretation and Education	1
29. Community Involvement	0
Commercial Uses	
30. Commercial Concessions	2
Knowledge	
31. Research and Monitoring	0
Plan Implementation	
32. Funding and Management	0
33. Evaluation and Review	0
Total	43