

PROPOSED ST JOHN BROOK AND JARRAHWOOD CONSERVATION PARKS

Analysis of Public
Submissions

to the
Draft Management Plan

Department of Conservation and Land Management
for the
Conservation Commission of Western Australia
October 2005

CONTENTS

BACKGROUND:	3
Analysis of Public Submissions.....	3
Method of Analysis.....	3
Analysis Process.....	4
GENERAL COMMENTS.....	5
PART A: INTRODUCTION.....	7
Planning Area.....	7
Key Values.....	8
PART B: MANAGEMENT DIRECTIONS AND PURPOSE.....	8
Vision.....	8
Management Arrangements with Aboriginal People.....	9
Legislative Framework.....	9
PART C: MANAGING THE NATURAL ENVIRONMENT.....	11
Biogeography.....	11
Geology, Geomorphology and Landscape.....	11
Soil and Catchment Protection.....	11
Native Plants and Plant Communities.....	16
Native Animals and Habitats.....	16
Environmental Weeds.....	19
Introduced Problem Animals.....	20
Disease.....	22
Fire.....	22
PART D: MANAGING OUR CULTURAL HERITAGE.....	27
Indigenous Heritage.....	27
Non-Indigenous Heritage.....	28
PART E: MANAGING RECREATION AND TOURISM.....	28
Visitor Use and Opportunities.....	28
Visitor Access.....	32
Tourism and Commercial Operations.....	34
PART F: MANAGING SUSTAINABLE RESOURCE USE.....	34
Petroleum Exploration and Production.....	34
Beekeeping.....	35
PART G: INVOLVING THE COMMUNITY.....	35
Information, Education and Interpretation.....	35
Monitoring and Implementing the Plan.....	36
PERSONAL COMMUNICATIONS.....	36
REFERENCES.....	36
APPENDIX 1.....	37
Submitters to the Plan	

BACKGROUND

This document is an analysis of public submissions to the Proposed St John Brook and Jarrahwood Conservation Parks Draft Management Plan 2004 (the Plan).

The Plan was released for public comment on 4 January 2005 for a period of two months. Late submissions were accepted. A total of 32 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 two issues of the local newspapers and two issues of The West Australian, advising that the Plan was available for comment (Appendix 1). The Plan was distributed to State Government departments, tertiary institutions, recreation and conservation groups, local authorities, libraries and other community groups and individuals who expressed interest during the preparation of the draft. The Plan was available for viewing and/or downloading from the Department of Conservation and Land Management's (CALM) NatureBase website, from which electronic submissions could be made. Printed copies of the Plan were made available at CALM's offices in Kensington, Busselton, Bunbury and Nannup, and could be inspected at CALM libraries at Woodvale, Kensington and Bunbury, and the libraries and municipal office of the Shire of Nannup.

Analysis of Public Submissions

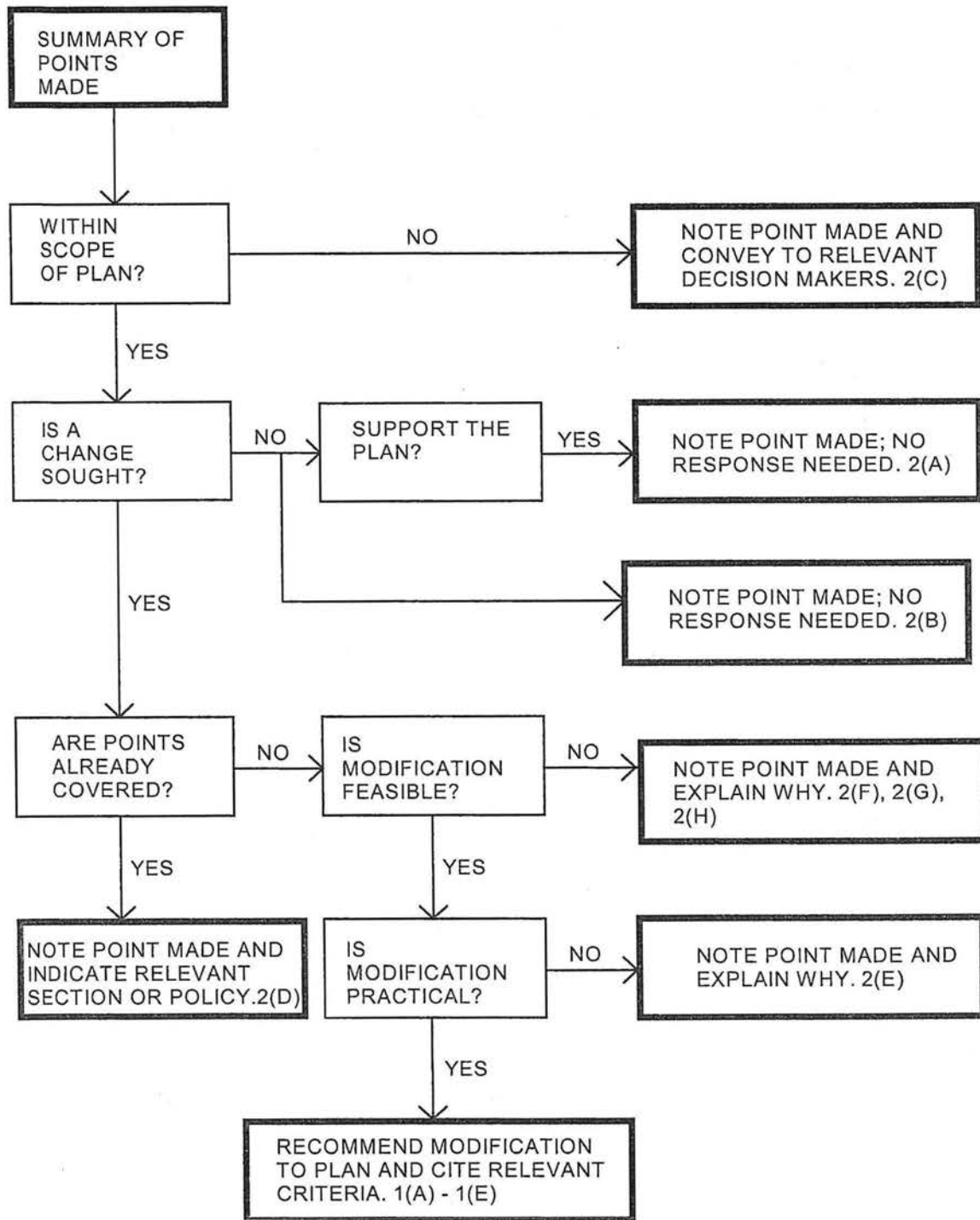
Method of Analysis

The public submissions to the Plan were analysed by the planning team according to the process depicted in the flow chart overleaf. More specifically:

- ❖ The points made in each submission were collated according to the section of the Plan they addressed.
- ❖ Each point made was assessed using the following criteria:
 1. The Plan *was amended* if the point:
 - (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 Plan *was not amended* if the point:
 - (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) was 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 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);
 - (g) was unclear; or
 - (h) involved details that are not necessary or appropriate for inclusion in a document aimed at providing management direction over the long term.
- ❖ The reasons why recommendations in the 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.

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 that would give cause to elevate the importance of any submission above another.

Analysis Process



ANALYSIS OF PUBLIC SUBMISSIONS
PROPOSED ST JOHN BROOK AND JARRAHWOOD CONSERVATION PARKS
DRAFT MANAGEMENT PLAN 2004

Comment No.	No. of Submissions	SUMMARY OF COMMENT <i>(submitter number)</i>	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
1	1	General Comments The Plan appears to cover all the major issues in a comprehensive and well considered way. (6)	Noted.	No	2(a)
2	1	Prior to the determination of the final management plan, an inspection of the Parks by community stakeholders, CALM and the Conservation Commission of Western Australia is requested. (16)	Noted.	No	2(c)
3	1	We welcome the inclusion in the Plan of objectives, strategies and key performance indicators that have performance measures, targets, reporting requirements and timelines. (21)	Noted.	No	2(a)
4	1	We are pleased to note that the Plan avoids discretionary language and provisions that require CALM to merely 'have regard'. (21)	Noted.	No	2(a)
5	1	I am against the proposed St John Brook and Jarrahwood Conservation Parks. You have effectively locked away a lot of good timber country. (28)	Noted, although the purpose of creating the Parks is to assist in the establishment of a comprehensive, adequate and representative conservation reserve system in the Jarrah Forest bioregion.	No	2(e)
6	1	The Plan looks like an unnecessarily expensive production for a draft document and should be made as inexpensive as possible. (21)	Noted.	No	2(c)

Comment No.	No. of Submissions	SUMMARY OF COMMENT <i>(submitter number)</i>	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
7	1	The font and maps in the Plan is too small to read. (21)	The font size and maps meet Australian standards. However, the font size will be increased slightly to make the Plan more readable. The maps are considered an appropriate size for the document.	Yes	1(b)
8	1	A single map at a readable scale is preferable to two small maps that are hard to read. (21)	Two maps need to be provided as they focus on different areas of management. If combined, the maps would become cluttered and less readable.	No	2(c)
9	1	The maps are not accurate at the northern end of the Park. Tracks should be included where they exist. (4)	The maps only include public access. Tracks not indicated on the maps are either management only or designated to be closed and rehabilitated (see <i>Visitor Access</i>).	No	2(d)
10	1	Specific budget allocations and time frames should also be set to meet objectives of the Plan. (11)	Specific budget allocations may vary over the life of the Plan according to CALM's Regional priorities. Therefore they are not included in the Plan.	No	2(f)
11	1	Alinta Gas have no network assets or proposed works in the area. (33)	Noted.	No	2(b)
12	1	Telstra have major assets in the vicinity of the Parks. The location of assets can be provided by the dial before you dig service. (34)	Noted.	No	2(h)
13	1	Telstra note that emergency maintenance of the network may require vehicular access. (34)	Noted.	No	2(h)
14	1	Telstra wishes to retain its statutory rights over its assets within the proposed park boundaries. (34)	Noted.	No	2(h)
15	1	Western Power would like to continue current vegetation maintenance along power lines and their associated infrastructure. (36)	Noted, but is generally considered at an operation level rather than strategic documents such as management plans.	No	2(h)

Comment No.	No. of Submissions	SUMMARY OF COMMENT <i>(submitter number)</i>	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
16	1	Western Power wish to highlight and confirm their need to maintain management zones along power lines and their associated infrastructure, both within and immediately adjacent to the land indicated in the Plan. (36)	Noted, and provided for in the management Plan.	No	2(h)
17	1	Building restrictions may apply to any construction close to power lines. (36)	Noted, but is generally considered at an operation level rather than strategic documents such as management plans.	No	2(h)
18	1	PART A: INTRODUCTION Planning Area We would like to inspect the areas proposed to be added to the Parks with CALM and the Conservation Commission. (21)	Beyond the scope of the Plan.	No	2(c)
19	2	Pending inspection, we support the proposed additions and excisions from the Parks. (21) (22)	Noted.	No	2(a)
20	1	We are concerned about the proposed excision of an area on south-west boundary. (21)	Noted, although reasoning for the concern was not given.	No	2(b)
21	3	The proposal to add a portion of State forest to the northern boundary of the proposed St John Brook Conservation Park is supported. (11) (16) (30)	Noted.	No	2(a)
22	1	There should be no loss of vegetation or vegetation in good ecological condition when modifying park boundaries. (20)	Park boundaries have been designed to balance the net loss of vegetation with net gains in other areas. Some forest omitted from the Parks is contained in informal reserves, which seek to conserve biodiversity outside of the formal reserve system.	No	2(d)
23	2	Reserving a wider section of forest in the northern section of the Parks should be considered. (12) (16)	Park boundaries have been designed to balance the net loss of vegetation with net gains in other areas.	No	2(d)

Comment No.	No. of Submissions	SUMMARY OF COMMENT <i>(submitter number)</i>	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
24	1	To ensure compatible management with adjoining lands, there must be a wide buffer in multiple use State forest adjacent to the Parks where there are no log landings or gravel pits and where no intensive logging is allowed. Adjoining State forest should be monitored to ensure its compatibility with the Parks. This should be included as a key performance indicator. (21)	It is stated in the section on <i>Planning Area</i> that compatible management of adjoining lands is essential to the management of the Parks. This will be undertaken in accordance with the <i>Forest Management Plan 2004-2013</i> .	No	2(a)
25	1	Vasse Highway is a road under the care, control and management of the Commission of Main Roads. There are currently no plans to widen the existing road reserve, and therefore Main Roads has no objection to the proposed change in tenure from State forest to conservation park. Should widening of the road be required in the future the land will be acquired from the conservation park in accordance with the provisions of the Land Administration Act 1997. (35)	Noted and boundaries of the Parks are to remain as proposed in the Plan.	No	2(a)
26	1	Key Values We support the key values of conservation, culture and recreation. (30)	Noted.	No	2(a)
27	1	We propose adding to the <i>Key Values</i> the following point: 'freshwater purity input to the Blackwood River'. (11)	The point is noted and reworded to include as a key value.	Yes	1(d)
28	1	The opening remark in <i>Key Values</i> refers to 'maintaining or enhancing the key values of the Parks'. We suggest that maintaining is not good enough and the focus must be to enhance or improve key values. (11)	Enhancing key values is stated as an objective in the Plan. Where the desired condition is already met, 'maintaining key values' is an appropriate statement.	No	2(a)
		PART B: MANAGEMENT DIRECTIONS AND PURPOSE Vision			
29	1	We support the addition to the vision of a measurable improvement to the water quality, habitats, flora and fauna of the Parks by 2014. (11)	Water quality is added to the vision. The Plan states that the Parks' condition will be 'the same or better than in 2004'.	Yes	1(e)
30	2	We support the vision for the St John Brook and Jarrahwood conservation parks as outlined in the Plan. (8) (30)	Noted.	No	2(a)

Comment No.	No. of Submissions	SUMMARY OF COMMENT <i>(submitter number)</i>	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
31	3	Management Arrangements with Aboriginal People We support the concept of appropriate and meaningful involvement of indigenous people in the management of conservation lands. (13) (20) (21)	Noted.	No	2(a)
32	1	We have been unable to obtain a copy of the Memorandum of Understanding between CALM and the South West Aboriginal Land and Sea Council and are unable to comment on whether the practical consequences for the mineral resources sector have been properly considered. (13)	Noted.	No	2(b)
33	3	Legislative Framework Support the proposed changes to tenure and purpose within two years. (11) (12) (22)	Noted.	No	2(a)
34	1	We support the change in tenure of Cambray Siding Railway Line and Cambray Siding to conservation park. (21)	Noted.	No	2(a)
35	4	Support the acquisition of adjacent private properties as and when they become available. (11) (20) (21) (22)	Noted.	No	2(a)
36	1	By consolidating private property into the Parks, does that mean that government departments are going to have a say in what the landowner can do or can not do on their property? (28)	CALM does not manage private property.	No	2(c)
37	1	Will the acquisition of private property to be consolidated into the Parks be a forceful acquisition and would adequate compensation be made available? (7)	The acquisition of private property will not be 'forceful' and would only occur if the property was made available for purchase.	No	2(h)
38	1	We do not intend, and have no wish to sell our property, either freehold or for addition to the Parks. There is no intention to commence any form of commercial enterprise, agriculture or viticulture, or to clear or any way interfere with our 90 acres of native bushland. (10)	Noted.	No	2(b)

Comment No.	No. of Submissions	SUMMARY OF COMMENT <i>(submitter number)</i>	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
39	1	Adjoining private property has not contributed to any significant decline in water quality or caused environmental degradation of the Parks and, as such, I see little value in the land being consolidated into the Parks. Meaningful dialogue with private landholders regarding the management of the Parks would be more appropriate to their management than acquiring private lands. (4)	Noted. CALM will consider acquiring adjoining lands and adding them to the Parks only when they become available and subject to an assessment of their values. Where this does not occur CALM will continue to operate in accordance with the proposed <i>Good Neighbour Policy</i> (subject to final consultation).	Yes	1(e)
40	2	We use the old railway bridge adjacent to Nelson Location 6881 to access our properties. If the railway reserve is transferred for management by CALM, and the bridge is closed to vehicular access, the approaches to the ford across St John Brook immediately upstream from the bridge should be upgraded and the bridge adequately maintained. (4) (10)	The Transit Authority does not permit motor vehicle access across the bridge. This will continue if CALM acquires management of this land due to the safety risk and considerable cost to upgrade and maintain the bridge for motor vehicle access. Access to the ford will not be upgraded.	Yes	1(e)
41	1	I see little value in both CALM and private land owners maintaining fire breaks along common boundaries. I recommend that CALM negotiate with private land owners and the Shire of Nannup for joint firebreaks to reduce the amount of clearing. (4)	CALM will work with neighbours wherever possible to establish joint firebreaks that minimise overall clearing width on CALM-managed lands or private estate.	Yes	1(b)
42	1	The classification of the proposed Jarrahwood Conservation Park from Class C to Class A may obstruct access to any future resource projects in this area. An alternative classification as Forest Conservation Area is offered. (13)	Noted but considered in the Forest Management Plan 2004-2013 to classify the area as conservation park.		
43	1	It is remarkable that adequate surveys to establish whether or not rare fauna habitat exists have not been conducted since the proposed St John Brook Conservation Park was identified as a management priority area in 1977. (21)	With the resources available, CALM has conducted fauna surveys as part of the Western Shield program (see <i>Native animals and Habitats</i>). This has identified specially protected fauna and priority fauna in the Parks. Other surveys of both flora and fauna have been undertaken by Murdoch University.	No	2 (d)

Comment No.	No. of Submissions	SUMMARY OF COMMENT <i>(submitter number)</i>	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
44	2	PART C: MANAGING THE NATURAL ENVIRONMENT Biogeography The proposed increase in reservation of the Jarrah Forest bioregion is noted and welcomed. It is however, still inadequate. (20) (21)	Noted.	No	2(b)
45	1	Bioregional mapping may not be the best guide to species richness. More recent mapping using different parameters by Professor Stephen Hopper is revealing species richness in areas where it was not previously anticipated. A paper by Gioia and Pigott introduces a new area, the Blackwood Plateau, for consideration as a conservation reserve with high species richness. (21)	The division of Australia into bioregions is intended to provide the framework for developing a comprehensive, adequate and representative reserve system rather than be an indication of biodiversity alone. The reference to the Blackwood Plateau as an area with high species richness is included in the Plan.	Yes	1(a)
46	1	Geology, Geomorphology and Landscape Suggested text on the geology of the Parks. (23)	Text included in the Plan.	Yes	1(a)
47	1	Soil and Catchment Protection Specific text supplied regarding the significance of St John Brook as a potential water supply, the history behind its assessment, current proposals by the Water Corporation and the process for approving this proposal. The following recommendations were made: (1) Specific provision is made in the Plan for the extraction of water from the proposed St John Brook Conservation Park. (2) The current text of the <i>Soil and Catchment Protection</i> section of the Plan be revised based on the information provided. (26)	A summary of the text provided has been included in the Plan. The Plan provides a process by which water could be taken from the Parks if approved by the relevant authorities following due consideration of the Parks values.	Yes	1(a)
48	1	Under the <i>Water Agencies (Powers) Act 1984</i> the Water Corporation is required to acquire the land, estate or interest it considers is needed for major works. Water Corporation would prefer the land under the proposed dam and reservoir to be excised from the proposed St John Brook Conservation Park and vested with the Corporation before the reserve boundaries are set. (29)	This is one option that may be considered over the life of the Plan. A permit issued by CALM would also classify as an 'interest' that is needed to undertake major works.	Yes	1(a)

Comment No.	No. of Submissions	SUMMARY OF COMMENT <i>(submitter number)</i>	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
49	1	The location of the proposed St John Brook Reservoir and conceptual pipe route should be shown on maps within the Plan so that it may be considered in the reserve's management. (29)	The location of a proposed reservoir has been indicated on maps within the Plan.	Yes	1(a)
50	1	Location of the proposed pipehead dam is further upstream from the confluence of Blackwood and St John Brook than described (6.5 km rather than 0.5 km). (29)	Noted and new information incorporated into the Plan.	Yes	1(a)
51	1	Information on water extraction should be addressed under <i>Part F: Managing Sustainable Resource</i> rather than in the section on <i>Soil and Catchment Protection</i> . (29)	Noted and a separate section created under <i>Part F Managing Resource Use</i> .	Yes	1(d)
52	7	There should be no water extraction from the Parks, including dams on St John Brook. (8) (11) (17) (20) (21) (22) (28)	Noted and considered in <i>Part C Soil and Catchment Protection</i> where the environmental impacts are stated.	No	2(d)
53	2	Any proposal to dam St John Brook for the purpose of surface water extraction would be a serious concern. (12) (16)	Noted and considered in <i>Part C Soil and Catchment Protection</i> where the environmental impacts are stated.	No	2(d)
54	1	If St John Brook is dammed, what would be the environmental impact and how would such impacts be managed? (7)	Possible impacts are stated in <i>Part C Soil and Catchment Protection</i> .	No	2(d)
55	1	The strategy for minimising soil erosion and protecting water quality and quantity should read 'opposing and asking the EPA to oppose any land clearing and water extraction within the catchment and the issuing of permits for extraction of water from the parks or dam construction on St John Brook or its tributaries'. (21)	Some water extraction already exists within the catchment and may be acceptable if controlled. Where extraction may have adverse impacts on the Parks, the process is to refer proposals to the Environmental Protection Authority for further assessment. Strategies in the Plan are considered appropriate.	No	2(d)
56	1	The Blackwood River suffers from salinity and becomes fresher towards the coast. Extraction of freshwater that constitutes an increase in salinity should not be permitted. (20)	Noted and comment will be referred to the relevant management authority.	No	2(a)

Comment No.	No. of Submissions	SUMMARY OF COMMENT <i>(submitter number)</i>	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
57	1	We urge that consideration be given to a formal system for taking surface water from St John Brook that would (a) monitor amounts taken and (b) in time, consider whether it becomes necessary to license or regulate amounts taken. (11)	The proposal from the Water Corporation to extract water from St John Brook should trigger the need to proclaim the surface water catchment. A licence is need from the Department of Environment to extract water from proclaimed areas. A CALM Act water removal permit is required from CALM to extract water. Monitoring of water quality will be undertaken.	Yes	1(e)
58	1	St John Brook is maintained by groundwater discharge primarily from the Leederville aquifer, with a local component of upward leakage from the Yarragadee aquifer near Barrabup Pool. Regionally there is generally a downward leakage from the Leederville to Yarragadee aquifer. (26)	Information incorporated into the Plan.	Yes	1(a)
59	1	The superficial aquifer is restricted to the coastal plains and is not present within the proposed parks. (26)	Noted. The Plan has been changed so that the statement is no longer relevant.	Yes	1(a)
60	1	There is a comment about the estimate for sustainable yield from the Yarragadee aquifer and given the ongoing work on this aquifer, it would be better to remove the last half of the sentence. (29)	Sentence removed accordingly.	Yes	1(a)
61	1	The current sustainable yield for the Blackwood Groundwater Area is 90 GL/yr. (26)	Noted but not included in the Plan as the yields are being reassessed.	No	2(b)
62	1	On line eight, second paragraph, page 10 this sentence should finish where there was a comma to read 'The Yarragadee aquifer is the most significant aquifer for water supply'. (29)	This statement has been deleted. Given that the Yarragadee aquifer is the only aquifer proposed for extraction, it can be assumed that it is the most significant for water supply.	Yes	1(e)

Comment No.	No. of Submissions	SUMMARY OF COMMENT <i>(submitter number)</i>	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
63	1	Will agricultural property owners in the Cundinup region, or other surrounding regions, be unable to change farming practices in line with more intensive agricultural pursuits or be required to pay for monitoring or catchment management initiatives? (7)	CALM has no management responsibility for private property. However, CALM may liaise with landholders to encourage the protection of water quality and the adoption of best land use practices.	No	2(h)
64	1	How will the proposed new conservation parks affect new applications for irrigation from the catchment and would any such applications be viewed negatively as a result? There is some concern that conservation values will override the economic factors is assessing applications. (7)	Applications for irrigation within the catchment are assessed by the Department of Environment not CALM. However, CALM will liaise with the Department of Environment to ensure that conservation values are protected.	No	2(h)
65	1	Will private landholders have to prove at their cost that any water extraction will not adversely affect the values of the Parks? (7)	Beyond the scope of the Plan.	No	2(h)
66	1	Is it likely that the development authority (Shire of Nannup) will be dictated to for future land use planning and proposals in the catchment area and what developments will/will not be permitted? (7)	CALM will seek to work with the Shire of Nannup regarding land use proposals. However, proposals on lands outside the Parks, which may adversely affect the Parks, may be referred to the Environmental Protection Authority.	No	2(h)
67	3	We support the proposal for CALM to liaise with developers, Nannup Shire, the Western Australian Planning Commission, other agencies and local landholders to improve better catchment management. (11) (16) (20)	Noted. The statement has been deleted from the text and retained as a strategy in the summary table. Timeframes have been reviewed to incorporate annual monitoring.	Yes	1(d)
68	1	CALM should liaise with stakeholders to implement better catchment management by testing annually, as routine, not 'where required'. (11)	Liaison with stakeholders will occur where required. Monitoring of water quality, as a means of assessing impacts on the Parks, will be undertaken annually.	Yes	1(e)
69	2	The presence of feedlots in the upper catchment is of particular concern. (11) (20)	Noted.	No	2(g)

Comment No.	No. of Submissions	SUMMARY OF COMMENT <i>(submitter number)</i>	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
70	2	Farming practices upstream from the Parks, including feedlots, are currently contributing to a decline in the water quality of St John Brook. (4) (11)	Monitoring of water quality is proposed in the Plan (see Part C <i>Soil and Catchment Protection</i>).	No	2(d)
71	1	There should be more monitoring of local feed lot run-off. (27)	Noted and considered in Part C <i>Soil and Catchment Protection</i> .	No	2(d)
72	1	No mention is made of monitoring for turbidity, this should be included. (20)	Monitoring of turbidity could be incorporated into monitoring of water quality, which is proposed (see Part C <i>Soil and Catchment Protection</i>).	No	2(d)
73	1	Monitoring should be frequent and reporting should be less than every five years. (16)	Noted and Plan amended accordingly.	Yes	1(d)
74	1	Will agricultural property owners in the Cundinup or other surrounding regions be required to pay for increased monitoring or catchment management initiatives? (7)	Beyond the scope of the Plan.	No	2(c)
75	1	A drain running into St John Brook indicates that the clay pan adjacent to Brook Road was a swamp at one time. CALM could block the drain to re-establish the swamp. (31)	The clay pan may be naturally ephemeral in nature. There is no indication that human intervention would increase biodiversity.	No	2(h)
76	1	We oppose any land clearing within the catchment. (21)	Noted but beyond the scope of this Plan.	No	2(d)
77	1	A lot of new tracks are made or remade at the time of marron season and as people fish out of season, the tracks are always open, not rehabilitated. (28)	Marroning and fishing trails will be consolidated into a single trail with appropriate Brook access points. Unnecessary trails will be rehabilitated.	Yes	1(b)
78	1	The assignment of a water source for public water supply purposes outside the metropolitan Water Sewerage and Drainage Area triggers considerations of the CAWS Act and related by-laws. (35)	Noted and reference to the CAWS Act and its by-laws is included in the Plan.	Yes	1(a)

Comment No.	No. of Submissions	SUMMARY OF COMMENT <i>(submitter number)</i>	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
79	1	Given the proposed pipehead development, it is recommended that best management practices for public water supply sources be applied. The Department of Environments Statewide Policy 13 <i>"Policy and Guidelines for Recreation within Public Drinking Water Source Areas on Crown land"</i> provides guidance for recreation developments. Under this policy, Cambray Siding should be considered a 'Proposed P1 PDWSA'. The Sleeper Hower's camp would not be recommended in a potential reservoir protection zone. The Old Timberline Trail would be supported in such a zone subject to no infrastructure being proposed along its alignment in the potential reservoir protection zone. (35)	Reference is made in the Plan to CALM's obligations to protect water quality and its requirements under the DoE's Statewide Policy 13 <i>Policy and Guidelines for Recreation within Public Drinking Water Source Areas on Crown land</i> . Also noted in the Plan are the implications of a potential reservoir protection zone should the pipehead development be approved.	Yes	1(a)
80	1	Native Plants and Plant Communities Scientific evidence suggests that there may be no loss of plant species even if fires are 150 years apart. Therefore, CALM should name the species that are impacted upon by infrequent fires and what it means by 'infrequent'. The performance measure should be 'Change in the number of indigenous plant species' and the target 'No loss of indigenous plant species'. Reporting should occur every seven years. (21)	The scientific evidence is not cited. The Plan considers species that are sensitive to fire, not just from 'infrequent' fire and proposes strategies of how this is incorporated into the planning process. Therefore the text is deemed appropriate. It is not necessary in a management plan to indicate all fire sensitive species. CALM does not have the resources to survey and then monitor the number of species within the Parks. Rather, survey and monitoring effort is focused on fire sensitive ecosystems and indicator species. Performance indicators have been included in the Plan.	Yes	1(e)
81	1	Flora surveys should be undertaken for the Parks. (17)	Surveys have been undertaken previously.	No	2(d)
82	1	Native Animals and Habitats Quokka, common brushtail possum, chuditch and woylies have been recorded in the Parks. It is of vital importance that their habitat is maintained. (16)	Noted, although quokka have not been recorded in the Parks.	No	2(a)

Comment No.	No. of Submissions	SUMMARY OF COMMENT <i>(submitter number)</i>	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
83	1	Increased monitoring of mammal populations is highly desirable, and an excellent way to motivate and involve the local community in park management. (20)	Monitoring is undertaken as part of the Western Shield program and will be continued over the life of the Plan.	Yes	1(e)
84	1	The unusual richness of the mammal fauna should be sufficient justification for a highly protective approach to this area. (20)	Noted.	No	2(a)
85	1	An objective should be 'To ascertain the presence or absence of specially protected and priority fauna' to be achieved by 'conducting specifically targeted surveys for specially protected and priority fauna'. (21)	Part of the objective to protect native fauna and their habitats, which is stated in the Plan, involves ascertaining the presence or absence of specially protected and priority fauna.	No	2(a)
86	2	Fauna surveys should be conducted within five years. (17) (21)	Various fauna surveys have been undertaken previously.	No	2(a)
87	1	The Parks are too small to maintain viable populations of black-cockatoos'. Management of surrounding State forest to ensure these birds are able to persist will be essential. (20)	It is stated in the section on <i>Planning Area</i> that compatible management of adjoining lands is essential to the management of the Parks.	Yes	1(e)
88	1	Inappropriate fire regimes are identified as a threatening process to fauna habitat. We suggest an additional strategy to address this issue: 'use fire to protect and regenerate fauna habitat' (2)	Noted and included in the Plan.	No	2(b)
89	1	Marron is a unique species of aquatic life and this should be stated (28)	The issues relating to marron stocks in the south-west have been stated.	Yes	1(e)
90	2	The Plan does not identify any aquatic species as being either 'threatened' or 'priority' species. (24) (32)	Noted.	No	2(b)

Comment No.	No. of Submissions	SUMMARY OF COMMENT <i>(submitter number)</i>	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
91	3	The Plan fails to reference any surveys or studies into the aquatic fauna of St John Brook. (24) (25) (32)	Rather than serve as a reference document, the Plan aims to identify issues for management and strategies to address these issues. It is not necessary to make reference to surveys or studies if they are not linked to management issues.	No	2(h)
92	3	Management plan does not list the four native fish species that occur in St John Brook nor the range of their distribution. (24) (25) (32)	It is not necessary to list the four native fish species that have been recorded in St John Brook unless they are considered specially protected or Priority species. Of more importance is the significance of the Brook for their conservation and the level of threat posed to these species.	No	2(h)
93	4	A quantitative assessment of the current population status and any level of threat posed to the native fish species of St John Brook is essential before any statements regarding the impact of non-native fish species such as trout can be made. (24) (25) (31) (33)	The impacts of non-native fish species such as trout are well documented and can be extrapolated to St John Brook. These known impacts are significant enough to warrant further consideration towards not stocking with trout. If quantitative assessments are not available and impacts unknown then the precautionary principal should apply and stocking prohibited until research is complete and it indicates a manageable impact.	No	2(d)
94	2	The Department of Fisheries (DoF) should be the agency responsible for co-ordinating baseline studies and ongoing monitoring of native fish populations in St John Brook. In the event of a decline in native fish populations, the DoF should also be responsible for evaluating the need for a recovery program and co-ordinating any such program if required. (24) (32)	It is agreed that the DoF should be the lead agency responsible for co-ordinating baseline studies and ongoing monitoring of native fish populations in St John Brook. Management of native fish and other fauna populations should consider actions necessary to avoid the need for a recovery program rather than instigating one after a decline has occurred.	No	2(h)

Comment No.	No. of Submissions	SUMMARY OF COMMENT <i>(submitter number)</i>	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
95	1	Environmental Weeds How will environmental weeds within the Parks impact on future monies to be spent for weed control? Will there be an all out effort to control these in conservation parks to the detriment of other CALM-managed land adjacent to agriculture. (7)	Priorities for weed control are outlined in CALM's proposed Policy Statement – <i>Environmental Weed Management</i> (subject to final consultation). This is reiterated in the Plan.	Yes	1(e)
96	1	The list of environmental weeds needs to include an unidentified large deciduous tree that has spread significantly in the last few years. (11)	It is unclear as to the species being referred to.	No	2(g)
97	1	CALM should have more involvement in managing weeds such as Blackberry, which has infested areas behind Jarrahwood. (27)	Noted.	No	2(c)
98	5	Environmental weed infestations must be controlled and reduced over the life of the Plan. (11) (12) (17) (21) (22)	Noted.	No	2(a)
99	1	There must be a targeted program to control, reduce and eradicate silver wattle. (21)	Included as a strategy in the Plan.	Yes	1(d)
100	1	The priority for management should be to prevent the escape of weed species from the historical mill site to other areas. (20)	Priority for weed control is based on the threat to conservation values as opposed to sites of infestation, although the two may not be mutually exclusive. Priorities for control are indicated in the Plan.	Yes	1(e)
101	1	We would like to see mention of weed mapping of the Parks. (20)	Noted and included in the strategies.	Yes	1(d)
102	2	A target of 'no increase in weed cover' is too modest. Progressive reductions should be sought on a reasonable timetable. (20) (21)	A decrease in weed cover is accepted as an appropriate target. A progressive decrease in weed cover equates to eradication, which may be costly, extremely difficult to achieve and may not add further to achieving the objective stated in the Plan.	Yes	1(d)

Comment No.	No. of Submissions	SUMMARY OF COMMENT <i>(submitter number)</i>	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
103	1	The target should include the statement that no new species are recorded. (21)	It is inevitable that new weed species will be recorded. The focus should be on protecting conservation values from these species (see the proposed Policy Statement – <i>Environmental Weed Management</i> , which is subject to final consultation).	No	2(d)
104	1	Partnerships with various organisations could be beneficial in implementing weed management programs. (16)	Partnerships with the community are encouraged. Strategies in the Plan have been modified accordingly.	Yes	1(b)
105	12	Introduced Problem Animals We oppose any future stocking of St John Brook with trout. (8) (11) (12) (16) (17) (18) (19) (20) (21) (22) (27)(28)	Noted.	No	2(a)
106	1	There should be no fishing along the Blackwood River and St John Brook to protect marron. (28)	Noted and referred to the relevant authority.	No	2(c)
107	6	We support banning of dogs. (8) (11) (16) (20) (21) (27)	Noted.	No	2(a)
108	2	Strongly support well controlled dogs having access to the Parks. (18) (19)	Dogs can impact on environmental values and social values of the Parks and can inadvertently be affected by CALM's baiting program. Therefore they are prohibited from the Parks.	No	2(e)
109	1	Pigs should be recognised as having a potentially severe impact on fauna. (20)	Noted.	No	2(a)
110	1	If 1080 baiting is being considered in pig control programs, then regular monitoring is required to ensure no negative impact on native wildlife. (16)	Noted.	No	2(a)

Comment No.	No. of Submissions	SUMMARY OF COMMENT <i>(submitter number)</i>	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
111	1	The Nannup community could become involved in monitoring of the Parks to develop awareness of the pig problem and support limited resources. (16)	Partnerships to control feral animals are encouraged.	Yes	1(d)
112	1	On-going fox baiting is supported. (20)	Noted.	No	2(a)
113	1	There should be no cats allowed in the Parks. (27)	Noted.	No	2(a)
114	1	Cats should be controlled and their numbers reduced. (21)	A broad strategy to control pest animals is included in the Plan.	Yes	1(e)
115	2	The Plan should include measures to assist in the control of rabbits. (4) (20)	A broad strategy to control pest animals is included in the Plan.	Yes	1(a)
116	3	Feral animals, particularly pigs, foxes, cats and bees should be controlled. (12) (22) (20)	Noted. Bees will be controlled according to CALM's draft Policy Statement No. 41 – <i>Beekeeping on public land</i> .	No	2(a)
117	1	Introduced pest animals need to be targeted and destroyed humanely, with priority to foxes, cats and pigs. (17)	Noted.	No	2(c)
118	1	The objective should be 'to contain and reduce the numbers of problem animals and their impacts on the Parks' values'. (21)	The objective should relate to protecting conservation values rather than controlling the number of problem animals. Therefore, the text is deemed appropriate.	No	2(a)
119	1	Strategy five should be deleted and a strategy that states 'educating the community about the harmful impacts on native flora and fauna of pigs, dogs, bees and exotic fish such as trout' included. (21)	The impacts of managed honeybees can be controlled. The strategy has been deleted from this section and included in <i>Beekeeping</i> . A strategy on community education has been included in the Plan.	Yes	1(d)
120	1	The target should include 'no loss of species attributable to the impact of foxes, cats or feral bees'. (21)	The primary threatening process to fauna of the Parks is predation by and competition with foxes.	No	2(d)

Comment No.	No. of Submissions	SUMMARY OF COMMENT <i>(submitter number)</i>	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
121	3	The Plan does not acknowledge the presence of Crucian carp in St John Brook. (24) (25) (32)	Noted and Plan amended to state that there is evidence to suggest that carp have been found on the Blackwood River.	Yes	1(e)
122	3	The Conservation Commission does not have the authority to ban the release of trout into St John Brook. (24) (25) (32)	Comment deleted from the Plan.	Yes	1(e)
123	1	The matter of releasing trout into St John Brook is concealed in the text and omitted from the strategies. (24)	Noted and Plan amended to include headings for introduced fish species.	Yes	1(e)
124	3	The Minister for Fisheries recently established a Recreational Freshwater Fisheries Stakeholder Sub-committee (RFFSS) to develop a 5-year strategy for the management of the State's south-west recreational freshwater fisheries, including developing future stocking strategies for the recreational trout fishery. It is important that the Plan clearly acknowledges the role of the RFFSS and the DoF. (24) (25) (32)	The Plan has been amended to acknowledge the role of the RFFSS and the DoF.	Yes	1(a)
125	2	The DoF believes that any matters raised in submissions relating to the proposed removal of trout should be forwarded to the Recreational Freshwater Fisheries Stakeholder Sub-committee (RFFSS) for consideration. In future, DoF would like to suggest that the Conservation Commission flags such reviews with the DoF or the RFFSS prior to any draft management plan being released for public comment. (24) (25)	Noted. In the future, draft management plans will be forwarded to the RFFSS for consideration prior to their release for public comment.	No	2(c)
126	1	Recfishwest believes that effective communication with CALM is essential prior to the finalisation of any draft management plan that may affect recreational freshwater fishing activities throughout the State. (32)	Noted.	No	2(h)
127	3	The DoF is finalising a draft management plan for the translocation of trout into and within Western Australia. (24) (25) (32)	Noted and included in the Plan.	No	2(b)

Comment No.	No. of Submissions	SUMMARY OF COMMENT <i>(submitter number)</i>	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
128	1	Disease Disease caused by <i>Phytophthora cinnamomi</i> is treated with appropriate attention. (20)	Noted.	No	2(a)
129	2	The Parks should be surveyed or mapped for the disease caused by <i>P. cinnamomi</i> . (16) (21)	Supports the Plan.	Yes	1(e)
130	1	The target should be 'no new infestations of the disease caused by <i>P. cinnamomi</i> . (21)	Management is aimed at identifying and protecting significant uninfested areas that are deemed protectable in the medium term.	No	2(d)
131	1	Fire Concerned by the extent to which fire management in the Parks appears as a cornerstone of the Plan, as it appears to be excessive and given entirely undue attention. Frequent and intense monitoring of the impacts of fire is essential before it becomes enshrined as the principal management activity in the Parks. A clear case for the use of fire for maintenance of biodiversity should be made on a species-by-species basis. The assumption that fire diversity is the sufficient and necessary factor to maintain biodiversity is unacceptable. (20)	Noted, although fire is naturally occurring event and is important for maintaining biodiversity.	No	2(b)
132	1	Suggested text changes to final paragraph on page 17. (2)	Changes Incorporated.	Yes	1(a)
133	1	The Fire and Emergency Services Authority (FESA) is concerned that the privately owned freehold locations adjoining the Conservation Parks do not appear to have been afforded any specific bush fire protection measures. FESA is aware that the protection of privately owned land generally requires a measure of bush fire fuel management that may disfavour biodiversity conservation. FESA is however of the view that the protection of life and property should be acknowledged and planned for as a component of management plans. (3)	The Plan currently identifies life and property as assets to be considered as part of fire management. The Plan has been modified to clearly state that surrounding community assets are considered as part of the fire planning process. The protection of life and significant community assets has also been included as a key performance indicator.	Yes	1(e)

Comment No.	No. of Submissions	SUMMARY OF COMMENT (submitter number)	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
134	1	A continual controlled burning program is essential to prevent serious wildfire. (7)	The threat from wildfire will be determined as part of the wildfire threat analysis. This will help to determine the appropriate prescribed burning program (see <i>Fire</i>).	No	2(d)
135	1	I support prescribed burning to prevent wildfires. (8)	Noted.	No	2(a)
136	4	The proposed St John Brook Conservation Park should not be managed under the 'burning program' for the Blackwood Plateau Landscape Conservation Unit. (12) (16) (21) (22)	Noted, although it is not sensible for the Park not be considered as part of the Blackwood Plateau Landscape Conservation Unit.	No	2(b)
137	1	I believe fire regimes to protect the Parks should be based on management of the surrounding areas, with only very small patches of the Parks burnt on an irregular basis and for clearly established (rather than generic) biodiversity outcomes. (20)	The Parks lie within the Blackwood Plateau Landscape Conservation Unit. Fire regimes of the Parks will be considered as part of this wider Unit, and will incorporate information on vital attributes of species within the Parks as well as a wildfire threat analysis (see <i>Fire</i>).	No	2(d)
138	1	Consideration could be given to establishing some 'no planned burn areas'. (20)	Consideration to establishing areas that will not be burnt will be determined at the landscape scale (see <i>Fire</i>).	No	2(d)
139	1	Liaise with landholders prior to burning and don't burn around the total perimeter of private land in a single burn. (27)	Noted. Liaison with landholders does occur following the Master Burn planning process.	No	2(c)
140	1	We believe that the area along St John Brook be exempt from burning to reserve habitat for land and aquatic fauna. (31)	It is recognised that riverine habitat along St John Brook should be protected from large-scale fires that burn entire habitats (see <i>Fire</i>). However, these areas should still be burnt occasionally to either regenerate aged or declining habitats or to protect healthy, intact fauna habitat.	No	2(d)

Comment No.	No. of Submissions	SUMMARY OF COMMENT <i>(submitter number)</i>	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
141	1	If it is deemed necessary to carry out prescribed burning along the Brook then this should be done in autumn and then only in greatly separated short segments. (31)	The Plan recognises the need to burn riverine habitats along St John Brook in patches. A range of seasons will be employed to optimise biodiversity. Noted and considered in the Plan (see <i>Fire</i>).	No	2(d)
142	1	The riparian and wetland areas deserve particular attention as is apparent from several sections of the Plan. (20)	There is provision in the Plan for the protection riparian areas by considering the fire response of species associated with them.	No	2(d)
143	4	Consideration should be given to proper risk assessment and management for wildfire in consultation with the community. (12) (16) (17) (22)	A risk assessment for wildfire is carried out as part of the wildfire threat analysis. The community will be given ample opportunities to comment on prescribed burning programs as part of the Master Burn Plan (see <i>Fire</i>).	No	2(d)
144	1	CALM should apply the precautionary principal and use fire conservatively, especially in the conservation estate, because biodiversity is also lost by fire. CALM needs to show the species that benefit from fire and those that are impacted by fire. (21)	The Plan indicates that, where known, the fire response of different species will be included in all burn prescriptions.	No	2(d)
145	1	A specific wildfire management plan should be developed for the Parks, incorporating the findings and recommendations of the 2004 report of the COAG enquiry into bushfire mitigation and management. This includes the futility of having an annual 'burn target', proper risk assessment and risk management by qualified experts and the use of zoning for fuel management, with clear objectives for each zone. (21)	The risk of wildfire affecting park and surrounding community assets is given due consideration in the Plan.	No	2(d)
146	1	A management plan covering vertebrates can not be drawn up without better knowledge of what is to be managed. (11)	The Plan will be adaptive to any new knowledge that is gained. CALM is currently undertaking research through the <i>fire and biodiversity project</i> to increase this knowledge base. Whilst not specifically located within the Parks, the findings of this research will be applied where appropriate.	No	2(d)

Comment No.	No. of Submissions	SUMMARY OF COMMENT <i>(submitter number)</i>	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
147	1	We do not accept the statement that 'biodiversity can be promoted by use of fire' as the conclusion of finding that some plants and animals are able to survive in a fire-prone environment, the two are not the same. Only in-depth surveys of the Parks will enable management to be based on facts instead of guesses about the numbers of flora and fauna. These surveys should be budgeted for and carried out as a matter of priority. (11)	It is noted in the Plan that most species have adaptive traits with respect to fire and that some species are vulnerable to fire. Fire management will incorporate burn prescriptions that consider both of these aspects. Surveys of the Parks may not occur due to limited resources. However, CALM is aiming at increasing its knowledge of species at the Landscape Conservation Unit scale. As these units have been grouped according to vegetation type, burn regimes for the Parks can be developed.	No	2(d)
148	1	Consideration should be given to the effects of climate change and the requirements of the rare fauna and flora species present in the Park. (16)	Noted. The vital attributes of species are considered in the section on <i>Fire</i> . A new section on climate change has been included in the Plan (See <i>Climate Change</i>).	Yes	1(d)
149	1	The objective should be to increase fire diversity with the emphasis on increasing the area that is long unburnt (20 years or more). (21)	Fire diversity promotes biodiversity and for this reason is desired. Across the Blackwood Plateau Landscape Conservation Unit, areas may remain long unburnt, however these may not necessarily lie within the Parks.	No	2(d)
150	1	There should be a target that: <ul style="list-style-type: none"> ❖ There is an increase in the area that has not been burnt for 20 years or more; ❖ There is no loss of species through either wildfire or too frequent fire, with reporting five years later; ❖ There is no loss of hollow-bearing trees through wildfire or prescribed burning, with reporting one year later (21)	Areas that are excluded from fire will be provided for across the Blackwood Plateau Landscape Conservation Unit. These may not necessarily be located with the Plan area and hence are not included as a target. A performance indicator for loss of species is included in the Plan. The loss of hollow-bearing trees is not practical to measure.	Yes	1(d)

Comment No.	No. of Submissions	SUMMARY OF COMMENT <i>(submitter number)</i>	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
151	1	CALM's Master Burn Plan is not available for public comment. (21)	The Master Burn Plan will be available for public comment. Notification of burn programs has been made a key performance indicator in the Plan.	Yes	1(b)
152	1	No camp fires as campers light these every long weekend. (27)	Noted and already included as an option under <i>Visitor Use and Opportunities</i> .	No	2(d)
153	1	We strongly oppose the proposal for fire management in the Plan. (22)	Noted.	No	2(b)
PART D: MANAGING OUR CULTURAL HERITAGE					
Indigenous Heritage					
154	1	The Blackwood River is a registered Aboriginal site with mythological significance. Further, St John Brook is a tributary of the River and thus it is likely to have the same mythological significance assigned to it. (1)	Noted and Plan amended accordingly.	Yes	1(a)
155	1	Barrabup Pool is listed as an interim site on the Aboriginal Site Register. (1)	Noted and Plan amended accordingly.	Yes	1(a)
156	1	In 2003, the Aboriginal Cultural Material Committee indicated that the Nannup Scarred Trees is not a site under section 5 of the <i>Aboriginal Heritage Act 1972</i> . (1)	Noted and Plan amended accordingly.	Yes	1(a)
157	1	Many other Aboriginal Heritage sites may be recorded in the area of interest than those specifically referred to in the document. (1)	Noted.	No	1(h)
158	1	Reporting on the condition of indigenous and non-indigenous heritage places should be every five years. (21)	This is not the responsibility of CALM.	No	2(c)
159	1	Barrabup Pool is taboo to the aboriginal people due to its relationship with the Waugal. (28)	Noted, although the site is recognised as an interim registered heritage site under the Aboriginal Heritage Act.	No	2(b)

Comment No.	No. of Submissions	SUMMARY OF COMMENT <i>(submitter number)</i>	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
160	1	We support the statement 'the traditional practices, oral history and culture of Aboriginal people should be recorded and where possible, reflected in interpretive information'. (30)	Noted.	No	2(a)
161	1	Non-Indigenous Heritage Aspects of cultural heritage around Cambray Siding and Workers and Barrabup pools needs to be defined accurately on any documentation. (7)	Noted and indicated in <i>Information, Education and Interpretation</i> .	No	2(a)
162	1	The Conservation Commission and CALM should liaise with the National Trust to determine bridges within the Parks that are worthy of restoration and protection, and work with the Trust and other groups to restore them. Key performance indicators should include 'Assessment of non-indigenous cultural sites for restoration and protection' with a target of 'Restoration of non-indigenous heritage places capable of being restored and protected'. (21)	It is not CALM's responsibility to restore non-indigenous heritage sites. However, CALM will liaise with relevant organisations to develop management guidelines for heritage sites.	No	2(c)
163	1	The target should be 'no damage to indigenous or non-indigenous heritage sites'. Reporting on targets should be every five years. (21)	Included as a strategy.	Yes	1(d)
164	3	The Plan fails to acknowledge the non-indigenous heritage value of fishing for both marron and native fish species. (24) (25) (32)	Fishing can be recognised as a long established use in the area but does not qualify as heritage value and is not recognised on any formal registers. The Plan is amended to recognise the pre-established use and the annual Nannup fishing competition, which occurs in the region.	Yes	1(b)
165	1	PART E: MANAGING RECREATION AND TOURISM Visitor Use and Opportunities We have the following recommendations for Barrabup Pool: ✧ Regular grading of access road; and ✧ Regular collection of rubbish at site. (15)	CALM currently provides a rubbish collection service and this is to continue.	Yes	1(e)

Comment No.	No. of Submissions	SUMMARY OF COMMENT <i>(submitter number)</i>	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
166	1	Camping 'upslope' of Barrabup Pool is questionable. Any development on the steep slopes surrounding Barrabup raises concerns regarding erosion. (16)	Camping is proposed on flat, terraced ground upslope of Barrabup Pool to minimise erosion.	Yes	1(e)
167	1	We oppose camping at Barrabup Pool as facilities are available in and around Nannup, which is where commercial development should be located. (21)	CALM provides for a particular camping experience and market demand (at Barrabup Pool) that is not catered for by the commercial sector in this area/region.	No	2(d)
168	1	Extend camping facilities to Barrabup Pool and Cambray. (8)	Camping is proposed at both of these locations.	No	2(a)
169	1	A large area for camping already exists at Workmans Pool and any increase in infrastructure at Barrabup will reduce the visual amenity of the site. (16)	Visitors seek camping opportunities at Barrabup Pool rather than Workmans Pool. To add to this, Workmans Pool is a small site and any further camping will impact on the ambience of the area. Camping at Barrabup Pool will be upslope of the pool and therefore will not affect the visual amenity of the area.	Yes	1(e)
170	2	Barrabup Pool is becoming so popular at peak times that extra vehicle parking is required. (11) (21)	Noted.	No	2(a)
171	1	There should be many more 'no diving' warning signs around Workmans and Barrabup Pools. (21)	Warning signs have been installed and are considered sufficient. The illegal removal of warning signs is an issue for managers.	No	2(d)
172	1	There are at present no facilities for campers at Cambray. This area should continue as a casual camping area. Long drop toilets should be installed for hygiene. (31)	Noted and supported in the Plan.	No	2(a)

Comment No.	No. of Submissions	SUMMARY OF COMMENT <i>(submitter number)</i>	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
173	1	We have the following recommendations for Cambray Siding: <ul style="list-style-type: none"> ❖ Provision of suitable toilets; ❖ Grading of access road; ❖ Provision of BBQ site; ❖ Regular collection of rubbish at site. (15)	Noted and will be considered further if CALM assumes management responsibility for the area. CALM does not currently provide for rubbish collection at this site and will encourage visitors to take their rubbish with them. This is clarified in the Plan.	Yes	1(e)
174	1	Manage the sites at Cambray Siding and the railway bridges because of their proximity to Busselton. (8)	Noted and considered in <i>Non-indigenous Heritage and Visitor Use and Opportunities</i> .	No	2(d)
175	1	Ban motorcycle riding at Cambray Siding whilst the area is being upgraded. (8)	Vehicle access is permitted to Cambray Siding. Permitting vehicle use, but not motorcycle use, would discriminate against this user group.	No	2(d)
176	1	The following key performance indicator should be included: 'In consultation with key stakeholders, development of a recreation management plan for Cambray Siding within two years'. (21)	At present, CALM does not have management responsibility for Cambray Siding. Therefore a performance indicator can not be assigned to the area.	No	2(f)
177	1	There is a need to establish circuit trails in the proposed St John Brook Conservation Park. The Old Timberline Trail commences at Nannup and finishes at Cambray Siding but walkers must return by the same route or organise a pick-up at Cambray Siding. Therefore we recommend the following are developed: <ul style="list-style-type: none"> ❖ Long circuit walks: <ul style="list-style-type: none"> ❖ A return walking track to Mowen Road along St John Brook Road; ❖ Alternatively, a return track along the old railway line; ❖ Alternatively, a return track along the east side of St John Brook back to Barrabup Pool; ❖ Short circuit walks: <ul style="list-style-type: none"> ❖ A circuit track at Barrabup Pool incorporating the site of the Mill Manager's house and include appropriate signage; and ❖ A circuit track from Workman's Pool to the old bank vault and include appropriate signage. (14)	The size of the proposed St John Brook Conservation Park limits opportunities for loop trails. However, walkers can use public roads such as St John Road and the Munda Biddi Bike Trail, which is dual use, to return to Nannup from Cambray Siding. A return trail along the east side of St John Brook is not desired because of the desire to conserve riverine vegetation. Access from Barrabup Pool to the proposed car park at the former Mill manager's house will be provided along with site interpretation. A circuit trail from Workman's Pool to historic features of the old mill site will also be provided.	Yes	1(e)

Comment No.	No. of Submissions	SUMMARY OF COMMENT <i>(submitter number)</i>	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
178	1	Enhance the Old Timberline Trail as suggested. (8)	Noted.	No	2(a)
179	1	I support the development of the Munda Bididi Bike trail. (20)	Noted.	No	2(a)
180	1	Unreasonable restrictions on recreational use such as mountain bike riding and walk trails should not be introduced. (7)	It is unclear what 'unreasonable restrictions includes'. CALM believe that where mountain bike use impacts adversely on environmental or social values then a restriction on use is warranted.	No	2(g)
181	1	CALM should be proactive rather than reactive so that the Old Timberline Trail is further enhanced and the Munda Bididi Trail developed with some costs recoverable through map and guide sales. (11)	Noted.	No	2(a)
182	1	Communal gas barbeques are a useful alternative to firewood if practicable. (16)	Noted and is considered as an option in the Plan.	No	2(a)
183	1	Provide firewood at all campsites to prevent destruction of natural bush. (8)	This is one option that will be considered over the life of the Plan (see <i>Visitor Use and Opportunities</i>).	No	2(d)
184	1	Campers have been observed cutting firewood at Cambray Siding. (31)	Noted and not supported in the Plan.	No	2(b)
185	1	I do not support campfires (in the restricted period), motor bikes, toilets, rubbish facilities or recreation sites within the Parks. (27)	Noted.	No	2(b)
186	1	We would like the following sentence inserted into the Plan: 'Full body contact with public drinking water source reservoirs, arising from swimming and other water based recreational activities, poses an unacceptable risk to public health and is therefore not permitted. It should also be avoided in feeder streams for a distance of at least 2 km from reservoir entry'. (29)	The statement modified but incorporated into the Plan to cater for a drinking water supply, should it be approved. However, it is noted that there is no legislative requirement to restrict water-based recreation activities, or camping, for a distance of 2 km from the reservoir entry.	Yes	1(d)

Comment No.	No. of Submissions	SUMMARY OF COMMENT <i>(submitter number)</i>	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
187	1	Signage at the commencement of walk tracks concerning condition and level of difficulty of track and that safety is a matter of personal responsibility. (14)	Noted and included as part of park interpretation.	Yes	1(b)
188	1	Show the smaller tributaries of St John Brook on a larger map for public use. Some people may like to walk along tributaries when they are flowing. (8)	Minor tributaries have not been marked on maps as they would become too cluttered and would detract from the main information that maps provide.	No	2(h)
189	1	Printed brochure with map of the circuit tracks and the requirements needed for enjoyable and safe bush walks. (14)	Maps of all trails will be identified on park literature.	Yes	1(e)
190	1	Visitor Access The Plan suggests that the road that runs east to Cambray Siding from the intersection of Regalia Road and St John Road will be closed. I suggest that this be reconsidered because: (1) Local residents to the west of the proposed St John Brook Conservation Park would be disadvantaged by the closure, and (2) Access to the proposed St John Brook Conservation Park from the west is essential for reasons of fire safety. (9)	These roads are closed to public access because they form part of the Old Timberline Trail, which is walking only. In the event of a wildfire to the east of the proposed St John Brook Conservation Park, evacuation would occur south of Cambray Siding via St John Road (see <i>Visitor Access</i>).	No	2(d)
191	1	The track along the eastern edge of the proposed St John Brook Conservation Park, north of Cambray Siding, should be maintained to a reasonable standard and public access allowed. (4)	This track is not the primary access route to recreational facilities or opportunities within the Parks and therefore is proposed to become management only (see <i>Visitor Access</i>).	No	2(d)
192	1	Access to Barrabup, Workmans and Cambray pools should be maintained. (14)	Access to these sites will be maintained.	No	2(a)
193	1	Unnecessary tracks should be closed down and rehabilitated. (17)	Noted.	No	2(a)

Comment No.	No. of Submissions	SUMMARY OF COMMENT <i>(submitter number)</i>	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
194	1	A target for visitor access should be 'Number of tracks and roads closed and rehabilitated'. (21)	Closing and rehabilitating tracks and roads is an output of the Plan rather than a target that is to be achieved. Not all tracks will be rehabilitated as some will remain for management purposes.	No	2(d)
195	1	I am not in favour of permitting four-wheel drive access to the Blackwood River, nor to any part of the Parks. There appears to be no justification for such activity. (20)	Four-wheel drive is a legitimate activity within conservation parks. Access to the Blackwood River occurs via Brook Road. There is a long history of four-wheel drive use along this road, and given the limited opportunities elsewhere in CALM's Blackwood District, this use will continue (see <i>Visitor Access</i>).	No	2(d)
196	1	There should be better exclusion of off-road vehicles along the Old Timberline Trail from Regalia Road to Barrabup Pool. If not barred completely, then restrictions ought to be placed on the use of trail and quad bikes (i.e. confined to specified tracks away from watercourses). (31)	The Plan excludes motor vehicle use, including trail and quad bikes, from the Old Timberline Trail. Cycle use is permitted.	No	2(a)
197	3	All existing roads should remain open to enable recreational fishers and other Park users continued access along the entire length of the Brook. (24) (25) (32)	The Plan facilitates access to primary recreation sites with unnecessary access restricted to preserve the riparian vegetation along St John Brook. However, it is possible to walk or cycle along most of the Brook via the Old Timberline Trail and Munda Bididi Bike Trail (see <i>Visitor Access</i>).	No	2(d)
198	3	The needs of the elderly and disabled need to be taken into consideration in future planning for visitor access. (24) (25) (32)	Elderly and disabled visitors are catered for with facilities at Barrabup Pool (see <i>Visitor Use and Opportunities</i>)	No	2(d)
199	2	We would like CALM to consider public access to adjoining private property, including locations 8235, 1561, 9946 and 6681. (5) (10)	CALM will permit the use of existing tracks to access adjoining private property where there is no alternative access to the property.	Yes	1(e)

Comment No.	No. of Submissions	SUMMARY OF COMMENT <i>(submitter number)</i>	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
200	1	Gazetted roads for all private land surrounded by CALM land. (27)	This statement is unclear.	No	2(g)
201	2	Public access to the Parks should be free. (14) (7)	Public access to the Parks will be determined by Government policy and is not appropriate for inclusion in this Plan.	No	2(h)
202	1	Any access to the proposed park from Vasse Highway will require the approval of Main Roads Western Australia. (35)	Noted. No new access to the Parks is proposed from Vasse Highway.	No	2(d)
203	2	Tourism and Commercial Operations Commercial operations or developments should not be permitted in conservation parks. (11) (16)	It is preferred that commercial developments be located outside of the Parks.	No	2(a)
204	1	We disagree with the statement in the Plan regarding possible future accommodation and recreation development. The provision for a high quality, low impact, eco lodge type development should be included in the final management plan, despite the supply of accommodation in the Nannup area meeting current demands. (30)	The Plan does allow for future accommodation developments although CALM's preference is for these to be located outside the Parks (see <i>Tourism and Commercial Operations</i>).	No	2(d)
205	9	PART F: MANAGING SUSTAINABLE RESOURCE USE Petroleum Exploration and Production We oppose mineral and petroleum exploration and production in the Parks. (8) (11) (12) (17) (18) (19) (21) (22) (30)	Noted.	No	2(a)
206	2	The current exploration permit (EP 416) should not be renewed. (11) (21)	Noted.	No	2(a)
207	1	Any proposal for the establishment of conservation parks must incorporate a consideration of the environmental, social and economic implications of their establishment. To maintain the economic input of minerals and petroleum industries to the south-west, it is important that the resources sector has access to the Parks. (13)	Noted and considered as part of the Forest Management Plan 2004-2013, which is currently in place for this area.	No	2(d)

Comment No.	No. of Submissions	SUMMARY OF COMMENT <i>(submitter number)</i>	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
208	1	It is important that the State honours the rights of existing tenements, as well as ensuring that the same rights are conferred to tenement applications that were lodged prior to the announcement of the proposed boundaries. (13)	Noted.	No	2(d)
209	1	Where there is a potential conflict between a proposed extension of a conservation park and mineral or petroleum prospectivity, a strategy of using an alternative land classification should be considered. (13)	There is no difference in the approval process for mining in State forest (current tenure) as opposed to the proposed classification of class A conservation park.	No	2(d)
210	1	Provision for future mineral exploration in this area under appropriate approvals and environmental management conditions must be maintained. (13)	Provision for mineral exploration is stated in the Plan but this must be in accord with the appropriate approval process.	No	2(d)
211	1	There is specific reference to petroleum exploration and beekeeping but not to other kinds of land-disturbing activity (i.e. mineral exploration). (13)	Noted. There are no mining tenements covering the Parks. However, a section has been included in the Plan that covers the extraction of basic raw materials.	Yes	1(e)
212	5	Beekeeping There should be no commercial apiary sites in the Parks and no renewal of the existing apiary site permit. (8) (16) (20) (21) (22)	Noted. Beekeeping will be managed according to the Department's draft Policy Statement No. 41 – <i>Beekeeping on public land</i> . An assessment using the environmental and management criteria stated in the Policy found that the existing site is suitable.	No	2(d)
213	1	PART G: INVOLVING THE COMMUNITY Information, Education and Interpretation More detailed information regarding the management of the northern sector of the proposed St John Brook Conservation Park should be sent to private landholders in the area. (4)	Noted.	No	2(c)
214	1	The development of an interpretation plan that 'tells the story' of the St John Brook area but also encompasses the historic and cultural significance of the Blackwood River is supported. (30)	Noted.	No	2(a)

Comment No.	No. of Submissions	SUMMARY OF COMMENT <i>(submitter number)</i>	DISCUSSION / ACTION TAKEN	PLAN AMENDED	CRITERIA
215	1	Some effort will be required to educate people about the need for changes in the uses of the Parks, including closure of tracks and exclusion of some forms of recreation. (20)	Noted and Plan amended accordingly.	Yes	1(d)
216	1	The Parks should be advertised once improvements are complete. (8)	Noted but beyond the scope of the Plan.	No	2(c)
		Monitoring and Implementing the Plan <i>No submissions</i>			
		PERSONAL COMMUNICATIONS <i>No submissions</i>			
		REFERENCES <i>No submissions</i>			

APPENDIX 1

SUBMITTERS TO THE PLAN

Individuals

R. Armstrong
H.A. Blythe
H. Bone
A. Davies
C. and L. Davies
T.S. and J.A. Haddon
A. Hall
M. Irwin
B. Jenkins
G. Lawn
M. Pritchard
B.S. and J. Slinger

Community Organisations

Busselton-Dunsborough Environment Centre
Balingup Friends of the Forest Inc
Conservation Council of Western Australia
Nannup Visitor Centre
Recfishwest
South West Forests Defence Foundation Inc
WA Naturalists Club Inc

Local Government

Shire of Nannup

State and Federal Government

Department of Environment
Department of Fisheries
Department of Indigenous Affairs
Department of Industry and Resources
Department of Local Government and Regional Development
Fire and Emergency Services Authority of Western Australia
Main Roads Western Australia
Recreational Fisheries Advisory Committee
Telstra
Tourism Western Australia
Water Corporation

Other Groups

Alinta Gas
Chamber of Minerals and Energy Western Australia
C. Sharp MLC
Western Power