

# Kennedy Range National Park and Proposed Additions

Analysis of Public  
Submissions

to the

Draft Management Plan

Department of Environment and Conservation

for the

Conservation Commission of Western Australia

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## INTRODUCTION

This document is an analysis of public submissions to the Kennedy Range National Park and Proposed Additions Draft Management Plan (the Plan).

The Plan was released for public comment on 19 August 2005 for a period of three months. Late submissions were accepted. A total of 27 public submissions were received. All submissions have been summarised and changes have been made to the Plan where appropriate.

Following the release of the Plan, advertisements were placed in two issues of the local newspapers and two issues of The West Australian, advising that the Plan was available for comment (Appendix 1). The Plan was distributed to State Government departments, tertiary institutions, recreation and conservation groups, local authorities, libraries and other community groups and individuals who expressed interest during the preparation of the draft. The Plan was available for viewing and/or downloading from the Department of Environment and Conservation's (the Department's) NatureBase website, from which electronic submissions could be made. Printed copies of the Plan were made available at the Department's offices in Kensington, Geraldton and Carnarvon and could be inspected at Department's libraries at Woodvale and Kensington, and the libraries and municipal office of the Shires of Carnarvon and Upper Gascoyne.

## ANALYSIS OF PUBLIC SUBMISSIONS

### Method of Analysis

The public submissions to the Plan were analysed by the planning team according to the process depicted in the flow chart (see Figure 1). More specifically:

- ❖ The points made in each submission were collated according to the section of the Plan they addressed.
- ❖ Each point made was assessed using the following criteria:
  1. The Plan *was amended* if the point:
    - a) provided additional resource information of direct relevance to management;
    - b) provided additional information on affected user groups of direct relevance to management;
    - c) indicated a change in (or clarified) Government legislation, management commitment or management policy;
    - d) proposed strategies that would better achieve management goals and objectives; or
    - e) indicated omissions, inaccuracies or a lack of clarity.
  2. The Plan *was not amended* if the point:
    - a) clearly supported the draft proposals;
    - b) offered a neutral statement, or no change was sought;
    - c) addressed issues beyond the scope of the Plan;
    - d) was already in the Plan, or had been considered during Plan preparation;
    - e) was one amongst several widely divergent viewpoints received on the topic and the recommendation of the Plan was still considered the best option;
    - f) contributed options which were not possible (generally due to some aspect of existing legislation, Government or Departmental policy);
    - g) was unclear; or

- h) involved details that are not necessary or appropriate for inclusion in a document aimed at providing management direction over the long term.

The reasons why recommendations in the Plan were or were not changed, and the relevant criteria used, were discussed with each comment. Minor editorial changes referred to in the submissions have also been made.

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

## Number and Origin of Submissions

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

	Number	Percentage
Individuals	7	28
Community Organisations	9	36
Companies	2	8
Government (State)	6	24
Other Organisations	1	4
<b>TOTAL</b>	<b>25</b>	<b>100</b>

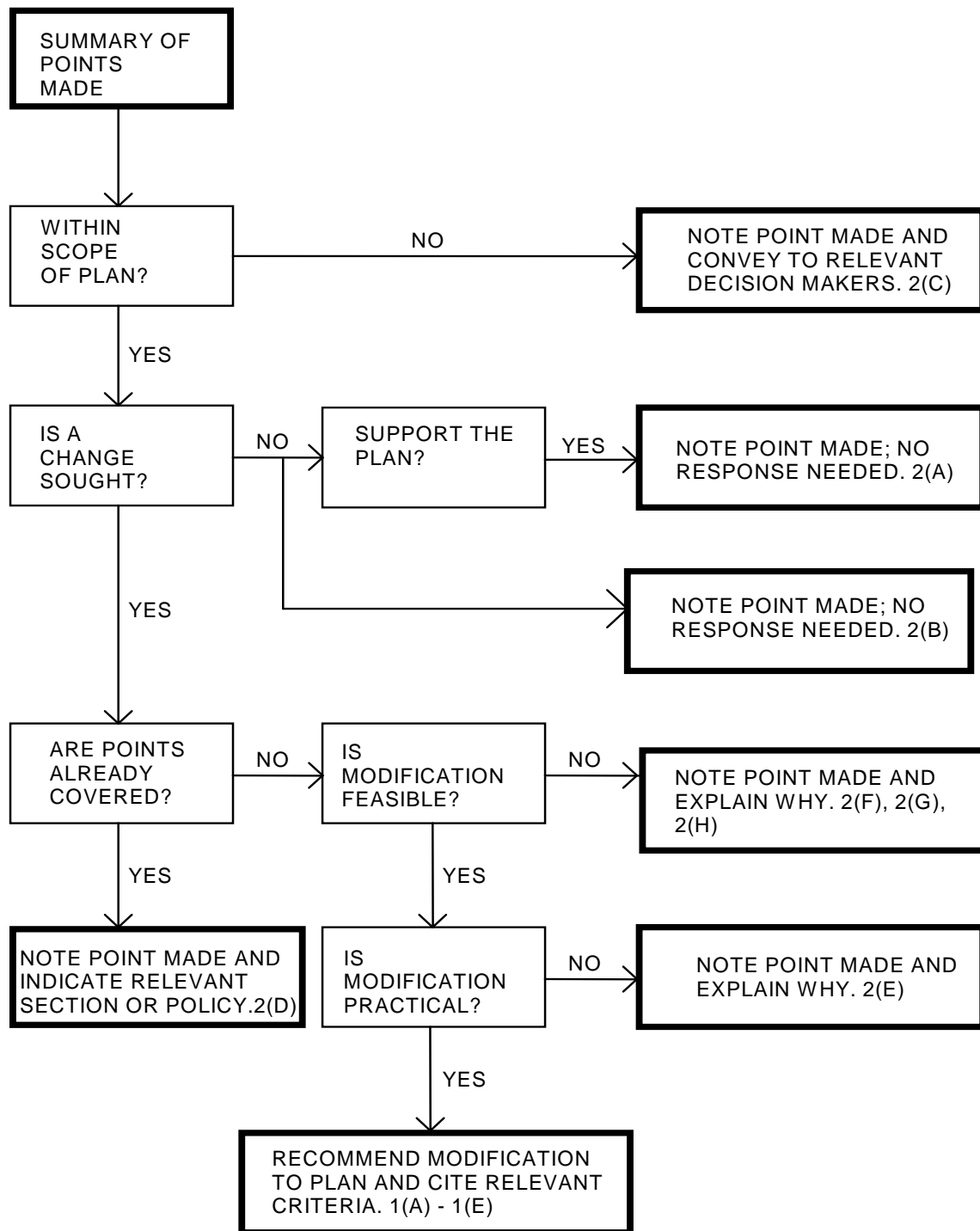
A list of submitters to the draft plan is provided at Appendix 1.

## ANALYSIS TABLE

The analysis table (Table 1) contains:

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

**FIGURE 1 - ANALYSIS PROCESS**



**TABLE 1: SUMMARY OF PUBLIC SUBMISSIONS**

Comment No.	Summary of comment	Discussion/Action Taken	Criteria
1	<p><b>General Comments</b> We wish to support the Department in its development of the Plan</p>	Noted.	2(a)
2	The plan appears to be reasonably balanced in the areas of environment, social and economic considerations	Noted.	2(b)
3	The Plan will help preserve the park's natural values.	Noted.	2(a)
4	The Plan is well considered, given the potential for increased tourism activity.	Noted.	2(a)
5	We congratulate the Department on this detailed plan.	Noted.	2(a)
6	Implementation of the Plan will result in improved road access, more interpretive materials and signs, an increase in day visit areas, (potentially) greater access to the dunes on top of the range and add a significant campground on the western side.	Noted.	2(b)
7	We are impressed with the level of access both on the west and across the top.	Noted.	2(a)
8	The Department's limited advertising (it is even difficult to find references to the proposals on the website - it is not listed on the section 'specific matters open for public comment' - is of concern. This likely lack of penetration into the public consciousness (and likely silence) should not be construed as assent - particularly in relation to 'two vehicle minimum' across the top of the Range.	Distribution is considered during plan preparation. The plan was released for a 2 month public comment period and advertised by way of media release and government gazette, and in the newspapers The Western Australia, Geraldton Guardian and Northern Guardian, and on the internet site NatureBase (Have Your Say and Specific matters open for public comment).	2(d)
9	You talk about natural values, conservation values and biodiversity values. Needs consistency of words across plan.	Noted and plan amended.	1(e)

Comment No.	Summary of comment	Discussion/Action Taken	Criteria
10	Photos would be helpful, indicating proposed sites and locations as well as an indication of terrain.	Unable to due to size and cost of plan.	2(c)
11	It was easy to obtain a copy of the Plan.	Noted.	2(b)
12	I received late/very late notice of the Plan.	Noted.	2(b)
13	It was easy to understand the Plan.	Noted.	2(b)
14	Ease of understanding the Plan - neutral.		2(b)
16	I agree that the Plan covers the main issues.	Noted.	2(b)
17	I disagree that the Plan covers the main issues. It requires further investigation informing travellers about private nature of land being traversed; biosecurity; and, effects on business operators.	Visitors are accessing the Park via both dedicated roads and undedicated roads through pastoral stations, not private land. The plan is making recommendations to formalise access. Biosecurity issues posed by visitors entering the Park are considered small and manageable, particularly in relation to the traffic using the Mullewa Road and the Ullawarra Road. Information shelters in key areas include information on roading, safety, the requirement to respect pastoral infrastructure and stock and other educational messages.	2(d)
18	I agree that the Plan contains sufficient information to draw conclusions.	Noted.	2(b)
19	There is never too much information put into these plans - they are often the only source of local knowledge we can get.	Noted.	2(b)

Comment No.	Summary of comment	Discussion/Action Taken	Criteria
20	I would like to register my disappointment at the apparent failure of your Department to make any form of contact with me. I assumed that I was a key stakeholder.	Exploration and mining in WA is administered by the Department of Industry and Resources (DOIR) and DEC considered that DOIR represented the interests of holders of prospecting licences, exploration licences and mining leases over the management planning area. However, this management plan's process has been amended to include these interested parties as stakeholders by including them in the distribution stakeholder database for this plan.	2(f)
21	We commend the spirit of the Plan and wish you all the best in its implementation.	Noted.	2(a)
22	<b>PART A: INTRODUCTION</b> I am supportive of proposals in this section.	Noted.	2(a)
23	<b>Key Values</b> "Unusual and diverse geology, including marine and plant fossils". It is not clear what this means. The geology is possibly unusual in the region insofar as the Range is an upstanding plateau in an surrounded by plains with scattered low, small, rolling ranges. Rugged faces that are attractive scenically surround the plateau, and the geological reason it is elevated appears to be a relatively recent fault uplift.	Noted and plan amended.	1(e)
24	The proposed extensions do contain an unusual geological element, which is the presence of mookaite and peanut wood. These are such unusual semiprecious gemstones that they are actually unique to the former pastoral lease area.	Noted.	2(b)



Comment No.	Summary of comment	Discussion/Action Taken	Criteria
25	The Palaeozoic to Cainozoic stratigraphic units present in the existing park and proposed extensions from highly fossiliferous to sterile. However, the area does not have any notable or unusual geology. The fact that there are fossils does not in itself make this intrinsically more important than many other fossiliferous areas.	This area is unusual and unique in having such a thick, extensive and continuous Early Permian section that is not otherwise exposed to such a degree in the Carnarvon Basin. Such an accessible outcrop succession allows for detailed and comprehensive palaeontological and sedimentological studies that are important for unravelling Australia's geological evolution. Rich Phanerozoic fossil sites are not common in W.A., which makes the Permian rocks of the Kennedy Range significant.	1(e)
26	"Diverse scenic beauty". Can a more indicative description be provided than simply "diverse" be used? Generically, the more beautiful aspect is likely to be regarded by more people as the upraised plateau surrounded by rocky faces and breakaways, and this does not imply a multiplicity of attributes.	The 'scenic' landscapes represented comprise 1) the plateau with its cliff faces, breakaways and its sand-dune top, and 2) the surrounding flattish rangeland with ephemeral rivers and streams.	1(e)
27	<b>PART B: MANAGEMENT DIRECTIONS AND PURPOSE</b> <b>Vision</b> We support the vision statement, but would change "assisted by the traditional custodians" to "with full involvement of the traditional custodians" or similar.	Noted and plan amended.	1(b)
28	Development of economic tourism would appear to be contrary to improving natural values. While it can be accepted that grazing by feral animals decreases the variety and density of native vegetation, encouragement of tourism will not generate the opposite effect; with the building of more and better roads and bringing in more people, the feeling of remoteness and peace will not continue. However, to make the scenic beauty available to more people is supported.	The strategies for access and development of facilities as proposed are consistent with retaining remote attributes and experiences, leading to appreciation of natural values.	1(d)
29	<b>Management Arrangements with Aboriginal People</b> Might need more information on Native Title.	Noted.	1(b)
30	Our traditional ties with the Range go back a long way and we want formal recognition as traditional owners and custodians.	The issue of formal recognition is a matter to be addressed at some stage under the Native Title Act.	2(f)

Comment No.	Summary of comment	Discussion/Action Taken	Criteria
31	As far as I know, there was no consultation with acknowledged traditional owners on this Plan and all agreed that future UCL plans must include us.	The Department is committed to working in partnership with the native title claimants associated with the planning area. Consultation has occurred with the claimants during the preparation of the plan and the Department is committed to furthering this relationship.	2(d)
32	We want future plans to include aspects such as Aboriginal Sites identify training/development in place and Park Warden programs for our younger generation and other aboriginal people in the Gascoyne.	The Department conducts various programs to promote Aboriginal involvement including MATES (Mentored Aboriginal Training and Employment Scheme) and the Department will talk with the claimants in relation to Aboriginal sites. It is not the role of a management plan to specify Aboriginal training and employment requirements.	2(h)
33	We are aware of the possible extinguishment of native title. We have told the Department that if we are entitled to compensation then a Joint Management partnership is what we want. We want this agreed partnership, which includes joint management, to be used as a "blue-print" for all future Departmental land management and land acquisitions in the region.	The Department is committed to working in partnership with the native title claimants associated with the planning area. Consultation has occurred with the claimants during the preparation of the plan and the Department is committed to furthering this relationship.	2(a)
34	Even though we were not consulted when the Park was created we want a real say in the way our traditional country is managed and cared for.	The Department is committed to working in partnership with the native title claimants associated with the planning area. Consultation has occurred with the claimants during the preparation of the plan and the Department is committed to furthering this relationship. The creation of conservation reserves does not necessarily extinguish native title.	2(a)
35	<b>Proposed and Existing Tenure</b> We welcome the purchase of the additional 177 377 hectares and support its reclassification to national park	Noted.	2(a)

Comment No.	Summary of comment	Discussion/Action Taken	Criteria
36	We fully support the speedy conversion of the proposed additions to national park status and see no reason why the conversion should wait until the finalisation of the Plan.	Change in reservation will require consultation with the Department of Industry and Resources with respect to mineral prospectivity and Aboriginal groups with respect to any native title interests.	2(f)
37	Is it possible to have 6 of the 8 adjoining leases under Section 33(2) under the Native Title provisions?	Yes. Land tenure accords with Government policy.	2(d)
38	We are opposed to the proposed additions to the national park, particularly to the west, because of the presence of mineral and petroleum titles and significant mineral and petroleum potential.	The plan is consistent with current Government policy regarding mineral and petroleum exploration and development.	2(d)
39	Is the land shown on the published maps still freehold, leasehold, Government-owned land or UCL and has any of the land been vested in any Government Department?	The purchased land as shown on Map 1 comprise the Mooka Pastoral Lease and parts of seven other adjoining leases. Six of the eight purchases have been placed under the control of the Department under section 33(2) of the CALM Act whilst two (Mooka and part of Minnie) remain as ULC. All areas will be managed by the Department as if they were already national park whilst the process to add them to the public conservation estate proceeds.	2(d)
40	Although we are not able to support single-use conservation reserve status, we would be keen to progress consideration of a reserve that provided a guarantee of reasonable and practical future access for resource exploration and extraction.	The plan is consistent with current Government policy regarding mineral and petroleum exploration and development.	2(d)
41	".....managed as NP whilst the process to add them (proposed additions) to the public conservation estate proceeds." This sentence assumes the areas will have to be added. However, due process to the support the State Sustainability Strategy requires consideration of the economic and social aspects of the area. Ongoing mineral and petroleum exploration will be required in the proposed additions for many years, and the new areas should not be added until that is completed. We object to the non-negotiable expression.	The plan is consistent with current Government policy regarding mineral and petroleum exploration and development.	1(b)

Comment No.	Summary of comment	Discussion/Action Taken	Criteria
42	I fail to understand why the Park has been made so big. Large areas are of little value or interest - i.e. full of rocks and goats. I think most of the Park should be left as it with limited development in the main areas of interest.	The proposed additions add to the under represented conservation reserve for the Wooramel sub-region of the Carnarvon bioregion and poorly represented land systems within the reserve system.	2(d)
43	Absolutely support the acquisition of surrounding stations for additions to the Park - especially for the reasons given in the Plan.	Noted.	2(a)
44	Most of the draft plan makes good sense to me but I object to the necessity of converting the existing Mooka pastoral lease now held by the Department into national park as most if not all of the proposal in the draft plan can be implemented by the Department. Therefore I request that the Department: 1. remove references to converting Mooka Station to national park and does not persevere with any actions to implement such a change; 2. supports community interest and attachment to fossicking and mining of mookaite; and 3. ensures it does consult with key stakeholders and takes into account their interests and livelihood requirements prior to any decision-making regarding the future and land tenure of the area.	All proposed additions have been purchased by Government for conservation purposes as part of State and Australian Government commitments to establish a comprehensive, adequate and representative system of conservation reserves. The plan is consistent with Government policy regarding mineral and petroleum exploration and development, and existing tenements within the Park and within the proposed additions to the Park retain all rights to mine and fossick. Key stakeholders have and will continue to be consulted as community awareness and support is essential for the implementation of the plan.	2(d)
45	The small section of Lyons River Station which has shells, fossils appears to have been taken over by National Park.	All proposed additions have been purchased by Government for conservation purposes as part of State and Australian Government commitments to establish a comprehensive, adequate and representative system of conservation reserves. The acquisition of part of Lyons River creates a very important buffer zone to protect the eastern escarpment and will be advantageous for a successful baiting regime for feral pests if critical weight mammals are to be reintroduced.	2(e)

Comment No.	Summary of comment	Discussion/Action Taken	Criteria
46	<p><b>Performance Assessment</b></p> <p>We strongly support the conversion of the Conservation Commission into a Biodiversity Commission. Our ideal model for the new Commission encompasses, among other things, a leadership role that expands into off reserve and marine biodiversity issues. In that context, we strongly support increased funding for the new Commission to enable broader and more effective delivery of its current and future management plan performance assessment role.</p>	Noted.	2(c)
47	<p><b>Naming of Sites and Major Features</b></p> <p>We strongly support renaming the Park and/or any sites within it with local indigenous names, if any proposal to do so from relevant traditional custodians are received as part of this submission process.</p>	Noted.	2(a)
48	<p><b>PART C: MANAGING THE NATURAL ENVIRONMENT</b></p> <p>I am supportive of proposals in this section.</p>	Noted.	2(a)
49	<p>The Department needs to consider the environment outside the Park boundary due to biosecurity risks created by encouraging visitors through private business premises. This can be rectified by moving the access from the south to the Mooka Homestead to become the gateway of the Park, the road would then run along the newly proposed fence, hence alleviate the disruption and biological risk being created by the Department.</p>	<p>Access via dedicated road (road no. 9485) will be retained as it provides a relatively direct, durable, maintainable, safe access for visitors, pastoralists and mookaite miners to the western base of the Range. The biosecurity issues posed by this road transecting Jimba Jimba are considered small and manageable, particularly in relation to the much greater traffic using the Mullewa Road. The proposed more western access through Mooka could be considered as an additional roading option, but not as a replacement for road no. 9485.</p>	1(a)
50	<p><b>Biogeography</b></p> <p>We strongly support continued reserve creation and/or 2015 excisions with the view to increase reserve representations in this areas to the minimum 15% level at least. We should note that much more work needs to be done so the IBRA can be finalised, which would allow CAR targets for this part of WA to be accurately considered.</p>	Noted.	2(a)

Comment No.	Summary of comment	Discussion/Action Taken	Criteria
51	<p><b>Geology, Geomorphology and Land Systems</b></p> <p>The "Southern Carnarvon Basin" is not a recognized geological unit; the area is within the Merlinleigh Sub-Basin of the Carnarvon Basin.</p>	Noted.	1(e)
52	References to "large" and "vast" features are not realistic descriptions.	Noted.	1(e)
53	Sedimentation was not only at 270 Ma but continued intermittently from then until some 50 Ma. In addition to the Kennedy Group, there are the Wooramel Group, Bryi Group, and the Winning Group.	Noted.	1(e)
54	Rock types are not limited to sandstone and siltstone, but also include shale, limestone, chalk glauconitic siltstone and radiolarite.	Noted. The older and younger rocks include these types of lithologies.	1(e)
55	There is a reference to "much of the overlying rock", but ALL of the rock that previously covered the present plateau has been eroded off.	Noted and plan amended.	1(e)
56	There is a significant omission of any comment of the geological evolution of the current landforms and surficial material, of the important structural geology or of the minerals and rocks.	Partially covered under land system information and the Climate, Soil and Catchment Protection.	1(e)
57	With reference to "the earliest known occurrence of Banksia cones in Australia", fossilized <i>Banksia</i> cones exist in Eocene silcrete in intermontane sedimentary deposits in central Australia. These would have a similar age to the Kennedy Range deposits, any may actually be older.	The Kennedy Range is the oldest known Banksia cone site in Australia (Professor Robert Hill, School of Earth and Environmental Sciences, University of Adelaide, pers. comm. 16 March 2006).	1(d)
58	With reference to "removal of fossils is illegal and palaeontological research must be authorised" - Section 115 of the Mining Act authorizes the Director to Geological Survey and his agents to enter upon any land for the purposes of geological research, and that would over-ride the CALM Act and Regulations. Areas outside of the NP are not Crown Reserves, and therefore prospecting, fossicking and sampling as well as geological investigations of titles can be conducted by virtue of a Miners Right.	Noted and plan amended.	1(c)

Comment No.	Summary of comment	Discussion/Action Taken	Criteria
59	With reference to mookaite and peanut wood being the only semiprecious gemstones - this underemphasizes and almost belittles the importance of these two rock-types that are of importance to the whole world. There are the only know semiprecious gemstones.	As the planning area and surrounds is the only place in the world where mookaite and peanut wood is found, their protection from overcollecting and mining, as part of Australia's geological heritage, is considered appropriate.	1(e)
60  61	<p><b>Climate, Soil and Catchment Protection</b> Congratulations on explicitly factoring climate change into this plan.</p> <p>In reference to greenhouse conditions - there appears to be a presumption that climate change is solely caused by anthropogenic greenhouse effects, and that climate change must be bad. Climate change has occurred throughout geological time, and life has evolved with it. The plan should identify broadly how management can take advantage of likely future changes. For example, the plan identifies a number of potentially detrimental processes that is states are related to climate change, but those processes are operating now.</p>	<p>Noted.</p> <p>While the earth's climate is affected by many factors, enhanced Greenhouse effect is becoming an increasingly significant influence on regional climate conditions world-wide. Although ecosystems have evolved with or as a result of past climate variation and change, the current rate and projected scale of climate change is greater than historical measurements and research imputations of climate over periods of tens of thousands of years past. Management has the objective of enabling stable ecosystems and landscapes to evolve as climate conditions change while ensuring that key biodiversity values are not lost. This management will be sensitive to benefits for biodiversity that climate change may deliver, but no such benefits are evident at this time.</p>	2(a)  1(a)
62	Under hydrogeology there is reference to "very deep water table" but then refers to springs. The sediments below the area are about 4000 m thick and contain some supplies of groundwater, although much is saline. That groundwater can be described as deep. However, these have no relations to the springs that would be fed by groundwater in aquifers above the level of the surrounding plains in the Kennedy Range itself, and these should be described as shallow.	Noted and plan amended.	1(e)
63	<p><b>Native Plants and Plant Communities</b> In terms of the 4 main types of vegetation, I suggest you talk specifically about dunefields on top of the Range and ignore the others.</p>	Noted.	2(d)

Comment No.	Summary of comment	Discussion/Action Taken	Criteria
64	Dunefields is not a type of vegetation. Dunes may have distinctive vegetation, but in themselves cannot be termed as a vegetation type.	Noted and plan amended.	1(e)
65	Could you publish a full botanical list for the Park in the final plan. There are many <i>Eremophila's</i> and <i>Ptilotus</i> spp. that I couldn't identify.	Publishing of list within final Plan is outside its scope. Flora list mailed to submitter on the 29 November 2005	2(c)
66	<p><b>Native Animals and Habitats</b></p> <p>There is no mention of frogs being recorded from the Park, despite the presence of creeks, pools and permanent springs. If the frog <i>Pseudophryne douglasi</i> occurs in the park, this would be an important finding as they are known only from the Hamersley Range in the Pilbara, and widely isolated populations in the Cape Range, Barlee Range and Mt Augustus. This species only occurs where permanent water is available, so the western springs of the Park would be an ideal place to look (and other more common species must surely occur in the Park).</p>	Noted and plan amended.	1(a)
67	It may be possible to fence Mooka Spring from goats. Springs in Cape Range where <i>P. douglasii</i> has been found were severely trampled by goats. These frogs rely on water and vegetation to provide food and shelter. Fencing parts of Mooka Spring would greatly enhance long-term survival of both plants and animals.	The preparation and implementation of a feral goat control strategy is a priority for this plan and fencing of sites and springs will be considered.	2(d)
68	We only support the extension of Western Shield if it can be scientifically demonstrated that 1080 tolerance across a wide range of different fauna taxa (including reptiles and amphibians) was comparable to that in the south west.	Testing of 1080-tolerance in WA has shown that high levels of tolerance occur outside the current distribution of 1080 bearing <i>Gastrolobium</i> plants (these plants are largely restricted to the southwest) - species have or have had distributions extending into the southwest of WA thus the genes for 1080-tolerance can extend beyond the influence of 1080-bearing plants. It is unlikely to be a non-target risk issue with extant fauna in the Kennedy Range and any species listed as candidates for reintroduction are sourced from WA populations that are 1080-tolerant. The method of delivery of 1080 is also important to reducing non-target risks and current research is looking at the best methods to achieve this.	2(b)



Comment No.	Summary of comment	Discussion/Action Taken	Criteria
69	We do not support baiting for dingoes, even if they supposedly threaten adjacent pastoral enterprises.	Noted.	2(f)
70	We support the capping of the old uncapped mining drill holes that acts as traps for native animals, and suggest that DoIR fund that work.	Noted.	2(a)
71	With reference to the uncapped mining drill holes acting as traps for native animals - this implies that there could be numerous occurrences without giving any indication of the quantity. DoIR is not aware of any intensive exploration drilling being conducted; there are a few former oils wells and a small number of mineral exploration holes, but information to hand does not support this contention.	Noted.	2(e)
72	<p><b>Threatened Ecological Communities</b></p> <p>I have been told informally that an information sign (southern end) may be placed too close to the springs and high visitation may impact the springs.</p>	The southern interpretation sign is not close to the springs. The signs raise awareness of the natural values of the park, including the springs.	2(d)
73	<p><b>Environmental Weeds</b></p> <p>Control of buffel grass will require long-term commitment to herbicide application and monitoring within the planning area. Some stations are actively sowing buffel. Weed control will require on-going liaison with surrounding landholders to ensure buffel is not inadvertently introduced into new areas, or re-introduced into existing areas.</p>	Noted.	2(d)
74	We support the removal of female date palms (and selected removal of males) for controlling date palms.	Noted.	2(a)
75	We strongly oppose the retention of any serious weed, such as date palms, for "aesthetic or historical" reasons, whether in this Park or in other reserves such as Millstream-Chichester.	Noted.	2(e)

Comment No.	Summary of comment	Discussion/Action Taken	Criteria
76	What is the Draft Environmental Weed Policy you refer to?	The objective of this proposed Departmental policy is to achieve the safe, effective and coordinated management of environmental weeds on land managed by the Department, and in accordance with established priorities and consistent with the Department's conservation objectives.	2(b)
77	You may need to refer to the State Weed Plan.	The State Weed Plan (SWP) is a document prepared by the Department of Agriculture. As the Environmental Weed Strategy for WA (EWS) was DEC's contribution to the SWP, it is considered for management purposes that the EWS is more relevant to our mission.	2(d)
78	Managing weeds spp. is a priority - to preserve native plants	Noted.	2(a)
<b>Introduced and Other Problem Animals</b>			
79	Goats are identified as one of the most serious threats to the Park's biota and yet there does not appear to be a strong management aspect aimed at eradicating them or, at the very least, dramatic minimisation of their impact. This should be considered a priority for the threatened community of Mooka Spring.	The preparation and implementation of a feral goat control strategy is noted as a priority for this plan. As part of this and since the draft plan was published, in February 2007, the Department carried out both an aerial cull over 5 days and a follow-up ground shoot.	2(d)
80	We agree goat control is vital to maintain/improve the environmental values of the Park and believe they have no place in National Parks. Control will be difficult and extensive on-going partnerships with surrounding landholders will be vital to the success of controlling goat numbers.	Noted.	2(a)
81	We continue to oppose the recognition of goats as authorised stock. We agree that this classification is obviously increasing the feral goat pressure in the Park.	Noted.	2(f)
82	The Plan discusses past goat management, but not what is planned for the future. We are keen to be consulted about this issue when more detailed strategies are developed. It should be noted in the meantime that we support targeted shooting in areas where goats can avoid trapping and	The preparation and implementation of a feral goat control strategy is a priority for this plan.	2(d)

Comment No.	Summary of comment	Discussion/Action Taken	Criteria
	mustering.		
83	Western Shield has 5 objectives of which baiting is one.	Noted.	2(b)
84	The Plan refers many times to feral goat control. I would like to see sections of the Park open to hunting during non-tourist time" or "closed to tourist" areas.	Recreational hunting is generally not permitted on lands and waters managed by the Department. The Department may authorise the shooting or trapping of declared vermin and feral species as one management control strategy. Targeted shooting is discussed.	2(f)
85	Hunting is permitted in national parks and in some other states of Australia to control feral animals and has been proven as a successful management resource. This could be done in the Kennedy Range either through a permit system or open season managed by the Department.	Recreational hunting is generally not permitted on lands and waters managed by the Department. The Department may authorise the shooting or trapping of declared vermin and feral species as one management control strategy. Targeted shooting is discussed.	2(f)
86	We have a genuine interest and significant experience in assisting with controlling feral animal numbers in the environment and acknowledge their detrimental effects on the rangelands and flora and fauna, particularly goats. We can provide expert, professional, cost-free services and considerable resources towards assisting in goat control and consider targeted shooting as one control strategy.	The preparation and implementation of a feral goat control strategy is a priority for this plan. Targeted shooting will be considered in the development of this plan.	2(a)
87	<b>Fire</b> We support the concept of "fine grain mosaic" prescribed burning provided that long unburned areas are factored in; even areas that will not be subject to prescribed burning at all, where appropriate (the cliff and gorge habitats referred to, for example).	Documenting the fire history of the planning area and conducting a wildfire threat analysis to determine management priority actions has been identified in the planning process. Unburnt areas would be considered as part of this process.	1(a)

Comment No.	Summary of comment	Discussion/Action Taken	Criteria
88	In relation to the concept of "fine grain mosaic" we are very concerned about how this theory is implemented in practice, however, especially in the South West of WA. In recent years our concerns about these practices, and our attempts to make the related decision-making process more transparent, have largely been resisted.	The fine grain mosaic concept is based on the following: 1. Evidence that in the past desert Aboriginal people used fire frequently, which together with lightning fires, resulted in a mostly fine scale mosaic of patches of vegetation at different seral stages (see Burrows et al 2006 - Conservation Science Western Australia). 2. Growing scientific understanding and evidence that a landscape of a variety of seral stages (or times since last fire) provides greater diversity of functional habitats than one which is less heterogeneous, or contains large areas of the same seral stage (either recently burnt or long unburnt). Thus, greater diversity of seral stages (floristic and structural diversity, hence habitat diversity), by definition, means greater biodiversity because the term 'biodiversity' embraces habitat diversity and structure as well as species richness. It is implemented by regular and planned patch burning, which over time, will result in a range of post-fire stages from recently burnt to long unburnt.	1(b)
89	We strongly support the identification and protection of fire sensitive habitats.	Noted.	2(a)
90	More information of fire regimes is suggested.	Noted and plan amended.	2(a)
<b>PART D: MANAGING CULTURAL HERITAGE</b>			
91	Hopefully more information boards and indicators of meaningful locations and sites with explained history and heritage importance will be considered.	Noted.	2(d)
92	I am supportive of the proposals in this section.	Noted.	2(a)

Comment No.	Summary of comment	Discussion/Action Taken	Criteria
93	<p><b>Indigenous Heritage</b> We are pleased with the efforts made by the Department to address and manage Indigenous heritage places, however, a more detailed and comprehensive study of Aboriginal heritage of the Park is clearly required.</p>	Noted. The plan recognises the need for further work in the area of indigenous heritage.	2(d)
94	We suggest that a joint working group from the Department, YLASC and DIA could liaise on formulating how more detailed studies of the Park should be undertaken.	Noted.	2(h)
95	Mundatharrda is the Maia-Yinggarda name for the Kennedy Range.	Suggested names for sites and features will be considered over the life of the plan. Changes to formal names requires the approval of the State Geographic Names Committee on recommendation made jointly by the Department and the Conservation Commission.	1(c)
96	Most of my family were born on nearby Middalya Station. Our name for Middalya is Midda-Mia which shows very strongly the Maia tribe once occupied this land.	Noted.	2(h)
97	Middalya Station owner told us his grandfather D.J. Hearman, in the early 1800's took a group from the tribe to work for him. My grandfather was part of that group.	Noted.	2(h)
98	We have set up an Indigenous Tourism venture in the Range and some of our young people are involved in a full time TAFE tour guide course at Burringurrah Community. It is vital that we, the traditional owners have a say, to be consulted, to be included in the Parks final development of the Plan.	To progress the involvement of Aboriginal people with a connection to the Park in the management of the planning area, the Department is working with the Yamitji Land and Sea Council, and the Gnulli and Thudgari Native Title Claim working groups.	2(h)
99	Are any Aboriginal sites (i.e. engravings near the Temple Gorge campsite) open to the public? They should be and with interpretive signage.	There are a number of sites in the Temple Gorge area. We are liaising with local indigenous custodians in relation to the appropriateness of publicising and interpreting these sites.	2(d)

Comment No.	Summary of comment	Discussion/Action Taken	Criteria
	<p><b>Non-indigenous Heritage</b></p>		
100	The Mooka area has a very significant heritage because it is the only site on Earth where mookaite comes from. This fact should be recognised and noted in the Plan. It is considered that part of that heritage is to ensure the community continues to have access to the raw material.	This section relates to cultural heritage. The significance of mookaite is addressed under the natural environment section.	2(d)
101	When the area was explored, reports of the area were unfavourable for pastoral potential, yet to Geologists, Lapidary members and the general public who appreciate beauty of mookaite, peanut wood, black/grey petrified wood and fossils all have a lot of value.	The diverse geology is a key natural value identified in the plan.	1(e)
102	Kennedy Range 1 Oil Well could be regarded as a heritage site because it was a consequence of a pioneering effort by WAPET in 1964.	Kennedy Range 1 is one of many unsuccessful oil exploration wells and this does not by itself imply heritage significance. It is a site for an interesting story and will be considered as part of the existing interpretation program.	2(e)
103	Interpretive signage should be erected at the homestead sites.	Future interpretation over the life of plan will consider the cultural heritage of the planning area including the homesteads.	2(d)
104	When discussing cultural values of the area it should be taken into account that mookaite is unique. It is not known to occur anywhere else in the world.	The significance of mookaite is addressed under the natural environment section.	2(d)
105	<p><b>PART E: MANAGING FOR VISITOR USE</b>  <b>Regional Tourism Context</b>  We will continue to use sport and recreation products to promote the Park and develop tourism and generate economic activity in the Region.</p>	Noted.	2(b)
106	<p><b>Recreation Opportunities</b>  Tourism development in the Park is encouraged in that it will increase recreational opportunities.</p>	Noted.	2(a)

Comment No.	Summary of comment	Discussion/Action Taken	Criteria
107	We support the suggestion of rationalisation of camping areas, to assist in the overall improvement of amenity and enhancing risk management and control, on the basis that net availability will be increased or maintained.	Noted.	2(a)
108	Associated with greater access for two wheel drive vehicles is the ability to camp, walk, cycle or enjoy other opportunities to recreate within the Park boundaries.	2WD access is confined to the base of the eastern escarpment.	2(b)
109	We recognise that the majority of recreation opportunities may only be accessed for four wheel drive vehicles and encourage the Department to consider positively continued reasonable access to tracks within the Parks.	Noted.	2(a)
110	The Park is valued as a sport and recreation venue for the hosting of events and conduct of activities - i.e. The Gascoyne Dash (off road racing event) has been successfully run out of Bidgemia Station, Gascoyne Junction and along the Gascoyne River to Carnarvon. Potential products to be developed may include - abseiling, orienteering, extreme sports, and triathlons.	Management of organised non-commercial leisure and educational activities and/or special events conducted in accordance with Policy Statement 18- <i>Recreation, Tourism and Visitor Services</i> .	1(b)
111	Inclusive/exclusive visitor experience - with more and more people pursuing outdoor adventure activities, we urge the Department to maintain reasonable access and in fact pursue resources to encourage greater access to opportunities in the Park.	Planning is underway to enhance the visitor facilities in the Park, including new campgrounds and walking trails. Facilities will be developed in response to management pressures and funding for development will be sourced from DEC's capital works program and potentially from external funding sources.	2(a)
112	Provision of extensive camping facilities at designated areas should also consider the impact of campfires on the availability of 'dead wood'. This is critical resource for many reptiles and mammal species, as well as invertebrates, and the denudation of areas around campfires is a very major anthropogenic effect on biota.	Noted and plan amended.	1(b)
113	We support "no campfires allowed".	Noted.	2(a)

Comment No.	Summary of comment	Discussion/Action Taken	Criteria
114	We strongly support the concept of creating gazetted wilderness areas in the Park, and therefore we strongly support keeping the management proposals in the final plan consistent with that future possibility.	Noted	2(a)
115	We support the proposal to limit access and ban camping at Mooka Spring.	Noted.	2(a)
116	We congratulate the Department and the Commission for considering innovative approaches to dealing with carrying capacity in sensitive areas (on the top of the Range) such as the permit system suggested. We suggest key components of the permit system include: maintaining 4WD only status; allowing for seasonal closures in appropriate circumstances; on-line booking; conducting a baseline track condition survey; and a two year review of capacity.	Noted. All points agree with plan.	2(a)
117	We recommend that Aboriginal heritage surveys are conducted prior to any proposed development areas (camp grounds, car parks, roads etc).	In accordance with the Aboriginal Heritage Act, the Department aims to protect existing and potential heritage sites. All proposals to undertake public works are referred to and discussed with the relevant Native Title claimants and authorities.	2(d)
118	You talk about moving Temple Gorge campsite but don't note the advantages the new site will bring. I suggest you do.	Noted and plan amended.	1(b)
119	The KPI's include a target of 'no reduction in visitor satisfaction' but does not say how this will be managed? - e.g. conduct surveys.	Noted.	2(h)
120	The Plan maps wilderness but does not delineate exactly where wilderness area will be created - surely not all the area identified will be set aside.	Delineation of the wilderness area is not yet possible until an analysis of the wilderness values on the top of the Range is done. The map is indicating the total area from which a candidate area could be chosen.	1(e)
121	Consideration should be given to potential for climbing and abseiling within this environment as a recreational activity that is approved and not just on a case by case basis.	Noted and plan amended.	1(b)



Comment No.	Summary of comment	Discussion/Action Taken	Criteria
122	Plans should be drawn up and tested for a real life lost person or injured person incident. This remote area has significant hazards, and it is only a matter of time before an accident occurs, especially with 4 x 4 drivers accessing these areas.	In the event of an incident, the coordination of search, rescue or recovery operations is the responsibility of the Western Australian Police Force. The provision of safety information and the preparation of a Visitor Risk Management Plan are priorities for this plan.	2(d)
123	I do not agree with camping fees.	Visitor fees, which include entry and camping fees, may be charged to assist with conservation and park management, including maintaining and improving visitor facilities and services. This is also consistent with Government policy.	2(f)
124	I think any development should be kept to a minimum.	Noted.	2(b)
125	I object to being told where to camp. I do not want to camp in a bay next to people I don't know. I choose to camp to get away, and be with a select few in an unspoiled area. What is a camp without a camp fire? Don't be too restrictive.	The Department will provide a range of camping opportunities that will service various visitor types and minimise environmental impacts. For the protection of the park, campfires are prohibited in the Park with the exception of the western side of the Range and potential communal campfires at managed camping areas.	1(e)
126	The Department has proposed two day use sites on private land well outside the Park area without consulting the land owners.	Noted and plan amended. The sites referred to are actually information shelters rather than day-use. The shelters are located in the road reserve and provide information about visitor safety and access.	1(e)
127	The Department has erected inappropriate signage for the southern access road as it fails to inform tourists/travellers that the road is only accessible by 4WD until at least 3km in whereby it is too late as the road has a heavy crossing at 1.7 km. The following proposal would provide an acceptable outcome: 1. Removal of the two day use sites from the Plan would greatly decrease the inhibiting nature of the Plan to the landowners. 2. Changing the gateway to Mooka Homestead would allow for a great opportunity to raise revenue for the Department, given the current trend in Government assistance to the Department for it's core objectives.	The Department will liaise with the Shire of Upper Gascoyne to request a 4WD ONLY sign be erected on road no. 9485 close to its junction with the Mullewa Road. The two day use sites referred to are actually information shelters rather than day-use (refer to comment above). The suggestion to use a more western access route through Mooka could be considered as an additional roading option, but not as a replacement road for dedicated public road 9485.	1(e)

Comment No.	Summary of comment	Discussion/Action Taken	Criteria
128	You do not mention any interest in viewing mookaite or mooka creek area.	Noted and plan amended.	1(e)
129	You mention Spring and Pharoah Well (Spring) but I wonder with the road/track condition whom else has seen, camped or picnicked at these sites.	The western side of the Kennedy Range is becoming increasingly well known to many 4WD owners, particularly with the promotion of the self-drive outback experience being promoted in the Gascoyne Murchison region and the development of this plan.	2(d)
<b>Access Across the Top of the Range and Issue of Permit</b>			
130	The notion of limited numbers, and group size (4WD), together with a permit system is supported on condition that it is reviewed from time to time with a view to considering increased access should it be appropriate.	Noted.	2(a)
131	We agree with the retention of the existing 4WD track across the Range, and the access issues raised.	Noted.	2(a)
132	We support the introduction of a permit system to the top of the Range.	Noted.	2(a)
133	To impose a minimum two vehicle limit on people is too restrictive for many single vehicle travellers. The Plan acknowledges no rescues have ever come to the Department's attention. Further, the permit system provides for an effective registration process which presumably would be accompanied by instructions as to min. safety requirements (sufficient food, water, desirability of carrying an EPIRB, recovery gear, etc.).	As there are more remote places in W.A. being accessed by single vehicles, many of which are experienced 4WD users and carrying the right equipment for remote journeys, we agree that single vehicle traversing the Range will be allowed.	1(c)
134	The Kennedys are only relatively remote, and certainly not as remote as desert tracks, Rudall River NP or places south of Halls Creek or north of the Nullarbor.	Noted.	2(b)

Comment No.	Summary of comment	Discussion/Action Taken	Criteria
135	There is no indication as to whether fee will be combined or separate for 1. entry 2. camping 3. permit to drive across top of range.	The possible introduction of a permit system to cross the top of the Range is discussed. This discussion includes whether a fee should be attached to any permit system and if so, whether a combined permit/camping fees has merit.	2(d)
136	Permits to access this pristine area are a good idea. The Department already has an extensive form to be filled in for noncommercial activity on Departmental estate. I do not however support and strongly object to fees being levied on an isolated spot. It is problematic to police and encourages people to 'get their monies worth' - an example is campers removing all the toilet paper from the toilets to get value for the \$\$ spent. If any fee is levied then direct supportive structure should be in place. A good start would be rangers conducting tours and interpretive activities in the area.	Visitor fees, which include entry and camping fees, are charged at a range of parks an DEC-managed areas around the state. Generally, fees will be considered from visitors, within the bounds of cost-efficiency, where there is a reasonable level of service or facility provided. Fees are currently not collected at the Kennedy Range but proposed development planned for the Park, in combination with increased visitation and management pressures, may trigger the introduction of fees.	2(f)
137	I think that while 4x4 usage has its advantages, bushwalking is a low impact activity that should be promoted by establishment of a walking route and minimal impact across this unmodified environment.	Noted.	2(a)
138	I agree with keeping top of range open and the permit system. I do not agree with area charges being placed on this trip.	Noted.	2(e)
139	<p><b>PART F: MANAGING SUSTAINABLE RESOURCE USE</b></p> <p>I am supportive of proposals in this section.</p>	Noted.	2(a)

Comment No.	Summary of comment	Discussion/Action Taken	Criteria
140	<p><b>Mining and Collecting</b></p> <p>I object to the Plan. I own granted mining lease 09/18 and pending mining lease 09/92. It would be unfair to us and other lease holders to be restricted in ongoing access to our leases and our right to mine in National Parks, due to the government's strong policy to inhibit mining in National Parks. I was assured by a Departmental officer that I would not be disadvantaged or restricted by this proposal. We have not been advised of any changes or reasons regarding converting of land to National Park. I feel the mookaite deposit should be excluded from the Park. As I was not made aware of this proposal I would like the opportunity to provide a further submission.</p>	<p>Granted mining leases on the former Mooka pastoral lease will be excluded from the proposed additions to the national park and established as separate CALM Act section 5(1)(h) reserves to allow for this activity to continue. In relation to pending leases, the provision of mineral and petroleum exploration and development is stated in the plan in accordance with Government policy. The Department understood that the proposal to add the ex pastoral station of Mooka to the existing Park was known by mining stakeholders. The Department also considered that the Department of Industry and Resources (DoIR) represented the interests of holders of prospecting licences, exploration licences and mining leases over the management planning area. However, this management plan's process has been amended to include these interested parties as stakeholders by including them in the distribution stakeholder database for this plan.</p>	2(f)
141	<p>We are opposed to the proposed additions to the national park, particularly to the west, because of the presence of mineral and petroleum titles and significant mineral and petroleum potential. Inclusion of these areas in a NP will raise problems for existing mineral/petroleum title holders and prevent access after existing titles expire.</p>	<p>Provision for mineral and petroleum exploration is stated in the Plan in accordance with Government policy.</p>	2(d)
142	<p>Mooka Creek is the only known source of mookaite and peanut wood on Earth. If the area is closed through incorporation into a NP, Western Australia will lose two of its unique gemstones, be criticized internationally as a poor land manager and will jeopardize its reputation as a reliable supplier of unique gemstones.</p>	<p>Provision for mineral and petroleum exploration is stated in the Plan in accordance with Government policy.</p>	2(d)
143	<p>There is little reference to actual prospectivity in the Plan. The area has significant petroleum potential. This is part of the Carnarvon Basin, Australia's premier source of petroleum. The potential for further discoveries, to support the communities dependence on petroleum, should be acknowledged. Exploration in this area is likely to be required for many years through many phases of titles and exploration activity.</p>	<p>The Park is located within the Southern Carnarvon Basin, an area that has petroleum potential, but is not significant; the Northern Carnarvon Basin (as opposed to the Southern Carnarvon Basin) is significant for petroleum potential. Geological Survey of WA, Report 61.</p>	1(b)

Comment No.	Summary of comment	Discussion/Action Taken	Criteria
144	There is potential for a range of minerals or commodities, and the same exploration requirement (as per point above) exists.	It is understood that the western side of the Range may contain a major heavy mineral deposit(s).	1(e)
145	Collecting semiprecious gemstones either by mining on mining leases or fossicking authorised by virtue of a Miners Right are legitimate activities and should be allowed to continue.	Noted and plan amended - refer to comment 151 below.	
146	I fear that if the area (within Mooka Pastoral Lease) is converted to a national park it may adversely affect or even prevent mining activities along Mooka Creek. Another problem may be the issue of access to the mining lease through the proposed national park.	Granted mining leases on the former Mooka pastoral lease will be excluded from the proposed additions to the national park and established as separate CALM Act section 5(1)(h) reserves to allow for this activity to continue. The provision of mineral exploration is stated in the Plan in accordance with Government Policy.	1(b)
147	Mookaite is an extremely popular semiprecious gemstone worldwide (an internet search for mookaite has produced 47,000 references). Therefore for the Department to recommend the area be included in the national park, under the Government's policy of preventing future access to explore and mine would be to deny the world access to this important source of rock and joy.	As the planning area is the only place in the world where mookaite and peanut wood is found, their protection from overcollecting and mining, as part of Australia's geological heritage, is appropriate. Provision of mineral exploration is stated in the Plan in accordance with Government Policy.	2(e)
148	I require assurance that my future access to mine on the existing lease and explore on possible future exploration or prospecting titles be assured, and not prevented by land tenure changes.	The provision of mineral exploration is stated in the Plan in accordance with Government Policy.	2(f)
149	For close to 50 years, amateur fossicking as well as commercial mining has taken place here.	Noted.	2(b)
150	The Plan refer to the need to rehabilitate the visual effects of mining. When Mooka Creeks flows strongly, that flow naturally rehabilitates the operations and returns the area of a natural-looking watercourse. Because of the nature and scope of these small-scale operations, it is untenable to consider that major visual impacts will result from the mining.	Noted.	2(e)

Comment No.	Summary of comment	Discussion/Action Taken	Criteria
151	Regarding the recreation and education values, it is a location that at least two lapidary clubs from Perth (Rockingham and Kalamunda) regularly visit to collect mookaite.	In relation to amateur rock collecting, as the intention is to incorporate the proposed additions into the existing national park reserve, it will not be possible for amateur rock collecting to continue. However, over the life of the plan, consideration of the CALM Act reserve that allows for fossicking by hobbyists and tourists will be explored with DoIR.	1(b)
152	I cannot see where the large quantities of semi-precious gemstones and fossils have been removed. We are not commercial.	Noted and plan amended. Also refer to comment 151 above.	1(b)
153	These proposed additions take in three of our traditional fossil material collecting areas where collections have been made on irregular basis for fifty years. If and when the status of the proposed additions is settled, what will be the plans and policy regarding allowing traditional rockhunting and collecting in these areas.	Refer to comment 151 above.	1(b)
154	Almost all visitors who pass by my mining lease on the way to the ranges, stop and express great interest in my activities, invariably asking questions and seeking permission to take or buy a few samples of the colourful mookaite.	Noted. Refer to comment 165. The purchase of mookaite is beyond the scope of this plan.	1(b)
155	Visitors to the town of Carnarvon regularly make enquiries at the local tourist bureau as well as at the Department's office in Carnarvon regarding information on buying or collecting mookaite.	Noted. The purchase of mookaite is beyond the scope of this plan.	1(b)
156	We (Herald Resources) are the holder of two exploration licences granted on the 27th August 2004 - the licences were applied for on 24 January 2000. The licences cover land which includes the Kennedy Range NP, the Doorawarrah and Jimba Jimba pastoral leases and the previous Mooka Pastoral lease (now UCL) and in particular a significant portion of Area 7 as shown on Map 1 of the Plan.	Herald Resources tenements were surrendered on the 22/8/2006. DoIR pers. comm. 29 November 2006	2(c)

Comment No.	Summary of comment	Discussion/Action Taken	Criteria
157	<p>The Plan states that the mineral potential of the planning area is low. However, we (HR) believe that the western areas of the proposed additions may contain a major heavy mineral deposit(s). As referred to in the Plan the western side of the Kennedy Range was an old coastline. We believe this section of the coastline formed a "J" shaped bay which has the potential to contain the mineral sands. If we are correct then the mineral sand potential is significant and this would have major economic implications for the State of WA.</p>	Noted and text amended.	1(b)
158	<p>We must have the opportunity to test and evaluate the mineral sands potential of the Mooka area. If this area is incorporated into the NP (A Class) before adequate evaluation of the mineral sands potential Government Policy will prohibit access and deny possible major economic benefits to the people and State of WA. Therefore, we respectfully object to the addition of the Mooka PL into the NP until full evaluation of the mineral sand potential has been completed, and, in such evaluation shows commercial mining of the mineral sands in economic then until completion of such mining operations.</p>	The provision of mineral exploration is stated in the Plan in accordance with Government Policy.	2(f)
159	<p><b>Beekeeping</b> We support a continued ban on beekeeping.</p>	Noted	2(a)
160	<p><b>Public Utilities and Services</b> There is little detail stipulating whether or not utilities will be allowed in the Park. At times, agencies such as Water Corporation, Western Power and Telstra seek to use portions of Departmental managed lands. From time to time viable options are not available off the conservation estate, and these important services to the community need our consideration.</p>	Noted and plan amended.	1(a)
161	<p><b>PART G: INVOLVING THE COMMUNITY</b> DSR maintains a regional office in Carnarvon and wished to support the Department's initiatives in the Park. It is requested that a collaborative approach be adopted in the development of recreation products.</p>	Noted and plan amended.	1(a)

Comment No.	Summary of comment	Discussion/Action Taken	Criteria
162	<p><b>Information, Education and Interpretation</b></p> <p>There is no mention of the geology. It is ironic that the prime reason the Kennedy Range would have been selected as a national park was because of the scenic and hence geological attributes, but they are now not included as being important for the future edification of visitor to the Park.</p>	<p>Noted. Geological interpretation is discussed under the section Geology, Geomorphology and Land Systems. The Information, Education and Interpretation section does identify that education and interpretation programs will concentrate on raising awareness of the natural values of the planning area and geology is considered as part of the natural values.</p>	2(d)
163	<p>The road over the Range, that is one of the attractions for visitors, was actually made by WAPET in 1964 to facilitate the drilling of the Kennedy Range 1 Oil Well, and the road passes that site. Many visitors would be interested in seeing the site of an oil well, and that should be included in the interpretive material.</p>	<p>Interpretation will consider all aspects of the area's history.</p>	2(d)
164	<p><b>Working with the Community</b></p> <p>Currently in the proposed additions there are a number of key community members who are not identified; namely mineral and petroleum explorers, miners, fossickers and gemstone collectors. These are mining titleholders who have rights granted by the State Government. However, there appears to be no attempt to contact or advise these people that the draft plan was available for comment.</p>	<p>The Department considers the Department of Industry and Resources represents the interest of mining and petroleum stakeholders in Western Australia. However, for this plan, the Departmental database will be updated and these stakeholders will be formally notified.</p>	1(b)
165	<p>There has been no communication with the State Lapidary Association of WA or any Affiliated Clubs. Lapidary clubs have probably walked over this area more than anyone and have not caused any harm to flora and fauna, only collected surface or subsurface material, never torn up the soil, only used existing vehicle tracks and left the area as we found it, and in some cases, better. This plan, if approved, will alienate the community of Lapidary, rock hunters and the like.</p>	<p>Noted and plan amended. Refer to comment 151 above. Letters from the Minister for the Environment have also been sent in response to concerns raised by two lapidary organisations. Letters between the Minister for State Development and the Minister for the Environment have also been considered in relation to prospecting.</p>	1(b)
166	<p>Involving the community is fine as long as it doesn't mean closing of tracks or campsites.</p>	<p>Noted.</p>	1(e)
167	<p>Add another point: Involve the community in the on-going management of the Park.</p>	<p>Noted and plan amended.</p>	



Comment No.	Summary of comment	Discussion/Action Taken	Criteria
168	<p><b>PART H: IMPLEMENTING THE PLAN</b>  <b>Research and Monitoring</b>  A systematic fauna survey is indicated as needed and this is strongly supported as it is essential to fine-tuning any management plan, providing information for public education as well as underpinning biodiversity values of the Park.</p>	Noted.	2(a)
169	Research should consider examining and monitoring the impacts of goats on biotic community structure and their recovery after goat eradication.	Noted and will be a component of the Goat Management Strategy.	2(d)
170	We support all proposed projects.	Noted.	2(a)
171	Considering Plan is based on 10 years is every 5 years to report on surveys sufficient. Also review times should be consistent (fire - 5 years, cross top (2 years), visitors (5 years) feral goats (3 years).	The auditing of key performance indicators is developed on a case by case basis dependent on the strategy to be measured. Each strategy may have different monitoring requirements and therefore different timeframes for auditing. Auditing undertaken by CCWA is a formal process conducted during and at the end of the life of the plan.	2(d)
172	<p><b>References</b>  There is no mention of the source for the geological comments. Obtain and refer to the Geological Survey of WA Record 92/4. The geology and mineral resources of the proposed Kennedy Range National Park, by KM Ferguson et al. The book was written with one important goal being to assist the Department in its future consideration of the area.</p>	Noted and plan amended .	1 (a)
173	Useful additional geological references include: Hocking RM et al. (1985), Kennedy Range W.A: Western Australia Geological Survey 1:250 000 Geological Series Explanatory Notes; and; Geological Survey of WA 1990, Geology and Mineral Resources of WA, WA Geological Survey.	Noted and Hocking et al. reference included.	1 (a)

Comment No.	Summary of comment	Discussion/Action Taken	Criteria
174	<p><b>COMMENTS ON THE SUMMARY TABLE</b></p> <p><b>Proposed and Existing Tenure</b></p> <p>In relation to the statement that the additional land was purchased to add to the NP - this should be qualified by the requirement to conform to due processes in land change assessments and considerations within the Government of WA.</p>	<p>The purchases were made as part of the implementation of the Gascoyne-Murchison Strategy, and consistent with State and Commonwealth Government commitments to establish a comprehensive, adequate and representative system of conservation estate.</p>	2 (d)
175	<p>We object to your target of changes in land tenure within two years of commencement of plan. By making this an A class reserve, which I assume will mean parking areas (all pegged out with treated pine posts and rails) with cleared picnic areas, walkways, etc., and improved access will only increase human damage to an almost pristine area.</p>	<p>The proposal to add the additions to the existing national park does not mean that these type of visitor facilities are put in place. Planning for recreation in the planning area is founded on the premise that the remote, natural characteristics of the Range are its greatest assets. As the Kennedy Range is recognised as an 'icon' park for the Gascoyne Region, the plan aims to consider immediate and longer term impacts of increasing visitors to the Park.</p>	2(e)
176	<p><b>Geology, Geomorphology and Land Systems</b></p> <p>Under Geology... there is a statement "to maintain the geological and geomorphological diversity" and "to protect the .....fossils". The use of the term "diversity" to describe the variation in the geological attributes is questionable because it gives no indication of the nature or value of those attributes or especially of their variability. In reality, and significant variations (the "diversity") in the geology across the area are not going to be affected by humans in such a way to reduce the diversity of rock types or the landscapes or other geological attributes. No potentially vulnerable sites or areas have realistically or reasonably been documented in this report, and none have been identified. They should be mentioned as a key indicator.</p>	<p>The nature, variation and values (subjective or otherwise) are discussed within the plan. The diversity of rocks are unlikely to be affected by humans, excluding possible decrease of diversity by overcollecting of mookaite and peanut wood.</p>	2 (d)
177	<p>Fossil and gemstone fossicking and collecting is a legitimate activity and should be allowed to continue. There is a reference to feral goats causing problems for the geology, but this would seem to be highly unlikely.</p>	<p>Goats are unlikely to affect geological features and fossils but are likely to degrade smaller-scale features such as river banks, dune fields and vegetation, leading to erosion that changes existing geomorphological features in the area.</p>	1 (e)

Comment No.	Summary of comment	Discussion/Action Taken	Criteria
178	<p><b>Climate, Soil and Catchment Protection</b></p> <p>Prohibiting camping at Mooka Creek. Fossicking and mineral collecting is a legitimate activity on Crown land and requires the ability to camp near the site. There are granted mining leases along the Creek, and camping is an authorised activity.</p>	<p>Noted. The camping referred to was in relation to visitors camping on Mooka Creek. Camping is an authorised activity for granted mining leases.</p>	1(e)
179	<p><b>Recreational Opportunities</b></p> <p>One dot point refers to "geology being susceptible to visitor impacts" - this needs clarification because the geology would not seem to be vulnerable to visitor's impact, except if usage rises to high levels at small sites. The report refers to the Range covering 80 x 20 km, and that is a very large area for the whole to be affected.</p>	<p>The geology is unlikely to be vulnerable to visitor impacts. Geomorphological features could be impacted upon if not managed well.</p>	1(e)
180	<p><b>Managing Resource Use</b></p> <p>There is a statement that the area has low mineral potential, and Objective 1 refers to protecting the area from the impact of mining and exploration and to opposing any additional mineral resource development activity. (3) In response to this:</p>		
181	<p>1. The area has significant petroleum potential, which is why a petroleum exploration licence extends over part of the area.</p>	<p>Noted and plan amended.</p>	1(b)
182	<p>2. There is significant mineral potential, which is why there is an exploration licence over the area. In fact, the style of mineralisation being sought is the application of a new scientific model; application of new concepts in the future could also make the area prospective for new styles of mineralization.</p>	<p>Noted and plan amended.</p>	1(b)
183	<p>3. There are producing mines in the area that produce a unique semiprecious gemstone that is in demand around the world. Internet Search engines in Sept./Oct. 2005 have generated between 27000 and 63000 reference to mookaite. This is a very important semiprecious gemstone, and future access to mine it should be supported as an essential, valuable community activity.</p>	<p>As mookaite is found only in the white hills and several drainage lines of the west side of the range, these areas are potentially important and significant geological heritage sites, thereby strengthening the natural value of this semiprecious gemstone.</p>	2(d)

Comment No.	Summary of comment	Discussion/Action Taken	Criteria
184	WA's economic well being is underpinned by the mineral and petroleum resource sectors; without the wealth from these activities, there would be much less development and wealth to allow people to visit the area.	Noted.	2(h)
185	Mining has been undertaken in the proposed extension for many years. Despite this, mining is not creating significant impacts as the area still contains values that warrant inclusion in the NP. The mining has occurred along a creekbed, and anecdotal statements suggest that each time Mooka Creek flows, the evidence of mining is rehabilitated by natural processes.	Noted.	1(e)
186	<p><b>OTHER COMMENTS</b></p> <p>The Department has been known to change and/or add to their management plans without even indicating such changes were even thought of. I hope this doesn't happen with this Plan.</p>	Noted.	2(b)
187	I would like to see the Kennedy Range available to all, campers, hikers, hunters (like me) with minimal restrictions. Let's cooperate.	Noted.	2(b)

## **APPENDIX 1: SUBMITTERS TO THE PLAN**

### **Individuals**

- 5. J. Bass and C. Allbeury
- 22. M. Baston
- 23. N. Baston
- 11. A. Butler
- 17. D. James
- 14. R. Moon
- 15. W. Whitnell

### **Community Organisations**

- 6. Conservation Council of Western Australia
- 24. Conservation Volunteers Australia
- 27. Kalamunda Lapidary Club
- 12. Mundatharrda Aboriginal Corporation
- 20. The West Australian Field and Game Association
- 26. Western Australian Lapidary and Rock Hunting Club
- 9. Western Australia 4WD Association
- 4. Wildflower Society of Western Australia

### **Companies**

- 18. Australian Outback Mining
- 19. Herald Resources

### **State and Australian Government**

- 8. Department of Conservation and Land Management – Planning Unit
- 16. Department of Conservation and Land Management – Leasing Unit
- 25. Department of Conservation and Land Management – Species & Communities Unit
- 21. Department of Environment
- 7. Department of Indigenous Affairs
- 3. Department of Industry and Resources
- 1. Department of Sport and Recreation
- 2. Western Australian Museum

### **Other Organisations**

- 13. Central TAFE (Mt Lawley)