



Department of Conservation and Land Management, W.A.

Shannon Park and D'Entrecasteaux National Park



Summary of Public Submissions
August 1987

Management Plan No. 6

SHANNON PARK AND D'ENTRECASTEAUX
NATIONAL PARK

SUMMARY OF PUBLIC SUBMISSIONS

AUGUST 1987

by

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MANAGEMENT PLAN NO. 6

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INTRODUCTION

This document summarises submissions to the draft management plan for the Shannon Park and D'Entrecasteaux National Park. Comments have been detailed according to the part of the draft plan to which they refer. Cross-references to the appropriate part of the re-structured final management plan are given in brackets after each heading.

The draft management plan (DMP) for Shannon Park and D'Entrecasteaux National Park was released by the Minister for Conservation and Land Management, Mr B. J. Hodge MLA at a public meeting held at the Shannon recreation site on 1 May 1986. It was announced that the plan was available for comment until 18 July 1986. This was extended until 22 August 1986 to accommodate the number of respondents who felt that the depth and scope of the report required extra time to collate a submission. Submissions received after this date were also considered.

Input from the public, conservation groups, other interest groups and Government departments was invited both prior to and following the release of the DMP. Prior to its release, input was sought via 'A Strategy for Management Planning' (the 'blue book') and through discussions with various interest groups and individuals.

The DMP and accompanying brochure explaining the management plan were distributed to State and Commonwealth Government departments, tertiary institutions, conservation groups, recreation groups and individuals who had expressed an interest in management plans for conservation areas. Plans and brochures were also distributed to those who submitted comments on 'A Strategy for Management Planning' and local interest groups. Plans and brochures were also available through the Department of Conservation and Land Management's (CALM) metropolitan, regional and district offices. In addition, plans were available for inspection at the Manjimup Shire Office and library, and the Nannup Shire Office and library. Brochures were also available at the old Shannon townsite information shelter.

After the DMP release, additional input was sought, and information made available, through articles in local newspapers, CALM's Landscape magazine, plus meetings and informal discussions with interested individuals and groups.

ANALYSIS OF PUBLIC SUBMISSIONS

The public submissions to the Shannon-D'Entrecasteaux management plan were reviewed in three stages.

First, the public submissions were summarised to allow analysis. This document provides such a summary.

Second, the submissions were analysed using set criteria. Changes were made if the submission:

- . indicated a change in political commitment, legislation and/or management policies (A).
- . provided additional information on biological, physical or social resources which has implications in terms of the capacity of the Park environment to sustain the proposed activities (B).
- . provided additional information on affected user groups (C).
- . referred to a marked lack of clarity in the existing prescriptions (D).
- . indicated that prescriptions on a particular issue were needed and had not been included in the DMP (E).
- . indicated tenure constraints (F).

Changes were not made if:

- . there was clear support for the draft proposal.
- . revision was not feasible (generally because the points contradicted existing legislation, government or departmental policy).
- . points made were already in the plan.
- . submissions indicated strongly opposing views, with the existing prescriptions providing the only 'middle ground'.

Third, the DMP was reviewed and amended where necessary. Table 1 indicates the degree of revision, provides a summary of changes made and reasons for revision, and refers to the relevant assessment criteria, for the major issues. Numerous other minor editorial changes referred to in the submissions have also been made.

Following consideration and endorsement of the revised prescriptions by the Policy Directorate and National Parks and Nature Conservation Authority, the Shires of Manjimup and Nannup, the Karri-D'Entrecasteaux Regional Advisory Committee, Keep Our Coasts Open Committee and representatives of conservation groups were briefed regarding the revisions. Prior to forwarding this document and the amended draft management plan to the Minister for Conservation and Land Management for approval, both documents will be available to the Shires of Manjimup and Nannup and the Karri-D'Entrecasteaux Regional Advisory Committee for formal comment. These comments will be made available to the Minister.

TABLE 1. SUMMARY OF MAJOR CHANGES TO THE
SHANNON - D'ENTRECASTEAUX DRAFT MANAGEMENT PLAN

ISSUE	RELEVANT SECTION OF DMP AND SPS	RELEVANT SECTION OF FINAL MANAGEMENT PLAN	DEGREE OF REVISION	SUMMARY OF CHANGES MADE	REASON FOR REVISION	RELEVANT ASSESSMENT CRITERIA #
Tenure of Shannon Park	---	D2.1	addition	* declare the Shannon a national park	* government direction	A
Tenure of D'Entrecasteaux National Park	---	D2.1	addition	* details provided on current tenure and clarification of proposed changes	* management direction needed	E
The purpose 'National Park and Water'	6.2.3	D3.2	addition	* emphasis on range of values - conservation, recreation and potential water supply - contributed to the Parks by their water resources	* dual purpose of D'Entrecasteaux, comprehensive sub- missions from the Water Authority of Western Australia	D, E
General Access	6.3.3	D7.1	modifi- cation addition	* re-worded * monitoring of tracks/ roads and associated facilities	* clarifies meaning * submissions drew atten- tion to the need for monitoring	D

ISSUE	RELEVANT SECTION OF DMP AND SPS	RELEVANT SECTION OF FINAL MANAGEMENT PLAN	DEGREE OF REVISION	SUMMARY OF CHANGES MADE	REASON FOR REVISION	RELEVANT ASSESSMENT CRITERIA #
Vehicles Off-road Yeagarup Dunes	6.3.4	D9.2	modifi- cation	* re-worded	* clarifies meaning	D
Coastal Access	6.3.5	D7.2	modifi- cation	* re-worded	* clarifies meaning	D
Horse-riding	6.3.6	D9.3	change	* no permits required by general public	* discrimination against one user group, lack of management capability to implement	C
Boat use	6.3.8	D9.6	change	* Lake Jasper zoned for power boat use	* additional information indicates power boating should have minimal impact	B
Marroning	6.3.9.1	D9.7	change	* closure of Shannon Basin	* submission drew attention to over- fishing, need to retain one reference area free from harvesting	B, D

ISSUE	RELEVANT SECTION OF DMP AND SPS	RELEVANT SECTION OF FINAL MANAGEMENT PLAN	DEGREE OF REVISION	SUMMARY OF CHANGES MADE	REASON FOR REVISION	RELEVANT ASSESSMENT CRITERIA #
Trout	6.3.9.2	D9.8	change	* no re-stocking in Parks, continued re- stocking of river sections outside the Parks	* additional information provided in submissions	B
Squatters' Huts	6.4.1	D9.9	modifi- cation	* re-worded	* clarifies meaning	D
			modifi- cation	* assessment criteria to be developed to evaluate all huts	* need for objective basis for decision- making given the wide range of views submitted	B
			change	* no reference to Camfield	* addition of Camfield to the National Park strongly opposed	F

ISSUE	RELEVANT SECTION OF DMP AND SPS	RELEVANT SECTION OF FINAL MANAGEMENT PLAN	DEGREE OF REVISION	SUMMARY OF CHANGES MADE	REASON FOR REVISION	RELEVANT ASSESSMENT CRITERIA #
Mining	6.4.4	D11.1	modifi- cation	* outline of NPNCA attitude towards mining provided	* clarification	D
			change	* limestone quarry will remain open, with accompanying environ- ment conditions, and an alternative site outside the Parks actively sought	* clarification of legislative constraints	D
Finance	6.5.1	D12.1	modifi- cation	* re-worded	* clarifies meaning	D

ISSUE	RELEVANT SECTION OF DMP AND SPS	RELEVANT SECTION OF FINAL MANAGEMENT PLAN	DEGREE OF REVISION	SUMMARY OF CHANGES MADE	REASON FOR REVISION 4	RELEVANT ASSESSMENT CRITERIA #
Park Boundaries	6.5.2	D2.2	change	* implement Chesapeake and part of Yeagarup prescription, evaluate the remainder over the period of the Plan	* opposition to the remainder, pursuit of prescriptions in DMP could hinder gazettal of the Parks	F
Reserves under control of Shire of Manjimup	6.5.4	D2.4	change	* proposal to add Camfield to the Park dropped	* strong opposition from Shire of Manjimup and local groups	F
			addition	* enlarge area of Windy Harbour reserve	* ensures rubbish dump lies within Windy Harbour reserve	F
Log Road Access	6.5.5	D7.4	change	* Preston Road to remain open to log trucks	* submissions drew attention to impacts of existing prescriptions, namely, clearing of other areas of forest to facilitate log haulage	B

ISSUE	RELEVANT SECTION OF DMP AND SPS	RELEVANT SECTION OF FINAL MANAGEMENT PLAN	DEGREE OF REVISION	SUMMARY OF CHANGES MADE	REASON FOR REVISION	RELEVANT ASSESSMENT CRITERIA #
Fire	6.5.7	D6.1	modifi-	* re-ordered and	* clarifies management	D
			cation	categorized	direction	
			addition	* no flight lines for ignition in coastal areas extremely susceptible to erosion	* number of submissions drew attention to fragility of this landscape and its susceptibility to erosion if frequently burnt	B
			change	* regenerating karri treated in the same way as the surrounding forest	* number of submissions drew attention to damaging effects of additional protection (eg. clearing fire- breaks)	B

an explanation of the codes is given in the preceding text

STATISTICAL SUMMARY OF SUBMISSIONS

Number and Origin of Submissions

Submissions were in two forms: letters from individuals, groups and Government departments; and 'pro-forma' letters organised by local interest and recreation groups.

The number of submissions in each category were:

1. Substantial submissions and letters	191
2. Pro-forma letters organised by:	
Keep Our Coast Open (KOCO)	823
Broke Inlet Fishermen's Association	31
Subaru and Northside Double-Diff 4WD Clubs	53
	<hr/>
TOTAL	<u>1 098</u>

Appendix 1 provides a complete list of submitters.

The issues raised by each of the groups and the support they received were:

	<u>Support</u>	<u>Disagree</u>
1. KOCO		
. power boating on Lake Jasper	812	11
. pastoral lease security of tenure	820	3
. hut owner security of tenure	821	2
. opposition to Broke Inlet Marine Park proposal	820	3
. use of Yeagarup dunes for recreation	813	10
. access to reef fishing areas	822	1
. relaxation of horse-riding conditions of use	819	4
2. Broke Inlet Fishermen's Association (all proformas supported the following points)		

- . vesting of Broke Inlet Reserve 19787 in the Manjimup Shire Council
 - . expansion of Broke Inlet Reserve 19787
 - . opposition to Broke Inlet Marine Park proposal
 - . hut owners to be granted some form of tenure
3. Subaru and Northside Double-diff 4WD Clubs (all proformas supported the following points)
- . 'all tracks remain available to the 4WD members of the public'.

The proportion of substantial submissions prepared by individuals and various organisations is shown by the chart below:

Most substantial submissions originated from the region or the metropolitan area:

Submission origin	Number of submissions
Local*	65
Metropolitan	93
Other W.A.	31
Other	<u>2</u>
TOTAL	<u>191</u>

* From within 'System 2' as defined by the Conservation Through Reserves Committee (CTRC).

Each section is preceded by the number of substantial submissions that addressed each particular issue.

SUMMARY OF PUBLIC SUBMISSIONS

General Comments and Recommendations

Many submissions commended the planning team for their efforts. Typical comments were:

- . '(an) impressive attempt to bring order and commonsense to a mass of conflict'.
- . 'congratulations on a comprehensive plan (that is) clear and logical (in) structure'.

Others praised the plan as:

- . 'highly informative'.
- . '(an) overall balanced (plan) that should go a long way towards satisfying the many differing needs of user groups and individuals.
- . providing 'a good balance considering the variety of conflicts and vested interests'.

Despite the words of praise, however, support for the plan was largely conditional.

Public Input and Recreation Opportunities

Many subscribers appreciated the opportunity to comment, but felt that:

- . their comments on 'A Strategy for Management Planning' had not been given a fair hearing, or had been disregarded or omitted, particularly if the content of their submission was not compatible with National Park Policy.
- . the opinions of current users of the Parks had not been sought during plan compilation.
- . 'traditional' users and uses and locals 'needs' had not been given adequate consideration.
- . to a degree the plan reflects the personal bias of the planning team;
- . the time period for comment was too short.
- . the plan is too conservation-orientated.

As a result, locals suggested that:

- . '(the) excessively restrictive policies may result in negative reaction from the community'.

- . ' (we) are not going to adhere to the request for co-operation in the management of (these Parks) '.

In contrast to these perceptions of not being given a fair hearing, others felt that:

- . too much weight was given to (mainly local) proforma submissions.
- . local pressure groups are having their own way to the extent where long term values are compromised.
- . too much emphasis has been placed on active recreation;
- . it is difficult to recognise any conservation orientation.
- . there are no areas of minimal use.

Associated recommendations were:

- . manage first and foremost for conservation.
- . policies should allow a wider range of traditional recreation activities.
- . the area should be managed only for recreation consistent with conservation not equity.
- . zone and manage for various recreation activities.

Other, more general, recommendations related to recreation opportunities were:

- . recreation experiences should be considered and provided eg. from informal, low-impact to formal, high impact.
- . a regional study should be carried out to determine opportunities in the south-west, usage and possible future development.
- . if appropriate, include a private development proposal for a health centre in the final proposals.

The National Park Concept

Short-comings of the DMP were considered to reflect a lack of 'political direction':

- . 'the NPNCA ... provided no explicit basis (and) no public statement on the value of national parks to guide departmental staff in promoting the proposed National Parks to the community and, in particular, to those affected by their creation (who generally reject such proposals) .

'Therefore, unofficial promotion of the national park concept is urgent and would indicate that nature conservation is being well served from an expanded professional base ... In contrast to this situation CALM has no difficulty in promoting or justifying its forest management'.

It was suggested that minority user groups may be disadvantaged by the application of the national park concept to existing uses.

The urgency to give direction to local Government bodies in districts where major reserves exist was also stressed. It was felt that this would dampen anti-park propaganda.

Policies and Prescriptions

Some submissions indicated that, in many areas, the plan failed to implement policies via stated prescriptions. Examples given were:

- . allowing horses in the Parks.
- . building unnecessary roads through sensitive areas.
- . allowing harvesting of resources.

It was suggested that this had resulted from pressure from the community, and in particular, 'traditional' users.

Other short-comings were perceived to be:

- . the plan's inability to provide Shannon Park with security of tenure (see Declaration of Shannon Park as National Park);
- . a 'feeble' CALM Act;
- . that many proposed activities are incompatible with preservation of the ecosystem and inconsistent with the national park ethic - 'to be protected from all interference other than essential management practices'.

Declaration of Shannon Park as National Park (D2.1 National Park Status)

63 submissions received.

A large number of submissions strongly urged that the entire area addressed in the plan be immediately given national park status, to provide it with security of purpose. Submitters argued that:

- . unless such legislation is enacted, the Parks have no security of tenure nor are they protected from logging or mining.

- . the DMP does not satisfy either National Park Authority (NPA) management policy or recognised definitions of national parks.
- . until the area is secured it will 'remain a timber reserve in the eyes of those engaged in exploiting that resource'.
- . adequate protection for the karri areas is of utmost importance and long overdue.
- . unless declared, the Park's values will be compromised.
- . if the area is important enough to be managed 'as if it were a national park' then it should be given the protection it deserves.
- . assurances that the area will be managed as a national park are totally inadequate.
- . declaration of the area is in the best interests of the State.
- . declaration is important for preservation of Broke Inlet as well.
- . the status of forest park is totally inadequate.
- . 'the lack of conversion to National Park status is deplorable'.
- . 'clearly the decision (to not declare area) is political ... and designed to pander to the demands of the timber production lobby'.
- . 'I find this abhorrent and (it displays) a complete lack of sensitivity for conservation'.
- . the promise of Government should be fulfilled.
- . as it stands 'an environment for doubt and mistrust exists in terms of management priorities and long term tenure'.
- . declaration will protect the karri forest from vested commercial interests and short-sighted, unconcerned people.

Furthermore, respondents claimed that:

- . the forest is one of few still in a 'natural' state.
- . the karri forest 'represents one of the great botanical associations of the world' and provides habitat for a large range of fauna.
- . the area will undoubtedly become a tourist asset of both national and international importance.
- . the DMP does not explain why Shannon Park will not become national park.
- . the area is on the Register of the National Estate and is thus recognised as part of Australia's heritage.

Associated recommendations included:

- . take immediate steps to have the Shannon River Basin declared a national park.
- . accord the area security of tenure consistent with all class A reserves.

- . vest the Shannon River Basin in the National Parks and Nature Conservation Authority (NPNCA).
- . if not declared National Park then give an explicit undertaking that all legislative and management advantages accorded a National Park are provided for the Shannon.

Those with recreation interests in the area questioned the necessity of dedication as national park 'because of the restrictions it will bring'.

Recommendations were:

- . reconsider the 'desirability or suitability (of having) this extremely large linear park dedicated' as it will restrict private development opportunities.
- . dedicate only those areas of significant value.
- . declare the entire area for recreation.
- . zone for various types of activities to reduce conflict between users.
- . do not dedicate as national park until a detailed land use study of the lower south-west is completed.

General Recommendations

74 submissions received.

Some very broad recommendations were received, some of which are beyond the scope of the plan. These were:

- . to amend the Mining Act to require Ministerial approval for a mining lease outside the south-west land division.
- . produce a separate document outlining common policies and philosophies regarding management of reserves, titled 'Principles of Management Planning on CALM Lands'.
- . nominate the Parks as a Biosphere Reserve to UNESCO and manage in accordance with Biosphere Reserve principles i.e. core conservation areas with surrounding buffer zones.
- . manage surrounding Crown land as a buffer zone compatible with the nature of the Parks.
- . obtain the services of an 'independent adjudicator' and/or a clear EPA determination regarding vesting issues and make these reports available to the public.
- . give the Institute of Foresters recognition for initiating moves to have the area reserved.

- . remove 'national' from plan.
- . treat all operations in the first five years with caution to avoid irreversible damage.
- . give attention to correct naming of coastal regions and places.
- . make retention of the area as 'wilderness' a priority.
- . ban bottles and cans in most areas.
- . provide circular parking.
- . provide for dogs under control on specified beaches.

Omissions

One 'serious' omission drawn to the department's attention was that the DMP does not recognise that the existing D'Entrecasteaux National Park, and proposed extensions, are and will be reserved for the dual purpose of national park and water. As such, the plan was considered to be incomplete and unacceptable by the Water Authority of Western Australia (see also 6.2.3 Water Resources).

Related to this was the omission of the Public Works Department submission on 'A Strategy for Management Planning' which advised of potential dam sites and catchments within and adjacent to the Parks as well as 'data on potentially divertible freshwater resources and regional significance'.

Other omissions were:

- . a failure to consider zoning as recommended in 'A Strategy for Management Planning'.
- . any mention of management co-ordination with the adjacent Walpole-Nornalup National Park.

The Shannon Park and D'Entrecasteaux National Park Brochure

Some submissions were entirely based on the brochure while others included it in their general comments, praising its presentation and content. The use of 'appropriate', however, was considered to be unqualified and open to suggestion.

Some concerns about the brochure's content were raised. These were:

- . that Broke Inlet is shown as being ideal for canoeing and sail-boarding when its size and unpredictable weather can make it treacherous.
- . that not all rivers are canoeable, but are marked as such.

2.0 BACKGROUND

2.3 THE CONCEPT OF NATIONAL PARKS AND NATIONAL PARK MANAGEMENT

3 submissions received.

One submission expressed disappointment at the 'apparent acceptance' of a national park definition that was 'near enough'. Definitions accepted by the Council of Conservation Ministers (CONCOM) and the International Union for Conservation of Nature and Natural Resources (IUCN) were accepted as adequate, however, it was pointed out that national parks are protected by legislation and as such have 'strong constraints on manipulation of natural environments'. With few restraints on recreation in the Shannon Park and no security of purpose, the area would probably only rate as a 'Multiple Management Area' under IUCN guidelines.

Another submission supported the concept of management, but felt it should not be 'loosely' applied to large areas as 'a convenient means of protection without full consideration of traditional activities, existing or future land uses or without the capacity to properly manage the areas'.

Related to this was a recommendation to declare only small areas of national park around areas of national significance with the balance set aside for conservation or recreation and managed accordingly.

Another submission recommended that the two Parks, essentially two different kinds of reserved areas, have individual management plans to cater for variances in the vested authorities' policies and objectives.

Specific support was received for the recreational management guidelines, with section (vi) regarding opportunities for education and interpretation being commended.

In contrast, item (ii) 'activities should not replicate those easily available in nearby areas' was considered inappropriate under a classification of 'flora, fauna and landscape'. A change in purpose to 'production priority' was recommended.

Others believed a change in purpose was necessary to permit access on horse-back.

2.5 REGIONAL CONTEXT (A3.0 The Regional Context)

Only one submission specifically addressed this section, although more general references were made to recreational opportunities (or perceived lack of opportunities) in the region. These have been addressed in those sections which deal with recreational interests.

An absence of 'low cost or low key' accommodation facilities prompted a request for such facilities in the Broke Inlet area.

3.0 PARK DESCRIPTION

3.4 BIOPHYSICAL BACKGROUND

3.4.4 Geology (B4.2 Geology)

1 submission received.

The description of the Parks' geology was described by a mining interest group as poorly written and an inaccurate reflection of the geology of the Parks, particularly in light of its immense mineral potential.

A number of possible mineral sites were listed.

3.4.8 Vegetation (B4.6 Vegetation)

2 submissions received.

Reference was made to a large number of mis-spellings, typographical errors and omissions in this section of the DMP. A list of 'rare, geographically restricted and poorly collected species of plants that might occur in or near the area' was provided.

One submission considered the vegetation description in (ii) Forests and Woodlands Associations, difficult to reconcile 'with results of the assessment carried out in the lower Shannon and Pingerup Plains area'.

3.4.9 Flora (B4.7 Flora)

3 submissions received.

Reference was made to a number of inaccuracies and omissions and recommendations made for improvement to the section as follows:

- . make reference to Appendix B.
- . add type of location and vegetation type information available from the Forest Department 1985 Bulletin 94, Appendix III.
- . add names of species to either text or maps indicating 'locations or rare or restricted species (confirmed)'.
- . add a prescription to ensure that any development works will be preceded by surveys for rare and restricted plants.

3.4.10 Weeds and Exotic Plants (B4.8 Weeds and Non-native Plants)

1 submission received.

The Agriculture Protection Board (APB) recommended the inclusion of the following in the final plan:

'Declared and Exotic Plant Species

This group of plants includes those introduced with the advent of European settlement. Though many of the plants have only localised distribution, some of which are confined to the sites of introduction, other species have become widespread throughout.

'In the interests of protecting agricultural and other properties which are free of declared plant species, the management programme will have emphasis on preventing the intrusion of such species on to property outside the Parks, as well as implementing other control work as necessary within the Parks.'

3.4.11 Fauna (B4.9 Fauna)

1 submission received.

Reference was made to omissions and inaccuracies, as well as the need to adequately document fauna in the area.

4.0 PARK USE

One general comment was made regarding the lack of use of surveys or

figures to provide a basis for management, i.e. visitor origin, numbers of users.

4.3 PRESENT USE (B9.1 Levels of Use)

While only one submission specifically commented on this section of the DMP, a number of others indicated that the Parks should remain 'overwhelmingly recreational in nature'.

5.0 OBJECTIVES

9 submissions received.

5.1 OBJECTIVES FOR SHANNON PARK AND D'ENTRECASTEAUX NATIONAL PARK (C2.0 Management Objectives for the Shannon Park and D'Entrecasteaux National Park)

Generally principles were supported, however, there was some concern about an absence of 'values' statements and incomplete policy development. A 'contradiction' between conservation or preservation principles while catering for public demands was also cause for concern. These alternative objectives were proposed:

1. To preserve the ecosystem for its inherent value.
2. To preserve particular plant and animal species.
3. To provide for scientific observation and education.

5.2 OBJECTIVES FOR THE PERIOD OF THE PLAN (C3.0 Objectives for the Period of the Plan)

Some supported these objectives, although concerns were raised that many of the prescriptions 'reflect short-term political and economic compromises, many of which may be irreversible'.

One submission referred to a need for public co-operation. Another submitted that to 'develop and foster' public involvement was commendable but somewhat unrealistic.

Additions proposed were:

- . To complete reservation of the D'Entrecasteaux National Park and The Shannon National Park under Section 29 of the Land Act. (See also Declaration of Shannon Park as National Park.)

- . To discontinue grazing leases and rehabilitate as soon as possible.
- . To recognise the presence of private enclaves and acquire as they become available.

Listing the objectives in priority was suggested for consistency.

6.0 DISCUSSION AND PRESCRIPTIONS FOR PARK MANAGEMENT

6.1 INTRODUCTION AND METHODOLOGY

11 submissions received.

6.1.1 Introduction (D1.1 Introduction)

Concerns were raised that the plan 'generally fails to rely on preservation of nature values as a basis for decision making' and that the concepts of 'equity' and 'the capacity of the managing authority' are inappropriate analytical tools.

(i) *Capability*

The principle received support, but generally feelings were that:

- . while it is necessary and pertinent it is not sufficient criterion for determining appropriate human use, i.e. inappropriate use should not be promoted on the grounds that it will cause little or no damage.
- . changes in technology should not be reason for bowing to pressure.
- . capability and equity are incompatible.
- . the future cannot really be forecast.

(ii) *Equity*

Again the concept received some support, but was generally considered inappropriate or poorly applied for the following reasons:

- . no conflict exists between existing permissible uses.
- . 'it (is) an invalid simplification of the issues'.
- . national parks have a 'limited range of appropriate and acceptable uses' and the over-riding use should be conservation of natural resources.

- . the concept contradicts that of capability.
- . compromises have been made for the sake of 'traditional' users.
- . locals have not been given a 'fair go'.
- . numbers of users have not been considered.

(iii) *Capacity for Management*

This concept was accepted as appropriate, provided it is not considered in isolation. Support for monitoring proposals was also received.

It was mentioned that:

- . the capacity for management may change with changes in behaviour through information programmes;
- . inappropriate Park use should not be ignored or condoned on the basis that little can be done about it if management resources are limited.

6.2 BIOPHYSICAL RESOURCES

6.2.1 Flora (D4.0 Flora)

11 submissions received.

There was some concern that proposals put the Park visitor before natural processes which 'should be encouraged and protected from users'.

It was considered that management of native flora can and should be separate from management of introduced plants. The meaning of the word 'exotic' plant was queried, i.e. is it a non-local species or anything that is not native?

It was proposed that 'any development in the Parks which might affect natural or native vegetation should be preceded by surveys for rare and retriected species and their habitats'.

Prescriptions

1. Rare and fragile plants and communities. This prescription gained support. Some minor editorial changes were suggested.

2. Slightly disturbed plant communities. General support for the prescription was received as was specific support for the proposal to isolate areas with large fuel loads.

Requests for more details on, and suggestions for, evaluation of expected impacts were also received.

Map 11 was considered to be misleading because it did not distinguish between wildfires and prescribed burns.

The issue of Aboriginal management brought comments such as:

- . the Aboriginal influence was short-term relative to ecological origins and is therefore inappropriate.
- . no scientific information concerning Aboriginal fire management exists.
- . no evidence that Aborigines occupied the main karri forest exists, only the periphery.
- . there is no consensus regarding management practices used.
- . fire should only be used for an end-purpose, i.e public safety or to promote a desired species;
- . management proposals do not allow for the occurrence of natural processes.

3. Other areas. Some submissions offered full support for this prescription while others had reservations about special management 'required' for public use areas, visitor safety and control of disease and introduced animals. Encouragement of natural processes and restrictions of visitor use and access were suggested.

4. Introduced species. Again some submissions fully supported the prescription, however, not all were convinced that alien plants could 'perform a function that is necessary within a natural system and which cannot be performed by native plants'. For example, the use of spinifex for dune stabilisation, was preferred, by many, to the use of marram grass (*Ammophila arenaria*).

6.2.2 Fauna (D5.0 Fauna)

12 submissions received.

The fauna prescriptions were generally well supported. Reference to the importance of long unburnt habitats was commended by one and dismissed by another as incorrect. The relationship drawn between low intensity fires and absence of some native fauna was described as 'absolute nonsense'.

Relocation possibilities for the Noisy Scrub-bird (*Atrichornis clamosus*) also received support.

The reference to 'hunting' was queried, as this activity is forbidden in national parks.

Prescriptions

Only those prescriptions that received comments other than support are addressed.

2. Efforts to re-introduce indigenous fauna was supported provided:
 - . indigenous means local.
 - . proof exists that the animal(s) once occupied the area and their re-introduction will not upset the existing balance.
4. Permitting natural processes to occur without hindrance was supported, although there were reservations about the exceptions.
6. Research was supported, provided that communities and their components are not adversely affected by the activities.
7. The issue of inland fishing brought mixed reactions, ranging from full support to conditional support - provided that more than one water body is kept free from fishing and no fishing occurs at Lake Maringup and surrounding wetlands - to opposition to any inland fishing.
8. While few submissions directed comments specifically to the issue of harvesting of native fauna, support for such an

activity was apparent. Others, however, strongly advocated no harvesting, no exceptions.

6.2.3 Water Resources (D3.2 Water Resources)

9 submissions received.

Comments on this section of the DMP were varied. They included:

- . a recommendation for ecological studies of Lakes Jasper and Maringup before final decisions are made about surrounding land use.
- . a recommendation for investigation of the effects of windsurfers in shallow water.
- . a query about attempts to limit surface runoff pollution from agricultural sources.
- . recommendations that Lake Maringup be given special protection as an area of high conservation status.
- . recommendations to give adequate recognition to the importance of water resources.

The Water Authority was particularly concerned that the hydrological significance of the area was not addressed despite earlier recommendations. The Authority again stressed the need to address potential water uses other than in an environmental context.

Prescriptions

All prescriptions for water resource protection received full support. Only prescriptions 5 and 6 received further comment. Additional recommendations regarding the protection of Lake Maringup were also made.

5. In addition, it was recommended that recreational use of Lake Maringup should not be facilitated or permitted.
6. Regarding 'recreational use of "other" water bodies', the names of those bodies affected were requested.

Opposition to banning of power boats was received, although 'no power-boat use' of Lakes Maringup and Quitjup was accepted. Support

for no power boating at all was also received (see Section 6.3.8 Boat Use).

One submission perceived that permission to use power-boats where there are 'other factors' of overwhelming importance would include permission for use of boats by professional fishermen, but not amateurs.

6.2.4 Soil Resources (D3.3 Soil Resources)

6 submissions received.

The prescriptions were supported and suggestions made for additions such as:

- . taking account of the high risk of erosion associated with road construction activities.

Further suggestions are listed below.

Prescriptions

1. Suggestions for minimising impacts on soils were:
 - . avoid facing beach access routes towards prevailing winds.
 - . that CALM personnel take more care during any dune-burning operations to avoid a repeat of events such as the Meerup fire.
2. More thorough assessment of the mobile Yeagarup dunes was recommended.
3. In particular, rehabilitation of the limestone quarry visible from Windy Harbour was recommended.

6.2.5 Landforms and Geological Features (D3.1 Geological Features and Landforms)

7 submissions received.

Both policies and prescriptions were well supported. Some further recommendations were made and concerns expressed regarding specific prescriptions as follows:

Prescriptions

1. Promote the basalt columns as a special feature, unless there are good reasons why the feature should not be promoted.
2. Restriction of access to Doggerup Dune would restrict access to a 'traditional' fishing spot.
3. Do not provide vehicle access to the beach. Provide only two access tracks to Point D'Entrecasteaux as follows:
 - . upgraded track and walk trails as proposed
 - . 2WD access along Salmon Beach Track via a bypass road.
5. Close mobile dunes to vehicles and monitor movement of the Yeagarup Dunes.
7. Remove huts from the northern face of Callcup Hill. (See 6.4.1 Private Use - Squatters' Shacks).
8. Interpretive brochures should be of good quality and technically accurate.

6.2.6 Summary of Conservation Opportunities (B10.0 Conservation Opportunities)

Only two submissions commented on this section. One suggested that Map 12 (significant and fragile natural features) was misleading as it 'ignores prescribed burning'. The other considered the lack of mining industry input to be a fairly serious omission.

6.3 RECREATION

The issue of recreation and 'traditional' uses brought by far the greatest response. Comments ranged from perceived 'rights' of 'traditional' users to continue activities virtually unrestricted, to the belief that 'traditional' activities should not be allowed to continue at the expense of the environment.

6.3.2 Levels of Use (D9.1 Levels of Use) 4 submissions received.

In response to the phrase 'a common tendency in park management is to respond to increasing visitor demands by either upgrading existing areas and facilities or by providing new opportunities', the view was expressed that 'a common tendency ... is to restrict or close access to various ... areas (especially to 4WD activities)'.

Increased demands with increased tourism as the area becomes better known, was felt to be inadequately addressed.

6.3.3 Vehicle Access for Recreational Purposes (D7.1 General Access)
68 submissions received.

The issue of access, particularly to 'traditional' recreation sites, brought the greatest response of any single issue.

The policies and prescriptions were supported by many, including the Karri/D'Entrecasteaux Regional Advisory Committee, considered to represent a broad spectrum of interests, and a 4WD association representing a number of clubs. The 4WD organisation also requested occasional access by permit to those tracks designated for closure in the Shannon Basin.

Specific support was received for proposals to:

- . upgrade the track to Black Point - signs were also recommended to advise users to keep to track, not to litter and so on.
- . close the road from Coodamurrip Beach to West Cliff Bay.
- . upgrade the track to Banksia Camp.
- . upgrade Summertime Road to 2WD access.
- . upgrade access to Salmon Beach.
- . upgrade access to Jasper Beach.

One submitter thought it 'illogical' to close most roads in the lower, rather than central Shannon because the latter is more sensitive.

Careful planning of roads to minimise visual and landscape disturbance was recommended.

Many submitters expressed opposition to the use of vehicles on beaches and dunes. Concern was also raised about upgrading of tracks to improve access particularly through sensitive areas. Controlled pedestrian access through dunes was also recommended.

Problems associated with conventional car use were considered to be inadequately addressed.

Prescriptions

1. A number of submissions opposed any access beyond that proposed while others recommended greater restrictions. Specifically:
 - . close all tracks not consistent with proper maintenance and restoration.
 - . keep some areas, including beaches, undisturbed.
 - . keep at least half the coast free from disturbance.
 - . limit access to the Park periphery.
 - . reduce vehicle access and convert tracks to walk trails.

Their reasons included:

- . encourage users to experience the Parks first hand.
- . recreational areas with high levels of use are either over used or in danger of becoming over-used.
- . retention of some routes is in contravention of policy, i.e. that access to the area is necessary and the resultant environmental effects minimal.
- . many access roads pass through areas containing rare or restricted species of flora, affected or at risk of infection by dieback, categorised as 'least disturbed', of high to extreme erosion susceptibility or are potential wilderness.
- . policy states that roads should avoid areas with high conservation values, erodable soils, or poorly represented or fragile plant communities.
- . motor-vehicle use is incompatible with Park values.
- . there is a tendency to create new tracks when the existing one becomes impassable.
- . management should aim to preserve the physical and intrinsic values of the Parks.
- . limited access will assist in keeping the area free of litter and disturbance.
- . 'speed (and) seeing it all' are inappropriate.

- . it is not possible to experience wilderness/remoteness with roads never more than 5 km away.
- . the plan is too vehicle-based.
- . no good reasons have been given for retention of certain access routes.

Specific road closure recommendations were:

- . Yeagarup Track.
- . Warren Beach Track.
- . Summertime Road.
- . Salmon Beach Road.
- . Mandalay Beach Road extension.
- . Chesapeake Road east of Deeside Coast Road.
- . the track around Lake Jasper.
- . Mandalay Beach to Banksia Camp Track.

Alternative routes to the following locations were recommended:

- . to Lake Jasper - extend Jangardup Road to provide 2WD access.
- . to Jasper Beach - provide a route south from Lake Jasper.
- . to Black Point.
- . to Warren Beach - improve access to reduce pressure on Yeagarup Beach. Assistance in determining the realignment was offered.

Those opposed to any road closures contended that:

- . the area is public property and therefore CALM has no right to close access routes.
- . proposals will reduce 4WD recreation areas.
- . restrictions are unreasonable considering that the only 2WD access to beaches will be at Windy Harbour and Mandalay Beach.

Opposition to the upgrading of specific tracks was also received. Specifically:

- . to Black Point, as upgrading would - 'destroy the remoteness and rugged isolation of the area', result in a greater number of visitors and associated litter, lead to

noise and overcrowding, and fail to satisfy the needs of 4WD enthusiasts.

- . Mandalay Beach Road to Banksia Camp. Recommendations were to retain as 4WD access to satisfy the needs of 4WD recreators, and relocate 'to follow level gradients' and create a safer, low-maintenance track.
- . Scott Road to Lake Jasper. Recommendations for further access included 2WD access from the lighthouse to 'Anvil' with provision for a tourist bus turn-around, and extend Jangardup Road to Black Point.

Most submissions advocated retention of access to various traditional recreation spots. These were:

- . Broke Inlet.
- . Yeagarup Beach.
- . the east and west sides of Black Point, including Jasper Beach.
- . 4WD access along Scott Road from the Donnelly River to Lake Jasper.
- . marron fishing spots (December to April) - Gardner River downstream of Chesapeake Road bridge, Blackwater Creek and Swamps via Lower Gardner Road and River Road, western Blackwater Swamps via track off Tragedy Track, via Pingarup Road, via Marron Road, via Dog Road, via O'Sullivan 12 Road and via unnamed road east of loc. 10566 on Deeside Coast Road.
- . reef-fishing spots between West Cliff Point and Banksia Camp.

Supporters of continued access, particularly to reef-fishing spots between Mandalay Beach and West Cliff Point, advocated that:

- . there are few reef-fishing alternatives and none as safe.
- . the area provides safe, all-weather fishing.
- . reef-fishing is an ideal, passive recreation.
- . the area is accessible to elderly and disabled persons.
- . the track to Tucket's Hut is stable and provides spectacular views as well as opportunities to see fauna in a natural environment and for nature appreciation, study and photography in a unique and safe environment.

Other access routes recommended for retention were:

- . 4WD access around Lake Jasper.
 - . 2WD access to Jangardup Road.
 - . Banksia Camp, to Red Rock (2WD), to Bottletops with access to Bottletops by permit.
 - . the interdunal track from Windy Harbour to the mouth of the Gardner River, until Tragedy Track, which is currently subject to periodic flooding, is upgraded to an all-weather track.
 - . firebreak and management track access by permit.
2. Closure of unused roads was generally supported.
 3. Use of 'local' native vegetation was recommended. Rehabilitation of duplicated and closed tracks was supported.
 4. Securing public access through private property received little comment. One submittor agreed in principle, while advocating purchase of the private enclaves as a solution.

The owner of the property through which Summertime Road passes recommended relocation of the Road south to high ground where water-logging would not be a problem.

6.3.4 Vehicles Off-Road (D9.2 Vehicles Off-road)

38 submissions received.

Both support and opposition to the proposals were received, with submitters apparently sharing a common concern for the environment. Many were pleased that dune-buggies, mountain-bikes and other 'off-road-vehicles' would not be permitted 'off-road'.

A number of submitters with 4WD vehicles were concerned about 'misrepresentation', of both their activities and their regard for the environment. Comments included:

- . 4WD clubs have a 'strong conservation philosophy' and strict code of ethics enforced by individual clubs.
- . 4WD activities are mainly 'environment-orientated' rather than 'vehicle-orientated'.

- . 4WD club members are responsible and concerned.
- . only 'modified' vehicles can drive cross-country, however, the terrain in the Parks does not lend itself to such activity.
- . dune-buggies are things of the past.

Other issues raised were:

- . no suitable alternative areas exist.
- . if all 4WD tracks are closed, then Section 56(1) (c) of the CALM Act is not being fulfilled.
- . a change in policy is required to allow recreational use of the Yeagarup Dunes.
- . damage to introduced marram grass on the coast is not a valid argument for banning off-road activities.
- . there is public demand for 4WD recreation.
- . 4W driving provides adventure, excitement and opportunity to experience a sense of remoteness.
- . strict policing is required, particularly for specially-built off-road vehicles.
- . there is no provision for staff or resources to facilitate proper regulation.
- . the growth in 4WD recreation and CALM's ability to cope with this growth have not been addressed.

Prescriptions

1. The proposal to not allow off-road activity received a reasonable level of support, although control of the activity was considered to be 'unrealistic' given that it would be impossible to police.

Use of the Yeagarup Dunes for vehicle recreation gained much attention. Proposals on one side included:

- . no recreation on the Dunes should be allowed.
- . actively discourage use with signs, barriers and information.

On the other side:

- . allow 4WD and dune buggy recreation on the Dunes.
- . zone part of the Dunes for recreation.
- . allow 4WD on Dunes for access only.

- . define access route to control vehicle use.
- . allow recreation provided no damage to Dunes is possible.
- . no attempts should be made to stabilise the Dunes.

Advocates of vehicle recreation on the Dunes argued that:

- . no logical reason has been given for disallowing activity.
- . use of the Dunes for recreation will alleviate pressure on the vegetated areas.
- . no official off-road vehicle recreation area exists south of Lancelin, but there are thousands of tax-paying off-road drivers.
- . locals have not been given a 'fair go'.
- . the Dunes have no significant value.
- . dune buggy racing is a 'popular and keenly contested sport'.
- . access across the Dunes will save on road-making costs.

Opposers of vehicle recreation on the Dunes stressed that:

- . the Dunes are subject to erosion.
- . the Dunes comprise fragile communities.
- . dune movement has increased with increased traffic in recent times.

2. The proposal to define special access corridors, where necessary, was considered too vague and its deletion was suggested. Disagreement was also registered.

6.3.5 Recreational Ocean Fishing and Beach Access (D7.2 Coastal Access)

32 submissions received.

Opposing views regarding vehicle access to beaches were received. An association representing many 4WD clubs applauded 'the sensible, underlying philosophy and policy'. Similarly, an Anglers Association described the prescriptions as 'sensible and sufficient for their needs'. The Karri/D'Entrecasteaux Regional Advisory Committee also endorsed the prescriptions, but proposed special consideration be given to avoiding disturbance of birds nesting at the mouths of the rivers.

In contrast, recommendations to restrict vehicle access, place stricter controls on vehicles and set a long-term goal of no beach access for any vehicles, were received.

The issue of fishing also attracted comment. Retention of amateur fishing in Broke Inlet was requested as was continued access to reef-fishing spots (see Section 6.3.3 Vehicle Access for Recreation Purposes). The practice of net-fishing in rivers within the D'Entrecasteaux National Park was viewed with concern. Opposers to fishing in the Parks argued that all fauna should be protected.

Prescriptions

1. Retention of beach access received both support and opposition, with opposers calling for restrictions. Specific recommendations were:
 - . leave Warren and Summertime Tracks open, but phase out use.
 - . do not reinforce accessibility by making provision for camping.
2. Many submitters were concerned regarding vehicular use of beaches. The issues of equity, appropriateness and servicing of recreational 'needs' were raised.

Some submitters could see no reason for closing the beaches once upgrading of tracks was complete, given that:

- . the areas are away from popular areas
- . 'no great crowds could possibly occur'.
- . most 4WD owners currently use the beaches.

A request was also made to allow 4WD access between high and low water mark on Jasper and Salmon Beaches until 2WD access is provided. Another requested that only foot access to the two beaches be permitted for the following reasons:

- . vehicle use of beaches is not consistent with NPA management guidelines and policy.
- . the proposal is contrary to the aims of national parks in terms of both IUCN and CONCOM definitions.

- . the presence of vehicles on beaches and associated noise destroys the 'wilderness experience' of other users.
- . vehicles pose a threat to wildlife.
- . little consideration has been given to 'equity' for beach-walkers.
- . it will be difficult to police vehicle activity to ensure adherence to restrictions.
- . it is unacceptable that most beaches are open to vehicles;
- . vehicles are a potential hazard to beach-walkers.
- . passive, non-consumptive recreation should be encouraged.
- . allowing vehicle-based activities encourages inappropriate behaviour.
- . associated problems include litter and environmental damage.

Areas of particular concern and recommended for closure were:

- . between Donnelly River and Yeagarup Track.
- . Doggerup Beach.
- . Coodamurup Beach, as a track leads to the very fragile Lake Maringup area.

3. Again no vehicle use of beaches was advocated. The difficulties of policing were also noted.
4. Suggestions related to the corridor proposal were:
 - . vehicle use should be subject to a beach users' survey.
 - . restrict vehicle access to 1 km either side of access points.
 - . no vehicles near swimmers.
 - . post 'no entry' signs and introduce fines for offenders.
 - . do not allow vehicles on beaches.
5. Monitoring of the biophysical effects of vehicle use was 'welcomed as a very necessary precaution'.
6. Surveys of beach users were supported. Further suggestions included:
 - . a specific survey of walkers.

- . observe effects of prescriptions over the next three, rather than five years.

6.3.6 Horse-riding (D9.3 Horse-riding)

44 submissions received.

The issue of horses in the Parks and horse-riding conditions received considerable comment with arguments centring on 'traditional' uses, equity, environmental effects and 'appropriateness' of the activity in national parks.

Horse-tour Operations

Support for commercial horse-tour operations came from operators, associates and participants:

- . Shannon Horse-back Adventures operators are 'responsible and environmentally aware'.
- . horses cause minimal or no damage to the environment.
- . few other opportunities exist to 'see and appreciate virgin bush'.
- . horses provide an 'ideal access medium'.
- . organised users 'control' use.
- . the business provides a service to the community.
- . the operation contributes significantly to the development of tourism.

Environmental Effects

Contrary to those who believe that horses cause little or no environmental damage, those who opposed horses in the Parks stressed that:

- . horses are environmentally destructive and incompatible with fragile ecosystems.
- . the horse-riding corridor passes through areas containing rare or restricted flora, poorly represented or fragile communities, that require special protection eg. stable coastal dunes, least disturbed areas, wetlands, and areas susceptible to soil erosion and dieback.
- . regardless of precautions, weeds can still be introduced through the use of dry feed.

- . particular care is needed to control the spread of weeds and disease such as dieback. Horses contribute to the spread of weeds and dieback.
- . no horses should be allowed.

As a compromise one submission suggested that activities should be curtailed until assessment of the proposals is complete.

Those who favoured horse-riding argued that:

- . the D'Entrecasteaux National Park 'has exhibited its capacity to sustain cattle grazing and horse-riding for well over 100 years'.
- . no evidence exists to suggest that horses are more likely to spread dieback than bushwalkers.
- . damage caused by horses is not apparent.
- . erosion attributed to horses has initially been caused by badly-surveyed tracks or over-use.
- . weeds 'supposedly introduced by (horses) could as well be introduced by other means'.
- . weed establishment and success is limited because of poor soil and shade from native plants.

Equity

The notion of equity and a 'fair-go' was also addressed:

- . there is a 'misconception that traditional use confers some special right'.
- . Park management should be consistent with conservation, not equity.
- . there is sufficient State forest in the area for horse-riding.

Horse-riding supporters felt they had been treated 'unfairly':

- . horse tour operators are the only group 'threatened with expulsion (from the) Park for failure to comply with conditions'.
- . tethering and provision of yards is less destructive than provision of camping areas or car parks.
- . the response to evidence of horse damage is restriction of activities, but damage caused by vehicles, campers and walkers is anticipated and actively managed.

- . the potential damage from all forms of use is acknowledged, but only horse-riding is to be extensively monitored and riders obliged to pay.
- . horses damage vegetation only if allowed to do so, bushwalkers also damage vegetation.
- . spread of weeds and dieback and disturbance to fauna results from all forms of use, not only horse-riding.
- . no restrictions have been placed on vehicles or walkers in dieback-affected areas.
- . riders from the general public are only allowed to use 2% of the Park, while commercial operators are allowed to use 5% of the area.
- . 'traditional' use is to be denied.
- . horse-riders are entitled to the same freedom as bushwalkers.
- . if horse-riders are required to obtain a permit, then so should all park users.

General

Both support and very strong opposition to the proposals to cater for horse-riding were received. Opposition was based on the belief that the restrictions were:

- . too lenient.
- . too severe and discriminatory.

Those who considered the prescriptions too lenient stated that:

- . the prescriptions are unacceptable.
- . horse-riding is inappropriate in national parks.
- . horse-riding in the Parks is in contravention of park policy and in clear breach of the CALM Act and is therefore unlawful.
- . CALM may be liable to legal action if horse-riding is allowed.
- . proposals are not policeable.
- . conservation should be first and foremost.

In contrast, horse-riding supporters argued that:

- . there is little justification for restrictions.
- . restrictions are too severe considering the principle of equity and likely number of users, and are over-reactive and discriminatory.
- . conditions are impractical and unacceptable.

- . local depasturage is costly and an unnecessary burden, especially for non-locals.
- . no overnight tethering or yarding effectively prevents most riders from riding in coastal areas.
- . overly severe restrictions 'may lead to blatant disregard' for the national parks.
- . horse-riding is appropriate in wilderness areas according to National Park Authority (NPA) management policies.
- . no park user should be required to obtain a permit.

'Relaxation of conditions' was proposed and requests received to:

- . lift local depasturing restrictions.
- . allow use of old stock routes and various tracks - Old Deeside Coast Road from Nelson Loc. 5273 to 8503, Squirts River Bridge, Lower Gardner Road to Mottrams Lake, and access to Coodamurrup Beach.
- . consider increasing number of corridors.
- . provide additional routes in areas where potential environmental impact would be low.
- . provide horse-riding with the same status as bush-walking.
- . keep Broke Inlet open to horse-riding.
- . recognise commercial horse tour operations as a 'legitimate activity in the coastal region'.
- . consider the 'financial burden' and the effect of controls on the commercial venture's ability to survive.
- . allow access to sand dunes in 'Parson's Paddock', 'Warby's Sand' and 'Cockle Swamp'.
- . allow use of all access tracks unless suitable alternatives are provided.
- . withdraw charges for permits.
- . consider registration rather than permit.
- . if permits are necessary they should be issued on an annual basis.
- . ease conditions of entry.
- . allow organised groups of up to 15 horses guided by people who know the area.
- . provide water and yarding for horses every 15 km.
- . allow overnight camping and tethering.
- . set aside area for tethering at 'Crankers'.

Some offered conditional support for proposals:

- . the corridor concept is acceptable provided adequate access is provided to a variety of locations.
- . no feed with seed is reasonable, but 'approved' locations have not been identified.

It was suggested that horse-riding costs, relative numbers of riders, and the few prepared to be on horse-back for two days or more would ensure that 'over-saturation' would not occur.

Prescriptions

Few submissions referred specifically to the prescriptions.

4. Derivation of the number of horse-days was queried. One submittor 'presumed that ... (it) ... was based on consideration of all factors and hoped that the increase "on demand" will be related to impact assessment rather than public pressure'. Another considered 700 to be arbitrary and too low.

The concept of permit costs to cover impact assessment was considered to be an unacceptable 'open ended arrangement'.

- 7.& 8. A contradiction between prescriptions 7 and 8 was perceived as prescription 7 appears to base any increase in the area open to horses 'on demand', while prescription 8 appears to base the same on environmental considerations.

Monitoring was supported.

6.3.7 Camping (D9.4 Camping)

23 submissions received.

The camping prescriptions were generally supported with particular support given to 'no trace' camping. One submittor claimed that the prescriptions were 'a long overdue authority of a much needed facility'.

Prescriptions

1. The proposal to facilitate a range of camp-site types was

generally well supported, however, one submitter reported concern that the proposal would require a large number of staff and result in a 'mini urban park'.

2. The proposal to charge for discrete camping areas was both supported and opposed. Recommendations included:
 - . keep fees to a minimum.
 - . there should be visible evidence of fee use eg. clearing of camp-sites, provision of refuse bins and firewood.
 - . no fees.
3. Recommendations related to vehicle-based campsites were:
 - . establish a vehicle-based campsite at Broke Inlet as shown on Map 14, but not mentioned in the prescriptions.
 - . rubbish collection from all sites.
 - . no camp-sites at Lake Jasper or Camfield.
 - . delay, or establish only one camp-site at either Lake Jasper or Donnelly River landing, as the two areas are relatively close to each other.
4. Designated discrete camping was generally applauded, although some alternative suggestions were made:
 - . no camping behind foredunes at Yeagarup, Donnelly River mouth, Fish Creek, Black Point, Banksia Camp or Malimup, as national parks should be managed for conservation and beach camping is not environmentally sound.
 - . provide anti-littering signs at Black Point.
 - . provide camping areas with water, toilets and rubbish bins at sites close to the eastern and western sides of Black Point.
 - . provide one or two extra sites behind the foredunes between Warren River and Summertime Road.
5. The concept 'no trace' camping was well received, particularly the guidelines for bushwalkers and canoeists, and the concept of designated camping areas for bushwalkers.
6. A request for a formal caravan park at Camfield was made as caravan parks in this region are far apart.

7. No generators, no exceptions was advocated, however, approval was requested by some for the use of small 'silent-type' generators.
8. Provision of rubbish receptacles was supported.

General suggestions and recommendations were:

- . retain some gravel pits as overnight camp-sites.
- . no new camp-sites should be developed.
- . retain camp-sites established at West Cliff Bay and Broke Inlet Beach.
- . remove the old hut at Banksia Camp.
- . do not impose time restrictions on length of stay.
- . while demand is low, allow 'no-trace' camping throughout the Parks, except in environmentally sensitive areas.

6.3.8 Boat Use (D9.6 Boat Use)

49 submissions received.

Power boat use attracted considerable comment. Concerns, particularly those expressed by local people, centred on use of Lake Jasper and Broke Inlet, with many management proposals made regarding the latter.

Lake Jasper

Many submissions addressed the issue of power boat use of Lake Jasper. The following reasons were given for continued power boat use:

- . power boats provide a measure of safety for windsurfers and canoeists.
- . wash from boats is insignificant compared to waves generated by strong south-westerly wind.
- . the noise is unlikely to annoy anyone because of the site's isolation, and is minimal compared to noise from other sources.
- . initial permission to use Lake Jasper for power boating was given after an NPA environmental assessment.
- . flora and fauna numbers are low therefore risk of disturbance is low..
- . the Lake is large enough to accommodate active and passive use.
- . other areas cater for canoeists and sailors, but no concessions have been made for power boat users.

Strategies, suggestions and requests to overcome the potential problems included:

- . the Lake could be managed so users are made aware of potential problems and precautions can then be taken.
- . zone for various uses.
- . issue permits 'to responsible power boat organisations (for use of) a zoned portion of Lake Jasper ... pending the results of a biological survey of the Lake'.
- . to ensure equity, allow power boat use of hang-gliding area.
- . provide 'sleeper' boat ramp and all-weather access.
- . no additional facilities are required for current power boat users.
- . road upgrading is not necessary.
- . provide 2WD access as proposed.
- . monitor use and modify proposals as required.
- . limit to 150 hp boats.
- . limit to 8 hp boats.
- . make clubs responsible for use.
- . local boating groups and interested persons could be contacted for voluntary assistance to upgrade or provide suitable facilities.
- . power boat clubs could provide a rescue service.
- . allow use of a gazetted area provided the user is a member of a group.
- . apply International Regulations for Preventing Collisions at Sea (IRPCS).
- . allow use provided user agrees to National Park rules and regulations and Harbour and Light rules, and stays within the gazetted area.

Broke Inlet

A number of submitters presumed that boating on Broke Inlet would be subject to the same restrictions as those proposed for the Parks. Requests to permit or not permit power boat use of the Inlet were received. On one hand:

- . closure of Broke Inlet is likely despite public requests.
- . professional fishermen need power boat access.
- . banning of power boats may affect professional fishing in estuarine and ocean waters.

- . allow professional fishing under the control of the Fisheries Department.
- . Broke Inlet is large enough to accommodate all water-based activities.
- . Broke Inlet Beach is only accessible by boat.
- . development of tourism will be stifled if access to Broke Inlet is denied.
- . the environmental damage caused by boats is negligible.
- . it is an ideal recreation area and the only suitable alternative to Lake Jasper.

The same arguments were used to support power boat use of the Donnelly River.

On the other hand:

- . Broke Inlet has areas of extremely fragile, unique and unspoilt beauty.
- . too many power boats lead to a noisy, fume-ridden, rubbish-strewn, eyesore, such as Peel Inlet.
- . ample opportunity for power boating exists elsewhere.
- . phase out commercialisation.
- . allow occasional controlled use e.g. to ferry walking groups or for rescue operations.

Other advice received included:

- . Broke Inlet is not ideal for canoeing and sailboarding as suggested by the brochure because of its size and unpredictable weather. Appropriate warnings are required.
- . the issue of boating on Broke Inlet requires clarification.

Other general comments, recommendations and requests were:

- . permit power boating on Gardner River as - Section 4.3.3 of the NPA management policies permit boating on tidal waters, it is used for scenic trips and for marroning three to four kilometres upstream from mouth, erosion from boat wash would be negligible considering water velocity and levels in winter, and regular flushing will remove any pollution.
- . permit small boats to use the Warren River.
- . place sailing in the same category as canoeing.

- . use of row boats and sail boats has not been addressed.
- . allow power boat use of the tidal sections of the Shannon River.
- . conduct a regional survey on resource availability.

Control and policing capabilities were again questioned.

Prescriptions

1. Management of Lake Maringup as a wilderness area for ecological studies with no recreation permitted was recommended.
No other objections to the use of canoes were received, although a degree of 'unfairness' was claimed by power boat users.
2. Use of power boats only on the Donnelly River received both considerable support and opposition.

Supporters of the proposal reiterated that:

- . power boat use in national parks is inappropriate.
- . only recreation that will not disturb the ecosystem should be allowed.
- . there are sufficient numbers of inlets along the coast to meet demands for power-boat use.
- . power boats create fumes and noise, spill oil and produce a wash which may damage banks.

More specifically:

- . Lake Jasper deserves a high priority in terms of conservation status as it is the largest fresh-water lake in the south-west.

Some offered a compromise, others conditional support:

- . allow power boat use of Lake Jasper.
- . allow use of the Donnelly River with greater controls.
- . the conditions are acceptable provided there is no 'overwhelming public' support to change the guidelines for boat use in national parks.

Supporters of power boat use submitted that:

- . power boat and associated activities are 'traditional'.
- . the prescription is unfair and unjust.
- . any conflict between user groups can be solved by zoning.
- . no reasons have been put forward for restricting power boat use.
- . no alternative inland water body exists within the region, the closest being about 160 km distant.
- . power boat use is allowed in other national parks.
- . 'needs' of locals should be considered.
- . prescriptions are too restrictive, are 'dictatorial, unimaginative and short-sighted'.

3. The proposal not to renew the hang-gliding licence met with approval and disapproval. Many of the arguments, both for and against, are listed under prescription 2. More specific arguments which support hang-gliding are:

- . no conflict exists between hang-gliders and other Park users.
- . no accidents associated with the activity have occurred.
- . no reasonable justification for not renewing the licence has been given.
- . hang-gliders account for the majority of users.

To resolve any conflict that might occur it was suggested that use be allowed during specified periods.

6.3.9 Marroning and Freshwater Fishing

6.3.9.1 Marroning (D9.7 Marroning)

22 submissions received.

Many submissions opposed marron harvesting or advocated tighter controls. One suggested that control of the activity by two departments (CALM and Fisheries) is unnecessary duplication.

The Karri/D'Entrecasteaux Regional Advisory Committee expressed particular concern about 'the possibility of marron being fished out,

under-size marron being taken and legal limits on bag sizes'. Seasonal rotational closure of rivers within the Parks was recommended. The value of keeping parts of the Shannon River free of harvesting was also noted.

Prescriptions

1. Reasons for opposing marroning were:
 - . no-one accepts the shooting of kangaroos or birds. Aquatic fauna should not be an exception.
 - . marron should not be considered a 'free-snack'.
 - . over-harvesting has depleted the marron population throughout the south-west.
 - . a protected area is important for the future of the species.
 - . popular marron sites are susceptible to damage through over-use.
 - . the surrounding forest provides adequate opportunities for marroning.
 - . keep the Parks free of exploitation.
 - . NPA policy on wildlife protection is clear and should be enforced.
 - . the riverine system is very sensitive.
 - . pressure to allow an inappropriate activity to continue is obvious.

Tighter controls on marroning were advocated in line with the options, i.e. no harvesting in certain streams or parts of streams, and reinforced with a combination of other restrictions. A bag limit of 20, as given by the Fisheries Regulations, was considered to be too high.

'Appropriate' changes to the regulations were suggested to ensure that the first marroners do not take the year's catch.

2. Monitoring of marron stocks was considered to be unnecessary provided marroning was prohibited.
3. Support for a reduction in the number of marron predators was received. It was noted that humans are also predators.

6.3.9.2 Other Native Aquatic Fauna (D9.8 Freshwater fishing)

31 submissions received.

Most comments directed towards this section centred on the issue of trout restocking.

Prescriptions

1. Harvesting of any native fauna was strongly opposed by many because:
 - . the Shannon Basin contains several endemic and several rare fish.
 - . native fish make up a significant part of the diet of exotic fish.
 - . given the low fecundity of native fish, it will be difficult for them to maintain a viable breeding population if they are continually predated.
 - . fauna are protected according to NPA policy and fish should not be expected.

It was suggested that resources be allocated to the study of native fish in the Shannon Basin.

2. The proposal to reduce or eliminate trout, while supported by many, received strong reaction from anglers and associated organisations:
 - . the Warren and Donnelly are the major trout rivers in the south-west.
 - . fish-farming is a growing industry.
 - . continued stocking of streams outside the Parks and normal operation of commercial fish-farms should not be jeopardised.
 - . the Fisheries Department hatchery has become a significant tourist attraction.
 - . trout fishing is encouraged by the Fisheries Department by restocking, and thus can be considered as being a reflection of Government policy.

- . adoption of the proposal would require major reappraisals by the Fisheries Department and could not be contemplated without a more thorough analysis.
- . if the proposal is to be adopted, give it more prominence in the plan and clarify that it is only a statement of CALM's preferences.
- . indicate the consultation mechanism proposed to achieve the proposal.
- . the 'needs' of anglers have been overlooked.
- . loss of trout in the region would have an adverse effect on tourism.
- . there is no scientific basis for eliminating trout.
- . trout fishing is a 'traditional' activity for residents and visitors.
- . trout fishing by non-locals has considerable economic benefits for the local community.
- . no large-scale predation has been observed.
- . other species have greater impact.
- . efforts to 'turn back the clock' are unrealistic.
- . an ecological 'balance' has been reached.
- . there is little, if any, documented evidence of any deleterious effects of trout.
- . reduction in trout numbers will result in an increase in redfin perch (*Perca fluviatilis*) populations. Redfin perch would have far greater impact as they are prolific breeders and cannot be easily controlled.
- . Parks should cater for a range of recreation activities.
- . anglers have 'great regard for conservation of the environment' and have minimal impact.
- . the W.A. Trout and Freshwater Angling Association have a strict code of ethics.
- . fishing is the largest participant sport in Australia.
- . stocking of trout has 'improved our rivers', by providing recreational opportunities.

Associated recommendations were to:

- . continue restocking brown (*Salmo trutta*) and rainbow trout (*S. gairdneri*) in the Warren and Donnelly River systems.

- . encourage and develop fresh-water angling.
- . take into account the 'needs' of anglers.

Those against trout restocking stressed that:

- . restocking must be discouraged.
- . stocking with exotic fish is clearly incompatible with the purpose of the Parks, which is protection of the natural environment.

6.3.10 Bush-walking (D9.5 Bushwalking)

16 submissions received.

Bush-walking proposals generally received a favourable response, although many of those interested in other forms of recreation felt discriminated against and called for similar 'unrestricted' movement throughout the Parks for horse-riding and 4W driving.

Some considered restrictions necessary as a safeguard to reduce dieback spread and problems of rubbish. Others supported bush-walking as a 'low-impact' activity that should be actively encouraged.

Prescriptions

1. Permission to bush-walk throughout the Parks on an unrestricted basis was well received, however, concern was raised that a walk trail is proposed though the lower Shannon Basin, an area of 'ecological significance'.

A number of suggestions were made:

- . establish walk trails in easily accessible and popular areas.
- . complement trails with signs and information displays.
- . establish short, circular walks from all carparks.
- . avoid walks along well-defined roads.
- . provide some dual purpose trails, i.e. horse-riding/walking.
- . design trails to avoid excessive erosion.
- . promote the Bibbulmun Track.
- . minimise the number of trail markers.
- . encourage interested clubs and persons to participate in the management program.

2. Development of day walks was supported.
3. Establishment of extended walks was also supported, with additional suggestions:
 - . before developing, examine regional opportunities and recreational use.
 - . a few well defined, well managed tracks with appropriate information are preferable to less well defined/managed trails.
 - . walkers wishing to do extended walks could be redirected to other parks if equivalent trails are already developed and under-used.
 - . provide basic shelters for walkers.
 - . walks could be routed along existing disused tracks or unobtrusive new tracks.
4. The proposal to provide information was well received. Additional suggestions were:
 - . provide maps.
 - . a questionnaire could provide a useful communication interchange and be used as a basis for decision-making.
 - . remind walkers of their responsibilities in the literature - 'leave nothing but your footprints, take nothing but your memories'.
 - . markers could be used in open areas, rather than constructing defined tracks, as demand is likely to be low and associated impacts minimal.
5. A voluntary walker registration system was supported, however, it was recommended that lone walkers be required to register for safety purposes.

6.3.11 Information (D10.1 Information)

18 submissions received.

Very strong support was received for proposals to disseminate information and encourage learning. The following associated recommendations were made emphasising the need for:

- . education and information distribution.

- . fire prevention.
- . prevention of littering and polluting.
- . promotion of angling.
- . the value of rare or geographically restricted plants.
- . education for 'traditional users' with a view to possibly phasing out inappropriate activities.
- . marron as part of the ecosystem and not just a 'free snack'.

Other more general suggestions were:

- . broad-scale distribution of information, i.e. outside the Parks.
- . The important 'education' role that a resident ranger can play.
- . education centres at the Shannon townsite, Northcliffe and Pemberton.
- . signs and education displays at all easily accessible and popular areas.
- . involvement of a 'communication specialist' in the production of information as attractive packaging is not enough.

Prescriptions

1. Correction of 'erroneous information' in the existing display at Shannon townsite was recommended. Specifically, 'inappropriate forestry production information should be removed' as well as the implication that *Banksia coccinea* grows in the Shannon Basin.
2. Signposting was supported, however, one submitter objected to large signposts and 'sophisticated furniture' designed to attract visitors.
3. It was recommended that the proposal to provide interpretive brochures also indicate that 'information will be limited to Park management and conservation issues'.
5. Active encouragement and involvement of volunteers were commended as 'excellent ideas'.

6.4 SPECIAL ISSUES

A suggestion was put forward to include a section entitled 'Assessment of Groundwater Resources'. As well, policy should allow 'reasonable access to the Scott Coastal Plain for drilling and monitoring as part of the groundwater exploration program, as a quantitative understanding of groundwater resources is desirable for State and national planning'.

6.4.1 Private Use - Squatters' Shacks (D9.9 Huts)

35 submissions received.

The issue of retention or removal of squatters' shacks, or huts, attracted considerable comment. Recommendations ranged from removal to retention, of all existing shacks.

The Karri/D'Entrecasteaux Regional Advisory Committee suggested that 'if additional leasehold type accommodation could be established ... most of the undesirable shacks could be removed'.

Prescriptions

1. That 'all huts and cabins will be removed ...' was well supported:
 - . removal of unauthorised shacks is consistent with the philosophy of national parks.
 - . shacks in a national park are inappropriate.
 - . 'the proposal is commendable'.
 - . do not bow to pressure to 'hand down' huts within families.
 - . all leases should be terminated and shacks removed.
 - . shacks should be removed or upgraded for public use, according to the site and suitability of the construction.

Hut owners requested retention of all, or particular, huts:

- . retain 'Cranker's and Rooney's huts' for Park users on a similar basis to 'Tuckett's hut'.
- . retain the hut, currently under lease on the west side of Broke Inlet channel.

- . retain Blackboy hut (200 m north of Preston Road) for public use, restore and use as a model for huts elsewhere.
- . retain all huts on the proviso that part of each is made available for general public use.
- . others considered that some shacks could serve a useful purpose if they were available for public and private use, for overnight shelter and refuge.

Supporting arguments included:

- . removal would be a 'serious contradiction of management strategies because facilities must be available for use by the general public'.
- . removal may produce a worse visual impact.

The benefits of private ownership of huts were considered to be:

- . provision of water for public use.
- . availability of shelter in adverse conditions.
- . provision of emergency help.
- . owners - often 'clean-up' after other Park users, have a commitment to preserving the area, could 'patrol' in exchange for security of tenure and have carried out rehabilitation work.

Associated requests included:

- . retain existing huts under control of present owners.
- . give life-time tenure by yearly lease to all hut owners.
- . appoint owners as 'honorary rangers'.
- . permit 'handing down' within families.
- . allow sale.
- . continue rights-of-access for hut owners.

An offer to improve the visual amenity of huts was given in exchange for security of tenure.

2. The 'implication' that the Donnelly River shacks are to be retained was not approved by some. Comments were:
 - . no explanation has been given for the 'exception'.
 - . the 'exception' is unacceptable.

- . the Donnelly River huts site should be open for public use and provide facilities in line with national park policies.

The status of the Donnelly River community was queried.

In contrast and in addition to claims that the Donnelly River huts site is poorly managed and is an 'eyesore', hut owners claim that:

- . owners have high regard for the environment.
- . no damage to flora or fauna has occurred.
- . owners have carried out successful rehabilitation works.
- . native wildlife numbers have actually increased as a result of trapping feral cats.
- . owners have contributed to the area by constructing a boat ramp, removing snags and 'cleaning up' after others.
- . families built the huts and therefore have a right to use them.

Recommendations regarding the area included:

- . amalgamate Reserves 28478 and 28479 and vest in one body.
- . set aside 'Broadwater' as a wildlife sanctuary.
- . do not allow fire-arms.

3. In response to the proposal to exchange the Camfield site for another, the following recommendations were made:

- . retain vesting of Reserve 19787 in the Shire of Manjimup, and provide the power to lease (the Shire of Manjimup also supported this proposal).
- . change the purpose of Reserve 19787 to 'recreation, camping and holiday cottages'.
- . develop as a cheap holiday-site for families.
- . retain huts as Camfield is preferred to the over- crowded Windy Harbour site.
- . expand to include the original Camfield townsite.

The Shire of Manjimup also proposed that they prepare a management plan for the site, for approval by appropriate Government departments.

Supporters of the proposals submitted that:

- . Camfield be placed under the control of CALM.
 - . Windy Harbour is better managed than Camfield. Public use should therefore be redirected from the latter to the former.
4. Retention of huts with 'historic values' was supporting, with the following conditions:
- . retain only in exceptional circumstances and in consultation with a representative from conservation organisations.
 - . give consideration to 'historic value' in 50 years time.
5. Reconsideration of the proposal not to renew licences was requested:
- . consider short-term leases.
 - . huts might be useful to bush-walkers, over-nighters and anglers.
 - . responsibility for shacks could be assumed by local groups.
 - . shacks could be used by education or recreation groups.

6.4.2 Private Use - Wildflower Picking (D11.4 Wildflower Picking)
17 submissions received.

Prescriptions

The proposal to not permit wildflower picking was highly commended. Supporting suggestions and comments included:

- . safeguard against future use of the Park for this purpose by ensuring that all of the proposed Shannon and D'Entrecasteaux National Parks achieve national park status.
- . impose substantial on-the-spot fines for infringements.
- . keep the Parks free from exploitation.

A submitter with a vested interest in the industry did not agree:

- . the industry stands to lose thousands of dollars.
- . rare and endangered plants represent only a minute proportion of the flora.
- . dieback-affected areas could be quarantined.

- . previously 'picked' areas shown no sign of deterioration, in fact some appear to be 'better'.
- . pickers earn and spend their money locally.
- . royalties to CALM would help cover management costs.

Associated recommendations were:

- . to allow 'traditional' users to continue picking on a permit basis.
- . to allow transfer of entry permits.
- . that CALM regularly burn the area to encourage blooms.
- . that some pickers be approached to investigate the effects of wildflower picking.

6.4.3 Professional Fishing (D11.3 Commercial Fishing)

15 submissions received.

Both professional and amateur fishing enthusiasts anticipated a proposal to close Broke Inlet to fishing and consequently reacted:

- . users provide a valuable rescue service.
- . fish are a renewable resource.
- . the Inlet should remain open to professional fishing and net fishing during the prescribed season.
- . allow professional fishing under the control of the Fisheries Department.
- . users of the Inlet respect the environment.

The operator referred to as being responsible for 'exacerbating dune damage' around the mouth of the Gardner River disclaimed this 'offensive and untrue' accusation.

Prescriptions

1. Permission for the commercial fishery to continue operations brought strong reaction:
 - . no commercial activities should be allowed.
 - . professional fishing affects amateur success.
 - . no licences should be issued.
 - . if professional fishermen are given 'right of way' on particular beaches, at least extend the same courtesy to amateurs.

Conversely, professional fishermen maintained that:

- . harvesting of a renewable resource has community and commercial benefits.
- . users are environmentally conscious and safeguard the resource.
- . continuation of traditional activities should be permitted and provided for in legislation.
- . small marine life is not affected.
- . Fisheries Department controls are acceptable.

2. Conditions of use of vehicles engaged in fishing operations attracted comments such as:

- . access should only be on foot through designated corridors.
- . 4WD access is inconsistent with national park policy.
- . it is doubtful that operators will comply with conditions.

Conversely, a more liberal attitude was requested:

- . allow vehicle use on beaches and along Broke Inlet under the guidance of the Fisheries Department.

6.4.4 Mining (D11.1 Mining)

33 submissions received.

Very strong views were apparent regarding mining. Some mining organisations requested modification of the prescriptions to facilitate access for mineral exploration and mining on the grounds that 'severe restrictions on multiple land use (would be detrimental to) all Western Australians'. Those opposed to mining in the Parks advocated 'no mining, no exploration, no exceptions'.

Prescriptions

1. Some submitted that opposition to exploration and mining within the Parks is not enough:
 - . 'prohibit don't oppose'.
 - . exclusion is consistent with national park policies.
 - . no commercial ventures should be allowed.

Others commended the prescription and backed their support by comments such as:

- . mining is incompatible with national parks.
- . mining scars landscapes and ecosystems leaving them virtually irreparable.
- . commodities are often available outside national parks, but on private property, however, these resource have been made inaccessible by legislation. Parks are consequently seen as 'easy options', thus legislation is required to solve this problem.

Furthermore, recommendations were made to:

- . amend the DMP in line with the Government's proposal to amend the Mining Act 1978 to prohibit mining in national parks throughout the State without the consent of both Houses of Parliament.
- . establish a buffer zone around the area mined.
- . rehabilitate open laterite pits, formerly used for road gravel or fill.

Organisations with mining interests argued that:

- . mining is 'less devastating' than timber harvesting.
- . all public land should be available for 'responsible exploration' under conditions approved by the managing agency.
- . highly prospective areas exist within the Parks.
- . the mining industry - provides employment opportunities, contributes to the development of an inventory of the State's natural resources and financially to the region and State, and would benefit a region where returns to the timber industry are declining.

Recommendations were:

- . that no extension to the D'Entrecasteaux National Park be considered until mineral exploration is exhausted 'so realistic assessment can be made of the economic potential before the area is sterilised'.
- . that exploration and mining be permitted in the existing National Park in all but very sensitive areas.

- . that maximum access for continued exploration be available.
- . that 'no automatic denial of access' for mineral exploration exist.
- . that mining which 'does not present long term conflict with the principle use' of the land be considered.
- . that a policy of multiple land use be adopted through zoning.
- . that the high prospectivity of the region be recognised by providing access.

More general recommendations, relating to all national parks and reserves in the State were:

- . that legislation governing access to parks and reserves in the south-west not be extended to outside the south-west.
- . that the Minister for Minerals and Energy continue to prescribe environmental conditions in consultation with the responsible Minister.
- . that access be authorised to mark out tenements only in order to convert an exploration licence to a mining lease.
- . that non-invasive, non-destructive exploration be permitted without a tenement.
- . that exploration activities that involve significant ground disturbance only be permitted under provisions of a tenement.

2. Similarly to the response to prescription 1, strong opposition to any exploration or mining was received. Mining interest groups agreed to the restoration conditions.
3. The proposal to close the limestone quarry at Windy Harbour was supported and opposed. Supporters of the prescription generally agreed that the mine should be closed as soon as possible as it posed a threat to Park values, and that 'until this is done, conditions must ensure minimal environmental damage'. Others believed that the proposal was based on the

belief that the quarry was not operating. Contrary to this it was advised that the quarry:

- . produces high quality lime 'essential for local farming operations'.
- . is the only lime source within 150 km.
- . provides road-building material in an area of scant resources.
- . supports and involves four families who have voluntarily rehabilitated previous operation sites.

Recommendations put forward were to:

- . allow operations to continue on the proviso that satisfactory landscaping be carried out to minimise the visual impact.
- . excise the quarry from the Parks so that operations do not conflict with national park policies.
- . if existing practices are unsound, relocate within the Park, then excise. Any relocation should be governed by strict mining controls and the existing quarry rehabilitated.

6.4.5 Public Utilities (D11.7 Public Utilities)

10 submissions received.

Prescriptions

1. The proposal to 'generally not provide' utility corridors was reasonably well received with congratulations offered for suggesting alternative methods for generating/providing power.

Some offered conditional support, suggesting that:

- . the prescription could be stonger with less room for exceptions.
- . the value of national parks is underestimated and the financial costs to departments such as the SEC should not be 'rated above' the value of irreplaceable natural areas.
- . a power supply for Windy Harbour is required.
- . a power-line reserve to Windy Harbour should be established prior to the Park's gazettal.

- . power lines to Windy Harbour could follow the existing road reserve.

6.4.6 Apiary Sites (D11.5 Beekeeping)

19 submissions received.

The general issue of bee-keeping in conservation areas was raised by both advocates and opposers.

Those in favour of bee-keeping claimed that:

- . no conclusive evidence exists that native pollinators are adversely affected by the presence of honey bees in the long term.
- . if any affects are apparent, feral bees are likely to be responsible.
- . it is unlikely that commercial honey bees compete with native fauna to any appreciable degree.
- . effects on eucalypts or banksias are extremely unlikely.
- . bee-keeping is an unobtrusive industry.
- . apiarists are responsible conservationists.

Those against bee-keeping in the Parks submitted that:

- . evidence exists to show that the presence of hive bees reduces honey-eater numbers;
- . evidence exists to show that introduction of large numbers of bees will cause population changes in other species.
- . evidence exists that exotic bees have an overall detrimental effect.
- . bee-keeping in a national park is inappropriate.
- . exotic bees are inefficient pollinators.
- . European bees exist at the expense of native bees, insects and birds.
- . the area should not be commercially exploited.

These subscribers recommended that:

- . sites be removed and access tracks rehabilitated.
- . activities be phased out over the next three years.

Regarding capability, the statement that 'there are no substantial areas of forest which are not available for lease by apiarists' was discounted as untrue as no new leases are currently available in dieback - quarantined State forest. Also, the statement that the Shannon Basin and Pingerup areas contain suitable reference areas that are free from exotic bees was also disputed as feral bees are well established in the Shannon region.

Regarding the issue of equity, it was suggested that the most equitable arrangement would be to avoid any impact on individual apiarists by not cancelling any sites.

Those less sure of the activity suggested that:

- . access be restricted to minimise the risk of dieback spread.
- . the effects of apiary presence be monitored.

Prescriptions

1. Most apiarists considered the 2 km buffer excessive, exaggerated and based on misinformation. Distances ranging from 50 to 200 m were considered safe:
 - . provided the apiary is properly positioned in terms of flight paths and public access tracks.
 - . depending on vegetation density.
 - . in areas not continually occupied.

Recommendations from apiarists were:

- . inform the public of the presence of hives with signs.
 - . consider each situation on merit.
 - . consider various proposals for alternative sites put forward by individuals and industry.
2. Requests to reconsider relocation or cancellation of sites without access were made, on the grounds that:
 - . honey production will be compromised.
 - . it is difficult to find suitable alternative locations.
 - . access is only required for 3 or 4 months every 4 or 5 years.
 - . existing sites are very valuable and irreplaceable.

A number of alternatives were proposed:

- . allow unrestricted access to sites on management roads.
- . provide a special permit and vehicle identification to apiarists.
- . restrict and control access to sites with gates or signs rather than closed roads.

Further recommendations regarding sites affected by road closures were:

- . relocate to open roads within the Shannon.
- . move to nearest available location.
- . maintain a 3 km space between sites unless they are owned by one apiarist in which case a 2 km spacing would be adequate.
- . relocate to a site selected by the apiarist.
- . relocate outside the Parks only as a last resort.

Many proposed alternative sites.

3. The proposal to establish a research program resulted in the following comments:
 - . careful assessment is necessary before work is undertaken.
 - . absence of feral bees must be guaranteed for work to be meaningful.
 - . investigation of the impact of managed apiaries over and above resident feral populations would provide useful information.
 - . dieback-quarantine areas could be used as experimental zones.
 - . apiarist expertise could be sought to identify a bee-free zone.
4. The 'genuine concern' to reorganise apiary sites in fairness to all lessees was appreciated. Consultation with individuals was requested.

Assessment of alternatives in the quarantine area adjacent to the eastern boundary of the Park was also sought.

6.4.7 Forest Products (D11.6 Forest Products)

24 submissions received.

Prescriptions

1. There was strong support for the 'no logging' proposal. No objections were received.

Concern was expressed, however, that the forest is not protected in the long term by legislation. Submitters again strongly urged that this situation be rectified by declaring the Shannon Basin a national park. Similar concerns were:

- . a considerable area within the Park was clear-felled at one time.
- . pressure will increase as hardwood stands are depleted.

Those engaged in logging practices were urged to search for alternatives, not compromises.

2. Many strongly supported the proposal to prohibit removal of damaged timber 'on principle'. Others suggested that:
 - . it is 'a ridiculous stance ... because many of our national parks are too small for natural processes to operate'.
 - . the CALM Act be amended.
 - . limited salvage could be accommodated, as dead and severely damaged trees were probably not a normal feature of southern forests prior to European settlement.
3. Removal of trees which pose a danger to the public was supported, and a recommendation made that 'the funds obtained from sale of forest produce from unavoidable clearings in national parks should be directly secured for use in national park management'.

6.5 GENERAL MANAGEMENT

6.5.1 Staff and Finance (D12.1 Finance, D12.2 Staff)

30 submissions received.

Genuine concern for a need to provide more funding and staffing was apparent, with variations of the same theme reported:

- . the plan's success or failure will be a measure of the resources allocated.
- . financial commitment is essential for proper management.
- . a lack of commitment to staffing will lead to an overall deterioration in these and other Western Australian parks.
- . the need for funding cannot be too strongly emphasised.
- . an army of personnel is needed to implement the plan.
- . the Government cannot expect CALM to find resources within existing staff and budgets to carry out work on new areas added to the CALM estate.

The suggestions received are well summarised by the following comments:

- . to allow potentially damaging activities without staff to police and control could lead to serious consequences for the long term viability of the national park system.
- . inadequate funding results in an inability to 'uphold conservation responsibility'.
- . Western Australian parks and reserves have, for too long, been under-funded, under-staffed and under-appreciated.

Other issues raised were:

- . inadequate funding and staffing may lead to 'over-protection' and result in limitations being place on recreational opportunities.
- . visitor numbers will increase with wider publicity, but no mention has been made of the potential hazards nor CALM's ability to cope.

Some proposals to overcome these potential problems were made:

- . seek assistance from tertiary bodies and other appropriate groups for inventories and research projects.
- . use Park generated funds in the Parks.
- . taxation reform based on land values (i.e. the greater the value of land the greater the tax paid) to increase Government revenue and hence money available for national park management.

Offers of assistance in management were made.

Prescriptions

1. Concern and scepticism were apparent regarding the proposal to allocate four rangers 'if and when finances become available'.

The roles of rangers were regarded as:

- . overseeing recreation activities.
- . information dissemination.

Allocation of only four rangers was considered inadequate and a number of 'more realistic' proposals were put forward.

Other suggestions and concerns were that:

- . at least three full-time rangers are required to fulfil the requirements of Section 56(1 c) of the CALM Act.
 - . proposed staffing levels will never be achieved in a climate of Government cuts in spending.
 - . if proposals cannot be satisfied then there is no justification for allowing the levels of recreation suggested, considering conservation and safety issues.
 - . assistants should be sought.
2. Again concerns centred on 'inadequate staffing'. As rangers are already heavily committed to other areas, the full-time and half-time allocations were not believed to be real reflections of the time rangers could devote to their duties within the Parks.
 3. The budget was generally described as inadequate to meet the plan's proposals, however, one submission indicated that it would suffice provided that restrictions on recreational use were adopted.
 4. Appointment of 'appropriate' staff for Park management was recommended, or alternatively train existing staff so they 'regard (the) resource in terms of conservation and passive recreation rather than for timber production'.

5. Support was received for the proposal to divide the Park into broad administrative blocks.
6. Park entry charges also received support, although the method of collection was queried. Again it was recommended that the money be used in the Parks.
7. Appointment of seasonal rangers was supported. It was queried whether they would be new appointments.

6.5.2 Park Boundary (D2.2 Park Boundaries)

45 submissions received.

A number of recommendations for changes to the proposals were made ranging from site specific to general.

Prescriptions

1. Both support and opposition to boundary extension proposals were received. Those who offered their support commended the principle, but some misgivings were apparent:
 - . catchment boundaries are good, rivers and scarps are not; the whole feature should be included in the Park.
 - . existing tracks and roads should be used as a boundary, or alternatively the area between roads and the Park boundary should be managed as a buffer.
 - . a 'swapping swindle' is apparent, i.e. economically useless land (e.g. heath and dunes) are proposed for inclusion while commercially valuable karri is excised.

Requests were received to:

- . give full justification for the proposed changes.
- . reconsider boundary changes.
- . set aside specific management areas for future timber production.
- . adopt a zoning scheme to delineate areas of greatest conservation value, and recreation, timber production and mining areas.

Those opposed to the boundary extension suggested:

- . a delay until mineral exploration has been completed.
- . that the proposals completely disregard effects.
- . that the opportunity for multiple-use would be lost.
- . the loss of timber resources has not been considered.

The Karri/D'Entrecasteaux Regional Advisory Committee suggested that major boundary changes at this time are inappropriate as these may delay the gazettal of the Parks.

Site specific comments were also made:

Yeagarup. A boundary shift to the nearest management track was accepted. It was suggested that, prior to the shift, the forest area south of Charlie Road be 'cut over and regenerated ... to avoid loss of a forest resource'.

Chesapeake. It was generally agreed that Chesapeake Road forms a logical boundary.

Lewis Road. Support for, and opposition to, the proposal was received. The area to be excluded from the Park:

- . contains a 'least disturbed area' and may contain 'rare or restricted species'.
- . acts as a buffer for two locations, with confirmed 'rare or restricted species', which are already under pressure.
- . contains valuable karri areas. Its exclusion would result in the loss of more karri forest from conservation areas.

Northcliffe Timber Reserve. Inclusion of this reserve was supported by some, and opposed by others who recommended that:

- . the boundary be changed to Ladhams Road;
- . locations 12914, 12915 be included along with locations 8593, 8594, 8599 and 8600 when available, in the interests of 'boundary rationalisation, ecological integrity and ease of management'.

Jasper Area. The proposal was accepted by some, and opposed by others who suggested that:

- . it is not necessary to include as jarrah is adequately represented in the Park.
- . the boundary should be shifted to Jasper Road.
- . the reasons given are inadequate, a highway frontage is unnecessary and the area to boundary ratio will be worse.
- . the area be excluded and zoned for recreation.

Broke Inlet. Support for the establishment of a marine park was received, however, concerns were expressed that if a marine park was declared, recreational use would be restricted:

- . Nornalup-Walpole inlets are more suitable marine parks and are strategically located for administrative ease.
- . the proposal is acceptable provided power boating, professional fishing and net fishing are allowed to continue.

A clear statement of management policies and objectives for marine parks was requested.

2. Some concern was expressed regarding the apparent need to construct new roads for Park management. Use of existing tracks was preferred.

6.5.3 Alienated Lands Within and Adjacent to the Parks (Private Property, Pastoral Lease) (D2.3 Alienated Land Within and Adjacent to the Parks).

25 submissions received.

The issue of acquisition of private land enclaves and non-renewal of pastoral leases brought mixed reactions, with many supporters stressing the need for urgent action.

Reference to the appeal of 'a landscape which contains both natural and man-made or man-altered environments' was considered to be:

- . true, but inappropriate and irrelevant because there are plenty of 'altered' environments outside the Parks.
- . a departure from the national park concept.

One submission offered support for all the options presented, but questioned what were the 'risks to be minimised' (option 1).

Prescriptions

1. Acquisition of private property with important conservation or recreation values was well supported. One submitter suggested that pressures be applied to, or incentives provided for, landowners to make their land available to CALM. Another referred to properties at Lake Maringup, Doggerup Cliffs and Malimup as being particularly important in terms of their conservation values.
2. Controls over private land were both supported and opposed. Supporters of the proposal suggested:
 - . strict legislative controls to prohibit any subdivision or title transfers.
 - . it is imperative that public costs associated with enclave development be addressed at Cabinet level.

Advice was received that if recommendations of the Pastoral Land Tenure Report are accepted by Government, termination of pastoral leases may be possible.

Those against the proposal submitted that:

- . subdivision and use of the land should be allowed 'in light of tight economic times'.
 - . a benefit of subdivision could be greater on-site interest and therefore protection, so fewer rangers would be needed.
 - . rights of landowners, and a sense of 'fair go' have been overlooked.
 - . landowners will be disadvantaged by decreases in land values.
3. Most supported cancellation of pastoral leases. Particular mention of the problems of weed and erosion associated with pastoral leases were made, plus suggestions that leases should be either terminated or erosion control works required. The

Karri/D'Entrecasteaux Regional Advisory Committee also endorsed repurchase, or confining grazing and burning activities to leasehold areas.

Some submissions advocated cancellation as soon as possible, while others wanted 'security of tenure for life of the lease'. One submitter argued that cattle had caused no appreciable harm over the hundreds of years they had occupied the area, and stock had kept the understorey under control.

Suggestions for use of acquired land included:

- . use of the sites for recreation or accommodation, to provide a contrast between the natural environment and a wider range of accommodation options, as well as removing pressure from fragile environments.
- . rehabilitation.

5. Facilitation of liaison was endorsed.

6. Monitoring was supported. The areas leased and the purpose of these leases were queried.

6.5.4 Shire Land (D2.4 Shire Reserves)

21 submissions received.

Mixed opinions about future control of Shire land were received:

- . the Shire of Manjimup should retain land for more settlements such as Windy Harbour.
- . the land should be managed under national park guidelines.
- . acquire all Shire land so it will be managed by one authority.

The fate of Shire land containing squatter's shacks has been addressed in Section 6.4.1 Private Use - Squatter's Shacks.

6.5.4.1 Windy Harbour

Development and expansion of the Windy Harbour site were the main issues addressed:

- . ideally, restrict in area.

- . only expansion should be to accommodate the Camfield settlement.
- . CALM management is preferred.
- . any growth would encroach on the Park and put more demands on associated services.
- . expand Reserve 12439 to include Reserve 17495.
- . extend eastern boundary for a rubbish site and provide additional lots for professional fishermen.
- . no more development except a Shire-run caravan park.

Prescriptions

1. A co-ordinated approach to the use and management of Shire land was supported.
2. The details regarding water supply were, for some, too scant to enable comments to be made. Recommendations for securing existing and future water supply for the settlement were:
 - . a formal lease arrangement between CALM and the Shire of Manjimup.
 - . excision of the required areas and vesting in the Shire of Manjimup.
3. Removal of rubbish from the Windy Harbour site was considered:
 - . acceptable, provided rubbish is taken outside the Parks.
 - . impractical, because of relocation and removal costs.

It was suggested that if the rubbish dump was closed, people would be more likely to dump their refuse in the Parks.

Disposal of rubbish on site was considered to be undesirable for health reasons. Also, difficulties were foreseen in obtaining State Health Department approval for a new site.

Continued use of the existing site was favoured as:

- . its location is convenient and it is therefore used.
 - . it is inconspicuous.
4. The 'land swap' proposal received support, but 'only in consultation with the Windy Harbour Board of Control'.

Boundaries for the proposed extensions to the Windy Harbour settlement have been proposed by the Shire of Manjimup. These have been endorsed by the Karri/D'Entrecasteaux Regional Advisory Committee.

5. It was agreed that work on Windy Harbour Road be subject to certain conditions.

6.5.4.2 Camfield

The Shire of Manjimup advised that 'at this stage it has no intention of surrendering the Camfield reserve', as Council is likely to require it in the future. Some agreed that the land be retained in Shire control and developed as a cheap holiday-site. Others, however, supported the 'swap' proposed, recommending that it be managed by CALM. (See also Section 6.4.1 Private Use - Squatter's Shacks).

The Karri/D'Entrecasteaux Regional Advisory Committee recommended that if the Camfield site remains under the control of the Shire, then it should be managed in sympathy with surrounding Park values.

6.5.4.3 Gardner River

The proposal to acquire Reserve 15776 at the mouth of Gardner River was considered satisfactory by some, with recommendations received that it no longer be used as a camp-site.

The Shire of Manjimup, however, advised that the prescription was 'unacceptable', however, that Council 'will be happy to consider surrendering the reserve when the ...plan is finalised and is to the satisfaction of this local community'. The proposal to include the area in the National Park was endorsed by the Karri/D'Entrecasteaux Regional Advisory Committee.

Further recommendations centred around expansion of the site:

- . exchange part of Reserve 15776 (east side of river) for locations 3706, 4418, 7760, 6464 (west side of river) and vest in the Shire of Manjimup.
- . expand only to include location 3706.

6.5.5 Log Road Access (D7.4 Log Road Access)

15 submissions received.

The proposal to close Preston Road was commended by some, but brought angry reaction from others.

On one hand, closure was sought as soon as possible. Concern was expressed that pressure from the timber industry would result in the continued use of roads in the Shannon by log trucks.

On the other hand, those involved in the timber industry argued that:

- . it is inequitable to differentiate between private and commercial use.
- . it is incorrect to surmise that log haulage through the Park is contrary to management principles.
- . the reasons given for prohibiting timber haulage are incorrect and unsubstantiated.
- . log trucks make little more noise than other commercial traffic.
- . dust is easily controlled.
- . the industry is willing to take action to minimise danger to Park visitors.

Furthermore it was argued that:

- . the alternative of clearing forest for a new road is not favoured.
- . the Government will be required to pay additional compensation if Preston Road is closed.
- . other roads exist for public access.
- . the timber industry is probably willing to contribute to any road costs.
- . major impact caused by road construction has already occurred.
- . log trucks have minimal impact compared to the impact caused by other road users.
- . Preston Road is not physically different to the South West Highway which also traverses the Park and is to remain open.
- . problems associated with log haulage along Preston Road are minimal.

- . Preston Road should be considered a 'non-conforming land use' and therefore the associated land use priority should be changed.
- . road closure would involve needless additional cost to industry and ultimately to the State.
- . the timber industry established Preston Road for rapid and safe transit of goods, in good faith and on the understanding that it would remain available for use.
- . diversion will require the use of more and smaller trucks.

Consultation with the State department responsible for the Highway, regarding the consequences of increased use, was recommended.

Prescriptions

1. Support for the proposed closure of Preston Road was received and the proposed closure described as a commendable move to minimise disease spread. In addition to the points given above, and in summary, opposers to the proposal claimed that:
 - . closure will involve unnecessary environmental, social and economic costs.
 - . no valid reasons for closure have been given.

Indefinite use of Preston Road for log haulage was requested.

2. Many urged that the northern bypass be developed as soon as possible while the timber industry argued that the bypass would:
 - . increase risk to the public.
 - . increase road maintenance.
 - . add considerably to log haulage costs.
 - . mean unnecessary clearing of forests to upgrade roads to a standard suitable for log truck use.
3. The conditions of use of Park roads for log haulage were unopposed, although a preference for scraping to clear vegetation, rather than slashing, was indicated.

6.5.6 Access for Management (D7.3 Access for Management) 5 submissions received.

Few comments were directed to this section. The prescriptions were generally considered to be good. Only those with additional comments are addressed.

Prescriptions

1. It was recommended that no new tracks be established and that consideration be given to walking if management of an area without a road is required.

Similarly, support for fire protection tracks was received, provided no new tracks were established.

6. The Bush Fires Board acknowledged the philosophy behind the restrictions on vehicle access, but stressed that allowances must be made for emergency vehicles.

6.5.7 Fire (D6.1 Fire)

34 submissions received.

The fire management section received considerable response, some endorsed the proposals, but most submissions expressed disapproval for some, if not all of the proposals.

Major concerns were:

- . frequency of prescribed burns.
- . suitability of fire regimes.
- . the basis of decision-making.

General criticisms of the fire management proposals were that it:

- . lacks any sound ecological basis.
- . will not protect flora or fauna and therefore contravenes stated fire management and NPA management policies.
- . is based on historical, socio-economic criteria.
- . is more appropriate for production-forestry areas.
- . is contrary to the statutory objective of national parks as it will not achieve or promote 'proper maintenance and restoration of the natural environment, or the protection of indigenous flora and fauna'. In fact, the opposite may be true.

It was also suggested that there should be no justification for burning other than for ecological reasons, except around facility areas and buffer areas which are, preferably, outside the Parks.

Prescribed Burns

The frequency of prescribed burns was considered excessive and inappropriate:

- . regular fire depletes food resources and shelter, encourages dieback and invasion by exotic plants, and increases erosion.
- . many species of flora and fauna are highly specialised and are not adapted to fire, however, which species are adversely affected is not known.
- . an assumption that fire is beneficial is shallow justification for its widespread use as fire adaptation could be a stress response.
- . many wildfires are started by prescribed burning operations (1976 Forest Department report - 72%).
- . frequent fire encourages dieback.
- . an unburnt ecosystem is often a pre-requisite for indigenous fauna.
- . many plants and animals have restricted distribution because of the effects of fire.
- . fire cannot and does not maintain or increase species diversity.
- . the regime is based on ground fuel loads and does not take into account factors such as the role of the understorey, moisture content, compaction or layer structure or oil content.
- . time to mature and set fertile seed varies from species to species. Karri is believed to take about 45 years.

Justification for some of the criticisms included:

- . an ecologically-based fire management plan will afford life and property similar protection.

Associated recommendations and requests were:

- . implement the plan using the NSW National Parks and Wildlife Service fire policies for guidance.
- . exclude fire from high conservation areas.

- . expand the proposals to include investigations to determine the feasibility of burning patches and buffers without established edges.
- . only burn for regeneration.
- . give credence to the differing requirements of different species.
- . emphasise prevention through enforcement of legislation, education and restriction of access during high-fire-danger periods.
- . any burns should be done in autumn using a range of fire intensities.
- . establish firebreaks around facilities.
- . bulldozed firebreaks should be kept to a minimum, all firebreaks should be carefully planned, and follow contours where possible.
- . establish a committee of 'pioneer ... descendants with fire management experience' to advise on the burning practices of graziers and bushmen.
- . continue to burn 'Deeside coast' every 3 - 5 years.

Other general comments were:

- . the five year review is encouraging.
- . Map 17 is 'grossly inaccurate' as pressure on graziers not to burn has effectively reduced burning frequency, resulting in environmental degradation.

Prior to its acceptance of this plan in terms of the Bush Fires Act Section 34(1), the Bush Fires Board requested assurance that sufficient funds would be allocated to ensure the protection of life and property.

Fire Regime Used By Aboriginals

Attempts to duplicate this regime were both encouraged and discouraged. Objectors described it as poor justification for implementing unproven fire regimes. Instead, the aim should be replication, as far as possible, of natural seasonality, periodicity and intensity.

Wildfire Management

The Bush Fires Board advised that:

- . it accepts the management priorities.
- . it does not accept the decision-making model as it is at variance with stated objectives, it is contrary to the requirements of owners and occupiers of land under Section 58 of the Bush Fires Act and the management and suppression strategy must incorporate concern for life and property, management objectives and commonsense.

The Board also questioned the logic of the back-burning strategy.

Prescriptions

1. *No planned burn areas (NPB)*. More NPB areas were advocated and recommendations made to:
 - . isolate from public roads and facility areas;
 - . minimise disturbance when establishing access.

Others considered that there should be fewer areas of high fuel accumulation because of the risks to:

- . human lives.
- . ecological values as a result of catastrophic wildfire.

Short-rotation protection burns. This technique was not generally favoured:

- . keep fire-free for as long as possible.
- . discontinue in favour of a 'more applicable fire management plan that allows natural forest to evolve'.

Some, however, supported the strategy:

- . burn to retain wildflower blooms for pickers.
- . for every NPB an equivalent area should be burnt every three to four years.
- . increase the number of access routes to reduce firebreak construction and maintenance costs, and to facilitate access for bushwalkers.

Flexible management areas (FMA). The concept was commended and more FMA areas advocated. Closure of unnecessary fire

tracks and care to minimise disease spread were recommended.

Fire management based on land units was recommended.

2. The Park protection burning strategy was described as representing 'former Forests Department wood production-orientated fire management practices'. A query was raised regarding the scientific basis used for the 'mechanical approach'.

The Bush Fires Board specifically recommended the following for both Park protection burn and flexible management areas:

- . have six to eight year rotation burn in heathland.
 - . maintain a low-fuel zone, two kilometres wide, around facilities.
3. Recommendations to investigate alternative, less destructive, methods of fire control were made. These submissions recommended:
 - . minimal burning for safety only.
 - . careful site design and management.
 - . small 'pocket' burns in the Windy Harbour area.
 - . co-operation and liaison between Park managers and other land managers and owners.
 - . the development of co-ordinated fire plan, by the Shire of Manjimup and Windy Harbour Board of Control for the Parks and recreation reserves.
 4. The inclusion of stands of regenerating karri in NPB areas was recommended.
 5. It was suggested that burning prescriptions should aim to replicate natural fires.
 6. Aerial burning techniques were generally not supported:
 - . they are unnatural and therefore should not be used in conservation areas.
 - . replace by strip burns vertical to the sea to allow seed propagation on three sides (Windy Harbour to Malimup).

- . an efficient ground team is more likely to retain control.
7. Protection of NPB areas was generally not favoured.
 8. Monitoring and research proposals were generally well received. Additional suggestions were:
 - . examine the time intervals between burning and viable seed-set
 - . implement the fire programs in conjunction with flora studies.
 - . any experimental burning should be carried out in State forest.
 - . until investigations have been conducted, burning practices should be conservative.
 - . ensure that protection objectives are not fulfilled at the expense of the environment.
 9. It was proposed that the decision to use and control fire should rest with a committee of experts in fire management planning, responsible to the NPNCA.
 10. The Bush Fires Board agreed in principle with ecological and wildlife management control, but could not agree that the decision model represented a 'sensible approach to the problem'. Fire suppression activities closely aligned to management objectives were advocated.

Other submissions recommended that conservation be given at least equal priority to property, and that the need for suppression be weighed against possible ecological consequences.

11. The Bush Fires Board strongly recommended the adoption of the State's fire danger warning system rather than the Forest Fire Danger System, which they considered to be confusing and without legal significance.

12. Firebreaks were considered by some to only be necessary where private property was perceived to be a fire hazard. Existing breaks were accepted.

Liaison and consultation between CALM and the Bush Fires Board was advocated.

13. It was considered necessary for lessees to be forbidden to light fires without NPNCA approval.
14. An information system was well supported with some requesting that greater emphasis be placed on this system as a preventative measure. It was recommended that the information be conservation-orientated, rather than being used as a mechanism to justify burning.

6.5.8 Disease (D6.2 Dieback and Disease)

10 submissions received.

General support was received for this section.

Concerns centred on the risk of dieback spread from vehicles driving off tracks and from tracks proposed for future use that pass through areas either infected or at risk from infection, i.e. Warren Beach, Yeagarup, Summertime, Tragedy, Fish Creek Tracks and the unnamed track to Coodamurup Beach.

Concern was also raised that no mention had been made of the risk of dieback spread through repeated burning. Destruction of the litter layer and subsequent exposure of the moist soil to the heat of the sun, creates an ideal environment for the fungus.

Prescriptions

- 1.& 2. The need to construct any new tracks, given the number already in existence, was questioned. Also, the need for strict hygiene procedures for both vehicles and personnel using closed roads and tracks was stressed.

3. Enforcement of no off-road driving was advised, but the capability to enforce was queried.
4. Explanation of the Seven Way Test was requested.
5. An indication of the availability of disease location maps was requested.
6. The need for dieback hygiene requirements for CALM personnel was again stressed.
8. Hygiene procedures related to earth-moving activities was supported, although it was suggested that only CALM should be involved in such activities.
9. The public information program was well supported.

6.5.9 Exotic Plants and Animals (D6.3 Pests and Weeds)

17 submissions received.

6.5.9.1 Plants

The prescriptions relating to control and eradication of exotic plants and animals received support, although some disappointment at the lack of policy statements was conveyed. The ability to implement, given limited finances, was a cause for concern.

The Agriculture Protection Board (APB) proposed that emphasis should be placed on the protection of adjacent agricultural land from declared plants and animals.

Prescriptions

1. The issue of eradication techniques drew attention:
 - . eradication should be physical, not chemical.
 - . techniques should be 'environmentally sensitive'.

Ex-Forest Department trial plots of exotic plants also drew comment:

- . there is no need to remove until no more useful information can be obtained.

- . do not remove the stands of *Eucalyptus muelleriana* until they reach SEC pole size (about 1995).
- . 'existing plantation of exotics which have failed should be destroyed'.

Monitoring and seed-harvesting of pines (*Pinus pinaster*) was preferred to eradication, as was retention of the successful coloniser, marram grass (*Ammophila arenaria*).

Establishment of criteria for prioritising eradication of noxious weeds was proposed.

2. Use of indigenous species for rehabilitation was supported, provided indigenous means local.
3. Controls on the introduction of exotic plants into facility areas were recommended. Eradication of all introduced plants was favoured by most.

6.5.9.2 Animals

Some disappointment and concern was expressed that this section of the DMP contained no policy statement nor prescriptions.

Proposals to eradicate introduced fauna were supported, although the proposal to eradicate trout from the Parks resulted in considerable opposition (see Section 6.3.9.2 Other Native Aquatic Fauna). Similarly the issue of dingo protection received comment:

- . 'if dingoes are allowed to go unchecked farmers will have no option (but) to lay bait themselves'.
- . dingoes/feral dogs could become a problem if allowed to increase.

Use of poison baits was opposed by another as baits pose a danger to water quality and native fauna.

The APB recommended inclusion of the following:

'Declared and other species of Animals

The Management Program, adopted in regard to animals declared under the provisions of the Agricultural and Related Resources Protection Act, will have emphasis on the protection of adjoining agricultural properties against the intrusion of declared species on to other properties adjoining the National Park, as well as carrying out any necessary control work within the Parks.

'Prescription

Under the Management Program, declared animal control activities will be undertaken as necessary around the internal surrounds of the National Park adjoining private land, and land vested in other Government departments.

'In respect to specific species at present known to be existing in the area, control shall consist of the following:

'Foxes (*Vulpes vulpes*)

As necessary control by poisoning or trapping to control foxes on the internal surrounds of the Parks, to a depth necessary for the protection of adjoining agricultural property.

'Dingo (*Canis familiaris*), Dingo hybrids and Wild dogs

Control as necessary shall be implemented by poisoning and trapping on the internal surrounds of the Park, to a depth necessary for the protection of adjoining rural properties.

'Rabbits (*Order Lagomorpha*)

As necessary control shall be undertaken to protect adjoining rural property from rabbits. Such control may consist of poisoning, warren fumigation and warren destruction.

'Other declared species of feral animals

As necessary, control action to be undertaken to prevent the establishment of other declared species of feral animals within the National Park, e.g. feral pigs and feral deer.

'If such animals are introduced at any time, then appropriate action shall be undertaken for their eradication and the protection of adjoining property from such animals.'

6.5.10 Rehabilitation (D3.4 Rehabilitation)

10 submissions received.

It was suggested that any obligations by logging companies to rehabilitate areas be honoured, rather than using public funds. Involvement in areas of Park management other than rehabilitation was considered to be more rewarding in terms of 'educational' value.

Prescriptions

Again, only those prescriptions which received comments other than those of support have been addressed.

1. Protection of regenerating karri forest through burning of additional forest was not favoured. Incorporation of these areas into NPB areas was recommended.
3. Rehabilitation, to a standard suitable for use, of some poorly located roads was preferred to relocation, particularly where relocation would involve more damage than improvement works.
5. More details on the localities of recreation areas that 'may need to be closed and not re-located' were requested.
10. Again, further details were requested. The issue of environmental damage caused by relocation of public access routes was also raised. It was recommended that people be encouraged to leave their vehicles to enjoy a view, rather than being able to admire it from within the vehicle.

6.5.11 Cultural Features

7 submissions received.

6.5.11.1 Aboriginal Cultural Resources (D8.1 Aboriginal)

Preservation and protection of the Bibbulmun Track as an Aboriginal site, in liaison with the Aboriginal community, was suggested. Its promotion as a walk track was also advocated.

The existence of Aboriginal artefacts was considered to require greater emphasis in the plan.

Prescriptions

1. While the prescription to ensure that there is no disturbance to recorded Aboriginal sites was accepted, the construction of any new borrow pits was opposed.

6.5.11.2 European Cultural Resources (D8.2 European)

The comments received were favourable. Suggested resources for inclusion were:

- . old logging sites, arboreta or old townsite plantings which could be incorporated in an interpretive program.
- . exotic species of significance, determined through compilation of a resource inventory.
- . several Camfield shacks.
- . Scott's stone house.

Prescriptions

3. The term 'potential cultural resource' was queried.
- 4.& 5. More details on European cultural features with historical or educational values were requested, as well as a definition of 'appropriate information about past European use'.

6.5.12 Public Safety (D12.3 Public Safety)

5 submissions received.

Prescriptions received only support. Suggested additions were:

- . speed restrictions of 60 km/hr on all roads, the only exception being the South West Highway.
- . signs on the access roads to the coast warning of the dangers of the coastline.
- . a warning sign at Lake Jasper regarding the unexpected deepness of the water.
- . closure of some facility sites in the Parks on days of extreme fire hazard.

Prescriptions

1. Clarification of the term 'excessive danger' was requested.

3. While specific safeguards were acknowledged as necessary, requests to minimise safety 'furniture' were received and alternatives proposed:
 - . guide the public away from hazardous areas.
 - . ban the public from specified areas during extreme weather conditions and periods of high fire danger.
4. It was noted that the register system for bush-walkers would also provide some record of Park use.

6.5.13 Public Involvement in Park Management (D10.2 Public Involvement)
5 submissions received.

Public involvement in decision making and Park management was well received, with many submitters recognising public involvement as one way of overcoming funding problems.

More formal involvement was suggested through:

- . resident honorary rangers, including hut owners;
- . 'friends' groups.

6.5.13.1 Involvement in Management Decisions

Seeking of advice from a wider audience than that proposed was recommended, eg. voluntary conservation groups and bodies such as IUCN.

6.5.13.2 Involvement in Implementation

Numerous offers of help were received. Proper supervision was considered essential as well as avoidance of 'make-work'-type projects.

Consultation with the local community regarding development proposals was strongly recommended.

Prescriptions

1. Invitations to interested groups and individuals to help were advocated.

2. The information on display at the Shannon townsite was considered to be in need of review as the forestry production information is inappropriate. Any information produced should be conservation-orientated.

6.5.14 Survey, Research and Monitoring (D13.0 Survey, Research and Monitoring)
13 submissions received.

Only support was received for research and monitoring proposals, with accompanying recommendations that the research programs should begin immediately. The value of monitoring and particularly the need to assess the effects of strategies was highlighted. Associated proposals included:

- . assess in terms of national park values.
- . any prescription involving disturbance must be assessed in terms of its effect on biological and cultural values.
- . where a management action results in environmental disturbance, the impact must be assessed.
- . determine how best to encourage and facilitate useful public comment.
- . Park rangers could record routine observations, therefore carrying out a monitoring function.

The problems associated with limited funding were emphasised.

The priority listing was considered to be too 'pro-people'.

7.0 PROGRAMMING AND BUDGETING (E1.0 Programming and Budgeting)
8 submissions received.

Concerns centred on inadequate funding being available to implement proposals, and on the allocation of funds.

Regarding allocation of funds, the following points were made:

- . the funding detailed in the plan does not account for salary or administrative costs; full details of management costs should be included.
- . no allowance has been made for purchase of alienated lands.

Priorities were believed to be:

- . studies of the area.
- . data collection - \$10,000 is totally inadequate, yet nearly times more has been set aside for prescribed burning, an issue that still requires considerable investigation.
- . policing.
- . education.

APPENDIX 1. SUBMITTORS

Individuals

Amella, J.J.	Detchon, P.
Ansell, M.G.	Dixon, R.F.
Ashcroft, N.G.	Dowling, A.J.
Babich, P.	Drake, G.K.
Baddeley, G.	Eaton, W.
Barton, M.A.	Edwards, C.J.
Beatson, M.R.	Etienne, F.L.
Beale, B.R. & J.	Everett, I.
Bell, G.R.	Ewing, P.
Bendotti, J. & De Campo, J.	Fernie, T.
Biagioni, A. & S.M.	Frayne R.
Biagioni, B. & S.	Friend, D.G.
Blackburn, G.	Fuge, L.
Bonsignore, T.	George, K.
Bornman, A.	Gill, S.
Branston, A.	Gravett, P.
Broad, N.	Greg, J.D.
Brooy, P.	Halden, D.
Brown, E.S.	Hall, C.M.
Burt, M.	Harwood, D. and Harman, A.
Carpenter, J.	Hawthorn, B.W.
Chadwick, M.J.	Heberle, G.
Chapman, B.A.	Hendrick, S. & Fitzpatrick, K.
Churchward, B.	Hill, S.
Conochie, E. & I.	Holden J.S.
Copestake, P.G.	Hoff, B.C.
Creek, R.G. & S.C.	Hughes, R.D.
Crowe, C.	Ibbs, K.
Danks, A.	Jackson, K.E.
Davies, C.D.S.	Jackson, W.
Dean, G.	Jorgenson, K. & C.T.

Kaeding, W.
 Keene, D.J.
 Kidd, R.
 Kimber, P.C.
 Lindsey, C.P.
 Lush, A.R. & B.M.
 Mathews, R.
 McCaw, L. & Mather, K.
 McConigley, J.
 Miles, L.G.
 Miles, R.
 Milne, K.
 Minchin, R. & L.
 Moore, S.
 Mottram, D.
 Mueller, O.
 Muir, C.R.
 Muir, R.R.W.
 Mulgrave, L.
 Nissen, P.
 Owen, P.
 Pearce, J.
 Pickford, M.
 Poland Dr.
 Purdy, V.G. & P.G.
 Quain, S.J.
 Renshaw, J.
 Richards, B.
 Rignall, V.T.
 Rotheram, I.
 Russell, A.T.
 Ryall, P.J.
 Ryan, C.A.
 Ryan, G.
 Ryan, W.J.

Sawyer, R.A.
 Schultz, B.
 Schur, B.
 Scott, P.
 Sefton, M.D.
 Shuttleworth, D.
 Shuttleworth, S.
 Smith, M.
 Spurge, K.C. & D.K.
 Stewart, K.J.
 Stretch, Hon. B.
 Sundstrom, P.
 Talbot, J.N.
 Taylor, A.
 Turner, J.
 Velterop, G.
 Voutier, R.J.
 Wear, G.
 Weston A.
 White, K.
 Wilson, E.J.
 Wilson, H.
 Woods, F.S.B.
 Zlatnik, D.

Organisations

Apex Club of Pemberton
 Armadale Four Wheel Drive Club
 Association of Mining and
 Exploration Co. Inc.
 Australian Anglers Association
 Australian Conservation Foundation
 Broke Inlet Fishermen's Association
 Bunnings Forest Products Pty Ltd

Organisations (cont.)

Bushwalkers of W.A.	Walpole/Tingledale Soil
Busselton Scout Troop	Conservation Advisory District
Cable Sands W.A. (Pty. Ltd.)	Committee
Campaign to Save Native Forests	Warren District Water Ski Club
Chamber of Mines of W.A.	Warren Riding Club
Coalition for Denmark's Environment	WA Chip & Pulp Co. Pty Ltd.
Conservation Council of W.A.	Western Australian Association of
Denmark Environmental Group	Four Wheel Drive Clubs
Donnelly River Association	Western Australian Naturalist's
Forest Products Association of W.A	Club Inc.
Freshwater Society	Western Australian Recreational
Gardner River Recreation Group	Fishing Council
Greening Australia	Western Australian Trout &
Hang-Gliding Association	Freshwater Angling Association
Indiana Surfriders	Inc
Karri/D'Entrecasteaux Regional	Wildlife Preservation Society of
Advisory Committee	Queensland (Bundaberg Branch)
Keep Our Coast Open Committee	Windy Harbour Board of Control
Kojinup Pony Club	
Leeuwin Conservation Group (Inc.)	
Lightweight Four Wheel Drive	
Club of W.A. (Inc.)	
Lower South-West Delta Kite Club	
Miles Away Safari Tours	
Nangar Wilderness Expeditions and	
Natural History Field Trips (W.A.)	
Northside Double-Diff Four Wheel	
Drive Club	
Perth Bushwalkers Club Inc.	
Pony Club Association of W.A. (Inc)	
Shannon Horse-back Adventures	
South Coast Licensed Fishermen's	
Association Inc.	
South-west Forests Defence	
Foundation Inc.	
Subaru Four Wheel Drive Club	
The Tree Society	
Treenbrook Pty. Ltd.	
Walpole Boating and Angling Club	

Organisations (cont.)

Government Departments

Agriculture Protection Board
Bush Fires Board
The National Trust of Australia
Department of Conservation and
Environment
Fisheries Department
Main Roads Department (Bunbury
Division)
Mines Department
Department of Resource Development
Primary Industry Association of W.A.
Primary Industry Association of W.A.
(Northcliffe Branch)
Primary Industry Association of W.A.
(Beekeepers Section)
Taylor, I. Acting Minister for
Agriculture and Fisheries
Shire of Boyup Brook
Shire of Manjimup
Shire of Nannup
State Planning Commission
Water Authority of Western
Australia
Western Australian Museum