

Wheatbelt Region parks and reserves

summary of issues from public submissions
to the draft management plan

2021



Dryandra Woodland. Photo – Paul Roberts/Department of Biodiversity, Conservation and Attractions

Department of Biodiversity, Conservation and Attractions
Conservation and Parks Commission

1. INTRODUCTION

On 5 February 2019, the *Wheatbelt Region parks and reserves draft management plan 2019* (the draft plan) was released by the Minister for Environment for a two-month public submission period, which closed on 5 April 2019. A total of 28 submissions were received.

This document summarises the key issues raised in the public submissions and will aid the Conservation and Parks Commission in considering their approval of the plan under s59A(1) of the *Conservation and Land Management Act 1984* (CALM Act).

2. PLAN DISTRIBUTION

Coinciding with the release of the draft plan, a public notice about the proposal was published in the *Government Gazette* and *The West Australian* and *Farm Weekly* newspapers, as required under s57(2) of the CALM Act. The draft plan was distributed to relevant Ministers, State Government departments and local government authorities as per s59 of the CALM Act. Notifications of the release of the draft plan were also distributed to stakeholder groups and individuals who expressed an interest during the planning process. Copies of the draft plan were made available at the Narrogin, Merredin and Kensington offices of the Department of Biodiversity, Conservation and Attractions (the department). The department's website was also used to further notify the public about the proposal and submission period along with digital copies of the draft plan and a Survey Monkey online submission form, where interested parties were encouraged to lodge submissions.

3. SUBMISSION PROCESSING AND ANALYSIS METHODOLOGY

A total of 28 submissions were received consisting of 16 written submissions (received via email or post) and 12 online Survey Monkey forms.

Information was recorded relating to the submitter's contact details and location, submitter type/interests (e.g. conservation) and key issues identified. Once the data entry was complete, statistics were generated on several aspects of the public submissions including an overview of submitter demographics, an explanation of the key issues raised in submissions, and a summary of key issues by chapter/sector. This report describes these results.

4. WHO PROVIDED FEEDBACK

Of the 28 submissions received, most were from non-government organisations representing a variety of interests such as bushwalking, birdwatching, beekeeping, rock climbing and reserve conservation in general. Seven were from local government, six were from other state government agencies and four were from private individuals or companies (see Appendix 1). The majority of submitters were locally-based or had a specific local interest. The remaining submitters were based in the Perth area and all but one were either from state government or non-government organisation representatives.

The 28 submissions received translated to 202 comments of which almost half provided general administrative feedback on the draft plan. Overall, 61% of the comments were neutral or supportive in nature, consistent with the concepts presented within the draft plan or they clearly addressed issues outside the scope of the draft plan. Fifty-one of the remaining comments (25%) resulted in an amendment in the *Wheatbelt Region parks and reserves management plan* (the final plan). While 13% did not result in an amendment to the final plan, most of these comments were associated with *Appendix 4 – Proposed reserves*, where the issues raised did not alter the aspirational intent of the table and resolution would involve processes external to the management planning process.

Appendix 4 Proposed Reserves generated the most discussion involving 11 different submitters and 23 comments predominantly relating to a particular reserve of interest to each submitter. Other areas of

interest to submitters included Dryandra Woodland (current and proposed tenure as well as biodiversity and social values), general recreation and tourism opportunities and benefits, bushwalking, birds (conservation and watching) and rock climbing. Provisions for rock climbing and water skiing, landscape-scale management including resourcing issues and off-reserve management and partnerships, impacts from forestry operations, recreation and other site development, fire management, unauthorised activities and apiary were also key areas addressed. The remaining comments were spread among the other components of the draft plan.

5. KEY ISSUES

In general, a number of submitters specifically stated their support for the draft plan, commenting on the successful integration and proposed management of the key values (i.e. natural, cultural social and resources) within the planning area over the life of the plan.

5.1 Planning area

Further detail on the relationship between the final plan and other existing CALM Act management plans was sought as well as the potential for the preparation of additional area-specific management plans for conservation reserves with particular significance in the Region. The final plan has been amended to clarify that it will supersede and prevail over the existing CALM Act management plans (which will continue to be used only as guiding documents for operational purposes where they remain consistent with the final plan). Similarly, area-specific operational plans may be prepared, if required. These non-statutory plans would be consistent with the overarching regional CALM Act management plan but contain more detailed management arrangements for implementation on a day to day basis. A diagram depicting the management planning hierarchy (including relevant legislation and policy) has been added to the final plan. The amended text has been relocated to section 5 *Management Context*.

It was suggested that privately owned land of high conservation value be acquired by the government when it becomes available. The final plan has been amended to consider such opportunities.

5.2 Management context

There was strong support for the tenure proposal to convert part of Dryandra Woodland to national park and to identify it as a priority for the planning area. One submitter also proposed that the final plan incorporate a longer-term intent to eventually absorb all of the State forest areas entirely into the national park. Others acknowledged the variety of values, in addition to nature-based, that are currently supported by the Dryandra Woodland and noted that it is important to retain a balance of these. A similar point was made by another submitter but applicable across the broader planning area. The department agrees that a balanced approach to facilitate multiple use within Dryandra Woodland and across the broader region is appropriate and consistent with the department's management objectives.

It was noted that resource availability was likely to be a limiting factor for implementation of this management plan and that the draft plan did not adequately acknowledge this point. The final plan has been amended to include a dot point under management considerations in the first chapter that states 'implementation of the plan is within the framework of available resources', although the issue about limited resources was made in various sections across the whole plan.

5.3 Geology, landforms and soils

One submitter raised concerns about visitor disturbance to rock outcrops. While the draft plan addresses this issue, the final plan includes minor amendments to management strategies in this particular section. Elsewhere in the final plan, more information has been added about off-road visitor access, including vulnerability of rock outcrops and it has also been incorporated as a key interpretive theme for the planning area.

5.4 Altered hydrology

It was recommended that the final plan propose more regular drainage pumping and disposal of groundwater. Drainage pumping and disposal and the rate at which it is undertaken will depend upon the downstream impact upon key values including important species and communities that may have specific ecological water requirements and neighbouring private properties. Engineering interventions such as this need to be assessed on a case by case basis and ideally only undertaken where there are no other suitable alternatives (e.g. revegetation) and the cost justifies the intended outcome. This is already reflected in the draft plan.

5.5 Native plants, animals and ecological communities

The limited and fragmented pockets of remnant vegetation within the Region and the importance of their reservation and protection was noted. Opportunities to establish vegetation corridors, connecting reserves and granite outcrops across the broader landscape, was strongly encouraged. These comments are consistent with the concepts discussed within the draft plan.

A number of submitters commented on the values of Dryandra Woodland, indicating strong support for the numbat and woylie conservation programs and the visitor opportunities (recreation, tourism and education) that it presents. Two submitters commented on their capacity to assist the department with promoting Dryandra Woodland and its key values. It was suggested that fauna habitat zones be considered for the numbat and woylie and enlarging the predator-proof enclosure would also be supported. It is unlikely that either of these proposals would have significant additional conservation benefits in this particular area, though there is potential to improve the utilisation of current enclosures for fauna-based tourism and the department encourages such opportunities in the draft plan - see section 18 *Commercial operations and tourism*.

One submitter indicated their particular interest in bird conservation, their concern for the future of native birds in the Wheatbelt and their enthusiasm to be involved in associated management and/or research opportunities. Another submitter indicated their support for more biological survey work to be undertaken in the Wheatbelt. Bird watching was also noted as a key interest that leads to visitation of important tourism attractions and recreation sites within the planning area.

5.6 Invasive plants and animals

It was suggested the department should encourage annual fox culls to be implemented by organised shooting teams. This comment is consistent with the intent of the draft management plan, recognising that introduced animal control is a partnership, and the department works wherever possible with the community, especially with neighbours and biosecurity groups, to support off-reserve control programs, which in conjunction with the department's baiting program, is likely to have greater success in reducing the impact of introduced animals. The importance of integrated cross-boundary management is also discussed on pp. 2 and 50-51 of the draft plan, which includes landscape-scale issues such as introduced species. No further amendment in the final plan is necessary.

5.7 Fire

One submitter commented that there is not enough research into fire management, utilising old research and thinking. Another felt more planning and implementation of controlled burning and firebreaks around each individual reserve was required. Controlled burning and the establishment of firebreaks are two methods (among others) of fire management and implementation is determined by a range of known factors derived from years of fire use, behaviour and ecological response (i.e. 'utilising old research and thinking') coupled with current land use and property, climate, safety and resource availability in mind. More specifically, in the predominantly cleared landscape of the Wheatbelt Region, the natural values of the reserves may outweigh these mitigation strategies when the risk of ignition is considered low (1 in 300 years). Where there is higher potential for life and assets to be impacted, these fire management strategies would have greater consideration. The fire planning principles identified within the draft plan (pp. 28-29) are guiding statements compiled by highly

experienced practitioners and a primary objective for fire management is to continue to build upon that knowledge through research, operations and community consultation, subsequently applying an adaptive management approach as required (see p 29). It is considered that the draft plan adequately covers fire management with respect to these comments and no further amendments have been made.

It was also suggested that local fire brigades should have more control of fire suppression as they have more knowledge of the situation. The department acknowledges the expertise of local bushfire brigades and supports and encourages their continued involvement in fire suppression on CALM Act lands (see section 12 *Fire* and in particular management strategy # 9 on page 30 and section 19 *Involving the community - Off-reserve management and partnerships*), however the legal management responsibility for these lands remains with the department. The department also has in-depth knowledge of the reserves and their key values that need protection as well as knowledge and experience in fire management. The *Bushfires Act 1954* provides adequate authority for a bush fire control officer to extinguish a bushfire on any land which is vital where brigades may be the first responders to a bushfire on CALM Act land. An amendment to the final plan is not required.

5.8 Aboriginal cultural heritage

It was recommended that the final plan review the status of the *Aboriginal Heritage Act 1972*. The same submitter also suggested an additional dot point on page 31 of the draft plan 'fostering an awareness and valuing of Aboriginal heritage by all visitors to the parks and reserves'. The submitter's comments are supported, with suggestions incorporated into the final plan.

5.9 People on country (recreation, tourism and community values)

General supportive comments were made regarding the integration of key values within the planning area and in particular, submitters strongly advocated opportunities for visitation and outdoor recreation and tourism within the natural environment because it provides great benefits for community wellbeing while engendering support for conservation initiatives, especially through interpretive trails and education facilities. Submitters specifically noted the value of Dryandra Woodland (and Barna Mia), the natural attraction of the region's important wetlands and granite outcrops as well as the number of opportunities for bushwalking and nature appreciation (especially bird watching).

5.10 Visitor planning

A reference to Trails WA was inaccurately represented (as part of the agency) in the draft management plan. The final plan has been amended. Other recommended webpage resources associated with this section were reviewed and incorporated into the final plan where applicable.

Some submitters requested that peak bodies (e.g. bushwalking, rock climbing, bird research) be specifically acknowledged as a key stakeholder group for consultation processes where issues relate to their knowledge, experience and interest. The final plan has been amended in various places where applicable.

One submitter was very supportive of the intent to explore opportunities for wilderness experiences in the planning area and suggested that this also be reflected in the department's approach to site development. The final plan has been amended as suggested.

The recreation and tourism potential of one particular reserve was identified. This is acknowledged. The draft management plan already outlines departmental policy and processes for considering such opportunities/proposals, which will be assessed operationally on a case by case basis as required.

5.11 Visitor access

It was suggested that the second last sentence of paragraph 2 on P. 43 be amended by adding the italicised wording 'Access roads and parking areas where they exist *or where a substantive need is identified*, will be progressively improved *or developed*, subject to resources...'. The final plan has been amended as suggested.

5.12 Visitor activities

One submission was focused on opportunities for rock climbing in the Wheatbelt Region. It was pointed out that rock climbing is a legitimate recreational pursuit guided by core values aligning with those promoted in the draft plan (access, environment and safety responsibilities). It was also noted that rock climbing is permitted under other existing departmental management plans (*Walpole wilderness adjacent parks and reserves management plan 2008, Management plan no. 61*). The submitter advocates rock climbing as a recreational activity that can be sustainably managed in close liaison with the department. It was requested that rock climbing be addressed as a distinct recreational activity within the final plan rather than being categorized alongside clearly illegal activities such as rubbish dumping and other unauthorised activities.

A new subsection on rock climbing under section *Visitor activities* has been incorporated into the final plan. The new section recognises rock climbing as a formal recreation activity and the desire for its provision within the planning area. It outlines the current legislative restrictions and other potential issues associated with its implementation. Consideration of future rock climbing proposals in the planning area are also discussed.

A few submitters noted general observations of informal camping and campfires as well as unauthorised collection of firewood and off-road driving (including trail bikes). Concerns were also raised about hunting and shooting activities being incompatible with the values of conservation reserves. Inappropriate human activities are already discussed in the draft plan. The department has enforcement procedures in place for unauthorised activities and in some circumstances the provision for customary activities may apply. There are some minor amendments in the final plan associated with off-road visitor access and unauthorised collection of firewood for campfires.

5.13 Scenic driving and motorized recreation and commercial operations and tourism

Facilitation of scenic self-drive journeys (e.g. Granite Way) in the planning area were supported, noting a recent marketing focus on such opportunities within the tourism industry. Opportunities for future guided tours, including cultural tourism, were also supported. The final plan has been amended to acknowledge the assistance of the tourism industry in promoting key values of the planning area.

5.14 Involving the community

It was suggested that a management committee of adjoining landholders, local interest and shire representatives should be formed to advise and submit suggestions for implementing the final plan. Community-based bodies such as NRM catchment councils and Land Conservation District Committees, fire advisory bodies and LGAs already exist and provide well-informed advice to the department's Wheatbelt Region. Public consultation and participation as well as facilitation of community-based advisory groups are already addressed in the draft plan. The Good neighbour policy is also an excellent tool that will be used to implement the final plan.

5.15 Off-reserve management and partnerships

It was suggested that the department consider financial incentives to encourage increased participation in the Land for Wildlife program. While the management plan supports the facilitation of this program, it is outside the scope of the management plan to review department-wide programs as part of the planning process.

One submitter stated that the onus on private properties for conservation and land management is missing. The department disagrees with this comment. The draft plan has its own section dedicated to community involvement including off-reserve management and partnerships and cross-boundary management, which addresses landscape-scale issues such as fire, introduced species and salinity (see pp. 49-51).

5.16 Forest products

There was concern about the impacts of ongoing forestry operations upon visitor experiences in nearby recreation areas. The department does not consider the proposed scale of brown mallet harvesting to be significant and visitor impacts are likely to be minimal. Visual impact management arising specifically from timber harvesting is already addressed in the draft plan. The section on visual landscape management has been amended in the final plan to address visual impacts more generally.

5.17 Beekeeping

One submitter commented that the draft plan under-valued the apiary industry and the importance of the Dryandra Woodland to beekeeping and expressed their disappointment in the lack of consultation during the planning process. There is a specific paragraph in the draft plan that refers to beekeeping and in particular it points out the value of brown mallet in Dryandra Woodland as a major source of honey. The draft plan further provides for beekeeping indicating that it will continue to be managed in accordance with the relevant departmental policy and guidelines. The purpose of the draft plan being released for 3 months was to provide all user groups with adequate opportunity to be consulted with regard to this management plan and to provide useful feedback that could be considered during the preparation of the final plan. The submitter did not suggest any amendments for the final plan.

5.18 Water resources

Updated information regarding public drinking water source areas (PDWSAs) and associated management documents (policies) was provided for the department's reference. The final plan has been amended in accordance with this advice.

5.19 Maps

It was suggested that satellite images and labelling of reserve numbers and GPS coordinates would be more useful. Due to the high number of reserves within the planning area, identifying each of them with such detail would make the map difficult to read and presenting satellite imagery at this scale would not provide any additional benefit. The final plan contains maps with increased resolution after pixilation was identified in the electronic version of the draft plan.

5.20 Appendix 4 Proposed reserves

Eleven different submitters responded to *Appendix 4 Proposed reserves*, generating the most comments overall for any particular component of the draft plan. While some submitters indicated support for specific lands to become conservation estate in the future, others raised concerns for various reasons including vested interest in mining, cultural values, potential implications upon neighbouring land owners, access to, and use of, emergency water infrastructure/supply and other general community requirements. While these concerns and the requirement for consultation is acknowledged, the intent of the table is only aspirational in nature. It has been prepared to indicate only where other lands have been identified by the department as having important conservation and/or recreation and tourism values. These lands are not part of the conservation estate. Most are not managed by the department or part of the planning area. These lands are also not necessarily an existing formal tenure proposal (the process involving consultation) or necessarily going to become conservation estate.

Furthermore, formal tenure proposals are not assessed through the management planning process. There is no requirement to amend the final plan in this regard, however should the department pursue its interest further with these lands, consultation will be undertaken through external tenure proposal processes.

One submitter noted inconsistency of consultation levels identified throughout the table. To avoid confusion, the final plan has removed reserve-specific references to consultation and now provides a single clear statement upfront that clarifies consultation will be a requirement of the formal tenure proposal process.

It was suggested that there should be more information about Appendix 4 within the body of the management plan and that Appendix 4 should be reviewed for clarity, currency and consistency. Appendix 4 is not part of the planning area and therefore its incorporation into the final plan is not applicable, except for section *Native plants and plant communities*, where the discussion about under-representation of vegetation associations within the conservation reserve system (and regionally, within the planning area) provides context and clarification for the purpose of the table and rationale for the selected lands identified within it. Appendix 4 itself has been closely reviewed, updated and clarified.

5.21 Appendix 8 Top-ranked recreation sites and reserves for recreation potential

Lake Cronin was identified by one submitter as of particular importance to the Hyden community. The submitter indicated their concern about the listing of this reserve in Appendix 8, stating that future recreational development of this small reserve would impact the current key values and management capability. Day use sites, including those that facilitate only passive recreation such as picnicking or bird watching, are still considered by the department as a recreation site and this includes Lake Cronin. Appendix 8 states that the department may not necessarily promote or encourage the development of these sites and that more analysis may exclude some sites from further development. Currently there are no plans for further development at Lake Cronin.

The 'apparent' high ranking of Dryandra Woodland and Boyagin Nature Reserve as (passive) recreation sites was supported but it was suggested that the final plan clarify that the ranking is from highest to lowest. The final plan has been amended as suggested.

5.22 Appendix 9 Waterbodies where powerboating, including water-skiing, occurs

It was noted that Lake Gounter was particularly important to the Hyden community, stating the long history of recreation use, including water-based activities. The proposal to prohibit future use of Lake Gounter for power boating was strongly opposed. The table in Appendix 9 of the final plan has been amended to consider future gazettal and a change in reserve purpose if there is community desire and lake levels to support it.

6. SUMMARY

There were relatively few submissions to the draft management plan. However, there was a balanced representation between key stakeholder groups (i.e. local government, state government, peak bodies and private individuals/companies).

Key areas of interest included proposed reserves and provision for rock climbing and water skiing, Dryandra Woodland and the requirement for off-reserve conservation across the Region. Generally, the draft plan was well supported and the most significant concerns were easily addressed with further clarification in the final plan.

Appendix 1. Submitters to the *Wheatbelt Region parks and reserves draft management plan 2019*

State Government

Minister for Water; Fisheries; Forestry; Innovation and CIT; Science
Department of Local Government, Sport and Cultural Industries
Department of Water and Environmental Regulation (2)
Department of Mines, Industry Regulation and Safety
Department of Jobs, Tourism, Science and Innovation (on behalf of, and subsequent to correspondence from, the Minister for Tourism)
Department of Primary Industries and Regional Development

Local Government

Shire of Dumbleyung
Shire of Williams
Shire of Kent
Shire of Narrogin
Shire of Bruce Rock
Shire of Westonia
Wheatbelt East Regional Organisation of Councils (WEROC)

Non-government organisations/community groups

Busselton Naturalists Club
South West Aboriginal Land & Sea Council
Bee Industry Council of Western Australia (BICWA)
Hyden Karlgarin Landcare (2)
Bushwalking WA
Hyden Progress Association
Climbers Association of WA
Birdlife WA
Dryandra Country Visitors Centre

Private company

Ramelius Resources Ltd

Individuals/ Neighbour/other

Mr Alan Gelmi
Mr Michael Hayden
Mr David James