

SHANNON AND D'ENTRECASTEAUX NATIONAL PARKS

Analysis of Public Submissions
to the Draft Management Plan

2008

Department of Environment and Conservation
for the
Conservation Commission of Western Australia

CONTENTS

BACKGROUND	1
Method of Analysis	1
Analysis Process	2
ANALYSIS TABLES	3
GENERAL	3
PREFACE	12
PART A: INTRODUCTION	12
2. Regional Context	12
3. Management Plan Area	12
4. Key Values	18
PART B: MANAGEMENT DIRECTIONS AND PURPOSE	18
6. Vision	18
7. Legislative Framework	19
8. Management Arrangements with Aboriginal People	20
9. Management Planning Process	21
10. Performance Assessment	21
PART C: MANAGING THE NATURAL ENVIRONMENT	21
11. Biogeography	22
12. Climate Change	22
13. Geology, Landform and Soils	23
14. Landscape Quality	25
15. Soil and Catchment Protection	25
16. Native Plants and Plant Communities	28
17. Native Animals and Habitats	29
18. Species and Communities of Conservation Significance	30
19. Environmental Weeds	34
20. Introduced and Other Problem Animals	38
21. Diseases	43
22. Fire	45
PART D: MANAGING OUR CULTURAL HERITAGE	68
23. Indigenous Heritage	69
24. Non-Indigenous Heritage	70
PART E: MANAGING RECREATION AND TOURISM	73
25. Recreational Opportunities	76
26. Visitor Access	84
27. Recreational Use	98
28. Commercial Tourism Operations	138
29. Visitor Safety	139
30. Domestic Animals	139
PART F: MANAGING SUSTAINABLE RESOURCE USE	143
31. Traditional Hunting and Gathering	143
32. Mining	143
33. Commercial Fishing	147
34. Defence Force Training	147
35. Scientific and Research Use	148
36. Public and Private Utilities and Services	148
37. Rehabilitation	149

38. Beekeeping	150
39. Forest Produce	155
40. Water Resources	156
PART G: INVOLVING THE COMMUNITY	158
41. Information, Education and Interpretation	158
42. Working with the Community	159
PART H: MONITORING AND IMPLEMENTING THE PLAN	159
43. Administration	159
44. Research and Monitoring	160
APPENDIX 1 SUBMITTERS TO THE DRAFT PLAN	161

BACKGROUND

This document is an analysis of public submissions to the Shannon and D'Entrecasteaux National Parks Draft Management Plan 2005.

The plan was released for public comment on 21 May 2005 for a period of 3 months. Late submissions were accepted. A total of 1073 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 Departmental offices in Kensington, Manjimup, Pemberton and Denmark, and could be inspected at the Departmental library at Woodvale, and the libraries and municipal office of the shires of Manjimup and Nannup.

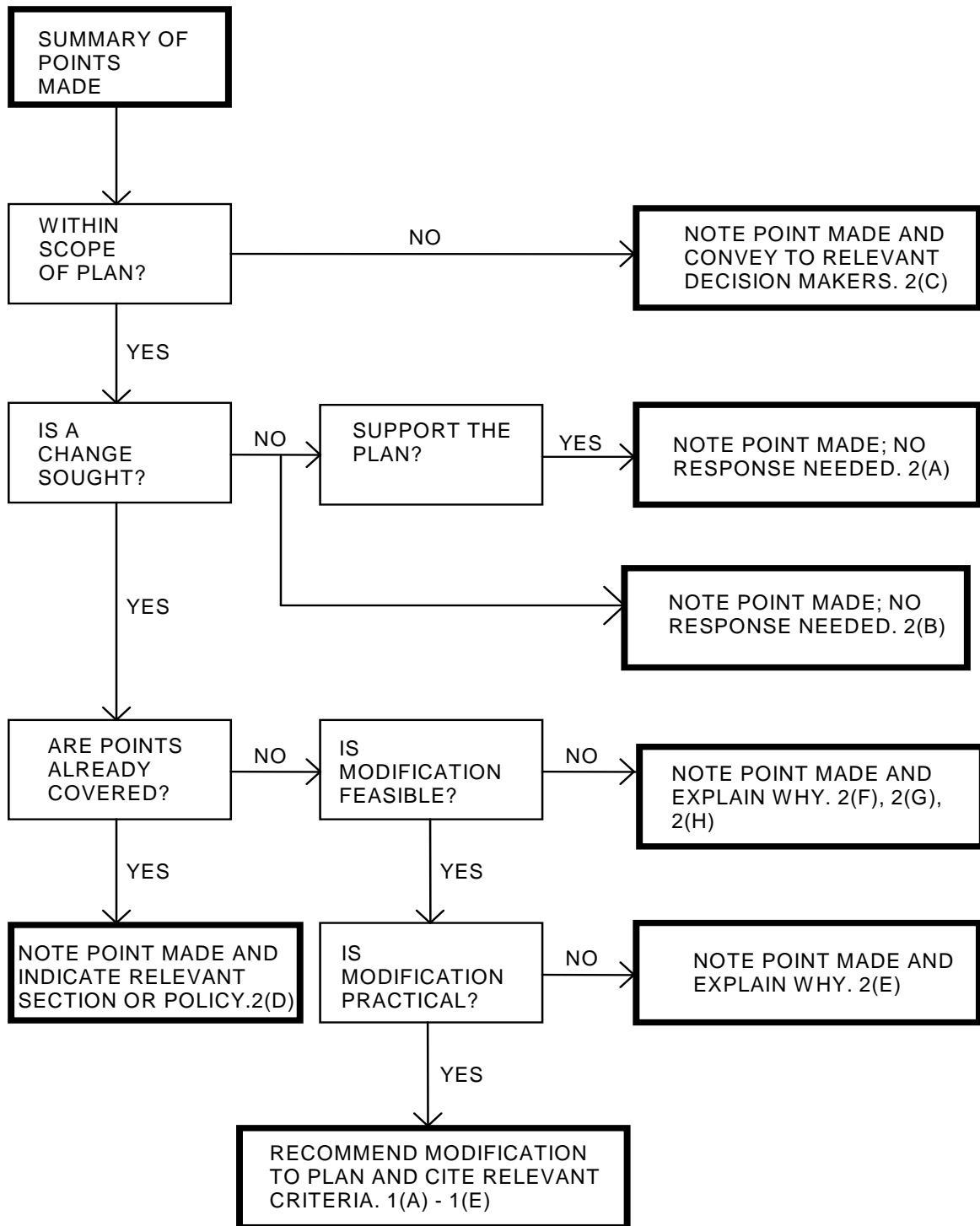
Method of Analysis

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

- ❖ The comments made in each submission were collated according to the section of the plan they addressed.
- ❖ Each comment made was assessed using the following criteria:
 1. The plan *was amended* if the comment:
 - (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 in the plan.
 2. The plan *was not amended* if the comment:
 - (a) clearly supported the draft proposals;
 - (b) was a neutral, general or immaterial statement, did not seek an amendment or was a question not requiring an amendment;
 - (c) addressed issues beyond the scope of the plan;
 - (d) was already made in the plan, or had been considered during plan preparation;
 - (e) was one amongst several widely divergent viewpoints received on the topic and the text/recommendation of the plan was still considered appropriate/the best option;
 - (f) contributed options which were not possible (generally due to some aspect of existing legislation, Government or Departmental policy);
 - (g) was based on incomplete, assumed, dated, unclear or incorrect information or has misunderstood the points raised in the plan; or
 - (h) involved details that are not necessary or appropriate for inclusion in the plan, particularly in a document aimed at providing management direction over the long term.
- ❖ The reasons why recommendations in the plan were or were not changed, and the relevant criteria used, were discussed with each comment. Minor editorial changes referred to in the submissions have also been made.

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

Analysis Process



ANALYSIS TABLES:

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
	General			
1	General	Many of the proposed initiatives will lead to the protection of the special values of the area	Noted	2(a)
1	General	The committee fully supports the need for a detailed plan to protect the unique natural and heritage features of the park	Noted	2(a), 2(b)
1	General	The authors are to be commended for the Shannon D'Entrecasteaux National Parks Draft Management Plan 2005. The plan incorporates iconic coastal and forested regions of the State, valued by West Australian and national / international visitors for their scenic beauty and quality as wilderness. The importance of the plan for the management area is acknowledged, as are the increasing pressures placed on the Park from exponential visitor rates. The Shire of Augusta Margaret River supports the general strategies and recommendations of the Management Plan	Noted	2(a), 2(b)
1	General	I am on the whole delighted with the draft Shannon and D'Entrecasteaux Parks Draft Management Plan. There are, in my opinion, some issues which require clarification or amendment. Generally, the DMP outlines a responsible and informed approach to other problematic issues of management	Noted	2(a), 2(b)
1	General	This is an impressive attempt by responsible managers of the natural environment	Noted	2(a)
1	General	We believe the plan is a step in the right direction and contains many good points. However, we do believe there are areas where it could also be improved upon	Noted	2(a), 2(b)
1	General	Based on firsthand knowledge of the site and recollection of the results of surveys conducted there, Wetlands International - Oceania generally concurs with the statements and proposals concerning wetlands and their biodiversity in this plan	Noted	2(a)
1	General	The plan is a very comprehensive document supported by a large body of research data	Noted	2(a)
1	General	I found the Draft Management Plan comprehensive and interesting and generally presenting reasonable and achievable goals	Noted	2(a)
1	General	As well as a draft management plan this document is also an important reference work. It contains many valuable pieces of information as well as a comprehensive reference list (all 212 of them). This document therefore also deserves an ISBN number. I understand this only costs an extra \$10 or so in total for the production run of the draft plan (not for each plan). This figure can be checked with CALM's Strategic Development and Corporate Affairs Division	ISBN numbers are only sought for saleable publications. Management plans are issued free of charge, therefore the Department does not seek ISBN numbers for them	2(d)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	General	We think you have, with a few exceptions, done a fine job with your management plan. You will note that we are more concerned with how this plan will actually be administered. If your management and administration can incorporate our concerns we believe it will considerably enhance the Premier's objectives and enhance bushwalking opportunities and preserve the National Parks	Noted	2(a), 2(b)
1	General	The plan needs a common sense approach and not be bent by the greens and environmentalists	The management plan is driven by legislation, Departmental policy and conservation objections	2(e)
1	General	This draft contains a thorough and comprehensive treatment of the key issues on which the objectives and ways of achieving the objectives were based. Rather than repeat this comprehensive approach the final plan would be a very readable document of most of the basis is left out and only the key points, objectives and ways of achieving the objectives are retained, modified where appropriate by comments received on the draft plan. An explanatory wording of this approach could be placed in the introduction of the final plan along the following lines. "For ease of reference this final management plan has been shortened compared with the draft plan. The key points, objectives and ways of achieving the objectives are retained, modified where appropriate by comments received on the draft plan. The changes to the draft plan are documented in the published summary of public submissions while the basis for the key points, objectives and ways of achieving the objectives are available in the published draft plan"	The Department is considering options which includes the one you have put forward. However, this would apply to future plans and not this one	2(c), 2(d), 2(f)
1	General	The plan is lengthy, wordy, complex in layout, difficult to read and airy-fairy Management plans should not look or read like a PhD thesis as this draft plan does Management plans are not meant to be a document which attempt the full panoply of historical and environmental education or which discuss and debate ecological theory They are meant to be a simple blueprint for action by CALM managers in the bush The ideological debates can be held in another forum or disposed of in scientific journals The management plan should be short, sharp, and to the point What is to be done? What are the priorities? Who will do it and to what standard? How is the work to be funded? Who ensures it gets done? The rest is all academic waffle and distracts the reader from knowing what the hell is proposed	Not all people have same level of knowledge. The plan needs to provide sufficient information to justify strategies. The draft plan is for both the public and also for the managers	2(c), 2(d), 2(f)
1	General	The draft plan of 214 pages is far too verbose a document containing much information that is applicable to national parks in general. A more functional document would cover all the essential objectives and action to be taken leaving most of the general information and rationales to be published in a separate broad coverage document for national parks in general. This would avoid costly duplication in the management plans for other parks and reserves. The present format is too longwinded and cumbersome for the reader to easily comprehend the proposals for management of the specific park	As above	2(c), 2(d), 2(f)
1	General	Too much information, poorly written	As above	2(c), 2(d), 2(f)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	General	I wanted to congratulate whoever pulled the draft management plan together Compared to a lot of other CALM documents. I have had the pleasure (ahem!) of trying to read and decipher in the past, this one was relatively easy to read and follow. It really does make a huge difference, so thank you	Noted	2(a)
1	General	I must commend the plan coordinator on a very thorough job in dealing with the issues connected with managing these two parks. The breadth of the approach is very comprehensive. Well done	Noted	2(a)
1	General	The plan is un-necessarily lengthy. It attempts to fulfil the role of a reference document as well as provide guidance on management. In doing so the guidance on management is diluted and fragmented across the document. This makes the use of the document as a management tool difficult and open to ambiguity and interpretation. If both these outcomes need to be addressed then I suggest two documents be produced, one a management plan and the other a supporting reference text	Draft management plans are prepared to provide a comprehensive coverage of management issues and for a wide audience. The Department is considering options which includes the one you have put forward. However, this would apply to future plans and not this one	2(c), 2(d), 2(f)
1	General	Each box with key points, objectives and 'achieved by' components is excellent	Noted	2(a)
1	General	Could you please add to each "Key Points" the name of the issue to which it refers. At the moment you have to turn the page back to be sure what the issue is. Thus on page 94 "Key Points" would become "Key Points for Boating", on page 97 "Key Points" would become "Key Points for Surfing and Swimming"	Noted	1(c)
1	General	The maps, tables and appendices are very good. Having colour maps helps a great deal when there is so much information in the maps	Noted	2(a), 2(b)
1	General	The draft is a useful reference work on the theories on which park management can theoretically be based but it fails as a specific working management guide for the two National Parks	The plan attempts to be as specific as possible without being too prescriptive	2(d), 2(f)
1	General	Unimpressed with this draft management plan. It is too long, too academic, does not have an operational focus, fails to put any pressure on CALM to lift its game and does not fulfil the community's most basic expectation i.e. that a management plan should set out a blueprint for protection of the parks from the single most damaging agency, large high intensity bushfires	As above	2(d), 2(f)
1	General	The draft plan is a complex document and difficult to read. It is expansive on the theory of sustaining biodiversity but short on operational forest and parkland management proposals	As above	2(d)
1	General	Who decides the main issues as I feel most of this report is so minor that its issues are more about justifying somebody's existence than solving any problems. Far too extensive about minor issues e.g. sandboarding on P97, again this is more about justifying reporting/researching personnel employment	All issues are addressed and are important to their respective stakeholders. Management planning is also about managing potential conflicts between disparate stakeholders and user groups and the natural environment	2(e)
1	General	From Part A to H has been clearly put together by people justifying their jobs, e.g. If I worked for CALM and was asked to go out and list as many subjects as possible pertaining to the area in question, then this report would be overdoing my job, at tax payers expense	As above	2(e)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	General	This draft plan presents some information as if it is documented, established fact, when in fact much of it is either 'conservation dogma' that appears ingrained within conservation agencies or information that has been misinterpreted or manipulated to present a pre-existing view. For a government agency responsible for the stewardship of the majority of public lands within this state, this is unacceptable	The management planning process is based upon sound scientific research programs conducted by the Department, other independent researchers and best-practice management techniques	2(e)
1	General	Refer to Shannon Park and D'Entrecasteaux National Park Draft Management plan of 1986 for clear, concise, knowledgeable, short, succinct matter	As above, the 1987 plan was 180 pages	2(f)
1	General	The final plan should be cut in length by about 70%. It should comprise six simple sections: 1 A description of the area being managed 2 The objectives of management 3 The main issues 4 Actions, priorities, responsibilities and funding arrangements and 4 the mechanisms to be employed to ensure independent monitoring and public reporting of actual outcomes as opposed to prescribed actions. This should take 20 pages not 213	The planning area has a wide range of issues and activities which could not be dealt with in 20 pages	2(d)
1	General	In our view this plan needs a total redesign, a different approach and new writers. This draft is rejected	As above	2(e)
1	General	Far too many issues are overstated. Duplication and contradiction are rife	Some issues of a multidisciplinary nature find expression in various parts of the document	2(d), 2(e), 2(g)
1	General	It could be made easier to understand if you used proper language, and hired a proof writer	Noted	2(f)
1	General	Having the maps A4 size is also very convenient	Noted	2(a)
1	General	Maps are too general	Maps are suitable for the role of a management plan	2(d)
1	General	Provide a map of D'Entrecasteaux National Park as soon as possible, including a detailed map of the cliff-top walk at Windy Harbour	Please contact the District Office for suitable maps	2(c)
1	General	The plan is in accordance with Tourism WA's "Keeping it Real - A Nature Based Tourism Strategy for Western Australia" which encourages the sustainable development of tourism in natural areas and recommends the management of natural settings as the principal requirement for quality visitor experiences	Noted	2(a), 2(b)
1	General	Make it easier to understand	Noted	2(b)
1	General	The Draft Management Plan is in accordance with Tourism WA's Australia's South West Destination Development Strategy 'An Action Plan Approach' 2004-2014 (ASW-DDS) which identified nature based and eco tourism experiences as major tourism attractions. The plan is in line with the ASW-DDS's recommendation that tourism infrastructure and management plans are developed which allow these areas to be enjoyed while maintaining their pristine/natural charm	Noted	2(a), 2(b)
1	General	Tourism WA looks forward to working closely with CALM to ensure the successful implementation of the management plan	Noted	2(a), 2(b)
1	General	This plan is basically negative, giving inordinate attention to the curtailment of human and domestic animal intrusion	The plan provides a balance between recreational needs / desires of the community and the long term protection of the conservation values in the parks	2(e)
1	General	The Council acknowledges the tremendous effort of CALM in developing the Draft Management Plan. It will no doubt provide a sound framework for future management. It is suggested that the matters put forward in this submission, if adopted by CALM, will assist the Draft Management Plan to better take account of local community issues and to assist in effective implementation	Noted	2(a), 2(b)
1	General	An ordinary taxpayer does not have the time to play departmental games	The Department is fulfilling its statutory requirements to prepare a management plan for the national parks	2(g)
1	General	It is hoped that local input (with extensive local knowledge and experience) is favourably considered and impractical pie in the sky theoretical submissions from non	All submissions are thoroughly considered for each issue	2(e)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
		resident minorities who hardly, if ever use this area, are discarded		
1	General	Above all, any changes finally recommended must be workable and practical and accepted by the vast majority of southwest residents who use the Park frequently to succeed	Local community ownership of a management plan is one of the key goals of the planning process, however there are many other users of the parks	2(b)
1	General	The main points I would recommend for consideration have been contentious for a long time, and I do not expect a ready resolution I would, however, encourage CALM to consider these comments in the spirit of a community member concerned about the welfare of the environment and not in any way motivated by profit or political gain	Noted	2(b)
1	General	The effect of some part of the plan and the effect on not just the local population as the park has a wider catchment of users, even international visitors, was not fully surveyed and taken into account. Visitors to the park form a large part of the local economy and any deleterious effect or change can affect the livelihood of many people	The views and needs of visitors of all types are represented within the planning process by various agencies and stakeholder groups	2(d)
1	General	CALM is now responsible for the management of vast tracts of public land in this state. There appears to be a general trend towards an ever-increasing amount of this land to be declared national park. While national parks are extremely important to the community in preserving areas their management in many respects does not reflect the community's needs or expectations	The community has divergent needs and expectations from national parks and their management which the planning process endeavours to address. With regard to national parks, there needs to be enough areas reserved to conserve biodiversity; this is particularly important in the SW where there is a biodiversity hotspot, large areas cleared and many development pressures	2(c), 2(d)
1	General	In the south west region the vast majority of coastline has been vested in national parks. It is quite clear that CALM does not have the resources to adequately manage these national parks, and at the same time continues to institute management policies that disenfranchise large sections of the community. In particular, it is absolutely vital that access to coastal areas for desired recreational activity is reasonable accommodated. This especially applies to local communities that have historically used these areas for recreation	Recreational planning within parks is based upon sustainable use and minimal impact where possible balanced against community needs and opportunities elsewhere within a region	2(d)
1	General	The social fabric of the lower southwest community has always included access and recreation within the natural environment. The lower south west has been settled in excess of 130 years and clearly the early settlers and the subsequent population have not degraded the forest, heath lands and waterways during this period of settlement. The fact that the government and visitors now covet these areas of forests, waterways and coastlines surely reflects favourably on the local population for valuing and utilising the region sensibly and sensitively in the pursuit of a livelihood and their recreation	The rationalisation of access and opportunities for recreation will ensure sustainable recreation and access for the local community as well as for other visitors as well as protecting the natural and cultural values of the parks. It is noted that there has been a close connection between the local community and the parks since settlement, however there has also been degradation of the values by European settlement and past use of the area, for example introduction of weeds, disease, feral animals and erosion. Refer to the draft for more information on these impacts	2(e)
1	General	Of particular concern to many people familiar with the area is the minimum intervention strategy adopted by CALM for management of these areas The ecosystems within the parks are frequently described as having great biodiversity value and extremely sensitive to environmental impact by recreational users. The reality is much of the coastal ecosystems within the park have proved to be remarkably robust to human intervention over many generations of cattle grazing and recreational users. While there is no doubt that these ecosystems sustained damage during this time, the reality is that the landscape was more similar to pre-European settlement after 150 years of 'misuse' by the community, than it now is, after 15 years of national park management	The type of recreation in the parks 100 years ago is not comparable to the level of recreation now. Most of the parks have been managed by the Government for over 30 years	2(e)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	General	The conclusion I come to is that CALM has a "close off" management system	Formal management to protect conservation values can entail some restrictions and/or modification to activities and access if necessary for the sustainability of park values	2(b), 2(e), 2(g)
1	general	I think it is a whitewash made to look bad so it can all be locked up	As above	2(b), 2(e), 2(g)
1	General	I just think the government and CALM have too much control of where and what we go and do Australia was a free and easy going country. Not now, thanks to you	As above	2(b), 2(e), 2(g)
1	General	This draft management plan has been heavily weighted towards the environment without any consideration towards social or recreational activity	All values have been extensively considered, however the protection of conservation values are the primary value	2(b), 2(e), 2(g)
1	General	Is there sufficient material on social impact to local residents? No good writing an impact statement after the event	As above	2(e), 2(g)
1	General	I am deeply troubled by Government making political decisions (to gain votes in the city) which seriously impact on local communities	Noted	2(c), 2(e), 2(g)
1	General	Given the unquestionable increase in general community awareness of the importance of preserving our natural environment, it is imperative that we protect areas of relative wilderness for the enjoyment of all, both now and into the future, from the self-interested views of a few who want to do whatever they like, regardless of the possible long term consequences of this for the majority, or the environment itself	Noted	2(a)
1	General	We cannot just let nature go by us, and this piece of nature is just as important in my opinion as any that have come under review before or any that will be scrutinised later. If you have children or even care about what the world's children will have down the line, then keep this place and what little we have left intact. Because who knows, will we really be able to live without it?	Noted	2(a)
1	General	Please ensure this amazing area within a global diversity hotspot is protected, now and for the future, as it should be, from as many negative human impacts as possible	Noted	2(a), 2(b)
1	General	I am a regular visitor to Western Australia as my young son resides in Perth and we have travelled together to many of these stunning sites. This Government has an overall positive environmental track record. It would be a blight if we could not protect these magnificent areas	Noted	2(a), 2(b)
1	General	The development of a balanced management plan that ensures conservation values are upheld while access to recreational opportunities are maintained is essential if these areas are to be enjoyed by future generations of Western Australians	Noted. This is what the draft plan sets out to achieve	2(a), 2(d)
1	General	The D'Entrecasteaux NP area was particularly noted for its open woodlands and grassy heaths, reputedly created by frequent fire strategies used by Aborigines and subsequently adopted by pastoralists in the area. Savannah-type landscapes were widespread in pre-European times and are now particularly rare in southern Australia. This ecosystem is rapidly disappearing as a result of inadequate fire management. CALM and other conservation policy makers need to reconcile the imminent extinction of this ecosystem with the current management strategies that are primarily the cause of this decline. In this context of imminent loss of a unique ecosystem due to current conservation policies, the environmental impact of the majority of recreational activities is both less significant and more sustainable	Your comments regarding fire are acknowledged and generally covered in the key points in section 22 and actions 1, 2, 8 and 9 on page 71. The Department has commenced an adaptive management trial in the Coodamurup area looking at more frequent introduction of fire and the best way of creating a patchwork or coarse grain mosaic of different vegetation seral stages. With a particular emphasis on sustaining the woodlands within the parks. More information can be obtained from the Department's Senior Ranger at the Pemberton Office. The environmental impacts associated with increased visitor numbers and inappropriate visitor behaviour in coastal environments are evident in many locations in WA and are well documented	2(c), 2(d)
1	General	Think of the future, think of your legacy. In ten years what do you want to be known for, when the world finally wakes up and realises that we need to protect our natural environment. Our children's future is on the line	The mission of the Department as set out in the <i>Corporate Plan 2007-2009</i> is "working with the community, we will ensure that WA's environment is valued, protected and conserved, for its intrinsic value, and for the appreciation and benefit of present and future generations"	2(d)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	General	Come on guys, we are trying to get our children away from the TVs and computers, not keep them away from the environment. I don't feel we are looking at the Big Picture - our future is our children	Noted, the draft provides for a wide range of nature-based activities	2(b), 2(c)
1	General	There are a number of key areas which need improvement if the area is to retain its magnificent wilderness values into the future, and indeed be enhanced by 2015 as per the Plan's vision	Noted	2(b)
1	General	The plan highlights the fact that the govt has ratified the creation of a marine reserve in Broke Inlet and that marine reserves have been recommended for waters near Black Point and the Warren Beach. The extent to which such reserve may impact on recreational activities is unknown and will remain a source of concern until it is known. Restrictions that may be imposed in these areas inevitably influences our comments on activities in the remainder of the park. We believe that any potential changes to permitted activities should have been foreshadowed in this draft so that informed comment could be made	Broke Inlet is outside the plan area. The draft plan refers to a report prepared by the Marine Parks and Reserves Selection Group in 1994	2(c)
1	General	I have been "coasting" since I was 14, I am now 47. During this time I have noticed changes to the area. We were always taught to respect the whole area and with the motto - what you take to the coast you take home from the coast. Now with the introductions of management plans and do-gooders there seems to be more rubbish left lying around than ever. As far as I can determine the coastline has managed itself for millions of years without interference and done a job far superior than any human could	Unfortunately the area can not manage itself with over 120,000 visitors a year. There has to be some management prescriptions put in place to preserve the values and experiences of the parks for people now and into the future	2(e), 2(f), 2(g)
1	General	You are too late. Human habitation, yards, buildings and freehold land abound. Those of us who go there now already enjoy the scenery etc as we go to fish and camp etc. These areas are our backyard and beaches. Leave us alone to enjoy them	As above	2(e), 2(f)
1	General	This is Australia. Leave our forests and land be taken care by nature. Not to be changed into something its not. This area is not pristine or untouched	As above	2(e)
1	General	We are concerned in general with the philosophical direction of national park management, the level of resources available for national park management and the long term effect this has on recreational users in the parks and in particular, park users that could be considered as 'local', 'long term' and 'frequent users' of the park	Noted	2(b)
1	General	Of the few we have spoken to, majority are not aware that the form to be completed is to be correlated to the actual document i.e. address areas associated within the document. This is in itself difficult for those that may not be intellectually capable or have the capacity to prepare such a submission. This is an issue that CALM needs to be made aware of and should accept all written submissions irrespective of their format	Submitters are not limited to the Public Submission brochure format which is a tool to assist us in preparation of the Analysis of Public Submissions document. All written submissions are accepted and analysed to correctly convey the submitter's position on the issues they raise, however formatting submissions according to the draft assists in clearer submissions	2(d)
1	General	The general public and very few recreational users of the area were originally aware of the document, let alone the changes proposed for this vast area until they were alerted to the fact by concerned locals and the reformed KOCO who called a public meeting chaired by the Hon Paul Omodei MLA, Member for Warren Blackwood	The Department attempts many avenues of reaching the public, for example, advertising and articles in local media and the formation of a community advisory group representing a wide cross section of the community	2(d), 2(g)
1	General	It seems that none of our comments to the Serpentine-Jarrahdale draft plan have been recognised or addressed	There is no record of your submission to the 1997 Serpentine National Park Draft Management Plan. Perhaps you are referring to your submission to the St Johns Brook draft management plan. That plan has not as yet been finalised and released	2(c)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	General	Unfortunately the conclusions are probably already in place. Public consultation of residents, ratepayers, recreational local users, retired CALM personnel, foresters - get them involved in management plans	The Department has a comprehensive program of public consultation with locals and stakeholders through public workshops and advisory committees	2(d)
1	General	Distribute more plans. Advertise more than one month in advance so people can submit their cases in plenty of time	Management plans have a statutory requirement to be advertised for a minimum of 2 months to ensure public awareness. This statutory requirement was complied with via advertising more than once in local and state media, and the public consultation period was over 4 months. The plan was available electronically and 700 copies were printed	2(d)
1	General	The draft is full of words and phrases like 'encourage outside organisations', 'identify risks', 'consult neighbours and other agencies', 'ban', 'list', 'close', 'apply conditions', 'examine', 'assist external research', but short on the positive management action sorely needed in our parks	Use of such verbs is a component of management action strategies which will have a beneficial impact on the park's values over the long term	2(d)
1	General	Management action to achieve the strategies	As above	2(d)
1	General	The Draft management plan lacks specific actions and finite commitments	As above	2(d)
1	General	There are major deficiencies in the management direction and resources available to implement a management plan for these parks that meets all the various values that these national parks can provide to both the local and wider community. It is of great concern that the body responsible for stewardship of the vast majority of public lands in WA is in many respects out of touch with community needs, obviously under-resourced and unable to make acceptable and sustainable land management decisions	The goals and strategies outlined in management plans are used by the Department to seek/justify funds and resources	2(c)
1	General	A land management plan needs to be a concise practical guide for positive action by CALM staff in the field and it must reflect the expected funding available	Management plans are written to meet the needs of a range of audiences including the general public. Funding is not mentioned in any of our management plans. The Department allocates funding on a yearly basis whereas our management plans have a life span of 10 years. The Department uses management plans to obtain funding from Government. There are also opportunities for external funding	2(e), 2(f)
1	General	We believe the greater detrimental issues arising from the management of the national parks as: Insufficient funds allocated for the management of ever increasing areas of wilderness, national parks and reserves	As above	2(c)
1	General	It is quite clear that national parks in WA and throughout Australia, are severely and chronically under-resourced. There are numerous examples of this issue and in the Shannon and D'Entrecasteaux Parks alone include examples such as: (1) Inadequate feral animal control; (2) Inadequate bush fire strategies; (3) Inadequate biosecurity measures; (4) Inadequate recreation policies and enforcement	As above	2(c)
1	General	The Dept of CALM no longer seem to have financial resources. Manjimup Shire would not have the resources required. Where does the money come from?	As above	2(c)
1	General	The government has bitten off more than it can chew in its massive expansion of national parks, but unless adequate funding is available for all the wish lists in glossy plans, there is little value in producing such an elaborate document. This type of document must cost valuable dollars in desk-bound officer-time that would have been far better spent on getting people out in the field	As above, management plans are required to be prepared by legislation	2(c)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	General	No money budgeted	As above	2(c)
1	General	No costs have been included, where is the money and resources coming from?	As above	2(c)
1	General	Where is your budget for the next 5 years?	As above	2(c)
1	General	There are various indirect financial implications resulting from CALM's current and proposed management of the National Parks that could place significant and unbudgeted pressure on the Shire of Manjimup	Noted, the Department will continue to liaise with the Shire of Manjimup	2(c)
1	General	We seek the support of the State government to ensure that CALM is appropriately resourced to ensure there is effective implementation and on-going management of the national parks. We seek appropriate management of the National Parks given its local, regional and State significance. We seek to ensure that this important area is appropriately resourced and financed in order that the National Park and all its values are effectively managed	As above	2(c)
1	General	The development and promotion of CALM sites without adequate consideration of the capacity of supporting local infrastructure is a concern. We accordingly seek funding support for the Council from CALM/the State government to assist in maintaining infrastructure managed by the State	This is outside the scope of this management plan	2(c)
1	General	All in all I believe CALM does a great job in balancing the environmental protection with public access. It would be a shame if the actions of a few were to be held against those that do the right thing. Is there a system in place whereby the public can report those damaging sensitive areas to you for you to take action? Are penalties stiff enough? Are prosecutions publicised enough to help deter offenders?	Reports of damage to the environment can be made to the local DEC office or Ranger staff, see local telephone directories for contact information Penalties are according to CALM Regulations 2002	2(a), 2(b), 2(c)
1	General	I have looked through many management plans over the years and was quite happy and surprised with this one, you seem to have put a lot of thought and effort into this one, well done to all concerned, but my first thought is that it does not matter how many great rules we have DO YOU have the means to enforce it? An example of this is one time our family was following a low loader with a D8 on the back, down the Windy Harbour Road, through our National Park and on every bump he went over and there are lots of bumps, great sods of red clay were being deposited along the road, all the way to Windy, when we complained to the local CALM office, we were told that because they had not seen it they could not act and a comment was made about the expense of taking him to court was just too much, You need many more troops out there policing and officers should be on par with fisheries and wildlife and be able to make arrests if necessary	Resources are always limited but the Department hopes through enforcing the CALM Regulations 2002 and visitor education that behaviour can be modified. As a note, Windy Harbour Road is not part of the park, it is a Shire road reserve	2(a), 2(b), 2(c), 2(f)
1	General	Put effort towards keeping the area just the way it is	Noted	2(a)
1	General	Australian Honeybee Industry Council supports the need for nature conservation and therefore sees management strategies designed to achieve such goals in the conserved forests of Australia as being highly desirable	Noted	2(a)
1	General	I support our national parks and particularly support a balanced approach to access and utilisation of these areas	Noted	2(a), 2(b)
1	General	This is not a submission form, it's a survey of the report	The submission form is in the layout of the plan to aid in the analysis of public submissions	2(g)
1	General	How easy was this plan to understand? Too many grey areas. Trying to confuse people e.g. proposed really means 'will do'	When the management plan is prepared the Department does not necessarily have all the information required and more detailed assessment is needed	2(d), 2(g)
1	General	The draft plan Introduction is detailed and effective. I sincerely support the need to protect the unique, natural and heritage features of the park and local environs within	Noted	2(a)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	General	<i>Change Department of Planning and Infrastructure to Department for Planning and Infrastructure</i>	Noted	1(e)
1	General	<i>Change references to Water and Rivers Commission to the Department of Environment</i>	Now Department of Water	1(e)
1	General	P55, third para, third line, <i>change 'scare' to 'scarce'</i>	Noted	1(e)
1	General	I would have preferred to have seen a near final draft of the plan so that the above slips and misinterpretations could have been corrected. I harbour continuing concerns that draft plans are not being distributed to those staff who can contribute usefully to the shaping of the document I'd suggest that all Program Leaders in Science Division should be invited to comment on plans at a late stage of their development	Noted, all program leaders are included in internal distribution	2(b)
	Preface			
1	Preface	The Increased Demand for and Use of the Parks section states that mining pressure is increasing. This is strongly disputed Cable Sands explored the park in the early 1990s, and the Jangardup South Excision was created by Government to allow consideration of mining. There are no recent indications of increased access requirements. Suggest remove the word mining	This has happened since the last management plan, hence mining pressure has increased	2(d), 2(g)
1	Preface	The Shannon and D'Entrecasteaux National Parks require maximum protection to guard against threats such as mining. Statutory safeguards and greater efforts are needed to secure that protection	Noted	2(a)
	Part A	Introduction		
2	Part A	The town of Northcliffe should be added to the list of towns in the region. Northcliffe calls itself "The Gateway to D'Entrecasteaux National Park" and it should be promoted as the site for the sort of tourist accommodation that cannot and must not be located within the parks (any commercial facility and anything other than small, basic key camp grounds and built accommodation)	Noted, town of Northcliffe added	1(e)
1	Part A	The Draft plan Introduction is detailed and effective. I sincerely support the need to protect the unique, natural and heritage features of the park and local environs within	Noted	2(a)
	2	Regional Context		
1	2	Tree Top Walk itself is actually just outside the South West Planning Region, as is about half of the Walpole Wilderness Area	It is just within the South West Planning Region	2(g)
	3	Management Plan Area		
1	3	Recognise it is the soft option of stopping the CALM management plan at the district boundary east of Gingilup swamps is not constructive or in the State's best interest, as it continues the problem of neglecting the very biodiverse Scott Coastal Plain area, currently isolated east of the Blackwood River. That CALM include all Scott Coastal Plain Reserves and National Park Planning in the D'Entrecasteaux Management Planning Framework. Rename an expanded Scott River National Park the Bibbulmun D'Entrecasteaux National Park (recognise this is the Bibbulmun Nyungar area)	Gingilup Nature Reserves are being covered in the planning process for the Capes Parks inclusive of Leeuwin Naturaliste National Park and Scott National Park	2(c)
1	3	Recognise that the State's biodiversity interests and recreation interests would be better served by treating all of this area, the Scott National Park, Scott Coastal Plain and D'Entrecasteaux National Parks as one management exercise	As above	2(c)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	3	D'Entrecasteaux National Park is presently made up of two reserves - 36996 and 43961. The latter was the former Banksia Flats Pastoral Lease and was created as a separate reserve in 1995, rather than adding the area to Reserve 36996. I have foreshadowed to DPI that we will be asking them to cancel Reserve 43961 and incorporate the area into Reserve 36996. The Team may wish to mention in the Plan that any future additions to the park should be included in Reserve 36996 rather than creating new reserves	Noted	1(e)
1	3	In 1996 a "wedge" of land was excised from the park to allow for the possible extraction of mineral sands by Cable Sands. That "wedge" is now Reserve 44705 (Attachment E) and is 400Ha in area. In the event that Cable Sands does not proceed with the proposed mine, this area will be added back into the park	Noted	2(a), 2(b)
1	3	Location 12897 (Attachment E) was transferred from Cable Sands to the Executive Director in 1998 as part of a package relating to the proposed Jangardup South mine project. Depending on whether the project proceeds or not, all or some of this block will become available to be added to the park	Noted	2(a), 2(b)
1	3	There is reference to the partly cleared land in the Cable Sand donation to CALM. However, there is no balancing statement that the majority of the donated block contains little-disturbed to undisturbed native vegetation that constitutes a significant and high-value potential addition to the NP. <i>Refer to the presence of the high-quality, biodiverse, native vegetation. Add: "Crown Grant 12897 also contains a large proportion of virgin native vegetation and some native vegetation slightly affected by grazing in the 1980s"</i>	Information on the vegetation will be incorporated, however the whole block has been grazed and there has been extensive clearing	1(e)
1	3	This Cable Sands donation potentially increases the set-back distance between cleared farmland and Lake Jasper from about 250m to over 2.6km, markedly improving protection for the water quality in the lake. <i>Refer to that land also providing a much larger buffer for the lake. Add "Crown Grant 12897 also increases the buffer, and hence protection for the water quality, between Lake Jasper and farmland from 250m to over 2.6km"</i>	Noted, however in the event that mining does not take place, then only a small buffer will be added to the conservation estate	1(e)
1	3	The D'Entrecasteaux National Park section omits that the park is bordered by the CALM Act 5(1)(g) reserve at Jangardup South and the Quannup Pastoral Lease (unless this is what is meant by an enclave. However, the NP does not wrap around the pastoral lease). <i>Add the term '5(1)(g) reserve' and 'pastoral lease'</i>	Agreed, with regards to 5(1)(g) however, the park does enclose Quannup Pastoral Lease as the coast is part of D'Entrecasteaux National Park	1(e), 2(g)
1	3	If Cable Sands decides to not proceed with the mining proposal, the State can retain the parcel and add it to the NP. <i>Add qualifying phrase on p4, para 8, "unless Cable Sands decides to not proceed with a mining proposal"</i>	There have been negotiations with Cable Sands that if they do not decide to mine then a portion of land will become available for National Park	1(e)
1	3	Will Broke Inlet eventually become part of D'Entrecasteaux?	Broke Inlet will become part of a separate Broke Inlet Marine Reserve that has been proposed	2(b)
1	3	There are two recreation/camping reserves within the park which are vested in the Shire of Manjimup: Reserve 38881 of 189Ha at Windy Harbour and Reserve 19787 of 40Ha on Broke Inlet, commonly called Camfield. Over the years there have been suggestions that Reserve 19787 should be absorbed into the park and that issue might be raised again in submissions concerning the Draft Plan. If the Shire raises this as a possibility, it should be given serious consideration	Noted, however, the Shire is not supportive of this at this time and there are several issues to be resolved with the land including remediation of an old refuse site	2(a), 2(c)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	3	I strongly agree with point 4 on page 14, relating to the purchasing of private property within the parks when it becomes available. This should include that all freehold properties at Camfield should be bought back by the Government at the time when they might be offered for sale by the current owners. In this regard a "Memorandum of Intention" should be exchanged with the current owners. The historic reasons no longer apply who those freehold properties were established many years ago. Camfield, like Windy Harbour, was never meant to become a freehold township. Purchase all freehold properties at Camfield when offered for sale	As above	2(c)
1	3	"Clare House" is only occupied during peak holiday times. It would make an excellent facility to become a base for educational and interpretive activities, particularly so, once the area will have obtained World Heritage Area status. For this reason alone the property should in due course revert to Crown land. Such a move would agree in principle with the intention of the Shire of Manjimup's Town Planning Scheme No.4 which will recommend that "all three freehold properties (at Camfield) be rezoned to a 'rural conservation' type zone to provide opportunities for environmentally sustainable and low-key tourist and recreational development	As above	2(c)
1	3	We support the Shire of Manjimup retaining the on-going management responsibility for Reserve 19787 and acknowledge that there is a need to commit appropriate resources to effectively manage the reserve	Noted, this is beyond the scope of the plan	2(c)
1	3	We seek the support of the State government to obtain the power to lease on Reserve 19787	As above	2(c)
1	3	Inform the 'temporary occupants' of buildings on Reserve 19787 regarding the above and seek their views regarding the preferred tenure and management of the reserve	As above	2(c)
1	3	Seek via advertising, comment from the wider local community following the receipt of the State government's advice regarding the power to lease on Reserve 19787	As above	2(c)
1	3	Recognise that a management plan is required to be prepared for Reserve 19787 and this is likely to commence in 2006-2007 subject to funding through the budgetary process and/or the availability of Shire staff administration resources	As above	2(b)
1	3	Broke Inlet (Camfield) huts should be rationalised. The remainder of the huts should be retained and managed by the Shire of Manjimup	As above	2(c)
1	3	Apply to gain control of unallocated Crown land reserve between the road reserve and Shire Reserve 19787 to gain legal access to our reserve	Noted	2(c)
2	3	Strongly support the purchase of private land within the national parks	Noted	2(a)
1	3	I commend CALM for the suggestion of the purchase of enclaves as they come onto the market, including the pastoral lease called Quannup and incorporating them into the national parks, like the five properties purchased that were previously owned by Cable Sands	Noted	2(a)
912	3	Strongly support the purchase of private bush blocks within the National Parks, including the Quannup pastoral lease	Noted	2(a)
4	3	Support. Buying enclaves as they come onto the market and incorporating them into the national parks (we congratulate the Government and CALM for buying the five properties owned by Cable Sands)	Noted	2(a)
1	3	Buying back any pockets of land and including them in the national parks to be commended	Noted	2(a)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	3	Government should buy back all enclaves when they come on the market, rehabilitate and transfer into the national park	Noted	2(a)
2	3	All enclaves should be purchased by the government when they come on the market, rehabilitated if disturbed or degraded and included in the national parks. We congratulate the government and CALM for buying the enclaves owned by Cable Sands	Noted	2(a)
1	3	The government should buy back all enclaves when they come on the market and include them in the national park where they may require rehabilitation. The buy back of Cable Sands land was commendable	Noted	2(a)
1	3	The Draft Plan indicates that at the time of writing there were 19 privately-owned enclave blocks within the park. My recent research indicates that this figure is in fact 21. With current planned purchases and a suggested boundary change, I would like to think that we could reduce this figure to 7	It is noted that several enclaves have now been purchased and the final plan will include the latest information on these purchases	1(a)
1	3	Locations 1226, 1147 and 8520 are owned by the Moore family, Alan Giblett and John Evdokimoff. I have the funds to purchase these three blocks and, hopefully, negotiations will be successful and we will acquire them in the near future	Noted, the first two purchases have been completed	1(a)
1	3	The former Loc 11522 on the east side of Broke Inlet has since been subdivided into three lots (Attachment C) and this is the reason why the total number of enclave blocks is 21 rather than 19. These are very small blocks - the total area being just 4Ha and purchase would be a low priority. It was a shame that subdivision of this block was permitted	Noted	2(b)
1	3	Location 5273 at Fish Creek is unlikely to ever be sold by the Muir family	Noted	2(b)
1	3	Location 7965 (Sandy Peak) is owned by Shellbay Holdings. Should the property come onto the market, we should attempt to acquire it	Noted	2(a)
1	3	The former Loc 153 at Malimup is now lot 20. This valuable property is owned by Chris Davies and it is unlikely he would be interested to sell it	Noted	2(b)
1	3	Locations 13101 and 2928 are just inside the park, west of the Donnelly River (Attachment D) Location 13101 is partly cleared and is used for grazing of cattle by Murray Scott. It is unlikely that we will be able to acquire either of these properties and we should consider amending the boundary of the park so that these two blocks are placed on the boundary of the park and cease to be enclaves. This would involve the transfer of about 685Ha from the park into adjacent State Forest	This is not supported by local Departmental management. The draft plan adequately covers issues associated with enclaves to the NP. Changes to the boundary will have no gain for the Department since the locations will still be enclaves within Departmental managed lands	2(d)
1	3	Supports purchasing the Quannup pastoral lease and acquiring other areas with high conservation value as they become available and adding them to the national park estate	Noted	2(a)
1	3	Location 147 is owned by the Scott family. It is "inside" the Quannup Pastoral Lease It does not have legal access. The family has a stone cottage on it and use it for holidays. It is unlikely that the family will sell the property	Noted	2(b)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	3	There is one pastoral lease - Quannup - remaining inside the park. Funds have just recently been provided to enable us to endeavour to buy back this lease. If that is not successful, the lease will expire on 30 June 2015 and the area of 4311Ha will then be added to the Park. This proposed addition is ID 203 in the 2004 Forest Management Plan	The leaseholders did not sell lease but negotiations are continuing	2(b)
1	3	There are two further additions to the park proposed in the 2004 Management Plan: ID 203A which involves 600Ha of State Forest adjacent to Jangardup Road; and ID 225 which involves 1000Ha of State Forest east of the Gardner River. Both of these proposed additions will be addressed in the implementation of the 2004 Forest Management Plan recommendations	Noted	2(a)
2	3	Section 5(1)(g) Reserve should be reverted in the National Park once mining is excluded	Noted	2(a)
1	3	Locations 3869, 5600, 5602, 8516 and 8519 are currently owned by Cable Sands. We have come to an understanding with Cable Sands concerning these five blocks and this purchase should be completed in the near future	The Department has now purchased these properties	1(e)
1	3	There are approximately 180 surveyed blocks within the park. Most of these are already part of the park. With the exception of those which are privately-owned enclave blocks, all these surveyed blocks should be cancelled and consolidated into one location number (or at the most, four). I have already discussed this with DPI and will request this when I advance the cancellation of the surplus road reserves	This process is underway	2(b)
1	3	Add East Augusta foreshore reserves to National Park, specifically, reserves 3588, 35745, 39434, Lot 47 Augusta, 35774, 18644	Outside planning area	2(c)
1	3	Add unallocated Crown land to be added to national park from along the south coast, and the Scott River Suggestions include UCL 754, UCL 4973, Reserve A12591, UCL between Loc 753 and Nature Reserve at Brennon Bridge	As above	2(c)
1	3	As part of the approval process for water corporation access to Yarragadee require Water Corporation purchase and support future replanting of uncleared and semi cleared farmland containing wetlands and key linkage corridors for parks along the Blackwood and Scott Rivers, South Coast and other key strategic corridors	The Department supports creating corridors however this is beyond the scope of the Management Plan	2(c)
1	3	Locations 2416, 2417, 5468 and 5469 on the southern bank of the Warren River (Attachment B) are not true enclaves as they are not totally surrounded by the park; they would be better described as "intrusions". If we had unlimited funds we could consider buying these blocks should they come onto the market. However, we don't, and in the circumstances I do not regard them as priority purchases and have made no recent contact with the owners	Noted	2(a)
1	3	There are approximately 40 road reserves within the park. With the exception of those which provide legal access to privately-owned enclave blocks or where they contain constructed roads which provide access to destinations such as Windy Harbour or Broke Inlet, all the remaining road reserves should be cancelled and the strips of land concerned be added to the park I am currently working on this project	The Shire of Manjimup is progressing these however the Shire of Nannup was not supportive	1(a)
1	3	Much of the draft plan only applies to the D'Entrecasteaux National Park or to parks in general while the specific needs for management action in the Shannon National Park are conspicuously absent	The Department aims to include adjacent reserves within each planning process which have common elements and issues and/or as in this case historical integrated management. Suggestions on what is absent would have been useful. Your comment will be taken into account when generally finalising plan	2(b)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	3	The Shannon National Park is characterised by large areas of high forest, much of it subjected to harvesting disturbance and hence with limited tourist values. The D'Entrecasteaux National Park on the other hand has beaches, sand dunes, wetlands, inlets, estuaries and lakes, aspects that are highly valued tourist attractions. Its vegetation is largely coastal heath with only scattered wooded hills. The draft plan focuses strongly on attractive aspects of coastal management of the D'Entrecasteaux National Park and fails appropriately to address the needs of the high forest in the Shannon National Park	As above, the threats to natural values in Shannon as outlined in the draft plan are perhaps not as great and as visitor pressures in D'Entrecasteaux NP are greater there is a higher level of focus on D'Entrecasteaux National Park	2(b)
1	3	I believe the draft is an appropriate plan for the D'Entrecasteaux National Park while there is a need for a separate management plan for the Shannon National Park. It deserves its own plan because the combined draft plan fails adequately to meet the management requirements for its high forest. The draft highlights the significant difference in the hydrology of the two parks (p24) " <i>The groundwater on the Shannon plateau responds relatively slowly to seasonal differences in rainfall</i> " and " <i>In the coastal and wetland areas, the groundwater systems respond more rapidly to rainfall</i> "	As above	2(b)
1	3	Separate management plans should be prepared for each of the two national parks. The Shannon National Park has large areas of high forest while the D'Entrecasteaux National Park is predominantly open coastal "flats" with scattered wooded hills, punctuated with beaches, sand dunes, wetlands, inlets, estuaries and lakes. They are very different ecologically and in terms of their interaction with the public	As above and usually there is more than one national park in a management plan	2(b)
1	3	The draft plan focuses strongly on attractive aspects of coastal management of the D'Entrecasteaux National Park but fails to address the needs of the high forest in the Shannon National Park	As above	2(b)
1	3	The plan is long-winded and should be rewritten as two separate and concise plans spelling out management action for each of the national parks	As above, and some individuals/group like to have detailed plans	2(e)
1	3	Land adjacent and nearby to the national parks presently categorised as unallocated Crown land (UCL) should be addressed in the management plan with appropriate recommendations for the future management if opportunities arise within the life of the management plan. This will provide surety for the Conservation Commission of Western Australia if the management of the UCL is raised as an issue in the future (which is highly likely in the context of the proposed Augusta Walpole Coastal Strategy).	This would be an issue for the adjacent management plan for Gingilup Swamps	2(c)
1	3	UCL abutting western boundary of D'Entrecasteaux National Park in vicinity of Black Point: Advice from relevant local government authorities to the DPI is that Council is not prepared to take on vesting of the coastal strip due to resourcing issues. The long-term management of the coastal strip as it impacts upon the continued operation of the national parks is an issue for consideration. The plan could provide guidance by recommending a plan of action for either including or excluding the coastal strip into/from D'Entrecasteaux National Park in the future	As above	2(c)
1	3	I fully support extending the park boundaries up to the low water mark	The draft states it is already gazetted to Low Water Mark	2(a), 2(g)
8	3	Do not support any recommendations to extend the boundaries of the NP to any low water mark on the southern ocean beaches	As above, the National Park already extends to low water mark along the coast as Action 10 on p28 of the draft states, it is only possibly one river that needs to be changed	2(g)
1	3	Boundaries of the D'Entrecasteaux national park should not include low water mark. To do is to effectively lock people out from the beaches. City people have free access to their beaches and so should country people. One specific access track should be made	As above	2(g)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
		available for persons wishing to relax and go fishing and who do not wish to enter the actual national park		
1	3	Include the D'Entrecasteaux National Park in the Walpole Wilderness Area. As the Shannon National Park is already included in the Walpole Wilderness Area, the D'Entrecasteaux National Park should be included as well. This would have the effect that both the Shannon National Park and the D'Entrecasteaux National Park can be nominated simultaneously for World Heritage Listing	D'Entrecasteaux will have separate wilderness areas and Shannon NP is not in the WWA MP	2(c)
1	3	There is small (54 Ha) section of the Park isolated from the main body of the park by Long Point Road - see Attachment A. This small section should be excised and added to Walpole-Nornalup National Park. I have foreshadowed to DPI that we will be seeking this Long Point Road should be the clearly-identifiable boundary between the two parks	Boundary will remain where it is as road may change	2(e)
	4	Key Values		
1	4	P6 first dot point. Two dot points under Economic Values refer to tourism only. There is a titanium mineral deposit at Malimup along approx. 20km of the shoreline. This was located by Cable Sands during its exploration in the early 1990s. Cable Sands decided that to propose mining the deposit was inappropriate, and surrendered its title over it. In order to secure Government management of access to the deposit, the Minister for State Development has declared a Section 19 Exemption over its extent. This deposit is imprecisely defined, but could be larger than Jangardup deposit. Until that mineralization is converted to marketable product (this would require some future Government decision to support mining), the State and the community are not realizing the economic and social benefits this would create. While this is not an argument being presented to allow for mining, the community should be made aware of the direct economic cost of conservation. <i>Refer to the fact that "Malimup titanium mineral deposit occurs within the park, and Government has secured access considerations through Mining Act procedures"</i>	Noted	1(a)
1	4	We encourage the use of a 'triple bottom line' of social, environmental and economic sustainability. The draft management plan appears to be heavily weighted towards the environmental considerations at the expense of social and economic considerations. In the context of the Department of Sport and Recreation Mission Statement, we would prefer to see an increase in the social aspects of access to the National Parks in the DMP	The Department is bound by legislation to put environmental considerations first, however we do aim to provide many social and economic benefits throughout our plans	2(f)
	4.2	Recreational Values		
1	4.2	The Recreation Values should probably mention that much of the attraction is the minimally developed or essentially natural recreation opportunities	Noted, the values refer to wilderness and nature-based recreation	2(a)
1	4.2	The wilderness quality is already there and is not to be changed. There is potential to create areas of gazetted wilderness, but whether the wilderness areas are gazetted or not, the quality will be maintained	Noted, this will be clarified	1(e)
	Part B	Management Directions and Purpose		
	6	Vision		

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	6	Unless there is a significant change in current management strategies, particularly with fire management, the natural (biodiversity) values of the park will be severely diminished by 2015. That is because there is a substantial backlog of long unburnt coastal vegetation in the park, which, if not prescribed fuel reduction burnt (as soon as possible) will very likely be burnt in excessive high intensity and damaging wildfires within the park boundaries	The draft does recommend changes in fire management however it does not focus on retaining the current approach to fuel reduction burning. There is an adaptive management trial taking place in the Coodamurrup area that is looking at more frequent introduction of fire to create a patchwork of burnt and unburnt areas and a variety of seral stages. More detail of this trial can be obtained from the Senior Ranger at the Pemberton Office. Also the EPA undertook an independent review of the Department's fire management and this is available on the web at www.epa.wa.gov.au search: Bulletin 1151, Review of the Fire Policies and Management Practices of the Department of Conservation and Land Management	2(d), 2(e), 2(f)
2	6	What is happening to the parks is more than threats, which implies only potential harm. The harm is actually occurring, so the word 'assaults' is more appropriate	"Assaults" is too strong a term, "threats" are able to be ameliorated through active management strategies engaging community ownership and support	2(d)
1	6	While detailed to the extreme I agree with the general overall concept and hope that the finer detail is taken into consideration where important to local communities and the ongoing and evolving history/heritage of local environs	Noted	2(b), 2(g)
2	6	All recreational activities must be compatible with the conservation values of the parks. <i>Change to "The parks will continue to support a wide range of nature-based recreational activities that are compatible with the conservation values...."</i>	Noted	1(e)
2	6	The parks are remote and it would mainly be activities outside the parks that affect remoteness. What should be preserved are the wilderness values of the parks, of which remoteness is only one criterion. <i>Change to: "...whilst preserving the wilderness values of the parks"</i>	Noted	1(e)
2	6	The vision should specify what sort of involvement is envisioned for the traditional owners. <i>Change to "The Indigenous cultural heritage of the parks will be kept alive and promoted by active and ongoing involvement in the management of the parks of the traditional owners who will have been able to reconnect with and care for their country"</i>	This has been left open to allow flexibility of specific actions that will fulfil the goals of the vision	2(d)
2	6	It is preferable to spell out what 'sustainably managing' should mean. <i>Change to "The vision also reflects the key values of the parks and the importance of managing those values so that they are protected and maintained in the short, medium and long term."</i>	Sustainable means long term	2(d), 2(g)
2	6	It is not only the local community that should highly value the parks and be involved in their protection and conservation. That should be the vision for the wider community as well. <i>Change to "The local community as well as the wider community will highly value the parks and will want to be involved in their protection and conservation"</i>	Noted	1(e)
	7	Legislative Framework		
1	7	A "National Park" is described as: a tract of land declared public property by a national government with a view to its preservation and development for purposes of recreation and culture	In Australia, National Parks are defined as those lands and waters identified as having recreation and conservation values significant at the national level, administered by state or territory governments	2(b)
2	7	The statement that this <i>management plan is required to conform to the Bush Fires Act 1954 and satisfy the Fire and Emergency Services Authority that adequate fire protection will be provided for the reserves (see Section 22 Fire)</i> is not correct. It appears that this relates to S34 of the Act. It relates to neighbours and Fire Control Officers (FCOs) entering Crown land to construct fire breaks and to undertake hazard abatement or, where an approved plan is in place, that neighbours and FCOs are not longer permitted under the Act to undertake such work. "Section 22 Fire" of the DMP also does not add value in relation the Bush Fires Act	The statement in the plan is correct. All landholders are subject to the Bush Fires Act 1954 and the relevant sections regard the interplay between adjoining landholders in the event of fire (sections 34(1)(1a)(a) and 45). A landholder which wishes to assert authority for fire management for its landholdings has to have a management plan approved by FESA	2(g)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
2	7	<i>Under section 45 of the Bush Fires Act, the Department may take responsibility for the suppression of fires threatening the conservation estate.</i> This is an interesting word game. This section of the Act authorises designated CALM officers to take charge, if they wish to do so, rather than the Department to take charge	Any DEC officer performing any function in the course of their duties is doing so under the imprimatur and on behalf of the relevant Act and with authority designated by the Executive Director	2(g)
1	7	p8, para2. Under Section 45 of the Bush Fires Act.... An authorised CALM officer may take supreme control of fires burning on or in forested land or on or in Crown lands. This is significantly different to your text that states the Department may take responsibility for suppression of fires threatening the conservation estate	Noted final plan will be amended to accurately reflect wording in the relevant legislation	1(e)
1	7	The State Government has made a commitment as part of its "Eco-tourism Strategy" to proceed with World Heritage nomination for the Walpole Wilderness Area, which includes the Shannon National Park. I therefore suggest that it should be mentioned in this Plan that the Shannon National Park might in due course become part of a World Heritage Area. Placing the Plan in such broadened context will greatly increase its long-term importance as it depicts the planning area as a conservation area of World Heritage Significance. This in turn would have the effect that our Government would be much more inclined making available increased financial resources for the implementation of the plan than it would make available for a less important area	Text will be added to outline the intention of the Government to seek World Heritage Nomination for the Walpole Wilderness Area and that this may have implications for the management of Shannon National Park	1(c)
1	7	I also suggest that it should be mentioned in this plan that the planning area is the most westerly extension of the Gondwana Link Project that will link the planning area in the West with the Fitzgerald National Park region in the East. The entire South Coast of Western Australia from Augusta to Hopetoun should therefore be seen and managed as an interconnected bioregion of World Heritage Significance	Noted	2(c)
1	7	In order to increase the chances that the World Heritage Committee will inscribe the Walpole Wilderness Area in the World Heritage Register, everything should be done at this point in time to ensure that the prerequisites for successful listing will be fulfilled, such as having no feral pigs in the nominated area, few environmental weed species, no horse-riding activities, no power-craft on lakes and no mining activities	Noted	2(a)
1	7	It should be anticipated that this plan will form a major part of the documentation submitted to the World Heritage Committee when nomination for inscription on the World Heritage List occurs. Each recommendation set out in this plan should be scrutinized in detail whether or not it contributes to the ultimate aim to have the planning area designated a World Heritage Area which could occur within the life of this plan	Noted	2(c)
1	7	P8, last para above major heading notes that according to Section 32 of the Mining Act, that the Mining Act takes precedence over the CALM Act. That principle is only partially correct, and without qualification it could be alarmist to readers. There are checks and balances in place to protect the conservation values and it is actually Section 4 of the CALM Act. Replace " <i>Section 32 of the Mining Act</i> " with " <i>Section 4 of the CALM Act</i> "	Though checks and balances exist, the ability remains for the Mining Act to be exerted over the CALM Act if it is a desire of Government and Parliament. The text of the draft is not referring to section 32 of the Mining Act but referring the reader to section 32 of the draft which deals with mining	2(g)
1	7	There is a prohibition on any mineral or petroleum resource-related activities within the area of the national parks unless the Minister for the Environment gives approval, and that means companies cannot simply use the Mining or Petroleum acts to access the areas. <i>Add at the end the phrase, "Although such activities are subject to the concurrence of the Minister for the Environment, any Mining and General Purpose leases require the approval of both Houses of Parliament prior to being granted"</i>	Noted, addition of the recommended text may aid clarity	1(e)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
	8	Management Arrangements with Aboriginal People		
1	8	Joint indigenous land management be implemented; if acceptable with the local Noongar people, as an alternative to the existing MOU	The Department will continue to work towards indigenous involvement	2(a), 2(d)
1	8	Would also like to see joint indigenous land management	Noted	2(a)
1	8	Opportunity to improve protection and recognition of Nyungar cultural values in the Bibbulmun (Scott River) D'Entrecasteaux area and to implement improved training and career opportunities for joint management and employment of additional Indigenous Rangers	Noted	2(a)
1	8	If we are truly going to recognise and respect traditional Indigenous ownership and deep knowledge of the land, beyond tokenism, we must start inviting joint management of the land. I request that this happen for the Shannon and D'Entrecasteaux National Parks and it be fully recognised within this management plan	Noted	2(a)
912	8	Would also like you include the following in the final management plan: Joint indigenous land management (p10)	Joint indigenous land management at this time is evolving	2(a)
1	8	"Noongar people lived and cared for the land with one basic and important understanding - people were a part of the environment, not separate from it" I would contend that so are the people who currently live there	Whereas many non-indigenous individuals may have an affinity for the natural environment, historically, relationship to the land was fundamental and central to Aboriginal culture, influencing everything from kinship to territory and harvesting	2(e)
	9	Management Planning Process		
1	9	Prepare this plan and the Walpole Wilderness Area management Plan in such a way that the Plans can be used as key documents when nominating the Walpole Wilderness Area including the Shannon and D'Entrecasteaux National Parks, for World Heritage listing	Noted	2(c)
	10	Performance Assessment		
1	10	Key indicators have been included but no timeframe and there isn't any time for further submissions or disagreement once you have put in place what you want	The Conservation Commission is responsible for developing and implementing the auditing function and programme and reporting timeframes are included in Appendix 2 of the draft plan	2(d)
	Part C			
2	Part C	P12, first para, last line, <i>substitute "militate" for "mitigate"</i>	The Corporate Plan (DEC 2007) which has been revised to reflect the merge with the Department of Environment says it this way "the lack of scientific certainty shall not be used as a reason for postponing measures which seek to protect or restore the environment or prevent loss of biodiversity". The plan will be amended to this wording	1(e)
1	Part C	The sections of the plan devoted to detailed academic theory about biodiversity are not appropriate in an action plan, nor should they have been given special status of inclusion in an official publication. This academic material should be offered as a separately published (and clearly designated and unreferenced) "discussion paper" which can then be subjected to peer review by scientists and managers	Background info is included for the strategies	2(c)
1	Part C	Too much focus on poorly researched impact on the environment and not enough on fact and operational reality	The plan was prepared with the best available scientific research available	2(e)
1	Part C	I believe the natural environment has a way of recovering from all sorts of destruction	Sometimes nature needs to be aided through rehabilitation of disturbed areas	2(b)
1	Part C	We are being 'natural environment' out of existence	Preserving the natural environment for future generations is one of the primary functions of the Department	2(f)
1	Part C	We are also concerned that the primary thrust of the management plan seems to be the control of human access and activity with a lesser apparent commitment to the very significant threats presented by weed invasion, feral animals (especially pigs) and Phytophthora cinnamomi infection	Restrictions on human access limits the ability for these issues to be introduced and spread. Other more detailed plans and programs always work in conjunction with our management plans. For example, District Weed Control plans, the Hygiene Manual, threatened species recovery plans, Western Shield	2(d)
1	Part C	Environmental Weeds Action Network wrote a submission on the Department's Biodiversity Conservation Strategy. The Management Plan for the Shannon and D'Entrecasteaux National Parks will need to be compatible with the Strategy	Noted. Reference to the draft Biodiversity Conservation Strategy has been added to the plan	1(e)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
	11	Biogeography		
1	11	That the process be used to finally implement the System 6 Red Book recommendations for inclusion in the conservation estate	The parks are within System 2 and the Red Book recommendations for a south coast national park and a Shannon karri national park have been implemented by the creation of D'Entrecasteaux National Park and Shannon National Park (refer to page 1 of the draft plan)	2(a)
1	11	Acquiring more land to add to the parks may assist to ensure a CAR reserve system but also adds to the problem that currently CALM is unable to properly manage the areas it has already	Obtaining resources to implement the plan is undertaken as part of the annual budgeting process	2(d)
1	11	Commend CALM on the protection of 30% of the Warren Bioregion. It is important to emphasise not just the area but also the quality of the ecosystems protected. For instance, decrease the area of quality habitat if the 5(g) reserve is mined	Noted, however the 5(g) reserve is a small percentage of the Warren Bioregion	2(d)
2	11	Key Point 7 - All twelve ecosystems should at least meet the agreed target for the national reserve system	Agreed	2(a)
2	11	Strategy 1. Agree. We congratulate the Government and CALM for buying the five private enclaves owned by Cable Sands	Noted	2(a)
2	11	Strategy 2- 5 Strongly agree	Noted	2(a)
2	11	Strategy 6. The strategy should be to implement not just take into account any increases to the targets for a CAR reserve system recommended over the life of the Management Plan	Noted, the draft will be amended	1(d)
1	11	Opportunity for a well disposed WA Government to implement a Bibbulmun World Heritage Area and to implement the purchase of threatened corridors of wetlands from farms for subsequent reservation in expanded national park using financial support from Water Corporation	Noted. The proposal for the listing of the area as World Heritage is a separate and independent planning process	2(c)
	12	Climate Change		
1	12	The first paragraph commences: "Climate change has come about..." There is still rational questioning of climate change by a number of reputable scientists and this statement does not allow for any possible doubt. The hypothesis of "Climate Change" is not a fact, but just that, a scientific model. Even the connection with greenhouse gasses is disputed in some circles. It is inappropriate for a Government document, and particularly from an agency with a strong scientific background, to present such ideas as confirmed facts. Rather, these documents should be more objective, recognizing that there is phenomena that could be interpreted to indicate climate change and that modelling of greenhouse gas emanations can explain temperature rises. However, confirmation of the hypotheses will only occur in the future	The information presented represents the Department's and Government's position that climate change is a threatening process requiring management. Information presented has been appropriately referenced	2(e), 2(f)
1	12	Amend the first sentence to: "Greenhouse gas emissions (CO2, CH4, Nn0etc) can be modelled to imply that the World's climate will change in the future, and some authorities are suggesting the evidence can be interpreted to imply it is occurring now (list refs). However, the Earth's climate has fluctuated naturally throughout geological time. Hypotheses of the correlations of interpreted temperature rises should be noted and planning put in place to minimise unacceptable consequences. For example, Collins et al (2000) and Hughes (2003) consider there is a measurable Australia-wide temperature rise of 0.8 degrees C during the last century, but mostly after 1950."	As above	2(e), 2(f)
1	12	pg15, Para 2, last sentence: insert 'restricted prescribed burning seasons'	Change made	1(e)
1	12	The long term effects of climate change could affect groundwater recharge	Agreed	2(a)
1	12	p15, para 5. One of the dot points referring to derived changes from climate change should note the potential for changing fire regimes due to increasing aridity	Change made	1(e)
2	12	Key Points - Predictions for climate change. Even more alarming is CSIRO's worst case scenario of a further 60% decrease in rainfall by 2070	Noted	2(b)
2	12	Key Point 4 should be amended to state inappropriate fire management threatens species and ecosystems and increases their vulnerability to climate change	This was inferred, strategy will be reworded to state appropriate fire management could help improve...	1(e)
2	12	Objective: The objective must be to understand and minimise the effects of climate change on the biodiversity of the parks	Changed to "understand and respond to the effects of climate change on the biodiversity of the parks"	1(d)
4	12	The effects of climate change on the parks should not just be 'considered' (p16) but minimised by, for example, maintaining corridors of long unburnt vegetation	As above	1(d)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	12	The draft says the objective will be achieved by looking at potential vulnerability, protecting adequate and appropriate space [whatever that means?], add to endangered species recovery plans and put limits on non-climate change stresses. This is not a plan to do anything	This actions were based on the recommendations of the Indian Ocean Climate Initiative (refer to page 16 of the draft plan). However, strategy 1 will be amended to be more specific and strategy 2 will change "space" to "area" (even though this was the wording used by the IOCI). As you would know, climate change is a new issue for management plans and the level of information at a regional scale is still very poor, and so as the issue is explored and researched, the actions will become more specific. Already since the draft plan, further actions that have been developed and will be included in the final plan	1(d), 1(e)
1	12	The very real negative impacts of human induced climate change needs to be fully factored into the management plan. Some environmentalists believe that climatic change will have the biggest and most widespread impact on our environment in the future. There needs to be a lot more evidence of how climatic change has been factored into the management plan. This could include fully protecting certain areas of different vegetation complex types from as many negative impacts as possible including fire. Even further protecting certain areas as Scientific Reference Areas could be considered	Noted. As above	2(a), 2(d)
1	12	From a Government planning perspective it is prudent to consider actions that should be taken to minimise any consequences of greenhouse gas emissions and future climate change	As above	2(a), 2(d)
2	12	Strategy 1. Funding must be provided to carry out this research and its progress must be reported	Noted but not role of management plan to determine source of funding this being undertaken by the Department as part of its annual budgeting process	2(c)
1	12	I agree that investigation of the potential vulnerability of the parks' species, including native fish, to climate change, is required	Noted	2(a)
2	12	Strategy 4 - Prescribed burning is a non-climate stress over which park managers have control. Its use must be strictly controlled	Noted. Fire management strategies are outlined in section 22 (refer to section 22 of the APS for further discussion on prescribed burning)	2(a)
	13	Geology, Landform and Soils		
	13.1	Geology		
1	13.1	The geology section states that the Southern Perth Basin contains up to 6km of sediment. The southern part of the basin is actually interpreted to contain up to 11km, although 6km is the thickness under D'Entrecasteaux NP. Adjust to read: "The Perth Basin under parts of the D'Entrecasteaux National Park contains up to 6km of sedimentary rocks, the oldest being Permian (approximately 290 million years old)."	Noted	1(e)
1	13.1	The geology section refers to rifting beginning in the Early Cretaceous. Rifting probably commenced in the Triassic, in the time range of 240-250 million years (Ma) and the breakup, when the Indian Subcontinent separated from Australia, occurred at about 140 Ma. Adjust to read: "Rifting of the basin began in the early Triassic (250Ma) and continued until continental breakup, when the Indian Subcontinent separated, in the Early Cretaceous at about 140Ma."	Noted	1(e)
1	13.1	The majority of the tectonism was probably related to this breakup during the Early Cretaceous. However, note that the breakup between Australia and Antarctica did not occur until 75 Ma after this time. Adjust to read: "Tectonism, accompanied by faulting and folding of the Perth Basin sediments occurred during the breakup phase. Australia and Antarctica breakup occurred about 65Ma and led to the re-arrangement of the topography of the south coast, formation of the Ravenswood Ramp and Jarrahwood Axis and development of the present river systems. Deposition of sediments in the Bremer Basin (Eocene age, 27-54Ma) occurred in this rifting and breakup period and these marine sediments now cover 70% to 80% of the parks	Noted	1(e)
1	13.1	The Bunbury Basalt isotopic ages of 130 and 123 Ma. "The Bunbury Basalt, that outcrops in beautiful columns at Black Point and at the mouth of the Donnelly River, flowed out of volcanoes at 130Ma and 123Ma. Cainozoic (63Ma to now) deposits and weathering profiles overlie most of the older rocks and sediments, and include the extensive laterite profiles"	Noted	1(e)
1	13.1	The known minerals section only refers to potentially economic mineral deposits and not to a broad reference to minerals per se. It is recommended that there be a separate Section 14 Mineral and Petroleum Deposits as provided to CALM in draft comments in February and not confuse economic factors with geological factors	The structure of management plans provides for mining information in section 32 Mining	2(h)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	13.1	Coal is referred to, there is coal at a depth of several kilometres below the surface but none near the surface and if it is important to mention the presence of the rock it should that it is an excessive depth	Noted	1(a)
	13.3	Geoheritage		
1	13.3	Geoheritage sites (sites of geological significance) according to the Draft State Policy on Geoheritage are those features that the Director of the Geological Survey has placed on the State List after consideration by a reference group. In D'Entrecasteaux national park they include the 3 sites that are identified. The sites that Semeniuk proposed for the RFA have not been proposed nor considered by the reference group and therefore are not yet State Geoheritage Sites. Refer to the Semeniuk sites as his personal suggestions and that they are yet to be proposed to be added for consideration for ratification through State processes	The draft plan clearly indicates that the Semeniuk sites are other sites of geoheritage derived from the RFA assessment. However, further clarification will be made that the Geological Society of Western Australia endorses the Carter (1987) sites	1(e)
1	13.3	The three geoheritage sites (Black Point, Windy Harbour and Mt Chudalup) are regarded as robust, i.e. they are not vulnerable to low-key activities	Noted	2(a)
1	13.3	Formally the Windy Harbour granulite outcrops (those that are accessible) are not within the park but are in the Windy Harbour recreation and camping reserve 38881, vested in the Shire of Manjimup. Management issues therefore are under the responsibility of the Shire and not CALM. Note that the outcrops at the base of the Point D'Entrecasteaux cliffs are difficult to access and possibly quite dangerous	Noted. There are granulite outcrops also within the parks, even though they may be inaccessible	1(e)
1	13.3	The validity of the Windy Harbour granulites outcrops being recognized as a geoheritage site is being questioned	Noted	2(b)
1	13.3	An excellent visual example for sea level changes of the recent past are the submerged grass tree stumps in the Broke Inlet estuary. These stumps can easily be seen when wading through shallow water, but occasionally the stumps emerge when the water level is exceptionally low in the estuary. These stumps are of great educational value in that the effects of fishing and falling sea levels during the Ice Age can be explained and understood. Include the submerged grass tree stumps in Appendix 3 - Geoheritage	If the stumps are still partially submerged at the lowest tide then they will be below the low water mark and outside of the plan area as Broke Inlet is not in the planning area	2(c)
1	13.3	Whereas the Basalt formations at Black Point are outstanding examples of ancient geological activities, the grindstone tubes are a fascinating example of present-day geological activity. "Geology in Action" could be the educational theme. It is a spectacular experience to watch the grindstones grinding along with each wave action and deepening the tubes that are several metres above the sea floor as the years go by. The nearby exposed tubes that are several metres above the sea floor provide vivid evidence of the gradual rising of our continent due to tectonic pressures. When watching the grinding motions of the stones in their tubes, one can almost see in one's mind how the continent is rising from minute to minute. These grindstone tubes are a reason in themselves why the D'Entrecasteaux National Park should be included in the Walpole Wilderness Area and eventually in the Walpole World Heritage Area. Include the grindstone tubes in Appendix 3 - Geoheritage	Noted, however no references could be found that mention these	2(f)
1	13	The Key Points and Objectives refer to maintaining the "geodiversity and geoprocesses of the parks and protect sites of known geoheritage". These concepts are difficult to rationalise and the applications in the report are unclear. Change to: The objective is to not unnecessarily interfere with surficial geological processes, and to manage and improve interpretation of sites of geological significance	The objective is appropriate and the strategies outline how the objective can be achieved. Interpretation is mainly dealt with in section 41	2(d)
1	13	The concept of geodiversity is commonly related to the apparently equivalent term of biodiversity that is the recognition of diverse floras and faunas within defined areas of sites. Such a transfer of this biologically-oriented term into the geosciences can lead to illogical conclusions. The Geological Society of Australia's Heritage Committee reviewed this term several years ago and expressed concern at its persistent use	Geodiversity will be defined in the plan	2(d)
1	13	The concept of geoprocesses is extremely difficult for humans to grasp in a lifetime because they operate on geological time frames, commonly of tens to hundreds of millennia as the shortest, and more typically in mega-annum periods. To maintain these processes is normally beyond human ability, with a few notable exceptions. These exceptions are modern surficial features, such as dunes, watercourses and the interactions between surficial hydrology and landforms	Geodiversity includes geoprocesses, so term will be removed anyway	1(e)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
2	13	Strategy 1: strongly agree	Noted	2(a)
1	13	Amend strategy 2. Consulting with the Director of the Geological Survey of WA prior to conducting management works at identified State Geoheritage Sites	Noted	1(d)
2	13	Strategy 3: Strongly agree	Noted	2(a)
1	13	While my dictionary doesn't recognise any of these geo- words, the draft says this objective will be achieved by protecting caves, fossil sites and sand dunes - all coastal issues. There is no mention of high forest issues	Geoheritage values encompass coastal and forest geology of significance. The list contains examples, not a definitive action list. Strategies 1, 2, 4, 5 and 6 also relate equally through the plan area	2(d)
1	13	Amend strategy 3. Recognising that coastal dune formation and migration is a natural process, and that activities that exacerbate or negate this process will require careful consideration in the planning stages of any works	Strategy as written is appropriate because it is about managing the activities themselves rather than the planning aspect	2(d)
1	13	The issue with documenting addition important geological sites and utilizing the information for interpretive sites is supported. Note that this should be in collaboration with the senior Government geologist, the Director of the Geological Survey of WA. Amend strategy 4. Consult with the Director of the Geological Survey in compiling interpretive geological information in the Parks	It is not necessary that the Director of the Geological Survey be consulted in developing appropriate interpretation, however collaboration may be appropriate in some cases	1(d)
1	13	Reference to "Only allowing geo-scientific research and collection consisting with protecting values of the parks" implies that this may not have occurred previously, and that point is rejected. It is difficult to consider how geological work would compromise park values. Also, geological work under the auspices of the Geological Survey legally do not require authority of the Park management, though it is highly improbable that any significant geological work would be conducted without consultation and agreement. Change action to "Supporting appropriate geological research in the parks"	The strategy is merely stating that geo-scientific research that is not consistent with protecting the parks' values will not be permitted. The final plan will be reworded to identify the power of the Geological Survey	1(e)
1	13	Important educational, reference and research geological sites need identifying and managing	This is not the purpose of a national park other than in the sense to educate park users, or protect the values of the parks. The existing actions reflect this	2(f)
	14	Landscape Quality		
1	14	Commend the authors for noting the exceptional scenic value of Lake Jasper and the need to protect the visual landscape. Landscape management should also note the negative impacts of noise, created by operations such as mining, on the enjoyment of the visual landscape	This section is about managing the 'visual' landscape	2(g)
2	14	Strategy 1: Agree. This should be done in consultation with stakeholders, who may have a different perception from the park managers	Assessing visual landscape requires specific skills and it is not feasible to consult with stakeholders on all management activities and developments	2(e)
1	14	"The Objective is to protect and enhance the parks' visual landscape qualities". The draft says the objective will be achieved by amending fire management plans away from what should be their primary functions of reducing risks and regenerating trees. Hardly in the best interests of biodiversity in high forest areas	Managing visual impacts is not seen as mutually exclusive from protection of biodiversity	2(e), 2(f), 2(g)
2	14	Strategy 2: Strongly disagree. Fire management should not take negative scenic impacts into account. The protection of biodiversity is far more important than keeping the parks looking pretty. Change to "so as to protect biodiversity, regardless of their impact on scenery"	As above	2(e), 2(f), 2(g)
2	14	KPI 14.1: Since beauty is in the eye of the beholder, the perception of "changes to areas of high scenic quality" is subjective. The protection of biodiversity must be the overriding consideration, regardless of appearances	As above. National Parks are also important for landscape value and often have areas of outstanding scenic beauty which need to be protected. Scenic quality for the parks has been defined on Map 4, and follows the Visual Landscape Management protocol used by the Department	2(e), 2(f), 2(g)
	15	Soil and Catchment Protection		
	15.1	Hydrology		
	15.1.2	Estuaries		
1	15.1.2	I note that within the Parks system there is no significant inlet or estuary included. It is well known that estuaries are an important part of many ecosystems and can provide a habitat for a surprisingly high range of biota. An indication of the value of estuaries to biodiversity conservation is shown in Map 6 which shows a high level of biodiversity around the Broke Inlet, broken up by roads and farms. I would suggest eventual inclusion of the Broke Inlet in the Parks	Broke Inlet is a proposed marine park. Statements about this are included in section 3 Management Plan Area	2(c)
	15.1.3	Lakes and Wetlands		

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	15.1.3	There are many lakes fully protected in the park, Maringup, Quitjup, Wilson, Smith, Samuel Florence, Doggerup and many other smaller lakes	Noted	2(b)
	15.1.5	Groundwater		
1	15.1.5	No further extraction of water from the Yarragadee aquifer should be allowed until full and long term studies have been conducted on the impacts of this on the hydrology both independently and taking into account the decrease in local rainfall due to climate change	Extraction of water is not the responsibility of the Department and in 2007, the State government decided not to proceed with the proposal to extract larger quantities of water from the Yarragadee groundwater aquifer	2(c)
4	15.1.5	The current and potential impacts on the parks of extraction from the Yarragadee aquifer must be fully assessed before any further extraction is allowed (p28)	As above	2(c)
1	15.1.5	Relevant recommendation from Shire of Manjimup to DPI on the Draft Augusta Walpole Coastal Strategy includes: progressively improve drainage at Windy Harbour	Noted	2(c)
1	15.1.5	Among other statements, the current draft AWCS includes the following information in relation to Windy Harbour: "A much greater constraint to the future of Windy Harbour is the provision of drinking water and the disposal of wastewater. Drinking water is supplied from a borefield located within the D'Entrecasteaux National Park. There is concern that the draw down on the water table may affect the vegetation within the park. This issue needs to be resolved urgently. The safe disposal of wastewater is also a critical issue. Currently, with the disposal via septic systems there is an unknown impact on groundwater. This needs to be quantified. The establishment of a baseline will then help guide decision making. Until the disposal of wastewater is resolved to the satisfaction of the Health Dept and is within safe limits for human and environmental health standards, no further approvals of new cottages should be allowed."	The Department is liaising with the Shire of Manjimup to ensure water extraction is sustainable with minimal impact on the park values. Strategy 3 would include the issue of waste water disposal in the Windy Harbour Reserve which is the responsibility of the Shire of Manjimup	1(d)
1	15.1.5	Is it known how much water Windy Harbour uses and what impact that has on the water body (how big is the water body?)	As above. This should include base line studies and monitoring of water use, text will clarify this in sections 15 and 40	1(e)
	15.3	Water Quality		
1	15.3	Last sentence states that mineral sand mining poses a threat to the Jasper Wetland System. This statement needs amending. Jangardup mine operated for 8 years and has now closed. If there was a threat from that operation, what matters can be cited now as a result? The Jangardup South deposit, also in this system may be proposed for mining in the future, and if any risks were proven from the operation of Jangardup, its mining is unlikely to be approved. If mining does proceed, the consequential conservation benefit of moving the boundary of adjacent farmland back from 250m to 2.6km from the shore of Lake Jasper requires acknowledgement as a major potential benefit from mining. Remove the reference to the mining constituting a threat unless the potential benefit through the mining is also acknowledged. Acknowledge the potential benefits from the mining conservation offset	The plan referring to potential threats, and according to several wetland studies of Lake Jasper, mining is a threat (Jaensch 1992, Jaensch 1992b, Jaensch 1992c, Jaensch 1993)	2(e)
	15.5	Acid Sulfate Soils		
1	15.5	p27. Sulphate, not US spelling	Noted. Plan will be changed to correct spelling	1(e)
1	15.5	There is a reference to "minerals" and to "large quantities" of sulphuric acid. Pyrite is essentially the only sulphide mineral reported from these reduced soils. The quantities require qualification. Typical concentrations of pyrite are on the trace to minor accessory levels and there is insufficient to produce large quantities of sulphuric acid. However, it is likely the draft is referring to the potential for large areas of pyritic soils to be present in the back-dune and other swamps of the parks, and oxidation over large areas would create large quantities of acid. However, management requirements because the area is national park should preclude groundwater changes over extensive areas that could lead to exposure of the pyrite to atmospheric oxygen, and it is considered that the issues may be overemphasized as a potential problem. Suggest you refer to mineral only and qualify the reference to large quantities as being in relation to large areas	Final plan will be amended. Note that the planning area includes a 5(g) reserve which does not have the same protection as a national park and there is the potential for mining activity to produce acid sulphate soils	1(e)
2	15	Key Point 1: Strongly disagree. The parks are not a potential source of public water supply. Either we are serious about protecting the biodiversity values of the parks, or we are not. Provision of water for human use from the parks should not even be considered	The purpose of D'Entrecasteaux National Park includes water	2(c)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	15	The stated objective is to protect and conserve the quality and quantity of soil and water within the parks, particularly the wetlands systems, the rivers and estuaries and the coastline. This is to be achieved by expansion of and focussing on, the coastal areas and consulting with other government agencies. No details are provided for soil and catchment protection of the forested areas of the Shannon National Park. This is a curious omission, as the original reason for reserving the Shannon was to "preserve" an entire river catchment	Strategies 1 through to 8 refer to both parks	2(d)
1	15	The draft says this will be achieved by expansion of, and focussing on, the coastal areas and consulting with other government agencies. There is no mention of any action in the forested areas of the Shannon National Park	As above	2(d)
2	15	Strategy 1. Any proposed development not in accordance with the management plan must go through the legal process for amendments in the Conservation and Land Management Act	Strategy 1 refers to the EPA and its environmental impact assessment process, not the management planning process	2(g)
2	15	Strategy 2. These agencies should not be involved in land uses provided for within the parks	The strategy refers to adjacent to the parks or within the catchment of the parks	2(a)
2	15	Strategy 3. Agree, but note that there may be disagreement about what constitutes 'significantly'	Noted, however current wording is preferred	2(d)
3	15	Strategy 3. Water is increasingly being drawn from aquifers on agricultural land near the western section of the D'Entrecasteaux National Park for various farming uses. The Yarragadee (lowest aquifer) is the usual source. Water Corp's Report No. 5 of the SW Yarragadee Water Supply Development Series, entitled 'Hydrology of the Eastern Scott Coastal Plain' by Rockwater P/L indicates a variable potential for groundwater lowering due to watertable drawdown in the Yarragadee formation in the region, with medium to high impacts near Lake Quitjup (10km west of Lake Jasper, which itself is seen as a low to medium risk). Increased lowering and any consequent ecological harm is likely to occur during summer and autumn. Groundwater proposals need to be carefully scrutinised with respect to likely impacts, including effects in the national park. Ongoing monitoring of drawdowns, as recommended in the report, should occur. The likely impacts of increased extraction from the Yarragadee aquifer on D'Entrecasteaux National Park are strong arguments against any increase	Strategies 1 to 3 seek to protect from increased water developments	2(a)
3	15	Strategy 3. the proposed Jangardup South mineral sand mine, situated in excised national park at Lake Jasper, would require huge quantities of groundwater and the impact of this on surrounding ecosystems might be disastrous. The harm would result from water table drawdown with associated water stress in ecologies, and acidification of (acid) soils and water due to aeration	This is covered in section 32 Mining as well as the strategies in this section	2(a)
4+27	15	With respect to the D'Entrecasteaux NP careful monitoring of water acidity should be implemented to show if any similar trend towards increasing acidity may be being introduced by groundwater abstraction and climatic drying	Noted	2(a)
1	15	I fully support proposals including acid sulphate soils being mapped and properly managed	Noted	2(a)
1	15	A study of the acid sulphate soils within these regions by the relevant departments to commence a management strategy is essential	Refer to strategy 9	2(a)
1+27	15	More research into the causes of acidity is needed, as is better mapping of the acid soils in the region	Noted. Research on the causes of acidity do not need to occur in the parks. Strategy 9 addresses mapping	2(a)
4	15	Support mapping acid sulphate soils and taking them into account in planning and management	Noted	2(a)
4+27	15	However, the biggest risk of large-scale acidification would be the Jangardup South mine. Cable Sands have said that acid soils concentrations there are below potentially toxic levels and that the proposed mining method (sub-laying) will prevent aeration. In order to assess the real danger to Lake Jasper ecosystems these claims should be peer reviewed by independent experts in mining and acid soils prior to mining being considered	This would be part of the EPA assessment	2(c)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
4+27	15	Strategy 9. Agree. Mapping should be carried out as a matter of urgency. Acid sulfate soils occur in varying concentrations across the Scott Coastal Plain, including in D'Entrecasteaux National Park. As the defunct Beenup mine showed, acidification can quickly reach harmful levels when soils are disturbed. It is worrying that increasing acidity is being measured at Scott River in line with the decrease in annual rainfall in the area. Acid soils are thought to play a part through rainfall decline, aquifer abstractions, changes in land use and drainage, and drawdown from bluegum plantations. More research into the causes of acidity is needed, as is better mapping of the acid soils in the region. Falling water table could result in drainage which can have a severe effect on biodiversity through the pH changes themselves, and through increased solubilisation of arsenic, cadmium and other heavy metals	Noted	2(a)
2+4	15	Supports extending the D'Entrecasteaux NP Boundaries to the low water mark	Noted	2(a)
	16	Native Plants and Plant Communities		
1	16	Photos of the mentioned flora would be useful	Agreed, and future management plans may include more photos in general. You can view photos of the flora mentioned in the draft online at http://florabase.dec.wa.gov.au/	2(d)
	16.2	Plant Communities		
1	16.2	Reference in 2nd para is to karri being supported by laterite soils. CALM's anecdotal correlations is of karri with thicker silty soils, and that karri does not grow in laterite, in contrast to the marri and jarrah. Confirm with foresters that karri prefers thicker silty soils and if so correct statement	Christensen (1992) states " <i>high open forests are typically karri, or karri and marri less frequently mixed with jarrah and karri. Near Walpole yellow tingle, red tingle or Rate's tingle may be present. High open forests have developed on the most fertile soils within the area where annual rainfall is greater than 1100 mm. The open forest is generally composed of jarrah or jarrah - marri mixtures, with yarri, flooded gum and yate occasionally occurring in small patches by themselves. Open forests grow on lateritic and podzolic soils and in drier regions. Karri grows in a variety of soils developed over granite, granite-gneiss, limestone, laterites and sand. Karri attains its best development as a tree on red earths in the high rainfall central parts of its range in the vicinity of Pemberton.</i> "	2(g)
1	16.2	It might pay to be a bit more accurate here "forms an impenetrable thicket more than 2 metres high, particularly after being burnt". How long after being burnt? No impenetrable thickets after two years, no impenetrable thickets by twenty years. Maybe insert "particularly from around four to fourteen years after being burnt"	Noted	1(e)
1	16	p31, Key Points: 4th dot point - the reference to increased risk of fire ignition as a result of wildflower picking is not supported by past experience	This point is supported by past experience from the Frankland District. There have been a number of incidences of "wildfire" in wildflower picking areas that have become unproductive as a result of the age of the vegetation. The police have investigated at least 2 cases over the past 5 years. The body of the text will be clarified	1(e)
1	16	The draft says the objective will be achieved by identifying threats, providing information, banning collection of forest products and encouraging outside organisations to conduct vegetation surveys. There is no mention of replacing the harvested karri trees in the Shannon National Park	This will be amended in section 37 Rehabilitation	1(e)
2	16	Objective: delete "structural". It is not just the structural diversity that should be protected and conserved. It is all diversity	Noted	1(e)
1	16	Threatening processes mentioned in the first action to achieve the objectives of this section should include mining	The list is only "such as" and is not exhaustive. The list could include other threatening processes from Part F, however only those from Part C have been chosen to show how the sections fit within Part C	2(d)
1	16	p31, Key Points: Strategy 1: 'Fire' per se, is not a threatening process. Inappropriate fire regimes is a threatening process	Noted	1(e)
2	16	Strategy 3. Delete "Continuing to apply" replace with "Applying". Apart from vascular plants, birds and mammals, far too little is known about the biota or the impact of various fire regimes on the biota for CALM to claim that it is applying fire for biodiversity conservation. There is a wealth of scientific evidence that too frequent fires have a disastrous effect on many species of flora and fauna. There is also evidence that CALM's burning is too frequent for biodiversity conservation	There is no evidence suggesting that too frequent fire is having a "disastrous effect" on biodiversity. All research indicating detrimental effect of fire is based on post wildfire data collection, which is a question of fire intensity. The Department has an adaptive management policy that involves the application of fire according to our current knowledge. As that changes, so too will the fire application if appropriate	2(d)
1	16	Applaud the proactive approach to managing firewood and wildflower collection by promoting alternative sites	Noted	2(a)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	16	Detailed studies of the flora and vegetation communities should be made a priority, particularly in areas under immediate threat from mining	Noted. Please refer to strategy 6. Also flora surveys are required for proposed mining areas, especially for threatened flora species	2(a), 2(c), 2(d)
1+27	16	The Commission should require as a priority detailed studies of the flora and vegetation communities, particularly in areas under immediate threat from mining	As above	2(a), 2(c), 2(d)
1	16	Supports the prohibition of wildflower picking and seed collection within the Parks	Noted	2(a)
1	16	I also support the continued banning of picking wildflowers	Noted	2(a)
4	16	Support continuing to prohibit the removal of wildflowers from the parks	Noted	2(a)
1	16	I would like to see prohibiting the removal of wildflowers	Noted	2(a)
	17	Native Animals and Habitats		
1	17.1	I note that according to the DMP, critical weight range mammals are in a state of severe decline in the Parks. I would suggest that this is a matter of some urgency, given that other mammal populations in Australia are also declining steadily. The protection of critical weight range mammals is integral to the protection of the ecosystems of the Parks as a whole	Noted	2(a)
	17.1	Mammals		
1	17.1	I would recommend that remnant mammal populations be mapped, and those areas under greatest threat be the main focus of baiting and other control programs	Strategies to protect and conserve mammal populations are stated in this section and section 20	2(a)
1	17.1	I note that according to the DMP, critical weight range mammals are in a state of severe decline in the Parks. I would suggest that this is a matter of some urgency, given that other mammal populations in Australia are also declining steadily. The protection of critical weight range mammals is integral to the protection of the ecosystems of the Parks as a whole	Noted	2(a)
1	17.1	p32 para 5. Last sentence is too sweeping when applied to the Park	The sentence will be clarified	1(e)
1	17.1	p32, Para5: Last sentence: Is it reasonable to state or infer that any or all of these causes are/were operating in the parks? It is a very broad generalisation in the context of the management plan.	As above	1(e)
1	17.1	p32, Para5: Is there documented evidence that these species ever occurred in the Park? Or is it an opinion that they could have occurred here?	The three listed presumed locally extinct species occur in the sub fossil record	2(b)
1	17.1	p32, Para 5: Gilberts potoroo is <i>Potorous gilbertii</i>	Christensen (1992) uses <i>Potorous tridactylus gilbertii</i>	1(e)
1	17.1	Potoroo <i>tridactylus</i> should be changed to <i>Potorous gilbertii</i>	As above	1(e)
2	17.1	The 2nd para highlights that "older" vegetation ages are necessary to maintain biodiversity. Maintaining vegetation at young, homogenous ages will be detrimental to biodiversity conservation	Whilst the older aged vegetation is necessary to provide fauna habitat, younger vegetation can also play an important part in maintaining biodiversity by providing new foraging ground, flora regeneration etc. Hence vegetation age heterogeneity is one aim in fire management	2(a), 2(d)
	17.2	Birds		
1	17.2	You need to be wary about extrapolating finding from a national study to the parks. The great cormorant and black swan like dams and lakes. The white-necked heron tends to be an irruptive species in SW Aust, responding to drought in the inland	The comment made in the plan simply indicates that nationally the park is contributing to the maintenance of the species listed, which it is	2(d)
1	17.2	P33 Also cite and discuss. Abbott, I. 1999. The avifauna of the forests of southwest Western Australia: Changes in species composition, distribution and abundance following anthropogenic disturbance. CALMScience Supplement No. 5: 1-175. Corrigenda. Conservation Science Western Australia 5: 136 (2004)	Reference will be included and appropriate information included	1(e)
1	17.2	p33. Also cite and discuss: Abbot, I. 1998 Avifauna of the Irwin Inlet-Mt Frankland region of southwest Western Australia, 1912-1913 CALMScience 2: 373-386	Relevance to parks is not clear as observations can not be tied into specific locations within the parks	2(d)
	17.5	Fish		
1	17.5	The statement "Four exotic freshwater species...occur in the parks...and although there is limited information on the impacts of introduced species in south-western Australia, there have been deleterious effects caused by same or comparable species in eastern Australia". Is somewhat misleading, as each species must be considered separately. As an example, Redfin perch are very difficult to control and prolific breeders, as well as voracious predators, whereas trout in WA are poor breeders, easy to control and not prolific. (Fisheries Management Paper N156)	The statement is clear and is further elaborated on in section 20	2(d)
	17.6	Invertebrates		

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	17.6	Margarodidae: This animal was not listed in native fauna section. I have a thriving population that visits from time to time. No-one else seems to have them along the river	Margarodidae is a family of scale insects / mealy bugs. These insects are not in need of any special protection. There is only one Western Australian species, which is endemic to Australia. The WA species is <i>Auloicerya acaciae</i> . More information can be obtained from the Department's Science Division at Manjimup. The native fauna listings in Appendix 5 do not include any invertebrates	2(b)
1	17	Action 1, p35. "Protecting fauna habitats from adverse changes to water quality and quantity..." I strongly agree with this statement, while acknowledging that most of the Donnelly and Warren catchments are outside the parks, and this is where adverse practices (fertilisers, dams, silt load etc) occur. Only the Shannon is wholly within the parks	Noted	2(a)
1	17	p35. Strategy 2: Delete 'maintain' - we can 'promote' but only divine intervention can 'maintain'	Maintain is an appropriate word in the context used	2(d)
1	17	P35, Strategy 2: Implementing appropriate fire regimes to maintain or promote biodiversity within the parks (see Section 22 Fire). "Appropriate" fire regimes are not listed in "Section 22 Fire". This is a major shortfall	The listing of all "appropriate" fire management practices is too specific for this document and would limit the use of new or changing management practices supported through ongoing research	2(d)
1	17	Upgrade the actions from encouraging research into fauna populations to a commitment to undertake research, In particular: Conduct detailed ongoing studies of the waterbird use of the nationally important wetlands throughout the year; Commit to undertake detailed fauna studies; Commit to studies of the invertebrate community, where current information is clearly inadequate	The wording of strategy 4 is sufficient. Fauna research will be dependent on priorities and resources. The projects listed are worthwhile, but in the broader context of management requirements may not come out as highest priority. For example, use of the wetlands by waterbirds - if we know the wetlands are important and we are protecting the wader habitat, the monitoring may not be as important as research into a species/ habitat that is under immediate threat and for which we have no information	2(a), 2(d)
27	17	The Commission should undertake detailed fauna studies, particularly of waterbirds in the nationally important wetlands	As above	2(a), 2(d)
1	17	Action 4, p 35. "Continuing existing monitoring of fauna populations and encouraging further research in the parks..." I strongly agree with this objective, as only research will show if trout are a threat to native fish within the parks"	Noted	2(a)
1	17	The draft says the objective will be achieved by continued monitoring, particularly of invertebrates, modifying fire control and "Working with other agencies and private industry to ensure that extractive industries within or adjacent to the parks do cause adverse environmental impacts". [I hope it is a typographical error]. Apart from keeping introduced bees and timber harvesting [now forever banned], the only prospects of future industry operations are in the coastal areas of the D'Entrecasteaux National Park	Strategy 7 has been changed to include word "not"	1(e)
1	17	p35 item 7 "Working with other agencies and private industry to ensure that extractive industries within or adjacent to the parks do cause adverse environmental impacts" must be an unintended error	As above	1(e)
2	17	Strategy 7. Add "not" before "cause"	As above	1(e)
2	17	Strategy 7. There should be no extractive industries within the parks	Noted	2(c)
	18	Species and Communities of Conservation Significance		
	18.1	Fauna		
	18.1.1	Threatened and Other Specially Protected Fauna		
1	18.1.1	Although I have known that Quokkas reside in the Northcliffe area, I was surprised to read that there are populations within the Park, I would like to see these areas identified and protected more. Fire and foxes must not decline these populations, I would also like to see more studies and more protection for our native animals especially in state forest areas	Noted. The strategies outlined in this and other sections of the plan provide effective protection of quokka	2(a)
1	18.1	Quokkas occur in or adjacent to creeklines gullies and sedgelands that may be present in either forest, woodland or coastal heath. In the areas of these national parks they are chiefly associated with <i>Empodisma gracillimum</i> , <i>Lepidosperma tetraquetrum</i> , <i>Homolasperrum firmum</i> and <i>Callistachys lanceolata</i>	Noted, sedgelands will be added to the paragraph	1(e)
2	18.1.1	The key here is that even though the Quokka prefers to feed on relatively young vegetation, it shelters in older thickets. Again, a mix of vegetation ages is required. The chuditch, Australian bitter and malleefowl examples from the DMP further highlight this point (p37)	Noted. This is provided for in strategy 6 and Section 22.2 Fire Ecology	2(a)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	18.1.1	Wetlands International supports the attention given to Australasian Bittern (a globally endangered species: IUCN Red List 2004)	Noted	2(a)
1	18.1.1	Larger numbers of Australasian Bitterns are likely to be found in the thicket/sedge swamps of the Park if intensive and comprehensive surveys are conducted	Noted	1(e)
1	18.1.1	p37, para 3. Is there any record of Gilbert's potoroo ever existing west of Albany. If not, comment, on its likely historical presence is mere conjecture and to refer to it as 'locally extinct' a fabrication	P32 1st paragraph under section 17.2 Mammals provides an appropriate reference for the previous presence of Gilbert's potoroo	2(d)
1	18.1.1	p37, Para5. Is it reasonable to refer to Malleefowl as being a component of the biota in the parks? To my knowledge (and I stand to be corrected) the nearest sighting of malleefowl is Tone River. The information referred to concerning threats to malleefowl, and in particular the litter accumulation information, are in relation to the mallee heaths and to refer to them in this context is inappropriate and out of context.	Malleefowl have been sighted at several locations within the parks. The references to litter accumulation rates do appear to be related to mallee heaths and not the more productive habitats found within the parks. The statement regarding the need for long unburnt country and litter accumulation rates should be removed from the plan and replaced with a statement outlining the lack of knowledge of malleefowl habitat structure requirements within the vegetation types of the parks and a need for further research into litter accumulation rates. Areas containing high litter loads are still required by malleefowl to build mounds	1(e)
1	18.1.1	p37. See Abbott 1999: 14-16. The Benshemesh 1999 data quoted are irrelevant, as they come from mallee. Litter fall in karri and jarrah forests is much faster than 15 years!	As above	1(e)
1	18.1.1	It is highly likely given the vegetation type (<i>Agonis flexuosa</i>) existing in coastal areas of the park, that the Ringtail possum (<i>Pseudocheirus occidentalis</i>) would be found. It is classified as a Declared Rare and Endangered species and if identified within park boundaries, should be listed in this section	It is agreed that it is highly likely that ringtails occur within the parks. The District has sighting records for ringtails in forested areas adjacent to the parks but none recorded within. There is suitable habitat for ringtail possums within the parks. The final plan will be amended to reflect this	1(e)
	18.1.2	Possible Reintroductions of Threatened Fauna		
1	18.1.2	p38, Para5. The habitat required by the western ground parrot and western bristlebird depends on vegetation structure (dense). They require dense vegetation not necessarily 'long unburnt' vegetation. Time since fire is only an index to this structure type. The fire intervals referred to are only relevant in the context of their existing range in the dry heaths east of Albany. Adequate structure may be achievable in much shorter inter fire periods in the more mesic environs of the parks	The structure and composition of the vegetation is important, not necessarily the seral age. The fuel ages and fire intervals referred to in the plan do refer to bird habitat to the east of Albany. Post fire recovery of habitats found within the parks has not been adequately studied and may well differ from that of the birds' habitat to the east of Albany	1(e)
	18.1.3	Priority Fauna		
2	18.1.3	P38. Threats for priority fauna listed in the DMP as "altered fire regimes"	Noted	2(a)
1	18.1.3	We support the temporary closure of sections of the beach (above high water mark) where it is necessary to protect breeding birds, while at the same time maintaining vehicle access to the beach	Noted, however hooded plovers for example rely on the tidal areas of the beach	2(e)
1	18.1.3	Concur with the remarks re salamanderfish [p39]	Noted	2(a)
1	18.1.3	Larger numbers Little Bitterns are likely to be found in the thicket/sedge swamps of the Park if intensive and comprehensive surveys are conducted	Noted	1(e)
1	18.1.3	It may be worth noting (p38) that the thicket/sedge swamps in the park and adjacent in Gingilup Swamps NR probably constitute one of the most extensive areas of habitat in WA for the Little Bittern which remains in good condition	Noted. This information will be added either in this section or the communities section as a personal communication	1(e)
	18.1.5	Relictual Fauna		
1	18.1.5	Relictual Fauna. Again, "Section 22 Fire" does not provide specific solutions, other than that only less than 5% of fire sensitive vegetation communities should be burned in any of the burns in the proposed conceptual fire regime model (p.69). This does not provide a useful solution	Fire management is a continually evolving practice that constantly changes as ongoing research provides new insight on the effects of fire on the environment. The listing of all "appropriate" fire management practices is too specific for this document and would limit the use of new or changing management practices supported through ongoing research	2(c)
1	18.1.5	p40. Reference to frequent fire as an inimical factor is ill-founded: frequent fires should create an intricate mosaic of burnt and unburnt patches that provide long-term continuity of refuges (though not necessarily always in the same place). A regime of infrequent fires will burn larger areas more uniformly, leaving fewer refuges to allow recolonisation of the landscape. This is fire logic	With respect to relictual fauna, Hopper's premise that these species remain in the refuges because there has been infrequent fire, for example winter wet wetlands and granite outcrops. In these cases, the application of an appropriate fire regime as described section 22 will address the concerns raised	2(d)
	18.1.6	International Conventions		
1	18.1.6	Appendix 5 lists only one species of migratory shorebird but it is likely that at least several others occur at times around the lake margins when sand/mud is exposed and especially at Broke Inlet. Thus the number of JAMBA/CAMBA species is likely to be somewhat higher than indicated in the plan	Appendix 5 lists 6 species either under Jamba, Camba or the Bonn Convention. The crested tern has also been identified as a Jamba species. The Appendix is only a reflection of survey effort and it is acknowledged that the actual species occurrence would be higher	2(a), 2(b), 2(g)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
	18.2	Flora		
	18.2.1	Rare and Priority Flora		
1	18.2.1	P40. "A priority flora list is maintained as a mechanism to highlight flora of special conservation interest and encourage appropriate management activities areas such as ... prescribed burning (see Section 22 Fire- Fire Ecology)"... Again, "Section 22 Fire" does not provide specific solutions	Fire management is a continually evolving practice that constantly changes as ongoing research provides new insight on the effects of fire on the environment. The listing of all "appropriate" fire management practices is too specific for this document and would limit the use of new or changing management practices supported through ongoing research	2(c)
1	18.2.1	It would be more correct to say that granite banksia is killed by fire if it is defoliated or experiences total canopy scorch. These plants are not necessarily killed by low to moderate intensity fire although they are almost always killed by severe fire but not all fires are lethal fires. The suggestion that it requires to be protected from fire for at least 20 years! Is this talking about fire interval on the outcrop where the species occurs or fire interval in the surrounding landscape? This may need clarification in the management plan. If it is talking about fire in the surrounding landscape then there is a contradiction here. One of the populations in D'Entrecasteaux NP (Woolbales) is currently in a critical condition as a consequence of being allowed to senesce, apparently the result of unplanned long term fire exclusion. See "Rare Flora Reports 2005 and previous", and associated field notes on this population. (Frankland District) unpublished observations. Perhaps it would be more accurate to say that this species requires particular fire management	The text is referring to the population. The final plan will clarify the fire regime require for surrounding landscapes such as those around granite outcrops. References and Environment Protection and Biodiversity Conservation Act listing state the populations require 20 years to provide adequate seed storage http://www.environment.gov.au/cgi-bin/sprat/public/publicspecies.pl?taxon_id=8333 . The Department is continuing to conduct research on the effect of fire on the granite banksia which may lead to further adaptive management	1(e)
1	18.2.1	P40 "The Granite banksia is killed by fire and regenerates from seed. It has a long juvenile period and should be protected from fire for > 20 years". This highlights that long fire intervals are required. The 5% rule suggested in conceptual model on p69 does not fully cater for this particular plant. It must also be recognized that it is not desirable to burn this plant on a 20 year rotation. Much longer periods between fires are required for this plant and the vegetation community of which this plant is a part	The text of the final plan will be clarified regarding fire management for granite outcrops and life histories of fire sensitive flora	1(e)
1	18.2.1	P40 Knowledge in relation to fire regimes and plant regeneration of the Northcliffe kennedia is still limited. "Fire kills this species and stimulates germination of the seeds in the seedbank. The populations within the parks require further study and regular monitoring to ensure that several seasons of seed production occur between fires". This highlights that knowledge in relation to appropriate fire regimes is still limited and that it is most likely that a wide range of fire regimes existed across the different vegetation communities	Noted	2(b)
1	18.2.1	P41 "The globular mignonette orchid grows in peaty soils in seasonally wet swamps... These orchids only flower after hot summer fires.... Further surveys following summer fires in this area and similar habitats nearby could reveal other populations". This suggests that this plant evolved with a fire regime which included hot summer fires. This reinforces the concept of a wide range of fire regimes	The Department's policy is that diversity of fire equates to biological diversity. Different species respond differently to fire. The fire section of the draft plan provides opportunities to use adaptive management principles to develop a range of fire regimes with the parks	2(a)
	18.2.3	Endemic, Disjunct and Relictual Flora		
1	18.2.3	p41, para 7. ...or catastrophic events such as unplanned fire. Fire, per se, is not a 'catastrophic event'. It is a natural ecosystem driver in the same context as rain. It should not be labelled with adjectives that provide connotations of 'good' or 'bad'	Noted	1(e)
1	18.3.1	p42 "These areas that are centres for endemic, disjunct and relictual species within the parks should be specially protected through appropriate park management and the impacts of fire should be analysed". Again, "Section 22 Fire" does not provide specific solutions in this area	Fire management is a continually evolving practice that constantly changes as ongoing research provides new insight on the effects of fire on the environment. The listing of all "appropriate" fire management practices is too specific for this document and would limit the use of new or changing management practices supported through ongoing research	2(c)
	18.3	Communities		
	18.3.1	Threatened Ecological Communities		
1	18.3.1	Pig damage to Reedia spathacea colonies is a major threat to this species. The fencing of Reedia plots has been successful against pig damage, but the enclosures are not large enough, being only 100m by 30m i.e. 3000m ² whereas they should be at least 200m by 50m, i.e. 10,000m ² . I strongly advocate that as a preventative measure all Reedia colonies should have not centrally located enclosure of at least 1Ha in size, regardless whether or not pig damage has already occurred. Erect fencing enclosures at all Reedia closures	Partial fencing was originally implemented both to preserve the reedia from pigs and to study the effects they were having on the population. Complete fencing would be difficult due to prohibiting factors such as cost, the practicality of fencing within swampy areas and also protection of the fence from fire - however this strategy will still be considered if deemed necessary. A strategy will be added to specify monitoring of the populations is required and the possible implementation of protection measures such as fencing	1(d)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	18.3.1	It has been demonstrated through the implementation of exclusion areas that it is kangaroos that graze the Reedia not pigs. Pigs are not grazing animals. Also the damage that the pigs incur is primarily from digging around the base of the plants damaging the roots and ripping into the dead material at the base of unhealthy plants, not trampling. It is possible some seedlings may be trampled. In the interests of accuracy it might be better to simply say that "they are vulnerable to disturbance by feral pigs"	Noted	1(e)
1	18.3.1	P42-44 The DMP highlights that Reedia communities and wetlands are particularly vulnerable to ... severe and/or frequent fire	Noted	2(a)
1	18.3.1	Severe fires and frequent fires are mutually exclusive, it cannot be both. Frankland District fire records do not support the claim of vulnerability to frequent fire. However, those records when considered in conjunction with outcomes for Reedia do suggest that severe fires following longer fire intervals may negatively impact on the mature component of Reedia populations	Noted, however the community can be vulnerable to both even if they are mutually exclusive, for example a fire soon after a severe fire is a threat	2(g)
1	18.3.1	The decline in health of one population of Reedia Swamps was reported by myself in 1998. The first 21 years of recorded fire history indicate five fires at an average interval of 4.2 years in the area of that population. Since that time the area has experienced severe fires following average intervals of 7.6 years (the most recent following an interval of 9 years). It would appear that the two recent severe wildfires (1994 and 2003) coupled with feral pig activity, and possibly dry seasons, have led to a significant decline in the health of the mature senescent component of this population. If fire is implicated here, then it is infrequent, severe (lethal) fire, not frequent lower intensity (non lethal) fire. However, it is legitimate to suggest that the Reedia may require consideration during prescribed burning operations.	As above	2(g)
	18.3.2	Vegetation Complexes and Associations		
1	18.3.2	Undertake detailed studies to determine whether additional vegetation complexes within the park have special significance and initiate processes to have those communities listed under the relevant state and federal legislation	An action to reflect the further work that is required on the analysis of vegetation complexes as per p43 will be added	1(e)
	18.3.3	Wetlands		
1	18.3.3	The plan ascribes suitably high profile to the four wetland systems that are included in the Directory of Important Wetlands in Australia because they meet criteria for national importance	Noted	2(a)
1	18.3.3	Knowledge of the flora and fauna occurring in wetland areas is by no means complete especially with regard to the hard-to-access and hostile thicket/sedge swamps and to migratory shorebirds	Noted. Your comment will be included as a "pers. comm." and further surveys will be recommended	1(d)
1	18.3.3	We are particularly concerned that the values of Lake Jasper and its surrounds will be fully protected	Noted. The strategies outlined in this and other sections of the plan provide effective protection of Lake Jasper	2(a)
1	18.3.3	Immediately begin the processes to nominate the nationally important wetlands of the National Parks for inclusion in the List of Wetlands of International Importance (Ramsar Sites)	These wetlands are on the DIWA and as such are important candidate sites that can be included in future rounds of RAMSAR nominations. However, they are not the highest priority for listing because they are in conservation estate and are considered to have fewer threats than some others	2(a)
1	18.3.3	D'Entrecasteaux National Park should be proposed for inclusion on the Ramsar list of wetlands of international importance	As above	2(a)
1	18.3.3	It is urgent that the Commission begin the process to have the D'Entrecasteaux National Park included on the Ramsar list of wetlands	As above	2(a)
1	18.3.3	The Commission should move to have the important wetlands of the D'Entrecasteaux National Park included on the List of Wetlands of International Importance (Ramsar Sites)	As above	2(a)
27	18.3.3	The Commission should move to have the important wetlands of the D'Entrecasteaux National Park included on the List of Wetlands of International Importance (Ramsar Sites)	As above	2(a)
1	18.3.3	I note that Lake Jasper and the Gingilup Wetlands are being considered for nomination as wetlands of national significance and for inclusion in the Ramsar Register of Significant Wetlands. I would support any efforts to recognise the value of this wetlands system	As above. The draft plan does not state that the Jasper wetland system in particular is being considered for Ramsar. Please note that the draft plan states that the Gingilup-Jasper Wetland System is already listed as 'nationally important'	2(a)
1	18.3.3	I request that the DVD "Place of the Spirits" (sent with this submission) be included as part of this submission. The DVD covers areas of Indigenous, recreational and environmental concerns regarding the Jasper-Gingilup wetlands. DVD time 15 min	Noted	2(b)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	18.3.3	p44, para 1, 'frequent fire' is not a threat to the Gingilup-Jasper Wetland System. 'Large scale, high intensity fires' are. Use the term 'inappropriate fire regimes'	Reference states "frequent fire". The final plan will clarify in Section 22 what the appropriate fire management regimes of wetlands are	1(e)
1	18.3.3	p44, Para 2. 'frequent fire' is not a threat to the Doggerup Creek System. 'Large scale, high intensity fires' are. Use the term 'inappropriate fire regimes'	As above	1(e)
1	18.3.3	p44, Para 3. 'frequent fire' is not a threat to the Lake Maringup System. 'Large scale, high intensity fires' are. Use the term 'inappropriate fire regimes'	As above	1(e)
1	18.3.3	Re Maringup Lake, p 44, what future extraction of groundwater is planned?	There are no proposals known to the Department at this point in time (see section 40). The draft plan is pointing out that any future groundwater extraction could pose a threat to the conservation values of the lake	2(b)
1	18.3.3	That CALM encourage the State Government to strategically use a number of processes to implement its State Wetland Conservation Policy in this area particularly by advocating State purchase wetlands to become national parks. The boundaries of the 15 000 wetlands in this area were published by Water and Rivers Commission in 1997 and are available digitally. See Figures provided	Your recommendations have been passed onto the Planning Officer for the management plan that includes Gingilup Swamps Nature Reserve	2(c)
1	18.3.3	The <i>Reedia</i> swamps may also qualify for inclusion in the Directory	Noted	2(c)
	18.3.4	Granite Outcrops		
1	18.3.4	A high number of these species are obligate seeders (i.e. plants that are killed by fire and recruit only from seed) (see Section 22 Fire)... threats to these communities include... inappropriate fire regimes (see Section 22 Fire). Issues are again that longer fire free periods are required and that specific solutions are not included in "Section 22 Fire" in the DMP	Fire management is a continually evolving practice that constantly changes as ongoing research provides new insight on the effects of fire on the environment. The listing of all "appropriate" fire management practices is too specific for this document and would limit the use of new or changing management practices supported through ongoing research. Section 22 provides broad strategies for best practice in fire management	2(c)
1	18.3.4	p45, Para 3. ...obligate seeders (i.e. plants that recruit only from seed) is a more correct definition	Obligate seeders is a term that distinguishes fire sensitive species whose population recovery after fire is dependent on seed because all the adults have been killed, from those species whose adult plants tolerate the passage of fire. Text has been modified to be clearer however the reference to fire will be maintained	1(e)
1	18.3.4	"The granite outcrops" areas have virtually nil vegetation, except in soil-filled joints. The floristic importance of the monadnocks is the presence of the bare outcrops that cause run-off even from slight rainfall into the soils downslope of the outcrops, giving highly varied micro-environments and hence plant communities. Refer only to the monadnocks	It is disputed that granite outcrops have virtually nil vegetation	2(g)
	18.3.5	Old Growth Forest		
4	18.3.5	Forests must be allowed to renew themselves without 'management' if 'management' means logging and burning (p46)	There would be no logging of old growth forests. However fire may be used in management	2(e)
2	18.3.5	p46 If management means logging and burning, we strongly oppose such activities. Any proposal for 'managing' old growth forest within the parks must be subject to full public involvement	As above	2(e)
2	18	p46 below Table 2. "Disturbance and threats to the old growth forest, such as clearing and development". There should be no clearing or development in the parks	There will be development and clearing associated with recreational use, access and fire management. The text is referring to minimising these impacts on old growth forest	2(f)
1	18	p48. Strategies 10 and 11. Delete - these points are a repetition of Strategy 6.	Strategies 10 and 11 are about fire management regimes, whereas strategy 6 is about doing the work to identify plants that may be threatened and/or require special protection	2(d)
	19	Environmental Weeds		
1	19	Recent research has indicated a close relationship between weed species and changed soil. For example soil and leaf nutrient enhancement in a <i>Banksia</i> woodland resulting from invasion by <i>Ehrharta calycina</i> and <i>Pelargonium capitatum</i> (Judy Fisher UWA and Chair of WA Weeds Committee). This research should be of interest to those involved in management of national parks, particularly when determining impacts	Noted	2(b)
	19.1	Environmental Weed Management		
1	19.1	We believe that far greater emphasis and financial commitment is required to address the impacts of damaging agents such as this	The Department regards weed control as a high priority for resourcing	2(d)
1	19.1	I see this area to be of greatest importance. Without sufficient funds/resources to combat these problems the greatest damage to the park will be in this area. This is where government should focus most attention	As above	2(d)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	19.1	Sufficient funds should be allocated to help eradicate noxious weeds in the park as they are a major problem to the environment and are easily spread	As above	2(d)
1	19.1	It has been long recognised by the weeding community that the Department seriously lacks a committed policy or department dedicated to weed management	As above, however the Department also highly values community weeding action groups	2(b)
1	19.1	A training programme is required for staff and contractors involved in Park management	A training program is an operational matter and not necessary for inclusion in a management plan. The District has in place a training program for weed control, identification and safe chemical use park management staff	2(h)
1	19.1	These are clear instances of where early intervention could result in eradication of weedy species and prevent future expense and degradation. Many seemingly benign plants are recognised as 'sleeper' weeds that with time can become extremely invasive	Noted	2(b)
1	19.1	The Environmental Weed Strategy for Western Australia is in urgent need of review and updating. Especially in light of the State Weed Plan (2001) and the marked increase in community weed awareness and weed management expectations within the State. The Department should not rely on this out-dated Strategy when formulating this new management plan. The Strategy's priorities do not recognise the need for a rapid response strategy for new weed incursions and do not adequately address on-going training of staff and contractors involved in Park management. Neither does the strategy adequately address the Department's responsibilities to adjoining landholders and surrounding local governments	Until updated, the Strategy provides a useful guide for planners and managers for terrestrial reserves and is not used in isolation of local knowledge and priorities	2(c), 2(d)
1	19.1	Continue to participate in implementing the State Weed Plan and develop partnerships	Noted	2(c)
1	19.1	A Good Neighbour policy needs to be written into this management plan	The Department's Good Neighbour Policy was released in June 2007 and the plan has been changed to reflect this	1(e)
	19.2	Environmental Weeds within the Parks		
1	19.2	Having observed the weed situation at the old Shannon townsite for many years, I must say that the area is in my view a malignant floristic cancer in the centre of the Shannon National Park. Several years ago I discussed this with a CALM officer, who would have liked me to tackle the job of getting rid of all the weeds within the old Shannon townsite, but because of the sheer size of such an assignment I declined. Perhaps a task force should be appointed to make recommendations as to what should be done with the weed infestations in the long term, bearing in mind that the Shannon townsite area would be a much-visited focal point within the mooted Walpole World Heritage Area. A task force should investigate a long-term solution to the weed infestations	The Donnelly District recognises the need for management of weeds at this site and is currently in the process of developing a weed management plan for the old Shannon Townsite. The weed management plan for the area will be finalised and implemented over the life of this plan	1(e)
1	19.2	There is a conflict in approach where the Draft states that: 'eradication is rarely feasible' (draft p48 para4) but also notes that 'Many of these species have a very localised distribution'	This is not necessarily a contradiction. It depends on whether the management for the species is to control it or retain but monitor. For example, many of the species at Shannon Townsite which have remained mostly localised, could be eradicated but are being kept for historical and visual reasons as discussed in the draft plan. Other species targeted for removal may not be able to be eradicated. In addition, remote terrain, difficult access, protection of adjacent flora, chemical resistance, vigorous reproduction and multiple areas of locally distributed weeds can make eradication "rarely feasible"	2(g)
1	19.2	There is no mechanism within the Department to adequately respond to new weed incursions. A Rapid Response Strategy is needed to prevent new species incursions	The District monitors the incursion of new weed species as part of its normal land management activities. The final plan will be amended to include the development of a rapid response strategy for new incursions of highly invasive species	1(d)
1	19.2	We encourage the Department to create a 'condition' map for the parks giving vegetation quality and weed distribution	Noted. Refer to strategy 3. Mapping the extent of weed populations is an important component of developing control or containment strategies and to also develop works programs and budgets. This work has commenced in D'Entrecasteaux National Park and will continue over the life of the plan. The continual changing nature of vegetation within the parks due to factors such as drought, disease, fire, weed infestation etc means a "condition" map would not improve management actions or decision making in relation to threatening processes	2(a), 2(d)
1	19.2	Review Appendix 8 by National and State declarations and also group those species that can be targeted for eradication	The appendix is ordered as per the Western Australian rating which is sufficient	2(d)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	19.2	Green Mullein (<i>Verbascum virgatum</i>) is greatly increasing its spread within the old Shannon townsite. There is now a very large colony of <i>Verbascum</i> in the Periwinkle area with thousands of inflorescences each year, and spreading rapidly. For many years I have kept cutting off the inflorescences of the weed in an attempt to eradicate the species, but due to the very high seedbanks in the ground, this was unsuccessful. For 15 years I have also controlled <i>Verbascum</i> at the foot of the granite outcrop near the highway, but several plants are still emerging each year from the original seedbank, indicating a very long viability of <i>Verbascum</i> seeds. I have also eradicated <i>Verbascum</i> at the Main Roads metal dump site approximately 1km north of the Weld River Bridge. The occurrences of <i>Verbascum</i> at distant locations from the old Shannon townsite indicate that <i>Verbascum</i> has spread beyond the boundary of the old Shannon townsite. <i>Verbascum</i> should be included in Appendix 8 under weed rating 'moderate'. Eradicate <i>Verbascum</i> infestations occurring beyond the old Shannon townsite	Locations of <i>Verbascum</i> infestations have been noted by the District. <i>Verbascum virgatum</i> to be included in Appendix 8 - Environmental Weeds under the "low" category. This species has been rated as low against the 3 criteria of the EWS for WA. Prioritisation and the approach to weed management is addressed in Sect 19.1. The EWS for WA is used as a guide to develop priorities and weed management strategies at a local level	1(b)
1	19.2	As the organiser of a community group within the Windy Harbour reserve, we have actively been involved over a five (5) year program to eradicate Victorian Tea Tree. The group has actively assisted CALM also in removing it from the surrounds of the reserve. Other species of weeds have been identified and targeted. This proactive group has prepared a management plan for weed removal within the Windy Harbour reserve	Noted	2(a), 2(h)
1	19.2	Rose pelargonium is by far the greatest environmental weed threat to the planning area. This weed species has the long-term potential to displace most native vegetation in vast tracts of coastal heath and dune areas, unless methods can be found to control its spread. In several patches near the Banksia Camp area Pelargonium has already displaced most native species	Noted. This species is rated as 'high' in the EWS. Pelargonium populations are monitored by the District. Hand weeding and spraying has occurred in an effort to eliminate small populations or to minimise its spread in the case of larger infested areas. The size of the larger populations dictates that only a chemical or environmental control method will be effective and the District is currently working on a solution to this issue that will not adversely effect the adjacent ecological values. The final plan will state management as Control/Monitor	1(d)
1	19.2	The integrity of the entire coastal heath and dune system is at stake through Pelargonium infestation. It is a problem and challenge of immense proportions, made even worse by the fact that once Pelargonium has started the displacement of the native vegetation, other environmental weeds are colonizing the affected areas as well. Start a scientific research program into a biological control method of Pelargonium capitatum.	As above	2(d)
1	19.2	A scientific research program should be started by CALM in conjunction with the CSIRO into a biological control method of Rose Pelargonium. Although native Geranium species occur in the Walpole region, the application of a biological control method should not be ruled out completely. This is because the Pelargonium infestations occur presently in relatively isolated locations at Banksia Camp, Peaceful Bay and Quarram Reserve and perhaps at other know locations as well. This means that there may be relatively large buffer zones between the infested areas and the native Geranium species further inland	As above	2(d)
1	19.2	I understand that some herbicide trials have been carried out. However, large-scale use of herbicides would be unfeasible, because herbicides destroy vegetation indiscriminately. My own experience with pelargonium eradication efforts in the Walpole region has shown that pelargonium seeds retain their viability for at least 15 years as seedbank in the ground, rendering physical removal or small-scale herbicide treatment very time-consuming	Recent chemical trials for Pelargonium control indicate that the use of chemicals is an option for broadscale application, depending on the choice and concentration of chemical. 2,4D Amine for example has been determined to have minimal effect on native species if used in low concentrations, but is effective at killing pelargonium	1(e)
1	19.2	Capeweed in particular is forming a fatal partnership with Pelargonium in the Banksia Camp area, having already successfully followed the intruding trail of Pelargonium into the native vegetation. Capeweed should be included in Appendix 8 under weed rating 'high'	In a regional context, capeweed is not as high a priority as other species and is rated as Moderate in the EWS. The Herbarium records of capeweed are adjacent to the parks. Where it is found to occur with Pelargonium within the parks, it will be treated in the same management program	1(e)
1	19.2	The spread of blackberry throughout the SW is a far greater threat than non native grasses	As the draft states, blackberry is a weed of national significance and has a strategic plan	2(c)
1	19.2	We would recommend that the rating given to Blackberry (<i>Rubus fruticosus</i>) in Appendix 8 be urgently raised from 'low' to 'high' in recognition of its status as a 'Weed of National Significance' (WONS) and its impact on streamline habitat. Is the Department aware of the work being carried out by the CSIRO on this species?	The EWS is a state strategy and the weeds have been assessed and rated accordingly. Blackberry as a Weed of National Significance and a "declared weed" has been addressed within the plan and the Department is cooperating with CSIRO on its work to develop effective biological control	2(a)
	19.2	Whilst discussing access generally, we note your plan has a section discussing weeds and plans for eradication. Bushwalkers are particularly troubled by blackberry and have seen one previously well used campsite and a river crossing become less and less accessible because of blackberry growth	As above. Control of blackberry continues to be a high priority in the District weed control program	2(a)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	19.2	Appendix 8 urgently requires review with particular attention to those species identified for possible eradication together with any WONS and declared weeds under the Agriculture and Related Resources Protection Act. These should be given a 'high' priority for funding that will implement effective management	Those identified as eradicate, control if possible eradicate and control will have high priority for funding	2(a)
1	19.2	I cannot see any mention in the Draft Plan of the biggest environmental disaster on our coast which is spread of the introduced Marram Grass. When I first visited Warren Beach some 65 years ago the beach was a minimum of 300 metres wide and much wider in places, Malimup and Yeagerup Beaches were similar. Now during high tides and rough weather the ocean comes right up to the foot of the sand dunes leaving virtually no beach at all. During the past 40 years the dunes along the beach have gotten higher and higher making access to our beaches harder every year. An example of this is the access to the Warren Beach. This has been caused by the unrestricted spread of Marram Grass. When you visit any of these three beaches you can drive from end to end and find it almost impossible to get off the beach. It appears that any attempt to control this imported grass, like the blackberries in the Warren National Park has been placed in the too hard basket	Marram grass is discussed on page 50 of the draft plan. It is a desirable species as it stabilises dunes. In addition as four-wheel driving is only permitted along the beach in these areas, the fact that marram grass prevents visitors from leaving the beach is beneficial. Marram grass is a naturalised species introduced into WA for dune reclamation projects. Marram grass is a successful colonizer of fore dunes creating favourable conditions for succession by other plant species. Marram grass will only grow in an environment where sand accretion is maintained. Marram grass disappears under the pressure of competition from other dune species. Native grasses are also being investigated as an alternative stabiliser	2(g)
1	19.2	Tree lucerne (Tagasaste Chamaecytisus palmensis) is taking over an area approximately 1km south-east of the old Shannon townsite near the highway and adjacent to the track into the disused gravel pit. This is the yellow-flowering tagasaste species. Tagasaste should be included in Appendix 8 under weed rating 'moderate'. Eradicate the Tagasaste infestation at that location	The weed will be added to Appendix 8 however the EWS rates tagasaste as 'mild'	1(b)
1	19.2	The easterly freehold lot 3 at Broke Inlet, known as "Clare House" has Agapanthus and a large population of Potato creeper towards the eastern lot boundary. Potato creeper is a very aggressive weed and hard to eradicate. So far this plant has not crossed over the track along the eastern property boundary and should not be allowed to do so. Negotiations with the owner should take place as to what action might be necessary regarding the weeds. Investigate Agapanthus and Potato creeper infestations at Lot 3	This is already occurring in relation to a large number of weed species occurring in the area. Appendix 8 will include a list of potential weed species that are known to occur within 2km of the planning area, however both weeds you mention have not been included as there were no Herbarium records and there are multiple species which have the common names you refer to	1(b)
1	19.2	Some years ago I did a horseriding expedition through the D'Entrecasteaux National Park. I noticed lots of thistles growing in some sections of the park - about the only weed I noticed	Noted. Thistle appears in Appendix 8 of the draft plan	2(b)
2	19	Objective: Change to "The objective is to minimise the impact contain and as far as possible eradicate of environmental weeds on park values in the parks." Minimising the impact of environmental weeds on park values is not an appropriate objective in a national park. Environmental weeds should be contained and, as far as possible, eradicated	The objective is appropriate and not as restrictive as the one proposed. Eradication is difficult if not impossible to measure, especially across large areas such as the parks	2(d), 2(e)
1	19	Make sure all weeds are eradicated from all CALM land across the state, plan for budget to do so	As above	2(d), 2(e)
1	19	Recognise that some weeds can be eradicated thus avoiding future expense and environmental damage	The plan recognises this	2(a)
2	19	Supports controlling and eradicating environmental weeds	Noted	2(a)
1	19	We support CALM's on-going commitment to manage weeds	Noted	
1	19	We seek assurances that CALM has sufficient resources to effectively manage weeds on an on-going basis in the Shannon and D'Entrecasteaux National Parks	The Department regards weed control as a high priority for resourcing	
1	19	I would like to see controlling and eradicating environmental weeds	Refer to strategy 1, 2 and Appendix 8	2(a)
4	19	Support controlling and if possible, eradicating environmental weeds	Noted	2(a)
1	19	Control and removal /eradication of all woody and herbaceous weeds and exotic plants within and bordering these national parks	Noted	2(a)
1	19	There is little information on how and to what extent control will be pursued. We are left with the impression that weeds will be monitored to some extent but very little specific planning or activity has been directed to their control	The strategies presented in the plan provide sufficient direction for the control of introduced and other problem animals. More detailed planning will occur at an operational level and are not appropriate for a management plan	2(h)
1	19	Nearby residents need information about removing and not growing invasive plants i.e. Eastern States Wattles etc	Refer to strategy 2	2(a)
2	19	Strategy 4. This includes making fire breaks or fighting fires where the use of bulldozers should be kept to the absolute minimum	Noted	2(a)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	19	Weeds are obviously a huge problem. Persuade the local communities to help. They have little or no appreciation of the problem. A huge promotion is needed in this area. Consider offering free local National Park Passes to people who go on three or more weed extraction excursions	Various methods and strategies will be employed to encourage the public to become involved in conservation management including use of volunteers. Volunteers involved in programs such as weed control within the Parks are already entitled to free parks passes and other benefits once they accumulate enough volunteer hours. The Department is also an active member of the Manjimup Weed Action Group	1(d)
2	19	KPI 19.1 should include as a target no new environmental weeds in the Parks	No new environmental weeds in the parks is often beyond the control of the Department	2(c)
1	19	Add KPI 19.3 No new weed species established	As above	2(c)
	20	Introduced and Other Problem Animals		
1	20	Rabbits, deer, horses, redfin perch, mosquito fish, honey bees, yabbies, introduced molluscs I do not believe cause a problem because of the low numbers, the chance of the numbers increasing is low because of the environment they live in	Regardless of the numbers, the Department has a responsibility to conserve biodiversity and therefore control all introduced and problem native animals and these species do cause a problem in relation to biodiversity values as stated in the draft plan	2(d), 2(e)
1	20	The DMP does not mention the Rainbow Lorikeet which has been breeding profusely in Western Australia over the past twenty years. While the Lorikeet does not at this point pose a management problem for the Parks, it would be prudent to monitor the Parks for Lorikeets. Recent sightings of Rainbow Lorikeets in the Great Southern indicate that they could be living in the Parks already	There have been no reported sightings of rainbow lorikeets within the parks. Farmnote 8/2002 (Lamont and Massam 2002) suggests that the areas most likely for rainbow lorikeets to become established in the south west are those with a mix of native and exotic vegetation and extensive orchards. The parks and surrounds do not contain significant areas of this mix of habitats. Passive monitoring for all introduced fauna species is carried out during regular field works and from sighting reports made by the public to the Department or the Department of Agriculture and Food	2(c)
1	20	We believe the greater detrimental issues arising from the management of the national parks as: the introduction of feral animals such as pigs, goats, rabbits, feral cats, foxes	Noted	2(a)
1	20	We believe that far greater emphasis and financial commitment is required to address the impacts of damaging agents such as this	The Department regards control of introduced and other problem animals as a high priority for resourcing	2(d)
1	20	Treble CALM budget to combat feral animals pigs, goats, camels, fallow deer, horses and bees	As above	2(d)
1	20	We seek assurances that CALM has sufficient resources to effectively manage feral animals on an on-going basis in the Shannon and D'Entrecasteaux National Parks	As above	2(d)
	20.1	Red Foxes and Feral Cats		
1	20.1	CALM's fox baiting program has had a beneficial impact, allowing a balance of small mammals, birds and marsupials to be reintroduced into their natural environment, however wild cats, in particular near the Windy Harbour settlement has increased	Noted	2(a), 2(b)
1	20.1	p51. I would query the conclusion of 'strong documented evidence that the feral cat has a significant effect on native wildlife in the south-west is scarce'. Surely Western Shield (an example of adaptive management in action) has demonstrated that populations of translocated and recovered mammals in the south-west do well once fox predation is diminished. If cats were significant, these recoveries should have failed by now	Research into the impacts of foxes and feral cats continues and most recently into whether the displacement of foxes has led to an increase in cat numbers	1(e)
1	20.1	Does Western Shield avoid all undeveloped recreation sites even, such as Oilwell Track? It might be worth clarifying this in the plan	Informal sites are not excluded from baiting programs. However, Oilwell Track is not a undeveloped site (there is a hut and permit camping)	2(h)
1	20.1	Feral foxes and cats have not helped and should be controlled by poisoning. The best way to do this is to integrate the baiting/trapping programs with the burning programs	Baiting and prescribed burning programs are in fact integrated. Supplementary baiting is undertaken in areas containing significant fauna species that have been recently burnt and are within 3km of private property (i.e. high fox/ cat reinvasion potential)	1(e)
1	20.1	Feral cats and foxes. The baiting program should continue and farmers should be encouraged to assist on private property	Noted. Refer to strategy 3	2(a)
	20.2	Rabbits		
1	20.2	Rabbits within the Windy Harbour settlement and surrounding areas are almost at "plague" proportion and the Shire of Manjimup and Windy Harbour Advisory Committee in liaison with CALM officers have investigated various methods of removal, including the introduction of the calici virus. Rabbits are causing a catastrophic effect on the grasslands, flora species and creating soil erosion	Rabbit numbers and associated environmental impacts in the parks appear to correspond to the presence and effectiveness of myxomatosis and calicivirus. The Department will comply with the proposed Environment Protection and Biodiversity Conservation Act and associated rabbit threat abatement plan	2(a), 2(c)
	20.3	Pigs		
1	20.3	I support the controlling of pigs	As above	2(a)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	20.3	Feral animals, in particular pigs have been identified as a major concern within the parks and steps need to be taken to implement a management plan to control this problem and not just monitoring. While considerable attention is made to dogs within national parks, wild pigs have a greater detrimental affect on the environment	The District regards control of introduced and other problem animals as a high priority for resourcing. There is an extensive pig management program occurring in the park which involves trapping, shooting, tracking and in the near future baiting. The Department is also an active participant in community based feral pig control groups based in Northcliffe, Nannup and the Rocky Gully areas	1(e)
1	20.3	I would like to see controlling and eradicating feral pigs	As above	2(a)
1	20.3	Get rid of all feral pigs it looks like a ploughed paddock where they are and have been	As above	2(a)
1	20.3	Inadequate feral animal control (the distribution and prevalence of feral pigs in the Shannon & D'Entrecasteaux NPs has increased substantially during the previous management plan without significant management intervention)	As above	2(a)
1	20.3	We live on Nelson Loc 7641. Feral pigs have been sighted on our property. They have already at the Gardner river. I would suggest that they are at the Meerup River and around the wetlands of Lake Doggerup. They have to be removed	As above	2(a)
1	20.3	Feral pigs are a major distributor of the dieback pathogen. All other measures employed by CALM trying to stop the spread of dieback are potentially being nullified by the presence of feral pigs. This alone makes an intensive eradication program mandatory	As above	2(a)
1	20.3	Pigs have spread from Lake Muir to Northcliffe. Devastation of the wetlands and plains is inevitable unless a serious effort is made to control them. There seemed to be more concern about dogs being used in hunting than the explosion in the pig infestation	As above	2(a)
1	20.3	Apart from the environmental damage caused by pigs, the safety for users of the Bibbulmun Track is of utmost concern. A boar or a sow with piglets can be highly aggressive. A pig may not move from its hiding place until almost being stepped on it often then attacking. It would have repercussions on the tourism sector if a pig attack on a walker should occur. I have videoed and photographed feral pigs trotting along Pingerup Road which is also used partly as a section for the Bibbulmun Track. The prospect exists that pigs and walkers might be sharing the same tracks through our wetlands and forests. Feral pig territory is incompatible with our world-class Bibbulmun Track	Noted. As above	2(a)
1	20.3	Feral pigs are a huge problem within the Park, causing damage to native flora and fauna as well as adjoining private property. This problem should be given greater priority than it has in the past. I believe keeping all logging roads open will be of benefit in controlling these feral animals	As above. The status of logging roads will be considered under Section 26 of the plan. Roads required for management purposes will be retained where necessary	2(a)
1	20.3	The sport of pig hunting must never be allowed in our South West areas, as the hunters by definition are very much interested in having large numbers of pigs within their hunting grounds, rather than eradicating the pigs there. Nor should licenced pig shooters be employed, because pigs are intelligent animals that very soon learn the meaning of the sound of firearms. Hunted pigs become sly and cunning pigs. Just as you cannot eradicate foxes by hunting them, so you cannot eradicate feral pigs by hunting them, particularly not in our South West densely vegetated forests and wetlands	A variety of methods are used to control pigs including trapping and hunting. Shooting by trained and competent shooters is recognised as a humane control method	2(f)
1	20.3	The trapping programme is good but not effective enough. Other eradication methods including baiting should be investigated perhaps in conjunction with the CSIRO	As above, the Department is also working on the development of an effective bait to use in the control of feral animals other than foxes. A new bait will be trialled for use on feral pigs in 2008	
	20.6	Feral Dogs/Dingos		
1	20.6	p53. Dingoes. Not as you have it	Both spellings are acceptable across Australia, however it will be changed to dingoes to be in line with the majority of uses within the Department	1(e)
1	20.6	Wild dogs. Should be hunted but the baiting program should prevent the numbers increasing	Noted and the management plan provides strategies to do this, however dingoes are protected on conservation estate under the Wildlife Conservation Act	2(a)
1	20.6	Table 3 P 51. The dingo is listed as both a Declared Species under the Agriculture and Related Resources Protection Act (2001) and also as protected under the Wildlife Conservation Act. Suggest that if the dingo is not endemic to the Parks (which I believe it is not) then it should not be listed under the Wildlife Conservation Act. If the Wildlife Conservation Act does not recognise geographical distributions within Western Australia then perhaps the Act should be amended accordingly	Anecdotal information from the early settlers indicate that the dingo was quite wide spread in the parks. The dingo is as "endemic" to the parks as anywhere else in the State, and date back thousands of years	2(c), 2(g)
	20.7	Kookaburras		

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	20.7	Kookaburras. I have seen kookaburras diving into my dam and can only assume they are eating marron. I have also seen a kookaburra remove the last of a small duckling following its mother in single file. I therefore believe kookaburras should no longer be on the protected list	Whilst it is known that kookaburras predate on native species and compete for food sources, the level of impact is unknown due to a lack of research. The laughing kookaburra is protected under the Wildlife Conservation Act and any proposal to change its protected status is outside the scope of this plan	2(c)
1	20.7	Harry Butler described Kookaburras as feral cats with wings. They predate on small animals such as pigmy possums, destroy bird's nests and eat the fledglings. A group of landholders on the Warren River declared war on all feral animals and kookaburras over a 30yr period. The population of fire-tail finches went from a rare sighting to five colonies of around 14 birds each and the small native animal population increased. It is fortunate Long (P53 1981-1988) did not research feral cats and foxes as western shield would not have happened. CALM must be commended for this excellent program	As above	2(c)
1	20.7	My personal beef is the kookaburra problem. I can't believe that these pests are protected and I would dispute Long's statement that they have little or no impact on small birds. Thirteen years ago when I first moved to Northcliffe, people visiting my house would be amazed at the amount of blue wrens (about 30), fire tail finches (6), fairy wrens and honeyeaters, there was only the odd call of the Kookaburra around sunset. Now I have very few small birds, only a few blue wrens left, no firetail finches, and only a few honeyeaters left. On sunset, you can hear so many kookaburras laughing on all sides and from all directions I have also seen them attack my baby chickens, get rid of the kookaburras and bring back the small birds	As above	2(c)
1	20.7	Kookaburras. As one who has worked in the Karri forest for 50+ years I do not agree that these predators cause little or no damage to other birds. When the Parakeet are nesting in karri trees the kookaburra preys on the young birds	As above	2(c)
1	20.7	The discussion of Kookaburras does not appear to adequately recognise the full effects of kookaburras on native fauna. I would agree that the effects of kookaburras have not been well studied. I understand that in eastern Australia the kookaburra is to some degree controlled by goannas that raid the nests for eggs. This does not seem to occur in Western Australia and so there is no natural restriction on the kookaburra population. This is in accordance with the readily observable growth in the kookaburra population	As above	2(c)
1	20.7	Anecdotal evidence from a number of sources suggests that the level of predation by kookaburras is very high. Given that they will eat birds, lizards, small mammals, amphibians and reptiles, they do pose a significant threat and should ideally be removed from the Parks before they become a greater problem than they already are	As above	2(c)
	20.8	Brown and Rainbow Trout (see also 27.1.6)		
2	20.8	Whilst acknowledging that trout may have some impact on native fish stocks, we are not aware of any quantities data which illustrates a trout-related decline in the populations. Observation indicates abundant numbers of galaxia and pigmy perch in both the Warren and Donnelly river systems. These species are thriving in waters which have been stocked with trout for recreational purposes since the 1970s	As the draft states, authorised trout stocking occurs without any impact assessment on threatened or other native species, or an assessment to the cost-benefits of stocking for the recreational fishery	2(d)
3	20.8	Whilst acknowledging that trout have some impact on native fish stocks, recent studies reveal that the relative predatory impact of redfin perch is significantly greater than trout (Molony et al 2004). It has also been suggested that in the absence of trout, redfin perch populations are likely to escalate leading to an increased threat to native fish populations (Fisheries Management Paper 179). Given that redfin perch are known to occur in the Warren River, serious consideration should be given to this issue before any decisions regarding the future stocking of trout upstream of the D'Entrecasteaux National Park can be made	Agreed that this should be further investigated by the Department of Fisheries and others	2(c), 2(d)
2	20.8	If native species are in fact in decline, other factors such as the impact of environmental changes and all introduced species need to be considered also	Noted	2(d)
2	20.8	It would seem that trout have been made the villain of the piece as they are easier to control than redfin perch and can provide a short term 'solution' irrespective of whether or not this solution is the correct one	Any introduced species is a concern, and in this case trout, redfin perch and mosquito fish are all introduced fish of concern. However, only trout continue to be released into the upper reaches of the parks' catchment	2(e), 2(g)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	20.8	There are no quantitative data in the Draft Management Plan that show a trout-related decline native fish numbers to justify closure of the trout fishery in the region. There are abundant native galaxia/minnows and pigmy perch in both the Warren and Donnelly rivers, tributary streams and dams, which can be observed by any visitor. For example, Beedelup Dam, upon which the Karri Valley Resort is based, has abundant galaxia and pigmy perch populations co-existing with heavy stocking of trout for tourists since the 1970s. My observation of trout stocked farm dams, including my own, shows galaxia and pigmy perch survive and co-exist with heavy stockings of trout. In contrast to the Warren and Donnelly Rivers, the Shannon River is not stocked with trout, yet on my observations of these rivers over 30 years, there are no more galaxia/minnows evident in the Shannon than can be observed in the Warren and Donnelly Rivers	Impacts have not been quantified, although they are widely recognised. Refer to Morgan <i>et al.</i> (2004) " <i>there is an urgent need to determine the level of predation by trout on the endemic fauna...in water bodies that currently contain few or no trout, pre- and post-stocking. Until this work is undertaken, no further stocking of trout sp. should occur in areas of high conservation value.</i> "	2(g)
1	20.8	Research finds the trout do not heavily impact on native species because in most cases they do not occupy the same waters	This is not supported, they may have already been excluded from the habitat	2(g)
1	20.8	Dept Fisheries (2002) The Translocation of Brown Trout (<i>Salmo trutta</i>) and Rainbow Trout (<i>Oncorhynchus mykiss</i>) into and within Western Australia says there is no danger of transfer of pathogens as the CALM draft implies. This is scaremongering and should be taken out or explained	The draft is clear by stating that the impact is unknown	2(d)
1	20.8	On p54 Jackson et al (2004) criticised trout management in Australia as being too focused on providing improved recreational angling opportunities at the expense of management of trout impacts. However, this draft management plan totally excludes the management of (local) business impacts. In other words, in my area of concern i.e. the suggested non-stocking of trout in the whole river system, this draft management plan does not address the impact this would have on hundreds of local businesses that rely on the income generated by fishing tourism	It should be kept in mind that, as the draft states on p77, Carlsen and Wood (2004) attributes \$62 million to the local economies between Manjimup and Walpole each year to nature-based activities, the natural environment and the attraction of tall forests. It can be assumed that the national parks in this area are directly responsible for contributing much of this. However, the value of the parks must be considered as a whole, not just for recreation and tourism but also for conservation, for the present and future generations	2(d)
1	20.8	The attitudes of the CCWA and CALM presented in this section reflect a prejudice against recreational trout fishing leading to a recommendation in Part E, which if implemented, would be very damaging to tourism in the Manjimup Shire	As above	2(d)
2	20.8	We point out that it is not the responsibility of the Conservation Commission to make recommendations regarding the stocking of trout upstream in rivers that flow into the park. That responsibility is clearly with the Dept of Fisheries who through the RFFSS will develop a balanced and responsible approach	The Conservation Commission can make recommendations to the Department of Fisheries, but the Department of Fisheries will make the decision	2(g)
	20.9	Redfin Perch		
1	20.9	While Redfin Perch is present in the rivers of the Parks, I would like to make a comment as to the Donnelly River. I have fished these waters for nearly 41 years and it has come to my notice that while Perch are present in the upper tributaries of the Donnelly, none (lets say minimal) have been evident at and below Boat Landing Road	Noted, however this is a matter of opinion and probably related to fishing effort. Trout have been caught as far down stream as the huts	2(e)
1	20.9	CALM states that there "is no realistic control option" for redfin perch and mosquitofish. If more research is needed, add a levy to all fishing licences with an explanation why this is so	Fishing licences are obtained from the Department of Fisheries, however it is agreed that more research is required	2(c)
	20.11	Honey bees		
1	20.11	p55. The honeybee was introduced to WA before 1835, as FC Irwin in his book (The State and Position of WA...) published in that year mentions its importation to Albany	The Department of Agriculture refers to 1846 as being the year of importation to Western Australia. It may be that the 1835 importation to Albany was unsuccessful. Without more information no change will be made	2(g)
1	20.11	S. 20, p51. First paragraph lists the potential for serious impacts on natural systems. This section is short of one other major issue identified by the apicultural community and that is, the loss of hollows due to CALM's burning program which is taking out old trees with hollows in them along with the clear felling of forests, putting more pressure on the remaining parks. These practices have a serious impact on ecosystems both directly and indirectly	Old growth forests are protected from logging and managed to avoid intense wildfire (refer to p 46 of draft plan). Some variability in fire intensity is perhaps desirable because fire also has a role to play in the formation of hollows. Section 22.2 Fire Ecology will be amended to include Old Growth information. Forest harvesting practices in State Forest are outside the scope of the plan	1(e), 2(c)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	20.11	P 55, Impacts on Natural Values. We query the references used and the information expanded on in dot point three. The results are inconsistent with other research done in Australia and may be a problem. The statement "Managed Honey Bees can remove 80% or more of the floral resources produced" Is this a documented fact? If so, industry around Australia will dispute this (Paton 1979, per.com. & D Paton U. Adel. 1990-91). Managed hives are in the forest when there is a major flowering, so the nectar source is very abundant so native species, birds and insects are not deprived of food. Again our evidence shows that commercial bees are simply harvesting the surplus nectar and pollen that was not used by native biota and as a result were having not having an effect on reproductive success	Refer to Paton (1996) p21 and Paton (1997) p23. Section 20 is concerned primarily about species that have been introduced into the parks which means feral and managed honey bees. This particular impact is one of the reasons why feral honey bees should be eliminated and why managed honey bees need to be assessed against criteria to maintain the natural values of the parks. In this instance, the impact on floral resources have not been relevant in the assessment of these parks as there has not been any threatened nectar or pollen feeders, or native bees, or other threatened or priority species dependant on any impacted fauna determined. Section 38 and Appendix 14 has more information on the criteria used to assess commercial hoeny bees	2(g)
1	20.11	p55. Para 4. Note errors in the text. The text needs to be changed to read "colonies" rather than new hives as it is a clear definition of what is inferred	Agreed, the word "hives" will be replaced with "colonies"	1(e)
1	20.11	P55. Para4. Re Black Cockatoos. The issue of Black Cockatoos and nesting sites has been poorly addressed in the past. Honeybees prefer a cavity that has a very small entrance and a volume of about 37L (Seeley, 1977). Such cavities would not be suitable for most native fauna for nesting sites. Studies incidental to the question during the 1980s by the CSIRO Division of Wildlife and Rangelands Research near Bega on NSW south coast have supported Seeley's hypothesis with the further observation that the environmentally rich forests of that region contain a high percentage of tree cavities unoccupied by either native fauna or honeybees	In regards to the use of nesting hollows by feral bees – there have been a number of observations made by researchers, cockatoo expert Ron Johnson and others through the Cockatoo Care Program of feral bees using nest hollows previously used by black cockatoos and bees entering nests currently occupied by breeding pairs	2(e), 2(g)
1	20.11	P55. Not mentioned is the preference of feral bees to gain access to tree hollows via openings that are too small for native fauna to use	As above	2(e), 2(g)
1	20.11	P55. Para4. Re Black Cockatoos. Competition for nesting sites is not limiting to native fauna. One needs to take a bigger look at this issue as it is a combination of many factors not feral bees that need to be blamed. What of the reduction of trees on farmland? What of the lost sites due clear felling state forests? or of mining or urbanisation or fires and dieback?	Reduction of trees on farmland, harvesting practices in State Forest and the impacts of urbanisation is beyond the scope of the draft plan	2(c)
1	20.11	P55. Tree felling is not mentioned as a general cause of the shortage of tree hollows for native breeding sites	As above. It is acknowledged that loss of remnant vegetation is having a significant impact on species that rely on tree hollows, however the only trees that are felled within the plan area are those that are required to be removed for management and maintenance purposes or that pose a safety risk to park staff or the general public. For example improvements to access that necessitate road widening, removal of trees that are a threat to public safety in camp grounds etc. Wherever practicable leaving the tree standing and treating or removing individual limbs is preferred but this is not always possible	2(c), 2(g)
1	20.11	P55. Second last paragraph. Black cockatoos affected by land clearing is not mentioned. This is considered to be more serious than the honey bee. A survey of nesting boxes recently erected for cockatoos on trees around Wellington Dam resulted in only 1.25% attracting feral bees	Section 20 is on introduced animals and as such the impact of feral bees on cocatoos is relevant in this section whereas the impact of clearing on cockatoos is not. This information can be found in section 18 Species and Communities of Conservation Significance - Fauna page 37 of the draft plan	2(d), 2(g)
1	20.11	P55. Para4. Re Black Cockatoos. The biggest threat to the loss of hollows is CALM's burning program which is taking out old trees with hollows in them	Fire is a natural part of the Australian landscape. Prescribed burning using a mosaic of temporal, spatial and fire intensity patterns is used to maintain the general health and biodiversity of the ecosystem. During burning and fire events some hollow-bearing standing trees will fall creating habitat for other ground-dwelling fauna and organisms, whilst new hollows will be created in other standing trees. Trees containing hollows have a limited (finite) life-span and fire has an important role in the continued creation and replacement of habitat for all fauna. The final plan will include more information on protecting hollows in its fire management progra,	1(e)
1	20.11	P55. The stated feral honey bee occupation of this limited resource for 20 to 50 years is questioned mainly due to the debilitating effect of American Foul Brood disease on such swarms	Feral bees are impacting on native species by taking available hollows and AFB disease is not alleviating this	2(g)
1	20.11	P55. Exposure of native bee brood to more predators? What are they?	Ants, spiders and other fauna (Schwarz and Hurst 1997)	2(b)
1	20.11	P55. Affecting seed set of native species. This possibility is noted	Noted	2(a)
1	20.11	P55. Para 4. Re Canola crop causes swarming effects. This crop, if not managed properly can be counterproductive from a beekeeping perspective and a future feral bee point of view. Chemicals and bio-nutritional compounds contained in the pollen appear to build bee brood quicker and this can lead to the bees swarming. In looking at the draft for the Shannon & D'Entrecasteaux National Parks one has to address the question - where would there be Canola grown within proximity of the area relating to this plan?	It is a general statement on the impact on natural values	2(a), 2(b)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	20.11	P55. Para 5. Agree with the statement "...any control program should not affect the production or quality of commercially produced honey and needs to be safe for native insect populations" but the unaddressed question is: How would this be implemented? Who would control this and what co-operation would there be with the Apicultural community?	There needs to be further research undertaken on feral bee control and that is being undertaken by the Department in conjunction with the Cockatoo Care program. Strategy 10 addresses the issue of supporting research and Strategy 8 will be amended to include liaison with the apicultural community	1(e)
2	20	The objective as it stands doesn't make sense. Since all the introduced animals discussed in the section are problem animals, they should all be contained and as far as possible eradicated. There should be a special effort to reduce the numbers of feral pigs. The objective should be "The objective is to contain and as far as possible eradicate introduced animals in the parks."	Eradication is difficult if not impossible to achieve or measure, especially across large areas such as the parks. It is also the objective of the plan that any control methods does not impact on key values of the parks, such as natural or recreational. For example that a shooting program did not endanger any visitor's life or that a control program for introduced fish does not impact on native fish etc	1(e)
1	20	Supports controlling and eradicating feral pests	Noted	2(a)
1	20	I would like to see controlling and eradicating non-native animals	Noted	2(a)
4	20	Support controlling and if possible, eradicating feral pests	Noted	2(a)
1	20	Controlling and if possible, eradicating feral pests, especially pigs	Noted	2(a)
1	20	Introduced grazing animals and feral pigs need removing and eradicating	Noted	2(a)
1	20	We support CALM's on-going commitment to manage feral animals	Noted	2(a)
1	20	Funding to eradicate pests such as feral animals (particularly pigs) should be made available	The District regards control of introduced and other problem animals as a high priority for resourcing	2(a)
1	20	I endorse the protection of mammals through the practice of fox baiting and feral animal control generally, including pig and dog culling	Noted, however dog culling is not part of the draft plan	2(a)
1	20	Put 1080 out for other animals over vast areas	1080 is used where it is an effective control method 1080 baits have yet to be developed that will provide effective, target specific control for feral animals other than the fox. A new bait will be trialed for use on feral pigs in 2008	2(d)
1	20	There is little information on how and to what extent control will be pursued. While considerable attention is given to the control of domestic dogs and horses, we are left with the impression that feral animals will be monitored to some extent but very little specific planning or activity has been directed to their control. The relatively recent and apparently unhindered encroachment of pigs throughout the park gives little reason for optimism	The strategies presented in the plan provide sufficient direction for the control of introduced and other problem animals. More detailed planning will occur at an operational level and are not appropriate for a management plan	2(h)
1	20	Encourage the local communities to get involved in eradicating the Redfin Perch and the Mosquito Fish and tell them why and how. Can Ribbons of Blue be involved here?	Various methods and strategies will be employed to encourage the public to become involved in conservation management including use of volunteers	2(a)
1	20	I disagree with action 6 to continue to prohibit stocking of non-native species in all water bodies in the parks, in part because parks are often the best place to fish - a lot of the rivers flow mainly through private land	Refer to discussion/action taken under 27.1.6	2(c), 2(e)
1	20	Trout travel extensively, even going out to sea, so stocking outside the parks, but not within the parks, appears strange, as the trout (and any fish) travel throughout the river, especially the lower, fresher regions	As above	2(a), 2(b)
1	20	I find it ironic that government charges the public a licence to fish for trout and perch given they are introduced species	Noted. The charging of licence fees for fishing is the responsibility of the Department of Fisheries and therefore outside the scope of the plan	2(c)
1	20	Complete removal of ferals has low feasibility	The control of feral bees will focus on areas of high conservation value, recreation sites and in consultation with the industry	2(b), 2(d)
1+4	20	Support controlling and if possible, eradicating feral bees	Noted	2(a)
1	20	Feral bees need to be removed	Noted	2(a)
1	20	Try TV ads for public what to look for e.g. molluscs, yabby, European bees, if any in Australia?	Noted Strategy 9 allows for advertising if it is considered to be effective and appropriate	2(d)
2	20	KPIs should be 20.1 "No new introduced animals" 20.2 "No increase in the current numbers or range of introduced animals" and 20.3 "Reduction in the 2005 numbers and/or range of introduced animals"	No new animals is difficult if not impossible to achieve or measure, especially across large areas such as the parks. KPI20.1 was missed out of the draft plan in error, however it related to the threat to native species and communities and the target is no increase in the level of impact on the Reedia swamps from pigs and also no loss of populations of critical weight mammals attributable to foxes	1(e)
	21	Diseases		
	21.1	Plant Diseases		
1	21.1	Plant disease is an area of great importance	Noted	2(a)
	21.2	Disease caused by Phytophthora		

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
	21.2.2	Effects		
2	21.2.2	The section of Pc is not specific to the parks. We are losing species of the Proteaceae and Epacridaceae families in D'Entrecasteaux National Park in particular but also in Shannon National Park, where we are losing species even in karri forest	Noted. The information contained in the draft plan is relevant to the parks	2(d)
	21.2.3	Management		
1	21.2.3	The problem of dieback needs to be addressed urgently in order to contain it. Target especially high visitor use areas e.g. Lake Jasper	Noted and the draft plan provides strategies to do this. Target areas will be prioritised according to a number of factors including the presence of protectable areas, location of threatened species etc - not just high visitor use. Some high visitation areas may already be infested or may contain species not susceptible to the disease	2(a), 2(d)
1	21.2.3	Dieback needs greater management. The problem needs to be assessed and problem areas targeted especially in sensitive areas with high visitor use e.g. Lake Jasper	As above	2(a), 2(d)
1+4	21.2.3	Protection from Phytophthora dieback be much stronger than CALM's standard disease management guidelines, with every effort made to prevent its spread into un-infested areas	As above	2(a), 2(d)
1+912	21.2.3	Would also like you include the following in the final management plan: More steps to prevent the spread of dieback. (p60)	Noted and the management plan provides strategies to do this	2(a)
1	21.2.3	We believe that far greater emphasis and financial commitment is required to address the impacts of damaging agents such as this	Noted, however managing disease is very costly and whilst the Department regards disease control a high priority for resources, much more would be needed to adequately map all plant disease in the parks	2(a), 2(d)
2	21	Change strategy 1: Mapping disease "presence and" spread...	Noted	1(d)
2	21	The emphasis on 'protectable areas' is misplaced and contradicts the objective, which is to prevent introducing diseases into disease-free areas. These are national parks in one of the world's biodiversity hotspots. Every effort should be made to prevent the spread of Pc into any uninfested area. Change strategies 1, 2, 3, and 9 to refer to uninfested areas accordingly	The sheer scale of Pc infestations makes the suggested objective to "prevent the spread of PC into any uninfested area" impractical. Practical Pc management dictates that resources be concentrated on retaining protectable areas and preserving threatened areas of priority flora	2(f)
1	21	Inadequate biosecurity measures (fundamental issues such as comprehensive mapping of existing Phytophthora disease areas have not been done)	Noted, refer to strategy 1 which identifies the need for mapping of dieback and identification of probable protectable areas. Areas of D'Entrecasteaux National Park are also being considered for inclusion in the NRM funded "Project Dieback" to gather more information on Pc distribution away from existing access roads and access points	2(a), 2(d)
2	21	Pc is not getting the status that it needs. Its impacts on biodiversity have already been immense and we are often dealing with post-Pc vegetation. It is therefore imperative that we find out as a matter of urgency what areas still support good coastal vegetation, what has gone, what is threatened and what, if any, large areas of vulnerable vegetation are still disease free. These areas, where we still have vegetation that has been lost elsewhere, must be made a priority and singled out for greater protection in the long term. We need to record the history of the disease now because, through combined effects of Pc and frequent fire, what is there now won't be there in 50 years	Noted, refer to strategies 1 and 2 and as above	2(a), 2(d)
1	21	It is staggering to think that the extent and probable expansion of the disease has yet to be mapped, given its potential impact on the flora and its influence on the provision of access to the park. This issue should be a priority issue in the management plan	As above	2(a), 2(d)
1	21	We are similarly concerned that detailed mapping of dieback (Phytophthora cinnamomi) symptoms has yet to be undertaken despite its potential impact on the flora of the park and its influence on the provision of access to the park	As above	2(a), 2(d)
4	21	The parks must be mapped immediately for the presence of Phytophthora dieback (P61)	As above	2(a), 2(d)
1	21	The parks must be mapped immediately for the presence of Phytophthora dieback. With all due respect given how hard it is to prevent the spread of dieback, with areas so special as these, we need to do even more to try to protect them from Phytophthora. The management plan needs to fully describe how this will happen and outline the additional measures that will be taken to prevent its spread, given that current measures are not working	As above, refer to the other strategies for management	2(a), 2(d)
1	21	Mapping / management of Phytophthora C	As above	2(a), 2(d)
1	21	I would like to see surveillance and strong control of the Phytophthora dieback disease	Noted and the management plan provides strategies to do this	2(a), 2(d)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
2	21	The obligate seeders in particular are adversely affected by disturbance such as fire, which is speeding the demise of these species. In addition to urgent mapping and taking all measures to prevent the spread of Pc into uninfested areas, we must also ensure that fire is not too frequent	Noted. Appropriate fire regimes are provided for in sections 16 Native Plants and Plant Communities and 22 Fire	2(a), 2(d)
2	21	Plan requires greater assessment and management of dieback on access tracks, especially in sensitive ecosystems	Refer to strategies 3 to 7 for managing access. All Departmental activities that have the potential to move infested soil are subject to a Pc survey and development of a Hygiene Management Plan for that activity. This ensures that the risk of disease spread is minimised. Maintenance and management of open public access tracks aims to minimise the risks of spreading the disease through general vehicle use. This includes seasonal track closure, improved drainage, removal of track duplications and encouraging park visitors to remain on approved access tracks	2(a), 2(d)
1	21	We believe the greater detrimental issues arising from the management of the national parks as: the spread of disease as a result of increased access	As above	2(a), 2(d)
27	21	There must be greater assessment and management of dieback on access tracks, especially in sensitive ecosystems with constant visitor use, e.g. Lake Jasper Road and Yeagerup Track	As above	2(a), 2(d)
1	21	The latest increase of the use of 4WDs in our national parks needs to be addressed. I feel that access should be restricted because of the possible spread of disease, there should also be wash down areas at the entrances to our parks and all vehicles should be washed before they enter. I know this sounds like a challenge, and it will be, but I think it is necessary for the health of our living parks	As above. The provision of washdown facilities at all entrances to the parks is an ineffective and unnecessary option as entrance points may already be effected by PC and other infestations may occur further along the access roads. The level of cleanliness required for a muddy vehicle to be rendered PC free would also discourage park visitors from using the facilities	2(a), 2(d)
2	21	strategy 5: Providing the public with information about plant disease, emphasising the need to stay on approved roads and tracks and other ways to minimise "spread" of disease	"Spread" is implicit in "impacts"	2(d)
1	21	Is there a need to teach tourists how to avoid spreading dieback?	Refer to strategy 5. Information on controlling the spread of dieback is made available to the public in a variety of forms including signs, publications and media releases	2(a), 2(b)
2	21	While the objective is acceptable, the KPI is not. The Performance Measure under 21.1 should be "Uninfested areas within the parks." The Target should be "No new human-assisted infestations of disease caused by P. cinnamomi in uninfested areas in the parks"	Practical PC management dictates that resources be concentrated on retaining protectable areas and preserving threatened areas of priority flora	2(d)
2	21	There should be a new target for KPI 21.1 namely: "Mapping P. cinnamomi presence and spread and identifying uninfested areas in the parks using aerial photographs or similar, and available knowledge of disease spread". The reporting requirement for the new target should be one year	The KPIs are outcome based, not output based. Your suggestion is a measure of the performance of the strategy not the objective. The measure of the strategy will be completed at the plan's audit	2(d)
	22	Fire		
	22.1	Fire History		
2	22.1	Experts not associated with CALM should be engaged to write the history and ecology of fire in WA's natural environment. CALM should not use pseudo history and pseudo science (DMP, pp 62-71) to try to justify repeated burning at short intervals	The management plan provides information from numerous expert sources not associated with the Department and proposes strategies for fire management that includes both long and short fire intervals, depending on the appropriate regime for the area concerned. The Bushfire CRC project is also examining a range of environmental attributes in areas that have experienced differing fire regimes over the past 3 decades. The results of the CRC project will be published in peer reviewed scientific journals	2(d)
1	22.1	Government should take heed of the pre and post Aboriginal practice	Noted	2(d)
1	22.1	The historical review skates over the fact that the lovely park areas inherited by CALM were the product of thousands of years of regular burning by Aboriginal people and a century of burning and grazing by cattlemen	Whether the biodiversity or condition of the parks is improved or not from historical fire regimes is not possible to determine	2(h)
	22.1.1	Pre-European Settlement		
1	22.1.1	The theory of fire depicted in the DMP is stated as fact, even though there is clearly insufficient evidence to verify the theory. I suggest that the prevalence of fire has been to large degree due to climate change over the past and that the species composition of forests of the South West of Western Australia is influenced by fire events. In a drying climate, some species will probably disappear even without any influence by fire but at the same time, fires can be expected to become more common over the next fifty years or so	Climate and climate change has been discussed in the draft plan in section 12 Climate Change and in the Fire History section of 22	2(d)
1	22.1.1	This information does not appear in the reference cited (Main 1996). It is more likely to have originated from an article by J S Beard around 1980	The wrong Main 1996 reference is cited, this has been corrected	1(e)
1	22.1.1	Your ref to Hallam 2000 is incorrect. The paper was published in Early Days, and your title (p149) is not correct	Reference should be Hallam 2002	1(e)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	22.1.1	What you say Abbott said is not so sweeping. You need to distinguish karri forest, southern jarrah and coastal habitats, and peruse the quotations in Abbott under South Coast and Forest that are relevant to the Park	The paragraph has been reworded	1(e)
1	22.1.1	All known records of the burning of the south-west Aborigines, as reported by Abbott (2003) occurred principally outside the region containing the Shannon and D'Entrecasteaux National Parks. Abbott has recorded 528 fires along the south-western coast and inland with only four fires being recorded in the forested area (see Fig 2, p123 in Abbott 2003). There are incorrect assumptions here. The statement in line 9 that "... Aboriginal people lit fires, principally in summer, that could be large and burn up to hundreds of hectares at 3 to 5 year intervals" would appear to be not applicable to the area under review and should be deleted. If CALM are attempting to set the scene for regular burning of these National Parks by taking into account the method practised by Aborigines, the community is being misled	As above	1(e)
1	22.1.1	p62, para 2. Referring to the 'southern forests' as unoccupied by Aborigines is a gross simplification. The denser Karri forest may not have been visited often but there is ample evidence of consistent Aboriginal occupation of all other forest types - which represents the majority of the area in the 'southern forests'	Noted	1(e)
1	22.1.1	The management plan appears to continue to promote the line that Noongars did not live in or burn the karri forest. They should be referred to Chapter 1 of "Contested Country" by Crawford and Crawford, which uses excellent historical research to debunk this canard	As the draft states on p63, irrespective of Aboriginal burning patterns that the application of historic fire regimes may no longer meet biodiversity conservation objectives	2(d), 2(e)
1	22.1.1	It should be noted that the argument about the extent and frequency of past burning is quite irrelevant as fire management in the area should be centred on contemporary biodiversity conservation and community safety objectives and needs. This is acknowledged in the draft: Irrespective of the burning patterns of Aboriginal people and the graziers of the past, environmental conditions have been altered to such a degree over the past 100 years that the application of historic fire regimes may no longer meet biodiversity conservation objectives (Hopper 2003)	Noted	2(a)
1	22.1.1	p63, Para 2. Hopper's view is extremely cautious. It is correct to caution against extrapolating data from localised sources to infer fire history over large areas. However the evidence from so many localised sources provides very strong evidence that regular use of fire by Aboriginal people was in fact common and extensive	Further research (Burrows and Wardell-Johnson 2003, Enright <i>et al.</i> 2005, Wells, Hopper and Dickson 2004) has questioned the validity of the grass tree technique (and its widespread application) and highlighted the need for validation using alternative methods such as remote sensing and examination of fire occurrence records. Further research, including rigorous testing of the method across a variety of sites, is required before firm conclusions can be drawn about the validity of the technique and the inferred fire history associated with the results of grass tree stem analysis	2(e)
1	22.1.1	It would be inappropriate to allow traditional burning of the forests unless a fire brigade was in attendance to deal with any unexpected loss of control of the fire	Noted	2(a), 2(d)
1	22.1.1	We believe that fire is the single most important management issue to be addressed in ensuring that the Shannon and D'Entrecasteaux National Park of the future resembles as close as possible the pre European biodiversity that had been maintained over many thousands of years	Noted	2(a)
1	22.1.1	P63, para2. "The suggested fire regime is supported by studies of Ward et al (2001), who examined fire scars on approximately 160 grass trees at 50 sites throughout the south-west jarrah forests". This alleged support for the proposed fire regime is totally unacceptable. It is not just Hopper (2003) who challenges the "Believing the Balga" hypothesis. Six other respected scientists, including CALM Director of Science Dr Neil Burrows, do not accept it. "As Ward et al (2001) did not provide information on the community types, vegetation complexes or defined ecosystems from where they collected their data, it is difficult to check whether their data are indeed relevant to the south-west as a whole. By not doing so, they implied that their data represents the range of environments in which fire occurs within the south-west. As grass-trees do not occur in karri forests and in only some types of jarrah forests, it may be difficult to extrapolate across all community types" (Burrows and Wardell-Johnson 2003)	The draft was just presenting both sides of the argument, further references will be added that are on the other side of the debate	1(e)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	22.1.1	"Aboriginals were known to set fire to [a] number of individual grasstrees as signal fires so examination of large numbers of plants is needed to infer a wide-ranging fire rather than lines of individual grasstrees ignited by passing Aboriginals...the applicability of the ["Believing the balga"] results on fire intervals to the whole of the forest region, including those not much used or traversed by Aboriginals, is, however, open to question" (Hassell and Dodson 2003). "However, evidence does not allow concluding anything more than that individual grasstrees were burnt more frequently prior to European land management than afterwards. On the descriptive evidence available, to extrapolate from individual grasstrees to the surrounding landscape is not warranted" (Wells et al. 2004).	As above	1(e)
1	22.1.1	Burrows, N. & Abbott, I. 2004. Critique of a paper submitted to the Environmental Protection Authority (EPA) of Western Australia entitled 'Fire regimes and Biodiversity Conservation: A Brief Review of Scientific Literature with Particular Emphasis on Southwest Australian Studies' by Grant Wells, Stephen D Hopper and Kingsley W Dixon. Report (8pp) submitted to EPA by CALM in response to the EPA review of CALM's fire management policy and practices	As above	1(e)
1	22.1.1	Where there is genuine debate is with the evidence from balgas, but unfortunately critics of this research are yet to detail (in peer-reviewed journals) what they object to and why, as well as contextualise their criticisms in terms of contrary evidence from other sources	As above	1(e)
1	22.1.1	p63, para 2. Could be written less vaguely than it is. "Debate" implies that there is well-founded controversy, whereas many people with pyrophobic views hold them because of the distressing and obvious immediate impact of fire-killed vegetation and animals. However, objective, analytical research does not take a particular position but instead allows the info collected to shape the conclusions derived. Thus there is no disagreement that I am aware of between Hallam and Abbott, the only 2 researchers who have delved into the historical literature. Gratifyingly, the anthropological perspective (Hallam) and the ecological approach (Abbott) align closely	There is certainly still debate to the extent of 'fire-stick' farming	2(d)
1	22.1.1	Although this comment is probably correct, it must not be used to argue the point that all the vegetation in south-west was burned very frequently only because the area was occupied and managed by Aboriginal people. Not all areas were occupied and/or burned by Aboriginal people. It also appears that even in areas which were regularly occupied and burned, fire regimes applied by Aboriginal people varied significantly, with some areas being burned very frequently, while others were burned very infrequently or not burned at all. This is reflected in the diversity of flora and fauna in the area. Many species require different fire regimes, with some requiring long unburned vegetation	Noted	2(a), 2(d)
1	22.1.1	I will not enter the argument about the validity of the grass tree fire scar research (p63). I am happy to see Hopper's suggestion acknowledge that caution is required before inferring landscape-scale burning from Aboriginal firestick farming from fire scars on individual trees and colonial diaries from untrained observers	Noted	2(a), 2(d)
1	22.1.1	The suggestion of untrained observers is not only irrelevant by also incorrect. How much training does it take to tell if something is burnt or not? The reports from these settlers, Government officials, Explorers and Surveyors are in their hundreds. Were they all totally incompetent, deluded or given to fantasy? Were botanist John Drummond, Baron Ferdinand Von Mueller, Captain Bunbury and surveyors untrained? As far as references to grasses are concerned there are botanical names such as Poa and Stipa recorded, among others	This is Hopper's view. The draft is presenting both sides of the debate	2(e)
1	22.1.1	Your reference to Hopper is merited in terms of caution being required in assessing the evidence, but I do object to the reference to untrained observers. In fact, their naivety augments the evidentiary value of their observations as they reported what they observed instead of refusing to accept the visible evidence of burning by Aborigines	As above	2(e)
1	22.1.1	I'm not aware of any research that bases its conclusions on the fire scars of an individual tree. While caution is important in all interpretations, it would be most unwise to be dismissive of the grasstree fire scars, particularly in the light of significant corroborating evidence with regard to historical fire occurrence. Historical, traditional, anthropological, dendrochronological and palaeontological	Noted	2(d)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	22.1.1	The historical references are numerous in many cases specific, and compelling. It needs to be remembered they were documented by people who were actually there; not sitting in a laboratory, greenhouse, university or office nearly 200 years after the event. I would suggest that the documented observations of the people who were there, carry significantly more authority than the opinions of those who weren't	Noted	2(d)
	22.1.2	Post-European Settlement		
1	22.1.2	It is heartening to read the statement that conditions have changed to such a degree that "the application of historic fire regimes may no longer meet biodiversity conservation objectives". In no way, however, can Aboriginal burning practices even "contribute to the development of ecologically-based fire regimes at a landscape level" in the Shannon and D'Entrecasteaux National Parks. Lines 44-45 should be omitted	This "traditional" fire regime helped deliver the conservation values within the parks. There is increasing anecdotal evidence of the ecological benefits of regular introduction of fire into some areas. Research efforts such as the fine grain mosaic project at Walpole will confirm the benefits of developing an ecological fire regime on this basis	2(a), 2(e), 2(g)
1	22.1.2	"application of historic fire regimes may no longer meet biodiversity conservation objectives" This has not been demonstrated nor is any observed or demonstrated reason been given here to indicate that it is so. This is simply an opinion. How many towns and cities are there in D'Entrecasteaux or Shannon National Parks. As the latter part of the evolution of these plant communities was at least partially in response to traditional burning regimes, it is equally legitimate, more logical and more scientific to argue that to not apply traditional burning regimes may result in failure to reach biodiversity conservation objectives. Even if those regimes not now or at some future time require a degree of modification (i.e. periodicity or seasonal variation) as a result of climate change. However, this is yet to be demonstrated. With this in mind it should be recognised that changed climate, plus untested changes to fire regime may well be the combination that proves to have serious consequences for biodiversity	As the draft states much of the flora and fauna of the south-west have been affected by the clearing and development of towns, industry, tourism and roads etc. Please note that the pressure of development doesn't need to be within the parks. That is, the threatened species that occur within the parks are not threatened necessarily because of the development within the parks but persist there as their habitats have been destroyed elsewhere in addition to Europeans introducing animals, weeds and diseases into their habitats. Therefore the parks need to be managed in the context of wide-scale European disturbance of the south west land division and as stated the application of historic fire regimes may not be appropriate given the consideration of these additional pressures would not have existed prior to "settlement"	2(e)
1	22.1.2	p63, para 7. The social and cultural changes to the landscape referred to have, in the most parts of the State, precluded the consideration of historic fire regimes. Most of these social and cultural changes have not occurred in the planning area. The tenor of the paragraph should change to reflect the possibility that historical fire regimes may be appropriate	As above	2(e)
1	22.1.2	"and it would be inappropriate to try to restore traditional fire regimes" There is no logic, rationale or science presented here. This statement has no demonstrated basis. Fire management has far more important guiding principles than opinions	As above	2(e)
1	22.1.2	The proposal that the management of the Aboriginal and early stockmen is no longer appropriate because of "cities, towns, private property, cleared land and weeds" is highly flawed and suggests reasons to sustain an ideological view. Because of its location and largely remote locale there is no reason why the regular burn regime could not be reintroduced	As above, society and the landscape within which we live have changed considerably since the exploration and settlement by Europeans, and fire management today has to take this into account in in developing appropriate ecological fire regimes and protecting the key values of the parks	2(e), 2(g)
1	22.1.2	These grasslands and the associated biodiversity were the result of previous indigenous management. The Department has a legislative responsibility to maintain biodiversity and this aspect of biodiversity can not be considered to be exempt. To fail to maintain this component of biodiversity would be an abrogation of this responsibility. It is recognised globally that native grasslands are maintained by fire or grazing (personal communication T D McFarlane)	As above	2(e), 2(g)
1	22.1.2	p63, para 7. I don't see why it would be inappropriate to restore Aboriginal fire regimes in parts of the park. Your position would seem to conflict with p5 (Aboriginal landscapes as a key value)	As above. Aboriginal landscapes refer to cultural sites	2(e), 2(g)
1	22.1.2	Also, compare "and it would be inappropriate to try to restore traditional fire regimes" with first key point in text box P118	The traditional hunting and gathering referred to in section 31 does not include applying burning practices, this has been clarified in section 31	1(e)
1	22.1.2	The burning of forests by early European settlers in particular is not indicative of indigenous fire management practices, and should not be construed as an endorsement of current prescribed burning programs	Noted	2(d)
1	22.1.2	I am concerned that the statement that the cattlemen mimicked what they believed to have been the traditional burning methods of the Aboriginal people (Ipsen 2000) was not qualified. It is unlikely that the cattlemen fully understood the burning and land management practices of Aboriginal people, who most likely applied fire regimes to some areas to meet certain objectives other than grazing (e.g. fauna habitat/shelter, wood for spears, etc). Furthermore, it is likely that the objective of cattlemen was to create young growth for cattle across a large area. This is most likely significantly	Noted	2(a), 2(d), 2(h)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
		different to the fire and land management objectives of Aboriginal people		
	22.1.3	Recent History		
2	22.1.3	The so-called fire history map in the DMP (Map 7) is useless. It is not a fire history as it only shows the time since last burn in blocks of five, ten or 20 years and it is far too small to provide any meaningful information	The map is one way of showing the fire history information, the raw data contains finer detail i.e. actual year burnt, but if shown in a map for the parks would be outdated sooner than the summarised map	2(d)
1	22.1.3	Map 7. The legend box should be titled "Area Treated with Fire"	This would not make sense, the map shows both wildfire and prescribed burning results	2(g)
1	22.1.3	Map 7. It would be more meaningful for the reader if the polygons representing area treated with fire were shown as some form of patchy stipple. The intention is to indicate that the areas that are treated with fire are 'patchy' in terms of burnt and unburnt. As it is represented at present, the reader is given the impression that the entire area is burnt out	A note will be added to the map	1(e)
1	22.1.3	Map 7 shows that large parts of the parks have recently (0-5 years) burned. This is of great concern, both in relation to the size of the fires/burns (loss of individuals within species or loss of species and the ability of individuals or a species to recolonise a burned area), but also in relation to the overall and/or average vegetation age and its spatial distribution within the parks	This was due to wildfire arising from lightning as per Table 5	2(b)
1	22.1.3	Only relatively small areas have remained unburned for a longer period of time (21-42 years). It appears that long unburned areas are not distributed across a wide range of vegetation communities and/or habitats. This is a significant issue which must be addressed in the management plan. Unfortunately, the DMP does not specifically address the need to retain some vegetation in a long-unburned state, nor does it identify and set aside areas which should remain unburned during the 10 years the plan will be in operation	Applying the principles stated in Appendix 9 and the conceptual ecological regime model (Figure 8) will result in some areas remaining unburnt for extended periods	2(d)
1	22.1.3	Please note that map 7 shows the fire history to 2002/2003. Fires that may have occurred during 2003/04 and 2004/05 are not included. It is, however, possible that no major fires have occurred during this period	The 2004/2005 season was not finished when the plan was published and the previous year's info had not been collated. Map 7 will be updated for the final	2(d)
1	22.1.3	Information on past fire regimes is not provided (i.e. how often were different areas burned over a given period - say since 1950). This is a major shortfall and does not allow for well informed decision making	A management plan is designed to establish strategic direction and not detailed information required for fire management. This is best covered as part of the Master Burn Planning process	2(c)
1	22.1.3	p63, Para 8. The reference to fires caused by escapes from prescribed burns should be deleted. It focuses the reader's attention on one relatively minor fire cause and infers (wrongly) that prescribed fire is 'bad'. This information is already presented in a full and balanced context in the tables and the associated text	The text is appropriate as the issue of escapes from prescribed burns is often brought up in the public arena	2(d)
1	22.1.3	A comment at the bottom of page 63 is of interest: Over the last decade, there have been a number of escapes from prescribed burns, but these have generally been kept to a small size by quick suppression action (Table 5 Wildfire Causes in the Parks 1989 to 2001). The terms "generally" and "small size" should be seen in the context of Table 5. Three escapes from prescribed burning in 97/98 burned 4,650Ha, one escape in 93/94 burned 2,040Ha and another in 91/92 burned 3,500Ha. Overall, there were eight fires as a result of escapes from prescribed burning during the period 1990 to 2003, only 3 of which were contained to below 500Ha. These figures do not, in my view, represent escapes that are "generally contained to a small size". Furthermore, they reflect very poorly on CALM's capacity to safely and effectively conduct prescribed burns	The table shows that escapes from prescribed burns accounted for 15% of the areas of wildfires within the parks over a 15 year period which given the remoteness of the parks and inaccessibility of many areas is considered generally a small size. However the text will be updated and clarified	1(e)
1	22.1.3	The statement that a number of escapes from prescribed burns have been kept to a small size is not supported by Table 5 on p 64. 10,810 Ha were burnt as a result of escapes from CALM burns between 1989 and 2004, compared with 6332Ha from deliberately lit fires. That these "deliberately lit fires are of particular concern" to CALM (p64 line 9) appears contradictory to the description of the size of the escapes as "small"	The draft states that the high number of incidents of arson is a concern, as opposed to the area resultingly burnt. Arson indicates negative behaviour towards the parks and has the potential to be very destructive to the conservation values of the parks if not contained early and effectively. The final will clarify this	1(e)
1	22.1.3	Change terminology of CALM management fire escapes to differentiate natural (lightning) bush fires from feral fires (escapes)	Terminology is clear	2(g)
1	22.1.3	It is interesting to note that tables list wildfires only and does not list the areas which were prescribed burned since 1990. This is a major shortfall and does not allow for well informed decision making	Prescribed burn information is used in the Master Burn Program and the fire history map shows history of fire including prescribed burns. As you point out the management plan is just highlighting wildfire history of the parks in the table	2(d)
1	22.1.3	Table 5. The last number in the total column is 3 not 1. The total is correct	Noted	1(e)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
	22.2	Fire Ecology		
1	22.2	Fire ecology can not simply be defined in terms of biology of species. It is the point where biological science and fire science meet. Parameters of both sciences must be recognised and understood if a genuine comprehension of fire ecology and sound environmental management are to be achieved	An introduction to the fire ecology section has been provided in the final plan	1(e)
1	22.2	Since rising water tables can affect vegetation through waterlogging, the impact of fire on water tables must be researched and taken into account in the development of the fire management plan	Strategy 8 in the management plan provides for research	2(a)
1	22.2	The plan incorrectly argues that past fire frequency must have been longer than historical data suggests because "fire-sensitive species still exist". This denies the well-known fact that the shorter the fire-interval, the milder the fire and the greater the likelihood of patchiness and longer 'interval' fire return times. Longer rotations will have exactly the opposite effect, as heavier fuels accumulate and fires are more intense and less likely to leave unburnt areas	The draft plan does not state this. P65 of the draft plan indicates that sustained, high frequency burning or infrequent but large, intense fire regimes are equally damaging to biodiversity values	2(g)
3	22.2	Fears about "threatened species" are grossly exaggerated. These species would not be there today if they had been unable to survive a regime of frequent mild fire for centuries. The people who have come up with these restrictive fire management proposals seem to have little experience of the area or appreciate its past history	The Department is legally obligated to protect threatened species and their protection is considered in preparing Master Burn Plans. Inappropriate fire regimes are a valid threat to threatened species and many threatened species are now restricted in range which in many cases is related to where there are less fire prone habitats or long unburnt habitats	2(g)
3	22.2	Even if required to provide special treatment for so-called threatened species, coastal areas require frequent low intensity prescribed burns, not infrequent high intensity wildfires. Such burns will result in a more patchy burn result, which will protect many of the threatened species which usually occur in moister situations. Areas left for too long before prescribed burning - say 7 years - will burn with too much intensity and burn right across the landscape, including wetlands and granite outcrops, without leaving unburnt sections for fauna requirements, etc. We don't want repeats of the 1988 fires with the extensive resulting damage	The fire sensitive and threatened species and communities are of most concern in managing fire, and application of fire at an appropriate scale, season, intensity and frequency will ensure that unburnt patches remain	2(d)
1	22.2	I note that the high incidence of fire over the past century has been a major reason for the loss of biodiversity in the South West. The protection of critical weight range mammals, for example, is dependent on a reduction in fire events. Many small mammals die when they are trapped between a river and a fire front. Fire is also known to be a vector for phytophthora and weeds and a significant cause of erosion. Generally speaking, the more frequently an area is burned, the greater the risk of subsequent fires as a result of rapid undergrowth development	Noted	2(a), 2(d)
1	22.2	I refer the reader to the symposium held in 2001 called "Fire in South West Ecosystems" and hosted by CALM	Noted, the draft plan references this symposium several times	2(b), 2(d)
1	22.2	Table 6. To this table must be added "Resprouters with a long recovery period". It appears that no research has been done on this subject in WA. In NSW, however, research has shown that one species, <i>Isopogon anemonifolius</i> , takes 13 years to become fire tolerant (Bradstock, R.A. and Myerscough, P.J. (1988)). "The survival and population response to frequent fires of two woody resprouters <i>Banksia serrata</i> and <i>Isopogon anemonifolius</i> ," Australian Journal of Botany, Vol. 36, pp. 415-431)	Table 6 is from a cited reference and it is inappropriate that it be changed without the endorsement of the author, your comment has been forwarded to Dr N Burrows for his information	2(h)
1	22.2	P65 L9. Italics please for plant genus <i>Kennedia</i> and <i>Banksia</i>	These words are part of the common name not scientific name	2(g)
1	22.2	P65 L14. There is no mention of understorey plants flowering within 3 years of fire in the cited reference of Burrows et al (1995). Incorrect reference	Reference has been changed to Burrows and Friend (1998)	1(e)
1	22.2	The DMP does not clearly articulate whether it is appropriate to apply a minimum period of 3 years since fire, after which the majority of understorey plants on upland high rainfall jarrah forest sites flower, and whether this figure includes doubling the juvenile period (which is defined as the time when at least 50% of the population has reached flowering age). My "gut feeling" is that the 3 years refers to the time plants take to flower and that doubling the juvenile period gives us 6 years. The same uncertainty applies to the figures listed in relation to species on low lying sites, which appear to take longer to flower after the fire	You are correct, the JP is 3 years, and 2JP is 6 years. The figure will be replaced with the current figure being used in management plans anyway	1(e)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
2	22.2	p65 states "Of the 17 species known to have juvenile periods longer than 3 years within the south-west, 10 of these occur within the parks (Burrows et al. in prep). On low lying sites such as gullies and broad valley floors, some species may take six to seven years to flower after fire. This has implications for prescribed burning - on the basis of current knowledge, doubling the juvenile period (which is defined as the time when at least 50% of the population has reached flowering age), of the slowest maturing fire sensitive species to allow for the replenishment of seed banks, provides a minimum interval between fires that are lethal to adults of that species". Other research indicates that the minimum interval between fires lethal to adults of that species should be two and a half to three times the juvenile period, not just twice (Hopkins, A.J.M. and Griffin, E.A. 1989). Fire in the banksia woodlands of the Swan Coastal Plain Journal of the Royal Society of Western Australia Vol. 71, pp 73-74)	Based on the literature such as Burrows and Wardell-Johnson 2003 and Burrows 2008, somewhere around 2 x Juvenile Period is considered reasonable	2(d)
1	22.2	I note that some critical weight range mammals are declining because of a growing shortage of suitable nesting sites. Many mammals (and some birds) will only nest in hollow logs and dead standing trees. These types of nests are often destroyed in fires and there is not sufficient time between fires for new logs and hollow trees to form. I would therefore recommend that areas be set aside from the prescribed burning program so that critical weight range mammals can develop a sustainable habitat without undue disturbance from fire	Some of your concerns are addressed in the Department's Fire Management Guideline for Black Cockatoos which includes the use of mosaic and low intensity prescribed burning. Some more intense fire behaviour in small patches within prescribed burns contribute to dead and decaying limbs burning out and forming hollows. The final plan will include more detail of fire management in old growth forests	1(e)
1	22.2	P65 L29. More should be added under impact of fire on fauna: recent data from Friend and Wayne (2003). Recent data on the impact of fire on the Honey possum Tarsipes rostratus (Everaardt, 2003) should be included in Figure 7. Maximal abundance of this marsupial requires about 30 years after fire. Ref: Everaardt, A. (2003). "The impact of fire on the Honey possum, Tarsipes rostratus, in the Fitzgerald River National Park, Western Australia. PhD Thesis. Biological Sciences, Murdoch. Perth. Ref: Friend, G. and Wayne, A. (2003) "Relationships between mammals and fire in south-west Western Australian ecosystems: what we know and what we need to know. in Fire in Ecosystems of South-West Western Australia: Impacts and Management. (ed. Abbott, I. and Burrows, N.) pp 363-380. Backhuys, Leiden	Figure 7 is from a cited reference and it is inappropriate that it be changed without the endorsement of the author. Figure 7 is sufficient to demonstrate the argument for the purposes of a management plan without other references being needed. Please note that Friend and Wayne (2003) states that the honey possum in high rainfall areas takes about 10 to 15 years to reach maximum population density	2(d), 2(h)
1	22.2	Figure 7 provides an indication that vegetation communities should be maintained at around 20 years. If this approach is based on a mosaic of interlocking vegetation ages, younger vegetation would be available for grazing for the Western Grey Kangaroo and Brush Wallaby, while older vegetation provides for the Quenda, Mardo, Quokka, Tamar and the Brush- and Ringtail Possums. However, it must be remembered that this is a simplistic approach based on a few species. It does not, for example, include habitat requirements for Mallee fowl. It would also be inappropriate to manage vegetation ages based on only maximum abundances of particular species	Noted, the aim is to provide a range of vegetation ages	2(a)
1	22.2	On p67 the paragraph fourth from the bottom of the page beginning "This information..." should be highlighted in bold as this is the crucial issue for fire management in any vegetated landscape. There has to be a balance of ecological, safety and property values. With skilful planning these need not be mutually exclusive	The management plan format is standard for all similar planning areas and placing specific words in bold is not appropriate. Noted, the Department has a legal and moral responsibility to conserve biodiversity as well as protect life and community assets	2(a), 2(c)
1	22.2	Also in the fourth paragraph from the bottom of p67, after "public risk" add "(including the safety of visitors and fire fighters)"	Noted	1(e)
1	22.2	The Shannon NP contains some lovely old growth karri stands, some of the finest around (the reason they were put in reserves well before the time of CALM). In those days we used to burn these areas regularly, so as to minimise the threat of wildfire damage. The lovely stands in these areas which everyone admires are a product of this management. In recent years this has been forgotten and the advocates of no burning, or of very long periods between burns have become influential. Amazingly, their views are based on a total misunderstanding of what is going on	A section on old growth forest in the Fire Ecology section has been added to clarify the Department's position. Old growth forest (the tree component) is a fraction of the natural seral progression and will collapse and regenerate in time. Fire may or may not be a contributing factor to this change of state. For the last 20 years at least, as prescribed by the previous management plan these areas have been protected by short-rotational burns adjacent to the karri regrowth stands and burnt either as Forest Protection burns, Park Protection burns or Flexible Management areas so the Department is unsure to where the idea has come from that the regrowth areas are "no planned burn" areas. However there is only a limited window for prescribed burning in karri which sometimes interferes with the burning program	1(e)
1	22.2	Aesthetics. What most visitors to the karri forest like is tall beautiful trees with green leafy crowns and an understorey ablaze with wildflowers such as clematis, crowea, hardenbergia and scarlet runner. This scene is the outcome of regular burning. What people do not want to see is dead trees, or a forest of stags underlain by thickets of impenetrable karri wattle or water bush - this scene is the outcome from raging high intensity fire	As above	2(d)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	22.2	Recommendation: It is time for the Conservation Commission to come clean about protecting biodiversity. Show some leadership and make a simple statement along the lines of the above points. It is time to come out against large high intensity fires on the grounds that they damage biodiversity as well as destroying the well-loved aesthetics of the karri forest. Stop trying to make management so complex!	As above	2(d)
1	22.2	The other stands of critical importance are the karri islands of D'Entrecasteaux. These beautiful areas were also once regularly burned but these days appear to have been abandoned and left to fend for themselves. It is the greatest folly to burn the flats but to leave the forest islands unburnt. The endpoint of this is forest islands with very heavy fuel loads, and one day a fire will run into them and cook them. It is also risky to burn these areas in the autumn when all forest fuels are totally dry. The coastal areas can only be burned in late spring with several lightings, progressively moving into the jarrah and karri types as they dry, and burning under mild conditions. The management plan does not give the impression that this is understood but experienced CALM staff do know all this	Noted. The Department is aware of this issue and it will be considered during the planning and implementation of the annual prescribed burning program. Some of the forest islands will be future fauna translocation sites (long unburnt) and some will be burnt. The fire regimes for these areas will be based on the concept of regular introduction of fire to create a patch work of burnt and unburnt patches	2(d)
2	22.2	Islands of karri (and surrounded by 'flats') both mature and regenerated (from past fires or prescribed burning) that are carrying high fuel loadings are at serious risk of severe damage from wildfire	As above	2(d)
3	22.2	Old growth karri in Shannon area, plus karri islands on flats must be protected from wildfire. Ground fuel on karri islands should be burnt every second rotation to protect them from wildfire event	As above	2(d)
1	22.2	The optimum burning cycle to ensure effective damage mitigation for old growth karri forest is about 6-8 years. Each burn needs to be lit several times to ensure the different karri ecotypes are burned, as they dry out at different rates. Incomplete burns are a recipe for disaster	The burn cycle will vary as per the information provided in the final plan on old growth forests	2(d)
1	22.2	Our recommendation: Karri forests in these two parks must be fuel-reduced by prescribed burning on a 6-8 year cycle, using spring-early summer burns. Protection of the karri islands in southern Shannon and D'Entrecasteaux requires special treatment in the plan and detailed prescriptions to ensure their long-term survival	As above	2(d)
1	22.2	There is no mention of the frequency of burning cycles desirable in high forest	As above	2(d)
1	22.2	Under this draft plan, in the D'Entrecasteaux National Park, the only fire regime that will not be represented is the one that was the most common in pre-European times and which is essential to maintain the savannah grasslands, once common in the park, but now almost absent. They are also the most endangered community types in Australia. Not only will the frequent fire regime not be practiced on a management scale, the draft plan makes no mention of even attempting to undertake it at a demonstration scale	A section on savannah grasslands in the Fire Ecology section has been added to clarify the Department's position. There is a current operational trial burning regime for grasslands in the area west of Broke Inlet	1(e)
1	22.2	One large high intensity fire is all that it takes to destroy a savannah and replace it with a thicket - to return it to its previous condition is likely to take at least a hundred years of careful low intensity burning. A fire management plan that makes no provision to maintain the savannahs and indeed provides every condition to promote their destruction, is unacceptable and must be modified	As above	1(e)
1	22.2	The declaration of the D'Entrecasteaux National Park and the withdrawal of regular burning has led to the virtual extinction of the savannahs south of Deeside Rd and along to Broke Inlet. They were the last remnant of this type in southern WA. (It is interesting to speculate that if the extinction of an entire and unusual ecotype in southern WA had resulted from logging, rather than from withdrawal of frequent fire, every greenie in the country would be slitting their wrists over it)	As above	1(e)
1	22.2	Some people (the usual suspects) are now saying that this extinction is a good thing, and that the savannahs were "an artefact" of Aboriginal and European miss-management. The Management Plan almost comes out and says this very thing. This is a pathetic justification for a terrible outcome	As above	1(e)
1	22.2	We accept that CALM are trying to do the right thing, based on bad advice, but they now should admit they were wrong. What is needed is a concerted effort to recover the lost savannah ecosystem and this can only be done by increasing the frequency of fire. The great irony is that if this ecotype still existed today, CALM would probably declare it a threatened community!	As above	1(e)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	22.2	Our recommendation: The Conservation Commission must prescribe a two-yearly burning cycle for all areas identified as the former savannah grasslands	As above	1(e)
1	22.2	There is no mention of the need for frequent low intensity burning of the coastal areas to re-establish savannah grasslands	As above	1(e)
1	22.2	Explosion of kangaroo numbers on agricultural land indicates the dense state of our coastal strip - no feed in national parks	Noted	2(c)
	22.2.1	Coastal Woodlands		
3	22.2.1	Areas such as Coodamurrup, Yeagerup, Quannup peppermint woodlands and associated savannah grasslands (and any others identified) should have a special management plan prepared for their restoration and protection. Then recreation opportunities will be available in these areas when greatly increasing numbers of campers want to use them. The structure of these stands is just as important as diversity and species composition	As the draft states, further research and adaptive management experimentation is required to determine the most appropriate fire regime for the coastal woodlands p66. A Fire Management Guideline has been produced by the Department for the South West Coastal Plain which includes objectives and strategies for the heaths, woodlands and grasslands of the coastal landscapes between Augusta and Denmark. More detailed fire planning is provided in the Master Burn Plan, which provides for maintaining a diversity in fuel ages as well as the protection of community assets and is available to the public. A management plan is designed to establish strategic direction and not detailed annual burning program, however some detail from the Fire Management Guideline will be included in the final plan	1(e), 2(d), 2(g), 2(h)
3	22.2.1	There will also be further destruction of the much reduced existing peppermint woodlands, which have taken a hammering from wildfires over the past twenty years. The plan give no attention to the need to protect a large area of yate regeneration resulting from the 1988 wildfire which, if not properly protected by very careful fuel reduction processes this will be destroyed by wildfire. As most of the mature trees from which the seed of these plants was shed are now dead (killed by the 1988 fire) the death of these young plants will effectively mean the loss of the yate communities in this area	As above	2(d), 2(g), 2(h)
3	22.2.1	The yate forest (and many mature peppermints in woodlands) that this fire killed, was well over 150 years old. This obviously means that it was the worst fire in that time. A change in management to maintain fuel (dead and near dead understorey) vegetation quantities to reasonable levels (with the necessary precautions to protect declared floral species) is essential to protect similar areas	As above	2(d)
1	22.2.1	Long fire intervals in the coastal environment has been demonstrated to have severe impact on some components of the biota. Nuyts wildfire 2001 caused greater than 60% mortality in grasstrees, Xanthorrea preissii in longer unburnt areas with no subsequent seedling requirement. Mortality of the same species in Quarram (also long unburnt) resulting from a wildfire 2005, was a documented at 70,2% in yate (Eucalyptus cornuta) stands. Lower but still high in adjacent heath. I am happy to supply data if requested. This species is not normally expected to demonstrate mortality from fire (Pers Comm, D Ward.). I have personally reported the local extinction of two sub-populations of Dryandra sessilis var. cordata (a coastal species) following fire, subsequent to long fire intervals (1999,2001)	As above, the draft does state extreme regimes, such as ...infrequent but large, intense fire regimes, are more likely to be the most damaging to biodiversity values	2(d)
1	22.2.1	Over the last 20 years there has been a significant deterioration in the biodiversity of the D'Entrecasteaux national park. Around 80% of the Peppermint woodlands and Yate forest have been destroyed by wildfire. The draft management plan does not recognise this fact and has no specific plan to safeguard the remnants of this forest	As above	2(d), 2(g), 2(h)
1	22.2.1	Not only are the grasslands now virtually gone, but the old remnant peppermints are now being subjected to irregular high intensity fire, rather than frequent low intensity fire - with a result that the old veteran trees, many of which are 100s of years old, are burning down, to be replaced by an even-aged regeneration of peppermint thickets	As above	2(d), 2(g), 2(h)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	22.2.1	P66 L9. The Scott Coastal Plain, occupying approximately 58% of the parks has a very high level of biodiversity within the south-west of Australia (Hopper & Gioia 2004). The DMP makes reference to the lack of detailed fire research on plant communities within these areas. The DMP also acknowledges the lack of detailed information on the extent of the fauna of the region (p32 Sec. 17). Surely the actions implied in the statement "adaptive management experimentation is required to determine the most appropriate fire regime for these coastal woodlands" (L15) is a risky way to proceed. There needs to be full account of the extent for the flora and fauna within the region before responsible management is undertaken. Ref: Hopper, S.D. and Gioia, P. (2004). The Southwest Australian Floristic Region: Evolution and Conservation of a Global Hot Spot of Biodiversity. Ann Rev of Ecological and Evolutionary Systematics. 35: 623-650. These ecosystems have evolved under the stochastic occurrence of wildfire, and it could be argued that these may be nature's best managers	As above. In addition, the "coastal woodlands" do not correspond to the "Scott Coastal Plain" and as such do not occupy 58% of the habitat of the parks. Also the draft states that "research" as well as adaptive management experimentation is required	2(d), 2(g)
	22.2.2	Wetlands		
	22.2.2	Indicate to some extent the extreme loss of organic soils in the national parks of south west of Western Australia i.e.: Lake Surprise, exposed root base following 2002 fire. Loss of organic soil is clearly indicated, June 2003.; Melaleuca preissiana grove, Karrara Block adjacent to Durham Road. Given its location on Durham Road the burning of this tiny Melaleuca grove was unnecessary; Goblin Swamp, showing exposed Melaleuca bases, Dec. 1997	More information on fire management for wetlands and importance of peatlands will be included in the final plan	1(e)
27+3	22.2.2	The parks, including the Lake Jasper area, should be zoned for wildfire risk management, with clear objectives for each zone	More information on the management of fire in wetlands will be included in the final plan, using information in the Department's Fire Management Guideline for peatlands, the Department's Wildfire Threat Analysis will also be discussed	1(e)
27+3	22.2.2	Wildfire mitigation and management must take account of the sensitive vegetation types around Lake Jasper	Noted, as above	2(a)
27+4	22.2.2	Areas near Lake Jasper should also be considered as candidates for Scientific Reference Areas especially those that have not been burnt for 10 years or more	There is a Fire Exclusion Reference Area in the Gingilup Swamps Nature Reserve which covers part of the Gingilup-Jasper wetland system	2(d)
1	22.2.2	Prescribed burning regimes developed for forested ecosystems are not appropriate for other vegetation types, especially wetlands and damplands such as occur around Lake Jasper. There is a serious over-emphasis on forest in the DMP when only about a fifth of D'Entrecasteaux National Park is forest	The wetlands have their own management regime to maintain habitat and biodiversity. Prescribed fire ignitions are planned for periods of the year when organic soils are "wet" and won't ignite - to ensure there is minimal loss of peat and organic soils. The Department's Fire Management Guideline No. E1 for organic rich soils (peatlands) states that the fire management objectives for organic soils is to specifically protect organic soil habitats from wildfire and avoid ignition of organic solids as a result of prescribed fire operations. In addition Fire Management Guideline No. E3 for habitat protection (birds) within reeds and rushes contains guidelines for protecting reed/rush habitats. The final will be updated to include reference to the various fire management guidelines which were developed in 2007	1(e)
1	22.2.2	It is my opinion that wetland habitats should never be included in prescribed burns and in particular that peat hole wetlands should never ever be burnt. Wetlands are the kidneys of this planet, they are carbon sinks and water reservoirs, burning them is ecologically irresponsible. Never include wetland habitats in prescribed burns	As above	1(e)
1	22.2.2	The DMP for the parks does not offer practical solutions for fire management in coastal wetlands for the next 10 years. This is a major shortfall that must be rectified	As above	2(h)
1	22.2.2	Protection of peat will require the fire/landscape burn programs to be considered in much smaller units than CALM has used thus far. In future it is important to assess the burn area at the scale of peat swamp by peat swamp. Also crucial is the measurement of the organic content of soils between peat swamps to assess the danger of widespread organic soil loss. Units of 500 to 5000Ha are totally unacceptable	As above	2(h)
	22.4	Reduce burn areas and burn plans to accommodate preservation of remaining peat	As above	2(d), 2(h)
1	22.2.2	Peat loss was originally started by cattle damage and fires lit by Manjimup graziers which has been continued through CALM's broadscale use of fire in peat lands. My personal estimate for volume of peat loss for the Doggerup system alone could be as high as 126 million cubic metres	As above	2(b)
1	22.2.2	CALM has used fire inappropriately in the peat lands and henceforth fire must be excluded from peat areas	As above	2(d)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	22.2.2	The doggerup peat acted as a sponge and slowed the drainage in this area. The former slowing of drainage is indicated in a conversation between Bill Ipsen and Charlie House where the drying of formerly summer long fresh water springs at the coast is recorded. The obvious correlation between low canopy forest loss, fire and loss of peat with loss of fresh water on the coast was not made. Peat loss is irreversible given the current vegetative assemblage and drying climate	As above	2(b)
1	22.2.2	Other recent tragedies are the losses from the fire on the Pingeup Plains to Broke Inlet and in the Walpole Wilderness Area the loss of Lake Surprise from the Northumberland Block fire and the fire in Karara block which destroyed the tiny Melaleuca preissiana swamp adjacent to Durham Road	As above	2(b), 2(c)
1	22.2.2	Reedia is poorly adapted to frequent fire regimes. Whereas damage by wildfires cannot be easily prevented or controlled, prescribed burns should never be carried out in Reedia colonies. Each colony should be protected prior to prescribed burns by a peripheral firebreak, as was successfully done recently at the Angove Road Reedia colony	As above. Frequent fire is mentioned the draft as one of the threats to the <i>Reedia</i> community	2(d)
1	22.2.2	p67, Para 2. By removing the covering organic soil layer, fire can potentially accelerate.... As it currently reads fire itself has some direct mechanism to oxidise iron sulphides	Noted	1(e)
1	22.2.2	I believe evidence exists to suggest that Doggerup Plain and possibly other D'Entrecasteaux wetlands, was a low canopy forest of Warren River cedar Taxandria (Agonis) juniperina and associated species in high organic content soil. The T juniperina and the peat generally up to 0.8m higher than present levels, maintained a wetter environment than now exists. This wetter environment protected the peat from desiccation and ignition. Evidence is in the peat pedestals in this area, the remains of former A juniperina root bases and the juvenalisation of remaining A juniperina. If Aboriginal burning practices in this area caused peat to burn there would be no evidence of peat pedestals or recent T juniperina root bases by now	Noted and the draft mentions the impact of climate change on some wetlands on p66 as well as the Department's Fire Management Guideline for Organic Rich Soils mentioning "unprecedented drying" of peatland systems	2(d), 2(h)
1	22.2.2	Protect all relictual T juniperina and peat from any fire and re-establish A juniperina wherever possible	The final plan will include more information from the Department's Fire Management Guideline for Organic Rich Soil and areas will be rehabilitated with Agonis juniperina as appropriate	1(e)
1	22.2.2	With the loss of organic soils there is the loss of edaphic fire control through the loss of the action detritivores. Edaphic fire control is highly complex issue which deserves research and investigation regarding the possible re-introduction of detritivores to a partly restored environment	Noted	2(h)
1	22.2.2	Peat in the south west is often stratified into fibric peat, the top layer where the original plant matter can be to some extent identified; Sapric peat, the lowest layer where the original material has decayed beyond reasonable recognition; Hemic peat, a transitional zone between fibric and sapric peats (Horwitz, P et al 1999)	Noted	2(b)
1	22.2.2	The values of peat are: It acts like a sponge slowing the flow of water through the landscape (Horwitz, P 1999); It protects the roots of trees like Taxandria juniperina and Melaleuca from desiccation; It forms an anaerobic barrier which protects underlying iron rich soils containing ferrous sulphide/iron pyrites/acid sulphate soils from water and oxygen which results in the production of sulphuric acid. (Hinwood A)	More information on the value of peatlands will be included in the final plan, although most likely to be within Section 18	1(a)
1	22.2.2	The proposed management burn in DP314 be deferred until a full assessment of relictual organic soils is undertaken and the burn size reduced to accommodate the danger of further loss of organic soil	Comments on individual burns should be discussed with the District when the Master Burn Plan is available for public comment. However, your comment was forwarded to the District when received, and it is our understanding that a field visit with you was completed in regard to your concern with actually Burn DP012 - and the burn has now been partially completed	2(c), 2(h)
1	22.2.2	I understand there are no "property rights" to be protected and I therefore request that this burn be deferred until a full assessment of the area is undertaken. I request a field consultation for myself and the Northcliffe Environment Centre to this DP314 proposed burn area	As above	2(c), 2(h)
	22.2.3	Granite Outcrops		
1	22.2.3	The management plan does not provide specific and practical solutions for granite outcrops. This is a major shortfall	Since publication of the draft plan, Departmental guidelines have been produced for a number of habitats including granite outcrops, more detail from these guidelines will be included in the final as appropriate	1(e)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	22.2.3	I wouldn't consider it appropriate to extrapolate from the wheatbelt to the south coastal areas of the D'Entrecasteaux NP. In any case there is a contradiction here. While recognising that edaphic features result in a lower frequency of fire on granite outcrops than the surrounding landscape, the text then goes on to recommend a fire interval "measured in decades" which would compromise the edaphic controls that are responsible for the fire frequency on the granites being lower. This does not make much sense. Intense fire compromises edaphic controls. "Edaphic controls (such as granite outcrops) are weakened by high intensity fire and strengthened by low intensity fire". Jurskis et al. Proceedings of the Australia and New Zealand Institute of Forestry Conference, Queenstown, New Zealand, March 2003	As above	2(d)
1	22.2.3	The relationship between fire on granite outcrops and the surrounding landscape tends to be inverse (as initially inferred in the draft), not direct. Longer fire intervals can lead to fire intensity which results in species being extinguished from areas on granite outcrops as appears to have occurred on Mt Cooke 2003 e.g. Borya sp (pers comm. ND Burrows) and possible local extinctions. Some species not sighted in areas of previous occurrence in the three years following this fire. It is only by having longer fire intervals that edaphic controls are compromised and high mortality of these species occurs	As above	2(d)
1	22.2.3	Longer fire intervals are only considered necessary following lethal fires that are likely to cause 100% mortality of these species (i.e. Mt Hopkins population of granite banksias; Frankland District March 10th 2001, the result of lethal fire) which are then vulnerable to local extinction from extremely dry season (Lamont, BB. Cowling, RM & Enright, J. Proc. Ecol. Aust. 1990 - 16: p.181) insect plague i.e. locusts or subsequent wildfire under extreme wildfire conditions. While the argument presented in the draft demonstrates an understanding of the biology of these species, it demonstrates an equal lack of understanding of fire, fire behaviours and fire dynamics. (see Burrows et al re lethal fire, p 65 para 3 this draft MP)	As above, the draft merely states further investigation is required to determine fire ecology in granite outcrops	2(d), 2(h)
1	22.2.3	Please note that it is possible, or even likely, that vegetation communities on or around granite outcrops are frequently burned during prescribed burns, even though burn prescriptions may have stated that fire in these areas should be excluded or limited. Vegetation on or around these outcrops may be more flammable than the fuels under tree canopies, as they dry out more quickly or their structure (heath/shrubs) may have a higher flammability than fuels under tree canopies. Drying out and increased flammability may be more prevalent on northern aspects. It is most likely that, currently, reporting within CALM is inadequate to identify whether prescribed burns successfully excluded fires from or limited fire within vegetation in granite outcrops. It is possible that CALM continues to undertake prescribed burns without changes to management practices even though CALM staff are aware that these fires continue to burn vegetation communities in granite outcrops. This highlights the need for transparency, adequate reporting and audit, measurable performance indicators and continuous learning, as raised in the submission to the EPA review.	As above, the management guidelines for granite outcrops includes details for monitoring burn operations around granite outcrops	2(h)
1	22.2.3	Fire frequency on granite outcrops is lower than in the surrounding landscape when fire intensity lower (i.e. non lethal fires) and edaphic barriers can be effective "Edaphic controls (such as granite outcrops) are weakened by high intensity fire and strengthened by low intensity fire" Jurskis et al. Proceedings of the Australia and New Zealand Institute of Forestry Conference, Queenstown, New Zealand, March 2003	Noted	2(b)
1	22.2.3	Cattlemen introduced fire into the landscape (where the granite banksia occurs) on a frequent basis for around 100 years. At the end of that period these populations not only persisted, but were apparently robust, healthy multiple aged populations	Noted	2(b)
1	22.2.3	For outcomes in Banksia verticillata (a granite specific species) populations following long periods of fire exclusion see Rare Flora and associated field notes unpublished documentation 2001/2002/2003/2004 (Mt Hopkins population also Woolbales population 2005) Frankland District Office	Noted	2(b)
1	22.2.3	P67, Para 5. Edit - This may also be the case with "flora species associated with" granite outcrops within the parks and requires further investigation	Noted	1(e)
	22.3	Fire Behaviour		

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	22.3	P68, Para 1: Delete - ...The wetlands are generally...mineral earth (firebreaks)... The section addresses fire behaviour in a general sense and indicates that fire behaviour is different between vegetation/fuel types. To focus the last sentences on the wetland component without any reference to specific fire behaviour in the other veg/fuel types seems inappropriate	Will add "For example, wetlands..."	1(e)
	22.4	Fire Management		
3	22.4	The section on fire in the draft plan was almost impossible for even an experienced bushfires specialist to follow. Rotational and operational proposals for specific areas are confusing to say the least. Only a verbal explanation from the Donnelly District Manager and staff at Pemberton gave us the opportunity to glimpse what is proposed in the fire management planning and implementation process. How anyone without a briefing could understand what is proposed is beyond us, as the reality does not seem to reflect what is written in the plan	The management of fire and the need to balance ecological outcomes with protection of life and community assets is a complex issue requiring a structured and formal approach. The complexity of the fire section in management plans is something the Department is constantly trying to refine and improve on. The final plan will be updated to reflect the latest Departmental approach to fire management as well as more information developed for recent management plans	1(e)
1	22.4	p68/69. An asset values and consequences of wildfire table would be good for this section as for WWA	This information would have had to have been included in the draft management plan for public comment, and has been removed from the final Walpole Wilderness plan anyway	2(f)
1	22.4	Fire management policy is needed. A broad-scale burning regime would be a threat to the conservation values of the park. CALM has shown in some areas that it can follow a policy which is less detrimental the bush and this is what is needed	Page 68 of the DMP refers to the draft policy on fire management, this policy has now been finalised. Reference to the Department's policy will be added to strategy 1	1(e)
1	22.4	A fire management policy is needed, drafted with community input. However a frequent large-scale burning regime should be avoided as this would be a threat to the conservation values of the park	The Department's Fire Management Policy No. 19 was updated 2004/2005 after extensive public consultation	2(b), 2(c)
1	22.4	We believe that the fire management is so important and varied that it should be placed in the hands of a specialist group with a demonstrated knowledge of how it can be used and managed to produce a desired outcome	The Department has operational and research staff who specialise in fire management. In addition the Department applies the knowledge gained from other work such as the Bushfire CRC project	2(c)
1	22.4	There is no mention of the differing needs of the two parks	The principles of fire management are outlined which is the same for both parks	2(h)
27+4	22.4	Areas that have not been burnt for a relatively long time are rare and should be maintained as Scientific Reference Areas wherever possible	Noted. The identification and selection of appropriate SRA across the SW has been undertaken by the Department and these areas will be managed accordingly. There are 4 areas in the parks	2(d)
2	22.4	Areas where there has been little fire impact should be isolated; they are increasingly important for scientific studies	As above	2(d)
27+4	22.4	Risk assessment of the whole parks should be conducted by independent consultants to determine the likelihood of a wildfire starting as well as the potential consequences of a wildfire, and hence the need for pre-emptive action	The Department uses a risk management approach when conducting prescribed burns as well as when undertaking wildfire control. The Conservation Commission is the independent body responsible for auditing management plans	2(d)
4	22.4	There must be an independent wildfire risk assessment of the parks	As above	2(d)
1	22.4	There must be an independent wildfire risk assessment of the parks. A fire management plan that prioritises biodiversity and precludes certain areas from being burnt (to provide control areas so we can assess the impacts of burning) must be prepared, with full community participation	As above	2(d)
1	22.4	CALM seems to confuse risk, hazard and threat and likes to reduce the hazard even in remote areas, where the likelihood of wildfire is low, by repeated burning at short intervals when this may be unnecessary and is likely to be harmful to biodiversity	As above	2(c), 2(d)
1	22.4	CALM should implement its February 2000 Policy No. 56, Risk Management, which requires CALM to comply with the national risk management standard	As above	2(d)
1	22.4	The possibility of wildfires must be assessed and planning put in place	As above	2(d)
1	22.4	The likelihood of wildfires must be assessed and planning put in place, always with the view of causing minimum damage to the parks conservation values	As above	2(d)
1	22.4	The COAG report [National Inquiry on Bushfire Mitigation and Management, 2004] makes a number of relevant recommendations and lists a number of relevant findings. It is my view that these were not incorporated into the DMP. This is of concern as the COAG report has been endorsed by the WA Government and provides the most current advice on fire management	The fire section of the draft plan preceeded the release of the COAG report, however the Department's fire management is adaptive to include new knowledge and Government policy and is including the COAG recommendations as applicable	2(h)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	22.4	Finding 6.4 of the COAG Report. " <i>Evidence provided to the Inquiry by Western Australia illustrates the potential for a fuel-reduction program across a relatively homogeneous forested landscape to limit unplanned bushfire boundaries, especially when access via fire trails is good. But many landscapes are much more heterogeneous...The Inquiry is concerned by the dearth of empirical data on the effects of fuel reduction on bushfire behaviour under severe weather conditions and on the reduction of damage to assets. There is a need for a systematic and detailed studies, based on accurate mapping of the spatial patterns of unplanned bushfires in relation to previous fire histories of the land they burnt through.</i> " The above statement may be used by CALM to state that it has COAG support "for fuel reduction across a relatively homogeneous forested landscape". However, the parks are not a "homogeneous forested landscape". Any fire management in the parks must be diverse, to protect and enhance the diversity of the vegetation and fauna in the parks such as vegetation age diversity, including areas which remain long unburned	The Bushfire CRC project is examining a range of environmental attributes in areas that have experienced differing fire regimes over the past 3 decades. The Department is a partner in the project and the knowledge gained from this work and other research will be applied. The management plan applies an adaptive management approach and seeks to retain vegetation age diversity	2(d)
1	22.4	Finding 6.5 of the COAG report: " <i>There is a need to develop ways of assessing the effectiveness of fuel-reduction programs in terms of the resultant degree of reduction in risk</i> " and " <i>Comparing the gross area treated annually in fuel-reduction burning - that is, for a whole agency, region or state - with a published target is not a good basis for assessing performance and is likely to be counterproductive</i> ". These findings highlight that a paradigm shift in relation to the traditional concept of hazard reduction is required. This must be incorporated into the management plan. It has direct relevance as the plan essentially centres fire management on the Master Burn planning process, which is based on the Wildfire Threat Analysis, an outdated and severely flawed "threat model"	The draft plan outlines the new principles for the Department. The SDE draft plan is one of the first plans to indicate the change in policy, with later plans outlining more detail. The Master Burn Plan incorporates the latest Departmental policy as required, and Wildfire Threat Analysis is only one component. The final plan will provide more detail on managing fire for biodiversity conservation	1(e)
1	22.4	Fire Management. 1st para, 3rd sentence. Even though this statement is commendable, it appears that only the terminology has changed and that significant changes to planning and management have not yet occurred. Where CALM has in the past conducted hazard reduction burns, it could be argued that it now conducts the same burns but calls them biodiversity conservation burns	As above	2(e), 2(g)
2	22.4	CALM's wildfire threat analysis must be subject to public consultation as CALM's values are not the community's values	As above. The Indicative Six Season burn plan for the Warren Region (which includes the parks) is provided to community stakeholders for discussion and input each year. The Indicative Six Season burn plan is available for public comment and is posted on the Department's web site and available at local DEC offices	2(g)
2	22.4	The recent national inquiry into bushfire mitigation and management recommended that fire management be applied at the landscape scale, with all land managers and the community involved	As above	2(g)
1	22.4	For example, CALM gives high priority to protecting immature post-logging jarrah and karri regrowth, which many people think is less important than natural ecosystems. Immature post-logging regrowth must not be given special protection from wildfire	As above, immature regrowth is not an issue within the parks	2(g)
1	22.4	The COAG report P107. Box 6.3 " <i>The use of fire in ecosystem management. The Ecological Society of Australia has developed the following position statement on the use of fire in ecosystem management. The Ecological Society of Australia recognises the need for land managers to use and exclude fire for management purposes. Fire, however, is a complex phenomenon and if employed (or excluded) without adequate knowledge, can threaten the biological productivity, biodiversity and sustainability of ecosystems. For example, biodiversity loss has been associated with both high fire frequency and fire exclusion. Conversely, certain fire regimes are essential for the survival of some native species. During the past few decades, the use of fire as a management tool has become controversial, with conflicts arising between different land management objectives, especially the maintenance of biodiversity and 'protection' of assets</i> "	Noted, as above	2(d)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	22.4	Box 6.3 cont. <i>"It is essential therefore that fire management be planned in a much more strategic and integrated way to achieve management objectives and thereby minimise the conflict between conservation and other goals. This can be achieved in part by: (1) the use of integrated management plans with ... clearly enunciated objectives; (2) explicitly resolving conflicts between different objectives at locations where these occur; (3) identifying fire regimes known or suspected to cause loss of biodiversity and, where possible, avoiding these fire regimes in management practice; (4) monitoring of specified performance indicators; (5) incorporation of the results of monitoring into future management action."</i>	Noted, as above	2(d)
1	22.4	The COAG report P108, Box 6.4 <i>"Biodiversity Conservation. Australia has ratified the Convention on Biological Diversity, and the Australian Government and the states and territories have jointly developed the National Strategy for the Conservation of Australia's Biological Diversity, which entails obligations to regulate or manage relevant processes and activities where a significant adverse impact on biodiversity is occurring."</i>	Noted	2(b)
1	22.4	The COAG report P110, Box 6.5 <i>"Inappropriate fire regimes and biodiversity. Inappropriate fire regimes have been recognised as potentially threatening to the conservation of biodiversity. The National Land and Water Resources Audit noted that changed fire regimes threaten ecosystems across Australia and are one of the principal threats in northern Australia. The national State of the Environment Report 2001 highlighted the deleterious effects of inappropriate fire regimes on native species, especially in the arid and semi arid rangelands. The Action Plan for Birds 2000 estimated that altered fire regimes affect 45% of mainland bird species. The Australian Government and state and territory governments recently identified 15 national biodiversity 'hot spots' - regions of Australia that are rich in biodiversity but also under immediate threat - as priorities for funding. For 10 of these 15 regions, altered fire regimes and/or threat from bushfires is listed as a ket threatening process adversely affecting the biodiversity of the region"</i>	Noted	2(a), 2(b), 2(d)
1	22.4	The COAG report p126, Recommendation 6.3 <i>"All states and territories should have a zoning approach to the classification of fuel management areas, with clear objectives for each zone. The process should be applied at the landscape scale, and all land managers and the community should be involved"</i> . The concept of zoning is well covered in the fire management plan for the Broadwater National Park in NSW	The Department uses the Landscape Conservation Unit (see Map 8) as a basis for fire planning and the Master Burn Plan provides more detail on "zoning"	2(d)
1	22.4	The parks should be zoned for wildfire risk management, with clear objectives for each zone. The recent national inquiry into bushfire mitigation and management recommended that this process be applied at the landscape scale, with all land managers and the community involved	As above	2(d)
1	22.4	The Fire Landscape Conservation Units (Map 8) are much too broad and their vegetation types much too varied to be the basis upon which to develop fire management. For example, while the landscape in Southern Dunes may be "Stable and unstable dunes with associated valley ecosystems" the vegetation varies from jarrah, karri and marri forest to coastal heath to former peppermint woodland (now dense peppermint thickets as a result of too frequent fires) to swamps and wetlands	For broad fire planning, the Landscape Conservation Units are an appropriate size and based on an assessment of vegetation by a qualified ecologist. This approach is then followed by planning for the protection of the specific communities that you suggest (e.g. peppermints, karri) and threatened species	2(d)
1	22.4	Prescribed burning regimes developed for forested ecosystems are not appropriate for other vegetation types, especially wetlands and damplands such as occur around Lake Jasper. There is a serious over-emphasis on forest in the DMP (e.g. p 68) when only about a fifth of D'Entrecasteaux National Park is forest	The broad principles of the model are appropriate to any Landscape Conservation Unit and the use of "Forest Landscape Scale" on p68 does not mean only forest areas and to clarify this, the term forest will be dropped from the final plan	1(e)
1	22.4	Fire Management Plan - Broadwater NSW (1998) Attached to this email is a .pdf copy of the fire management plan for the Broadwater National Park in NSW. I am not sure whether it is still current or whether any changes have been made. I am also not sure whether major fires have burned in the park in the last few years. The document has a number of interesting concepts and solutions, which may be applied in the Shannon and D'Entrecasteaux National Parks. One of the statements I most thoroughly enjoyed was that "NPWS considers it important to maintain the old-age heath vegetation in the Park" (see below). It is worth looking at the whole document, rather than only at the extract I included in these notes. The extract doesn't reflect the overall approach taken by NPWS and can easily be taken out of context	Noted, more detailed fire planning for the parks is provided in the Master Burn Plan, which provides for maintaining a diversity in fuel ages as well as the protection of community assets and is available to the public	2(b)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	22.4	Extract from Fire Management Plan - Broadwater NSW (1998) " <i>Strategic wildfire management zones have been established for the purpose of restricting the spread of unplanned fires through the manipulation of fuel levels. Strategic fire management therefore supports both human protection (see above) and conservation objectives (see below). Manipulation of fuel in SWCZ is primarily intended to reduce the intensity of wildfires to a level where suppression is effective and safe. Generally, strategic fire management will be based on improving the capability of control lines within and bordering the Park and reducing the levels of fuel in locations where fire may escape from the Park to adjoining land. In some areas, as a result of liaison with neighbours, management extends beyond the Park boundaries...Much of the park has not burnt for long periods. The relatively fire-free history in recent decades has resulted in a condition for biodiversity not found elsewhere in the nearby coastal zone. NPWS considers it important to maintain the old-age heath vegetation in the Park, but recognises that under adverse weather conditions, containing fire to a single management area could be extremely difficult. For this reason, the fire suppression effectiveness of a number of strategic east-west trails will be increased by incorporating BAMZ areas adjacent to them. This will increase the likelihood of NPWS being able to contain a fire within the Park to a single management area. Fuel management for these trails is described in Table 4.3 below.</i> "	Noted	2(b), 2d)
1	22.4	p68, Para 6. The text here relating to the pilot studies is dated and needs edits to make it contemporary, delete reference to pilot studies and paragraph relating to "in the interim"	Noted	1(e)
1	22.4	At the top of page 69, in the second line after "protection of life..." add "(including the safety of visitors and fire fighters)"	Text has been deleted from other comments received	2(d)
1	22.4	P69 1st para, " <i>In the interim...</i> ". This is a very general statement and provides no specific controls or direction on how the parks should be managed in the next 10 years or until the outcomes from the above study are applied, which themselves are not yet known	Text has been deleted from other comments received	2(d)
1	22.4	P69, P2. Edit to read. " <i>To assist in this approach, Fire Exclusion Reference Areas of up to 500Ha have been established in most Landscape Conservation Units...</i> "	Noted	1(e)
1	22.4	P69, Fig 8. Use the same figure that is used in the Wellington NP and St Johns Brook NP plan	The latest figure will be used	1(e)
1	22.4	The uncertainty of the JP of upland jarrah complexes is carried into the conceptual model on page 69, where it is not clear whether the 3-4 years (burn interval between burn 1 and burn 2) refers to twice the juvenile period and the proposed frequency for burning, or whether, indeed, it refers to the juvenile period and should be doubled so that burns would be conducted every 6-8 years. The above implies that vegetation can and should be burned as soon as 50% of the "slowest" understorey plants flower. This is, in my view, a flawed approach and does not allow understorey plants and vegetation communities to mature. This has a flow-on effect on habitat and fauna. This is a highly simplistic approach. It appears to focus on upland forested areas and fails to provide a solution for the many different vegetation communities which occur throughout the parks	Each vegetation complex would be treated differently, upland jarrah is only an example of burn intervals. The figure is going to be amended in the final plan to reflect current fire management policy in any regard	2(d)
1	22.4	p69 3rd Para. This is a very simplistic approach. It implies that fire prone (upland areas) can and should be burned very frequently. Although this conceptual regime appears to restrict each burn to 60-80% of burn area, it is possible that the unburned areas can or will be burned in the next burn, which occurs 3-4 years after the initial burn. This provides a fire return period of 3-4 years for the majority of the burn area and a possible fire return period of 6-8 years within the 20-40% which remained unburned in the initial burn. (Please note that it is not clear whether the 3-4 years refers to twice the juvenile period or the juvenile period, see also earlier comments)	Figure 8 portrays a conceptual ecological burning regime with burns being undertaken at varying frequencies, seasons and intensities to create fire diversity. Under this concept it is likely that some areas will not be burnt for many years, particularly fire sensitive plant species and communities	2(e)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	22.4	The conceptual regime attempts to limit burning of fire sensitive communities to less than 5%. Even though this implies a fire return period of on average, more than 20 years in these fire sensitive communities, it can allow fire return periods every 6-8 years within the same "patch" of a fire sensitive community. This has the potential to eliminate flora and fauna species from such a "patch". Furthermore, the 4th burn in the cycle, which will typically burn 90% of a management unit, will most likely include a significant portion of fire sensitive communities. Under this conceptual regime the 4th burn would be conducted after 9-12 years, which is a much shorter period than the minimum 20 years which would apply if less than 5% of a fire sensitive community was burned in each burn. Although it could be argued that, theoretically, no more than 5% of fire sensitive communities should or will be burned in each individual burn, including the 4th burn, it may be very difficult to achieve this outcome in practice	Noted	2(d), 2(e)
1	22.4	It must be noted that the above model allows all areas of the parks to be prescribed burned in the first year and again after 3-4 years, provided 60-80% of the burn area remains unburned and only <5% of fire sensitive vegetation is burned each time	Noted	2(d), 2(e)
1	22.4	The Figure 8 approach does not address or incorporate wildfires, which may also burn fire sensitive communities	In the event of a wildfire, the cycle would re-commence, the final plan will clarify this	1(e)
1	22.4	The conceptual ecological fire regime model proposed on page 69 has significant shortfalls and should not be adopted as a fire management model for the parks	The Department and the Conservation Commission supports the conceptual model outlined in Figure 8 for achieving appropriate ecological fire regimes for Landscape Conservation Units	2(e)
1	22.4	P69. Figure 8. Spring burning has been criticised by many biologists. Some of the deleterious effects include the destruction of the invertebrate life required for birds, most species of which fledge their young in spring (Davies 1979). Spring burning reduces the survival of rare frogs (Driscoll & Roberts 1997). In a study of germination in a Banksia woodland (Roche et al 1998), no seedlings emerging during the spring of the first year after fire survived into the following summer. Recruitment from seed was found to be profoundly affected by the season. Spring burning should be avoided if biodiversity is to be protected. Ref: Davies, S.J.J.F (1979) "The Breeding Seasons of Birds in south-western Australia". Journal of the Royal Society of Western Australia. 63: 53-64. Ref: Driscoll, D.A. and Roberts, J.D. (1997) "Impact of fuel-reduction burning on the frog <i>Geocrinia lutea</i> in southwest Western Australia. Australian Journal of Ecology. 22: 334-339. Ref: Roche, S., Dixon, K.W., Pate, J.S. (1998) "For Everything a Season: Smoke-induced seed germination and seedling recruitment in a Western Australian Banksia woodland. Australian Journal of Ecology. 23: 111-120	The Department burns in both spring and autumn, not just spring. But most burning is done in spring as : a) the bushland is damp (not tinder dry), so fires are low intensity, patchy and easier to control, b) important refugia such as riparian zones, rock outcrops and peat swamps are unlikely to burn, c) weather conditions are stable, facilitating planning and control, d) there is a larger window of suitable weather, when burning can be safely implemented, e) being low intensity, fires have least adverse impact on the vegetation (burn/damage less live and dead vegetation) and habitat values and recovery is quicker and e) the research and monitoring done to date (see Abbott and Burrows Eds. 2003) shows there is no evidence of long term adverse impacts on the biota. The consequences of autumn burning only would be a limited window of weather opportunity, landscape dry so fires less patchy - i.e., more of the landscape burns including fire shadows/refugia, important habitats such as hollow logs and dead hollow trees etc. burn away or burn down, more of the live and dead vegetation is killed or burns away, fires generally more intense, so more damaging to vegetation, so longer recovery period. If we were to switch to all autumn burning, we would have to burn more frequently to reduce fire intensity and to encourage patchiness in autumn burns and protection of refugia such as riparian systems, rock outcrops and peat swamps	2(d), 2(e)
1	22.4	P69, para 3. Assurances are made that an "ecological fire regime" will discriminate between fire-prone and fire-sensitive habitats and will take into account the time required for re-stocking both floral and faunal organisms. Will ever fire-sensitive species have its optimum fire-free period in each of the different ecological environments? This sounds laudatory, but, in practice, it will be 'modified', Why? The goals of this management plan are unobtainable if CALM routinely abandons these in the face of any perceived threat to private property. CALM's legal responsibilities with regard to private property need to be clarified for it to be able to fulfil its statutory obligations	A section on community and asset protection has been added to the final plan. The Department where possible seeks to apply fire in a way that does not compromise biodiversity values. For example, prescribed burns to protect life and community assets may be manipulated using smaller burn cells to achieve biodiversity outcomes. However, where life and community asset protection coincides with high biodiversity values, and it is not possible to achieve both objectives, the priority will be given to the protection of life and community assets	1(e)
1	22.4	Ross Bradstock proposed a model in which 50% of an area should be retained within an age group (since the last fire) that is suitable for that vegetation, 25% at a younger vegetation age and the remaining 25% at an older vegetation age. This approach provides a mosaic of vegetation at different stages since last fire. If the mosaic of vegetation ages is carefully designed, areas with young vegetation will provide strategic low fuel zones across the park, which will reduce the likelihood of major fires developing. This will, in turn, reduce the risk to biodiversity conservation and community safety values. A similar approach should be applied in forested areas, woodlands, granite communities and wetlands	This model is proposed for the parks as part of Departmental approach to fire management and has been included in other management plan subsequent to the publication of the draft plan. An additional figure and text has been added to the final plan to bring it in line with the more recent management plans	1(e)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	22.4	For example, it may be found that heath communities have evolved with a fire regime which ranges from 7 or 14 years to 30 or 50 years. Karri forest may have a fire regime from 15 to 200 years and jarrah from 6 to 500 years. Woodlands, wetlands and granite communities may have different requirements. At a landscape level the aim should be to manage all heath communities so that 50% is in the 7-30 (or 14-50) years age group, 25% is less than 7 (or 14) years or to burn the same blocks of heath at regular and frequent intervals. (Please note that the minimum and maximum ages I used here are only examples and should not be seen as an accurate reflection of suitable fire regimes for the different flora and fauna communities within the parks)	Noted, as above	1(e)
1	22.4	Findings and recommendations from the National Inquiry on Bushfire Mitigation and Management (COAG 2004) but also the concepts of a vegetation age model developed by Ross Bradstock and some of the concepts of the fire management plan for the Broadwater National Park (NSW) (attached) could form the foundation of the new fire management plan for the parks	Applying the principles stated in Appendix 9 of the draft plan and the conceptual ecological regime model (Figure 8) will result in an inverse curve approximating the vegetation age model referred to	2(a), 2(d)
1	22.4	The mosaic approach is commendable. However, it is not clear whether the concept of "Fire Landscape Conservation Units" (Map 8) is appropriate and detailed enough to capture fire regime requirements within the parks (e.g. Mallee Fowl, granite communities, wetlands). Furthermore, this statement does not provide an indication of the ranges of fire histories (i.e. fire regimes or vegetation ages since last fire and fire return periods, intensities and spatial distribution etc). It is, therefore, possible to maintain a mosaic of vegetation ages in the range from 3-4 years with a few small areas maintained at 9-16 years (conceptual fire regime, p 69), and still meet the requirements of the management plan. This may be highly undesirable and may result in the loss of diversity	As above	2(d)
1	22.4	Maintaining large unburnt tracts of land will be beneficial for the national parks	Applying the principles stated in Appendix 9 of the draft plan and the conceptual ecological regime model (Figure 8) will result in some areas remaining unburnt for extended periods	2(d)
1	22.4	Burning should be kept to a minimum	As above	2(d)
3	22.4	Our prime concern is that there are buildups of fuels in long unburnt sections of the coastal strip already that will allow for the development of large and high intensity wildfire in the near future. Such fire behaviour will not only be a threat to firefighters in certain situations, but significant damage to mature peppermints, yate and banksias and karri/jarrah/marri stands would result. Such damage during midsummer/autumn weather and soil moisture conditions will result in far greater damage than "milder" burns, even if slightly higher intensity than prescribed (once a burn is alight factors such as wind strength etc can change rapidly and escalate fire behaviour significantly)	The management plan proposes a concept that is a conservative guide to deliver an ecological fire regime with vegetation in different stages of a burn cycle, determine an appropriate interfire period and conserve biodiversity. The safety of firefighters and community is an important consideration in any fire management plan or activity	2(d), 2(e)
2	22.4	Unless there is a significant change in current management strategies, particularly with fire management, the natural (biodiversity) values of the park will be severely diminished by 2015. That is because there is a substantial backlog of long unburnt coastal vegetation in the park, which, if not prescribed fuel reduction burnt (as soon as possible) will very likely be burnt in excessive high intensity and damaging wildfires within the park boundaries	As above	2(d), 2(e)
1	22.4	The current management of long intervals between fires create a boom and bust situation that severely restricts biodiversity as well as creating the principle requirement-high fuel loads-for high intensity wildfire's on a wide scale basis	As above	2(d), 2(e)
1	22.4	There is no mention of the serious backlog in fuel reduction burning	As above	2(h)
2	22.4	These long unburnt areas (10 years plus) contain large quantities of dead and dying vegetation, plus green vegetation, which, in a summer/autumn wildfire event, will burn with very high intensity. This will result in landscape-destroying fires, the deaths of native fauna, 'cooking' and destruction below ground stored seed (therefore reducing the seed bank and complexity/structure of floral species)	As above	2(d), 2(e)
1	22.4	With the government encouraging the public to use these national parks for recreation the risk of wild fires grows. If fuel reduction burns are not carried out a disaster on the same scale as Canberra will occur, but worse	As above	2(d), 2(e)
3	22.4	Wildfires will occur, by lightning or other causes. In that case, low fuel zones are vital for realistic suppression chances. Bulldozers will have to be used and will cause some damage. It is better to regularly burn the country rather than risk damaging wildfires. Suitable access must be maintained for fire and prescribed burning access	As above	2(d), 2(e)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
3	22.4	The basic proposal outlined indicates: (1) The status quo (with additional constraints/caution where threatened species occur) would continue i.e. no new focus on fuel reduction and ecological prescribed burning, in fact probably less due to new constraints; (2) Identification and mapping of floral species would continue to allow more improved burn planning to minimise threats to certain floral species, on the spurious grounds that these are threatened by fire; (3) Opportunistic burning, particularly in late autumn/early-mid winter would be utilized if resources are available	As above	2(g)
1	22.4	Our national park forests are only sustainable if burnt	As above	2(d), 2(e)
1	22.4	I am aware that this plan only applies to two national parks but I consider fire control should apply in all national parks. At the present time the condition of national parks in this area is nothing short of a disgrace. They have not been burnt for many years. A lot of the native plants need fire to regenerate, for example, Orchids, Clematus and to a lesser extent Boronia. The best show of orchids is one or two years after a fire. I doubt many have survived the build up of litter on the forest floor. If these parks were to catch alight be it by lightning strike or other means I fear that there is a great tragedy just waiting to happen. If it did happen, who would take responsibility? I consider every park should be burnt a maximum of every 5 years	As above	2(d), 2(e)
1	22.4	In recent years we have witnessed a decrease in the burning program carried out by CALM, due to pressure by conservationists or weather conditions. I believe CALM should increase burning programs surrounding private property. This should be carried out every 5 years. This would create a buffer zone, minimising losses to stock and property and give safe havens to wildlife in the event of wildfire. Keep access to old logging roads for easy access to property boundaries and useful for back burning	As above	2(d), 2(e)
1	22.4	As there are many varied vegetation complexes within the National Park/s a blanket fire regime is not appropriate. Fire regimes must be suited to the vegetation complexes and include long unburnt areas that are essential for certain species e.g. Honey Possums, Quokkas, Tammam Wallabies	As above	2(a), 2(d)
1	22.4	A lack of management of the parks have seen them change dramatically. The vegetation there now is totally different to when my father drove cattle there during WW2. Animal populations have shifted and mostly disappeared. This is due to not burning as carried out by Aborigines and then our forefathers	As above	2(d), 2(e)
1	22.4	While the treatment of "fire" is comprehensive there seems to be an omission in that there is no mention of the relationship between the age of fuel and the difficulty of suppressing the fire nor the damage that is caused by a wildfire in a heavy fuel under severe conditions. CALM Fire can provide this information. This is an important factor in planning sufficient fuel reduction burning each year to ensure that the age of fuel in the parks is never greater than that which will allow a wildfire under severe conditions to be contained	As above. Large, intense fire regimes being damaging to biodiversity is mentioned in para 1, p65, and dry fuel thresholds are mentioned para 2 in Fire Behaviour on p67	2(d), 2(g)
1	22.4	The fire management problems in this park and elsewhere are symptomatic of greater fire management issues affecting much of the CALM estate and as such need urgent consideration at government and departmental level before major and devastating wildfires occur. These fires will eventually occur, with extensive damage to the environment and timber resource, manmade infrastructures with great human impact, possibly including deaths of firefighters or the public, at great direct and indirect cost	As above	2(d), 2(e)
3	22.4	Fire fighter and walker/recreationist safety is paramount. Significant unbroken areas of heavy fuels will pose a definite threat to their safety, especially in midsummer/autumn when large numbers are likely to be present	As above	2(d)
1	22.4	Inadequate bush fire strategies (numerous intense fires have occurred at numerous locations during the previous management plan, dramatically altering vegetation types and reducing biodiversity at these sites)	As above	2(d), 2(e)
1	22.4	We believe the greater detrimental issues arising from the management of the national parks as: management to prevent and contain wildfire	As above	2(d), 2(e)
1	22.4	Uncontrolled high intensity bushfire is a threat to all values of all terrestrial parks in Western Australia	As above	2(d)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	22.4	The worst possible outcome for biodiversity is very large, landscape-level all-consuming killer high intensity raging bushfires, and these are an absolute certainty if a program of regular fuel-reduction burning is not carried out	As above	2(d)
3	22.4	Arrangements should be in place to ensure that aerial and other forms of ignition can be undertaken in Autumn/early Winter if suitable conditions occur. Any costs incurred then may be repaid many times over by providing low fuel zones which may be crucial if wildfires occur at a later time	As above	2(h)
1	22.4	The high forest in the Shannon National Park was largely harvested for timber in the 50s and 60s using a selective silvicultural system that in many areas has not resulted in sufficient regeneration to restore the character of the original old growth forest. In these areas, the dense impenetrable undergrowth and sparse tree cover will never match the attraction of coastal scenery. Radically different fire management strategies are needed to restore the natural features and biodiversity of the two parks	Noted, as above	2(d)
1	22.4	The re-growth areas of the Shannon should be commercially harvested. They will be destroyed by wildfire unless thinned and the money gained could be used to control pigs, Victorian tee tree and attain good fire management practices	It is current Government policy that national parks are not available for timber harvesting for commercial purposes	2(f)
3	22.4	Because of the difficulty of burning unthinned karri without substantial damage, it would make sense for regrowth forests to be commercially thinned, then prescribed burnt. Future generations may require this resource, so it must be responsibly protected	As above. As the stands are no longer used for commercial means, some damage to the stands is acceptable and reminiscent of natural processes	2(d), 2(f)
1	22.4	There is no mention of the need for high intensity burning to renew the extensive areas of karri forest that have been harvested in the Shannon National Park	Appropriate burn intensities are addressed in the Master Burn Plan and detailed burn prescriptions for individual burn areas	2(c)
1	22.4	Fire to be used as a tool to maintain diversity of habitat and to reduce frequency of intensely destructive wildfire	As above. The management plan proposes to create a mosaic of vegetation areas	2(d)
1	22.4	Closing up large areas of forested and heath land will lead to its destruction by fire. Regular mosaic burning should take place in all national parks, state forest and vacant Crown land	As above	2(d)
1	22.4	For large areas only mosaic fires are undertaken	As above	2(d)
1	22.4	In regards to the fire issue, I feel the areas burnt are too big. How can an animal escape from a 10,000Ha burn site?	The scale of prescribed burns are aimed between 500 to 5000 hectares. Within the burn boundaries not all of the area is burnt. There are areas burnt at different times and some areas remain unburnt. Most burn prescriptions aim for a mosaic of burnt and unburnt areas providing refuge areas	2(d)
1	22.4	The bushfire management philosophy underpinning this management plan will lead to: (a) Longer between-fire intervals across both parks; (b) More uniform and more intense fires as a result of higher fuel loads because of less frequent burning; (c) A loss of those communities that depend on short rotations (the savannahs); (d) Serious damage to communities vulnerable to high intensity fire, such as old growth karri. None of these outcomes is desirable. In the pursuit of maximising biodiversity at the site level, the draft plan sets up the loss of diversity at the landscape level	The management plan provides for regular prescribed burning within the parks at appropriate regimes to preserve biodiversity and the values of the area	2(g)
1	22.4	There is little question that fire diversity creates biodiversity and that large and intense wildfire's are the biggest threat to that diversity. With vegetation ranging from sedges and heath to jarrah and karri forest and a wide range in between a varied fire plan is required	As above	2(d)
1	22.4	As part owner of Loc 7965 I have witnessed the very poor attempt to burn the adjoining national park over the last 4 or 5 years. The so called mosaic patch burning of the coastal flats and peppermint hills has, in my opinion, been a complete waste of tax payers money. It is not 'if' but 'when' a big fire starts. This type of burning will be absolutely hopeless against even a moderate wildfire. The fire plans will show, no doubt, that these areas have been burnt in recent years, which is obviously not the case, as they are only 25% or less (an usually edge) burnt only. Fires like this will lead to devastating loss of life and property. The answer is to burn these areas more frequently initially at a higher hazard rating to clean the areas up, then later (when the fuel levels are lower) at a lower rating as they were for the last 200 or more years	As above	2(d)
1	22.4	Pt Nuyts Wilderness Area devastated by wildfire as a result of nil burns in wilderness areas	As above, Nuyts is not within the planning area and is not a gazetted wilderness. There will still be prescribed burns in gazetted wilderness within the parks. This is mentioned on p81 of the draft and will be reiterated in the Fire section of the final plan	1(e)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	22.4	Fire protection - You are closing down tracks within the park - no access means it is only a matter of time before we have another catastrophe similar to the March fire of 1987. Large areas should have tracks through them so that controlled burning can take place	Management access tracks are still available for fire management purposes	2(g)
1	22	Request that CALM actively consider the implications particularly if access tracks are rationalised and/or areas are converted to 'wilderness'. In turn, that CALM consider the possible impacts of access track rationalisation and wilderness classification of fire management onto adjoining/nearby freehold land	As above. In addition the gazettal of wilderness areas does not necessarily result in no prescribed burning	2(g)
1	22.4	P70, Para 1: Edit - ...flora databases maintained by the Department. Delete: Work centres and the Department's Wildlife Branch is notified of any burn proposals	Noted	1(e)
2	22.4	Take all precautions with suppression burns, including rare flora tests at both seeding and flowering times before suppression burns are undertaken	Before prescribed burns are undertaken, the proposed areas are assessed for threatened flora as the draft states, using Departmental databases	2(d)
1	22.4	P70, Para 2: Edit to read: " <i>Fire management in the Parks will utilise the existing track network... fuel moisture levels to delineate areas to be burnt from those not to be burnt</i> "	Noted	1(e)
1	22.4	P70, Para 2: Delete: " <i>However, care should be... months afterwards</i> "	Noted	1(e)
1	22.4	P70, Para 3: Redraft to read " <i>Fire management will require soil-disturbing activities such as fire break construction and maintenance. Baring the earth and moving soil can result in the introduction or spread of dieback disease (see Section 21 Diseases) or erosion. The biota in the Parks is adapted to, and will recover from, the impacts of most fire events. The biota is not adapted to dieback disease or significant erosion events and these events could result in significant and permanent damage. All fire management operations will utilise dieback disease hygiene and soil erosion mitigation tactics. All temporary access constructed in association with fire suppression operations will be rehabilitated</i> "	Noted, the paragraph will amended only in part	1(e)
1	22.4	Wildfire mitigation and management must take account of the sensitive vegetation types within the parks and the interaction of fire and Phytophthora dieback	Noted	2(a)
1	22.4	We endorse the DMP statement (p70) that inappropriate earthworks may cause more damage than a wildfire	Noted. Any earthworks undertaken during wildfires are identified in a Recovery Plan and rehabilitated	2(a)
1	22.4	We endorse the DMP statement (p70) that inappropriate earthworks, whether done or during wildfires, may cause more damage than a wildfire	As above	2(a)
1	22.4	P 70, para 4: Re-draft - " <i>In addition, ongoing liaison will occur with agencies controlling land adjoining the parks and organisations with fire suppression responsibilities in regard to fire protection and prevention</i> "	Noted, paragraph will be amended in part	1(e)
1	22.4	P 70, Para 5: Delete "Based on all available information"	Noted	1(e)
1	22.4	P 70, Para 7: Edit - The Conservation Commission, through their audit function, will periodically examine the Department's performance against the Master Burn Plan	Noted	1(e)
2	22.4	The RMBP is not appended so there is nothing in the draft plan to say how fire will be specifically managed in these two parks	A management plan is designed to establish strategic direction and not detailed annual burning program. As the draft states p71 the detailed information contained in the Regional Master Burn Plan is available via the Warren Region Fire Coordinator based at the Department's Manjimup Office. The Warren Region Indicative Six Season Burn Plan which is the result of the Master Burn Plan review is made available to community stakeholders for comment and input, and is also available on NatureBase http://www.naturebase.net/content/view/2290/1143/	2(b), 2(h)
1	22.4	p70, para 5. This approach is inadequate. The management plan should provide a clear overview of operations to be carried out and performance criteria to be met, especially in relation to fire management	As above	2(h)
1	22.4	The consultation process involving District and Regional Fire Co-ordinators and interested community groups does not provide an effective solution to resolve any differences in views in relation to fire management, providing CALM regional and district staff with the opportunity to apply whichever fire regime CALM staff believe is appropriate. In the best case scenario such a fire regime may have significant biodiversity conservation impacts	As above, the MBP consultation process is no more limited than the management planning process	2(f), 2(h)
27+1	22.4	The plan does not include a fire management plan. This must be developed with full community participation	As above	2(b), 2(h)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	22.4	Since the DMP does not include a fire management plan for the parks developed as required under the CALM Act, I further recommend that such a plan be developed, with full and genuine community involvement	As above	2(h)
1	22.4	This master burn plan approach negates the planning and consultation process (see ss. 57 and 58 of the CALM Act), which was established for national parks under current legislation and fails to comply with the requirement to list "a summary of operations proposed to be undertaken, in respect of that land during a specified period, which shall not exceed 10 years" (s.55(1)(b))	As above, the release of the draft management plan for public comment fulfils the legislated requirements, and the objectives and strategies address the summary of operations	2(h)
4	22.4	A fire management plan for the parks must be prepared, with full community participation	As above	2(h)
2	22.4	Contrary to what the DMP says, CALM has never released its Master Burn Plan for public comment. It is essential for meaningful public consultation that this document be released. CALM must make its Master Burn Plan and three-year indicative burn plan available to the community for genuine input immediately	As above	2(h)
1	22.4	The DMP does not provide a fire management plan for the parks. It just makes general statements about fire management, with an objective and strategies. For two major conservation reserves in one of the world's biodiversity hotspots, where changed fire regimes are identified as one of the threats, this is not good enough	As above	2(h)
1	22.4	Essentially, the fire section states that it will adopt the concepts outlined on page 68, subject to the outcomes of four pilot studies and that it will, in the interim, "continue to focus on the maintenance and protection of life and property, fire sensitive communities, fire sensitive species and recreation areas" (p69). Furthermore, it states that "specific details of the Department's fire management activities for the parks are not included..." and that the Master Burn Plan planning process will be used to "prepare a 3-year indicative fire program". This approach is, in my view, inadequate and unacceptable. The DMP should not be adopted until a new, more specific fire section has been prepared. A further period of consultation should apply after a new draft section has been developed	As above	2(h)
1	22.4	Before we can comment on CALM's proposed fire management, CALM must provide detailed maps, satellite imagery and photographs so that we can see how much of each vegetation type has been burnt, and overlays so that we can in what years each area was burnt (and thus how many years between burns) since records were kept	As above	2(b), 2(h)
2	22.4	Before we can comment on CALM's proposed fire management for the Lake Jasper area, detailed maps, satellite imagery and photographs are needed so that we can see how much of each vegetation type in the Lake Jasper area has been burnt and overlays so that we can in what years each area was burnt (and thus how many years between the burns) since records were kept	As above	2(b), 2(h)
1	22.4	I recommend that private property on the western boundary of D'Entrecasteaux NP known as Womil is a 'no planned burn' area	Fire regimes on private property adjoining the parks is outside the scope of the management plan	2(c)
1	22.4	The three private properties on the western boundary of D'Entrecasteaux National Park, known as "Womil" are a "no planned burn" area	As above	2(c)
1	22.4	The build up of fuel to the west of our farm (map attached) is becoming of great concern (20years +). Our local brigade of which I am the FCO is not equipped to burn or fight large karri fires. CALM is not keen to burn these small pockets because of economic reasons, so consequently nothing gets done	Noted. Specific concerns relating to potential wildfire threats should be raised with the Departmental District Fire Coordinator at the Pemberton office	2(h)
1	22.4	The submitted fire philosophy is dominated by the idea that fire frequency must not be shorter than 2 to 4 times the maturing (seeding) age of the slowest species. It then equates this minimum fire frequency to minimum rotation for the whole type. This logic is seriously flawed as it fails to recognise that if burn intensity is low, burns are patchy and some areas inevitably have a longer burning cycle	The application of the precautionary principle assumes that if the more sensitive biota persists then less fire sensitive biota should also continue to persist, and that each fire event is of an intensity sufficient to kill every plant on the site (which is not realistic). The plan says that this concept is a conservative guide to determining an appropriate interfire period. The fire sensitive and threatened species and communities are of most concern in managing fire, and application of fire at an appropriate scale, season, intensity and frequency will ensure that unburnt patches remain	2(d)
1	22.4	P 70, para 6. Delete last sentence. It is not consistent with the paragraph, which addresses incorporation of new knowledge. In any case wildfires are considered systematically in the master burn planning process	Noted, point has been added to text supporting Figure 8 from other comments anyway	1(e)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	22	On P71 in the box, after Key Points add "for Fire Management"	The management plan format has recently changed to include name of the relevant section before "Key Points" which in this case means the final will state "Fire Key Points"	1(c)
1	22	The statement in the key points box, "This type of fire regime led to a canopy of..." appears to infer that it was the cattlemen that caused the grasslands. It is important to acknowledge: (1) that these grasslands were not the result of European management although they may have continued to be maintained by European management; (2) were part of the indigenous peoples heritage; (3) were in place long before colonisation; (4) that they were part of a broader biodiversity that resulted from the same indigenous management processes	Noted	1(e)
1	22	Grasslands in the area of the D'Entrecasteaux NP were recorded by the surveyor AC Gregory 1852. Gregory reported by 80,000 acres (320 sqkm) of grassland principally near the mouths of the Donnelly and the Gordon (Gardner) Rivers (Letter to the Colonial Secretary 9th July 1852). This was before the area was subjected to cattle grazing	Noted	1(e)
1	22	"Chief Superintending Surveyor" Frederick Slade Brockman reported 60,000 acres (240sqkm) of first class grassland over much of the same area in 1904. (Report to the Surveyor General 1904)	Noted	1(e)
1	22	Brockman and Gregory give different distribution of grasses for the area between the Gardner River and the Broke Inlet. This presumably reflects the mosaic burning pattern of the Noongar inhabitants and possibly the more recent influence of cattlemen. The dominant grass in that area appears to be <i>Austrostipa compressa</i> a fire ephemeral grass appearing only in the first season after fire	Noted	1(e)
1	22	You should read Brockman's 1906 account of the vegetation in the area. He makes reference to extensive grasslands along the coast - these could have been burnt every 1-2 yrs. Other explorers (Hillman, Gregory) also allude to the extent of grassland. You should talk with Ted Middleton at Walpole about this, as he is particularly well informed on the matter	Mr Middleton has made a submission to the plan, see comments above	1(e)
1	22	Key point 2: Please add Banksia woodland as a fire-sensitive vegetation complex or are you classifying these woodlands as wetlands?	The second dot point is illustrating that fire sensitive species and communities, including some species of banksia, are most typically associated with the moister parts of the landscape (e.g. wetlands and riverine communities) and areas with discontinuous vegetation (e.g. granite outcrops). Text will be reworded in final	1(e)
1	22	Key point 3: By far the most area burnt as a result of human activities was that from 'escapes' from CALM burning	Table 5 in the draft plan shows that lightning caused fires burnt the greatest area from 1989 to 2004	2(g)
1	22	P 71, Key Point 4: Delete "At the time of writing.....52 animal habitats"	Noted, this is not a key point	1(e)
27+3	22	The protection of property and recreation assets in and near the parks must not be used to justify frequent broad-scale burning in the parks which is a serious threat to maintaining their conservation values	A section on managing fire for community and asset protection has been added to clarify the Department's position	1(e)
1	22	Amend objective to include "protect and" maintain conservation values	"Protect" has been added	1(d)
2	22	In principle we support the objective	Noted	2(a)
1	22	Still in the box on p 71, enlarge action 3 to become: " <i>Continuing to focus on the protection of life (including the safety of visitors and fire fighters), property, fire sensitive communities, fire sensitive species and recreation assets</i> "	It is not necessary to keep on repeating this phrase	2(h)
1	22	P71. Is a communication plan to be prepared about educating the community about fire, their responsibilities etc?	Refer to strategy 7	2(d)
1	22	Funding to be allocated to expand current research into organic soils and their pyrolysis; CALM give every support access and assistance to this research	Noted. Strategy 8 states research will be facilitated	2(a), 2(d)
1	22	P 71, Strategy 8: Delete "before implementing major changes in fire regime in the parks"	Noted	1(d)
1	22	P71, Strategy 9: Edit - Knowledge, associated with biodiversity values and fire regimes within the Parks	Noted	1(d)
1	22	The DMP does not provide specific solutions or performance criteria in relation to fire management. At the same time, inappropriate fire regimes are listed throughout the DMP as a threat to many of the species and communities	Appendix 2 list key performance indicators for assessing the implementation of this management plan. The objective states the need to maintain conservation values including flora and fauna species and communities	2(g)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	22	Key Performance Indicators listed in Appendix 2 in relation to fire are inadequate and unworkable. Even though the intent is commendable, the KPIs are very generic and simplistic. It does not provide a meaningful indication on performance in relation to fire. New, meaningful and measurable performance indicators for fire must be developed and adopted	The KPIs listed represent the requirements of the Conservation Commission in being able to monitor and assess the performance of implementing the management plan	2(d)
1	22	The KPIs do not measure performance in relation to fire and biodiversity conservation	Not every strategy requires a KPI. KPI 22.3 and 22.4 are aimed at measuring maintenance of conservation values	2(d), 2(g)
1	22	The KPIs also fail to adequately address community safety and do not address wildfire risk management in relation to biodiversity conservation and visitor safety	An additional KPI will be added for protection of life and property	1(d)
1	22	Under 10, "Performance Assessment" I recommend that remaining peat be measured and the preservation of this as a KPI be monitored bi-annually rather than the 5 yearly assessment suggested in the draft plan	Measuring the extent of peat is impracticable	2(f)
1	22	KPI 22.1. The target to match the defined frequency distribution model for each unit can only be measured if a specific target for each unit is listed in the plan. A different solution must be developed to measure 22.1 The fuel age distribution within the Landscape Conservation Units. Ross Braddock's model may be useful in this context	Agreed. A conceptual figure has been included in the plan. However, the plan cannot provide figures for each Landscape Conservation Unit	1(d)
1	22	KPI 22.1 It is interesting to note and it is of concern that the term "fuel age" rather than "vegetation age" was used. It is also of concern that the focus of vegetation age is only on Landscape Conservation Units and not on vegetation communities, including fire sensitive communities. These are covered, to some extent, under "Performance Measures" 22.3 and 22.4 but not in the context of vegetation age distribution, which is an important aspect of fire management and which can easily be measured once a suitable vegetation age has been agreed to. The question also remains on how the term "maintained" can be measured in a meaningful way. Performance measures for section 18 are somewhat more specific. Different solutions must be developed to address this shortfall	The Landscape Conservation Unit is an appropriate scale for a management plan to convey. However this does not negate the need to consider specific plant communities in developing prescribed fire plans for individual burns. Strategy 3 addresses the need to focus on fire sensitive species and communities	2(d), 2(h)
1	22	After KPI 22.2 there should be an additional Performance Measure: "The area of the parks that is affected by wildfire emanating from adjacent land", and a corresponding Target: "A reduction in number of fires originating from adjacent land that affect the parks as compared to the previous 5-year period". Adjacent land means other land vested in the Conservation Commission or other government departments as well as private property	The management plan has no control over adjacent land and such a performance measure would therefore be an appropriate measure of plan performance	2(c)
1	22	On P200 in Appendix 9, enlarge Principle 4 to become: " <i>(c) to minimise the potential for damage to life (including the safety of visitors and fire fighters), property and natural resource values...</i> "	The fire management principles are quoted from a reference and as such it is inappropriate to change them without the endorsement of the author	2(f)
2	22	We did not see any mention in the plan of increased resources to allow CALM to properly manage fire in long unburnt areas, only increased constraints	The resources required to implement the plan is determined through the annual budgeting process and is not a detail included in management plans. Note, the Government's old growth forest policy has provided additional resources	2(h)
1	22	My wife and I have withdrawn our machinery from the available fire fighting equipment list because of insurance concerns duty of care and operator training. This has to be addressed by the government as more contractors become aware of the consequences of things going belly up during a fire	The decision to make equipment available or not is a business decision to be taken by the owner. Other local contractors are happy to continue to make machinery and equipment available to the Department	2(c)
1	22	Bulldozers, local contractors have mentioned they are not applying because of high cost of insurance	As above	2(c)
1	22	Increase number of experienced fire-fighting staff	Specific details on staff skills and experience levels are beyond the scope of the management plan. However, Departmental resources available for fire management have increased in recent years through several State Government initiatives. Specific details can be obtained from the Regional Fire Coordinator at DEC's Manjimup Office	2(c)
1	22	Greater respect should be given to local community members in regards to burning practices, despite the fact that they may not hold a university degree	Noted	2(c)
	Part D	Managing Our Cultural Heritage		
1	Part D	Excellent, both Indigenous and Non-Indigenous		2(a)
1	Part D	Very interesting reading though very short in comparison to other parts of the Draft. I feel that CALM have not provided enough detail for the general public to consider	Noted. Management plans are prepared to provide sufficient information to justify the objectives and strategies presented	2(b)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	Part D	I would like you to consider this statement please "As individuals, we all have something of our family's history, like an heirloom. It represents our past and it is all part of our identity. I think the reason urban heritage is so important is because it is part of community identity. I see the buildings as signposts to the past. If we don't have them, how could we have a past or understand our history and our identity as a community?" - "It is built heritage, cultural heritage, social heritage, migrant heritage, indigenous heritage, natural heritage". Kristy Bizzaca, Historian	Noted. This section is referring to National Heritage as defined under the EPBC Act	2(b)
1	Part D	Shutting this up is the death knock of all these areas	Controlling access is one of several strategies designed to conserve heritage sites	2(e)
1	Part D	Not much point in looking after this aspect when the majority of the park is going to be locked up, access needs to be provided	As above, and it is incorrect to say that the majority of the park is going to be locked up. Refer to responses to comments on Section 26 Access and 27 Recreational Use	2(e), 2(g)
1	Part D	Sites have to be recorded and access to these places provided	This included in strategy 4 for Non-Indigenous heritage and the strategies for Indigenous Heritage will incorporate something to this effect. However, please note the Department of Indigenous Affairs is the primary agency for recording sites of Indigenous significance	1(d)
	23	Indigenous Heritage		
1+27	23	Commit to undertake detailed studies to establish clear Aboriginal sites, as well as matters relating to mythological, ceremonial, cultural and spiritual significance	Noted. The Department is committed to this action as demonstrated by recently commissioning a heritage survey of Lake Jasper in 2007 however the Department of Indigenous Affairs is the lead agency for Indigenous sites	2(a)
1	23	Aboriginal sites need to be documented and protected	As above, documentation and protection of Aboriginal sites is an ongoing programme of the Department and other agencies and professionals such as anthropologists	2(a)
	23	Assessment of Aboriginal sites is required	As above	2(a)
1	23	Several sites of Aboriginal heritage value require further investigation in the Yeagerup Block	Noted, the Strategies will be amended to provide sufficient scope for further investigations to be undertaken	1(d)
1+27	23	It is my will that the draft plan includes preserving Lake Jasper that is part of our Indigenous Heritage. Specifically for Nyungar people. There are significant Indigenous archaeological sites at Lake Jasper that have been reported by the WA Museum	Noted	2(a)
1	23	Too much is being made of Aboriginal Heritage in the Lake Jasper area. The local elders don't see it as significant	This is not the feedback we have received from local Aboriginal groups or the Native Title Claimants. In addition, the sites are registered and protected under legislation	2(e), 2(f)
1	23	In this area there is not one living Aboriginal who know of a sacred site without being informed by either literature or another group of people studying the area. If they are so sacred surely they are known via their own Aboriginal history. We have Aboriginal friends and they are not privy to this knowledge	Unfortunately many Aboriginal people in the south-west have been separated from their culture as a result of European settlement and displacement. However, the number of registered sites on the Department of Indigenous Affairs database indicates there is a knowledge of cultural sites in the area. These sites may be recorded by local Aboriginal people or may be independently recorded by professional archaeologists and anthropologists and are significant	2(e)
1	23	What is known of this culture and heritage? Very little is known about Aboriginal life around here. Mr Charles Burns is the only Aboriginal I have known who was raised by and worked for the Brockman family. I understood it was taboo for Aborigines to enter the forest in this area. I may be wrong on this part	As above. Discovering the history of Aboriginal habitation and use of the area is an ongoing focus of anthropology	2(b), 2(d)
1	23	There is little known of cultural heritage. Only one Aboriginal(Mr Charles Burns) was known to reside in and around Pemberton. He was brought up by the Brockman family and worked the cattle leases for Brockman. He was an accepted member of the community and respected by all	As above	2(b), 2(d)
1	23	East Augusta reserve area 35744(Site ID 5764(S0367) Hardy Inlet and unreserved areas such as the Milyeaup engravings have state or national archaeological significance. As many as possible of these registered Indigenous Heritage sites should be protected from unintended damage from people or cattle hooves by purchase and protection in an expanded national park	Noted. Even though the areas described are outside the plan area current legislation provides sufficient protection of cultural heritage sites	2(c)
1	23	Prior to any proposed development/activity, so that no site is damaged or altered (resulting in a breach of S17 of the Aboriginal Heritage Act 1972) it is recommended that suitably qualified consultants be engaged to conduct ethnographic and archaeological surveys of the area. This should ensure that all Aboriginal interest groups are consulted so that all sites on the designated land are avoided or identified. Such a survey would involve archival research, consultations and on the ground inspections. It is our preference that any development plans are modified to avoid damaging or altering any site	As part of standard practices, the Department notifies Native Title claimants of any capital works proposals. In addition a MOU between SWALSC and the Department sets out both principles and guidelines under which access and cooperation may be established (see section 8)	2(a)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	23	Any development plans are modified to avoid damaging or altering any site. If this is not possible the land owner should submit a Notice in writing under Section 18 of the Aboriginal Heritage Act 1972 to the Aboriginal Cultural Material Committee, seeking the Minister for Indigenous Affairs' prior written consent to use the land. It is recommended that suitably qualified consultants be engaged to conduct ethnographic and archaeological surveys of the area	This is an ongoing practice via many programmes of the Department	2(a)
1	23	Encourage consultation with relevant Aboriginal people to formulate a heritage management plan and a heritage awareness package for the parks	As above, the strategy will clarify this	1(e)
1	23	Artefacts at Lake Jasper - Aboriginal heritage as a European we too believe in our heritage. Generations of us have been fishing, camping, skiing, wherever we like. Free country. Definitely not any more, thanks to CALM	Non-indigenous heritage is covered in section 24	2(e)
2	23	We agree with the objective. However, the strategies to achieve this objective must include joint management involving Noongar people whose country includes the parks. While joint management is referred to in the Preface(pii) and involvement of Aboriginal people (which is not the same thing as joint management) is included in the Key Performance Indicators (Appendix 2, 23.2), it is curious that there is no mention of joint management in Part D of the DMP	Joint management with Aboriginal people is covered under Departmental policy. For example refer to <i>Indigenous and Joint Management of Conservation Lands in WA: Consultation paper</i> (Government of Western Australia 2003). Part D deals specifically with how cultural heritage will be managed so section 8 Management Arrangements with Aboriginal People is where the discussion of joint management occurs in the draft plan	2(g)
1	31	I support the redevelopment of traditional indigenous culture. I endorse the principle of recognising the right of indigenous peoples to their traditional lands and way of life. I also recognise that expectations of the standard of living have changed since European settlement. This poses a difficulty for Park management		2(a)
2	23	The Performance Measure for KPI 23.2 should read: "Joint management with Aboriginal people" and the Target should read: "Increased level of joint management of the parks with Aboriginal people"	Joint management is one of several forms of management with Aboriginal people that could apply	2(a)
1	23	Any person camping in the Parks would be required to abide by the CALM camping guidelines for minimal impact camping		2(a)
1	23	Employ additional Indigenous Rangers	The Department has an active program to seek out, employ and retain Indigenous people in all roles across the Department including as park rangers	2(c)
	24	Non-Indigenous Heritage (see also 27.3.4 Squatters' Huts)		
1	24	It is comforting to note that CALM is going to protect and conserve the non-Indigenous cultural heritage of the parks	Noted	2(a)
1	24	p74, para1, 2. As the Vancouver and D'Entrecasteaux expeditions only landed in WA at Albany and Esperance respectively, these paras seem irrelevant to the plan	Noted. Reference to early French explorations provides relevant context for naming of features	2(d), 2(g)
1	24	Please note that 'cultural heritage' includes timber workers, farmers contribution over the last century, opening up and maintaining coastal tracks and community coastal resources	Noted. These are discussed in the Non-indigenous section	2(a)
1	24	All historical campsites should be restored and listed on the National Heritage list, the Register of the National Estate or the WA Register of Heritage places	Strategy 6 on p115 refers to registering huts as appropriate. However anyone can nominate a natural, historic or Indigenous place that is of outstanding national heritage value to the Australian nation for entry to the National Heritage List see http://www.environment.gov.au/heritage/national/listing.html . Similarly anyone can nominate a place for the Register of Heritage Places see http://register.heritage.wa.gov.au/explanation.html	2(a)
1	24	I fully support the objective to protect and conserve the non-Indigenous cultural heritage of the parks however find the proposed management plan lacking on criteria used to define what is worthy of protection and the strategy to achieve the objective as simplistic and it does not commit to following formal and objective process	The local authorities, Heritage Council of WA and National Heritage Council formally assess heritage. Other than that, the Department has engaged heritage consultants to review heritage of the huts within the parks	2(d)
1	24	The great damage to the area now known as D'Entrecasteaux National Park started with the disastrous practice of cattle grazing in the area	Noted	2(b)
1	24	Any attempt by Manjimup graziers to re-introduce cattle to the park must be prevented at all costs. The introduction of cattle and cattle-feed burning practices to the area now known as D'Entrecasteaux was the initial cause of the decline of the area	Noted	2(a)
1	24	In early times, the coastal heath near Windy Harbour was used for grazing sheep, consistent with evidence of fences visible throughout the area	Noted	2(b)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	24	The plan identifies the presence of non-indigenous heritage sites which relate to pastoral activities and are of considerable historical and recreational interest. Being of wood construction and include cattle yards and old huts within the parks, the need for fire management is essential	Noted. Fire protection strategies aim to protect park assets. This is covered by the fire management regime for the park	2(a)
1	24	The improved road to the light house at Windy Harbour and Salmon Beach has made a lot of difference and not harmed this area	Noted	2(b)
1	24	The squatters' huts throughout the national parks also need to be recognized as heritage value and steps should be taken to preserve not destroy them	The objective and strategies in the management plan provide for the protection of heritage sites. The historical significance of the huts has been assessed by heritage consultants. This is mentioned in section 27 p113. Part D will clarify this also and make mention of the recommendations of the report	1(e)
1	24	Huts at Donnelly River are part of our cultural heritage	As above	2(b), 2(d)
1	24	Balingup Hut must be saved	As above	2(b), 2(d)
1	24	There is also a need to recognise the heritage value of many of the squatters' huts and take steps to protect rather than destroy them	As above. Squatters' huts are also referred to in section 27 of the draft where the objective on p113 relates to your comment and states that useful huts or huts with recognised historic value will be retained	2(a)
1	24	I see the draft as being discriminatory against European heritage. Although an effort may be made to preserve Bolghinup and Coodamunrup huts, other huts of the same vintage will be removed i.e. Gardner/Mays	Noted, as above	2(d)
1	24	The Bolinghup Hut is heritage listed with the WA Heritage Council, contrary to information listed on p75 of the Draft Plan	The hut is included in the Heritage Council of WA's assessment program but is not listed	2(g)
1	24	Bolghinup Hut. This hut is now over 100 years old and is the only remaining example of its type (split jarrah slab walls, with open inside fireplace)	Noted	2(b)
1	24	Most non-indigenous heritage structures are of wooden construction and are extremely vulnerable to both controlled and wild fire. While it is acknowledged that these structures will not last forever, there is nevertheless an urgent need to take active steps to protect these sites from fire by the use of constructed breaks and fuel reduced surrounds	Noted. Specific actions to protect vulnerable structures are documented in prescribed fire plans for individual burn areas. Heritage protection will added to strategy 3 in the Fire section 22	1(e)
1	24	Bolghinup Hut. Is in a highly vulnerable situation and at very high risk of destruction by wildfire or escape from the internal fireplace (it is occasionally used by motorcyclists)	Noted. The Department has a conservation plan and maintenance program for the hut including regular inspections and remedial work to minimise the risk of wildfire damage. The final plan will clarify this as a strategy for the huts that are to be retained in section 24. There are also several burns planned for this general area over the next five years	1(e)
1	24	Bolghinup Hut. The adjacent fuels have not been burnt since the 1988 wildfire	As above	2(a), 2(d)
1	24	Bolghinup Hut. Over 25% of all fire in the parks in recent years have been lightning caused. The 1988 fire was caused by a strike only two kilometres from the hut	As above	2(a), 2(d)
1	24	Bolghinup Hut. Wildfires in that section of coast will be very fast moving (up to 5km/hr) so there is high chance that it would be unsafe for firefighters, given the poor access from the east Yeagerup Dunes [unsuitable for heavy fire vehicles]), and north (Bolghinup Track [impassable until mid summer, two bridges, unmentioned, overgrown track and very slow going]) it may well be four hours until the first trucks (with dozer escort) arrive at the hut site, and then only if it is safe for them to progress	As above	2(a), 2(d)
1	24	Bolghinup Hut. Fires from any cause may burn undetected for many hours before being reported	Noted	2(b)
1	24	Bolghinup Hut. There is no water supplies within 4km of the hut. This means a probable two hour turnaround to get water	Noted. Fire suppression activity could also include the use of water bombers and water tankers to reduce the turnaround time. Final plan will clarify this	1(e)
1	24	Bolghinup Hut. The only constructed vehicle access track to the hut is only accessible from mid summer when the swamps on Bolghinup Track have dried out	Noted, as above	2(d)
1	24	Bolghinup Hut. The only effective way of protecting the hut for the long term (>100 years) is to relocate it to the Manjimup Timber Park, where it can be repaired, protected in a covered shelter, and seen and appreciated by the thousands of tourists who visit there each year. This view is supported (in writing) by many of the earlier pastoralists, including Lionel Scott (now deceased) and Louis Scott, descendents of the first pioneering and grazing families in the district who relinquished the Bolghinup Grazing Lease in the 1970s	Noted. This action was considered and addressed in the Conservation Plan prepared for the Department in 2002. A specific recommendation was "The place be conserved as the location Bolghinup Hut in perpetuity. The relocation of the building, although it is feasible to dismantle and re-erect it, should not be contemplated except as a last resort of preservation..."	2(d)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	24	Bolghinup Hut. CALM management at Pemberton have indicated that they (and the State Heritage Commission?) would support the relocation of the hut if there was sufficient local public support. This can be arranged. A replica hut could be built on the original site as a memorial to the early pastoralists. If the relocation is refused, a specific person within CCWA or CALM must accept personal responsibility if it is destroyed by wildfire	As above	2(d)
1	24	Management of the Donnelly area as a heritage precinct in the first instance and as a recreation area secondly sets up opportunities to have it as a Park icon with reduced threat of further development. The nearby heritage assessed (highly significant) Bolginup Hut is seriously threatened in its current location and could be re-located to this precinct- I believe such a proposal would enhance the Donnelly, protect Bolginup Hut and receive strong local support	As above	2(d)
1	24	It must be pointed out that the so-called "Squatter's Huts" on the Lower Donnelly are part of the cultural heritage of the area. They should have been mentioned here as well as further through the document in respect to any government policy pertaining to them and their possible removal	Noted. This is reflected in Section 24, additional information on the heritage of the huts will be obtained by a formal heritage assessment	2(a)
1	24	The occurrence of squatters huts throughout the park is of significant historical, heritage and recreational value. The squatters huts at the Donnelly River for instance, have been built mainly of materials from old milltowns that no longer exist e.g. Shannon or old "Forest Department" settlements such as Wheatley, Glenoran etc. Collectively they represent significant historical and heritage values which are not replicated anywhere else in the South West - indeed, Western Australia	Noted, as above	2(a)
1	24	The Donnelly huts represent one of the best opportunities for the Commission to preserve, in partnership with a well organised and motivated community, cultural heritage that is rapidly disappearing in WA	Noted	2(a)
1	24	The Donnelly River hut precinct is worthy of formal assessment by the State Heritage Council for listing in the State Register of Heritage Places to be given legal protection under the Heritage of Western Australia Act 1990. Although assessment guidelines are focused towards buildings they do provide some scope for assessing non-building 'treasures'	The Department is aware that the hut precinct was added to the Heritage Council of WA's assessment program in July 2006	2(b)
1	24	Huts still exist along the south coast between Augusta and Eucla and whilst some are well maintained, most are 'ramshackle' with serious health issues especially in places like Wantine (south of Mundrabilla)	This is outside the scope of the management plan	2(c)
1	24	There is no reference to the Warren River 2 and 3 oil wells. These were the first oil wells drilled in Western Australia and warrant comment as being of historic value. It is noted that these are referred to under Mineral Resources, but their significance now is in their historical relevance. <i>Include reference to these oil wells as historical interest</i>	Noted. Amendment will be made to point out in section 24 that they were in the first in the State, however they are mentioned in paragraph 2 on p75	1(e)
1	24	According to the draft plan, protecting and conserving the non-indigenous cultural heritage of the parks will be achieved by protecting, maintaining and restoring non-indigenous cultural features of educational or historical significance. If this is the case, we do not understand why the Burnside Fire Lookout and as much as possible of the Shannon sawmill and town site have been destroyed. The bulk of this section of the draft plan is irrelevant to Shannon NP	Burnside Fire lookout was removed for safety reasons. A lot of information on the history of the Shannon townsite has been recorded and will be included in updated site interpretation over the next few years. It is also included publications such as the map and drive guide for the Great Forest Trees Drive, Shannon National Park and Shannon National Park visitor guide. The mill was closed 1968 and the infrastructure removed well before the current draft plan	2(c), 2(f)
1	24	The draft says the objective will be achieved by protecting, maintaining and restoring non-indigenous cultural features of educational or historical significance. Why then destroy as much as possible of the Shannon sawmill and town site? Why has the dam been retained and not the school house or community hall? The dam is not a natural feature and has a far greater impact on the environment! Apart from the dam on the Shannon River, all the retained non-indigenous heritage sites are in the D'Entrecasteaux National Park. Like most other sections, this part of the draft plan is irrelevant to the Shannon National Park	As above. The final plan will include more information on Shannon Townsite	1(e)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
	Part E			

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	Part E	WA Trout and Freshwater Angling Association recognises the need for sound management of Western Australia's National Parks, conservation parks and nature reserves. The development of a balanced management plan that ensures conservation values are upheld while access to recreational opportunities are maintained is essential if these areas are to be enjoyed by future generations of Western Australians	Noted	2(a), 2(b)
1	Part E	Promotion is urgently needed for all of Australia's national parks. People have very little understanding of the need to protect our environment and the lengths that need to be taken to do so. Consequently they resist any sense of control and the cost of national park passes. TV, radio, newspaper and possibly magazine advertising is urgently needed. The promotion is needed before people embark on a holiday. Localised CALM brochures are excellent, amongst the best, but they are aimed at people already in the region, their plans having already been made. Tourists need to read up about their responsibilities before they even plan their holiday, let alone start out on it. We hear more about Fraser Island and its dingo problem than we do about the fragility of our own state. People will be pleased to cooperate but only when they understand what is needed on their part	This is a valid point, however it is out of the scope of the management plan. Your comment will be forwarded to our Corporate Relations branch. There is a <i>Going to the Coast - D'Entrecasteaux National Park</i> information guide available from DEC offices and NatureBase. There is also a magazine called <i>A Guide to the Southern Forests</i> available from the Region and other neighbouring regions	2(c)
1	Part E	Too much emphasis on recreation	Recreation is an important of national parks and management needs to ensure the natural, cultural and other recreational values are preserved	2(e), 2(f)
1	Part E	As a general comment, there are a lot of actions (this will be achieved by:) that require planning time allocated, staff resources and budget to implement such as the installation of signage, that you may not achieve in the time of this plan. Does this leave CALM open to criticism and litigation?	All actions are subject to budget and resourcing, it is the role of the management plan to direct action and then the Department to set priorities and direct resources	2(c)
1	Part E	A key issue is the encouragement of visitors to regional/state attractions such as Point D'Entrecasteaux and the lack of sufficient funding to the Council to meet traffic impacts from non-local usage	The parks benefit local communities by increasing visitors to the area and by providing nature-based recreational opportunities for all	2(c)
2	Part E	In general terms, all access provision and recreation activity should be subservient to preservation of natural systems (including landscapes), that management of the parks should move more quickly towards internationally established national park best management and that damaging, unsustainable and inconsistent uses that pre-date the establishment of the parks should be quickly phased out. Part E of the DMP is to be commended for having this general thrust even if it is, at times, indirect	Noted	2(a)
1	Part E	WA is extremely well positioned in terms of eco-tourism and we need to make the most of this. We need to look ahead and think about what WA can offer globally that is unique and will attract visitors to the South West. As our planet becomes increasingly urbanised, as is already happening, people will increasingly seek out an escape as different from their urban lives as possible. Wilderness is exactly this. People already and will increasingly so, want as remote and as 'wild' an experience as possible that is still accessible. People will not want to travel 4 hours from Perth to sit and listen to the continuous droning of motor boats - we can do that anywhere! We must not let the convenience of the minority of locals ruin an amazing area that could offer an international (and national and local) ecotourism experience	Noted	2(a)
1	Part E	Less negatives, more positives. It appears that this plan is negative toward recreational use. It seems as though the plan was drawn up with an agenda to restrict and in some cases stop recreational use in the D'Entrecasteaux National Park. It also appears that the advisory committee consists of a group of people of associated with the green side of politics and not a wide representation from the general community who use the National Park and Lake Jasper, for example the members of KOCO	The draft plan proposes more and better sited camping areas, better sited day use areas, and more walking opportunities. The management plan seeks to restricts recreational activity that is impacting on the other values of the parks, and the advisory committee were definitely of differing viewpoints in some areas but were able to come to an agreement. The Advisory Committee included members who were from a wide variety of interests including members who were affiliated with KOCO and the 4WD associations	2(e)
1	Part E	We are concerned about the progressive tightening of access and use of the park that appears to occur with each new management plan. We do not agree that these increased restrictions are always justified and seem frequently to be based on philosophical conviction than logical arguments	Decisions to rationalise access or restrict recreational opportunities are not taken lightly and are the result of considered deliberation and negotiation with local communities, wider community and stakeholders noting the expected increases in local and tourist populations	2(e)
8	Part E	The report states that the parks currently attract an injection of \$62 million to the local economy. The aim should be to increase this figure even higher rather than lessen it by closing off large sections for activities other than walking	The candidate wilderness areas are already only available to walking. The aim of the national parks is to provide recreation that does not impact on the conservation values of the parks and it is not the role of the Department to put financial gain ahead of this aim	2(e), 2(g)
8	Part E	The recommendations in the plan do little to promote either the economic or social components of Government's policy to encourage all Departments to follow the triple	As above	2(e), 2(g)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
		bottom line		
8	Part E	We reinforce that all State government departments should be aware of the 'triple bottom line' concept and have equal proportions on the environmental, social and economic aspects of the parks and that they should be a recreation resource used to educate and be enjoyed not just closed and conserved	As above	2(e), 2(g)
1	Part E	Whilst the parks have been identified as an important source of recreation, in particular for the local community, recreational opportunities are the reason why so many local and other people visit the area. The Shire of Manjimup has the greatest span of coastal area, approximately 125 km than any other shire within the south west and access is only through national parks, therefore there is an obligation by CALM to give a high priority to the recreational objectives of park management and provide the full range of recreational activities provided	As above	2(e), 2(g)
1	Part E	We support the comment (p77) that the parks are "...an important source of recreation...in particular for the local community..."	Noted	2(a)
1	Part E	Access to our rivers, forests, lakes and beaches has been part of the social fabric of the Warren District since settlement	Noted	2(b)
1	Part E	In the draft we read of several issues that do not matter to any other person than those it directly affects, a small group of people that live right on the door step of Shannon and D'Entrecasteaux National Parks. How is it that city people have access to Settlements, Parklands, Beaches, Rivers, Lakes, Tracks, all in national parks close by to them, to enjoy at their leisure and with their families whereas we in the country have to fight to do the same?	"City people" do not have the same experiences in national parks close to them, they have to travel considerable distances to enjoy the same remoteness and natural beauty as experienced within the Shannon and D'Entrecasteaux national parks. City or country people alike have the same opportunity to use the parks for recreation that is compatible with nature conservation	2(b), 2(c), 2(e), 2(g)
1	Part E	Look after the local public and visitors will follow suit	The Department's role is to treat all park visitors equitably	2(d)
1	Part E	We believe that any change that significantly impacts upon the social environment and fabric of our lives may be detrimental in the long term. To appreciate this, you must have an understanding of the not inconsiderable differences between the rural youth and those who live in the cities and larger regional areas where the choice of activities tends to be much greater and more varied	The choices in rural as opposed to urban areas, granted are different but that is presumably what attracts people to some areas over others	2(c)
1	Part E	If the general public is denied usage of the areas described in the Draft Report, interest in national parks will decline to the detriment of all conservation objectives	If you are referring to water skiing and horse riding, then this is a small percentage of the general public	2(d), 2(e)
1	Part E	We do not have a problem with tourists wishing to fish on our beaches as long as there is a campaign showing them how to respect the beaches, the flora and fauna by using designated tracks and walkways and country towns they travel through. This way they can also look forward to and enjoy utilizing our coast	Most beaches in Australia are owned by the Crown and managed by various Government agencies, it is recognised that local communities feel a strong sense of ownership, but this should not exclude others, and all people should be respectful of the coast. The management plan proposes to foster this respect	2(a), 2(d), 2(f), 2(g)
1	Part E	Inadequate recreation policies and enforcement, resulting in widespread compliance issues and conflicts between park users and managers	Compliance issues do not lead to abandoning policy and enforcement	2(d), 2(f)
1	Part E	In addition to not closing off access to existing points of interest or activity, I encourage CALM to spread the potential impact of overuse by opening up additional areas of the Parks. I also encourage CALM to lobby the State government for additional resources to allow the parks to be managed in a "people friendly" manner - not close off areas as the best option for future management	There is still a range of opportunities for many recreational activities and still numerous recreational sites within the parks	2(d), 2(f)
1	Part E	This submission would also like to make the point that as custodians, acting on behalf of the community, it is essential that adequate resources are made available to achieve the goals and outcomes desired by the community. It is not acceptable to exclude sections of the community from sustainable recreation activities simply due to lack of management resources	It is usually the case that the activity is not sustainable	2(d), 2(f)
1	Part E	We have put forward to Government many times before that National Park areas should be made available for use by members of the public for recreational pursuits and appropriate management processes put in place to control where necessary such activities	This is the case, however the appropriate management processes may not always be what you agree with, not all people will be pleased all time	2(a), 2(d)
1	Part E	This submission recognises that all recreational activities within the parks needs some regulation to reduce environmental impacts, however these recreational activities can and should be accommodated within the management plan. This submission encourages park management to engage with regular users and interested parties to find practical management strategies rather than the prohibition policies that have been adopted	Not all recreational activities can be accommodated, sometimes they have to be conducted elsewhere, where impacts are more appropriate	2(a), 2(d)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	Part E	The effect on ecosystems and the environment is repeatedly used as an argument to curtail activities that regular visitors have done for many years and even generations. While conservation values are clearly extremely important to the management of these areas, park managers need to adopt realistic policy and management strategies that can be achieved rather than the esoteric and idealistic goals that seem to be adopted	Visitation is increasing and in order to maintain the values, some activities that are not appropriate need to be restricted or removed. It is not valid to continue damaging activities just because they are existing	2(d), 2(e)
1	Part E	Leave the huts alone. Leave the tracks open. Let us camp, fish etc as we have for over 100 years	As above, also it is the Department's responsibility to manage activities so that they do not impact on these areas conservation values	2(d), 2(e), 2(f)
1	Part E	All elite sports within both national parks operate at all times under the guidance of an accredited tour operator and only after CALM has undertaken an environmental study, especially examining the possible presence of endangered fauna and flora	This is not always the case	2(g)
1	Part E	There is a glaring omission in this plan that the only tourism effect is within the park. Not so, the activities within the park may explain some of the attractions to tourist, both local, interstate and international but there are more attractions surrounding the park which also need to be considered before any activity is curtailed. Like not stocking any more trout, the reason for my submission as I am totally against CALM doing so	See responses within the fishing section further in this document	2(c)
1	Part E	Suggestion: That Manjimup Shire or CALM place mini skip bins at two or three strategic exit locations at long weekends, Easter etc to encourage rubbish removal from bush e.g. Pemberton/Manjimup turnoff truck bay	This suggestion has been considered before by park managers and has some merit. However it becomes difficult to manage in the longer term and often becomes a convenient point for people to drop off their domestic rubbish. The most effective way is for people to take home their own rubbish and 'leave no trace'	2(d)
1	Part E, fees	National Park Fees - Include reference to the fact that the State Government has waived fees for Leeuwin National Park	Not relevant, entry fees are charged for entry into national parks in approximately 30 other national parks in the State	2(c)
1	Part E, fees	We seek a long-term commitment from CALM for a fee exemption for locals and preferably an overall fee exemption to access the National Parks	National park access and usage fees are the subject of Government policy and legislation and beyond the scope of the plan. However, the fees are used directly back in the parks of the area maintaining their facilities and for implementation of conservation and education programs. National parks are an important part of the local tourism economy and benefit the local community in excess of the contribution locals may make to fees. The cost of any annual park pass for all the parks in the Warren area is only \$20. You can also access Windy Harbour Beach and Broke Inlet without entering the National Park or paying fees	2(c)
1	Part E, fees	Park Passes - collection of monies to enter the D'Entrecasteaux National Park should not be applicable to the local people of the Warren and Nannup Shires. Our city counterparts do not have to pay entry fees to go to any rivers or beaches in their area The national parks were formed around us, regardless of whether we wanted them or not. The building of steps, campsites and toilets do not warrant a collection of fees, when we have managed for generations without them. To me this is not 'management'	As above	2(c)
1	Part E, fees	Financial: Leeuwin Naturaliste National Park, 18 million visitors @ \$9/head = \$162 million which nobody paid. D'Entrecasteaux NP: 83000 visitors @ \$9/head = \$747,000 which was paid. Either everybody pays or nobody pays! Get Real!	As above	2(c)
1	Part E, fees	There is an inconsistency by the State government in the application of national park fees for various national parks in the south west, including that the State government has waived fees for the Leeuwin-Naturaliste National Park. This inconsistency is unjustified and effectively discriminates against local residents in the Shire of Manjimup	As above	2(c)
1	Part E, fees	The beaches in these areas are my local beaches. No way should anyone have to pay to access them Premier Gallop has publicly stated that West Australians should have access to their beaches	As above, the beaches are part of the national park other than Windy Harbour Beach which is not part of the parks	2(c)
1	Part E, fees	As a supposedly free country (something I often question) the coastline and its fishing areas should be free to all Australians	As above	2(c)
1	Part E, fees	Upon travelling to the city I do not see a fee imposed to use the beaches	As above	2(c)
1	Part E, fees	So far as I am concerned the upkeep of our coastline should be maintained through our taxes not levies imposed at each site	As above	2(c)
1	Part E, fees	The coast should be free to all Australians not just those of Aboriginal descent	As above	2(c)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	Part E, fees	It is suggested that the public are not charged any fees/charges to access the coast provided they do not camp overnight	As above	2(c)
1	Part E, fees	A fee should be charged and quotas should apply	As above	2(c)
1	Part E, fees	Fees should not be charged to go on local beaches	As above	2(c)
1	Part E, fees	Living next to the park I am disappointed that I should have to "fight" for the privilege to enter our own park e.g. no charge for Kings Park or their walkway	As above	2(c)
1	Part E, fees	The majority of people who use this area, particularly the beaches, are south west locals, who are also called tourists. It is clear in the plan that tracks are to be closed and access restricted so it is easier for the department to man toll gates and charge for access. Access to all beaches should always remain open and free of charge. At the moment, the only beach in the national park that we can access free of charge is Windy Harbour. However, you do not have to pay to access beaches in national parks from Augusta to Perth and beyond. This is unfair. I and my family feel offended that we have to pay for something that is an Australian pastime	As above	2(c)
1	Part E, fees	Local communities in the southwest are restricted in the activities they can do because of the distance factor i.e. movies, sport, the arts and general family activities. They need to be able to use beaches, national parks and state forest for recreational uses regularly. National park charges should be dropped for locals, the same as has happened at Margaret River	As above	2(c)
	25	Recreational Opportunities		
	25.1	Regional Recreational Context		
1	25.1	P78. The availability of access is the most important factor in determining where recreation activities occur. Access combined with a natural feature gives a popular recreation opportunity	Noted	1(e)
1	25.1	It is worthwhile noting that of the entire area of the Shire of Manjimup just 15% of the land is rateable. With the introduction of additional national parks and reserves within the Shire's boundaries, of the remaining 85% of the area of the shire is now implicated in national parks and reserves, the remaining area being forest and heath lands	Noted	2(b)
1	25.1	Amend 2nd sentence in paragraph 1 to read: "Recreation opportunities within the South West Planning Region are varied and numerous, although many are nature-based and include four-wheel driving, scenic driving, mountain bike and trail bike riding, boating, walking, caving, climbing, sight-seeing, camping, swimming, surfing and picnicking"	Trail bike riding is generally seen as inappropriate activity as these bikes often leave the track. The plan adequately reflects the use of licensed motorbikes and mountain bikes	2(d)
2	25.1	p77 para1: Expand '...biking, boating..' to distinguish self-propelled from motorised and distinguish between on and off roads. <i>Re-word: '...motor cycling, power boating, bicycle touring, mountain biking, canoeing...'</i>	As above, power boating is not considered nature-based	2(d)
2	25.1	p78, Para1: In the SW region generally vehicles are not prohibited from beaches, except in limited places in the Leeuwin-Naturaliste NP, due often to conflict with swimmers and other beach users. The historical pattern is that if vehicles can physically reach a beach they have had access to it. (This is true of virtually all the regions and landscapes in Western Australia). There are (from walking the entire coastline) only two beaches (not small coves) between Cape Naturaliste and Torbay that are physically inaccessible to 4WD vehicles and possibly motorcycles. D'Entrecasteaux is therefore not unique in providing beach driving opportunities so, although it is a prevalent use of the park's beaches, the plan should not place emphasis on 'unique beach driving opportunities' and planning decisions should not be dominated by this historical access	Noted, however there are a number of beaches that are inaccessible to vehicles in this region (refer to management plans for Walpole-Nornalup National Park and Leeuwin-Naturaliste National Park). The draft states the area is an important (not unique) area for coastal driving. Planning decisions have not been entirely based on historical use and have taken into account sustainability and impacts on park values	2(d), 2(g)
1	25.1	p78. I'm not sure what the second paragraph is saying	It is highlighting the limited opportunities for non-nature-based recreation, which then puts added pressure on the parks	1(e)
1	25.1	Amend paragraph 4 to include reference to trail bike riding	Trail bike riding is generally not seen as being compatible with the conservation values of the park. The existing description adequately covers the use of licensed road bikes and mountain bikes	2(d)
	25.2	Visitor Numbers and Trends		

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	25.2	We believe the ever increasing numbers of visitors is an issue arising from the management of the national parks	The Department does not control all promotion of the parks	2(g)
1	25.2	It has been stated in the draft plan that the parks are within the most visited area in the State but your own figures show the D'Entrecasteaux has the lowest visitor numbers of 81,000	The draft on p3 states that the parks are the 5th most visited National Park in the region	2(g)
2	25.2	p78, Para 2: To quote a number of 58,589 visitors implies that every last person was counted! How about rounding this to 'approximately 60,000' to at least reflect the data collection process?	It does not refer to visitor numbers, rather visits	2(d)
2	25.2	This section must make mention that D'Entrecasteaux park is widely used by high school bushwalking expeditions, and others, as part of secondary and tertiary outdoor education programmes. (This is mentioned but it should be included here for balance). Outdoor Ed is acknowledged as an important part of the education experiences of today's youth and the D'Entrecasteaux Park remains the outstanding SW location for these programmes	Noted	1(e)
1	25.2	It is highly likely that the analysis of visitors and their interests will underestimate the number of trail bike riders using the parks. Many trail bike riders enter and exit the parks via minor or obsolete tracks and would not pass traffic counters or spend time at popular picnic areas where surveys might be undertaken. Given the uncertain status of trail bikes within the parks, it is reasonable to assume that riders would tend to avoid rangers or others asking questions	Noted	2(b)
1	25.2	Include in this section a reference to trail bike use within the parks and the difficulty in obtaining accurate numbers		1(e)
1	25.2	P79. No mention is made of the public meetings held at the start of the planning process, and the issues that were raised then. Were "Have Your Say" forms distributed? The survey wasn't distributed in the Frankland District at all	The meetings are referred to in section 42. The Have your say forms were not used at that time	2(b), 2(d)
	25.3	Visitor Management Settings		
1	25.3	Given that much of the park will be wilderness or surrounding wilderness, I strongly oppose any further development of modern society infrastructure	Noted	2(a), 2(d)
8	25.3	I fully agree with these comments on recreational succession however to reduce areas in which one can visit will only put increased pressure on those parts that can be accessed	The candidate wilderness areas are already only available to walking	2(g)
2	25.3	p79 para 2: '...neighbouring parks and forests...' should be expanded to read: '...neighbouring parks, coastlines and forests...'		1(e)
2	25.3	p80 para 1: 'It is hoped...' 'Hoping' is not a management planning process! The statement should read: 'This system will be used to assist the preservation of natural values and wilderness characteristics that give the parks their unique value'		1(e)
1	25.3	p80. There's no discussion on what makes up a visitor management setting, i.e. physical, social; and economic components	This is provided in an appendix both in the draft and in the final	2(g)
1	25.3	The limitations of the VMS system are also not discussed, i.e. small sites in a developed setting have no protection	The designation of recreation sites protects small sites	2(g)
1	25.3	It's hard to comment on VMS without a map	Noted	1(e)
	25.4	Wilderness		
1	25.4	We generally support the concept of retaining 'wilderness' areas, described from p80 in your draft plan, but are concerned that much of the philosophy relating to 'wilderness' appears to come from parts of the world where it is much less arid, and where the bush is not as thick or as hard as it is in Western Australia, especially in parts of these two National Parks. Bushwalkers who are said to be 'free to walk' wherever they wish, are in fact limited by water availability and the ability to prove water availability, and to the availability of 'holes in the bush' some created naturally, and some created initially by foresters or occasionally oil drillers and miners, and maintained by an appropriate fire hazard reduction programme. We are very concerned that efforts to enhance 'wilderness values' too often lead to use being locked out of the bush	These areas that were chosen as candidate wilderness areas already had low visitation, so there should be little change in visitation. The gazettal will ensure that this remains the case over the life of the plan	2(d)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
3	25.4	There is no need or justification for the creation of wilderness areas within the parks. Such flowery phrases as "there is a growing awareness from within the community and scientific world that wilderness areas support values..." etc mean absolutely nothing. What are the scientific values protected by wilderness that are not protected in a nature reserve or national park? The real truth is that some greenies want the parks closed up to suit their narrow minded ideological purposes and to exclude local people who they regard as inferior. Who are the people who want it? Where is the scientific justification? The fact that you provide no answers to these questions indicates there are none. The concept is just something in someone's mind and makes them feel good	As the DMP states, a wilderness area will maintain the widest range of options for the future. A national park may have roads, buildings, facilities and services which provide a different experience than within a wilderness area. Development may incrementally creep to the more developed state within a national park, and gazetting areas as wilderness preserves the remote state for future generations A more complete discussion on the principles of wilderness is provided in the Department's wilderness policy which was out for public comment June to August 2003. The policy and analysis of public submissions to the policy, can be downloaded from: http://www.naturebase.net/content/view/82/1132	2(c), 2(e)
1	25.4	Why do we need more wilderness areas and national parks?	See the Department's wilderness policy for justification for wilderness in general	2(c)
1	25.4	Management should continue as national parks are now. If this area is locked up as a wilderness how can it be maintained?	As above	2(b), 2(e)
1	25.4	Not necessary to make a wilderness	As above	2(e)
3	25.4	If CALM or the Conservation Commission can come up with a single justification based on ecology, bushfire management or silviculture to support its recommendations to create large wilderness areas, then it should give them. If it considers that the opinions of the environmentalists who demand wilderness areas are more important than those of local communities who do not want them, then you should come straight out and say so, not hide behind flowery words	As above	2(c)
1	25.4	Do the Australian public (including Aboriginals) benefit from wilderness areas as opposed to national parks? If not who does?	As above	2(c)
3	25.4	The current management system and access has been working well since the inception of the first national park plan. Why change it?	As above	2(c)
1	25.4	The Conservation Department has an appallingly bad record of looking after such Wilderness areas and national parks. This is probably due to a lack of funding, but if the Government wants more wilderness areas and national parks then they should fully fund it and not charge locals for beach access. The beach is part of the Australian way of life and should not be used as revenue-raising	There are no gazetted wilderness areas in Western Australia as yet See discussion on fees within the <i>General</i> section of this APS	2(e), 2(g)
1	25.4	Locking areas up does not mean it is protected from damage. This has been proven by the Nuyts fire which even CALM reports say will take 60 years for the area to recover. In this fire, quokkas jumped off the cliff into the ocean; the noisy scrub bird population was destroyed and all biodiversity up to 300mm deep in the ground was destroyed. Continued human access could never have done this much damage	Noted, however the Nuyts area is not a valid comparison as the Nuyts "wilderness" zone within Walpole National Park was not gazetted wilderness although it had several wilderness management objectives. In fact the Nutys area does not meet the criteria for classification as a wilderness area as defined by Departmental policy, therefore it is not being considered for gazettal in the <i>Walpole Wilderness Area Draft Management Plan 2006</i> Another difference is that the Nutys area was designated a "no planned burn" area in the <i>Walpole-Nornalup National Park Management Plan 1992</i> . Whereas prescribed fire will be routinely applied to gazetted wilderness areas within the parks to manage fuel accumulation rates	2(c), 2(d), 2(e)
1	25.4	My main concern by making heritage sites in the southwest will only place more pressure on other sites causing more damage there. Everyone should be able to enjoy the coast, the forests and lakes. It should not be locked up as wilderness area for a few	These areas that were chosen as candidate wilderness areas already had low visitation, so there should be little change in visitation. The gazettal will ensure that this remains the case over the life of the plan	2(d), 2(g)
2	25.4	p80 para 3: It should not be necessary to add the words '... if any..' in this sentence. It can give the impression that the whole process of identifying potential wilderness areas is being undertaken as a token gesture to wilderness advocates when it deserves equal weight to any other planning area	All management planning processes now consider areas for wilderness, however not all planning areas will contain sufficiently large areas with wilderness values, and in some cases there may be reasons why candidate wilderness areas may not be gazetted. Therefore, the words "if any" indicate that the planning process may determine that there are no areas that are appropriate to be gazetted	2(d)
2	25.4	p80, 3rd last para: '...and that 4wd access is available on some of the beaches.' should be reworded to reflect the true situation that it is available on nearly ALL of the beaches	Noted	1(e)
1	25.4	Map 9 - The area set aside for wilderness is not pristine. I drove cattle in one lease, mended fences as other people did on Brockman's; French's; Dunnetts. All rode horses to service these leases	Noted	2(d), 2(g)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	25.4	I would like to further recommend the addition of the area surrounding Lake Quitjup to include all of the area that is rated 16 on Map 9, Wilderness Quality. I understand there might be concerns about doing this given this is a small area but it is adjacent to the sea which means it could be considered according to CALM's Policy Statement 61 - Identification and Management of Wilderness and Surrounding Areas. I also understand that it might be difficult to protect as wilderness because of ease of access along the beach and the consequent need to close access and the difficulty of monitoring this. Nevertheless I suggest adding this to the other proposed wilderness areas and protecting it at the highest level, knowing that some people will not do the right thing, but the majority will, would ensure the best possible protective outcomes for this special area	<p>The area around Lake Quitjup does have high wilderness values, however please note the wilderness values require minor updating to reflect the impacts of mining and dairy industries in the vicinity. There are also many exploration drilling tracks through the area and the area is in close proximity to the high visitation areas of Black Point and Lake Jasper</p> <p>As you mention the area is less than 8000 hectares, in order for the area to be gazetted, the wilderness area would have to extend to the coast and Wapet Track would have to be closed. For all other areas to be gazetted, there is no need to close any public access. Access to the private property nearby will have to be maintained</p> <p>Also there are already four wilderness areas proposed to now be gazetted that are over 8000 hectares which will provide wilderness experience in the parks, these areas will not require any public vehicle access to be closed and are remote from high visitation areas</p> <p>Whilst it is not recommended to gazette the Quitjup area as wilderness, the area will be covered by a visitor management setting that will maintain the current remote values. This setting will take into account the nodes at Lake Jasper, Black Point, the long term management of the Black Point camping area and Jasper Beach</p>	2(d)
1	25.4	There should be an additional wilderness area declared around Lake Quitjup (south of the land and east of Black Point Road). The areas including and north of Lake Quitjup, as well as Lake Jasper, should be evaluated for wilderness quality for potential inclusion in this area also. This area has the highest wilderness quality of any area in both parks, with a wilderness quality of 16 (Map 9). The area is less than 8,000Ha however it is contiguous with the sea. The area is remote from any permanent settlement. Black Point Road provides 4WD access through the proposed wilderness area. Wapet Track and Jasper Beach Track provide 4WD access and Jangardup Road provides limited 2WD access to the area south and east of Lake Jasper. At a minimum, Black Point Road would need to be sign-posted and closed off from the general public. The area has a high level of apparent naturalness and biophysical naturalness	As above	2(d)
1+913	25.4	Would also like to see additional Wilderness area around Quitjup which has the highest wilderness quality in both parks	As above	2(d)
1	25.4	P80/81. In the discussion of possible wilderness areas there's no mention of other proposed wilderness areas and what the landscape character of those areas is. I would suggest a variety of wilderness areas across the state would be good, so maybe wilderness areas that compliment rather than duplicate the existing wilderness opportunities would be appropriate e.g. coastal wilderness areas are needed	Noted, this is considered on a regional basis, the wilderness areas in D'Entrecasteaux National Park do not duplicate those proposed in the Walpole Wilderness Area	2(d)
1	25.4	Until this plan was produced, the public were never told of any proposed wilderness areas other than the Walpole Frankland and Nuyts Wilderness areas. Surely the public should be consulted prior to drafting any plan	<p>There have no wilderness areas gazetted in Western Australia. Other management plans have included wilderness zones, including as you mention the Nuyts "wilderness" zone</p> <p>The Department's wilderness policy introducing the Department's aim to gazette wilderness areas within the State was released for public comment in June 2003, predating the draft management plan by nearly 2 years</p> <p>There is some public consultation prior to a draft management plan being released, in the formulation of a community advisory committee, however the draft management plan is the major phase of public consultation in the planning process</p>	2(g)
1	25.4	Greater clarity needs to be provided regarding the proposed interaction or prohibition of access to the beach north of the Warren River mouth given the Yeagerup Wilderness area. The final management plan needs to strengthen CALM's resolve to appropriately address the matter	As shown on Map 9 the wilderness area does not include the beach and there is no proposed change to the beach access north of Warren River as shown in Map 10 of the DMP, this will be made clearer in the final	1(e)
1	25.4	What is the Department's Policy Statement No. 62?	As per draft, it is the Department's policy on wilderness. It can be viewed at http://www.naturebase.net/content/view/82/1132/	2(b)
1	25.4	The draft document does not provide comment on the principles or management practices associated with wilderness areas, only the location area	There is a general guide on page 81, but as the draft states, the Department's policy statement 62 has more detail. At the draft stage, only candidate areas were identified. The final management plan includes more detail for the specific areas to be gazetted	1(e)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	25.4	CALM's recent adoption of the 'Identification and management of wilderness and surrounding areas' policy sets out a road forward for managing and protecting areas as pristine and diverse as those found in Shannon & D'Entrecasteaux National Parks	Noted	2(a)
1	25.4	More control burning should take place to prevent damage to national parks from wild fires. It is ludicrous if an area is locked up for 30 years and destroyed by wildfire (like the Nuyts wilderness) and then take 60 years to recover. This is not protection. Is a wilderness pristine after it has been destroyed by fire?	The draft states that prescribed burning within wilderness areas may be carried out for the protection and maintenance of biological values and processes	2(g)
1	25.4	In the document, fire management described for wilderness areas is contradicted (p80-81)	General principles for fire management with regard to wilderness was presented on page 81, there does not seem to be any contradiction	2(b), 2(g)
1	25.4	Malimup Communique. I do not agree with setting up Wilderness areas. Government should take heed of pre and post Aboriginal practice	As per the draft, management will be consistent with the Malimup communique	2(d)
2	25.4	p81, dot points, mid page: There is a persistent attitude amongst land managers, illustrated well in this policy, resisting the closure and rehabilitation of existing vehicle access tracks. The usual reasons given are possible emergency response access to protect life, property and nature, or essential management access. It is always possible to argue a case on the first reason least. The fact is that the presence of any track degrades wilderness value and makes the decision not to use available vehicle access (legally or not) more difficult, potentially perpetuating the situation. The wilderness areas identified in the DMP are very small. On any basis tracked access is unnecessary and inappropriate	There may be instances where management access is required for fire management, threatened species monitoring, disease management, weed control and/or pest control. However, the network of existing tracks will be assessed for rehabilitation as there may be unnecessary tracks within these areas	2(d)
1	25.4	It is inappropriate to allow 4WD access on all beaches between wilderness and ocean. Recommend no 4WD access into Yeagerup and Malinup wilderness	Beach access will be provided for as provided for in the draft management plan, it would be too difficult to prevent vehicle access along the beaches in these areas	2(e)
1	25.4	There is local community concern as to the long-term implications of the wilderness areas including impacts on future vehicle access. We are keen to clarify CALM's longer term intentions regarding the wilderness classification and what this will mean regarding future vehicle access	There is currently no public vehicle access in the candidate wilderness areas, this will be maintained when the areas are gazetted and will remain the case for as long as the areas are gazetted, which is the intention of the Department for as long as the management plan is in operation	2(b)
3	25.4	Existing tracks in the proposed wilderness areas were usually not located there by accident but often to access certain places (usually located in the only position dictated by environmental conditions - steep slopes, swamps etc) or from past fire suppression operations	As above	2(b), 2(g)
3	25.4	Any restrictions reducing access (without good environmental justification) to the general public for recreational purpose must be resisted	As above	2(d), 2(g)
3	25.4	Wilderness areas will only impose additional constraints on fire management and with the possible closure of some tracks will jeopardize future prescribed burning and suppression and general (feral animal, weed control etc) operations	Yes, where possible ground disturbing activities will not be conducted within wilderness areas. However prescribed burning may still be carried out and appropriate fire strategies will be maintained on the perimeter of the areas to protect life, property and biodiversity. Management access will also be maintained for other operations such as pest and weed control	2(d), 2(e), 2(g)
1	25.4	We are particularly concerned that any declaration of wilderness areas will inevitably make it more difficult to address issues such as weed invasion, feral animals and disease	As above, management access will be retained in wilderness	2(d), 2(e), 2(g)
1	25.4	Bushfires in forest country (and especially in the heavy karri country) cannot be fought successfully from the air. It is nonsense to think this way. You need to get in with bulldozers, heavy duties and men on the ground. To do this you must either have (i) an existing network of well-maintained roads, or (ii) you must construct new roads at the time of the fire. It appears to us that you have opted for the second approach. If so, then you have opted for the more environmentally damaging approach	The Wilderness Policy does not preclude tracks being maintained for management access and essential access will be maintained. Fuels in surrounding areas will be managed so that the risk of a fire escaping from the wilderness area into the surrounding area and vice versa is minimised and the values of the wilderness are protected. In the event of a wildfire occurring within a wilderness area, the Regional Management will determine on a case-by-case basis whether to allow a wildfire to burn out to the existing roads and tracks or to carry out ground disturbing activities to contain the wildfire. In many cases the former may be the more acceptable option. However, if the latter is judged to be the best option, then approval for mechanised access for wildfire suppression will be sought from the Department's CEO. The final management will include the above direction	1(e)
1	25.4	Roadless areas in heavy forest country are unsafe for firefighters and bushwalkers. In our view there is a high likelihood that the Conservation Commission will end up faced with litigation if you deliberately establish wilderness areas which threaten safety, and subsequently a team of firefighters or bushwalkers are trapped and burnt	Only the Chesapeake and Pingerup Candidate Wilderness Area contains areas of forest. Fire management in wilderness areas will continue to focus on biodiversity and the protection of life and property. Note that establishing wilderness areas over the Chesapeake and Pingerup areas will not be pursued.	2(e)
2	25.4	We oppose any wilderness areas because it reduces access for fire management and feral and weed control which are more harmful to the environment than motorized	As above, access will be retained for feral and weed management purposes. Prescribed burning will still occur and wildfire suppression will be managed as per discussion	2(g)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
		access	above	
1	25.4	All existing roads and tracks in the proposed wilderness areas should remain open for vehicle access. This is a must for fire protection, beach vehicle access, scientific and recreational use for the local community	As above, there is already no public vehicle access within the candidate wilderness areas, and management access will be retained	2(g)
2	25.4	We oppose any wilderness areas because it reduces the flexibility for access involving dieback disease (Phytophthora cinnamomi) presence and dunal system development	Noted, however if a track needs to be relocated due to dunal movement or because of disease, and the only option is through a gazetted wilderness area, then the management plan can be amended if the Department assesses the recreational value of the track to be greater than that of the wilderness	2(e)
2	25.4	We oppose any wilderness areas because it can have a detrimental effect on future access routes to boundaries of reserves (e.g. Windy Harbour) as it impacts on wilderness values of adjacent areas	The candidate wilderness areas identified do not affect access to shire reserves or private enclaves	2(g)
1	25.4	The policy of closing tracks in the areas classified as Wilderness and the prohibition of mechanised transport will be significantly easier to achieve effectively if clear alternatives can be provided	There is access provided to all the recreation sites in the plan area, gazetted wilderness will not impact upon this	2(g)
1	25.4	Mean what you say. Proposed - candidate. What a load of dribble. You are really saying eventually you will close road to beaches	As above, beach access is provided for	2(g)
1	25.4	As CALM and others are aware, there are also many instances where the alignment of the road/track is not located within a road reserve. We seek clarification as to possible implications of long-term vehicular access, in such instances, through areas that may become gazetted as 'wilderness'	Candidate wilderness areas have been designed with a buffer from road reserves. The actual alignment of tracks should not exceed this buffer	2(b)
1	25.4	Where any Shire managed road is near a proposed wilderness area, We seek a suitable setback for the commencement of the wilderness of at least 100 metres. This will better enable the Shire to undertake its obligations for the management of the road and associated road reserve (including road works, drainage and possible realignment)	As above, we have used a buffer of 500 metres to locate candidate areas	2(b)
3	25.4	If existing tracks (currently used for fire and other management) are closed to enlarge areas for wilderness areas, walkers will only walk the perimeters of the area, not through it, in which case they will still make contact with vehicles, something they apparently seek to avoid. Therefore the whole exercise is self-defeating	Walkers in gazetted wilderness areas are supposed to walk on unformed tracks, this is part of the wilderness experience	2(g)
2	25.4	p81, last dot point: 'The taking of forest produce...' is a fine example of 'relictual wording' from policy days past! Shouldn't this be expanded to include 'all components of the natural system'?	This links in with section 39. All No flora or fauna can be 'taken' in accordance with the Wildlife Conservation Act anyway	2(a)
2	25.4	p82 key point 1: add words as follows '... and four wheel driving, vehicle based camping and bushwalking opportunities provided by the parks'	Not all camping in the parks is vehicle based, for example the Bibbulmun Track camping huts. Bushwalking will be added	1(e)
2	25.4	p82 key point 4: add words as follows '...available in neighbouring parks, forests and along coastlines across the region'	Will be amended to refer to tenures as opposed to landscapes	1(e)
1	25.4	Additional finances be contributed to public education and promoting the new wilderness areas, their values and appropriate activities for these areas	There will be an action on promoting the values and appropriate activities in wilderness to the final management plan	1(d)
4	25.4	Support formally protecting wilderness areas within the parks by gazetting them under the CALM Act	Noted	2(a)
1	25.4	I note that wilderness areas are exceptionally rare in Western Australia. As such, these areas are irreplaceable and of great value. Given that relatively little is known of the ecosystems of the South West before European settlement, wilderness areas are an essential resource for the improved understanding of local ecosystems. I would encourage the inclusion of wilderness areas in the DMP and consider those areas too valuable to be treated as anything other than wilderness	Noted	2(a)
1	25.4	I am very pleased to note that there is a recognition of the importance of retaining the few areas of real wilderness in WA	Noted	2(a)
1	25.4	The development of wilderness areas is strongly encouraged	Noted	2(a)
2	25.4	The proposal to evaluate wilderness and consider designation of areas within the parks is very welcome	Noted	2(a)
1	25.4	I note that there have been four areas designated under the DMP as 'candidate wilderness areas'. I certainly support the recognition of wilderness areas, and would fully endorse any efforts to gazette these areas as wilderness	Noted	2(a)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
3+913	25.4	Strongly support the creation of four new wilderness areas	Noted	2(a)
1	25.4	We suggest that more easterly sections of the national parks, such as 'Chesapeake and Pingerup' appear to better reflect the possible wilderness classification than 'Yeagerup', 'Malimup and Callcup' and 'Chudalup'	Noted	2(a), 2(d)
1	25.4	A wilderness area would be more suited to more remote, less visited areas such as the Chudalup and Chesapeake Blocks	Noted	2(a), 2(d)
1	25.4	Opposed to the creation of wilderness areas as there is no current support	There is considerable support, see above	2(e), 2(g)
1	25.4	It if ain't broke don't fix it. I say no to creating wilderness	Noted	2(e)
1	25.4	We see no earthly reason for creating huge wilderness areas in the southern forests. They serve no ecological purpose, are not wanted by the community, are not needed by people seeking solitude, complicate management, make fire protection more difficult and represent a death trap for firefighters and bushwalkers. The Conservation Commission is responding to the demands of a particular tiny pressure group (the Wilderness Society) whose members do not have any responsibility for protection of local communities, bushfire management or firefighter safety and are not accountable for the results of the management system they propose. Why should their demands over-ride the views of the entire local community and of the people who have to do the work in the bush? It is significant that in the RFA process the concept of wilderness zones was rejected in forest areas in the South West because of the fire risk to firefighters and recreationists. What has changed so that the Conservation Commission is now recommending the establishment of wilderness areas?	The Government has made a commitment to create the Walpole Wilderness Area, which has lead to the development of a policy on the identification and management of wilderness areas. This policy was available for public comment. The policy states that as part of the development and review of all management plans, consideration must be given to the identification of candidate wilderness and surrounding areas	2(e)
1	25.4	The four candidate areas have clearly been chosen largely because of their lack of formed access. Fair enough. However, implicit in your treatment of wilderness areas appears to be the general lack of fuel reduction burning. The fuel in unburnt areas will inexorably build up to dangerous levels until eventually a wildfire occurs in them under severe conditions. Appalling damage is then done and performance measure 22.3, 22.4 and proposed performance measure 22.5 are not met. In addition the safety of visitors and fire fighters will be severely threatened. For that reason the Chudalup area should be discarded as a wilderness area or at least much diminished in size as it is a threat to the settlement at Windy Harbour. As a principle, the wilderness areas should only be demarcated after the fire management plan for the parks, including fuel reduction proposals, have been completed	Prescribed burning will still be undertaken as proposed in the Master Burn Plan. The candidate wilderness areas were chosen because of their lack of current access tracks and undisturbed nature. Protection of community assets, biodiversity and the safety of fire fighters are key considerations in the biannual review of the Master Burn Plan	2(d), 2(e), 2(g)
1	25.4	Management to continue just as national parks now. It is unnecessary to lock our areas away to the extent of wilderness	As above	2(e)
1	25.4	Unnecessary to make wilderness areas	As above	2(e)
1	25.4	Leave as national parks but with access by all Australians	As above	2(e)
1	25.4	The controls already available to management provide more than adequate protection. The declaration of wilderness areas will make management more difficult. Wilderness areas are only for the extreme greens who have a load of bullshit and have no proper regard for the long term proper conservation	As above	2(e)
1	25.4	Before any consideration to look at wilderness areas - feral animals and unwanted plants should be removed. E.g. marram grass, Victorian tea tree	As above	2(e)
1	25.4	Wilderness area will: reduce future planning flexibility because it makes a commitment to permanent exclusion of other uses on the assumption that 'today's decision is the best decision'. Changes that have been made to zoning and planning policy since the inception of the park clearly demonstrate that future generations do need flexibility and permanent commitment of this nature must be cautiously implemented. It is irresponsible to commit future generations unnecessarily on the basis of current values and philosophies	Gazetted wilderness protects the wilderness asset for future generations to make decisions regarding its future. It is not necessarily a permanent exclusion however the Department's wilderness policy states that any proposal to amend or cancel an established wilderness area has to be tabled before both Houses of Parliament	2(g)
1	25.4	We oppose any wilderness areas because consideration must be given to future planning as what may currently exist now, may not for future generations, based on current values and beliefs	This comment is unclear, presumed the intent is the same as comment by CG11, see above	2(g)
1	25.4	We oppose the declaration of any wilderness areas within the D'Entrecasteaux National Park	Noted	2(e)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	25.4	In our view there is ample scope to implement management practices that provide the same degree of protection and opportunity for 'natural' development without the formal declaration of a wilderness area. The opportunity to implement varying degrees of access control already exists	Gazetting an area as wilderness gives it statutory protection against further development. Other natural areas will be maintained through the visitor management settings	2(e)
1	25.4	We oppose any wilderness areas being declared by CALM within the D'Entrecasteaux National Park because we believe the proposed wilderness areas described do not meet the criteria of a wilderness area as defined by the IUCN as areas designated are described as multiple use areas, having previously been used for timber industry, sheep and cattle grazing etc. A true wilderness area is described as an area that has very minimal or has had no human intervention or remoteness from settlement	The candidate wilderness areas are not multiple use areas. A national park is not a multiple use classification There have been past disturbances, however the wilderness areas do not have to be pristine, the Department's wilderness policy provides for rehabilitation of past disturbances to establish a wilderness area The wilderness areas do have minimal human intervention and are remote from settlement	2(d), 2(g)
1	24	As stated on page 74 my family has had a connection with this land for well over 100 years. The changes to that landscape are significant and certainly bear no resemblance to what is stated as being seen in 1814. No way can this be classified as wilderness	As above	2(d), 2(g)
1	25.4	Map 9The areas set aside for 'wilderness' is not necessary. Most of the areas are not pristine as they were once cattle leases (Thomson, Brockman, Dunnett) and serviced by horsemen	As above	2(d), 2(g)
1	25.4	We believe that the integrity of the concept of wilderness should not be compromised by the inclusion of areas that do not meet nationally agreed criteria	As above	2(d), 2(g)
1	25.4	How can CALM propose wilderness areas (only accessible by foot) if they include tracks into popular coastal areas and the Windy Harbour Road abuts the eastern side of the proposed Chudalup Wilderness area?	If you compare Map 9 with Map 10, then you will see that the candidate wilderness areas do not include any public tracks. The candidate Chudalup wilderness area does not abut Windy Harbour Road, the road has been buffered sufficiently. Note that a wilderness area for Chudalup will not be pursued.	2(g)
1	25.4	Wilderness areas as proposed do not qualify according to international criteria. Fancy having a wilderness alongside the Windy Road?	As above	2(g)
1	26	We do not support four new wilderness areas if this means that four wheel drive access to such areas a Yeagerup/Warren Beaches, Fish Creek/Gardner river areas result in the closure of tracks for vehicle access. Recreational opportunities will be severely restricted without any replacement opportunities being offered. We are of the opinion that access through environmentally sensitive areas could be managed in ways other than in 'complete restriction'	As above, wilderness areas should not impact on current access as there is no current public access through these candidate wilderness areas	2(g)
1	25.4	The proposal to dedicate four wilderness areas within the parks is difficult to understand. The draft outlines the criteria for wilderness areas as requiring a wilderness quality rating of at least 12 and an area of 8 000 Ha. According to the Comprehensive Regional Assessment (RFA 1998), no areas in the south west satisfy these criteria, a fact not mentioned in the draft plan	As above	2(d), 2(g)
1	25.4	It appears that the proposed wilderness park is inappropriate due to the fact that the areas are easily accessible and are not remote from human settlement. It is very obvious that this management plan was drawn up to convey all the negative aspects that recreational use has on the National Park	As above, the whole park is not proposed to be a wilderness area	2(g)
1	25.4	I do not endorse the renaming of areas to Wilderness or National Parks, as this will only benefit CALM, leaving the door open for them to do as they please. In order to keep the conservationists happy	As above, the planning area is already national park	2(g)
1	25.4	Chudalup Block is severely fire damaged and I believe does not meet IUCN criteria. However, agree that wilderness status be allocated provided careful rehabilitation is undertaken	Noted	2(a), 2(d)
8	25.4	Do not support the creation of these wilderness areas - if the result is to close off the current access tracks through the nominated "blocks" and access to beach driving especially in the areas of Warren Beach, Yeagerup Beach, Malimup Beach, Gardner River Mouth, and Fish Creek areas	As above, there is no public vehicle access within the candidate areas and beach access will not be affected	2(g)
1	25.4	The creation of these wilderness areas will cause restrictions to future access to our coasts and other recreational areas for little or no benefit. The closure of many roads that will result will seriously hamper the disabled and infirm. The current plan has worked well for the last eighteen years	As above	2(g)
1	25.4	I request that all proposed wilderness areas be dropped and remain as national parks only	Noted	2(e)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	25.4	I do not support wilderness areas in the D'Entrecasteaux National Park because I do not believe these areas meet any of the criteria required. The Yeagarup and Malimup areas have private property inside the candidate wilderness areas. The Chudalup area has Windy Harbour road the entire length of the western boundary	There is no private property within the candidate wilderness areas, the private property at Yeagarup has been purchased and the private property at Malimup is nearby but not within. Also Windy Harbour Road is buffered	2(e), 2(g)
1	25.4	I do not support wilderness areas in the D'Entrecasteaux National Park because all internal roads to these candidate wilderness areas have been closed so there is very little human interference in these areas already with no likelihood of that increasing. Not creating wilderness areas will also make management by CALM much easier in regard to fire control	Creating wilderness is an important objective for the management plan and can be implemented without compromising effective fire management	2(e)
	26	Access		
8	26	Access through environmentally sensitive areas could be managed in ways other than in "no access"	The controls that the Department seeks to apply are those directed at protecting the natural values of the parks and protecting the visitors' safety and enjoyment of those values	2(d), 2(e), 2(g)
1	26	With more and more people pursuing outdoor activities, we urge CALM to re-consider its limiting access policy and to in fact pursue resources to encourage greater access to opportunities in the parks	There is no limiting access policy. The Department balances the demands for recreation with the demands for conservation by directing sustainable recreation activities to environmentally sustainable areas	2(e)
1	26	This document gives one the impression that CALM are reneging on their responsibilities as carers of the Shannon and D'Entrecasteaux National Parks and by the imminent closing off of tracks to coastal areas and proposing wilderness areas will require less management and responsibility on their part. The management issues for fire, feral animals and weeds should be considered a greater importance than denying people the enjoyment of the pristine coastal areas within the parks	As above, the plan does not limit coastal access and proposed wilderness areas already do not have access	2(e)
1	26	By making decent roads into places will take pressure off the environment and everyone will have access	As above	2(d), 2(e), 2(g)
1	26	Obtain sufficient funds to keep existing tracks in good condition during times of heavy traffic and inclement weather, thus avoiding drivers making new, alternative tracks to either side	The Department obtains funds for track maintenance and upgrade regularly, also four-wheel drives clubs and other community groups also sometimes assist with labour and materials. However, seasonal closure is still sometimes the best management option	2(d), 2(e)
1	26	We are not adverse to conserving our beautiful country and looking after it but the people must not be locked out of their own country and education will make people more compliant than locking them out or charging them for what is rightfully the peoples'	The plan outlines strategies for managing access, not denying access. Fees are set by legislation and Government policy	2(c), 2(e)
1	26	I object to the closure of any access roads to our coast restricting recreational fishing. In support of the campaign "Life Be In It" in which our government is a co-supporter and co-sponsor, I object to the closure of boating and fishing activities on the grounds of denial of the right to enjoy a healthy outdoor lifestyle of which our government is endeavouring to promote	The draft does not propose any new restrictions to the coast for recreational fishing	2(g)
1	26	Roads are essential in all forests but especially so in the thick southern forests and impenetrable heathlands of the south coast. Their maintenance must have high priority. In our experience an un-maintained road in southern forests will become impassable within 2 years due to falling logs and limbs, germination of scrub, growth in from the sides and creek crossings being washed out	Departmental managed tracks that are open to the public are maintained	2(a)
1	26	Without roads, fire cannot be fought effectively and safely. In failing to maintain roads, the CC and CALM are condemning the bush and firefighters to be cooked or alternatively they are implying that new roads must be built every time there is a fire. We recommend that all existing roads in both parks are retained and properly maintained as access and egress for firefighters. This means that funds must be provided to ensure a maintenance cycle of at least two years	Roads that are required for fire management purposes but not for public access are retained and maintained as management access tracks, except in gazetted wilderness areas (i.e. in theory as there are no gazetted wilderness areas yet in the State). In wilderness fire management will be according to Policy Statement 62 and relevant area management plans. Prescribed burning can still be carried out in wilderness except the fire management unit will be larger. In the event of a wildfire, mechanised access for wildfire suppression is allowable with approval from the Department's Director General	2(d), 2(e), 2(f), 2(h)
1	26	All tracks should be left open and cleared on a regular basis for fire protection purposes - no tracks = fire will destroy the park	As above	2(d), 2(e), 2(f), 2(h)
2	26	Para 1: re-word '... <u>protection</u> of particular recreational <u>opportunity</u> and/or...'	The wording of preservation of the experience will remain	2(d)
1	26	It is important that legal and practical access is retained to key recreational areas and that this is reflected in the final management plan. In some instances, there may be a need for appropriate legal access to be introduced for the tracks outlined in Appendix 11	The access strategy in the final management plan is sufficient	2(h)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	26	Various access tracks may not have appropriate 'legal' status and accordingly, there is a risk that they could be closed off to the wider community. We encourage CALM to investigate this matter and advise the Council of the outcome. We suggest that an agreed approach of placing suitable tracks into gazetted road reserves or utilising other legal mechanisms needs to be adopted by CALM	As above	2(h)
1	26.1	There may be opportunities for CALM to investigate the use of Public Access Routes (PAR), provided through the Land Administration Act. In various cases, a PAR may be preferable to formalise access that a public road. It is suggested that the advantages of a PAR over a public road, include: there is no requirement for CALM to maintain a PAR; liabilities are considerably limited to the State Government with a PAR given the public access these routes at their own risk; it assists to retain the remote character of various areas, as access along a PAR is typically expected only by 4WD	Noted	2(h)
	26.1	Types of Access		
8	26.1	National Parks should be available for all citizens to enjoy, not only those with the ability to walk long distances	It is appropriate for some areas to be easily available, and some areas to be more remote and harder to access, refer to the section on visitor management settings. There are a number of sites and experiences available within the parks for those either with a 2wd only, those who can not walk far and/or those with disabilities	2(e), 2(f)
1	26.1	If tracks are closed off this would result in a large number of people being unable to participate in outdoor recreation activities, particularly those such as ourselves who are now less able to walk long distances than we were when we were younger. Those who manage national parks should not give the appearance of discrimination against those who through are more reliant on their 4WD vehicles than the younger generation. Remember that old age catches up with us all, including those who currently find themselves in a position to make rules that seek to govern the way the rest of us can spend our lives	As above	2(e), 2(f)
8	26.1	Overall the consistent opinion from all existing users of the parks is that the proposals in the DMP is likely to severely restrict access to everyone except walkers - we do not consider this to be equitable - in fact it is quite discriminatory against those through mobility problems (medical, aged or with young families) who cannot walk far - they will never be able to access the Southern Ocean through the D'Entrecasteaux NP	As above, however the draft proposes very little change to access within the parks	2(e), 2(f)
1	26.1	No 4WD motorbikes and motorbikes	All vehicles registered under the Road Traffic Act 1974 such as motorbikes are permitted to use the tracks shown on Map 10	2(e)
2	26.1	p83, para 1: Add extra sentence: 'Extensive opportunities for self-planned bushwalking routes exist in the parks via existing tracks, extensive tracts of open coastal heathland and beaches'	Text will be added to indicate opportunities for wilderness walking	1(e)
1	26.1	Map 10. Heading should state that this map shows the proposed access allowed during the life of the plan, a bit confusing as to whether this access is now and the proposed changes in the plan will change this map?	The text makes it clear	2(d)
1	26.1	Map 10. Management access only roads and tracks should be on a different map	Will not be shown on Map 10, will be available internally only	1(e)
1	26.1	Map 10. Black Point Rd 4WD section is seasonally closed	Map 10 will indicate seasonal closures	1(e)
1	26.1	Map 10. The 4WD section of Jangardup Rd is restricted or management access only	Also known as 270 degree Track, will be taken off Map 10 as it will be management access track only	1(e)
1	26.1	Map 10. Oilwell Tk (restricted, permit only)	Map 10 will be amended to show restricted and seasonal access	1(e)
1	26.1	Map10. Un-named tracks near Lewis Rd? What are they?	These will be removed from map as they are management access tracks off Ryder Road	1(e)
1	26.1	Map 10. Salmon Beach Rd and D'Ent Drive should show as sealed for the greater part	Noted	1(e)
1	26.1	Map 11. (inset 2) show walk trail from the lighthouse to windy harbour	Map 11 amended	1(e)
1	26.1	Map 10. Power boats on the Gardner river?	There is very little powercraft use on the river currently and there is not much that is navigable. The map will be amended	1(e)
1	26.1	Map 10. Hester Track??	Also known as Dart Club Hut Track	2(b)
1	26.1	Map 10. Spring Break Rd as 2WD? Its 4WD, possibly management access only	It is 4WD and seasonal closure	1(e)
1	26.1	Map 10. Access to the east of Fishcreek? To be restricted or seasonal?	Yes, as per Appendix 11 all tracks east of West Cliff Point and west of Broke Inlet, rationalise to one 4WD track, seasonal or permit entry. Map will be amended	1(e)
	26.2	Access Demand		

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	26.2	In the opening paragraphs of this section there should be made mention of trail bike riding under the category of an 'activity in its own right'	Trail bike riding is generally seen as inappropriate activity as these bikes often leave the track. The plan adequately reflects the use of licensed motorbikes and mountain bikes	2(d)
1	26.2	The increase in four-wheel drive ownership and the reputation of these national parks as four-wheel drive destinations combine to demonstrate a need for more detailed four-wheel driving management in the national parks than exists within the draft. The potential for increasing numbers of four-wheel drive vehicles should be addressed through improvements in visibility, passing lanes, sign posting, mapping and other safety aspects as well as parking in areas that previously experienced low visitation due to access difficulties	Noted, however increasing visitation to sites is not always recommended. Therefore, parking number limits at day use and camping sites will be classified by a combination of the visitor management settings as well as the camping/day use classification system. The other details in terms of the access route -- passing lanes, sign posts etc are a level of detail below the management plan	2(d), 2(h)
1	26.2	In relation to statistics, comparisons of registrations between four wheel drives and trail bikes can be misleading, as it is well documented that the vast majority of four wheel drives sold never leave bitumen roads. It is safe to assume that less than 20% of four wheel drives would ever venture into the four wheel drive tracks of Shannan National Park? Which reduces the impact of the 180,103 new four wheel drives sold in Australia in 2002 down to around 36,000 that are actually used off road. By contrast, there is no reason to buy an off-road motorcycle except to go off road riding. In 2004 there were 55,230 off road motorcycles sold in Australia. Despite their comparative lack of visibility, there is a very significant number of Western Australians looking for the best places to ride their trail bikes	Noted, however there are and will be no designated trail bike tracks. Licensed motorbikes are adequately addressed in the draft plan	2(d)
1	26.2	There is significant anecdotal evidence that a high proportion of trail bike riders are in the 35 years plus age bracket. The implications of this trend are that today's trail bike rider is statistically more likely to be more mature, environmentally aware and seeking an experience that combines the adrenalin of riding with the beauty of the natural surroundings	As above, also would question whether 35 plus users are any more or any less environmentally aware than younger people	2(g)
1	26.2	It should also be noted that if the final Augusta Walpole Coastal Strategy (AWCS) allows further subdivision of coastal land in the vicinity of White Point that there would be a likely increase in demand for access to the D'Entrecasteaux National Park from the west	Noted, Woodarburrup Road provides four-wheel drive access to the western end of the park from White Point	2(b)
1	26.2	The Draft AWCS states: A major issue of community concern expressed with the establishment of both the D'Entrecasteaux and Shannan National Parks in the 1980s was that vehicle access through the Parks to the coast would be progressively reduced over time. This concern still exists within the community today, particularly as access to a number of 4WD tracks within the Park has been restricted and/or closed off over the past two decades	Most areas of the parks can still be accessed. Some areas require seasonal closure, however there is still some 20 access points to the coast and over 60km of beach that can be driven along	2(e)
1	26.2	Visitors will follow locals wherever they go and stay on local tracks	Management experience in the parks is that is not always the case	2(b)
1	26.2	Areas should be designated as they are for either 2WD or 4WD vehicles. Once I had to walk for 10km carrying all fishing gear and eskies. Then I had to turn around and walk back carrying the same but including my catch. I hardly see why all people should be able to access the coast taking away the aesthetics, the reason why the majority of people frequent these areas in the first place. I have made sacrifices in order to be able to afford the cost of going to the coast. Why then should others be able to walk straight in and do it without making the same type of sacrifices that I have had to do. Should you not be able to afford the cost of running a 4WD there are 4WD tours that are accessible to all. I, like the majority of people, would love to be able to operate and own my own plane, however because this is out of my reach all I can do is either hire one or become friends with a likeminded person and utilise theirs or I have to join a scenic tour group via the local tourist bureau	The principles of some areas requiring more effort to access to preserve the landscape and experience is reflected in the draft management plan. Also the point on commercial tour operators providing services for those who do not have 4WDs etc	2(a)
2	26.2	This section makes some important points however it does not actually state that there is already extensive and obvious degradation/disturbance of natural areas (such as badly eroded vehicle tracks, damaged vegetation, eroded coastal foot tracks, not to mention spreading weeds and dieback). Perhaps it should	Section 26 will be reorganised and rewritten to make this clearer	1(e)
2	26.2	p83, 2nd last para: re-word to say: 'Uncontrolled existing demand has already compromised some of the qualities of remoteness'	Something to this effect will be added	1(e)
1	26.2	There is a need to balance the requirements for some areas to have vehicular access (in many cases only by 4WD) and other areas to have restricted access to assist in the sustainable use and management of key conservation features	Noted	2(b)
1	26.2	We believe increased accessibility and overuse is an issue arising from the management of the national parks	Noted	2(b)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	26.2	Keep existing tracks open to the coast but close superfluous ones	That is the proposal	2(a)
2	26.2	Even though it is obviously needed, it would appear difficult to devise a system that discourages groups of any type exceeding a particular number of people and/or vehicles, without introducing a formal access permit system	Education, management presence, physical barriers or a permit system will be used if number limits are required	2(b)
1	26.2	Providing secure legal and practical vehicular access to various points along the coast is important because: it achieves greater community ownership and respect for the national park (as opposed to 'locking' people out)	There is various access to the coast and the management plan provides security for the community that this access will remain	2(g)
1	26.2	Providing secure legal and practical vehicular access to various points along the coast is important because: it maintains the historical connection that has occurred for more than a century	As above	2(g)
1	26.2	Providing secure legal and practical vehicular access to various points along the coast is important because: it provides access to recreational opportunities	As above, this is sufficient to provide access to a variety of recreational opportunities within the parks	2(e)
8	26.2	CALM's own reports show the increase in demand for access by 4WD vehicles yet the Dept, is advocating closure. We encourage CALM to spread the potential impact of overuse by opening up additional areas of the Parks	Opening up additional areas does not spread potential impact, it increases visitation. Therefore, an increase in demand does not always mean increasing access is the solution The draft plan proposes 30 closures of tracks (or parts of tracks) not already effectively closed, 28 of these are from the 1987 plan with only two new closures - Tragedy Track and Deeside Coast Road south of Chesapeake Road. There will be 8 seasonal or restricted tracks. Also to note is that there are 18 tracks proposed in the 1987 plan to be closed that will now be open, or at least seasonal/restricted. So the new plan actually provides for more access overall than the previous plan	2(d), 2(e), 2(g)
8	26.2	To reduce areas in which one can visit will only put increased pressure on those parts that can be accessed	As above, areas are not being reduced from the 1987 plan	2(d), 2(e), 2(g)
1	26.2	Whilst we appreciate the need to prevent overuse of 4WD tracks in some of the parks, we strongly believe that it is illogical to close selected tracks as this will inevitably increase traffic on those left open. It would be much better in our view to open as many additional tracks as possible and to spread the traffic over a greater number of tracks, thereby reducing the wear and tear on each individual track	As above, access will not be reduced and increasing access only increases visitation -- it does not spread visitation	2(d), 2(e), 2(g)
1	26.4	In addition to urging CALM to not close off access to existing points of interest or activity, we encourage CALM to spread the potential impact of overuse by opening up additional areas of the Parks	As above	2(d), 2(e), 2(g)
8	26.2	I appreciate that this is a direct side effect of increased usage patterns. But closing off areas so affected will not reduce the issue as this will then promote illegal use of areas. Instead I support CALM in its efforts to establish new areas and to attract a higher level of resources to cater for increased usage	As above	2(d), 2(e), 2(g)
8	26.2	Demand will increase even further in future years. The parks cannot be "managed" by denying access to people (and their associated vehicles whether two or four wheel drive). Future plans should encourage use of the parks - not close them off to only walking access	Management involves many strategies to deal with increased demand and it is entirely appropriate in national parks to keep some areas free of vehicles such as in wilderness areas whilst providing many other opportunities for vehicle access in the parks	2(d), 2(e), 2(g)
1	26.2	Visitors are spread over 135kms of coastline so it is important to have as many access points open to the beach as possible	There are 17 access points along the coast within the parks	2(e)
1	26.2	Beach access should be available at all times to high water mark and first dune	There are sometimes safety or environmental reasons why this is not possible	2(e)
1	26.2	More beach access roads	As above, there are numerous access points to the coast	2(e)
1	26.2	Visitors to have access to beaches and all places and items of interest	As above, there are numerous access points to the coast and places of interest	2(e)
1	26.2	Tracks should be upgraded in critical areas to avoid people making alternative tracks	Actions to avoid track duplication will be implemented as appropriate and in line with the management plan	2(a), 2(d)
1	26.2	I have thoroughly scrutinized the report and agree with most of the content however to exclude local people who have enjoyed the area from part of the park would be blatantly discriminatory	It is not discriminatory if access has to be removed to protect the values of the parks and/or safety of visitors. In most cases access is not changing	2(d), 2(e), 2(g)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	26.2	There is a unique spot off the Donnelly River Boat Landing road known as Goblin Swamp, I have visited this attraction many times with visitors who have always been very impressed. As far as I know it is the only place in the South west that is so unique. Some two years ago when I visited this swamp I found metal bars had been placed across the entrance from Boat Landing Road preventing vehicle access. Consequently you now have to walk making it hard for elderly people. A bit further down the same access track is a beautiful camping spot on the banks of the Carey Brook. This is also blocked to vehicle traffic. As a considerable amount of money was spent developing these two sites, I cannot understand why vehicles are now not permitted. I have not seen any environmental damage and it would be easy to make a car park where some pine trees were recently removed. It appears that those in authority do not want tourists to visit this area as there are no signs indicating its existence	Access for visitors to appreciate these unique areas has been provided and significantly improved with a board walk and viewing platform at Goblin Swamp and some remedial work at the Carey Brook camp site. It has been necessary to limit the level of visitation to prevent degradation of the sites and to ensure that future generations can enjoy the unique qualities of these special places. Additional campsites have been provided further along Carey Brook and near Lake Yeagarup in more sustainable locations to cater for vehicle based camping	2(a), 2(h)
1	26.2	Controlled use of Yeagarup dunes should be allowed	The dunes can be crossed using the marked track. Uncontrolled use of the dunes is not permitted	2(a), 2(g)
1	26.2	Providing secure legal and practical vehicular access to various points along the coast is important because: it facilitates access for emergencies	There is various access to the coast	2(g)
1	26.2	Other matters that require further consideration include the issue of safety and access for emergency vehicles which is improved through two-wheel drive access as well as allowing faster egress from the parks in the event of an emergency or injury. It should be acknowledged that the increasing visitation of these parks may lead to more emergency events such as king wave incidents or other coastally influenced processes, bogged four wheel drives, four-wheel drive accidents particularly along historical tracks which were not designed for substantial four wheel drive use, vehicle break downs, increased incidents resulting from the 'grey nomad' travellers accessing the parks etc	No further two-wheel drive access will be provided, when people venture off two-wheel drive access tracks they should be aware of the corresponding issues of remoteness. Information on safely accessing coastal areas are provided in Departmental brochures e.g. <i>Going to the Coast</i>	2(d)
1	26.2	Salmon Bay beach is the best salmon fishing area in the Windy Harbour area, access should not be denied to our elderly and disabled citizens. To access Windy Harbour salmon fishing area four wheel drive vehicle is required as elderly and disabled people are unable to walk down or up the hill to the current car park	Not every beach in the planning area will have developed access right to the water. Some beaches will require more effort and be less accessible, this is in keeping with the vision and objectives to provide a range of access rather than to provide the same access throughout the parks and to overall maintain the remote nature of the parks	2(e)
1	26.2	Salmon Beach - vehicle access to include access for seniors	As above	2(e)
1	26.2	In the case of an emergency it may be necessary to take a vehicle on to Salmon Beach or launch a boat from the beach	Agreed, as per the 1987 management plan four-wheel vehicle emergency access is maintained as far as possible according to natural beach processes however, sometimes it is easier to launch a boat from Windy Harbour	2(d)
1	26.2	Salmon Beach Gate must be opened and rescue vehicles allowed on beach in an emergency	As above, and keys to the gate have been supplied to the Windy Harbour Sea Rescue Group	2(d)
1	26	Salmon Beach: 4WD emergency vehicle access to Salmon Beach near Windy Harbour should be opened and maintained. Many incidents involving swimmers in difficulty and more recently a person suffering a broken ankle did not allow access for emergency services. The Windy Harbour Sea Rescue Group is also equipped to launch a recovery vessel from Salmon Beach, in circumstances where time is essential	As above	2(d)
1	26.2	Given that CALM actively promotes and encourages people to use Salmon Beach for recreational purposes (including beach fishing) and has spent considerable money upgrading facilities, it is suggested that CALM should consider whether access for emergency situations is appropriate in this locality. This includes access by a vehicle/boat and the ability to launch a 'Zodiac' or similar from the beach (particularly if weather conditions are unsuitable to launch a boat from Windy Harbour)	As above	2(d)
1	26.2	Emergency 4WD access should be created and maintained to Salmon Beach for beach rescue, and for sea rescue when weather conditions are unsuitable from boat launching from Windy Harbour	As above	2(d)
1	26.2	Windy Harbour beach to Gardiner river remain a recreation beach from high water mark for holiday makers and tourists. The Windy Harbour settlement area is restricted, it is the only area with access to beach for recreational boat fishing, swimming and other associated beachside activities	Noted	2(b)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	26.2	With the proposed closure of Tragedy Track to the Gardiner River mouth camping area, an alternative route to the Gardiner river road should be made off the main road (Windy Harbour road) to allow excessive traffic to be diverted around the Windy Harbour settlement rather than through the settlement which already has problems with narrow and unsealed road and increased traffic	The Department will negotiate with Shire of Manjimup to obtain access to Gardner Track	2(d)
1	26	Gardner River Camping Site: Access to the camping site at the mouth of the Gardner River east of Windy Harbour is currently via Tragedy Track. In the draft document, CALM has recommended its closure (p206). If this is to occur, all vehicular movement will be required to pass through the Windy Harbour settlement, therefore posing responsibility for roads, rubbish removal, water, toilet and rest area facilities onto the Shire of Manjimup. If Tragedy Track is to be permanently closed, it is recommended that CALM consider constructing an access road from the beach area to Windy Harbour Road near the eastern boundary of Reserve No. 13304	There is no expectation or intention that DEC will transfer any management responsibilities to the Shire of Manjimup. The Department will liaise with the Shire of Manjimup to obtain suitable access to Gardner Track	2(d)
1	26	Gardner River Mouth - bypass road should be formed so that visitors do not go through Windy Harbour settlement	As above	2(d)
	26.3	Two-wheel Drive Vehicle Access		
1	26.3	I totally disagree with more access via 2WD vehicles this is going backwards	Noted	2(a)
1	26.3	Creating 2WD access will only increase rubbish issues and people issues	Noted	2(a)
1	26.3	Why has 2WD access even considered an issue if you're trying to reduce impact on the area?	No new two-wheel drive access is proposed	2(a)
1	26.3	We agree with the proposals for two-wheel drive access included in the draft plan. To maintain the feeling of remoteness that is so much a part of the character of the D'Entrecasteaux Park we are opposed to the development of further two-wheel drive access and associated facilities at this stage	Noted	2(a)
2	26.3	Very Good! 2WD access to the coast in the SW is already well catered for. Most of the major scenic vantage points already have good roads to them	Agreed	2(a)
8	26.3	Providing additional 2WD access within the parks is not proposed. This totally ignores the social aspect of the "triple bottom line" It is an exclusionist policy - the proposals from the 1987 management plan should remain as an aim	Preserving the remote nature of the parks is part of the vision and the objectives of the revised plan. There is two-wheel drive vehicle access to beaches on the west coast, and in the Albany area. Within the parks there is two-wheel drive vehicle access to features such as the Great Forest Trees Drive, Donnelly River, Windy Harbour, Point D'Entrecasteaux, Mt Chudalup, Broke Inlet, Mandalay Beach, and Salmon Beach. There are also multiple four-wheel drive tour companies that operate within the parks	2(d), 2(e)
1	26.3	Potential status quo on access by two wheel drive vehicles into the Park areas - The 1987 Management Plan identified several roads/tracks which were to be developed as suitable for two wheel drive vehicles, the 2005 DMP states that no further road development to enable two wheel drive vehicles will be undertaken. The DMP states that the reasons for visiting the parks relate to sightseeing and/or driving for pleasure (page 103). The report also indicates that there is increasing pressure to make parts of the parks more accessible for tourism as well as individuals driving for pleasure (page 103) yet this section also states that "access is already available to the diversity of features in the park". By concentrating increased visitor numbers into a smaller number of areas, the sustainability of those areas will be diminished much easier than if a greater variety of experiences in different locations could be accessed?	People also visit the parks for their sense of isolation and natural values. As above the vision and objectives is to preserve the remote nature of the parks The Department seeks to provide a range of opportunities across the region rather than duplicate the same experience in every recreation site, in every park. This is why different visitor management settings will be used throughout the parks. As you state, a variety of experiences is to be provided including: four wheel drive access, two wheel drive access, walking access and boat access, however two-wheel drive access will be limited to maintain the remote nature of the parks Directing different visitor types to different locations allows better management as facilities can be tailored to their expectations. Two-wheel drive vehicle access usually corresponds with a more developed setting with a high level of facilities and service available Creating more access does not alleviate pressure on the parks, it increases overall visitation. Concentrating development in a smaller number of areas allows other areas to be left more natural. Measures can be introduced to limit numbers or manage impacts in the areas where higher levels of development, use and/or access are permitted	2(d), 2(e)
1	26.3	P84 - part of Summertime Tk is mentioned as 2wd?? Map 10. Summertime Track shows as part 2WD, this should be 4WD (seasonal closure)	The map will be amended to show 4wd access from Windy Harbour Road and text will be amended	1(e)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	26.3	Vehicular access to locations such as Point D'Entrecasteaux are primarily on roads managed by the Shire of Manjimup such as Wheatley Coast Rd and Windy Harbour Rd. A significant proportion of traffic on Wheatley Coast Rd and Windy Harbour Rd is of a regional nature which is accessing the National Park and is non-local in origin. Unfortunately, at this stage, the Council does not receive external funding to keep Wheatley Coast Rd and Windy Harbour Rd to an appropriate standard on an on-going basis without having considerable budgetary implications elsewhere	The Shire and the local community receive economic benefits from increased tourism in the region from the attractions of the national parks. The issue of regional road funding is beyond the scope of this management plan	2(c)
1	26.3	It should be noted that <i>Roads 2020</i> is somewhat outdated and is due for a review. This regional series of documents has only provided limited road planning guidance in other areas of the state so should be referenced as potential options only	Noted	1(e)
	26.4	Four-wheel Drive Vehicle Access		
1	26.4	The use of four wheel drive vehicles in the Parks has been a matter of ongoing debate for many years, and I note with appreciation that four wheel drive vehicles have been banned from some areas of the Parks, as part of an overall reduction in access to coastal reserves around Western Australia	Noted	2(a)
1	26.4	I strongly support a ban on four wheel drive vehicles in the Parks, on the grounds that these vehicles are difficult to control. Even one irresponsibly operated vehicle can cause a significant amount of damage in a few hours. The conservation of biodiversity (including migratory birds and rare flora) is more significant than the passing entertainment of a wild drive through a national park	Noted, and this is why some access is being closed or restricted to certain areas, however it is not policy to completely restrict vehicle access within national parks. 4wd access will still be provided as indicated, managed to minimise impacts by realignment, rationalisation, upgrading, seasonal closures and/or permit access as required. However there are some areas which will be retained as vehicle free as well as some areas that will be gazetted as wilderness	2(e), 2(f)
1	26.4	4WD should be restricted	As above	2(e), 2(f)
1	26.4	Four wheel drive vehicles have already caused great damage to the fragile soil profiles in the park and the scars remain for years (e.g. track to small permanent lake at E116o03'50" S34o48'25")	Noted, the Department has attempted to close these tracks in the past and it is an ongoing management issue	2(a), 2(b)
1	26.4	Protect the entire area the Doggerup/Blackwater system from unauthorised or excessive 4WD traffic	No 4WD access is permitted outside that shown on Map 10. The majority of the Doggerup system will be protected by the proposed wilderness in this area	2(a)
1	26.4	Other matters that should be addressed on an on-going basis through the management plan is the threat from four-wheel driving activity on sensitive environments which may impact upon habitat, exacerbate erosion, spread diseases such as <i>Phytophthora</i> and reduce visitor enjoyment	These matters are addressed as some tracks are going to be seasonal, realigned, upgraded or permit access	2(a)
2	26.4	It is clearly time to introduce a permit system for 4WD access and use in the D'Entrecasteaux Park. The sooner we all get used to living under such a system the sooner the widespread and increasing degradation of these natural areas can be halted and reversed	This would be very hard to enforce for the whole park and would not be the best use of resources. However, some tracks will be on a permit only basis	2(d)
1	26.4	Public pressure which has been voiced to allow activities inconsistent with the objectives of a national reserve, for example, unrestricted 4WD access particularly to coastal areas, must be resisted. In the past, with lower visitation rates to these areas such activities may have been acceptable, however, now such activities risk degrading the natural values of the National Park	No off road vehicle access is permitted	2(a)
1	26.4	4WD access to the coastline shouldn't be affected by this management plan, and any person's ability to travel to the coast should not be compromised in any way	Coastal access is provided for	2(g)
1	26.4	We recognise that the majority of recreation opportunities offered within the Parks can only be accessed by four wheel drive vehicles and therefore encourages CALM to not close any further tracks within the Parks	Coastal access is provided for, and overall access is increased from previous plan	2(g)
1	26.4	The DMP states on P79 that over 80% of park visitors used four wheel drive vehicles to enter the park. If tracks are closed off this would eventuate in a large number of people unable to participate in outdoor recreation activities	As above	2(g)
1	26.4	Man made tracks over dunes have a negligible effect in dune movement. Natural elements dictate dune movement	This is incorrect as dune vegetation is affected	2(g)
1	26.4	I trust that with the ever increasing height of the sand dunes that this will not be used as an excuse to close our beaches. Some two months ago the Warren River washed away the access track to Yeagerup Beach and up to the present time no alternate access has been provided to this popular beach	It is feasible that some intervention will be used to prevent Yeagarup Dune closing current access, however natural processes can not and should not always be stopped in conservation areas	2(c), 2(d), 2(e), 2(f)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	26.4	Access to most parts of the Shannon and D'Entrecasteaux National Parks is by four wheel drive vehicle and is enjoyed as a recreational value by many. Whilst it is at times required to close certain tracks due to inundation by water (Malimup Track), bird nesting etc, any other closure should be conducted by public consultation only	The management plan indicates which tracks will be permanently closed, and which ones will be seasonally closed. Any additional closures will only occur after appropriate consultation with the community and approval from the Conservation Commission (see Action 2 from DMP)	2(d), 2(e)
2	26.4	p90 key points: All good but why don't 4WD users get vehicle wash-down stations for disease control when bushwalkers get boot cleaning stations?	Vehicle access tracks are generally located and maintained to minimise the risk of disease spread into disease free areas. Walkers are not as constrained by existing tracks and have the potential to carry the disease into remote disease free areas. Departmental staff are trialing portable "self contained" vehicle clean down stations. It may be feasible to introduce this as a measure at some point in the future depending on the values at risk	1(c)
	26.5	Management Access		
1	26.5	I request occasional access to "management access" tracks for study purposes	Management access tracks are sometimes used by the Community and the Department on occasion for research and monitoring. Contact the District Manager regarding your requirements if they are of benefit to the management of the parks	2(c), 2(h)
1	26.5	Seeking the opportunity to work with CALM and other stakeholders to review the network of existing logging and/or management tracks with a view to designating an appropriate network of tracks for the use of registered, silenced, trail bikes	Only the tracks shown on Map 10 and in Appendix 11 will be available for public vehicle use - for licensed car, motorbike and trail bike alike. Management access tracks within the parks are not appropriate for public vehicle use	2(d), 2(e)
2	26.5	We particularly agree with the important points made about the reality of physically restricting access. Back to the permit system!	There is the same resistance to abiding to permit systems as to closing tracks	2(a), 2(d)
2	26.5	The DMP acknowledges the impossibility of preventing access to the park by off-road-capable vehicles, through the use of barriers etc. Education alone is insufficient to change the habits or overcome the will of certain elements. Effective penalties are needed to back up management intentions	Infringements can be issued under the Conservation and Land Management Regulations 2002, section 47	2(a)
1	26.5	Map 10. 270 degree track is management access only	Noted, track will be removed from Map 10	1(e)
2	26	key point 7: Another point similar to this one needs to be added: 'Many track terminuses near the coast include clearings made for the purpose of vehicle based camping. Extensive vegetation damage, littering, unsanitary disposal (i.e. non-disposal) of human waste, even fire damage, are typical at these sites	Noted, this is mentioned in the camping section, para 1 p108	2(d)
2	26	p86 strategies: All good but re-iterate it is time to introduce an access permit system, clearly needed for 4WD users, but extending to all users, certainly large 'organised user groups' of that is the 'politics of equity' needed to do it	This would be very hard to enforce for the whole park and would not be the best use of resources. However, some tracks and camping areas will be on a permit only basis	2(d)
3+8	26	Supports the closing of roads and tracks as proposed in Appendix 11	Noted	2(a)
1	26	The Vehicle Access Strategy in Appendix 11 is an excellent approach	Noted	2(a)
4	26	Support closing other tracks that adversely impact on the wilderness, conservation and other values of the parks	Noted	2(a)
1	26	I support the closing of roads and tracks as proposed in Appendix 11. I suggest that the first 30 metres be deep ripped and direct seeded with appropriate provenance species ensuring permanent closure	Noted, appropriate rehabilitation will be undertaken on a case-by-case basis	2(a)
1	26	Commend the plan's rationalisation of existing track system	Noted	2(a)
1	26	Closing many of the access trails to the public will be beneficial for the national parks	Noted	2(a)
8	26	P85 Advocate that existing tracks and routes be kept open and are extended, more tracks to more places, less pressure on existing tracks	This is not how it works, more tracks to more places leads to increased visitor pressure that may not be sustainable in the long term as well as unnecessary duplication in some instances	2(e)
1	26	All existing tracks to be kept open	Sufficient access will be provided	2(e)
1	26	Should we stop access to all sites or any - No, there is no proof the environment has changed in the past 100 years e.g. the sand dunes will move whether you are there or not	The spread of disease, weeds and erosion is an indication of the changes	2(g)
1	26	We have been advised that a review of access points into the D'Entrecasteaux National Park is underway by CALM. This was understood to be occurring some two years ago and has yet to be completed. The delays continue to frustrate Council's attempts to address this problem. Council has also approved signs directing visitor traffic to the western entry to the D'Entrecasteaux National Park when conditions leave the central point of access (Black Point Rd) closed due to winter inundation	The review referred to is part of the draft management plan. Departmental staff are available to discuss issues with local stakeholders via the District Manager at Pemberton	2(a), 2(b)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
8	26	I and other 4WD Club members have often assisted CALM with repair and realignment of tracks on a voluntary basis and will continue to do so. We have also assisted CALM Rangers in other maintenance work e.g. clearing old fence lines and removing old car bodies and will be happy to assist CALM wherever possible in order to keep access to tracks open	This is always appreciated and valued	2(a)
2	26	Map 10 The public access roads and tracks must be made "all weather" and clearly defined with permanent public access forever	It is not appropriate or feasible to provide all weather access everywhere	2(e), 2(f)
1	26	The Windy Harbour Road (now bitumen) was once a sand track and improving it has not damaged the environment in fact it has improved the situation	A range of access opportunities are provided in the park including sealed 2wd roads were it is appropriate and the increased number of visitors is considered sustainable	2(c), 2(e)
1	26	My wife and I find reference to closing/removal of the Scott Road Bridge as extremely worrying as this constitutes the only access to our private property	The Shire of Nannup is the lead agency as it is a shire managed road. Negotiations are continuing between the Shire of Nannup and Main Roads WA to progress this issue	2(c), 2(e), 2(f)
1	26	The present access to the eastern section of the D'Entrecasteaux National Park consists of a gravel/sand track (Scott Rd) leading to Bridge 3977 over the Donnelly River. The bridge is in poor condition and is likely to be closed by Main Roads WA upon next inspection in 2006. The bridge is contained solely within the CALM estate. The bridge provides year round visitor access over the Donnelly River into the National Park. There are two freehold properties (locations 2928 and 13101) that also use the bridge as an access point. The Shire of Nannup Council has resolved that it be replaced once funding can be obtained (note at a location 500 metres upstream from the present site). The bridge however is not considered a funding priority by Main Roads WA due to the small number of properties that it services. It is the funding of the bridge replacement which remains the stumbling block. The crossing is understood to be used primarily for fire access purposes and at Council's insistence, locked gates have been installed	As above	2(c), 2(e), 2(f)
1	26	CALM Pemberton have advised that the bridge does not serve any purpose for their operations and have constructed an unauthorised summer crossing point of the Donnelly River within a Council road reserve 500 metres upstream from the present bridge site. Prior to the gates being installed there was a report of one vehicle being trapped at the crossing	As above	2(c), 2(e), 2(f)
1	26	Once the bridge is closed the eastern portion of the D'Entrecasteaux National Park will effectively be cut off. This may suit CALM's philosophy of protecting national park areas, however, does very little to promote, encourage and manage the increasing numbers of visitors wishing to access the area. CALM directs visitors by signage to sites such as Lake Jasper via the bridge yet so far has refused to take any responsibility for the replacement of the bridge contained within its estate. A CALM ranger has been stationed near the bridge site in the past collecting fees. Council estimates that 98% of the traffic using the bridge are visitors to the D'Entrecasteaux National Park	As above	2(c), 2(e), 2(f)
1	26	An option that has been discussed informally is a cost sharing arrangement for the replacement of the bridge. Main Roads have estimated the cost of the bridge replacement to be in the vicinity of \$600 000. Council may consider loan or other funding of a third of this cost if CALM and Main Roads contributed a like amount. The key to the matter will be CALM's position on making a contribution to the funding of the replacement of the bridge and the overall review of access into the D'Entrecasteaux National Park. This unresolved access issue may become further exacerbated should CALM not be willing to partner Council and Main Roads in funding the replacement of bridge 3977 as part of the future management plan for the D'Entrecasteaux National Park	As above	2(c), 2(e), 2(f)
1	26	We support the recommendation for all stakeholders including the Shire of Nannup, CALM and Main Roads WA to jointly fund the construction/upgrade of Reeves Bridge to allow continued access to Lake Jasper, Jasper Beach and more importantly, private property adjacent to the Donnelly River	Noted, as above	2(c), 2(e), 2(f)
1	26	CALM has recently erected barriers across the Donnelly River without any reference to us, the private property owners and nor have we been given keys. Please advise us of your intentions in regard to the bridge	As above, the Shire of Nannup is responsible for providing access to the private property along the designated road reserve and over Scott Road Bridge. The crossing over the river is for heavy vehicles such as fire trucks which can not use the bridge. Access to this low level crossing can be arranged by contacting the District Manager	2(c), 2(e), 2(f)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	26	Reeves Bridge, the access point to Lake Jasper and Jasper Beach has a very limited life and CALM have constructed a summer crossing point on the defined road reserve west of the bridge. It is our understanding that the Shire of Nannup has instructed a lock be placed at this crossing point which in turn will permit "management access only". This will therefore cut off any access to the lake and beach from the western end of the Donnelly/Black Point area. There is also no commitment by CALM to continue maintaining this access. CALM had not fully investigated the stakeholders requiring access across the Donnelly River, prior to locking the access	As above, and discussions are continuing for a practical solution	2(c), 2(e), 2(f)
1	26	We understand that the Reeves Bridge over the Donnelly River has a very limited life and the crossing established by CALM is unsuitable for public access. If a replacement bridge is not constructed then access from the western end of the Donnelly-Black Point area will be cut off. There is no indication in the plan that CALM is committed to maintaining this access. If it does not, then a further large section of the park will become a de facto wilderness area and access to Jasper Beach and Lake Jasper will become more difficult. We regard this as essential access and we support the recommendation of the Shire of Nannup that the Shire, Main Roads WA and CALM share the costs of replacement	As above	2(c), 2(e), 2(f)
1	26	Access to Jasper Beach and the Lake is currently over Reeves Bridge. I have been informed the bridge will be deemed unsafe within the next two years. When this happens access to these areas and private property will be denied unless the bridge is replaced. I therefore support the Nannup Shire in their efforts to replace the bridge with the cost to be shared between CALM, Main Roads and Nannup Shire. 98% of Scott Road traffic are visiting the D'Entrecasteaux National Park for some form of recreation therefore I believe CALM have a moral obligation to contribute to the cost of the bridge to provide all weather access	As above	2(c), 2(e), 2(f)
1	26	Further detail on the proposed treatment and maintenance of specific roads such as Scott Road and the intention for the existing bridge (3977) should be clarified within the management plan	As above, Scott Road is not part of D'Entrecasteaux National Park, it is the Shire of Nannup's responsibility. The management plan will clarify this	1(e)
1	26	Twin Karris Track - My recollection is this is an actively eroding track that may need reassessing on environmental grounds	Twin Karris track is in similar condition to a number of coastal access tracks. Ongoing access to Twin Karris can be managed and maintained in a sustainable manner. It should be noted that the track is currently within UCL [Quannup Pastoral Lease] and active management will increase when the lease area becomes National Park in 2015	2(g)
8	26	Bolghinup Track. Re-open	This track has been closed for over 10 years. There is no reason to reopen it, it passes through some swampy areas, there is to be no access to the dunes from this direction, motorbikes have been a problem here in the past and vandalism of Bolghinup Hut has also occurred	2(d), 2(e)
8	26	Dunes Road. Re-open	Dunes Road goes to the part of Yeagerup Dunes identified not to be accessed by vehicles. It is already closed to public access and is only used for fire management purposes. The track will not be reopened as there is already access to the dunes, and most of the access via Charley Road is through a Disease Risk Area	2(d), 2(e)
8	26	Tracks leading to Charley Rd. Retain as Open	This track was proposed to be closed in the previous plan. There is no reason to keep this access open. All existing access within the National Park has been reviewed as part of the Draft and a wide range of access opportunities have been provided to key areas of the parks	2(d), 2(e)
8	26	Silver Mount to the beach. Retain as Open	There is no reason to keep this access open. See above	2(d), 2(e)
8	26	Extension off Palm Road. Retain as Open	There is no reason to keep this access open. See above	2(d), 2(e)
8	26	Landslide Road. Retain as open	There is no reason to keep this access open. See above	2(d), 2(e)
8	26	Yeagerup Track. Retain as open with access through the dune system	The Department will keep the access track to Yeagerup Dunes open as long as practicable given that the dune is moving at approximately 3 to 4 metres a year. The Department is currently flattening off the track each year. However as the DMP states, the Department would consider other options, including alternate access over the ridge when necessary	2(a), 2(d), 2(f)
1	26	For last 30 years Yeagerup Dunes/Beach have been a traditional recreation destination	As above	2(a), 2(d), 2(f)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	26	In most places there is recorded a positive commitment to keeping the road across the Yeagerup dunes open, however in at least one place (p87 para 2) the comment is quite ambivalent. Bushwalkers need this road, and access to the Oilwell Rd (to a spring on the Warren River) for access to walking areas and to be able to prove the availability of drinkable water in the Warren River	As above	2(a), 2(d), 2(f)
1	26	A new road to be surveyed from the Yeagerup Lakes to the Yeagerup Beach	As above	2(a), 2(d), 2(f)
1	26	All efforts should be made to keep Yeagerup access open over the dunes	As above	2(a), 2(d), 2(f)
1	26	There is a need for CALM to commence the process of securing and committing to construct an alternate route to access the dunes and the coast given the likelihood that the current access will be blocked off in the short-term. As CALM is aware, Yeagerup Beach is a key fishing and recreational area enjoyed by visitors and locals alike	As above	2(a), 2(d), 2(f)
1	26	Whilst it is considered that CALM has undergone great lengths to preserve the track to the Yeagerup Beach via the dunal system, a definite decision to maintain that access should be made by CALM, however an opportunity to close the access track to Yeagerup Beach through this document is a reality. The unique dunes are and will continue to move in a natural form. Currently there is minimal area to construct an alternate route between the edge of the dunes and the nearby lake and wetlands. There could be no alternate route constructed having a minimal impact on the natural environment. We don't perceive that any form of management option can deter or alter the natural dune movement. Because of this, we consider that in the short to medium term the track into Yeagerup Beach may be closed. This in itself is an issue. A track constructed west of the lake will provide a sensible long-term strategic access to Yeagerup Beach	As above	2(d), 2(f)
1	26	A definite commitment should be made to retain access to Yeagerup Dune, if necessary by providing alternative access to the dune further to the west of Lake Yeagerup. It must be anticipated that the dune will continue to move back and forth over time and alternate access is a sensible long term strategy. Such an option would be precluded if a wilderness area was declared between the Donnelly River and the Yeagerup access track	As above	2(d), 2(f)
8	26	Oilwell Track. Retain as open	Access will be restricted along Oilwell Track. The end point facilities at Warren River do not have the capacity to sustain the increased use resulting from the upgrade of Oilwell Track as a fire boundary. There is also an area of dunes that have previously not been disturbed and retaining open public use along Oilwell Track would increase traffic into these areas. A permit system will therefore operate to manage visitor numbers to ensure it is sustainable	2(d), 2(e)
1	26	It states in the plan the beach may need to be closed between the Donnelly and Malinup due to birds breeding. In 35 or more years I have not once seen a birds' nest on the beach between the dune and water line for this reason the beaches should not be closed	Fairy tern and hooded plover nests are commonly a simple scrape in the sand and are very vulnerable to disturbance. Hooded plovers take approximately four weeks to hatch and are flightless for five to six weeks after that. The eggs and flightless chicks can easily be hunted and eaten by foxes, dogs and cats. Being highly camouflaged the hooded plovers are also accidentally crushed by pedestrians, four-wheel drive vehicles and trail bikes	2(e)
8	26	Tracks at mouth of the Warren e.g. to hut. Retain as access track for a camping area	There will be no formal camping in this area and the huts have been removed. The tracks pass through swampy areas, are not located well in the landscape and track duplication exist, therefore they will be closed	2(d), 2(e)
1	26	It is understood that the Warren River bridge will be closed in 2006 and although a summertime water crossing has been created this is locked and only authorised access is possible	Does this refer to the bridge over Donnelly River? If so please see comments above	2(e), 2(g)
8	26	Tracks which go into Meerup Dunes from private property - Retain as open	Already closed, no reason to reopen. All existing access has been reviewed and a wide range of access and recreational opportunities are provided throughout the parks	2(d), 2(e)
8	26	Tracks off Ladhams Rd - Retain as open	As above, no reason to keep open	2(d), 2(e)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	26	Summertime Track/Malimup Springs: Recently the Shire of Manjimup has resolved to close many un-named, unconstructed road reserves within the D'Entrecasteaux National Park and during that process, has identified that Summertime Track is not located within its gazetted road reserve, but is aligned to the east. Negotiations are underway to gazette the track where it currently exists, however it should be considered for the existing track to be realigned, avoiding the wettest sections and provide a suitable all-weather track to Malimup Springs	This is an issue to be discussed with the Shire of Manjimup. The best long term management options will be negotiated between the Department and the Shire at an appropriate time	2(c)
1	26	Malimup at the moment is only open in the summer months this is unacceptable as KOCO in the mid 1980s spent a lot of time and money to upgrade Summertime Track to all weather access with the understanding the road would remain open all seasons	Access to private property is an issue to be resolved with the Shire of Manjimup. Summertime Track passes through swampy areas and is seasonally inundated and any track improvement needs to be ongoing as the wet sections of the track continue to degrade and the number of track duplications increase. The owners of private property at Malimup have the discretion to close access to their property, although the Department has working with them in the past to keep the period of closure to a minimum	2(e)
8	26	Wheatley Coast Rd - Doggerup Track. Re - open	All existing access has been reviewed and a wide range of access and recreational opportunities are provided throughout the parks. There is no reason to re-open, has been closed for over 10 years. The track previously crossed sensitive erodable landforms and is seasonally inundated	2(d), 2(e)
8	26	Tracks to Lake Samuel and Doggerup Lake - Re-open	All existing access has been reviewed and a wide range of access and recreational opportunities are provided throughout the parks. These tracks are already closed and were only used by marroners. The opportunity to marron exists elsewhere and the lakes were suffering from vegetation loss and soil disturbance and compaction	2(d), 2(e)
8	26	Various tracks off Windy Harbour Road to lakes and waterholes. Re-open as seasonal tracks	All existing access has been reviewed and a wide range of access and recreational opportunities are provided throughout the parks. There is no reason to re-open	2(d), 2(e)
8	26	Lake Florence Track. Retain as open with seasonal access	As above, there is no reason to keep this access open	2(d), 2(e)
1	26	I support the closure of Tragedy Track	Noted	2(a)
8	26	Tragedy Track. Retain as open with seasonal access	There is no reason to retain as open, other tracks provide access to the same area but are better located. There are restricted and dieback sensitive flora located along this track and parts of the track are seasonally inundated	2(d), 2(e)
8	26	Blackwater Track. Re-open on a permit system	Already closed, no reason to reopen	2(e)
8	26	Lower Gardner Road. Retain as open	This track is seasonally inundated and impassable for much of the year, it is not well used and access to the area can be gained by a better located track	2(d), 2(e)
8	26	Tracks off Lower Gardner Road - Retain as open	As Lower Gardner Road is to be closed, these tracks will also be closed. Opportunities for marroning are available elsewhere	2(d), 2(e)
1	26	Mouth of Gardner - Tracks should be left open	Gardner Track is to be kept open and provides access to Gardner River	2(a)
1	26	Shire & CALM to fix Gardner River bridge	This is an issue for the Shire of Manjimup, as Chesapeake Road is a shire-managed road	2(c)
8	26	Lake Road. Retain as open	All existing access has been reviewed and a wide range of access and recreational opportunities are provided throughout the parks	2(d)
1	26	The fact that we use Buffer 2 road from Bevan Rd as the means of accessing Apiary Site 4029 is primarily to minimise any interaction with tourism on Big Trees Drive. It appears that Buffer 2 Rd is to be closed which means there will be no means of access to the site. I see no valid reason to cancel AS 4029 or to close Buffer 2 rd which provides not only Apiary Site access but management and fire access as well. It is a valuable site to our business	Buffer 2 Rd will be closed to public access but will be retained for management access purposes for the life of the management plan, however it is likely to be closed in the next 10 to 15 years. With approval from the District Office there can be continued access to the apiary site however there may be conditions placed on access, particularly as the road will not be maintained on a regular basis. Buffer 2 Rd will be added to Appendix 11	1(e)
1	26	AS 4028 is on Upper Shannon Rd, the apiary site is now located in an old gravel pit off Buffer 2 Rd (This arrangement was made by CALM when Big Trees Drive was established to avoid any conflict with the public as the old position was roadside on Upper Shannon Road). The site in its current position in the gravel pit is difficult to access from the Upper Shannon road direction due to a very tight turn off Buffer 2 Rd back up into the old gravel pit. The better access by far to the site is across Buffer 2 road from Bevan Rd. Also by using Buffer 2 road I minimise the interaction with the touring public and my vehicles on Big Trees Drive	As above	1(e)
1	26	Apiary Site 4030 is located on the edges of Strachan Rd. I understand Strachan road is to remain open	Yes as per Appendix 11 Strachan Road will remain open	2(a)
1	26	Apiary Site 4031 is located just off Martin Rd near the junction with Strachan Rd, I understand this road is also to remain open	Martin Road is outside the planning area	2(c)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	26	AS 5565 is accessed via Shannon 15 Rd. It appears that this road also is to be closed. Even though AS 5565 is not to be cancelled it will effectively become unusable due to the fact that there will be no means of access. The minimum access I need to maintain for AS 5565 is Shannon 15 road from Bevan road to the bee site location. If possible it would be desirable to continue to use the track to Dog road and Dog road to Bevan road if possible	Shannon 15 Rd is to be closed to public access but will be retained for management access purposes. Permission from the District to gain access along Shannon 15 Rd can be negotiated and can become a permit condition	2(h)
8	26	Pingerup Rd. Retain as open	Already closed, it is management access only. Most of the track was seasonally inundated, went through dieback infected areas, had several populations of rare and priority flora and did not access any known points of interest to the general public	2(e)
8	26	Laws Track. Retain as open	This was closed from proposals in the 1987 plan. Part of this track is now part of the Bibbulmun Track and needs to be vehicle free. Opportunities for marroning exist elsewhere	2(e)
8	26	Florence Rd. Retain as open	This track is not required for public use	2(d), 2(e)
1	26	Mottram's Fenceline Firebreak - Management Access	This will be reviewed as part the Master Burn Plan process and retained if appropriate to meet strategic fire management objectives	2(h)
8	26	Maringup Rd. Retain as open	Part of the Bibbulmun Track follows this track and needs to be vehicle free	2(d), 2(e)
8	26	Deeside Coast Road (South of Chesapeake Road). Retain as open and as near to existing route as possible	This track is seasonally inundated and is not used by private property owner as they use alternate access	2(d), 2(e)
1	26	Inlet River Road - Management Access	Management access has been removed, not required	2(d)
1	26	Tracks south of Chesapeake to East of Shannon River - Close	Springbreak Road and one unnamed management access track will be retained between Shannon River and Broke Inlet Road, all other tracks have already been closed	2(a), 2(d)
1	26	The access track that exists between Chesapeake Rd and the north-west shore of Broke Inlet should remain open	Does this refer to the overgrown fire break between Chesapeake Road and Broke Inlet? If so this track is no longer required for fire management and will be closed	2(b), 2(d)
1	26	North/South Track from Fisherman track to Broke Inlet is used by commercial tour operators and the public has requested it be kept open - suggest keep open possibly permit, as it is only seasonal access, as it is part of the Fisherman's Track	Map 10 and Appendix 11 are not consistent for this access track. There is a potential for disease spread when inundated, and the track is still wet when Fisherman Track is dry. However the track can be opened seasonally if it is realigned to avoid the granite outcrops and the junction at Fisherman Track is gated to allow a longer seasonal closure than Fisherman Track	1(e)
1	26	The track linking Fisherman's track to Broke Inlet near Clarke Island is shown on Map 10, but listed for closure in Appendix 11. We believe it should remain open to provide the only access to the eastern end of Broke Inlet (reference to the proposed campsites suggests that this is the intention)	As above, seasonal access will be allowed	1(e)
1	26	All vehicle access to the mouth of Broke Inlet should be prohibited, and the Fisherman Track should be closed just west of the camping area at Coal Point. This would mean that access to the mouth should only be allowed by foot and boat. The area has a very high scenic appeal to walkers and boaters but the wilderness experience is presently being spoiled through car activities over the silt flats and over the sand bar at the mouth. Overall the area west of Coal Point is too fragile to allow any kind of vehicle activities. The closing of the Fisherman Track at Coal Point would be even more desirable if the Broke Inlet estuary should be designated a Marine Park, and if the D'Entrecasteaux National Park should be incorporated in the Walpole Wilderness Area and eventually be included in the Walpole World Heritage Area. These events should occur during the life of this plan	Seasonal access to Broke Inlet mouth is considered appropriate at this stage, it is a popular recreation site and most of the impacts are centered on Coal Point. The Department is not aware of any environmental issues west of Coal Point. District staff will monitor for impacts over the life of the plan The designation of Broke Inlet as a marine park and/or the inclusion of D'Entrecasteaux National Park as part of the Walpole Wilderness Area are outside the parameters of this planning process	2(c), 2(d), 2(e)
2	26	Vehicles should be excluded from the region south of West Cliff Point extending between the ocean around the west and south sides of Broke Inlet and on to Walpole-Nornalup National Park. The shores and mouth of Broke Inlet are readily accessible by boat and Mandalay Beach is accessible by 2WD road. No further access is necessary, except perhaps limited access off Mandalay Beach Rd to Mottrams and Banksia camp huts, according to the eventual future planning outcomes for these. The management direction should be towards closing and rehabilitating all other tracks in the area. Use of the area would be on a permit basis. Practical management tasks could easily be undertaken by volunteer groups travelling on foot, as is common with track work for example in SW Tasmania and elsewhere	Tracks between West Cliff Point and Broke Inlet will be rationalised to a track to east Coodamurrup Beach (Hester Track) and one to West Cliff Point and a main track parallel to the coast to the vicinity of Broke Inlet mouth with three side tracks to the coast. These will be available either seasonally or on a permit basis. Changes will be made to Map 10 to clarify access for this area. Other tracks between Broke Inlet and Walpole-Nornalup National Park will remain open as per the DMP	1(e)
1	26	Lost Beach Track - Open four-wheel drive	Agreed	1(e)
1	26	Forth Road Beach Track - Seasonal Access (It's a water point as well, but I haven't been down it)	Does this refer to track to NW Broke Inlet? Management access only, Appendix 11 will be amended	1(e)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	26	Red Rock Track - Provide new car park well back from beach, may even mean track is closed depending on available sites for car park	Remain open, 4WD. Map 10 and Appendix 11 will be amended	1(e)
8	26	P86. Action 2 We advocate that no tracks are removed. If fragile areas are impacted on, it would surely be better to manage visitor impact by reinforcing or realigning tracks - removal will not answer as drivers will resort to illegal access. Better to control access than to deny it	In some instances the best management option will be to realign or remove tracks	2(e)
1	26	At this point in time Lake Jasper has been closed and will remain closed until Christmas 2005 following a fire some months ago. CALM state that this time is necessary for the regeneration of vegetation and restoration of the site. It is difficult to accept that access to Lake Jasper via existing non vegetated vehicle tracks necessitates the closure of the site for up to 12 months following a fire that affected only a small part of the site	Fire affects amenity of recreation sites, and in some cases it is necessary to close site to allow vegetation to regenerate and also while new infrastructure is rebuilt. In some cases some recreation sites are closed for 2 years after a fire	2(c)
1	26	Support re-opening the access to Lake Jasper and Jasper Beach	As above	2(c)
1	26	Make sure all roads are safe and in fair order for cars	Noted	2(b)
1	26	Commend the no 'off-track' driving	Noted	2(a)
8	26	Action 4. The Club cannot agree with this recommendation. Members do appreciate the sensitivity of the area and do their utmost to protect and conserve. It would surely be better to educate than "close off" - education brings much more appreciation of what is being experienced than "close the door and don't ever look" syndrome	The Club should be aware that it is Departmental policy that all vehicles within national parks stay on established tracks	2(f)
1	26	Support the concept of informative signage to inform users why tracks are closed or for management only	Noted	2(a)
1	26	Action 7, p86 refers to the cancellation of unnecessary road reserves contained within the National Park areas. Council has recently responded to a request from CALM in this regard and has not consented to the closure of any such road reserves. While the access issues relating to the Eastern Section of the D'Entrecasteaux National Park and Bridge 3977 over the Donnelly River are unresolved it is unlikely that Council would look positively at the closure of any road reserves contained within the D'Entrecasteaux National Park. Compensation for loss of land or a land exchange for the giving up of road reserve areas is a path that Council may wish to pursue, however, Council would most likely be happy with CALM contributing to part of the cost of the replacement of Bridge 3977. This hence needs to be stated in the management plan or reference to any proposed road reserve closures removed altogether as they are not CALM's to close. Alternatively and the preferred position of Council is for CALM to finalise a plan for the upgrading the overall access to the D'Entrecasteaux National Park	Noted	2(e)
1	26	Further detail within the draft management plan should address issues of access in relation to proposed closure of road reserves that are considered unnecessary. The provision of mapping within the management plan should clearly delineate such road reserves and provide rational justification as to why these reserves would not be considered useful in the long term for management, recreational or emergency access	The Shire of Manjimup has agreed to cancel all the unnecessary road reserves within the parks. The final plan will be amended to reflect this and state why the reserves are not needed	1(e)
1	26	We understand that negotiations are underway between CALM and the Shire of Manjimup to include the existing Malimup Springs Rd reserve in the park and gazette the actual alignment of Summertime Track as a road reserve. Before this is finalised we urge that the existing track be re-aligned to avoid the wettest sections and thereby facilitate all-year 4WD access to Malimup Springs	This is an issue to be discussed with the Shire of Manjimup. The best long term management options will be negotiated between the Department and the Shire at an appropriate time	2(c), 2(h)
1	26	The maintenance of vehicle tracks for fire control and forest management is clearly necessary for areas where disturbance has occurred. I question, however, the suggestion made on p 86 (action 13) that log trucks are permitted to access tracks in Shannon National Park. There is no reason why large, heavy vehicles should be permitted to spread weed seeds and fungal diseases through a national park	The draft plan also states that the Department will assess alternative routes for log haulage outside the parks. In some cases there is less environmental impact in using existing roads as opposed to upgrading old or constructing new roads	2(e)
1	26	If logging companies consider that it is not economically feasible to transport logs via an alternative route, then it might be considered that the economic value placed on native forest timbers is insufficient. By increasing the price of native forest timbers, logging companies would be able to justify travelling further and abiding by stricter disease control protocols while logging native forests. An increase in native timber prices would also encourage more efficient use of plantation timbers	Noted, however this is outside the scope of the plan	2(c)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	38	There is the issue of closing tracks to consider. What impacts closures may have on the beekeeping community for access possibly to other areas in the park	Access will continue to be provided via public access roads and tracks (see Map 12) and, subject to District permission, via management access tracks	2(d)
	27	Recreational Use		
8	27	I do not agree with the proposal to reduce or ban activities within the parks to "free" public usage when commercial tour operators can still conduct these activities - this is promoting an elitist clientele and is discriminating against those who cannot afford / do not wish to use commercial operations	It is a valid management method to restrict a specialist recreational activity for example such as horse riding, abseiling or caving to a commercial basis, as this can sometimes be regulated tighter, provide a safer environment for participants and minimise impact more than general open public use	2(d), 2(e)
8	27	Denying access and limiting the ability to undertake recreational activities is again an exclusionist policy - they should all be allowable and managed appropriately not closed off	As above	2(d), 2(e)
8	27	This DMP seems to advocate a reduction in access for activities such as cycling, horse riding, boating, waterskiing, fishing, surfing, swimming, sand boarding, abseiling, rock climbing, caving, hang gliding, scenic driving. Why? They are legitimate activities that should be available within the park or on the beaches adjacent to the park. Most of these activities also require access by 4WD vehicles to the appropriate areas	As above	2(d), 2(e)
	27.1	Active Recreational use in the Parks		
	27.1.1	Recreational Driving		
1	27.1.1	We do not support the practice of 4WD 'challenge' driving that results in damage to tracks or the broader environment. For that reason we support driver education and good driving practice	Noted	1(e)
2	27.1	The idea that National Parks are valid venues for developing and exercising highly advanced four-wheel driving skills in their own right, whether the parks contain sensitive terrain or not, needs to be actively demoted. The DMP rightly draws attention to this aspect of off-road-capable vehicle use but in a way that gives it a measure of validity in the parks, as if it can be catered for and there are no other suitable venues. Whatever the means of travel within the parks, strict codes of conduct, including 'sedate' speed limits for all vehicles, should be developed and enforced with appropriate resources. This would not include provision for 'challenge driving' because in soft or wet terrain the environment is too sensitive to erosion and damage and harder, rocky surfaces support fragile ecosystems (refer to rock climbing and abseiling)	Noted	1(e)
2	27.1	The DMP should include a copy of existing CALM regulations and penalties that apply, in appendix form	CALM regulations are available online at http://www.slp.wa.gov.au	2(h)
1	27.1.1	4WD clubs need education and also designated 4WD tracks/areas to tear around in instead of ripping up the main access track as they do to the Warren beach main access trail	Noted. National parks are not for this purpose, Shires often have designed off-road driving areas	2(a), 2(c)
1	27.1.1	As an avid 4WDer I take my family down into that area at least twice a year. We all enjoy the adventure of 4WD access through the dunes as well as the fishing in the area. I agree that the area needs to be maintained but I'm unsure of how you are going to be able to do it. 98% of the people I see using the area are responsible and stay on the tracks, take their rubbish home etc as they appreciate the eco balance of the area. I have witnessed vehicles deviating from the tracks in a belief that the track is "too chopped up". After a little education on tyre pressures and driving tactics most people respond well and keep to the tracks. Maybe you should be looking at the capability of people and vehicles using the area. Access could be conditional on having completed an approved 4x4 driving course, such as that offered by the WA 4WD Association or one of the many other vendors	Agreed that a lot of problems are caused by those drivers who do not stay on tracks and those who do not lower tyre pressure. However conditional access would probably be a bit limiting and so increased education would be preferred in this instance	2(e)
1	27.1.1	Was concerned to note that the Draft Management Plan makes almost no mention of recreational trail bike riding. Any mentions appear to assume that 4WD driving and motorcycle trail riding are equal in user and management requirements. While on the one hand it is pleasing that unstructured trail bike riding in national parks is not identified as a current problem that needs CALM's attention, the experience of other states indicates that, given the popularity of this activity, there is a likelihood of future user and environmental conflict if recreational trail bike riding is not recognised and planned for	Trail bikes, if licensed under the Road Traffic Act 1974, are expected to use the same tracks as motor vehicles. There is no provision for "off track" riding and there will be no separation of use at this stage	2(f)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	27.1.1	Recreational trail bike riders can move through an area faster than mountain bike riders and bushwalkers, and therefore are less likely to require facilities within the parks themselves. Usually a ride will start at one town and finish at that or another town where there are fuel and food facilities. This means that trail bike riders contribute little to the "recreational succession" phenomenon	They will contribute to the available recreational setting as will other vehicles	2(b)
1	27.1.1	It may be preferable to plan for the majority of recreational trail bike riding to occur in state forests, however, in the context of this management plan there is the issue of dispersion vs concentration, with the attendant recommendation that safety, avoidance of user conflict and environmental impact would be best managed by providing the greatest possible diversity of riding opportunities, rather than corralling trail bike riders into a few specially designated areas	As above, licensed trail bike riders are to use vehicle tracks within national parks	2(b), 2(f)
1	27.1.1	It should be recognised that many trail bike riders seek a combination of riding challenge and natural environmental attractiveness. These riders will be drawn to the beauty of the park environment - whether they are officially welcomed or not. Providing an authorised route will greatly simplify the task of gaining the cooperation of riders to avoid environmentally sensitive areas and avoid conflict with other park users	As above, also challenge riding would not be appropriate in the national parks	2(b), 2(f)
1	27.1.1	Trail bike riding is a legitimate recreational activity and trail bike riders have rights to use public land that are no less legitimate than those of bushwalkers, mountain bike riders and other active and passive groups	Trail bike riders have the same opportunities as four-wheel vehicle drivers. They will not be permitted "off track" or on bushwalking or mountain bike tracks	2(e), 2(f), 2(g)
1	27.1.1	Recognise the importance of sustainable land use, environmental preservation, safety of bike riders and other users and the need to provide physical separation to minimise conflicts between motorised and non-motorised recreation	Trail bikes (motorised) are separated from non-motorised - they are combined with two-wheel drive and four-wheel drives	2(g)
1	27.1.1	There is no distinct recognition of trail bikes in the context of recreational trail bike riding. The sole reference to motorbikes as 'sharing the same roads as motor vehicles' completely ignores the reality of motorcycle trail riding. Such a statement is akin to suggesting that synchronised swimmers can share the same beaches as surfers!	The beaches in the plan area are indeed open to surfers and synchronised swimmers alike. Separate tracks for motorbikes, trail bikes and motor vehicles will not be provided within these national parks. The objective of the track system within the parks is not to provide a motor vehicle play area, but to facilitate nature-based recreation and access to various interest points	2(e), 2(f)
1	27.1.1	The trail bike rider seeks a completely different experience to that of a scenic driver, preferring more natural terrain, something of a cross between that sought by recreational four wheel drive enthusiasts and mountain bike riders	Noted, however it is hard to justify the creation of a separate track system to fulfill this desire given the level of demand and impact of track creation and use to the natural environment within a national park	2(f)
1	27.1.1	While trail bikes and four wheel drives can share some tracks, this should not be the only option as it is a long way from ideal and can lead to usage conflicts and safety issues. Having four wheel drives and trail bikes sharing tracks can lead to safety issues for the trail bike riders	If the trail bike is licensed as a vehicle, then it is assumed that the DPI has assessed that the bike is safe to share the same track as a motor vehicle	2(f)
1	27.1.1	Trail bikes create significantly less environmental impact than four wheel drive vehicles, therefore treating trail bikes and four wheel drives as a single group would result in trail bikes being unnecessarily precluded from many potential tracks and trails - particularly old logging tracks. If the determinant of granting trail bike riders access to a particular track is the environmental impact of four wheel drives then trail bike riders are being unfairly penalised	A track proposed to be closed would only be because it is no longer needed, does not offer required access to a point or has an environmental impact. This would apply to both motor vehicles and trail bikes. Any track not required for public or management use will be rehabilitated	2(f)
1	27.1.1	Balance the issue of trail bike riding on nearby alternatives with the benefits of dispersion and the importance of gaining cooperation by providing authorised routes	The vehicle access provided are authorised routes. For your information a common management planning principle is to concentrate use in 'sacrificial areas'. This allows one small area to be impacted greatly as even if the impacts are in the short term dispersed over a wider area, usage usually increases until you have significant impact over a large area. Further as you mention elsewhere it may more appropriate to cater for your specific needs of a single use track for trail bike riding within a different tenure such as State forest	2(f)
2	27.1	p87 key points: There is a need to consider the introduction of 'low impact speed limits' for all roads and tracks on park land. These would be in addition to the normal road rules	This will be investigated, however would be hard to enforce	1(d)
8	27.1.1	P 87. Action 4 Can not agree with this recommendation. Members do appreciate the sensitivity of the area and do their utmost to protect and conserve. it would be better to educate than "close off" - education brings much more appreciation of what is being experienced than "close the door and don't ever look" syndrome	Noted, all areas proposed to be vehicle free are already vehicle free, it is just maintaining this for the rest of the plan	2(d), 2(e), 2(f)
2	27.1	p87 Action 5: Change to: "Develop and distribute an appropriate code of conduct and special driving regulations (in addition to the normal road rules) for all vehicle users in national parks"	There are already regulations regarding vehicles within the CALM regulations 2002, and direction within the Department's policy statement 18 and the final management plan. A code of conduct or similar should be sufficient	2(g)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
	27.1.2	Bushwalking		
2	27.1.2	pp88-89: A thorough treatment overall!	Noted	2(a)
1	27.1.2	Simple (low-invasive) walking tracks should be established where many of these old 4WD tracks currently exist	Often the alignment of a walking track will follow an old alignment of a vehicle track. Proposed walk tracks are outlined in the plan, and if any further walks are required, then it may be appropriate to use an old vehicle track	2(a), 2(h)
1	27.1.2	Convert Florence Road from Windy Harbour Road to Lake Florence to a walking track for study and documentation purposes. This will discourage casual visitors who only want to see sites they can drive to	Key opportunities have been identified in the draft plan and these are the priority for development. If resources allow, then other opportunities will be considered during the life of the plan	2(d), 2(f)
1	27.1.2	We support the construction of new walking trails as required but urge that their provision does not precede demand so that recreational pressure is not unnecessarily accelerated	Noted	2(d)
1	27.1.2	Table 7, p88. All those listed are class 2, 3 or 4. We would like to see a much longer list of tracks of this standard and are happy to help	Noted, the draft identifies further walks of this standard in table 8	2(a)
1	27.1.2	Table 7. Pt. D'Entrecasteaux walk is called Pupalong Trail, this is important as it's the Aboriginal name for the area	Noted	1(b)
1	27.1.2	Table 7. Mandalay Beach Track Access 2, 1km return (Access beach and interpretation)	Noted	1(a)
1	27.1.2	Table 7. Bottleneck Bay Class 3 200m temporarily closed until it can be stabilised	Noted, however not classed as walk trail for walking purposed, it is more an access track to the beach	2(h)
1	27.1.2	Table 8, p 89 refers to 13 bush walks. These require good maps, available in the CALM Perth office, walking clubs and local tourist bureaux and visitor centres. Are the walks also suitable for cycling, which is becoming more and more popular, especially with the Munda Biddi Track coming into the region?	The District office in Pemberton should be able to provide maps for the walking trails as they are created. No the trails are not suitable for mountain biking, this activity will only be permitted as per the guidelines in the cycling section of the draft. That is, on the access roads available to motor vehicles and the Munda Biddi	2(b), 2(c)
1	27.1.2	Table 8. Salmon Beach to Windy Harbour to give a loop walk Class 3-4	Key opportunities have been identified in the draft plan and these are the priority for development. If resources allow, then other opportunities will be considered during the life of the plan	2(d), 2(f)
1	27.1.2	Table 8. Carey Brook Camping Area to Donnelly Boat Landing Class 3	There is no demand for this walk at the moment and no capacity to develop it during the life of the plan	2(d), 2(f)
1	27.1.2	Table 8. Charley Road Class 5-6 (This would probably include the Boat Landing Road to Yeagerup Dunes walk, but Boat Landing to Yeagerup Lake via the dunes would be another walk if walking along the dunes was OK from a safety perspective, you'd need to check with the Donnelly District	Key opportunities have been identified in the draft plan and these are the priority for development. If resources allow, then other opportunities will be considered during the life of the plan, however in this area need to not impact on wilderness values	2(d), 2(f)
1	27.1.2	Table 8. Yeagerup Lake Walk Class 3 ? Its to be interpreted	This is adjacent to the parks	2(c)
1	27.1.2	Table 8. Coastal Walk, Black Point to Mandalay Beach Class 6	As above, key opportunities have been identified in the draft plan and these are the priority for development. If resources allow, then other opportunities will be considered during the life of the plan	2(d), 2(f)
1	27.1.2	Table 8. Banksia Camp walk 1km Class 4	Noted	1(e)
1	27.1.2	Table 8. Crystal Springs to Mandalay Beach Track 9km Class 4 (this will replace the proposed Crystal Springs to Woolbales as access to Woolbales is not to be promoted for conservation reasons)	Noted	1(e)
1	27.1.2	Table 8. Crystal Springs / Mandalay Beach / Long Point Loop 22km Class 4	As above, key opportunities have been identified in the draft plan and these are the priority for development. If resources allow, then other opportunities will be considered during the life of the plan	2(d), 2(f)
1	27.1.2	Table 8. Woolbales / Centre Road Loop 33km Class 4-5 (part not in park)	As above, key opportunities have been identified in the draft plan and these are the priority for development. If resources allow, then other opportunities will be considered during the life of the plan	2(d), 2(f)
1	27.1.2	Table 8. Not sure where West Broke walk is, will it be incorporated in the Coastal Walk ?	There is no demand for this walk at the moment and no capacity to develop it during the life of the plan	2(d), 2(f)
1	27.1.2	Table 8. Maringup / Mandalay Loop is a good idea	Noted	2(a)
1	27.1.2	Table 8. Pingerup Plains Walk Class 1 or 2 500m-2km	This may be in proposed wilderness	2(e)
1	27.1.2	Table 8. Fernhook / Mt Chance / Mt Pingerup / Deep River Loop Class 3 or 4, 1-2 days, 25.5km Trailhead Fernhook Falls	This may be in proposed wilderness	2(e)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	27.1.2	Opportunity to extend Bibbulmun Track to Augusta past wetlands and Scott River from Beedalup and then back to Beedalup along the South Coast. Recognise opportunity to call this part of track Bibbulmun Wajuk Track	Outside of the scope of the plan	2(c)
1	27.1.2	Add a western loop on to the Bibbulmun track from Beedalup, north along Gingalup and south along coast and call this part Bibbulmun Minang Track	Outside of the scope of the plan	2(c)
2	27.1.2	pp88-89 The risk of entrapment by wildfire is equally an issue for persons undertaking vehicle based activities. It would be interesting to compare the responses to wildfires and the results for people with and without motor vehicles at their disposal. We suggest that safety issues are far less serious for bushwalkers and other park users not employing vehicles for travel than they are for those who do	Noted, however this is not always the case as walkers rely on natural or created fire refuge areas - vehicles actually provide such a refuge as the fire passes. Refer to FESA fire safety and preparedness brochures	2(g)
1	27.1.2	Support the suggestion of increasing a variety of walking opportunities, especially those from short loop walks to longer wilderness walks in the Class 5 and 6 categories	Noted	2(a)
1	27.1.2	P89, para3 concludes with the sentence: "In particular, opportunities for Class 5 and 6 walks are absent and will be considered". Our member clubs for years have been walking routes from near Pemberton to the mouth of the Warren and back, around and across the Yeagerup Dunes and the Meerup Dunes to the beach, around Callcup Hill and Dumbakup Creek and Yeagerup Lake and criss crossing the Warren River and crossing from the Warren River National Park to the D'Entrecasteaux National Park. Some of these routes take a week and others only a day or two	There are no formal walks - the Department is aware that a number of people / groups undertake similar walks. The DMP considers formalising some of these opportunities	2(d)
1	27.1.2	Unfortunately the opportunities for class 5 and 6 walks are getting fewer not greater. We have watched with dismay as campsites we have discreetly used for camping whilst backpacking have been closed to four wheel drives, and then grown over and been lost to our use. We have watched with dismay as roads have been closed to four wheel drives but left 'open to walkers', have grown over and been lost also to walkers' use. We have watched with dismay while roads have been closed for general use, but left open for management use only, when we need to drive on these tracks to verify water supply. All this may be happening in the name of good management, but walking opportunities are reduced	Perhaps you are requesting Class 4 tracks to be maintained where vehicle tracks are closed. Class 5 track consists of limited modification to the natural surface and alignment may be indistinct in places. Minimal cleaning and debris along the track. This type of track gives visitors the opportunity to explore and discover relatively undisturbed natural environments along defined and distinct tracks with minimal, (if any) facilities. Users require a high level of specialised skills such as navigation and first aid and need to be self reliant. Class 6 consists of no modification to the natural environment. This allows for highly experienced walkers to explore remote and challenging natural areas without reliance on managed tracks. Users require previous experience in the outdoors and a high level of specialised skills such as navigation and first aid and need to be self-reliant	2(b), 2(g)
1	27.1.2	The walkers who use grade 5 and 6 routes should be well capable of camping in all weather and do not require shelters to be built. They would be much more appreciative of secure water supplies, or means to ensure that suitable water is available. We would be happy to work with you wherever we can to increase the opportunities for class 5 and 6 walk routes	Noted, an action will be added to state that the Department will work with walking groups to develop and maintain walking tracks	1(b)
1	27.1.2	P90 Strategy 7. Need a departmental standard on registers for bushwalking. How will we manage this and what expectations are there for CALM once we are notified? We need to be careful that the expectation is not that we will check them in and out along the way. Could be setting ourselves up. Bib Tk had a similar issue if you remember	Noted but outside the scope of the plan. Locally walkers will be encouraged to make contact on a more informal advice basis rather than a formal search and rescue basis - where failure to make contact at a scheduled time results in a formal search and rescue	2(d)
1	27.1.2	Strategy 7. Registration of bushwalkers (and all other activity groups) is to be with family or friends as the department does not have the capacity to offer a registration function. Visitor can notify the department of their plans as this will help in any subsequent rescue operation and they can write in visitor logs, which will help with VISTAT	Noted as above	2(d)
2	27.1.2	p90 strategy 9. Add 'in particular' after 'resource values' in the last line	This is not necessary	2(d)
1	27.1.2	Your maps do not say whether they are existing or potential walks, I think they're existing, a map of potential walks would be good	The text indicates that they are existing. There has been insufficient investigative work carried out to map potential walks so these will not be shown on the map	2(d)
	27.1.3	Cycling		
1	27.1.3	Concerned that CALM appears to be closing access to mountain biking within the parks. The provision of a long distance mountain biking trail will certainly be appreciated by users however, mountain biking is one of the fastest growing recreation activities in the State and there will be increased demand for areas to visit in the future. The provision of one long distance trail will not satisfy the demand of this very popular activity	There is no proposed decrease in access in the draft, the activity is already restricted to the same tracks as motor vehicles and this is not proposed to change. The proposed Munda Biddi will therefore increase availability in the parks	2(d), 2(e)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
2	27.1.3	Mountain bike use has the potential for considerable impact on natural areas. CALM, if it is not, should now be developing policies that envisage increasing future use of mountain bikes in natural areas and bring them into the planning process	This has been recognised, especially in the areas surrounding Perth	2(c)
2	27.1.3	pp90-91 Add 'facilitates close contact' after '.allows for disabled access and..'	Wording of draft preferred	2(e)
1	27.1.3	P91. Some mention of the focus on Mountain Biking at Northcliffe would be appropriate	Not necessary	2(h)
1	27.1.3	Mention that sandy areas are not good for cyclists, they get bogged!	Noted, this detail is not required	2(c)
1	27.1.3	Cycling for families should be provided for at Shannon. The Townsite Trail may be multiuse, and other longer trails would be appropriate, particularly as there are a number of old rail alignments which are relatively level	Noted. This would link in with the Munda Bididi project. If this is not built then trails in Shannon Townsite will be assessed as part of the ongoing development of the Shannon Townsite. A statement to this effect will be included in the MP	1(d)
2	27.1.3	Key Point 1. Mountain bikes have the potential to be used off-track. There is some confusion in the terms 'off-road' and 'off-track'. A bicycle is a wheeled vehicle and should be subject to the same terminology as all vehicles. It is also time to make the distinction between tracks that are suitable for four-wheeled vehicles and what are now increasingly referred to as 'single tracks', accessible along their length only be persons on foot and possibly two-wheeled vehicles. The terms 'off-road' and 'off-track' should have the same meaning, that is, 'not following a pre-existing road, track, trail or other discernable pathway'	Noted	1(e)
2	27.1.3	Munda Bididi Trail spelling is inconsistently in the document	This will be corrected	1(e)
2	27.1.3	It is assumed that, in the absence of a contrary statement, the DMP will allow mountain bike use on all tracks accessible to 4WD vehicles	This is the meaning of strategy 1, it will be clarified	1(e)
2	27.1.3	p91 Strategy 3: Delete the second word 'off-road'	The strategy will be clarified	1(e)
1	27.1.3	p91. Strategy 3. Not sure I like the word "off-road" for cycling. Maybe it should refer to a designated track. This is also referenced on page 82 under Motor Bikes and Bicycles	As above	1(e)
1	27.1.3	We strongly support the proposed Munda Bididi Trail on the provision that adequate resources are provided by the State for the long term promotion, maintenance and supervision of the trail	There is State funding provided for the track, funding available through Lotterywest grants and there is also a Munda Bididi Foundation that coordinates volunteers	2(a), 2(c)
2	27.1.3	Mountain biking is prohibited on the Bibbulmun Track so the DMP should say so	It was inferred in the draft, but will be made explicit in the final	1(e)
2	27.1.3	Has the possibility of restricting the use of some existing tracks in the parks to cyclists and walkers only been considered?	Yes, that is what the walk trails and the Munda Bididi represent, any other access track for vehicle that is being kept open is seen as necessary access	2(d)
	27.1.4	Horse-riding		
1	27.1.4	The plan ignores the fact that there is some historical significance for many of the recreational horse riders who use the parks. Much of the D'Entrecasteaux Park was frequently traversed by stockmen and their families for many generations as they drove cattle to leases within the park area from home properties. To a large extent, many of the recreational horse-riders are continuing a tradition passed on to them from past generations of family and friends	The historical horse-riding within the parks refers to the cattle droving, which is mentioned in the plan. There is no more cattle droving and as such there is no need to continue horse-riding other than for recreational reasons. The impacts of recreational horse-riding in D'Entrecasteaux National Park are not manageable and will not be permitted other than a stretch of beach from Windy Harbour to Gardner River. There will be investigation into establishing one or two loop bridal trails from Shannon Townsite using some of the disused tracks and/or firebreaks. Overnight tethering may be permitted at Shannon Townsite and horse-riding can continue on the public gazetted road of Deeside Coast Road and Chesapeake Road	1(b)
1	27.1.4	I and many of my age group (born in 1922) did a lot of camping out some 60 years ago for a particular reason, to protect our national park and keep our country free. We do not like to be told to "Keep Out"	It is necessary in order to protect values of national parks to sometimes exclude or modify visitor use, for example it is no longer appropriate for cattle droving to occur	2(b)
1	27.1.4	With appropriate consultation the criteria that permits horse riding in national parks can be met and so recreational horse-riding should be permitted within these parks	As above	2(d)
1	27.1.4	I strongly advocate that horse-riding activities should in due course be prohibited in National Parks. The time might have come that the CALM Act should be amended to the effect that commercial or recreational horse-riding activities are not allowed in national parks	Noted	2(c), 2(e)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
2	27.1.4	Horse-riding should be finally phased out in national parks, starting with this DMP. It is inconsistent with the purpose of national parks as refuges solely for native flora and fauna	Nature reserves are for the conservation of flora and fauna, national parks are for conservation and recreation. It is policy that horse-riding is not permitted in nature reserves, but is permitted in national parks if the activity is manageable	2(c), 2(e), 2(g)
1	27.1.4	I would like to see no horses at all in national parks	Noted outside the scope of this plan	2(e)
1	27.1.4	Horses should be restricted	The draft plan proposes restrictions	2(a)
1	27.1.4	The plan ignores the fact that in a regional context, access to beaches for horse-riders is virtually non-existent. Riding on the beach could be considered an 'iconic horse-riding experience' and would be rated as highly desirable by recreational horse-riders. Horse-riding on the beach has minimal and temporary environmental impact, particularly in comparison to other activities such as four wheel driving and recreational fishing. On a regional context, the vast majority of beaches from Cape Leeuwin to Albany are within national parks and inaccessible to horse-riders. The very few exceptions, where horses are allowed on beaches, are generally very small areas of high public use beaches where local council regulations do not specifically exclude horses. This is clearly inequitable and there is no valid reason why some access to beaches should not be made available to horse-riders	Horse-riding will be permitted on the beach between low and high water mark only from Windy Harbour to Gardner River	1(b)
	27.1.4	The severe adverse impacts of horse riding in forest/bush national parks is well known, e.g. introduction of dieback and weeds. The Kondil reserve near Nannup is such an example	Noted	2(a)
	27.1.4	The Shannon and D'Entrecasteaux national parks are magnificent assets suitable for compatible recreation. Horse riding is not compatible with these parks and there are other areas available for horse riding	Areas in adjacent state forest has been limited due to the new national parks being created	2(e)
2	27.1.4	Horse droppings carry weed seed/introduce weeds	Noted	2(a)
2	27.1.4	Conflict with other users, trampling and grazing of plants, spread of weeds and plant diseases are claims made against horse riding yet could be made against many users/other permitted activities in the parks	Noted. The DMP attempts to balance a range of recreational uses without compromising the biodiversity values of the parks	2(e)
1	27.1.4	Horse riding is singled out for banning whilst others users creating the same impacts are deemed 'manageable'	As above	2(e)
1	27.1.4	We hope that we horse-riders are a bit more respectful of our beautiful resources than what is stated in some of the reports	Noted	2(b), 2(c), 2(e)
1	27.1.4	We try to do whatever is possible to preserve and care for our precious resources	Noted	2(b)
1	27.1.4	The potential for damage by horses in the park is insignificant compared to the disturbance created to cater for other forms of recreational activity and ignores the evidence from the long historical association of horse riding in the park	The DMP attempts to balance a range of recreational uses without compromising the biodiversity values of the parks	2(e)
1	27.1.4	The families that have been horse riding in the parks have been in the area for 90 years or more. Could someone, anyone, show us the damage they may have caused. We have seen no country damage over these years	See the references in the DMP - Phillips (2000) and Newsome and Phillips (2002)	2(e)
1	27.1.4	When discussing the risk of spread of Phytophthora within the park by recreational horse-riders, it is important that it is discussed within the context of other high disease risk issues within the park, such as feral pigs, bushwalkers, motor vehicles etc	There are strategies proposed to manage all factors that may increase disease spread, horse-riding is not being singled out	2(e)
1	27.1.4	This submission recognizes there is significant potential for environmental impact by recreational horse-riders, including the potential spread of dieback. Even with good management, some impact is inevitable, however in the context of damage and risk of dieback spread caused by other recreational users, feral animals, high intensity commercial tour operators, park management and fire control activities, low levels of recreational horse-riding could be readily accommodated within the plan and managed sustainably	Noted. The DMP attempts to balance a range of recreational uses without compromising the biodiversity values of the parks. Park management and fire management activities only take place after an appropriate risk assessment and the inclusion of appropriate minimisation strategies and tactics	2(e)
1	27.1.4	While dieback is an often quoted serious concern for park management, the incidence and distribution of disease is not adequately mapped or delineated within the parks. This is of very grave concern to all stakeholders and interested parties of these parks, and makes sensible conclusions on the impact of recreational activities impossible to make	The approaches being taken to minimise the risks within the parks are described on pages 59 - 62 of the DMP	2(e)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	27.1.4	The draft management plan indicates social issues and conflict with other users is a potential problem in these parks. Newsome and Phillips (2002) discuss some of the evidence of conflicting social values attributable to recreational horse-riding. Much of this evidence is in fact drawn from studies in North America, and should be placed in the context of 'wilderness areas' vs national parks, much greater levels of park use and many other issues that are not directly relevant to conditions that exist in these parks. The authors do however refer to a survey of NSW park users and their attitude to recreational horse-riders, stating 60% of park visitors' rate recreational horse-riding as undesirable. These statements should be placed within the context of social conflicts in national parks generally. For example the same respondents would almost certainly rate other concerns equally or even more undesirable in national parks	The environmental and management issues associated with horse-riding are the main reasons for restricting horse-riding	2(e)
1	27.1.4	This submission acknowledges the social impacts horse-riding may have on other park users, but contends these conflicts and social issues can and should be managed by consultation, education and engaging various stakeholders, rather than excluding some users, segregating some groups of users and excessively accommodating other groups to the detriment of the environment and other users. Clearly what is needed is application of some common sense, understanding and tolerance of all park users needs	As above	2(e)
1	27.1.4	Of more impact than horse-riding are other activities in national parks such as: Park users that litter the parks with refuse, human faeces and toilet paper. Four wheel drive clubs, commercial operators or large groups that arrive in cavalcades simply for the enjoyment of testing their driving skills, which almost by definition, requires substantial environmental damage. Bus loads of tourists that dominate more accessible tourist points, briefly snapping a photo before departing in a cloud of dust from the massive car park constructed to accommodate them. Recreational fishermen littering beaches with fish frames, unwanted fish, fishing line and other paraphernalia that entrap and kill terrestrial and marine animals. Surfers, fishermen and other groups of people that set up large communal campsites, dominating certain areas, creating noise and visual pollution	The Department does not condone littering or other environmental damage by other users. The aim is to implement appropriate management strategies to deal with each issue to ensure the parks' values are not compromised	2(e)
1	27.1.4	Management of the parks during the lifetime of the previous management plan has failed to adequately monitor or document the environmental impact of recreational horse riders because the scientific evidence presented has been poorly interpreted and does not reflect the environmental impact of recreational horse-riding, real, potential or otherwise	The draft plan relies on published works by Phillips (2000) and Newsome and Phillips (2002). Departmental staff observations have indicated that during the previous management plan recreational horse riding was at a very low level. The majority of horse riding was centred on the Commercial Tour Operation based in the Fish Creek area	2(e)
1	27.1.4	One of the key performance targets for the previous management plan was that environmental impacts of horse-riding and other activities were to be monitored. The degree of impact caused by recreational horse-riders (vs commercial operators) has not been documented as was required by the previous plan. In fact, despite adequate opportunities during the last management plan to document actual impacts such as erosion, invasion of weeds and spread of Phytophthora due to horse-back riding, this evidence is notably absent. The conclusion clearly is that CALM failed to monitor the potential impacts as was required by the previous plan, or that monitoring failed to show significant damage	As above	2(e), 2(g)
1	27.1.4	Newsome and Phillips do not even address the most practical option for managing public horse riding that is, managing public use. Horse riding could be provided for not for profit groups such as Pony Clubs, Horseman Groups etc in a highly structured manner with use levels possibly linked to the levels investigated by Newsome and Phillips. I would suggest that limited horse riding opportunities could be provided with minimum threats to biodiversity	Managing pony clubs with a permit system was not considered a viable option. Commercial tour operators have a vested interest in managing their operations and use the area on a more regular basis. Where required remedial action can be taken against a commercial tour operator with far greater effect than against a volunteer management committee of a Pony Club or Horseman's Group that may visit the area infrequently	2(e)
1	27.1.4	Horse specific trails could be provided, as are for other activities, which would do away with this issue of the impacts of trampling	The vegetation and landforms are too sensitive in D'Entrecasteaux National Park, however as mentioned above, trails in Shannon National Park will be investigated	2(e)
1	27.1.4	There is no documented evidence that recreational horse-riding in the parks in the past has caused significant long-term environmental or social impacts that cannot be managed	There are a range of studies in protected areas including those quoted in the draft plan by Phillips (2000) and Newsome and Phillips (2002)	2(e), 2(g)
1	27.1.4	Recreational horse riding can be managed to prevent this activity conflicting with other values	It will be managed as outlined above	2(e)
1	27.1.4	Support the need for a code of conduct for recreational horse riding. This group endorses the code contained in the SFR Horse Management proposal and is prepared to assist or implement a program to monitor the effects of horses on the environment to the satisfaction of the Department	Noted	2(b), 2(c), 2(h)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	27.1.4	We support the use of processed food or seed free foods for horses prior to and for the duration of stay in the National Park	Noted	2(a)
1	27.1.4	The stipulation could be made that all horse riders are responsible for removing all manure from the park. Horses could wear special manure collecting bags	Noted	2(a)
1	27.1.4	The interpretations and conclusions of Phillips and Newsome (2002) are not valid, and should not be used to justify the exclusion of horse riding	It is not the role of Departmental staff to question the validity of the interpretations and conclusions from the research conducted by Newsome and Phillips. This is the role of the scientific peer review process. It is the role of Departmental staff to utilise the findings and conclusions in an appropriate manner to assist the Department with a direction for the draft plan that balances recreational uses with protecting the biodiversity values of the parks	2(b), 2(e), 2(g)
1	27.1.4	The plan claims that in Phillips and Newsome (2002) 'results indicated that low levels of horse-riding cause a significant degree of vegetation and soil impact, potential erosion, invasion and spread of weeds and Phytophthora'. This statement is misquoted, deliberately misleading, and also mis-referenced. The actual statement comes from Newsome and Phillips (2002) p69. The statement actually says 'that low levels of horse-riding cause a significant degree of vegetation and soil impact, potential problems of erosion, invasion and spread of weeds and Phytophthora, combined with limited management resources, etc, open access of protected areas for recreational horse-riding is inconsistent with conservation objectives'. It appears the original statement has been deliberately manipulated to express the view of "Park Management" and does not reflect the view of the original authors in the context of their publications. In fact, there are no studies documenting a direct causal relationship between low levels of horse-riding and erosion, spread of weeds or Phytophthora in the parks	Phillips and Newsome (2002) states that D'Entrecasteaux NP is highly susceptible to both vegetation and soil disturbance from horse riding activity and did document a direct relationship between horse-riding activity and impacts. The statement in the draft is not a quote, but is attributed to information presented in both Phillips and Newsome (2002) and Phillips (2000) and this is correct. Royce (1983) conducted a study in John Forrest National Park, assessing impacts on trails and concluded that development of new horse trails in national parks should be prohibited. The study found erosion, compaction, vegetation damage, presence of weeds, disease spread, grass tree cropping due to horse-riding activity	2(e), 2(g)
1	27.1.4	The draft management plan draws heavily on the publication of Phillips and Newsome (2002), Newsome and Phillips (2002) and an unpublished document by Phillips (2000). These papers have been misquoted, misinterpreted and used deliberately to present a biased view of horse-riding activity that is not consistent with the publications' conclusions	As above	2(e), 2(g)
1	27.1.4	Much of the 'evidence' of environmental impact draws on the publication of Phillips and Newsome (2002) which describes experimental environmental impacts of previously undisturbed transects within the D'Entrecasteaux National Park with treatments of 0, 20, 100, 200 and 300 passes within a 3-7 day period. The experimental design, while providing useful information to land managers, is fundamentally different from impacts by low levels of recreational horse-riding. The authors readily admit these findings are difficult to interpret in the context of the activities likely to exist in the Parks by recreational horse-riders. The authors note that frequency of use, party size, pace, user behaviour, time between disturbance and other factors will significantly affect environmental impact and that these factors were not considered in the study	Phillips and Newsome (2002) states that " <i>reducing horse use to low levels will not eliminate the impact problem since measurable impacts are apparently with relatively low levels of use</i> "	2(e), 2(g)
1	27.1.4	In both published articles the authors, Phillips and Newsome, while discussing various aspects of the environmental impact of recreational horse-riders draw few conclusions other than that further research and documentation of actual impacts is essential to understanding and managing the impact of recreational horse-riding in national parks. In fact, the only other conclusion made is that 'high levels of use and consistent horse-riding cause high levels of environmental impact and intensive horse-riding operations in Australian national parks are clearly non-sustainable'. This description in fact more aptly describes commercial operators than recreational users	As above	2(e), 2(g)
2	27.1.4	The statement that 'horse riding is inconsistent with conservation objectives and should not be allowed' is no more applicable to horse-riding than it is to every other recreational activity in the park and demonstrates a philosophical bias rather than a rational approach to a valid recreational activity	All other users are required to remain on tracks, except walkers in wilderness areas. All recreational activities are managed to protect the values of the parks. Some activities are more damaging than others and/or are less manageable. Therefore sometimes the best management option is to restrict the activity. Royce (1983) concluded that whilst horse-riders were only 4% of users of John Forrest National Park, their impacts were probably greater than those of all other park users.	2(e), 2(g)
1	27.1.4	The statement that 'horse riding is inconsistent with conservation objectives and should not be allowed' ignores the fact that provision of recreational opportunities is also a fundamental objective of national parks	Nature-based recreation that does not adversely affect conservation, cultural or other recreational values	2(e), 2(g)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	27.1.4	The argument that there are adequate opportunities for horse-riding in adjacent state forest is fundamentally flawed. In Map 2-Regional Context it is clear that a very large proportion of the adjacent state forest is planned to be added to 'the conservation estate', where horse-riding will almost certainly also be excluded. This will very severely impact on horse-riders access to public open space in the future	Due to this, one or two bridal trails from Shannon Townsite will be investigated, however there are still other opportunities available in the adjacent parks, refer to the plan for the Walpole Wilderness Area	1(b)
1	27.1.4	Where myself and a few others have ridden in the Shannon National Park, when I am on my horse, the branches of the beautiful Karri trees are body height and you look down into the valley some 20-30 metres at beautiful white trunks of the Karri trees. This is in comparison to the Tree Top Walk at Walpole. This Tree Top Walk is a good example of mechanical engineering but what a disappointment. Dull old Tingle trees to look at	As above	1(b)
1	27.1.4	What are gazetted roads? Are there any that currently run through the parks that CALM don't want horses on?	Gazetted roads are public roads managed by either MRWA or the local shire. They are not DEC estate and we do not have any say on whether horses are permitted or not. The final plan will clarify this and will show which roads and tracks are DEC managed	1(e)
1	27.1.4	The current management plan (and SFR horse route proposal) restricts public horse access to the junction of Deeside Coast and Chesapeake Roads. It is unreasonable to expect that riders upon reaching the road junction are required to return back on the very same alignment when they have travelled within an hour's ride of the best riding experience in the south of the state	Access will be restricted to the gazetted roads, therefore theoretically users could continue along Chesapeake Road in the direction of Walpole	2(e), 2(g)
1	27.1.4	Deeside Coast Rd is renowned as a cattle droving bridle trail that linked old pastoral lease locations formerly within the park. Both have heritage significance and within reason should be accessible on horseback as they were for well over 100 years	Deeside Coast Road is a public gazetted road	2(a), 2(g)
1	27.1.4	The fact that horses are classed as vehicles under the Road Traffic Act and are therefore permitted on gazetted roads, stems from the time when the early settlers used horses and buggies etc in the same way as we use vehicles today. The time might have come that the Road Traffic Act should be amended to the effect that commercial or recreational horse-riding activities are not allowed in national parks	Public gazetted roads are not just any road that is used by the public, they are reserved as public roads and managed by either the MRWA or the local shire. They are not part of national park estate even though they may traverse a park. Tracks that are part of a national park are managed by DEC and horses are not permitted unless by a management plan	2(e), 2(g)
1	27.1.4	We support continued access to the park by a commercial horse-riding operator	Noted	2(a)
1	27.1.4	We would like to be issued a 3 year operating licence. It is stated in your licensing documentation that to obtain a 3 year licence the operator requires accreditation. Could you advise us to whom could give us accreditation given that we have 23 years of impeccable insurance claim history, vast and extensive knowledge of the D'Entrecasteaux National Park, having spent 40 years both working and visiting the area and combined horse experience and knowledge between myself and my partner of more than 50 years	This should be dealt with through the general licensing process	2(c)
1	27.1.4	Our horse-riding business has been operating for 23 years and currently gains no recognition at all. In all the literature that we are required to complete for our licence, there is no mention of horse riding existing at all yet we have been one of the most successful and longest running businesses operating in the area. We are not mentioned on your website or as we have seen, any CALM literature at all. This not only frustrates but disappoints us greatly as we feel we are upholding a large part of this country's heritage which we feel is slowly being forgotten and pushed aside	The commercial horse-riding venture in D'Entrecasteaux National Park will be licensed using the tender process. To include information on your company in the management plan would not be equitable. Marketing of your business through the local tourist bureau would be more appropriate	2(c), 2(f)
1	27.1.4	Horse excreta dropped onto the ground creates a small patch of green vegetation. The combination of undigested seeds from pasture and horse feed and the nutrients contained in the excreta make this possible. I suggest that the licence should include a condition that an excreta bag must at all times be attached to the hind-side of horses	Noted. This will be considered in the review of the commercial tour operator's licence conditions. The current conditions include horses being fed only weed free feed for 7 days prior to entering the park	2(d)
1	27.1.4	The "weed-free-feed" licence condition is not enforceable as it would require the listing of over one thousand weed species including wild oats which horses must not eat while feeding out in their paddocks	As above, usually a horse is stabled so it cannot eat pasture grasses	2(d)
4+1	27.1.4	No renewal of the commercial horse-riding permit	The draft recognises that horse riding opportunities are best managed by way of a licensed commercial tour operator in D'Entrecasteaux NP	2(d), 2(e)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
913+4+27+6	27.1.4	Strongly oppose commercial horse riding in the park	Noted	2(c), 2(d), 2(e)
2	27.1.4	The proposal to allow one exclusive licence for a commercial horse-riding operation makes a mockery of many of the valid reasons given for prohibiting general recreational horse riding and excluding domesticated animals	A commercial operation can be regulated and managed more effectively than open recreational use	2(d), 2(e)
1	27.1.4	Commercial horse riding is totally against the spirit and intent of a national park	It is allowing an existing recreational use of the national park in a manageable manner	2(c), 2(d), 2(e)
1	27.1.4	Oppose the renewal of a commercial horse-riding permit which is in contrast with the management plan's approach to minimise impacts from introduced animals	As above	2(d), 2(e)
1	27.1.4	I think if you are going to ban recreational horse-riding then all horse riding in the park should be banned. Horses do damage to the soil and spread weeds and should not be allowed within the park and this should apply to all horses not just those who make someone money	As above	2(d), 2(e)
1	27.1.4	If horse riding has to happen at all, then certain tracks through areas either already degraded or already used by vehicles, or on the periphery, or where least damage to vegetation will occur or can be minimised, should be designated to all horse riding, not to just one kind of horse rider	Noted, however it has been found that only horse-riding on a commercial basis can be managed in the majority of D'Entrecasteaux National Park	2(d), 2(e)
4+27+2	27.1.4	Support the ban on recreational horse riding	Noted, however due to other comments some recreational horse-riding will now be permitted	2(a)
1	27.1.4	Action 3 states that recreational horse riding in the parks is prohibited but also states that horses are classed as vehicles under the RTA and are therefore permitted on gazetted public roads	Gazetted roads are public roads managed by either MRWA or the local shire. They are not Departmental estate, any tracks that are part of the national parks are not public gazetted roads and recreational horse-riding will not be permitted unless otherwise indicated for Shannon National Park	2(b)'
1	27.1.4	We approve of the policy that routes and corridors can be closed or amended as required seasonally or annually to minimise any identified impacts or to meet the needs of the Department	Noted	2(a)
1	27.1.4	We oppose the banning of private horse riding activity from the park	Private horse-riding will be permitted within D'Entrecasteaux National Park from Windy Harbour to Gardner River, between high and low water mark and potentially also along dedicated bridle tracks in Shannon National Park in the vicinity of the townsite. Horse riding is allowed anyway on MRWA and Shire-managed (public gazetted) roads, so from Shannon Townsite there would be a route along Deeside Coast Road and Chesapeake Road	1(d)
1	27.1.4	Your prohibition of this recreational activity is based on largely unsubstantiated claims of unacceptable damage or potential damage to the environment caused by, what has, during the lifetime of the previous management plan, been a low level of use in the Park	The Department supported an honours student to investigate impact of recreational horse riding and as a consequence recreational horse riding will not be permitted within D'Entrecasteaux apart from the beach near Windy Harbour	2(e), 2(g)
1	27.1.4	Prohibiting recreational horse-riding within the parks is at odds with the recreational needs of a relatively small number of park users that have legitimate claims for consideration	As above, recreational horse-riding will be permitted at the beach near Windy Harbour and also around Shannon Townsite in Shannon National Park	1(b)
1	27.1.4	All I and a 'half dozen' others want is to take a look at our (and yours) national parks and any other bush areas in the South West of the state where we live	Noted, there is sufficient access within the parks to all the attractions	2(d)
1	27.1.4	Keep some 'cattle stock routes' accessible for horse riding, as this is a non-indigenous heritage recreational activity to local communities, this activity gives the riders greater appreciation of the natural beauty of the 'bush' than those who choose to drive in a vehicle. At the same time recognising the hardships and joys of early settlers	Deeside Coast Road and Chesapeake Road are available	2(g)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	27.1.4	We have camped and ridden the Shannon and D'Entrecasteaux Parks and our camping places are a way ahead of the designated places. We have camped near old cattle yards built by cattlemen and women many years ago. With a little attention we are able to hold our horses in these historic yards. But we do not want heaps of people to visit these places. We are asking permission for ourselves and a few friends from the suburbs. Other riders who enjoy our outdoors have been from Germany, England, Italy and North America	A site at Shannon Townsite may be investigated for tethering horses over night. Otherwise no horses are permitted to be kept overnight in the parks. The commercial horse riding operation uses a private enclave for overnight tethering	1(b)
1	27.1.4	Accreditation permits are necessary please ask your Department if they can issue obviously good campers like us with them. In our area we would only want a couple of such permits. We good campers despise the untidy ones and tourists who throw rubbish from their vehicles and the vehicle exhaust fumes probably do more damage to forestry and bush country than any horses would	As above, camping with horses may be permitted at Shannon Townsite	1(b)
1	27.1.4	Prohibiting recreational horse-riding does not adequately consider the recreational needs of horse-riders	Not everybody's recreational needs will be met in national parks. However there are some proposals to provide some opportunities as outlined above	1(b)
1	27.1.4	The CCWA should encourage people (tax payers!) to see, enjoy and therefore value all National Parks by designating some tracks suitable for vehicles and others for horse riders	As above, D'Entrecasteaux National Park is unsuitable for recreational horse-riding, other than the beach near Windy Harbour, and some trails may be designated at Shannon Townsite	1(b)
1	27.1.4	A range of riding opportunities is sought, subject to environmental and social impacts as determined by your organisation. The range of horse riding opportunities sought include the following and are consistent with the draft classification as proposed for the SFR horse corridors: day use trails, long distance trails and designated trails	As above, however only day use trails may be provided in Shannon National Park	1(b)
1	27.1.4	While it is obvious recreational horse-riding has environmental and social impacts that require consideration in this management plan, these impacts are manageable and CALM should engage with interested parties and stakeholders to develop a management plan for recreational horse-riders that will: (1) Provide reasonable recreational horse-riding access to some areas of the parks, including some beaches; (2) Minimise the environmental impact of recreational horse-riding on conservation values; (3) Integrate recreational horse-riding with other social and recreational values within the park; (4) Adequately monitor the environmental and social impacts of horse-riding (in the context of other activities within the park) in a scientifically valid and well-documented manner so that future management decisions can be made as is appropriate	As above	1(b)
1	27.1.4	No one can really see the bush country for all the tracks and trails are dangerous. Pigs have caused an untidy mess. Do not walk through the bush it could easily become your last. Horse riding is the only way to see it all, and how lucky we are to have so much freedom in this country to get away from the maddening crowd	As above	2(b)
1	27.1.4	CALM should consult with stakeholders to develop suitable routes and conditions of access for horse riding	The Department has had meetings with recreational horse-riders	2(b)
1	27.1.4	People wishing to horse ride are willing to conform to management directions. The horse riding groups have inputted to the process, have said they will abide by management restrictions such as feed control, seasonal access etc and yet no provision has been made for them	In this instance management directions include that horse-riding will be prohibited in D'Entrecasteaux National Park other than on a commercial basis along a designated routes, and near Windy Harbour Beach. Horse-riding day use trails will be investigated at Shannon National Park	2(c), 2(g)
1	27.1.4	Despite this and recent additional requests for horse riding opportunities in Shannon and D'Entrecasteaux Parks that were obtained as part of the WWA public input process (that were forwarded to you) no provision has been made for horse riders. It will make future dealings with this user group very difficult if you totally ignore their requests and yet continue to provide for many other user groups	Not all recreation requests can be met, and the expectation should not be created	2(d), 2(e)
1	27.1.4	If horse-riders have a more positive interaction with CALM over this issue they may be more supportive of other management issues	As above	2(d), 2(e)
1	27.1.4	Recreational horse-riding should be possible within the parks under a permit system that will allow monitoring of park use by horse-riders (there are numerous examples of 'restricted numbers of park users by permit' arrangements in many NPs in Australia)	Managing users with a permit system was not considered a viable option. Commercial tour operators have a vested interest in managing their operations and use the area on a more regular basis. Where required, remedial action can be taken against a commercial tour operator with far greater effect than against a volunteer management committee of a Pony Club or Horseman's Group that may visit the area infrequently or individual recreational riders who may never return to the area	2(e)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	27.1.4	Recreational horse-riding should be possible if horses are restricted to existing tracks and trails within the NPs (subject to dieback risk assessment) with limited exceptions	It is hard to ensure that horse-riders stay to tracks	2(e)
1	27.1.4	Horses should be allowed access to designated beaches	Horse-riding will be permitted on the beach between low and high water mark only from Windy Harbour to Gardner River	1(b), 1(c)
1	27.1.4	Some defined areas of 'free-range' riding should be made available subject to environmental monitoring impacts	The impacts of this are unacceptable	2(e), 2(f)
1	27.1.4	Some areas should be made available for camping or brief periods of rest where tethering or other means of resting horses can be accommodated. Old cattle yard sites within the parks would be very suitable sites, given the degree of pre-existing environmental impact at these sites and would also help preserve historical elements of park values that are rapidly being lost due to fires, vandalism, neglect etc	Recreational horse-riding will not be permitted in the majority of D'Entrecasteaux National Park and if day use trails are established in Shannon National Park, then overnight facilities may be provided at Shannon Townsite	1(b)
1	27.1.4	We would like to see the existing general public horse corridor located on Jasper Beach Road retained and developed as a component of the SFR horse management proposal	The draft plan attempts to balance a range of recreational uses without compromising the biodiversity values of the parks. This corridor was not considered to be sustainable	2(e), 2(f)
1	27.1.4	The proposed opportunity of riding along Deeside Coast Road could be retained but horses allowed along the '5 chained' or another parallel track by the road. Drainage issues could be addressed on this track if necessary to minimise environmental impacts or it could be seasonally available. Separating the horses from the vehicles would be much safer as well as providing a better surface for the horses. This was all discussed 15 years ago	Horses are required to remain within the gazetted public road reserve and this is not within the National Park	2(e)
1	27.1.4	There is great opportunity and merit in extending the bridal trails from Deeside Coast Road, possibly along the Old Deeside Coast Road utilising existing tracks for a short distance until able to link into existing commercial route to Mottrams ruins (potential campsite)	This area is too sensitive for unrestricted recreational horse use	2(e), 2(f)
1	27.1.4	Possible campground location and yards exist at Mottrams ruins. This area has been heavily impacted upon in the past and has a number of features that make it an ideal campsite location. Our needs as riders are small, our only requirements being basic facilities, such as toilets, yards and a nearby watering point. Our group is happy to assist in the construction and maintenance of the required facilities to your satisfaction. There is also a need for vehicle and float parking. One possible location could be the old gravel pit location near the "Y" junction on Moores Track	As above	2(e), 2(f)
1	27.1.4	There is great opportunity and merit in linking horse trails from Mottrams ruins to Coodamurup localities and to the corridor west of Broke Inlet	As above	2(e), 2(f)
1	27.1.4	There is great opportunity and merit in linking the area of the commercial horse riding west of Broke Inlet with the general Coodamurup area and Coodamurup Beach front. NB: Known sensitivities at Fish Creek and Lake Marringup to be excluded	As above	2(e), 2(f)
1	27.1.4	There is great opportunity and merit in linking horse riding trails to Gardner Beach via Coodamurup Beach to Windy Harbour Settlement and return	The majority of this area is too sensitive for unrestricted recreational horse use	2(e), 2(f)
1	27.1.4	From Chesapeake Road South a horse specific track would be required to link to Coodamurup Beach and this beach, Gardner Beach and Windy Harbour Beach could be used to link to Windy Harbour. Horses could then use Windy Harbour Road to return to Northcliffe if a longer trek was wanted	As above	2(e), 2(f)
1	27.1.4	The provision of unloading and possibly camping/tethering facilities at Windy Harbour (possibly on the old rubbish tip site that was previously disturbed), northern end of Deeside Coast Road (possibly in State Forest) and somewhere in the vicinity of Chesapeake Road could provide for weekend visitors and day users. Beach access is one of the main requests of local groups and the above proposal would provide beach access	Cannot comment on tethering facilities at Windy Harbour, however horse-riding will be permitted from Windy Harbour settlement to Gardner River along the beach between high and low water mark. The other areas are unsuitable. Unloading facilities will be investigated as part of the consideration of horse trails at Shannon	1(b)
1	27.1.4	Our group is willing to provide further detail of the fine tuning of possible routes. Group members are also very keen to participate in public workshops.	Noted	2(b)
1	27.1.4	CALM staff should adopt a pro-active, educational role with park users to maximise compliance with horse-riding regulations which should help enable horse riding to be managed	Educational material will be provided for horse-riding at Windy Harbour and Shannon Townsite	1(b)
1	27.1.4	Limiting horse-riding access to commercial operators is fundamentally inequitable to recreational horse-riders, particularly those that could not afford what is a relatively expensive tourism experience	Not all recreation experiences are able to be met in the one National Park. However, horse-riding will now be permitted from Windy Harbour settlement to Gardner River along the beach between high and low water mark	1(d)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	27.1.4	The report indicates that some activities e.g. equestrian will not be available for 'public' use, however tour operators may still conduct commercial activities. The Department encourages CALM to re-consider this policy to allow for these activities on an organised, non-commercial basis-potentially on a permit system-so as to not disadvantage those who cannot afford to pay commercial fees	As above. The Department's licensing program allows for tighter control of commercial horse-riding activities	2(c), 2(d), 2(e)
1	27.1.4	Restriction to only commercial operators for horse riding precludes public enjoyment beyond an initial commercial experience	As above	2(c), 2(d), 2(e)
1	27.1.4	A commercial horse-riding tour is an experience distinctly different from the type of horse-riding experience recreational horse-riders are seeking	As above	2(c), 2(d), 2(e)
1	27.1.4	There is a real and legitimate 'recreational need' by park users to horse-ride that cannot be readily met outside of the parks	In addition to the opportunities provided for the parks, there are other several horse-riding opportunities proposed in the Walpole Wilderness Area	2(c)
1	27.1.4	The proposal that all horse riding be in State Forest ignores the fact that all state forest is managed for timber production and there are therefore access issues in these areas as well as often being less visually appealing	Noted, however this should be able to be managed appropriately through the informal reserve system and other areas that are excluded from harvesting at any point in time	2(c)
1	27.1.4	Few, if any coastal areas in the south of this State can boast such ideal horse riding opportunities as the DE National Park. The openness of the country allows for excellent equine vision and the soft sand absorbs the jarring so often felt on other hard surfaces. It all equates to a superb ride. When you combine these attributes with breath taking panoramic landscapes and experience the magic of such a remote wilderness complete with wildlife you feel there is no other way to appreciate such a magnificent area	Noted, unfortunately the landscape is prone to erosion and is vulnerable to the impacts of recreational horse-riding. Therefore, the opportunity to appreciate the area will only be available through the commercial operation	2(e)
1	27.1.4	CALM to work with riding clubs and associations to develop signage, maps and a code of conduct to encourage riders to avoid wilderness areas and other closed tracks	This will not be necessary, other than possible day loops from Shannon Townsite, no recreational horse-riding trails will be provided. However, the Department will develop signs, maps and a code of conduct for this area, in consultation with horse-riding groups	2(b)
1	27.1.4	From time to time horses are presently being kept in holding paddocks in the leasehold enclaves. Once these enclaves will revert to Crown land in 2015, the keeping of horses within D'Entrecasteaux National Park will in any case no longer occur. In order to pave the way that the D'Entrecasteaux National Park may become eligible to be listed as a World Heritage Area, the keeping of horses in the leasehold enclaves should be discouraged already at this point in time	The Department can make the recommendation, however has no jurisdiction, especially as pastoral leases such as Qannup may use horses as part of pastoral operations	2(c)
	27.1.5	Boating		
2	27.1.5	This section needs to be divided into two separate ones: Motorised Boating, and Canoeing, Rafting and Sailing. As these activity groups are separate in three distinct ways: the level of potential impact, the extent of natural areas accessible and the potential closeness of contact that users feel with the environment	Noted, however given the discrete and limited locations for boating activity it is appropriate to keep them together	2(d)
2	27.1.5	The existing section covers motorised boating adequately. The Canoeing, Rafting and Sailing section would add aspects of the bushwalking section. Sailing issues would mainly relate to Lake Jasper and to the extent that it is treated as another waterbody 'within' the park-Broke Inlet. (Note that canoes powered by small outboard motors clearly fall within motor boating)	Given the low level of motorised boating that will be available within the parks, there is no need to have separate sections	2(d)
2	27.1.5	Agree with all the key points and strategies in this section	Noted	2(a)
1	27.1.5	Lake Jasper is hydrologically fragile and ecologically irreplaceable, any activity that places it at risk is unacceptable	Noted	2(a)
1	27.1.5	Agree with the concerns CALM may have with regard to overuse, and therefore the possibility of degradation of areas such as Lake Jasper and Broke Inlet particularly for the use of power craft. Surely good managers would identify and promote more suitable areas that are capable of withstanding greater traffic such as the huge inland lakes found in the Darkan and Plantagenet Shires that have been managed for multiple use	Plan amended to suggest nearby areas that can be used for powercraft activities, however it is not the Department's role per se to promote powercraft activities or assess whether these activities are suitable in these areas	1(d)
1	27.1.5	The DMP does not contain any documentation to support its claim that powercraft use on Lake Jasper has a detrimental effect on water quality or flora and fauna	There has been no targeted research on powercraft use on Lake Jasper (although there have been comments as part of other studies on impacts as per below) Pen (1997) singles out waterskiing on Lake Jasper (and Lake Unicup) as an example of an activity that threatens to degrade natural areas in the long-term, through infrastructure developments, effluent disposal, noise, odours, dust, trampling, littering, and erosion	1(e)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
			<p>Charlie Dortch, formerly of the WA Museum, the supervisor for the archaeological surveys found the lake environment and setting to be deteriorating steadily through intensifying human impact and he cites the ultimate cause of this, as the 1989 decision to allow water skiing (Dortch 1996)</p> <p>Robinson (1992) in his report on the flora of wetlands on the south coast of Western Australia, ranks Lake Jasper highly but states its conservation value was lessened by its high degree of accessibility and recreational use</p> <p>Dortch (1996) suggests that the lake's marron population has been overfished, and the birdlife has been disturbed by the "<i>racket and commotion of powerboats, motor vehicles, generators and stereos</i>". Apart from anecdotal evidence such as this, powercraft represents an unacceptable risk to the fauna values of the nationally significant wetland</p> <p>However the Department seeks to manage risk to the significant conservation values of Lake Jasper, therefore its not about what impacts have been shown to date, its about the potential impacts of powercraft use (and other recreational use). For example an oil spill would have an unacceptable outcome on the flora, fauna and water quality of the lake. The plan will be amended to clarify this</p>	
1	27.1.5	From the draft and from anecdotal reports, there also appears to be no evidence of fauna having been compromised in many years of boat use on the lake	As above	1(e)
1	27.1.5	There is no evidence that skiing has had an adverse impact on the conservation values of Lake Jasper	As above	1(e)
1	27.1.5	There is no proof that power boats are causing long term problems	As above	1(e)
1	27.1.5	I find the claim by CALM and DPI of destruction caused by power boats to the environment unsubstantiated. I object to the points on these pages regarding this claim	As above	1(e)
1	27.1.5	CALM will be better placed to look to existing management plans that permit heavy tourist traffic to similarly valuable areas that need to be protected from overuse e.g. the Pinnacles and Ancient Empires, and apply a sensible plan to protect areas in the southwest forests. Limited access to these wonders is managed in such a manner to allow visitors to enjoy a unique experience while protecting the wider area from environmental damage	Limited access is permitted in that other activities will be provided for	2(d)
1	27.1.5	Surely the negative effects of powercraft are true of any water body and not exclusive to Lake Jasper and Broke Inlet?	Yes this may be correct, this point was made in the draft. Power-craft use on Broke Inlet and other areas outside the planning area are however not the scope of this management plan	2(a), 2(c)
1	27.1.5	In the 20 years we have been using Lake Jasper we have not seen any change	<p>Noted. However steady incremental changes often go unnoticed</p> <p>Also the lake cannot be looked at in isolation, changes to the Lake Jasper area include increased rubbish, reduced vegetation cover from increased usage, increased conflict between users, arson which led to the site being closed for 12 months in 2004/5, vehicles accessing increased number of lake site points, vehicles damaging heritage sites and an instance of a Warren River cedar being cut down</p>	2(g)
2	27.1.5	We are not aware of any damage caused by us, environmental or otherwise	As above	2(g)
1	27.1.5	Our family has been skiing at the lake for 30 years and in that time we have not seen any harm come to the lake	As above	2(g)
1	27.1.5	CALM has facilitative the use of Lake Jasper and associated impacts by providing the boat ramp, BBQs, tables and chairs, grass area of the beach, campsites, road	<p>Noted, however the grass was well established prior to CALM management</p> <p>The 1986 draft plan sought to prohibit power boats on Lake Jasper. However, due to public reaction the 1987 final plan provided for the mentioned facilities at Lake Jasper, to try and confine impacts to a designated area. However, the number of users has increased significantly and users are not staying within the designated area</p>	2(b)
1	27.1.5	Is it only powercraft users impacting on Lake Jasper? We want substantial proof that it is powercraft use alone that is having a dramatic impact. If it is not only the powercraft users then why is the lake only being closed to powercraft users?	Different recreational activities have different levels of impact. As stated powercraft pose a risk to water quality and conservation values of the lake. Compared with for example non-motorised boating activities, which are less impact with regards to noise pollution and intrusiveness and there is no risk of oil spills	2(b), 2(e)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
			General visitation is also contributing to impacts in the Lake Jasper area, this is why other measures are being considered such as moving the camping area further from the lake's edge	
1	27.1.5	Flora and fauna suffer no more or no less from powercraft than by other recreational activities in the area, there is an increasing number using sail craft, canoeing, walking, cycling, camping, fishing, using campfires etc	As above	2(b), 2(e), 2(g)
1	27.1.5	Surely the issue is the number of visitors to Lake Jasper and the impact they have on the environment rather than a few local residents placing a boat in the water and water skiing for a few hours before returning home. This is a management issue that does not justify the closure of Lake Jasper to the traditional pursuits of the local population	As above	2(e), 2(g)
1	27.1.5	With regards to powercraft users having an impact on other water users, don't other users have an impact on us?	As above	2(b), 2(c), 2(d), 2(e)
1	27.1.5	We are look after and appreciate Lake Jasper	Noted	2(e)
1	27.1.5	We take care to maintain our equipment and to take our rubbish home with us, leaving the area as it was when we arrived	Noted	2(e)
1	27.1.5	If everyone told you how much they enjoyed themselves and what a great time they have when using Lake Jasper, I am sure there would be more positive feedback than negative feedback	Noted	2(e)
1	27.1.5	Powercraft use requires no more facilities than other water craft, they also have to be brought overland, often by trailer and require launching and parking areas	Noted, however there may be difference in scale and in mode of transport. Other water craft mostly used on lake Jasper include canoes and windsurfers, which can be often transported on the roofs of vehicles	2(e)
1	27.1.5	Surely the Avon Descent and the Blackwood Classic cause more environmental disturbance than waterskiing on Lake Jasper	Impacts of recreational activities outside of the planning area are not relevant. However, unlike these rivers, Lake Jasper is a closed system, in a conservation area and is one of the few undisturbed wetland systems left in the south-west	2(c)
1	27.1.5	The plan refers to powerboat use being allowed along the Donnelly River from the mouth of the river to Boat Landing Road and in the lower reaches of Gardner River, however there is no scope for safe conduct of water skiing in these areas	Powerboat use is permitted in these rivers as stated, however there are no gazetted water skiing or jet ski areas in these rivers and there was no proposal in the draft to create any	2(b)
1	27.1.5	The DPI do not have any significant outstanding Marine Safety problems with compliance at Lake Jasper. Vessel skippers who act irresponsibly are also witnessed at the many aquatic sites in the region	The DPI enforcement officers are located in Bunbury and response time is not sufficient to ensure compliance. DPI feedback indicates Lake Jasper does not experience a higher proportion of reported compliance issues compared to other south west locations, however the key Departmental issues are the risk to the conservation values and visitor safety through non compliance	2(e)
1	27.1.5	The local community does not receive the same government grants for recreation as those enjoyed in the city, we work hard to achieve advances towards suitable amenities and entertainment therefore the issues of managing bodies should not result in excluding traditional recreational pursuits	Noted, agree that local communities work very hard to get grants. However whilst there are disadvantages to living in the country, there are also many advantages Over time some recreational activities (e.g. shooting) may no longer be appropriate to the tenure and purpose for which the land is set aside as. Therefore sometimes traditional activities are excluded to meet the purpose of the reserve and/or the management objectives	2(e)
1	27.1.5	CALM seems to find sufficient funds to collect camping fees and patrol national parks. Amenities are also maintained in such areas as Lake Jasper and Broke Inlet so saying there are insufficient funds to enforce compliance with regard to waterskiing is just biased	The Department of Planning and Infrastructure are the body responsible for enforcing compliance The Department of Planning and Infrastructure do not have sufficient staff in Bunbury to regularly inspect Lake Jasper or to travel to Lake Jasper in time when there are compliance issues. They also do not have their own resources such as a boat or GPS equipment to maintain the marked water ski area It would be unrealistic to expect that there is an unlimited budget available for management of the parks. There will always be competing demands for resources and decisions will always have to be made on prioritising budgets Resource issues are only part of the rationale for prohibiting powerboat use	2(e)
1	27.1.5	I find the excuse for prohibiting powerboat use on Lake Jasper because of non effective use of financial and staff resources unacceptable	Noted, see above	2(e)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	27.1.5	The fees we pay in addition to a workable budget should cover management and enforcement of appropriate powercraft use	As above, also the fees collected for D'Entrecasteaux National Park cover only part of the budget required to manage the park	2(e)
1	27.1.5	Please speak to our committee KOCO and make Lake Jasper more manageable to all who wish to use this wonderful resource	The Department has considered the options put forward by KOCO with regards to Lake Jasper and it is considered that prohibiting powercraft use is the best management option in conjunction with other management actions for the lake's surrounds	2(e)
1	27.1.5	Various Departments within this State enforce management of unsociable conduct and carelessness towards the environment on a daily basis and it is not unreasonable that offences involving power boats can be referred to the Department of Planning and Infrastructure, and the Department of Environment can be called on to deal with oil and fuel spills	As above with regards to resources of the Department of Planning and Infrastructure. With regards to referring oil spills to the Department of Environment (now merged with CALM to produce the Department of Environment and Conservation), the objective is to maintain a high water quality and to prevent oil spills, rather than prosecute offenders	2(d)
1	27.1.5	The present government in introducing the Protecting Old Growth Forest Policy should have allowed an appropriate budget to deal with the changes. Sufficient budget should be provided to manage the resulting reserves and national parks not only for the wider constituency but also for the local community by conserving all values and recreation in the natural environment	The Government did allocate extra funds for implementing Protecting Old Growth Forest Policy in the south west. D'Entrecasteaux National Park is not one of the new parks and reserves under this policy Nature-based recreation values within D'Entrecasteaux National Park that are in keeping with the objectives of the park will be maintained	2(g), 2(e)
1	27.1.5	Responsible people would not involve themselves in such antisocial behaviour as to remove the buoys	Agree, nonetheless the buoy ropes were inspected by the Department of Planning and Infrastructure and this Department in January 2006, and it was agreed that the ropes to the buoys has been purposely cut. The Department assisted the DPI in replacing the buoy ropes with chains	2(b)
1	27.1.5	Regular maintenance of buoys should not be difficult to manage with reasonable co-operation with the managers and users	As above. The buoys have been replaced with chains, however this does not ensure that users will comply with marked area	2(d)
1	27.1.5	The reported vandalism of signs etc at the Lake also occurs at almost every boat ramp in our region. DPI have a marine safety sign repair schedule	Noted	2(d)
1	27.1.5	Vandalism is a problem throughout the whole world, for CALM to single out one specific area is unjust	Noted, however there is a higher level of vandalism at Lake Jasper than at Black Point for example The management plan is only planning for the parks, and in this context vandalism is a particular issue at Lake Jasper	2(c), 2(d)
1	27.1.5	It is the role of governing bodies to account for vandalism in their budgets	Noted, however governing bodies in effect pass on the cost of dealing with vandalism to the whole community. Therefore it is responsible management to minimise costs associated with dealing vandalism	2(e)
1	27.1.5	There is no justification for penalising local people just because visitors to the area may vandalise the signs	When signs are not working then other measures need to be taken. In other areas such as visitor risk management, if there are not funds to maintain signage, then the site/road is closed There is no evidence who is vandalising the signs, however when compliance signs regularly go missing this is usually representative of users' unwillingness to accept authority Vandalism issues are only part of the reason for prohibiting powerboat use	2(d), 2(e), 2(g)
1	27.1.5	Vandalism is not justification for banning one form of recreation, especially if it is not that group that are responsible	As above	2(d), 2(e), 2(g)
1	27.1.5	No written information could be given to us on vandalism. We have never seen any	Noted	2(b)
1	27.1.5	Is it only powercraft users that vandalise this area?	No	2(b)
1	27.1.5	I requested the cost of vandalism for Lake Jasper as compared to other points of access in the Park. As it was not provided I can only assume the cost is minimal	Vandalism issues are only part of the reason for prohibiting powerboat use	2(b)
1	27.1.5	I am sure with a little effort from all concerned, the buoys and signs could be fixed and maintained in a suitable condition, so rules and regulations could be followed by all users of the park	Signage does not always ensure compliance	2(e)
1	27.1.5	The marking of the ski and restricted areas can be improved by using better equipment and arranging inter-agency agreements to report anomalies to DPI when inspections are conducted at the Lake	The buoys have been replaced, however the DPI officers would still have to respond from Bunbury	2(e)
1	27.1.5	Have powercraft been witnessed operating outside the zone in Lake Jasper? Who reports these incidents? Do you receive a significant number of such complaints? Are they written statements of complaint or hearsay?	Yes, Departmental rangers have witnessed powercraft outside of zones, we have received both written and verbal complaints. Also users in their submissions have acknowledged that they operate outside of the zone	2(b)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
			However, the Department's position is that powercraft is no longer appropriate even within the designated zone	
1	27.1.5	We, our family and other regular users are more than happy to stay in a designated area. We are more than aware of the serious consequences of an accident in a relatively remote area and seek to avoid such incidents	As above	2(e)
1	27.1.5	It is acknowledged that power boats have operated outside of the pick-up zone. However this is because designated pick up areas have been occupied by campers and boat users have moved elsewhere to minimise disturbance and avoid conflict. This issue could be resolved by improved consultation in the development of ski areas	As above	2(e)
1	27.1.5	Through my experience of camping and skiing at Lake Jasper over the many years, the majorities of people skiing on the lake are responsible and abide by the water safety rules to ensure that everyone utilising the Lake has a safe and enjoyable time. I am positive that a compromise could be reached, where everyone who is fond of Lake Jasper will be able to use the lake for recreational purposes, with some strict boundaries	As above	2(e)
1	27.1.5	Lake Jasper is of significant size and can accommodate many and varied sporting activities at any one time	No it can not, the beach area around the lake is limited and even though the lake is large, there are minimal access points The designated swimming area is the focal point for all activities - the take off area for water skiing, mooring area for boats, it is sheltered, there is shade, there is year round access and it is the best place for picnicking, all as well as being the swimming area	2(g)
1	27.1.5	I find the claim by CALM and DPI of power boats a danger to swimmers unsubstantiated. I object to the points on these pages regarding this claim	There is a conflict between users for the same area	2(g)
1	27.1.5	We have never witnessed any conflict between multiple users	Noted. However we know there is conflict from ranger observations, the DPI, other visitor comments and other submissions	2(b)
1	27.1.5	In 30 years we have never had anyone complain to us about our boat or skiing. In fact on many occasions we have invited day users and other campers to join in and have a go	As above	2(b)
1	27.1.5	Visitors tend to camp in the take off/drop off area as there is shade and grass, which causes congestion	Noted	2(a), 2(d)
1	27.1.5	Swimmers and campers are usually in our ski area so we are trying to do the right thing by everyone by skiing elsewhere. However we can only ski for a couple of months a year and 8 out of 10 times we are the only ones there	This is an example of conflict between users and an acknowledgement of skiing outside of the designated zone	2(d)
1	27.1.5	On several occasions we have arrived at Lake Jasper for a weekend of skiing only to find the ski area full of campers, and on one occasion with tents pitched to the edge, with people swimming and resting in the shade. We didn't complain, we just moved to the eastern side and then got more organised with shade and BBQs and found we were out of everyone's way so we continued to use that area. I therefore recommend a change in the plan to have the eastern side designated for skiing	This is an example of conflict between users and an acknowledgement of skiing outside of the designated zone. The suggestion is noted, however as discussed in reference to other submissions, water skiing is considered incompatible with the objectives for the area and presents an unacceptable risk to the environmental and cultural values of the area	2(d), 2(e)
1	27.1.5	As a user of Lake Jasper with power boats I have found that the users of these boats take considerable care in dropping off their skiers to the left of the designated swimming area, at a safe distance, not to endanger the safety of those who are swimming	Noted	2(b), 2(d)
1	27.1.5	I have found that before skiing takes place, the boaters confer with each other and decide the pick up, direction and drop off points for the skiers, this is a safety procedure to make sure there are no accidents	Noted	2(b), 2(d)
1	27.1.5	Conditions vary day to day so skiers move to calmer waters, generally the eastern end of the lake	Noted, this is an acknowledgement of skiing outside of the designated zone	2(d)
1	27.1.5	Is it only powercraft users that impact on others?	No, for example the camping area will also be moved further from the lake and only a Day Use site will remain	2(d)
1	27.1.5	With effective management, there is an ability for multiple uses to occur which should meet wide-ranging objectives for Lake Jasper and the surrounding area	Multiple uses will remain, including day use and canoeing	2(d), 2(e), 2(f)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
			Only recreational pursuits that do not adversely affect ecosystems and landscapes are permitted in national parks. The lake is part of a nationally important wetland and also a site of Aboriginal significance. These designations also help set direction for the area. In particular, the objective for boating in the park is to provide for boating recreation activities that are compatible with protecting and maintaining conservation and cultural values without impairing other recreational activities	
1	27.1.5	Jet skis being a smaller vehicle can utilise approved areas in oceans and rivers, even many farm dams	Noted. Jet-skis are already prohibited in the planning area	2(b)
1	27.1.5	There does not appear to be any supporting evidence to substantiate powercraft use leading to shoreline erosion	There has been no specific research, however backwash can lead to erosion and water skiing is described as a threatening process to Lake Jasper (Pen 1997) potentially leading to degradation such as erosion	2(e)
1	27.1.5	In the years of going to Lake Jasper we have not seen any form of erosion	Noted. However steady incremental changes often go unnoticed	2(b)
1	27.1.5	There is limited evidence of erosion occurring at Lake Jasper	As above	2(b)
1	27.1.5	The extent of any existing shoreline erosion resulting from current and previous ski activity is not identified	As above. Also the draft only mentions to the potential for erosion	2(b)
4	27.1.5	Lake Jasper is generally used in summer when water levels are well below high winter level and wash from powercraft is minimal	The lake is not just used in summer, it is used from the October school holidays Water levels do not usually drop until after Christmas Low water levels in summer and/or drought years expose the Aboriginal sites which are then vulnerable to damage from visitor use	2(g)
1	27.1.5	In summer, we often get strong winds from all directions causing waves up to 0.5m, higher than the wake of a boat	Noted	2(b)
10	27.1.5	Winter storms and summer winds create greater wash/waves and bank disturbance than motorised craft	Noted, however the lake has been exposed to natural processes for 1000s of years and the plan seeks to minimise man-made disturbance to the banks	2(d)
1	27.1.5	When boaters pull away from the lake edge this is done at a distance from the edge so it doesn't cause damage to the propeller, so I don't understand how this would cause shoreline erosion	Use of the shoreline when taking off as well as high speed drop offs can lead to erosion. For this reason the DPI impose speed limits and other restrictions on watercraft to minimise shoreline erosion	2(b), 2(e)
1	27.1.5	Reeds surround Lake Jasper naturally minimising any risk of bank erosion	Until they get washed out	2(b), 2(g)
1	27.1.5	With regards to noise and visual pollution, Lake Jasper is big enough that waterskiing wouldn't affect scenic values across the whole lake. An area set aside for waterskiing shouldn't affect the view from every bank	As above, users congregate in one area Water skiing is an inappropriate activity in a national park that is valued for its remoteness and wilderness values The level of noise pollution is not consistent with nature-based recreation	2(g)
1	27.1.5	The public complaints regarding noise from vessels needs to be quantified	As above <i>"For those who want to get away from the noise and bustle of the city, the national park campsite on Lake Jasper's south-eastern shore is during the peak holidays truly a place to be avoided"</i> Dortch (1996b)	2(h)
1	27.1.5	Complaints about the visual pollution of buoys appears to reflect an unreasonable degree of intolerance of other users rather than a general issue of conflict	As above	2(e)
1	27.1.5	Noise is recognised as a potential area of conflict, but this can be minimised by educating potential visitors that motorised activities are permitted in this area. This is similar to the advertising of areas for generator use	As above	2(e)
1	27.1.5	The area is not identified as a candidate wilderness area in the Draft Plan, consequently water skiers could argue that noise from powerboats could be reasonably expected in an aquatic recreational area	As above, although the lake is not within a proposed wilderness area, the lake is still within a national park, one in particular that overall has been identified as having high values for remote experiences	2(e)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	27.1.5	There are numerous opportunities for quiet retreat in a riverine or coastal experience in the south west, for example Heartbreak Trail in Warren National Park. We are assured that people seeking quiet and tranquil experiences can be generous enough to accept that in some areas where its is suitable to do so they can share the space with people who may seek to recreate in a manner that is restricted in other areas	Lake Jasper is in a remote area, it is not in an urban setting or close to a large population centre, it is suited to promoting a remote experience Also it is not considered suitable to continue using powercraft on the lake for other reasons	2(e)
1 +27	27.1.5	We would like the highest level of protection for Lake Jasper and its surrounds. This is a significant Aboriginal site with evidence found of artefacts on Lake Jasper's floor	Agree	2(a)
1	27.1.5	Lake Jasper's cultural heritage sites should be protected. If the lake is only allowed passive activities, it should be easier to protect sites	Agree	2(a)
1	23	"...Archaeologists and divers from the Western Australian Museum identified a number of submerged Aboriginal sites on the bed of Lake Jasper in 1989 . . ." How long have these sites been submerged?	The sites identified on the lake bed and lake margins were prior to the lake being formed some 4,000 years ago	2(b)
1	27.1.5	Devil's Lair and Tunnel Cave are more significant than the sites in Lake Jasper	All registered sites are equally significant	2(g)
1	27.1.5	Dortch (1999) which we have attached in our submission refers to evolutionary and climate change and adaptability on Lake Jasper	Noted	2(b)
1	27.1.5	Aboriginal artefacts were first found by local people. A study of the area was then carried out by Charlie Dortch	Noted	2(b)
1	27.1.5	I find the claim by CALM and DPI of destruction caused by power boats to Aboriginal artefacts unsubstantiated. I object to the points on these pages regarding this claim	Dortch (1990) cites that site 10 has already been destroyed by powerboats and people at the original boat landing. Also that " <i>continued powerboat usage, more than other visitors' activities, will eventually result in physical damage to some shoreline sites</i> " similar to the case of site 10	2(g)
1	27.1.5	Power craft use will cause no more disturbance to Aboriginal sites than nature itself	As above	2(g)
1	27.1.5	Aboriginal significance of Lake Jasper is a very flimsy excuse for wanting to close the lake. The likelihood of boat owners or water skiers disturbing Aboriginal artefacts is no more relevant than any other Lake user. The Swan River was an area frequented by Aboriginal people much more than Lake Jasper but we do not see boating prevented on the Swan	As above	2(c), 2(e), 2(g)
1	27.1.5	There is no question that some most valuable artefacts and information have been found at Lake Jasper and surrounding areas that are of benefit to not only the Noongars, but to the whole community with regard to history of this continent. However, the lakebed is hardpan... " <i>several stone artefacts from this site are embedded in the cemented lower part (or hardpan) of an old soil.</i> " Therefore the use of powerboats is unlikely to cause erosion action on the bottom of the lake, or on its shores	As above. Also sites have been exposed when there are low water levels	2(g)
1	27.1.5	There is no evidence of submerged trees or debris where we water ski	As above	2(g)
1	27.1.5	Aboriginal artefacts are situated a the floor of Lake Jasper. This means that power boats will have no more effect on these sites than swimmers, canoeists or windsurfers or even the wind	As above	2(g)
1	27.1.5	It was the result of a severe drought in April 1988 that the water level of Lake Jasper was lowered to expose shallow parts of the lakebed, revealing intact tree and blackboy stumps and dozens of prehistoric flaked stone artefacts. Prior to this no Aboriginal sites had been recorded around Lake Jasper. This was in spite of the recreational activities of the wider community including the use of powerboats, fishing, camping, canoeing etc	Noted, however sites has been damaged since discovery and use is increasing in the area	2(b), 2(e)
1	27.1.5	We understand that Aboriginal people negotiated with the Forest Products Commission to protect trees of significance in palmer block prior to harvesting of timber for perhaps the 3rd or 4th time. Surely CALM can work with the indigenous people to acknowledge and protect particular areas of significance while still allowing for water skiing in a portion of the largest freshwater lake in southern Australia	One site has already been damaged and Aboriginal people have requested that water skiing be prohibited	2(d), 2(e)
1	27.1.5	In speaking with a Noongar person I came away with the impression that mining would be more disruptive than water skiing	The approval to allow mining or not, is a separate issue	2(b), 2(c)
1	27.1.5	The level of dissatisfaction from local Aboriginal people regarding powered vessel use in relation to the submerged sites is not quantified or qualified. It is apparent that this has been reported from anecdotal evidence	As a follow up to the draft plan the Department met with the Walgenup Aboriginal Corporation on the 29 September 2005 and the native title claimants on the 24 November 2005. At both meetings the groups confirmed that their views were that powercraft on Lake Jasper is disrespectful and supported the prohibition of water skiing on the lake	1(e)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
3	27.1.5	It is not disrespectful to use powercraft on Lake Jasper, it is no different to powercraft use on any coastal estuary, or the Swan or Canning rivers given similar Aboriginal heritage	As above	2(e), 2(g)
1	27.1.5	Camping is more disrespectful of past Aboriginal use than powerboat use. If this objection was sustained, then the use of unpowered boats would be similarly offensive	The camping area will be relocated and nonpowered boats are less intrusive in terms of noise and physical impact on sites	2(e), 2(g)
1	27.1.5	Use of non-powered craft at the submerged Aboriginal sites in the Lake may well create a similar level of dissatisfaction with local Aboriginal people. Consequently the proposed prohibiting of powered vessels may not resolve the issue	If the use of nonpowered boats becomes an issue with the traditional custodians, then the Department will consider this issue at that point	2(d)
1	27.1.5	I have been able to speak with a senior Noongar of the Manjimup Shire (<i>name supplied</i>). She said she personally did not have any objections to the use of powerboats on Lake Jasper, however this matter should be discussed and agreement sought from the majority of the Noongar people of the south west before it could be stated absolutely whether or not the use of powerboats was deemed disrespectful	It is acknowledged that informal discussions may have taken place with local Aboriginal people. As you suggest, formal Departmental meetings as above confirm that the local Aboriginal corporation and native title claimants find powerboats disrespectful and wish for them to be prohibited from Lake Jasper. The person you mention was also at the native title meeting	2(a)
1	27.1.5	In my discussions with local Aboriginal people, it was never their intention to end powercraft use on Lake Jasper	As above we have had formal meetings to clarify this	2(g)
1	27.1.5	Check comments regarding disrespect with local Noongar Elders. I understand local Noongars support controlled skiing at Lake Jasper	As above	2(g)
1	27.1.5	We would like to live in harmony with the Aboriginal people and we are sure they would agree to the proper management of the site	Aboriginal groups interpret proper management as including prohibiting powercraft	2(g)
1	27.1.5	The plan should take into consideration all of the values of the area and conserve the significant values of the parks without discriminating between park users. All should be treated fairly and equitably	The plan does take into account the values of the area. Departmental policy is to treat visitors equitably and provide recreational opportunities in national parks that do not impact on the values. However, not all people can be pleased all the time, and as to be expected there are different recreational uses appropriate in different places. Thus there are certain recreational activities that are not appropriate in a national park, and not all national parks provide the same opportunities It is Government policy to involve traditional custodians in management and legislation to protect Aboriginal heritage sites	2(b), 2(d)
1	27.1.5	Significant areas such as Perth, Fremantle, Albany, Bunbury and Geraldton all have history shared by the explorers, pioneers, immigrants and indigenous people. No person should be discriminated against whether they be Aboriginal, Australian by birth, new immigrants or visitors	As above, some activities are not appropriate in a national park or compatible with the preservation of particular conservation or cultural values	2(c), 2(e)
1	27.1.5	The very nature of history is that there is change as is the case of the Aboriginal people and the geological changes to the Lake Jasper area	Lake Jasper is still a very significant site to Aboriginal people, this has not changed	2(g)
1	27.1.5	In the many years we have visited Lake Jasper, we have never met any Aboriginal people there	Noted, however the site is a registered Aboriginal heritage site and therefore requires protection under legislation	2(b)
1	27.1.5	With regards to waterskiing being identified as a potentially major degrading activity isn't it more that increased visitation and campers are more damaging?	Different recreational activities have different levels of impact. As stated powercraft pose a risk to water quality and conservation values of the lake Increased visitation will be managed by changing the site to a day use area only and relocating the camping area	2(d), 2(e), 2(g)
1	27.1.5	A report from the select committee of the legislative assembly on national parks advised that hang gliding on Lake Jasper should be permitted as it was deemed that for the last 50 years or so it was a dead or ghost lake that contained little life and no breeding grounds. Also the committee believed that no wash damage would be done to the shore	When was this report written? These statements are not supported by the listing of the lake as part of a wetland of national significance	2(g)
1	27.1.5	In view of the activity since European settlement, does the Aboriginal significance of the site and the listing of Lake Jasper as an important wetland justify closing the lake to powercraft?	Yes, all Aboriginal heritage sites and wetlands of national significance have been designated since, and despite European settlement	2(e)
1	27.1.5	Action 1 of rescinding the powercraft use area is long overdue and I heartily support this management measure	Noted	2(a)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
8+27	27.1.5	Agree with rescinding powercraft use on Lake Jasper for all the reasons given	Noted	2(a)
1	27.1.5	Protect Lake Jasper from motorised craft	Noted	2(a)
1	27.1.5	I fully support the banning of power boats on Lake Jasper which as well as ruining everyone's tranquil wilderness experience causes environmental damage and pollution	Noted	2(a)
913	27.1.5	Strongly support the banning of power boats from Lake Jasper to prevent pollution, both noise and water, which are incompatible with the concept of wilderness	Noted	2(a)
4	27.1.5	Support ending the use of power boats on Lake Jasper (this is environmentally damaging and an intrusion on other people's enjoyment of the park)	Noted	2(a)
1	27.1.5	Motor boat activity is incompatible with the conservation values and passive recreational values of the lake	Noted	2(a)
1	27.1.5	There are other water bodies of less significance where powercraft might operate	Noted	2(a)
1	27.1.5	Although the closure might cause problems with compliance and vandalism, the protection of Lake Jasper is an investment in biodiversity conservation that is not possible elsewhere	Noted	2(a)
1	27.1.5	Lake Jasper is too environmentally sensitive to allow powercraft use	Noted	2(a)
1	27.1.5	Lake Jasper is too fragile an area to allow motor boat activity. With the growth of the South West there is liable to be increasing pressure on the lake	Noted	2(a)
1	27.1.5	Powercraft and jetskis should be excluded from all waterbodies in the parks	Noted	2(a)
1	27.1.5	Rescinding the gazettal of Lake Jasper for power-craft use is supported, given this type of activity has numerous negative environmental impacts on this high conservation value area	Noted	2(a)
1	27.1.5	The purpose of a national park is for the most part preservation, therefore, public pressure which has been voiced to allow activities inconsistent with the objectives of a national reserve must be resisted. In the past, with lower visitation rates to these areas such activities may have been acceptable, however, now such activities risk degrading the natural values of the park. The desires of a vocal minority cannot be permitted to undermine the integrity of a national park	Noted	2(a)
1	27.1.5	Bearing in mind that Aboriginal people find the continued use of power-craft to be disrespectful to their culture and beliefs, and that the area might become a World Heritage Area during the life of this plan, I strongly support that power-craft activities at Lake Jasper and in national parks should be prohibited	Noted	2(a)
1	27.1.5	Strongly support the banning of powerboats from Lake Jasper to prevent both noise and water pollution	Noted	2(a)
1	27.1.5	More vigorous action must be taken to prevent powerboat use on Lake Jasper by displaying signs indicating fines for offenders and rewards for 'dobbing in'	Noted	2(a)
1	27.1.5	Controlled use of Lake Jasper should be allowed	Controlled use has not worked in the last 20 years. See comments above relating to submissions on the numerous reasons to prohibit powercraft	2(d), 2(e)
2	27.1.5	I object to the closure of Lake Jasper to power boats	Noted	2(e)
1	27.1.5	Power boats should be allowed on all existing places e.g. Broke & Irwin Inlet and Lake Jasper etc.	Only Lake Jasper is in this planning process and it is not deemed appropriate for powerboating to continue	2(c), 2(e)
1	27.1.5	Object to the proposal to ban water skiing from Lake Jasper, we believe most of the arguments presented are not valid or are exaggerated	Noted. See comments above relating to submissions on the numerous reasons to prohibit powercraft	2(e)
1	27.1.5	The justifications given for recommending the closing of Lake Jasper to powered vessels do not appear to be substantially researched and therefore no accurate data seems to be available to warrant such a decision at this stage. It is felt that further assessment is required to make a better informed decision	See comments above relating to submissions on the numerous reasons to prohibit powercraft, no further assessment is required	2(e)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	27.1.5	We support the retaining of Lake Jasper for recreation use (including powered water craft) and public access, requesting that appropriate management controls be implemented to better regulate use where issues are identified. That is to say that locking up the area and not managing it is the easiest, less expensive and most inappropriate way to control activities at the site	Noted, Lake Jasper will still be generally available as a day use site and for recreational activities, that is, it will not be locked up In the case of powercraft use, considering the conservation values, cultural values, risk of damage, management resources and ability to enforce regulations and remote setting of the area, the appropriate management control is to prohibit powercraft	2(e)
1	27.1.5	The provision of access roads and amenities to the park will increase numbers. No matter what the visitors' activities are, their very presence will impact up on the natural environment, and this needs to be managed in a manner to conserve all values without the precedent of locking away the parks	Agreed, the Department is not locking away the parks	2(d)
1	27.1.5	Lake Jasper is an important recreational site for local ski enthusiasts and the more so since water skiing was banned in Nornalup Inlet	Noted	2(d)
1	27.1.5	If powerboats were to be prohibited at Lake Jasper, this would create further congestion at other gazetted ski areas in the region during the summer months. The implications are that marine safety issues may arise from this congestion and shoreline degradation at other ski areas may increase	Noted, however see comments above relating to submissions on the numerous reasons to prohibit powercraft	2(c), 2(d)
1	27.1.5	We support the ongoing use of Lake Jasper for powercraft as it is an important recreational facility and there is a strong historical use of the lake by the community for this purpose	Noted, however this historical use is deemed no longer appropriate	2(d)
1	27.1.5	Support the continued community use of Lake Jasper for water skiing purposes. This area has a long history of use not only by nearby residents but also from other locations in both rural and metro areas	As above	2(d)
1	27.1.5	With regards to waterskiing on Lake Jasper, substantial use in the summer periods, especially over long weekends and school holidays brings finance (economic sustainability) into nearby towns	Noted, however see comments above relating to submissions on the numerous reasons to prohibit powercraft	2(d)
2	27.1.5	We object to Lake Jasper to be closed to powercraft use as use is only required for a short time: December to March and only on weekends	Noted, however these are also the busiest times for the park and activity does occur outside of these times	2(d), 2(g)
1	27.1.5	Access to Lake Jasper to enable power boats to operate for water skiing could be managed through restricted access months (i.e. December to March)	Impacts within whatever timeframe are not acceptable	2(d)
1	27.1.5	The draft acknowledges that vandalism, conflict between users and impacts on the environment are associated with surfing activities at Black Point, however the draft proposes a range of management options in co-operation with surfers. We recommend a similar approach to dealing with water skiing at Lake Jasper	Surfing is not strictly an activity within the park, the associated camping and day use is. These activities are to be managed in the same manner as at Lake Jasper, that is, the camping areas will be relocated to more sustainable locations	2(g)
1	27.1.5	We suggest local residents from shires of Manjimup and Nannup are able to get permits to use Lake Jasper for waterskiing and it is conditional on them to have proper conduct and maintain powerboats appropriately	This is not equitable	2(d), 2(e), 2(f)
4	27.1.5	There is a long history of powercraft use - since the early 1970s	As above, see comments above relating to submissions on the numerous reasons to prohibit powercraft This is still short in relation to the history of the lake The waterskiing experience has changed since the 1970s, there are more users	2(d), 2(e)
1	27.1.5	Waterskiing at Lake Jasper encourages physical participation in a family group (social sustainability) in a sport which is growing in popularity and is undertaken by people of all ages	Not everyone has a powerboat National parks are for nature-based recreation and are not supposed to replace sporting facilities There are other opportunities for family recreation at Lake Jasper such as picnicking, bushwalking and canoeing and there will be a nearby camping area	2(d), 2(e)
2	27.1.5	There is a push for family orientated sporting participation and it would be devastating for the many families that use Lake Jasper for waterskiing to be no longer able to enjoy this water activity as a family	As above	2(d), 2(e)
1	27.1.5	Life Be In It advertising has been thrown at us all the time and it is obvious through the increased users of the lake that people are spending more and more time as families getting together and enjoying a day at the lake "Being Active". There are not a lot of good areas around Manjimup that families can get together and spend good quality time as a family and get involved in sporting activities	As above	2(d), 2(e)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	27.1.5	My family use Lake Jasper to water ski and camp on a regular basis through the summer period. It is something that we all look forward to and helps keep a tight family unit	Noted, as above	2(d), 2(e)
1	27.1.5	Regarding water skiing, please do not be "spoil sports" and take away one of the very few places we can enjoy!!!!	As above	2(e), 2(g)
1	27.1.5	The closure of Lake Jasper to powerboats, we believe, is unnecessary and takes away another opportunity to partake in a leisure activity	As above	2(e)
1	27.1.5	Disagree with action to rescind powercraft area, we are only a small group that want to use Lake Jasper for waterskiing	Water skiing is an inappropriate activity in a national park that is valued for its remoteness and wilderness values and it is an activity that poses an unacceptable risk to the conservation and cultural values of the area	2(d), 2(e)
1	27.1.5	Boating is a recognised recreational activity, why are other recreational activities given preference? It is discrimination to rescind powercraft use	As above, not all recreational activities are allowable in all national parks	2(e), 2(g)
1	27.1.5	It is decimation to allow some forms of boating and not others on Lake Jasper	As above, some forms of boating are inappropriate	2(e), 2(g)
1	27.1.5	The plan should take into consideration all of the values of the area and conserve the significant values of the parks without discriminating between park users. Regardless of who has access to the parks, what their activities are, all should be treated fairly and equitably	As above, conserving the values requires management and control of certain activities	2(e), 2(g)
1	27.1.5	I find the points you use to justify the closure of Lake Jasper as the writers wish list and not corresponding with the thinking of the general public	As above, and there has been a lot of general public support for prohibiting powercraft on Lake Jasper as per the submissions received Also the Department is not 'closing' Lake Jasper	2(b), 2(d), 2(e), 2(g)
1	27.1.5	A motorboat allows for disabled use and those who are not well enough to enjoy the amenity of these water bodies	Noted, however this is not unique to powercraft	2(b), 2(d)
1	27.1.5	Support the preventing of jet ski access to Lake Jasper	Noted	2(a)
1	27.1.5	Jet skis should be excluded from all water bodies in the parks	Noted	2(a)
1	27.1.5	Does the wording of Action 2 with regards to other water bodies within the park mean that you are going to see how much you can get away with?	Jet-skis are already prohibited throughout the planning area, this action is continuing the prohibition, will clarify this in wording	1(e)
1	27.1.5	More vigorous action must be taken to prevent powerboat use on Lake Jasper by removing the boat ramp	It is proposed to remove the boat ramp	2(a)
1	27.1.5	With regards to Action 3 removing and rehabilitating the boat ramp at Lake Jasper, how will non-motorised craft get into the lake?	The majority of non-powered craft will still be able to use the lake without a boat ramp, the Department is not seeking to facilitate larger craft, there is not much current use and trailers are generally not suitable for the 4wd tracks within the parks	2(b)
1	27.1.5	With regards to Action 3, how will you get a disabled person into non-motorised craft?	Disabled people are able to join into many activities with and without assistance	2(b), 2(c)
1	27.1.5	We presume yachts are out of the question then if you remove the boat ramp?	Smaller craft do not need a boat ramp, and sailing on Lake Jasper is a very infrequent activity	2(b)
1	27.1.5	The nearest alternatives for locals are Lake Towerining at Moodiarup, and Molloy Island on the Blackwood	Noted, there is also Geographe Bay-Busselton, Bunbury Harbour, and Stockton open pit and Glen Mervyn Dam at Collie There is also the opportunity for a commercial operation in the south west to provide a water skiing venue	2(b), 2(d)
2	27.1.5	With regard to rescinding powercraft use on lake Jasper, there is no other facility of this nature in the lower south west	As above, and given the better road conditions, the travel times to sites such as Glen Mervyn Dam (a forest setting comparable to Lake Jasper) or Molloy Island would be similar	2(g)
1	27.1.5	I am convinced many families such as mine, hope the use of power boats on Lake Jasper will be allowed to continue. Lake Jasper is only area suitable for water activities to people in the Warren area	As above	2(g)
1	27.1.5	With regards to Action 4 of providing information on alternate boating areas, where are they?	As above	2(b)
1	27.1.5	There is no other water skiing resource of this kind for our community	As above	2(g)
1	27.1.5	To deny the populations of Nannup and Manjimup traditional water skiing access to Lake Jasper is biased against us in favour of those who can easily visit other areas of the State	As above	2(g)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	27.1.5	There are limited opportunities to find a sufficiently large waterbody to pursue our waterskiing that is a reasonable distance from our home and livelihood which demands our twice daily attendance in the dairy. To neglect milking apart from the economic consequence, would inflict unwarranted cruelty on the livestock which would not be acceptable to our society. We require a round trip no longer than 5 to 6 hours	As above	2(d)
1	27.1.5	The Walpole Wilderness Area and D'Entrecasteaux National Park represent almost half a million hectares of continuous national parks between Denmark and Augusta. All of the significant water bodies suitable for water sport and particularly water skiing are within conservation areas. If the draft is to be accepted then those who wish to pursue these sports will be excluded	As above	2(d), 2(g)
1	27.1.5	The closest alternative sites for skiing are quite a distance, too far for a young family towing a boat	As above, the travelling distances are comparable given the difficulty of access to Lake Jasper with a boat	2(d), 2(g)
1	27.1.5	Other venues for powercraft use are smaller and heavily populated so they are not as safe to use as Lake Jasper	It is presumed that the DPI would only designate "safe" powercraft areas	2(b), 2(c), 2(e)
1	27.1.5	We have tried water skiing at Windy Harbour and it is far too rough and dangerous	Noted, as above for other locations	2(b), 2(c), 2(e)
1	27.1.5	We find the wording of Action 5 to be ambiguous. Our interpretation is that there is no money to permit water skiing however it is ok to spend money on these other values and the impact of increased numbers of visitors will not be felt in the area	Other boating will be facilitated where appropriate as per the objective Financial resources will be directed towards manageable activities that do not impact on the conservation and cultural values of the parks	2(e)
1	27.1.5	CALM's Warren Region has a draft Paddling Management Strategy that aims to minimise risk associated with paddling activities by the provision of appropriate information and to a lesser extent, facilities	Noted, this will be incorporated where necessary	1(a), 1(e)
1	27.1.5	We do not find Action 6 to be a definitive statement. It seems that those who wish to water-ski within the parks can not	There will be no water skiing within the parks	2(g)
1	27.1.5	Action 7 seems to be specific to non-motorised water craft	This action is particularly relevant to non-motorised boating however information may also be provided for example, on water levels in Donnelly or Gardner River for power boats. The action will be clarified	1(e)
1	27.1.5	With regards to Action 8, will the prevailing conditions and speed limits and area of these water bodies permit water skiing without endangering life and interfering with commuter and tourist traffic?	This action only refers to power-boat use. Water skiing is only permitting in areas gazetted by the Department of Planning and Infrastructure. There are no such areas on Donnelly River or Gardner River	2(g)
1	27.1.5	Action 8 is ambiguous and will eventually lead to the use of powerboats for water skiing banned from all water bodies in national parks	The only waterbody gazetted for water skiing in the parks has been Lake Jasper. Other national parks are outside the scope of this management plan	2(c), 2(g)
1	27.1.5	Do powerboats use Gardner River?	There is some limited use on the lower reaches of the river. Low level of use due to the nature of the river and small area of navigable water	1(e)
1	27.1.5	The membership figures of KOCO are based on every small business in the Shire of Manjimup having \$2 membership tickets for sale	Noted	2(b)
1	27.1.5	There is a bias for the exclusion of recreational pursuits that involve a powerboat. The DMP has enough loopholes to exclude all powercraft from all national parks	Powerboats are more intrusive than some other recreational activities, and are deemed not appropriate in some areas. The DMP only applies to the Shannon and D'Entrecasteaux national parks	2(b), 2(e), 2(g)
1	27.1.5	We concede that Lake Jasper is an important water body in D'Entrecasteaux National Park but the arguments put forward in the draft focus on Lake Jasper and are seemingly less specific about Broke Inlet. We believe it inappropriate to concentrate all motor craft activities in one area alone such as Broke Inlet	Broke Inlet is not within the planning area. Broke Inlet is not within the boundaries of D'Entrecasteaux National Park and is not covered by the draft management plan. There are separate proposals to reserve Broke Inlet as a marine park. Boating in Broke Inlet would then be covered under that planning process	2(c)
1	27.1.5	Are you going to deny access for water skiing to Broke Inlet as well on the strength of the conservation values of Lake Jasper?	As above	2(c)
	27.1.6	Marroning and Fishing (see also 20.8)		
2	27.1.6	Inland fishing and coastal fishing should be separate sections so that issues are separated	There are not enough actions for beach fishing to warrant a spate section	2(d)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	27.1.6	I am opposed to the creation of any Marine Parks adjacent to the D'Entrecasteaux National Park, Black Point and Warren Beach. The recreational fisher would not be able to have an impact on the fish stocks in these waters because of the weather conditions. Wind and rough seas prevent recreational fishermen from fishing most days in the year. I have a house at Windy Harbour and stay for weeks at a time and on most occasions will only be able to go fishing two or three days over a two week period if at all. I believe the net fishermen should be banned because I have witnessed over a five day fishing trip 525 sharks being caught on top of this there was hundreds of scale fish caught, too many to count. This claim can be substantiated	Noted	2 (c)
1	27.1.6	The marron stocks in all rivers in the South West have declined over the last thirty years and I believe the decline has been partly due to the restocking of rivers with trout. Thirty years ago we did not have licences or marron seasons. The marron were plentiful. Now we have licences, reduced marron seasons and now reduced catches and the numbers still decline	Noted, the draft refers to trout as being a contributory factor	2(a)
1	27.1.6	...most marron populations have been overfished to the point where it is often difficult to catch specimens of legal size. Molony et al, 2003, state that the rainfall and environmental factors have more impact than marroning	Noted	2(a), 2(b)
2	27.1.6	The key points and strategies in the section are all supported	Noted	2(a)
2	27.1.6	Disappointed with CALM's ongoing and apparent deliberate lack of consideration for recreational fishing needs in their management planning processes. CALM's continuous lack of consideration for the social, cultural and economic importance of recreational fishing and marroning to the people of the south-west needs to be addressed	Fishing and marroning is allowed in most areas of the parks, subject to Fisheries regulations	2(c), 2(d)
1	27.1.6	The Shannon and D'Entrecasteaux National Parks Draft Management Plan contains proposals which are likely to impact on recreational freshwater fisheries activities	Noted	2(b)
1	27.1.6	We request to be consulted prior to the finalisation of CALM management plans that may affect or impact on recreational freshwater fishing activities	The draft management plans are the mechanism for consultation. The Department is part of the stakeholder discussion group for recreational fisheries	2(b), 2(d)
1	27.1.6	We have noted the often seemingly deliberate exclusion of all relevant stakeholders from the consultation process. We hope that the invitation that has been sent to CALM to attend the RFFSS meetings on a regular basis, will be taken up	As above	2(b), 2(c), 2(d)
1	27.1.6	P95. Last paragraph. I would say Doggerup Beach was accessible by foot. Salmon Beach is one of the few 2WD accessible beaches in the park, with a short walk from the car park to the beach	Noted	1(e)
1	27.1.6	p. 96. There are safety issues associated with great numbers of vehicles on a beach at one time	Noted but only occurs at peak times and is manageable	2(d)
1	27.1.6	The habitat in which fishing is carried out and access to those areas are of particular importance and we place the highest priority on preserving the future of recreational fishing and the resources it depends on	Noted	2(b)
2	27.1.6	The RFFSS is including a proposal to permanently close the Shannon River and its tributaries to Marron fishing on the basis that the Shannon River is considered to be one of the few remaining pristine riverine systems in the State's southwest corner	Noted	1(a)
2	27.1.6	Unlike most other river catchments in the southwest, the Shannon National Park provides a buffer zone that shields the river from agricultural and rural practices that may impact on water quality. Closing the entire river system would be in keeping with the conservation values of the Shannon National Park and would also provide the Department of Fisheries' research scientists with an area for assessing the impact of environmental factors such as climatic changes and variations of rainfall on marron populations in the absence of fishing pressure	Noted	1(a)
1	27.1.6	In 1990 the Shannon river was declared a 'snare-only' fishery to reduce the effects of high levels of fishing pressure. Due to its isolation and inaccessibility and the fact that the Shannon River is not suited to snare fishing, the take of marron from the river is not thought to be significant. We strongly support the proposal to close the Shannon River to marron fishing through the RFFSS committee and the Board of Reefishwest. If this proposal is supported it is likely to be implemented prior to the 2007 recreational marron season	Noted	1(a)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	27.1.6	The RFFSS will be releasing a discussion paper containing future options for the management of the recreational marron fishery in September 2005. The discussion paper will form the basis of a five-year management plan for the fishery	Noted	1(a)
1	27.1.6	No foreign species in particular trout, should be allowed to be introduced into the natural environment. Trout are voracious feeders and may dominate endemic species thereby leading to another expensive recovery plan	Noted	2(a)
1	27.1.6	Agree with prohibiting stocking of non native species within the parks and on all CALM estate for that matter	Noted	2(a), 2(c)
1	27.1.6	The stocking of our rivers with trout is another issue that should also be stopped. Trout are not native to this area but survive by eating fish and marron in rivers of the southwest	The introduction of trout to rivers is the responsibility of the Department of Fisheries and beyond the control of the department	2(a), 2(c)
1	27.1.6	Please stop restocking our rivers with introduced fish, its impacting on marron stocks	As above	2(c)
2	27.1.6	Supports the prohibition of introducing trout into all water bodies within the Parks	Noted, as above	2(a)
4+3	27.1.6	Fully support banning non-native species of fish and not stocking streams up-stream	Noted, as above	2(a), 2(c)
4	27.1.6	Trout has no place in a conservation reserve	Noted, as above	2(a)
1	27.1.6	Stop the trout restocking program altogether. The draft plan refers to the fact that trout released upstream cannot be prevented from moving down where the parks "contain the lower reaches of a major group of rivers" (p1). Therefore, trout should never be released	Noted, as above	2(a), 2(c)
1	27.1.6	The annual trout release program is encouraging recreational fishing of an exotic species, with its inevitable attacks on Western Australian native fish. Release of an exotic species makes a mockery of Western Shield and the feral pig education program and others	Noted, as above	2(a), 2(c)
1	27.1.6	It could be considered that ceasing trout stocking may hurt accommodation providers in the south west but from anecdotal evidence it is doubtful there will be much of an effect. CALM could be promoting the taste and availability of WA fish in order to keep the anglers in the region	Noted, as above	2(a), 2(c)
1	27.1.6	More tourists will come to experience an unspoilt natural environment than trout fishing at degraded streams	Noted, as above	2(a), 2(c)
1	27.1.6	I agree with not stocking the Shannon River as it is a 'pristine' river	Noted, Shannon River is not stocked	2(a)
1	27.1.6	Where possible all carp species should be banned. (the trout has bolted)	Noted	2(a)
1	27.1.6	Under the provisions of the Fish Resources Management Act 1994 the Department of Fisheries is responsible for the translocation of non-native fish species, including trout, within Western Australia. The Department of Fisheries is currently finalising a draft management plan for the translocation of trout into and within WA (Fisheries Management Paper 179). The translocation plan assesses the suitability of river systems within southwest catchment areas for trout stocking purposes based on environmental and social factors, native fish distribution and historical trout stocking events	This paper does not adequately recognise the environmental factors of rivers that flow through or into conservation lands	2(b), 2(d)
1	27.1.6	The Department of Fisheries believes that the Recreational Freshwater Fisheries Stakeholder Subcommittee (RFFSS) has sufficient representation from both recreational fishing and environmental representatives to make informed and responsible stocking decisions on a case-by-case basis. The Recreational Fishing Advisory Committee (RFAC) has also recently extended an invitation to CALM to nominate an officer for representation to the RFFSS. The RFFSS represents the most appropriate forum for the trout stocking concerns of CALM and the Conservation Commission to be discussed and hopefully resolved. I endorse that this opportunity be taken up	The Department took up the offer to be represented on this stakeholder subcommittee after the release of the draft management plan	2(b)
1	27.1.6	The recommendation to prevent re-stocking of trout in rivers upstream of the D'Entrecasteaux National Park is strongly opposed	Noted, the strategy is worded "seeking to prevent" as it is not our Department's role to prevent, it's the Department of Fisheries. It will be clarified that the Department is only making a recommendation based on conservation values that stocking non-native fish upstream of the national park ceases	1(e)
1	27.1.6	Stocking of trout like the introduction of non-native honeybees occurred decades ago	Trout is regularly restocked, as they usually do not have self sustaining populations	2(b), 2(g)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	27.1.6	The CCWA and CALM should not proceed with this recommendation affecting the Warren and Donnelly Rivers in the final management plan. The Shannon River is not stocked with trout, it can provide a benchmark ecosystem for native fish conservation into the future	The Warren and Donnelly rivers have high conservation value and they are within a National Park. Trout are thought to be responsible for impacting on the populations of native fish, frogs, aquatic snails, aquatic insects and crustaceans such as marron, koonacs and gilgies	2(c), 2(d), 2(e)
1	27.1.6	If the CCWA and CALM prevail with this unjustified and damaging proposal for the Warren and Donnelly Rivers, then the same unjustified rationale could be applied by them to the Blackwood, Collie and Murray Rivers which also run through conservation reserves	The Department will continue to work with the Department of Fisheries to obtain adequate conservation outcomes for all waterways in conservation reserves	2(b), 2(c), 2(e)
3	27.1.6	Other than the Warren and Donnelly rivers, no other south coast rivers are stocked with trout - Gardner, Deep, Frankland, Kent, Bow, Denmark, Hay, Sleeman, Kalgan - with the exception of King River at Albany	Noted	2(b), 2(c)
2	27.1.6	If the Warren and Donnelly catchments are not stocked that would mean the end of trout fishing south of the Blackwood, except in farm dams	Noted	2(b), 2(c)
1	27.1.6	The Warren and Donnelly rivers are the most important trout fishing rivers in Western Australia and hundreds of families visit the area each year to fish for trout stocked by the Fisheries Department funded by freshwater fishing licences	Noted, the plan points out that the benefit of the fishery has not been compared with implementing species recovery programs	2(b), 2(c), 2(d)
1	27.1.6	Freshwater fishing requires a licence, so it is in part self funding and it is regulated	As above	2(b), 2(c), 2(d)
1	27.1.6	The proposal to prevent restocking upstream is unjustified and damaging	The plan discusses impacts of trout in the introduced animal 20.8 and fishing 27.1.6 sections	2(d)
1	27.1.6	The only native fish large enough to fish is the freshwater cobbler and it is not a highly regarded recreational fish	This is stated in the plan	2(a), 2(b)
1	27.1.6	I strongly disagree with Action 3 as trout do not live long (3 years for rainbows and 5 years for brown) so if the need arose, (after research) they are easy to control. The only way to sustain a population is by stocking	Action 3 does refer to stocking for this reason, in order to control and eventually remove them from the rivers within conservation reserves	2(b), 2(c)
1	27.1.6	I strongly disagree with Action 3 if the main reason for keeping trout out of the parks is to protect native fish. On p 39 it states that the four priority fish (black-striped minnow, mud minnow, Balston's pygmy perch and the salamander fish) are not generally found in the Warren/Donnelly rivers but from Windy Harbour across to Walpole	Trout impact on many aquatic species, and the removal of trout in the Donnelly and Warren rivers may allow the recovery of species previous found there	2(d), 2(g)
1	27.1.6	Trout fishing is a tradition in the Pemberton area, going back to the 1930s. It should not be stopped unless research shows that trout are a direct threat to the freshwater environment	References for relevant research are provided in the draft management plan. Regardless of this, trout release should not occur unless it can be shown that they are not a threat to the natural environment. In areas of high conservation, the burden of proof should be with those wanting to introduce, or continue to introduce non-native species into the environment	2(d)
1	27.1.6	Trout predate on small redfin perch - removing trout from the Warren may increase the number of the more abundant and voracious perch	This should be investigated and control methods for perch should continue to be sought	2(d)
1	27.1.6	I rather think that the biggest problem is the introduction of perch trout into most streams. There is no closed season on these fish they hunt all year round	As the draft states, red-fin perch are no longer introduced	2(d)
2	27.1.6	Trout fishing contributes significantly to tourism in the Manjimup/Pemberton area	Noted	2(b), 2(c)
2	27.1.6	Given the marron fishing season is brief, trout fishing tourism is particularly important for tourist visits throughout the year, including during the cooler 'off season' months where regional accommodation struggles to make a viable income	Noted	2(b), 2(c)
1	27.1.6	If restocking upstream is prevented, it would lead to the end of trout fishing in the Warren and Donnelly Rivers and associated tourism, with no significant gain for conservation in these ecosystems. The substantial trout fishing tourism dollars would leave the Manjimup Shire and be spent in Tasmania, Victoria, New South Wales and New Zealand, at a time when tourism is vital for the local economy	We consider there would be a significant gain to the conservation value of these ecosystems and will continue to liaise with the Department of Fisheries regarding their stocking policy and the conservation outcome for these rivers	2(d), 2(e)
1	27.1.6	Trout fishing contributes to tourism in the Pemberton / Manjimup region and we are vitally concerned that the ceasing of trout stocking practices in the Warren and Donnelly Rivers could essentially end freshwater angling opportunities in many areas and have a significant economic impact on these vulnerable regional communities. We do not believe that due diligence has been paid to the effect that this part of the management plan will have on these communities	The Department makes its comments to the Department of Fisheries, it is up to the Department of Fisheries whether any changes are made	2(c)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	27.1.6	The question should be posed to the CCWA and CALM as to whether they also intend to somehow prohibit private trout stocking to the hundreds of private farm and tourism facility dams on tributaries of both the Warren and Donnelly Rivers? Trout escaping from these dams probably contribute substantially to the numbers of trout in the Warren and Donnelly Rivers and ultimately in the D'Entrecasteaux National Park. That is, do the CCWA and CALM also intend to close the King Trout Fishery, the Karri Valley Resort and similar tourism fisheries on tributaries of the Warren and Donnelly Rivers and all farm dam stockings for commercial and recreational purposes in these catchments?	As above	2(c)
1	27.1.6	Restocking of non-native fish (prohibition). This suggestion is impractical, impossible to police and should not be allowed e.g. streams all traverse national parks, farm dams etc	As above	2(c)
1	27.1.6	In excess of \$3 million per year are paid into the economies of towns such as Pemberton, Manjimup, Bridgetown and Nannup as a direct result of both Trout Angling and Marroning. This amount could be at risk under the proposed management plan	It should be kept in mind that, as the draft states on p77, Carlsen and Wood (2004) attributes \$62 million to the local economies between Manjimup and Walpole each year to nature-based activities, the natural environment and the attraction of tall forests. It can be assumed that the national parks in this area are directly responsible for contributing much of this. However, the value of the parks must be considered as a whole, not just for recreation and tourism but also for conservation, for the present and future generations	2(d)
1	27.1.6	The full ramifications of say the non-stocking of trout outside the park was not laid out. Local businesses should have been given the opportunity for compensation of decisions made by CALM affected their livelihood	As above	2(c), 2(d)
1	27.1.6	CALM must take a holistic approach and consider the effect of trout fishing on the surrounding local communities which, after the review of logging practices in the area, rely to a large degree on tourism dollars	As above	2(c), 2(d)
1	27.1.6	With approximately 17000 Freshwater licence holders (Trout & Marron) and the fact that the Manjimup-Pemberton area is the most popular freshwater fishing destination, the massive effect of a withdrawal or cessation of trout stocking in the area, would be catastrophic to many small businesses	As above	2(c), 2(d)
1	27.1.6	Figures quoted by the Western Australian Trout and Freshwater Angling Association show that their 200 members spend a minimum of \$300 per year in the Manjimup Shire. What therefore would be the impact of the 17,000 freshwater licence holders be. The total spending power of the freshwater licence group using the WATFAA average for expenditure in all freshwater fishing areas, not just Manjimup, would be \$5.1 million. Sure not all that would be spent in the local area, but surely a large part of that sum. To disenfranchise the local tourist industry by denying freshwater fishermen the fish stocks in the area, is surely something that should be considered. If CALM is willing to compensate all those businesses for the loss of their income due to the non appearance of freshwater anglers in their area, then let CALM say so in the draft management plan. The livelihoods of hundreds of people in the affected area must be considered. Local communities do not have many opportunities for having a decent livelihood and to deny them is criminal and inept on the part of the people who prepared this draft plan	As above	2(c), 2(d)
1	27.1.6	The research papers cited in the Draft Management Plan pay no recognition to the recreational and economic importance of trout fishing	As above	2(c), 2(d)
	27.1.7	Surfing and Swimming		
2	27.1.7	p96-97 Surfers as a group get singled out in this section as generally bad citizens. Experience confirms that the observations made in the DMP of the impact of this activity are, on the whole, valid. In practical terms the problems arise from vehicle access and use in the pursuit of surfing rather than an endemic malicious intent to damage the park or annoy other users. The situation is equivalent to the problems associated with recreational 4WD driving for its own sake. In both, the national park status of the land is simply irrelevant, possibly even a source of frustration to the users	Noted, paragraph 2 of this section notes that it is often the ancillary activities of the user group that have the larger impacts	2(a)
1	27.1.7	Camping at Black Point is also referenced to be relocated. By when??	Detailed site planning and consultation will take place over the next two to five years. This will determine the most suitable approach to camping at Black Point	2(h)
2	27.1.7	The key points and strategies in the section are all supported	Noted	2(a)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	27.1.7	p97 (strategy 7) - Should be careful about saying that we will supply hazard signs and info at surfing areas and warning about swimming risk issues. Don't want to say something that we may not achieve due to budget or due to large areas of coast line that can be accessed. Maybe you should be a bit broader with this section of actions	Noted	1(c)
	27.1.8	Sandboarding		
1	27.1.8	Sand boarding while numbers are low bring an appreciation of the bush to people more than in any other way. Their enthusiasm for the Australian bush is important for our environment to be nurtured in the future	Passive activities are more conducive and relate more directly to nature appreciation	2(e)
2	27.1.8	The key points and strategies in the section are all supported	Noted	2(a)
1	27.1.8	Sand boarding should be allowed in controlled areas	No, as the draft states the dune systems are too fragile within these parks	2(d), 2(e)
1	27.1.8	Until the number of visitors increases dramatically, is it not possible for youngsters to have the opportunity of sandboarding in a controlled area? A sign, with explanation, could indicate why sand boarding is closed all long weekends, including Christmas and Easter. It will be essential to print this on all CALM promotional material distributed widely outside the area to avoid unnecessary aggression directed at the Rangers	As above	2(d), 2(e)
	27.1.9	Abseiling and Rock Climbing		
2	27.1.9	Although abseiling and rock climbing are intrinsically different activities in terms of the skills and mental attitude required, and the practical levels of impact (and the plan would do well to recognise these) the key points and strategies are valid for the management of the parks. There are far better and more established sites for these activities outside these parks	Noted	2(d)
1	27.1.9	Opportunities should be available but as CALM suggests, only be enjoyed with an accredited tour operator. In addition, these sports are only to take place in selected areas chosen by CALM, and then only after an environmental study, including the presence or otherwise of endangered flora and fauna, has been undertaken	The process of licensing will be clarified	1(d)
1	27.1.9	Visitor numbers are comparatively low at the moment (other than long weekends). People should have the opportunity to experience the wilderness. There should be opportunities for elite activities as long as they are only with accredited tour operators in places firmly designated by CALM	As the draft states, there is an unacceptable impact on limestone cliffs and granite monadnocks in the parks, however licensed tour operators may be able to use abseil trees in appropriate locations	2(d)
1	27.1.9	Tourism WA has consulted several tourism operators in the area. An issue has been raised about the prohibition on abseiling and rock climbing in the national parks. A prohibition on commercially based rock climbing activities will limit the opportunity to develop adventure based tourism in the Pemberton/Donnelly area and force local operators to take visitors to the Margaret River area. Tourism WA would appreciate CALM's consideration of allowing rock climbing and abseiling at suitable granite rock faces in the Mt Chudalup area of D'Entrecasteaux National Park and several areas in the Shannon National Park, where impacts on native flora in those areas can be minimised through suitable licence conditions and management controls	As above. The conservation and indigenous heritage values at the granite monadnocks such as Mount Chudalup are very significant and can be seriously compromised by these activities. This activity is not consistent with the values of the parks	2(d)
1	27.1.9	The report indicates that some activities e.g. abseiling will not be available for 'public' use, however tour operators may still conduct commercial activities. The Department encourages CALM to re-consider this policy to allow for these activities on an organised, non-commercial basis-potentially on a permit system-so as to not disadvantage those who cannot afford to pay commercial fees	As above, the Department's licensing program allows for tighter control of these activities. However, there will still be no abseiling other than possibly abseil trees. The alternative is to prohibit abseiling all together. Not all recreational activities are catered for in all national parks	2(c), 2(d), 2(e)
1	27.1.9	Restriction to only commercial operators for abseiling precludes public enjoyment beyond an initial commercial experience	As above	2(c), 2(d), 2(e)
	27.1.10	Caving		
2	27.1.10	The key points and strategies in the section are all supported	Noted	2(a)
1	27.1.10	Visitor numbers are comparatively low at the moment (other than long weekends). People should have the opportunity to experience the wilderness. There should be opportunities for elite activities as long as they are only with accredited tour operators in places firmly designated by CALM	Action 1 of the draft allows registered speleological clubs or certified tour operators access	2(a)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	27.1.10	The report indicates that some activities e.g. caving will not be available for 'public' use, however tour operators may still conduct commercial activities. The Department encourages CALM to re-consider this policy to allow for these activities on an organised, non-commercial basis-potentially on a permit system-so as to not disadvantage those who cannot afford to pay commercial fees	The Department's licensing program allows for better management of these activities. The draft allows for speleological clubs (which are organised, non-commercial bodies) access to caves, not just commercial tour operators. However as the draft states, there is not much interest in caving in the parks and compared to other karst systems in other areas, the caves in D'Entrecasteaux National Park are small and shallow	2(c), 2(d), 2(e), 2(g)
1	27.1.10	Restriction to only commercial operators for caving precludes public enjoyment beyond an initial commercial experience	As above	2(c), 2(d), 2(g)
	27.1.11	Flying and Hang Gliding		
2	27.1.11	The key points and strategies in the section are all supported	Noted	2(a)
1	27.1.11	Overall we were pleased with the way hang gliding was dealt with in the plan	Noted	2(a)
1	27.1.11	Hang gliders have been flown at Salmon Beach since the 1970s. In the 1980s in consultation with Hand Gliders Association WA, CALM constructed a car park and an access path leading to the set-up/take-off area. The limestone surface of the takeoff provides a naturally safe and stable take off. Occasional trimming of encroaching vegetation might be required to keep the path and set up/take off clear	Noted	2(a)
1	27.1.11	Paragraph 4: <i>amend first sentence to read: "Due, in part, to the infrequency of hanggliding within the parks, the impacts of the activity have been limited"</i>	Agreed	1(e)
1	27.1.11	Paragraph 4: The final sentence reads: "Any increased demand for hangliding use of the parks would need an assessment of the potential impacts and safety concerns before a particular site developed for launching could be approved". A number of sites in the parks other than Salmon Beach and Cliffy Head have been identified by Western Australian hanglider and paraglider pilots as having been flown infrequently in the past. These are: Callcup Hill, Yeagerup Dunes, Mandalay Beach and Chudalup Hill. The numbers of pilots wishing to fly from these sites might be expected to increase slightly in the future as pilots relocate into South West towns and paragliding becomes more popular. The Albany Hangliding Club and Hangliding Association of WA are keen to work with CALM to develop and manage these sites to ensure protection of the parks' assets and users	Noted. Any use of the other sites described will require Departmental approval. Chudalup is not appropriate and would not be approved. The other sites in Donnelly District may receive one off approvals depending on the circumstances	2(b)
1	27.1.11	Action 4 says under 1500 metres however, page 100 says "under 610 metres for fixed wing aircraft and under 460 metres for helicopters" and PS No 62 says that the Department will request that pilots abide by the guidelines of 2000ft for fixed wing of 1500 feet for helicopters. This is commonly known to pilots as a "Fly Neighbourly" area. Currently these areas are in place at locations around Australia, Kalbarri being an example. Areas of high aircraft traffic (such as Purnululu National Park and Uluru) have procedures developed for safe and orderly aircraft movement, however, none of these propose 1500 metres. FYI you could check the current guidelines at http://www.airservicesaustralia.com/publications/current/ersa/GUID_ersa-fac-2-4_9-June-2005.pdf	Noted	1(e)
	27.1.12	Special Events		
2	27.1.12	The key points and strategies in the section are all supported	Noted	2(a)
	27.1.13	Non-commercial, Education and Not-for-Profit Activities		
2	27.1.13	The D'Entrecasteaux National Park especially, in particular the region south of West Cliff Point extending between the ocean around the west and south sides of Broke Inlet and on to Walpole-Nornalup National Park, provides a unique and outstanding opportunity for outdoor education based expeditions. The DMP notes the already high and increasing use of the park by such groups. No other area in the SW offers similar opportunities and challenges combined with the level of remoteness required to make the experience worthwhile. (The Fitzgerald NP offers similar challenges but the logistics are much more difficult and it lacks the opportunities afforded by Broke Inlet and the W-N NP)	Noted	2(b)
	27.2	Passive Recreational Use in the Parks		
2	27.2	<i>Change title to "Passive Recreation in the Parks"</i>	This title will no longer be used due to change in structure of this part	2(f)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	27.2	Educational, study and leisure (passive) groups should be encouraged - they should be versed in correct protocol in park	Noted	2(a)
	27.2.1	Scenic Driving		
2	27.2.1	The key points and strategies in the section are all supported	Noted	2(a)
	27.2.2	Day Use		
1	27.2.2	Windy Harbour - cliff facilities are great	Noted	2(a)
1	27.2.2	With the recent upgrade by CALM to the Pt D'Entrecasteaux, Salmon Beach and Cathedral Beach/Tookalup walk trails linking to the settlement, has seen a substantial increase in tourists to the Windy Harbour area, therefore impinging on the little amenities and services provided by the Shire of Manjimup and ratepayers	It has also enhanced the experiences available to the Shire's settlement. The Department provides toilet and picnic facilities at Tookalup and Salmon Beach (within the National Park) so visitors are not required to use Shire facilities at Windy Harbour	2(b), 2(c)
1	27.2.2	Additional indirect financial impacts to the Shire of Manjimup occur through CALM having no amenities, including ablutions/water, at Point D'Entrecasteaux and visitors are thereby required to use Shire facilities at Windy Harbour	As above	2(b), 2(c)
1	27.2.2	Relevant recommendation from Shire of Manjimup to DPI on the Draft Augusta Walpole Coastal Strategy includes: progressively improve facilities for day visitors at Windy Harbour in conjunction with the Windy Harbour community, CALM, other state government agencies and other stakeholders	As above	2(b), 2(c)
1	27.2.2	p104. Table 9. Lake Yeagerup should have a proposed Vista Point	Noted	1(e)
1	27.2.2	Table 9. O'Sullivan recreation site where Nelson Road crosses the Shannon River should be mentioned, it has a commemorative plaque	Noted	1(e)
1	27.2.2	Table 9. Twin Karris may become day use only as camping in the area has problems	Noted, currently to remain as low key vehicle camping. Currently within Quannup pastoral lease which will be indicated in Table 11	1(e)
1	27.2.2	Table 9. Mandalay Beach, Cliffy Head, Bottleneck Bay, Banksia Lookout and Launch Beach, Bald Rocks, Horseshoe Beach, Red Rock, Banksia Camp entry station and Lost Beach all exist	Noted	1(e)
1	27.2.2	Table 9. A Woolbales Lookout is proposed off Mandalay Beach Road	Noted	1(e)
2	27.2.2	The key points and strategies in the section are all supported	Noted	2(a)
1	27.2.2	Action 1, PI05. "Designing and developing day use sites..." I agree with this statement and again point out the need for access for the elderly, disabled and infirm, rather than 'park and walk' to lookouts etc	Noted, the Department consider access for all where it is appropriate and achievable. For example, universal access at the walk trail and look out platform at Point D'Entrecasteaux	2(a)
	27.3	Overnight Stays		
2	27.3	Any commercial facility and anything other than small, basic key camp grounds and built accommodation must not be located within the parks	This is in line with the draft plan.	2(a), 2(f)
8	27.3	The club is very appreciative of the camping and day use areas that CALM do supply	Noted	2(a)
	27.3.1	Built Accommodation		
2	27.3.1	The last proposal in Table 10, to consider providing basic shelter along a Lake Maringup to Mandalay Beach single track via the mouth of Broke Inlet needs a separate planning exercise also. This submission's previous comments proposing the Broke Special Area envisages a bushwalking expedition use of this area that does not follow the Bibbulmun Track 'bushwalking hwy' model on a built single track. This would only duplicate scenic opportunities available elsewhere on the south coast parts of the BT and compromise the potential of the area for more wild use. What is envisaged is exploration by small, self-reliant, self-contained groups of 8 persons or less travelling by their own reading of the landscape and prevailing conditions	The draft plan identifies in Table 8 the walking opportunity between Lake Maringup and Mandalay Beach as potentially class 4 to 6. Further detail will be the subject of normal Departmental recreational planning processes and guided by the visitor management settings allocated to the area, shown in the final plan. Therefore shelters (or lack thereof) will correspond to the level of walking opportunity eventually provided. The area is traversed by a four-wheel drive track for the most part, so wilderness opportunities are limited. The plan will clarify this	1(e)
1	27.3.1	PI06. Mention should be made of the fact that shelter and built accommodation is particularly required in this area because of the wetter and colder climate	Noted, however not a sufficient reason in itself to provide built accommodation. Shelters will be provided in suitable locations where appropriate for the activity and level of development, as per the draft plan	2(d)
2	27.3.1	The most basic facilities but particularly higher levels of built accommodation should not be provided without implementing management strategies to control the use and overcome problems associated with access. In the case of the Bibbulmun Track shelters, they are part of a managed facility that has been planned, is maintained and appears to function with few problems	Agreed	2(a)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	27.3.1	Table 10. Lake Jasper is mentioned in the text and not in the table, is this the site off Jangardup Road referred to as Cable Sands proposed addition? Huts in the Lake Jasper area are likely but not at Lake Jasper	Yes, agreed, text will be clarified	1(e)
1	27.3.1	Shannon Townsite and Lake Jasper are particularly appropriate for more developed accommodation and have 2WD access. In other areas less developed accommodation is more appropriate, such as already exists in the form of huts	Shannon Townsite is already developed, as above for Lake Jasper -- it is not considered appropriate for built accommodation, unless it is within the Cable Sands land swap (land vested in the Department's corporate body previously vested in the Executive Director)	2(a)
1	27.3.1	Table 10. There are huts as well as a lodge at Shannon	Noted, the draft refers to them as chalets	2(a)
1	27.3.1	Table 10. The inclusion of some huts and not others in this table is very confusing. If built accommodation is proposed for these existing hut sites in the long term, then just the site should be referred to, not the existing huts, e.g. Donnelly River Mouth, Gardner River Mouth and Coodamurru (the proposals for Coodamurru as I understand it are not only proposed for the hut area but in nearby areas)	Noted	1(e)
1	27.3.1	Table 10. Mottram's Hut is confusing when considered in the context of the unique agreements for that area, public access to the hut is unlikely for a while and Banksia Camp Hut is to be the public hut for that area for a while	The draft mentions Mottrams Hut area as being considered for redevelopment as opposed to being an existing site. The plan will clarify that Mottrams Hut is leased privately at the moment	1(e)
1	27.3.1	Table 10. There is an almost new hut at Banksia Camp	The table will be amended	1(e)
1	27.3.1	Table 10. New huts are proposed for Yeagerup Homestead / Inverrary Station area, there is already a draft site plan!	The table will be amended	1(e)
	27.3.2	Camping		
2	27.3.2	pp 108-109 Two separate sections are required here. A distinction needs to be drawn between camping in the vicinity of a vehicle and other camping, such as in the course of a bushwalk or canoe tour. Please rename this section Vehicle Based Camping and introduce a new section title Wild Camping	There will be a discussion of both types of camping	1(e)
2	27.3.2	Paragraph 3 on p 108 is particularly endorsed	Noted, the need for guidelines for education and not-for-profit groups is currently managed through the "not for profit" activity approval process and is mentioned in strategy 5 on page 103 of the draft plan	2(a)
2	27.3.2	Paragraph 4 on p 108 is particularly endorsed. There is an urgent need to address the impacts of uncontrolled camping in the park and formalise arrangements. Vehicle based camping should only be allowed in carefully planned and managed sites	Monitoring and management of the informal camp sites will be required to ensure park values are not compromised	1(d), 1(e)
1	27.3.2	Table 11. We don't need guidelines for managing camping groups, we need sites that can accommodate them	Through the more formal approval process now being used groups are directed to appropriate sites that can accommodate the activity	2(e)
1	27.3.2	Camping while numbers are low bring an appreciation of the bush to people more than in any other way. Their enthusiasm for the Australian bush is important for our environment to be nurtured in the future	Agreed, however numbers of people camping in the parks are not low, therefore management prescriptions are required to allow sustainable camping within the parks	2(a), 2(d)
1	27.3.2	All camp sites with no power supply you say generators degrade human values e.g. Gardner River, Broke Inlet etc. A load of rubbish	It is common practice in most formal campsites to restrict generator use before 7 am and after 9 pm. This is being actively promoted in brochures and site information to minimise impacts on other campers	2(e)
8	27.3.2	We agree with the 5 classes ranging from wild/beach camping to fully serviced campsites for large groups	Noted	2(a)
1	27.3.2	I strongly support the Commission's proposed objective to provide a range of quality camping opportunities in the parks whilst minimising environmental impacts and conflicts between users	Noted	2(a)
1	27.3.2	The objective to provide a range of quality camping opportunities in the parks is not adequately addressed for the Shannon National Park	Shannon Townsite provides a range of campsites from single tent to group camping, caravan and camper trailer sites to onsite "huts". More remote "walk in" camping is provided at Dog Pool as part of the Bibbulmun Track and remote vehicle based camping is provided in nearby D'Entrecasteaux NP	2(e), 2(g)
1	27.3.2	Action 1 p 110 "Providing a range of camping opportunities..." I agree with this and hope that the elderly and not-so-able are also catered for, as there seems to be a tendency to cater more for able bodied (hikers etc) in some parks"	As above	2(e), 2(g)
1+27	27.3.2	More campsites	It is not possible to cater for all demand in a single park. The Department has a wide range of camping opportunities available across the Warren Region	2(e)
8	27.3.2	We do request that the number of camp sites is not decreased - again to satisfy increased potential the demand for camping areas will increase	Noted	2(d)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	27.3.2	Have BBQ in popular camping areas with some sort of toilets	BBQs and toilets are provided where appropriate	2(d)
1	27.3.2	Put BBQ in all camping spots plus toilets of reasonable service for women	As above	2(d)
1	27.3.2	I totally disagree with special campsites, restriction of camping areas, or improving facilities in any way, e.g. Toilets, Carparks, Campsites etc	It is quite appropriate to have formal management arrangements in place to manage potential high impact activities such as camping	2(e)
1	27.3.2	Should we be upgrading campsites? - No, we are trying to get away from civilisation	Upgrading has to occur in some instances to protect the site from further degradation and to ensure the safety of park visitors. The Department provides a range of camping opportunities	2(d)
1	27.3.2	Table 11. In assessing existing huts, camping may be proposed around them	Where appropriate the location of existing squatters huts may be used for more formal camping opportunities, the plan will clarify this	1(e)
1	27.3.2	Table 11. Camps for equestrians?	This will be included in the discussion of possible horse riding opportunities at Shannon. There will be limited horse riding in D'Entrecasteaux NP so no specific campsites are proposed	1(e)
1	27.3.2	Agree for the provision of beach camping and should be confined to areas behind the foredune where sites are protected from wind and tides and where it is least likely to impact on the environment. Most campers are responsible in relation to other users, beach use and rubbish removal	Beach camping refers to camping on the beach. Once camping activity pushes into the fore dune it impacts on the fore dune, if it is well behind the fore dune, then it is informal and it depends on whether tracks are being formed, vegetation pushed back to whether this is also an issue. The plan does define what beach camping is (between high and low water mark) but it will now clarify what beach camping is not	1(e)
1	27.3.2	We agree with the provision of beach camping, however, we do not agree with conditions imposed. The requirement that "Beach camping is confined to the area between high and low water marks..." and "Camping can occur at any time in this area provided that it is safe to do so" is impractical and dangerous and amounts to an effective prohibition of beach camping. We believe it would be in breach of CALM's duty of care to encourage camping below high water mark. Beach camping should be confined to areas behind the fore dune where sites are protected from wind, are safe, and where it is likely to encourage erosion or blowouts	As above, camping behind the fore dune can cause unacceptable impacts, it would be better if a formal site was provided. Also the high water mark is not the same year round, so there are times when you can safely camp below the "high water mark" when the season is such that the actual high water mark is much lower. Appendix 12 in the final plan will clarify this	1(e)
8	27.3.2	Could the definition of "Beach Camping" be amended to include camping above the high water mark and behind the first dune system and be for a maximum of Two nights? The present definition of only camping between the high and low water marks and for over one night only is confusing as if camped in this area and the tide is 'high' during the course of the night - then safety is compromised?	As above	2(d), 2(e)
1	27.3.2	I propose that overnight coastal camping by small groups in undeveloped areas be supported and that the principles of "take out what you take in" or similar be heavily promoted	As above	2(d), 2(e)
1	27.3.2	Table 11. Which beaches are allowed to have beach camping on them ?	Those listed in Table 11 and marked on Map 12	2(b)
1	27.3.2	I request that actively managed camping areas be carefully chosen and minimised since it is obvious, from personal experience travelling north and remotely, that designated campsites are soon promoted and quickly become overused and under maintained	Noted	2(a), 2(d)
1	27.3.2	The management plan recommends relocating the camping areas surrounding Black Point to other areas to reduce impacts on Black Point. I have been a regular visitor to the Black Point area as a surfer and fisherman for more than 20 years. In that time I have seen the upgrading of the access road (WAPET road) to the west of the park, in conjunction with the encroaching farming land nearing the park boundaries. I would also agree that in that time I have seen significant degradation of the facilities, tracks and habitat surrounding Black Point. I am commenting that the recommended strategy of relocating the camping area will not solve the problem of negative impact on the area. My suggested solution would be to ban camping in the Black Point area and support / encourage the establishment of permanent camping area or caravan park at the Scott River farming area approximately 20min/20km west of Black Point	This comment is consistent with the Warren Blackwood Planning Strategy (WAPC 1997) but outside the scope of this plan. There will always be the desire for visitors to camp in the NPs. At peak times "off site" camping can help meet demand. More formal "off site" camping also suits a different type of visitor. People wanting to camp one or two nights while surfing or fishing will continue to want to use the NPs for this purpose. This activity is quite appropriate and consistent with the objectives of the MP	2(c), 2(e), 2(f)
1	27.3.2	Table 11. Twin Karris should change to day use	This will be determined by more detailed site planning once the area becomes NP. In the meantime camping will not be promoted by the Department at this location. The plan will clarify this	1(e)
1	27.3.2	Table 11. Lake Jasper as a site could be extended to Lake Jasper Area to give flexibility and enable relocation of Lake Jasper facilities if necessary for environmental and capacity reasons	The final will clarify that the campsite at Lake Jasper is to be relocated away from the lake. Detailed site planning will determine if it is desirable and / or practical to have a small number of "premium" campsites near the lake	1(e)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	27.3.2	A camp in the vicinity of Lake Jasper is now required as has been discussed with the District Manager, the text needs to be flexible enough to allow for that	As above	1(e)
2	27.3.2	The DMP proposes continued 4WD access to the Gardner River mouth. This is also available at the mouth of the Warren River, via Yeagerup Beach at least. Therefore the Donnelly River mouth provides an opportunity for a different, boat based camping experience in the D'Entrecasteaux Park. Access to the mouth could be restricted to approach by boat if this could be managed so that degradation of the estuary did not occur. Basic camping facilities such as toilets and some simple covered areas acting as communal shelters for meal preparation and group meeting places in wet weather could be provided in a well planned and managed area. This very low level of development would not preclude other future options and would be an acceptable interim or long term solution for this popular and scenic area	It is intended to maintain boat only access to Donnelly River mouth. Future camping opportunities at the mouth of the Donnelly will be considered as part of the detailed site planning of the area. The plan will clarify this	1(e)
1	27.3.2	Table 11. I don't think the Donnelly River Camp is such a good idea now that we have camps at Lake Yeagerup and Cary Brook	As above	2(e)
1	27.3.2	Many thousands of dollars have been spent this year on an elaborate building at Yeagerup Lake together with several camping sites. I consider the time is long overdue that some of this money was spent for the benefit of local people. One of the main recreational activities is going to the beach and fishing and sometimes staying overnight, at the present time there are no defined camping areas, no toilets and no barbecues or benches. You stated in this plan that during Easter 1999 there were 200 vehicles on the beach at Yeagerup. This is 6 years ago and a considerable amount of money would have been collected but none has been spent improving camping facilities	The camping facilities described at Lake Yeagerup are for visitors to the Yeagerup area. All fees collected are retained by the Department to assist in the conservation and management for the parks, including the improvement in visitor services and facilities. The draft plan outlines where existing and proposed camping and day use sites will be, as well as the level of development at each site. This will provide a range of camping opportunities across the parks	2(e), 2(g)
1	27.3.2	Table 11. Lake Yeagerup is not mentioned and I think now has significant camping facilities	Lake Yeagerup is not within planning area	2(c)
1	27.3.2	Sites such as the planned Oil Well Track Group 4WD Camp site should not proceed due to major dieback infestations which will result in its spread	Detailed site planning will be required before the development of camping opportunities in this area. The proposal is for the camping area to be near the old Inverary Homestead. Oilwell track is proposed to be a "permit only" area to minimise potential impacts. The final plan will clarify this	1(e)
1	27.3.2	Table 11. Oilwell track is proposed as permit only, shouldn't this be acknowledged here?	Yes the final plan will reflect this	1(e)
1	27.3.2	Table 11. Doggerup Area is suitable for wild camping as it's foot access, closing of Doggerup Track was very controversial, at least acknowledge the opportunity it now provides	The Doggerup area has a great deal of sensitivity in terms of Aboriginal heritage values and sensitive landforms	2(f)
1	27.3.2	Rubbish disposal at Gardner river should be set up	Park visitors are encourage to take out what they bring in. Rubbish disposal sites have the potential to impact on water quality, visual amenity and attract feral animals	2(d), 2(f)
2	27.3.2	Of the 33 camping areas listed on page 108- 109 only two- the Shannon Townsite and one other unspecified "remote natural area" with "no facilities" on the Shannon River - are not in the D'Entrecasteaux National Park	It is not possible to cater for all demand in a single park. The Department has a wide range of camping opportunities available across the Warren Region	2(d)
1	27.3.2	Table 11. What about camping opportunities around the Bib Track Huts and Munda Biddi Huts ?	Yes. These huts will be added to the table for camping areas	1(e)
2	27.3.2	In keeping with our Broke Special Area proposal, basic campsite development at West Broke Beach, Broke Inlet mouth, Coal Point and Broke South should not proceed until the planning for this valuable region is recognised	Any proposed campsite development will be preceded by detailed site planning to consider all issues associated with these sites	2(h)
1	27.3.2	Table 11. West Broke Beach area is proposed as permit only, shouldn't this be acknowledged here?	Final plan to reflect that this is a possible "permit entry" area	1(e)
1	27.3.2	We agree with the proposed camping sites in the plan with the exception that basic camping should be permitted at Broke Inlet on the access track to the north-west of the inlet	This road will become management access only	2(f)
1	27.3.2	Broke Inlet has always been an area of recreation both on and off the Inlet. While camping, water and toilet facilities need to be addressed in harmony with the surrounding environment. There is a need for people to be able to carry on their traditional recreation activities in the area and on the Inlet. The Warren area is an economically depressed area, therefore it is important for people in that area to be able to access a place that is within their financial ability	Broke Inlet is outside the planning area. Opportunities for recreation in the areas surrounding Broke Inlet remain virtually unchanged in the draft plan	2(a), 2(c)
1	27.3.2	Table 11. Camping on Islands in Broke Inlet ?	The Department will not be progressing any camping on the islands	2(d)
1	27.3.2	Table 11. Outward Bound Camps, South Broke and Long Point	South Broke is mentioned in Table 11 as Broke South, Long Point is in Walpole-Normalup National Park	2(c), 2(g)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	27.3.2	Table 11. Camfield Camping area	Not within planning area, but will be mentioned in text	1(e)
1	27.3.2	I understand that Lot 13224 at Camfield is designated "Department of Education Purposes" or similar. I have always envisioned that a facility could be established at that location by the Department of Education and Training, used as a nature-based educational camp for student groups. Once the shacks have been removed and a nature-based low-key camping ground established at Camfield, student groups from government schools could go there for excursions and ecology studies, just as private schools conduct annual camping excursions within the planning area at the Moores Track camping ground (which the plan should mention). For reasons of equity if a private school has use of a camping facility situated within the planning area (even if the camping ground should be on a leasehold property) then government schools should as well have a similar facility. The suggested lot 13224 facility could also be used to provide disadvantaged students with nature-based experiences or holiday stays. I suggest that lot 13224 should be shown on Map 4 of this plan as a tenure location	As above, Lot 13224 is not within the planning area. It is a Shire of Manjimup managed reserve. However Map 4 should show that Lot 11522 has been subdivided to produce 13224	1(e)
1	27.3.2	Table 11. Banksia Camp has quite a high level of facilities, its in the wrong VMS	Noted, however it is in the Recreation setting, the second highest setting	2(g)
1	27.3.2	Table 11. Mottram's Camp is not mentioned here ?	Mottram's Camp will be added	1(e)
1	27.3.2	Table 11. Long Point and Little Long Point are only available for sleeping in cars overnight, there's been a lot of feedback about these sites in the WWA process, they shouldn't be identified at camp sites	Long Point is outside the planning area. Little Long Point is no longer promoted as a camping site and will be deleted from Table 11	1(e)
1	27.3.2	Erosion and dieback issues should instigate the moving of camp/visitor sites away from the water's edge, high value and sensitive landforms such as Lake Jasper and be redeveloped similar to the Lake Yeagerup site i.e. vehicles and camp sites away from a site's focus points	This is the intent of the draft, the final will clarify this	1(e)
1	27.3.2	p110 (strategy 7). Charging fees for camping at all sites? Does this refer to designated sites such as Shannon, Jasper Lake etc or to all camping inc. beach camping? Needs clarification	Formal campsites only	1(e)
8	27.3.2	Camp fees - it is appreciated that "user pays" and when a camp area is 'serviced' or has infrastructure provided there would be an expectation of a fee structure, however the Club does advocate that informal or beach camping areas - which are unserviced do not carry a fee for use	As above	1(e)
2	27.3.2	Do not agree with camping fees for sites without facilities. This is consistent with the draft proposal, being no camping fees in wilderness areas	As above	1(e)
1	27.3.2	Further, the Commission should clearly promote its key performance indicators as the measure of acceptable disturbance (tactfully of course). Being aware that, say, evidence of littering or of removal of native vegetation for campfires will cause closure of areas for camping will assist with compliance	Noted. This will be communicated to visitors through Departmental on-ground management staff.	2(a)
	27.3.3	Campfires		
2	27.3.3	p110 Agree with all comments and strategies	Noted	2(a)
1	27.3.3	Remember to include in all CALM promotional material the encouragement to bring half drums, bricks and firewood if visitors wish to avail themselves of this facility. That under no circumstances can firewood be collected. Mention in the promotional material the Rangers will supply firewood but this cannot be guaranteed at busy times	Information on camping on beaches including appropriate use of campfires, not to collect firewood in the parks and rubbish removal is being included in all brochures as they are updated	2(b)
1	27.3.3	P111. Communication strategy needed about all campfire issues	This is a broader issue across the state and beyond the scope of this plan	2(c)
1	27.3.3	P111 (strategy 1). Need to be careful with suggesting that cut down drums and bricks etc are OK to bring into the park and use as fire rings. Suggest they need to be taken away as well. Do you want this type of rubbish brought into the parks? It also states that coals and fire waster are removed from the parks. Is this going to happen?	Amended to include removal of drums and bricks etc	1(e)
1	27.3.3	Campfires while numbers are low bring an appreciation of the bush to people more than in any other way. Their enthusiasm for the Australian bush is important for our environment to be nurtured in the future	Noted, however as the draft states, campfires are having a detrimental impact on the parks	2(d)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	27.3.3	We are in general agreement with much of the policy relating to campsites and campfires and firewood gathering as it relates to campers and four wheel drivers and heavily used areas in the summer. The policy does not make a lot of sense for small parties of backpackers who use minimum impact practices. We do not want fire rings at wild campsites. How do backpackers carry a fire bucket? How do backpackers remove their charcoal and ash from the park? Do backpackers in lightly used campsites really damage the bush by collecting firewood? Are they not simply slightly reducing the fire risk in the same manner that a deliberate 'prescribed burn' is doing? Does not a 'prescribed burn' create charcoal? We strongly support the development of a special code of conduct for bushwalking to address these issues and would be very happy to assist where we can	When wild camping or camping whilst bushwalking, a portable fuel stove could be carried. Firewood collection anywhere within the parks is prohibited, no campfires are permitted except in fire containers. Minimal impact techniques include these principles. For more information, the Department entered into a MOU with Leave No Trace Australia in 2005, http://www.naturebase.net/content/view/2092/770/ . See the Leave No Trace website for principles http://www.lnt.org.au/section01/01_09.html	2(d), 2(e), 2(f)
1	27.3.3	I propose that when coastal camping in small groups in undeveloped areas that we are able to take a drum and firewood to enhance the camping experience with minimal impact on the site	This is appropriate for beach camping only. Otherwise campfires can only be lit in fire rings or BBQs provided	2(d)
1	27.3.3	Bush riding (horse riding) has been our lifestyle all our lives. We like to go where there are no tourists. We take our own firewood. We are careful with fires. The only fires to get out of control have been when CALM has done protective burning. An excellent example, between the Frankland River and Lake Muir last summer	Campfires do have a detrimental impact on the parks. Campfires can only be lit in fire rings or BBQs provided.	2(d)
	27.3.4	Squatters Huts (see also 24 Non-indigenous Heritage)		
1	27.3.4	We believe that private provided facilities will gain more respect than CALM managed facilities	Management of these huts needs to be in accordance with the CALM Act, Government policy and Departmental guidelines.	
1	27.3.4	Life time leases for Donnelly River were granted in 1977 prior to the area being declared a national park. At CALM's request these lifetime leases were transferred to an annual lease arrangement. The term squatters as used in the draft plan is therefore very inaccurate, as hut owners have, ever since that time, paid annual fees to the Forests Department then later to CALM	As above	2(g)
1	27.3.4	Hut owners have had a keen interest in the surrounding environment and have helped CALM continually in many areas including: Arum Lily Surveys, Self management, Fire Management, Medical and other emergencies, Rubbish removal, Hut inspections, Voluntary services, Walk trail	As above	2(b)
1	27.3.4	Over the years we have brought our children up to look after the environment when bushwalking behind our cottages and also to pick up rubbish left behind by tourists on the beach, which is a problem when they leave all their rubbish scattered over the beach area	As above	2(b)
1	27.3.4	Now with our great care and knowledge to look after the fragile environment we have more peppermint trees and native vegetation than if left unattended as before	As above	2(b)
1	27.3.4	The committee has built and rebuilt the boat launching ramp 4 times without any state or local government financial or other assistance (except for this year). This has saved the state some \$50,000 to date. In addition, a jetty has been recently completed to service the needs of disabled and infirm members of the boating public (and some hut owners) who are using the river more and more. This has greatly increased safety for those people. The replacement value of the jetty is approximately \$45,000 (for a govt input of ~ \$6,000) the rest funded and constructed by hut owners	As above	2(b)
1	27.3.4	It is 85 years since the first settlement and use of the Donnelly River Mouth area began. Many of the families of the original settlers still retain an ownership of the very huts which their fathers or family groups established	As above	2(b)
1	27.3.4	We are part owners and users of a hut situated at the mouth of the Donnelly River. We respect the environment immediately surrounding our hut as we do to the whole river ecosystem. Maintenance on the hut is also a part of our activities, with a major upgrade on all external surfaces just completed. This was undertaken using a conservative approach to the environment with a view to blending in with the surrounds. We believe using these approaches is the only way to retain the usage of the hut. Our children are young yet cannot wait for their next trip to the Donnelly, unfortunately they may be the affected if this plan is implemented. We strongly believe in the retention of all the huts at the mouth of the Donnelly River	As above	2(d)
1	27.3.4	In many huts, several generations of families, their extended families and their friends have provided a fantastic opportunity for children to recreate in an outdoor	As above	2(d)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
		environment		
1	27.3.4	During our time down the Donnelly River we have taken visitors from all over the world and stayed for a week at a time and they enjoyed the beach, fishing and bushwalking which will not be possible to continue if we have to move	As above	2(d)
1	27.3.4	It seems a shame that through the eyes of jealousy those that don't want cottages where they are, don't want others to enjoy them as we cannot afford beach house where the powers that be and the rich can afford. Remember the cottagers on the river are working people that cannot afford to relax and fish anywhere else	As above	2(d)
1	27.3.4	p112. "...this has lead to serious erosion, fire hazards and river pollution." This has not been observed or recorded during hut inspections by the committee or CALM	As above	2(e), 2(g)
1	27.3.4	In regard to the uninformed, emotive and inaccurate statements pertaining to the Lower Donnelly River Settlement, I take umbrage. P112 "This has lead to serious erosion, fire hazards and river pollution". This has never been observed, commented upon or any action required as to any CALM inspections. You state earlier in the draft that the Donnelly River estuary is healthy and in the most natural condition in the South West (EPA 1989). That is still applicable today! Misleading context for LDR	As above	2(e), 2(g)
1	27.3.4	p112. "sewerage and household waste disposal systems are often primitive and can become serious health and pollution risks to the river and estuary". Again, not recorded during inspections	As above	2(f)
1	27.3.4	P112 "Sewerage and household waste disposal systems are often primitive and can become serious health and pollution risks to the river and estuary". Again, uninformed and emotive. As above, annual CALM inspections have never raised this as an issue. Since 1991 all plumbing was installed/modified in accordance with the bylaws and practices of the Country Towns Sewerage By-Laws and the Bacteriolytic Treatment of Sewerage and Disposal of Effluent and Liquid Waste Regulations. You state earlier in the draft that the Donnelly River estuary is healthy and in the most natural condition in the South West (EPA 1989). That is still applicable today! Misleading context for LDR	As above	2(e), 2(g)
1	27.3.4	p112. "Further, huts will deteriorate over time and pose a safety threat etc". Huts have been well maintained both as a result of owner pride and committee/CALM inspection outcomes over many years. Owners have continued to maintain them in good condition, even though the future may seem uncertain!	As above	2(g)
1	27.3.4	I would point out that it is not the hut-owners that disrespect the area rather the tourists who are encouraged to go there. They have no problem discarding their rubbish including plastic bags, cans and glass. They also have no problems in going to the toilet without either digging a hole or going off the main track in order to do so	As above	2(e), 2(g)
1	27.3.4	P112 "Further, huts will deteriorate over time and pose a safety threat etc.." Uninformed and emotive. It was CALM who wanted to be indemnified from any liability in this regard thus insisting that each hut was to be insured appropriately. Huts have been maintained to meet the insurance policy standards. Once again, CALM inspect every year and repairs are carried out if necessary every year. If you are performing these inspections properly, how can a state of disrepair or safety issue arise? Misleading context for LDR	As above	2(e), 2(g)
1	27.3.4	p112. "Hut owners can also be seen to have gained financially from the current situation etc". Since the mid 1970s when the area has become national park, we have always paid an annual rate, at a level that was set by the previous National Parks Board, then CALM!. Furthermore, we have assisted CALM in many, many ways, thus saving them financially, provided a ramp (which they and the general public have used for many years) and constructed a jetty and ramp at a very considerable cost saving to CALM and the government	As above	2(d)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	27.3.4	p112. "Hut owners can also be seen to have gained financially from the current situation etc". Uninformed and totally inaccurate. Annual fees and insurances have been paid since the early 70's both to the National Parks Board and CALM. Hut owners have provided boat-launching access, boat launching ramps and now a loading jetty for the public use free of charge. Many tens of thousands of dollars have been invested to the benefit of the general public and as a cost saving to government agencies. The personal cost for local assistance to the public in distress and government agency assistance has been borne by a sense of community of many, many occasions. CALM is one of those agencies as well as those agencies involved in emergency, medical, fire management, noxious weed control, feral animal control, customs (Coast Watch) and Law enforcement agencies. Misleading context for LDR	As above	2(d)
1	27	p122. "The huts have a prime position and create a visual and physical barrier to other users. This is clearly not equitable". The huts have been there, with government knowledge and approval for up to 85 years	As above	2(d)
1	27.3.4	P112. "The huts have a prime position and create a visual and physical barrier to other users. This is clearly not equitable". Totally inaccurate and emotive. The huts have been there with government knowledge, consent and sensible input for local management for over 80 years. This includes CALM since its inception to this present day. If a visual barrier, whatever that is, why does Tourism Western Australia mention these huts in more glowing terms? Misleading context for LDR	As above	2(d)
1	27.3.4	Thousands of people have had the opportunity, as guests of hut owners, to enjoy the magnificent scenery and ambience of this beautiful place. Most huts have a visitors book, which they are asked to sign, with many books going back dozens of years. This hospitality has allowed these guests to appreciate this area which they otherwise couldn't	As above	2(g)
1	27.3.4	The recreational and refuge value of the huts scattered throughout the park are also significant with evidence of high visitor use and acceptance (visitor books - for instance in the "Parmelia" (Wauchope and Faithful's) hut at the Gardner River moth. I have personally used this hut on a regular basis over the last 30 years, without ever having had any visitor comment adversely on the state of the building, its position or impact on the park's values. In fact, this hut has been "open" now for almost 50 years and to suggest it must now go simply does not recognise its value and current use	As above	2(d)
1	27.3.4	For the draft plan to say that the hut owners were precluding campers from using the area is patently incorrect	As above	2(g)
1	27.3.4	Government policy on huts is incorrect - Government Land Policy Document File Number 1109/1963, 2003/1965 Title: Illegal Occupation of Coastal Indiscriminate Squatter in Shires North of Perth (Coorow, Carnahmah, Irwin and Dandaragan) : (1) The Policy relates to unmanaged, unvested Crown land and unmanaged (unvested) reserves; (2) Historical huts should be preserved; (3) Huts should be retained at Donnelly, Camfield, Gardner and Warren	As above	2(e), 2(g)
1	27.3.4	Government policy, however (for the management and removal of squatters' huts on Crown land - Policy No. 12.5.01.1) relates only to "unmanaged (unvested) Crown land and unmanaged (unvested) reserves". In fact, the management team have chosen to "manage the squatters' huts in accordance with government policy". It does not relate or state how squatters huts should be managed on vested land or land which is the subject of a management plan. The reason for this omission is to allow a management team to assess the suitability, the need and the manner in which huts can successfully be allowed to remain and be used without compromising the value of the parks	As above	2(e), 2(g)
1	23.7.4	Since there is no requirement to conform to the government policy applying to areas outside the park, there is an opportunity for CALM to develop more creative solutions to this issue taking greater account of heritage and historical values in co-operation with the current owners	As above	2(d), 2(e)
1	27.3.4	There is no evidence produced by the management team to substantiate their statements that huts "impact on conservation values, aesthetic values, provide environmental health and safety risks". Admittedly there are a few huts throughout the park that should be removed i.e. at the Warren River mouth	As above	1(e)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
2	27.3.4	All the comments and strategies for this section are supported with the condition that any huts that may be identified for retention, modification or upgrading for heritage reasons or public use shall be subject to a thorough planning process and only after effective management controls are in place to manage access to such sites	As above	2(a)
1	27.3.4	We support the retention of huts where they have agreed heritage value, meet health/building requirements, are realistically and practically available to the broader community and are effectively managed (either by CALM or other operators)	As above	2(a)
1	27.3.4	We support the removal of huts in accordance with the State's Squatters Policy where they: do not have agreed heritage value; do not meet health and building requirements; and are not available to the general community	As above	2(a)
1	27.3.4	There are issues with the existing huts, as detailed in that section, but it is proposed that the 'hut experience' will be retained. Banksia Camp is an example of the appropriate retention of / provision for the 'hut experience'. We should acknowledge how special and Australian the 'hut experience' is	As above	1(a)
8	27.3.2	Requests that CALM retain all squatters huts	As above	2(e)
1	27.3.4	Huts should be allowed in controlled areas	As above	2(e)
1	27.3.4	I totally disagree with the removal of huts as they are doing no harm and are interesting in themselves (not that I have any interest in any hut)	As above	2(e)
1	27.3.4	Do I agree with removal of huts - No. In this report you are only handballing responsibility	As above	2(e)
1	27.3.4	The squatters' huts should be allowed to remain. My own children have been brought up on the coast. Mainly the Gardner and now we take our grandchildren there	As above	2(e)
1	27.3.4	I strongly support the removal of the shacks under the State's Squatters Policy and that the area be rehabilitated. A nature-based low-key camping ground similar to Crystal Springs should be established behind the ridge at Donnelly River, and not near the shoreline where the shacks are. The first shack near the main track should be retained and upgraded for use as a seasonal residence for a volunteer ranger and a camper's kitchen and meeting room	As above	2(e)
1	27.3.4	1. The previous management plan for the Parks allowed lifetime leases to the hut dwellers near the mouth of the Donnelly River. 2. The remaining huts were allowed to remain under their "current ownership" and management, providing they allowed some public occupancy of those huts. This was achieved by either leaving the huts open completely or alternatively "locking up" a private compound of the hut. 3. Subsequent to the gazettal of the plan, the Donnelly River hut owners negotiated occupancy licences which are still in force up to the time this management plan is gazetted. Both the above arrangements have served the hut owners and users of the park well and the preamble to the current prescriptions provide little evidence to support a radical change in the management of the squatters' huts	As above	2(e)
1	27.3.4	What is proposed for Donnelly River Mouth? Fully serviced Chalets or a Hut type experience? It's all very vague. A couple of serviced chalets are OK in Shannon or off Jangardup Rd (both 2WD access) but if a high level of development was provided at Donnelly River Mouth a unique opportunity would be lost. The "hut experience" is very special and should be preserved. If we're not careful we will have another Karri Valley or Broadwater there before we know it. The settlement should showcase sustainable living and the ingenuity of the original settlers and should still require considerable effort and commitment from visitors, not TVs, no satellite dishes, no mobile phone towers etc. Be positive about the wonderful opportunity that is there to have something really unique. Possibly a coastal Perup	As above	2(h)
1	27.3.4	Department needs to leave the Donnelly Huts, subject to the former draft, which was sufficient in form and in practice has been a success	As above	2(f)
1	27.3.4	The Donnelly is self managing self contained visitors come with hut owners all year round. Independent visitors too. Camping sites for visitors use paid for, just need improvements. "The Donnelly Huts belong to their owners" and are a credit to their owners. Manage the visitors not the residents	As above	2(f)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	27.3.4	If we are not allowed to keep our huts on the mouth of the Donnelly River then surely those with homes including high-rise apartments, holiday homes and multi-million dollar resorts etc along the coastline all around Australia should be made to remove theirs as they too would be stopping the coastline from returning to its natural state. Not all of us can afford these types of homes but do you see is picketing to have them removed? They would be far better off looking in their own backyards rather than trying to fix something that is not broken	As above	2(c), 2(f)
1	27.3.4	The Donnelly River mouth huts have been established for over 60 years and are marked on maps as a settlement. All the facilities at the river mouth huts and the boat landing ramp have been constructed at no cost to the taxpayer therefore the area could move to be a Townsite quite easily	As above	2(c)
2	27.3.4	The Donnelly River mouth situation needs a detailed planning exercise of its own, within the overall context of the parks. It is premature to make significant 'built' proposals for the area until the proposed new lease agreements, termination of tenure and eventual demolition arrangements are in place	As above	2(a)
1	27.3.4	Retain the huts at Fish Creek and beside the mouth of the Gardner River for the use of tourists	As above	2(e)
8	27.3.4	The club applauds CALM for retaining the huts and shelters mentioned on pages 106-107 and encourage CALM to retain them in the long term. However - would access to the huts be available if any of the proposed wilderness areas eventuate?? If any or all of the proposed wilderness areas are proclaimed then vehicle access will be totally banned - making several of the huts totally redundant?	As above	2(g)
1	27.3.4	KOCO does not support the blanket removal of all squatters' huts in the park. While removal is a simple solution and at face value conforms to the principle of equity and national park values, it is not in the spirit of the original commitment given when the park was declared. We also believe that inadequate attention has been given to the heritage value of the huts, their potential future value for visitor shelter and the unique situation of the Donnelly River settlement as the only settlement accessible only by water	As above	2(g)
2	27.3.4	Proposals to 'develop' some of the existing hut sites, which already experience high levels of vehicle activity and impacts, should only be done after it is determined that such a hut has historical significance with preserving (i.e. it was built and used by original stockmen and retains significant aspects of its original form) and that it is in fact, considering future use, in an environmentally acceptable location. Until this type of planning is complete it is premature to propose specific developments for existing huts	As above	2(a), 2(g)
1	27.3.4	I would like to comment on taking the huts away from Broke Inlet, as previously stated, I have been going to Broke Inlet for 30 years in that time myself and other residents of Broke Inlet have carried out many boats and canoe rescues that have overturned in the inlet due to calm conditions one moment then extremely rough the next. A recent rescue was carried out in March 2005, this was a 12ft dinghy with 4 people on board. That obviously had too much weight in the boat to travel to the mouth of Broke Inlet in rough conditions. Without us the local community having our huts there we would not be there to rescue people. Therefore more people will drown as this has happened some years ago when their boat overturned in rough conditions. Mr Hunter of Manjimup was found dead about 1 week later. Also the residents (hut owners) of Broke Inlet on occasions have reported illegal fishing boats and boats to coast watch some years ago. Us the community keep Broke Inlet clean and tidy after tourists leave their rubbish behind	Camfield is not in the planning area	2(c)
1	27.3.4	I strongly support the removal of the shacks under the State's Squatters Policy and that the area be rehabilitated. Remove the Broke Inlet shacks and establish a low-key camping ground	Noted, as above Camfield is not in the planning area	2(a), 2(c)
1	27.3.4	I don't believe this issue of hut removal has had sufficient community input or scrutiny, therefore, the management prescription should be in accordance with the terms of the outcomes from the original management plan, i.e. licences at the Donnelly River and huts remaining open throughout the park. A special task force or committee should be immediately convened to fully investigate and provide recommendations to CALM for the next management plan	Management of these huts needs to be in accordance with the CALM Act, Government policy and Departmental guidelines.	2(d)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	27.3.4	The hut owners should be given a further option following the 6 year lease to extend the lease if they comply with the regulations to be set out	As above.	2(d)
1	27.3.4	If the 6 year leases are not extended and CALM wishes to take over some of the huts for visitor shelter then the owners should be compensated by CALM	As above.	2(f)
1	27.3.4	Persons with huts in the parks should only be charged a nominal fee where there is an isolated hut and not large groups, as I'm sure amenities would not be provided for a single hut	As above.	2(f)
1	27.3.4	In the case of the Donnelly River Huts the plan already proposes to remove them. Although most of the existing huts are squatter huts erected during the 1960s-70s the site's non-indigenous heritage dates mainly from 1920s with some late 19th century association with pastoral leases. The huts form a precinct that is unique in several ways, including its form of access, the strength of the riverine community and how well it has been cared for. A preliminary review of coastal hut locations on the lower west coast shows that most sites have been developed and re-developed into formal camping and caravan parks, and or townsites and in other areas, cleared of squatters. Shire officers from Dandaragan and Gingin to Augusta confirm my observation	As above.	2(e), 2(g)
1	27.3.4	My first comment is a concern that the Donnelly huts are not being seen as the heritage jewel that they are and that a Plan commitment to remove them within six years of its approval fails to apply the strategy outlined. I have no vested interests in any of the huts	As above.	2(e), 2(g)
1	27.3.4	Once the Yeagerup Block is confirmed a national park only, a public organisation e.g. KOCO could become guardians of the Bolinghup Hut. Restoration as a first aid post or emergency shelter for busy walkers and explorers	Yeagarup block is already within D'Entrecasteaux National Park, it is however part of a candidate wilderness area. As the draft states, Bolghinup Hut has heritage value and a draft conservation plan has been prepared. At this stage there are no plans to facilitate public access to the hut. Management access will be retained to allow conservation works to be carried out on the hut as required	2(e)
1	27.3.4	Fish Creek Hut. Fish Creek Hut has been standing for approximately 43 years. This hut has been continually maintained by one of the original builders, his son and friends who frequent this hut. Fish Creek Hut has been open to the public for refuge for all these years with the exception of a couple of rooms which have been locked to store owners personal fishing gear. We along with many other individuals believe this hut to be of heritage value and would like to see it classified as Heritage value. Extensive money, labor and time has been spent maintaining this hut by these people and will continue to be in the future for all park users	Management of these huts needs to be in accordance with the CALM Act, Government policy and Departmental guidelines.	2(d), 2(e)
	28	Commercial Tour Operators		
1	28	Do not support the use of National Parks for commercial activities, including horse riding	Noted, however commercial opportunities can provide a wider range of sustainable recreational opportunities and activities that can be effectively managed through licence conditions	2(d), 2(e), 2(f)
1	28	From a commercial point of view it is not equitable that only one tourist operator should enjoy the privilege of being licensed for horse-riding activities. I suggest that at the time the currently licensed operator ceases to renew his licence, no new licence should be issued to anyone. This would mean that the current operator should not have the right to sell his licence to anyone or transfer his horse-riding business to a member of his family. Conditions to this effect should be negotiated with the operator. Fade out licensed horse-riding activities in national parks	The single licence was issued following an advertised expression of interest. Licences are currently not transferable. The draft plan considered the issue of horse riding and it was determined that since horse riding had historically taken place in the NPs, with suitable management controls in place this was an acceptable activity. It was considered that a single CTO was the most practicable way of effectively managing the activity	2(d)
8	28	Reduce or ban activities within the parks to "free" public usage when commercial tour operators can still conduct these activities - this is promoting an elitist clientele and is discriminating against those who cannot afford / do not wish to use commercial operations	As discussed under the activities in question, it is a management tool to reduce impact by using operators that are controlled by their licences that have a strong incentive to abide by the conditions of their licence. The alternative in many cases would be to prohibit the activity all together	2(d)
2	28	pp 114-115 Any proposals to establish built accommodation (particularly at a level that would be commercially viable) or facilities that would degrade the natural landscapes and wilderness values are opposed. The DMP makes much of the combination of the impressive natural landscapes and remoteness of D'Entrecasteaux. Significant developments therefore can only be considered near the inland perimeters of the parks, or preferably, in adjacent towns. Given that neither park is particularly extensive in vehicle travel terms between already established townsites, it is hard to imagine significant built accommodation development other than at the old Shannon townsite	Noted, the most appropriate locations would include the Donnelly River settlement, other areas currently containing or previously containing built accommodation and Shannon Townsite. This includes previous and current grazing lease areas. Detailed site planning will be required prior to any development. The plan will clarify this situation in this section	1(e)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	28	The terms of licences associated with tourism accreditation have changed slightly due to some changes in the accreditation programs	Noted	1(e)
1	28	P114. Better feedback from CTOs on user numbers and patterns of use would facilitate better communication and provision of facilities	Noted	2(c), 2(f)
	29	Visitor Safety		
2	29	Strategy 4 needs qualification. The proliferation of warning signs in natural areas is an unnecessary eyesore. We are rapidly heading to an absurd endpoint where nothing will be able to be considered safe unless there is a sign saying so, because the alternative, warning users of all hazards that may not be obvious, would require a forest of signs over the entire landscape. An alternative to this must be found and it should be limited to general warnings at perimeter access points only, such as already exist in some places	The Department has a duty of care to park visitors to ensure there is a reasonable level of information at key sites to ensure visitors are well informed of the risks at particular locations within the NPs. This is achieved through a range of strategies including general "off site" information such as on NatureBase and in brochures, information at key entry points into the park and specific information at various sites within the park. The location of site specific information takes into account a range of factors including visual amenity	2(a), 2(d)
1	29	Consideration of a remote phone network in close proximity to Black Point would be seen as a significant asset in improving safety and dealing with emergency situations in light of the history of fatalities associated with the recreational use of Black Point. It is suggested that an appropriate communication system be recommended for inclusion into the management plan to cater for increasing visitation, which may result in an increase in emergency situations. It may also be useful to detail frequency of ranger visits within the management plan, to the various popular public access areas to ensure appropriate monitoring of the condition of access tracks, stranded or abandoned vehicles and other potential emergencies that lead to injury or death within the parks	As above, detailed staff works programs are not appropriate information to include in the management plan. Visitors are encouraged to obtain up to date information before visiting the park via NatureBase, park brochures and contact with local Departmental offices	2(c), 2(d), 2(f)
1	29	Providing appropriate information to ensure visitors can make an informed decision about whether to undertake an activity or not should be mentioned	This is strategy 4	2(a)
2	29	<i>Action 6. Protocols for visitors on what to do and where to go if caught in a wildfire in the parks.</i> This issue should have been addressed a long time ago and practical solutions should be available to park staff and visitors, today. This issue is not included in the performance criteria. This is a significant oversight and must be included in the management plan	Noted. This information is included in some publications such as Bibbulmun Track maps. It will also be included in future updates of park specific information on NatureBase and brochures such as "Going to the coast in D'Entrecasteaux National Park". Strategy 6 will be amended to reflect this	1(e)
2	29	Strategy 7: The parks are already adequately covered by existing means of communications in the use of radio and satellite telephones. Any proposal to provide general communication coverage to the public via a mobile telephone network for example that requires development within the park is strongly opposed. The notion that help is readily available through such communication will result in visitors embarking on activities in the park without appropriate preparation and equipment. In addition the availability of mobile phone coverage could significantly impact the experience in camping, as it does in the built environment already	Noted. These points are addressed in section 36 of the draft plan. The intention of Strategy 7 is to investigate improved emergency communication for and between emergency services agencies when dealing with emergencies in the parks. This will be clarified in the final plan	1(e)
1	29	p.116 Registration Issue should be discussed here	The Department currently does not have a uniform visitor registration system in place. There is no intention to have a general visitor registration system in the parks. This issue is a state wide issue for the Department that is beyond the scope of this plan	2(c)
1	29	Discouraging inappropriate advertising of areas, e.g. photos of people set on cliff edges, rugged 4WD driving	Agreed	1(d)
1	29	Developing communication strategies for communicating visitor risk issues	Covered in strategies in the draft	2(d)
1	29	A Ministerial Taskforce Review of Adventure Tourism Visitor Safety to recommend any administrative or legislative changes considered necessary or desirable to improve visitor safety for adventure tourism in Western Australia has been committed to. The Review will assess current licensing and accreditation requirements for this industry sector and mechanisms that will foster enhanced adventure tourism safety standards	Noted	2(b)
	30	Domestic Animals		
1	30	The only known area of beach within the D'Entrecasteaux National Park for dogs to be exercised is confined within areas of the Windy Harbour reserve. Dogs within national parks are viewed by CALM officers to be of more concern than feral animals including pigs, foxes etc. At the public meeting held in Pemberton recently, CALM officers could not offer a plausible explanation why dogs cannot be permitted to be taken through national parks and onto beaches, being an expected and much sought after recreational activity for 'man and dog'	The draft states six reasons why dogs should not be taken into national parks, action 3 of the draft also proposed designated a dog area east of windy harbour	2(g)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	30	The beaches within the D'Entrecasteaux National Park are so extensive and at times isolated that dogs do not impinge on the serenity of other park users. Regular fox baiting programs in the area also provides adequate reason for owners to keep their dogs under control or leashed, preventing them from straying	As above	2(d), 2(e), 2(f)
1	30	Domestic dogs are capable of predating on native fauna, however with appropriate management and education of park users this risk could be reduced to an extremely low level	The draft states several reasons why dogs should not be taken into national parks, training of a dog would not successfully alleviate the issues	2(d), 2(e), 2(f)
1	30	p117, para 3. Prey on, not predate on	Noted	1(e)
1	30	p117, para 3. Surely there are wild dogs and feral cats in the Park already?	Section 20 discusses the introduced and other problem animals in the parks. The presence of feral cats and wild dogs in itself is insufficient reason to allow people to bring domestic animals and pets into the parks	2(d)
1	30	'The plan states that 'the lasting scent of dogs can scare native fauna away'. This statement is not immediately logical and should be backed by some scientific evidence that this is indeed the case. There is no reason to suppose that fauna would be any more disturbed by the scent of dogs than any other species, nor is there any reason to suggest 'dog scent' is any more long lasting than any other species. There would also be a compelling argument that native fauna in this area would be highly adapted to the presence of human and canine scents, given that the landscape encompassed by the parks reputedly supported relatively high densities of Aboriginal and presumably, dingo populations	The scent of any predator will impact on native fauna movement. Dogs normally mark out territory and this scent is relatively long lasting and can have a significant impact on native fauna movement through an area	2(d)
1	30	Dogs are often suggested as a significant disease vector for wildlife and zoonotic diseases. The actual disease threats are not specified and again are not backed by any substantial scientific data. The zoonotic potential of a dog faeces in public areas is substantially overstated and has been shown to be of minimal public health significance even in high exposure situations such as urban parks. Certainly there is a greater risk to public health posed by the indiscriminate and inappropriate defecation by humans in intensively used areas within national parks and other public open spaces that are highly prized for their conservation and scenic values	Noted. Both are of concern to park managers	2(d)
1	30	The disease of greatest significance carried by dogs is cysticercosis caused by infection with hydatids. Control of hydatid tapeworm is readily achieved and with education of park users, any risks (already low) could be substantially reduced if not eliminated	Dogs and other domestic animals are not permitted in the parks other than proposed at Windy Harbour. Education of dog owners on this issue is beyond the scope of this management plan	2(c), 2(e), 2(f)
1	30	Another canine disease of concern to wildlife in the parks is the possibility of distemper virus infecting pinnipeds (seals and sea lions) in Australian waters. Canine distemper virus has been recorded as causing significant mortalities to several species of pinnipeds throughout the world in recent decades. In reality, this risk is incredibly low, distemper virus is virtually eliminated in domestic dog populations in Australia. Combine this with the low population and limited distribution of pinnipeds within the parks, and the infrequency that they could come into contact with viable virus from an infected dog, such a species crossover of disease is virtually implausible. Further, there is no evidence that canine distemper virus has spread directly to pinnipeds through environmental exposure in other recorded outbreaks and as many species can carry canine distemper virus, including humans, there is no direct causal link between domestic dogs and incidents of canine distemper in pinnipeds	Noted but dogs and other domestic animals are not permitted in the parks other than proposed at Windy Harbour	2(c), 2(e), 2(f)
1	30	Other diseases such as gastro-intestinal worms, leptospirosis, tuberculosis, toxoplasmosis etc are sometimes put forward as potential disease risks posed by domestic dogs to wildlife. Closer examination of the pathogenesis and epidemiology of these diseases indicate that domestic dogs pose no significant threat to wildlife in terms of disease transmission	Noted but dogs and other domestic animals are not permitted in the parks other than proposed at Windy Harbour	2(c), 2(e), 2(f)
1	30	The management plan contends that there are potential conflicts with other park users caused by dogs in national parks. Visitors bringing dogs into the park to beaches is a frequent occurrence in the parks. This clearly prohibited activity is well tolerated by most park visitors to these same areas, indicating that the level of tolerance and support by park visitors generally is very high. Any potential conflicts posed by the presence of dogs in 'designated areas' could be largely resolved by engaging interested parties and stakeholders to find equitable solutions	Advice from park management staff indicates that the number of people breaching CALM Act Regulations by bring dogs into the park has reduced significantly over the last decade. Park staff have taken appropriate action when encountering people with dogs within the parks. This has generally been in the form of a request / instruction to leave the park. There has been no general acceptance of or tolerance to dogs being taken into the parks	2(e), 2(g)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	30	The management plan indicates 1080 baiting as a potential issue if dogs were allowed in certain areas of the park. In reality, 1080 baiting programs would encourage park users with dogs to comply with restrictions such as 'designated areas', and acceptable restraint requirements. Furthermore, any dogs that escape into the park are highly likely to be baited before any feral dog population could establish	Noted but dogs and other domestic animals are not permitted in the parks and the Department would prefer to avoid domestic dogs being poisoned by accidental ingestion and death from fox bait	2(d), 2(e), 2(f)
1	30	This submission strongly endorses the need for reasonable access and recreational opportunities for dog owners within the parks	There is reasonable access for dog owners, however not dogs themselves. The purpose of national parks is not to provide recreational opportunities for dogs and the objective of this section reflects this	2(d), 2(e), 2(f)
1	30	There is a significant and genuine recreational need for access for dogs to some areas within the parks. In particular, access to beaches where dogs can be allowed to run freely, swim and interact with owners in a natural manner. This would be considered an iconic and highly desirable recreational activity by the vast majority of Australians	Noted. This activity is not consistent with the park values and therefore dogs are not permitted in the parks. However, Action 3 proposes the Department investigate the feasibility of designating an area for dogs east of Windy Harbour	2(d), 2(e), 2(f)
1	30	Approximately 40% of 6.2 million households in Australia own a dog. In WA there are approximately 367,000 (2002 survey data) domestic dogs. More than half of households that do not own a pet, rate pet ownership as highly desirable and of these, 80% would prefer a dog. The population of domestic dogs, relative to the human population is expected to remain static or grow slightly. Dog owners represent a majority within the community and most would rate reasonable access to beaches for dogs as a legitimate recreational need	As above	2(d), 2(e), 2(f)
1	30	The only public access currently available for the general community are small areas of local council designated beaches. These are near to towns and major population centres and as a result, have pressure from high frequency of use and the multiple recreational needs of the community confined to small areas. In contrast, CALM effectively prohibits access for dog owners to the vast majority of coastline from Cape Naturaliste to beyond Albany through its domination of coastal oriented national parks	As above	2(d), 2(e), 2(f)
1+4	30	We support the banning of domestic animals within the parks	Noted	2(a)
1+27	30	No Dogs	Noted, however the Department will investigate the feasibility of one designated area adjacent to an area where dogs are already allowed in the Shire reserve of Windy Harbour	2(a), 2(d)
1	30	Prohibition of domestic animals (cats, dogs, horses) from national parks is supported. This is a major issue throughout the State, particularly with reference to dogs, and is an emotive issue with the community. Dogs compromise the integrity of national parks and complicate management programs, particularly fox baiting. Horses can potentially accelerate the spread of weeds and degradation of trails in the national park	Noted	2(a)
1	30	Pet dogs should be allowed onto some of the beaches which are used purely as fishing spots so long as they are well behaved and controlled	For the reasons outlined in the draft plan, dogs will not be permitted	2(d), 2(e)
1	30	Dog beaches should be made available so people do not have to leave pets home as there are no kennels readily available near all towns. These should be beaches primarily used for fishing not swimming beaches	As above. Your issue is noted, however, there are several kennels in this region, and people with all manner of pets also have this issue	2(c), 2(d), 2(e)
1	30	Dogs should be allowed in the Park on a leash or within/on a vehicle. We have private property within the Park and are continuously harassed in regards to transporting our dog to private property-when in actual fact the dog is not in the park causing damage to flora and fauna	Dogs on leashes still cause conflict, and impact on the environment. The access to your property should not be within the park tenure, however you should contact the District Manager at Pemberton to discuss further	2(c), 2(d), 2(e), 2(f), 2(g)
1	30	By continuing to prohibit access to dogs, without reasonable consideration will inevitably result in the continued practice of many visitors bringing dogs into the park against regulations. This places many visitors and park managers in conflict and substantially contributes to the prevalent disenchantment of many regular users with the current management plan	There has been reasonable consideration, it is a State-wide policy, support by legislation. Infringements will be used to enforce the prohibition and this should deter dog owners bringing dogs into the national parks in the medium to long-term. Also advice from park management staff indicates that the number of people breaching CALM Act Regulations by bring dogs into the park has reduced significantly over the last decade	2(e)
1	30	Opposition to dogs in national parks borders on paranoia to the extent that dogs are seen as a greater threat than pigs (p52) and is especially curious given the ready control of any stray dogs that is afforded by regular fox baiting	Noted but dogs and other domestic animals are not permitted in the parks and the Department would prefer to avoid domestic dogs being poisoned by accidental ingestion and death from fox bait	2(e)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	30	While this submission does not support access to the parks for cats, as there is no legitimate recreational need to do so, it also recognises, relative to the impact of established feral cat populations throughout Australia, domesticated cats would in reality have an inconsequential additive effect of native fauna populations. This is particularly so given survey data indicate approximately 90% of domestic cats are desexed in Australia	Noted	2(c), 2(f)
1	30	The family pet dog should also be permitted to go to the beach. I know it is said that they could escape and become feral but we now have towns (which have dogs and cats) surrounded by national parks. We have national parks with wild pigs, horses, goats and deer in them. At least, with baiting programs taking place, domestic dogs would not survive long in the wild	It is not policy to allow dogs in national parks except in designated areas, which would be exceptions rather standard practice, and as above for response for accepting that domestic dogs could be controlled by baiting	2(d), 2(e), 2(f)
1	30	Certainly activities such as pig hunting with dogs should be prohibited within parks and in any case, would unequivocally contravene the Animal Welfare Act of WA	Noted	2(a)
2	30	There should be no extension of the dog exercise area along the beach towards the Gardner River mouth at Windy Harbour. Even if the beach may not all technically be national park it is effectively and should be managed as such. Allowing this extension would send the wrong message, firstly by bowing to local public pressure to permit an inappropriate use of the park and secondly in that it will make the enforcement of rules for the rest of the park more difficult given there is already a significant problem with people bringing domestic pets into the parks	Action 3 recognises the demand for this activity and identifies an area where the impacts will be minimal being adjacent to an existing dog exercise area that has no physical separation from the National Park. If dogs are prohibited from the Shire reserve in the future however, the plan will be amended to add that the designated dog area within the NP will also be removed	1(a)
1	30	The plan makes reference to provision within CALM regulations that will allow 'designated areas' within national parks for dog exercise areas and discusses, without detail, time-frame or a clear policy, the possibility of an area east of Windy Harbour being designated as a 'dog exercise area'	It would be one of the actions to be progressed after the gazettal of the final management plan, however it would not necessarily be a dog exercise area (where a dog can be unleashed)	2(b)
1	30	This management plan does not adequately consider the genuine recreational needs of the community and by its own admission that visitors with dogs to the parks is a frequent occurrence, does not have the resources or ability to enforce the prohibition of dogs in national parks. Furthermore, the management plan highlights the existing mechanism within CALM regulations for 'designated areas' for dogs, provided the recreation and conservation values of the park can be accommodated	The management plan has considered the recreational needs, however it is unable to fulfill all the needs of every person. The Department does has the power to enforce the prohibition of dogs in national parks and they will only be allowed in designated areas. In this plan, there is only one designated area proposed and it is deemed that it is the only area where the conservation and recreational values of the parks will not be impacted too greatly. If there is an impact on these values, then the designation can be removed	2(d), 2(e), 2(f)
1	30	This submission recommends that the management plan: (1) Recognises the legitimate recreational needs of a large section of the community that seeks recreational opportunities on beaches with their dogs. (2) Engages with interested parties and stakeholders that can accommodate some of these recreational needs. (3) Develop a management plan that includes some access for users with dogs that will fulfill these needs while preserving conservation and other values	This activity is not consistent with the park values and therefore dogs are not permitted in the parks. However, Action 3 proposes the Department investigate the feasibility of designating an area for dogs east of Windy Harbour	2(d), 2(e), 2(f)
1	30	Beach recreation with dogs is a valid and much sought-after activity. Residents of the Shire of Manjimup are all but denied this activity because despite having the longest coastline in the south-west, all of it is accessed through national park. The only section of coast that is available is a small area within the Shire controlled boundaries of Windy Harbour. National Park control of almost all of the coastline between Cape Naturaliste and Albany provides few opportunities further afield	As above	2(d), 2(e), 2(f)
1	30	Examples of strategies that may allow recreational users with dogs within the parks, while maintaining conservation and other values: (1) Several 'dog-friendly' beaches are designated within the parks (These would be primarily long beaches, particularly where vehicle access to the beach is permitted, and might include dog access in one direction from access points so users can choose a 'dog beach' or not); (2) Dogs may run loose on beaches, provided owners retain some control. Dogs must remain restrained at all other times within the parks' boundaries; (3) Dogs are allowed under a permit system (registered with a council and individually identified by council tag or microchip or by a CALM 'permit' tag); (4) Dogs identified as causing harm to wildlife or posing a threat to other users should have permit revoked; (5) CALM staff adopts a pro-active educational role with park users to maximise compliance with regulations with reference to dogs in national parks	As above	2(d), 2(e), 2(f)
1	30	The great length of coastline in the D'Entrecasteaux National Park provides ample opportunity for dog access to beaches without an adverse impact on other users. Regular baiting provides ample incentive for owners to prevent their dogs from straying	As above, and again the Department would prefer to avoid domestic dogs being poisoned by accidental ingestion and death from fox bait	2(d), 2(e), 2(f)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
		Part F		
2	Part F	On reading the heading for this Part, one might be forgiven for overlooking the fact that the subject of this DMP is national park. National parks are one class of the very small area of our land mass which has been set aside in perpetuity to be preserved, with human use only to occur if this does not disturb or harm the long-term preservation of this natural environment	The section is included in the management plan to provide management strategies to protect the national parks for the reasons you outline	2(f)
2	Part F	The term sustainable is used widely in general English and its interpretation varies. Some regard sustainable to mean that the resource will not exhaust during their lifetime, clearly not the meaning required for national parks. In this DMP context our interpretation is that the resource will never be diminished and certainly not exhausted. This means that only resources which are being continually renewed might be considered for use within a national park, provided there are no secondary effects on other park values or resources	The word sustainable has been removed	1(e)
2	Part F	Subject to strict environmental guidelines and areas used returned to their natural state	Agreed	2(a)
1	Part F	This one is not in the plan and comes under the Shire's responsibility but it needs pressure from you. Why oh why is there still a open hole at the Windy Harbour tip where people throw all sorts of pollutants in. I know they will say it's the cost but it seems strange that they can ship all their stuff from other tips but not from the one that is slap bang in the middle of an environmental hot spot	Not in the scope of the management plan	2(c)
	31	Traditional Hunting and Gathering		
1	31	I would suggest that indigenous peoples be permitted to hunt and gather in the Parks, using traditional implements. It would not be appropriate, for example, to allow any person with a gun into the parks, unless that person was suitably trained to use a gun without posing a risk to other people	The draft states that one of the conditions would be that the activity does not impinge on the safety of others	2(d)
2	31	Agree that Aboriginal people be allowed to collect traditional foods within the parks where it can be shown to be sustainable and does not pose a threat to the safety of others	Noted	2(a)
1	31	Gathering of natural foods by the Aboriginal people should only be allowed if they use the traditional methods for hunting and gathering food e.g. boomerangs, digging sticks and spears	Noted, however the plan reflects the current legislation that permits Aboriginal people to hunt for food on lands and waters managed by the Department	2(c), 2(f)
1	31	Key Points Box, first point. Traditional burning has been instrumental both in traditional hunting, in promoting the production and facilitating the gathering of species that have been used traditionally for food by indigenous inhabitants. To deny the right to traditional burning is to deny the right to traditional hunting and gathering	Traditional burning will not be permitted in these parks to facilitate hunting	2(d), 2(f)
	32	Mining		
1	32	Should be Mineral and Petroleum Exploration and Development. <i>Include Petroleum in title</i>	Mining encompasses these meanings, the footnote will be amended to include petroleum	1(e)
2	32	All the mining tenements and petroleum exploration licences [page 121] are in the D'Entrecasteaux National Park. This section of the draft plan is irrelevant to the Shannon National Park	Noted	2(b)
1	32	Although DOIR administers the Mining and Petroleum Acts that allow for the grant of titles, the Minister for the Environment has powers of concurrence to these activities and both Houses of Parliament have to support the granting of Mining Leases in the Parks. <i>Refer to the Minister for the Environment having power of concurrence over mineral and petroleum resource activities in the parks and to Parliament having to approve Mining Leases</i>	The draft plan makes statements already to this effect	2(a)
1	32	Given that much of the park will be wilderness or surrounding wilderness, I strongly oppose mining	Noted. However as the draft plan states while the State Government's policy is to prohibit mineral and petroleum exploration and development in national parks and the Conservation Commission seeks to oppose any mining activity that may affect the values of the parks, mining can still be undertaken under the Mining Act subject to various approvals. Also mining is allowed in 5(1)(g) reserves, one of which is within the planning area	2(c), 2(f)
1	32	The Shannon and D'Entrecasteaux National Parks require statutory safeguards to secure their protection, particularly from mining	As above	2(c), 2(f)
1	18	Exploration, mining and petroleum/gas production should be prohibited from the MPA as it is inappropriate land use	As above	2(c), 2(f)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1+4	32	I would like to see no mining and mineral exploration in the parks or in any area excised from them	As above	2(c), 2(f)
1	32	There should be no mineral exploration in the parks	As above	2(c), 2(f)
2	32	Strongly opposed to mining or mineral exploration in the park	As above	2(c), 2(f)
2	32	The definition of mining includes prospecting, exploration and mining and quarrying and these should all be banned too since all these activities can cause irreversible damage to the environment	As above	2(c), 2(f)
2	32	Mining should be banned in national parks because roads and infrastructure to access mining areas cause direct damage and also increase the chances of disease spreading	As above	2(c), 2(f)
2	32	Mining should be banned in national parks because chemicals used in the extraction or that are spilt, and the exhausted flumes can poison flora and fauna and potentially spread to other areas, especially through the wetland systems	As above	2(c), 2(f)
1+27	32	I recommend that the Shannon and D'Entrecasteaux National Parks should be protected at all costs from mining and exploration for mining. It is a particularly sensitive area, a home to many endemic plants that are found nowhere else in the world. It was originally considered to be unsuitable for farming as has been illustrated by the Scott River area, which has needed great additions of fertilisers and water to produce pasture/crops after it was released for farming in relative recent times	As above	2(c), 2(f)
1+27	32	I am opposed to mining in the management planning area for the Shannon and D'Entrecasteaux National Parks area as described by the Draft Management Plan (including the 5g reserve) as it is an inappropriate land use	As above	2(c), 2(f)
1+27	32	Exploration, mining, mining access activities and petroleum/gas production should be prohibited from the Management Planning Area	As above	2(c), 2(f)
2	32	Mining in any form must not occur in the parks and the mineral sands and lime mining occurring or planned within or near the parks must cease immediately as its not sustainable. The actual mining process reduces the natural capital of the park which is an integral part of the environment and relied on by other parts of the ecology	As above	2(c), 2(f)
1+8	32	I recommend exclusion of any further exploration activities in the park	As above	2(c), 2(f)
1	32	Mining to be disallowed completely. It cannot coexist with National Parks - it disrupts biodiversity and creates visual pollution	As above	2(c), 2(f)
1	32	Petrol and gas are not sustainable therefore ban the mining either. Times have changed, especially climate change. The draft plan refers to "a possible increase in species extinction" and also refers to CALM's discovery that some "habitats are suitable for re-introduction" like the noisy scrub-bird (P15 & P45)	As above	2(c), 2(f)
1	32	It is a long time since the following Acts were made (30 to 40 years ago). Since the land is vested in the CCWA, this Department should move to have the Petroleum Act 1967 and the Mining Act 1978 made null and void, or alternatively ensure that the CALM Act overrides them	As above	2(c), 2(f)
1+27	32	This park is of international significance and must be managed accordingly. Mining should be banned	As above	2(c), 2(f)
1	32	No mining/mineral exploration	As above	2(c), 2(f)
1	32	It is a totally inappropriate landuse to allow any mining in the Management Planning area for the Shannon and D'Entrecasteaux National Parks as described in the Management Plan (including the reserve) I am totally opposed to any mining	As above	2(c), 2(f)
1	32	All mining activities should be banned and exploration should be banned in the Management Planning Area. This should cover petroleum and gas production	As above	2(c), 2(f)
1	32	Mining is clearly identified as a threat to a number of its values	As above	2(c), 2(f)
	32.1	Mineral Resources and Prospectivity		
4+27	32.1	The 'Cable Sands' Section 5(g) reserve should immediately be re-vested as national park and no additional mining allowed to proceed	As above	2(c), 2(f)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	32.1	It has been a matter of ongoing concern that Lake Jasper has been under threat from a proposal to mine the excised portion of the D'Entrecasteaux National Park. In particular, the fact that Lake Jasper consists of a perched water table overlying potential acid sulphate soils indicates that any proposal to disturb the area runs a high risk of irreparable hydrological and ecological damage. I would recommend that the area excised (referred to area 5(g) in the DMP) be returned to the Park and that no further mining proposal of this nature be entertained	As above. Any mining proposals will be subject to an Environmental Review and Management Programme (prepared by the proponent and EPA) and requires Ministerial approval	2(c), 2(f)
1+27	32.1	Mining should be excluded from Jangardup South area because the conservation and heritage values of this area are so important	As above	2(c), 2(f)
2+27	32.1	The Conservation Commission of Western Australia should request the Minister for State Development (formerly the Minister for Mines) to invoke Section 267(a) of the Mining Act to exclude mining in Jangardup South because the conservation and heritage values of this area are so important	As above	2(c), 2(f)
1+27	32.1	The proposed Jangardup South mineral mine would require huge quantities of groundwater and the impact on surrounding ecosystems might be disastrous. The harm would result from water table drawdown with associated water stress in ecologies and acidification of soils and water due to aeration	As above	2(c), 2(f)
2	32.1	The Jangardup South sand mine must not be allowed to take the huge amounts of water these mines use elsewhere in the state	As above	2(c), 2(f)
1	32.1	Mining in the acid sulphate soils in this area could have disastrous consequences e.g. Beenup, Jangardup South mine could be another disaster	As above	2(c), 2(f)
1	32.1	The history of acid sulphate soils in this area and the disastrous consequences which flow from the disturbance of these soils must be uppermost in the mind of any consideration of mining in this area. Jangardup Mine would be a case in point	As above	2(c), 2(f)
1	32.1	No mining in the Management Planning Area for the Shannon and D'Entrecasteaux National Parks as described in the Management Plan (including 5g reserve). The Conservation Commission of WA should request that the Minister for State Development invoke Section 267(a) of the Mining Act to exclude mining in Jangardup South	As above	2(c), 2(f)
1	32.1	The Jasper wetland system...near pristine... let's not risk it by mining etc!!!	As above	2(c), 2(f)
1	32.1	Read "Endemic Disjunct and Relictual Flora" p 41. Lake Jasper stars again, but for how long?	As above	2(f)
1	32.1	The Cable Sands mining lease should be resolved as soon as possible, in order to allow the entire Lake Jasper region to be included in the Walpole Wilderness Area and eventually in the Walpole World Heritage Area	As above. D'Entrecasteaux National Park is not proposed to be added to the Walpole Wilderness Area	2(c), 2(f)
1	32.1	Lime quarrying is an inappropriate land use and should be discontinued	The quarry is operating under the provisions of the former Mining Act 1904. The Department does not have the legislative power to discontinue this, however is seeking for the Department of Industry of Resources to resolve the matter	2(c), 2(f)
1	32.1	I note with concern that with regard to mining and exploration, "The objective is to minimise the impact of exploration and resource extraction within and adjacent to the parks on values of the parks" (p122). I note that the Cable Sands Jangardup mine has already allegedly produced significant effects on the Jasper-Gingilup wetlands system. Water drawdown from pit pumping has led to the decline of nearby forests. Fauna living adjacent to the mine are subject to pollution in the forms of dust, noise, lights at night, radioactivity from tailings, and soil vibration. As such, the Jangardup mine presents an example of poor management of park values. The damage being done to the area surrounding Jangardup is such that many observers have become cynical of CALM's ability to manage National Parks effectively	The plan reflects the current legislation and Government policy. The District is not aware of any of the issues raised. Annual reporting by the company on their compliance with environmental conditions does not reflect the comments made	2(e)
1	32.1	In the mining section it is stated that "Part of the northern portion of the 5 (g) reserve has been mined as part of the Jangardup mining activities and has since been rehabilitated" (p120). It is my understanding that the landscape that has been mined in no way resembles the landscape before mining. Although rehabilitation has been attempted, it has proven almost impossible to produce a healthy floral community that could be considered comparable to the adjacent conservation reserves	A small section of the 5 (g) reserve has been mined and rehabilitated [approximately 2.6 hectares - would need to confirm accuracy of this estimate from aerial photo]. The remainder of the mining activity is within private property NL 12895 and Central Block - State Forest [with the majority of the activity within the private property]. The success of the rehabilitation is being monitored and the company is required to rehabilitate to the standards contained in their approval. This information can be obtained from Department of Industry and Resources	2(c), 2(f)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	32.1	Last paragraph, p7, Is Cable Sands planning to plant the 700-800 species per km2 after mining the 5 (1) (g) reserve or the 1083 Ha land parcel for conservation purposes? How are they going to prevent acid run-off from the soils they bring up to the surface?	Providing details of how mining activities are to be undertaken are outside the scope of this plan. However, if mining is approved it will be subject to conditions including addressing acid sulphate soils	2(c), 2(f)
1	32.1	I also understand that Cable Sands have been unable to rehabilitate pasture in affected farmlands. As such, the statement noted appears misleading and a correction could be in order	The success of rehabilitation in farmlands post mining is beyond the scope of this document. Anecdotal comments from the land owner and casual observations would indicate that successful restoration to productive pasture is achievable	2(c)
1	32.1	The statement, "the rehabilitation and/or recreational development... is ultimately dependent on mining being approved in the remainder of the 5 (g) reserve" (p120). This can not be true. Firstly, any mining company is obliged by law to rehabilitate any area subject to mining, regardless of other agreements. Secondly, the rehabilitation of the site is considered by many people to be an impossibility given the quality and biodiversity of the flora living in the area before mining occurred. The statement noted above is misleading in that it infers that further mining is necessary (which is not true) and suggests that CALM and the Department of the Environment are unable to prevent further damage to the area	The comments relate to the rehabilitation of the 1083 hectare parcel of land NL 12897 [partly cleared and grazed] and the future recreational development on this parcel of land. This parcel of land [NL 12897] will transfer back to Cable Sands [Bemax] if mining in the 5(1)(g) reserve is not approved. Recent developments would indicate that the majority of NL 12897 will transfer back to Cable Sands and mining will not go ahead	2(g)
1	32.1	The 1083 Ha land parcel is even closer to Lake Jasper. Surely there are mineral sands minable that are not so close (just a few hundred metres if the maps are accurate) to an important natural environment. Also, this area is shown to be of high biological diversity, with the most endemic species according to this Plan	As above, the land parcel is not going to be mined, it is part of the conservation offset if Cable Sands mine the 5(1)(g) reserve further	2(g)
1	32.1	P120 Mineral Resources and Prospecting, para 5. Surely there should be an independent assessment (i.e. not by Cable Sands)	This is standard and is submitted to the EPA for assessment	2(c), 2(f)
1	32.1	In addition to Jangardup South, Cable Sands located other mineralization and a large deposit of titanium-zircon minerals. At Malimup the company identified a large and extensive deposit in and below the frontal dunes. However, the company recognized that mining in such a sensitive situation would generate unacceptable environmental impacts and refused to progress with evaluation. The Minister for State Development has created a Mining Act Section 19 reservation over the deposit to facilitate the State Government managing future access to it. <i>Add reference to Cable's additional mineralization, the Malimup find and to the Section 19 Reservation</i>	Plan will be amended	1(e)
1	32	I would recommend that the objective of the mineral resources section be rephrased to read: "The objective is to eliminate any impact of exploration and resource extraction within and adjacent to the parks on values of the parks". The Key Points of that section (p122) should be amended accordingly	Any mining activity will have some impact	2(d)
2	32	Basic raw materials for park management should not be sourced within the national park. This park is very narrow and it would normally be little trouble to source materials outside the park and transport them to the required site	Noted. However the Department may have need for basic raw materials to implement the works program outlined in this management plan	2(e)
1	32	Any basic raw materials extracted from the parks should be used exclusively to benefit the management of the parks and not for any other purposes. Wherever possible, they should be extracted from cleared land outside the parks	Noted	2(a)
1	32	Consideration should be given to expanding strategy 9 on p 122 to allow basic raw materials to be sourced from within the parks to be used by others (e.g. Shire) if no other resource is economically available and the work benefits the management of the parks and key infrastructure servicing the parks	Proposals to take basic raw materials from the parks are subject to application of Department and Conservation Commission policies	2(d)
1	32	CALM should make available basic raw materials from the parks to Main Roads for road construction or improvements to roads through or bordering the parks if no practical alternative source is available and the impact on park environmental values is acceptable to CALM. Improvement of the road network within or bordering the parks should be considered by CALM for benefit to the management of the parks. Suggested wording is "Others can only use basic raw materials sourced within the parks if no other resource is reasonably available, the impact on park values is acceptable to CALM and the work benefits the management of the parks. Proposals for construction or improvement of roads within and bordering the parks can be considered to assess the benefit to management of the parks"	As above	2(d)
	32	Rehabilitation of existing gravel pits is supported. We would like to see a benchmark for this rehabilitation	A key performance indicator is provided for rehabilitation of gravel pits in section 37 which would require benchmarking	2(a)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
2	32	Flora and vegetation studies should be carried out in the areas under immediate threat from mining. Also detailed fauna studies, particularly waterbirds, as this is a nationally significant area	Mining exploration and development is subject to environmental assessment including flora and fauna surveys	2(c), 2(f)
	33	Commercial Fishing		
2	33	No fishing should be permitted in estuaries within the parks. These water bodies should be added to the parks or declared separate marine parks to create a more integrated ecological reserve system on the south coast	The plan will be clarified to state that no estuarine commercial fishing occurs in the estuaries of the parks, only adjacent in Broke Inlet	1(e)
2	33	We are also concerned about the impact of the Gardner River fishing operation and this should be closed	The management of commercial fishing is the prime responsibility of the Department of Fisheries and any impacts from commercial fishing on areas outside of the parks should be discussed with the Department of Fisheries	2(c)
2	33	Commercial fishing in the sea accessed from within the parks is having a detrimental effect and so these activities must be changed. No beach use by vehicles should be permitted if the vehicle is part of a commercial operation	As above	2(c)
2	33	Commercial fishing in the sea adjacent to the national parks should be phased out. This will lead to a greater marine diversity and create more potential for recreational diving	As above	2(c)
1	33	There is currently only a very small number of commercial fishing licences issued to professional fishermen for the Broke Inlet estuary, with the combined catches ranging from 5 to 10 tonnes annually according to the figures given on page 44 of the Augusta-Walpole Coastal Strategy. Bearing in mind that the Broke Inlet is likely to become a Marine Park and that the D'Entrecasteaux National Park could be listed as a World Heritage Area, it should be considered to fade out commercial fishing operations in the Broke Inlet estuary. This could be done by negotiating with the current licence holders a buy-back offer which would compensate them for the anticipated loss of income from the sale of their catches. Accurate figures for their annual income from fishing the Broke Inlet estuary could perhaps be derived from the licence holder's most recent Taxation returns or from the Department of Fisheries records. I feel that the Department of Fisheries would support such buy-back negotiations. Fade out commercial fishing operations in the Broke Inlet estuary	As above. Broke Inlet is also not the park and therefore outside the scope of this plan	2(c)
1	33	Professional fishing in Broke Inlet is not sustainable. For example, I have been going to Broke Inlet for 30 years, once you could catch fish anytime of the day but in the last 5 years you could spend a month at Broke Inlet and catch nothing. This is no exaggeration. Therefore this is definitely not sustainable	As above	2(c)
1	33	I would not support a marine park within Broke Inlet but suggest if the planners want to prevent professional fishing in the inlet the fishing licences should be bought back as they are in the Eastern States	This is beyond the scope of this management plan	2 (c)
1	33	I also note that "All [fishing boat] operators mostly use Windy Harbour reserve for accommodation and do not camp in the parks" (p123). This sentence is ambiguous in that it appears to imply that camping does in fact occur elsewhere than Windy Harbour. I would suggest that the statement be put more clearly, to indicate whether or not camping occurs in Windy Harbour or elsewhere as well	Sentence changed and word "mostly" removed. There used to be a low level of and infrequent camping at Fishcreek - professional abalone divers, however this has not happened for a long time	1(e)
2	33	The conservation of marine life in the sea adjacent to the park should also be considered integrally with land conservation. As we build a system of marine reserves, locations adjacent to terrestrial national parks are important since there is less chance of damage from human activities, and biological links between the land and sea have more chance of surviving	Noted, and if there were any existing marine reserves adjacent to the parks, this would have been taken into account. If any new reserves are created this will also be taken into account when considering sanctuary zones etc	2(c)
1	33	All the commercial fishing areas are in the D'Entrecasteaux National Park. This section of the draft plan is irrelevant to the Shannon National Park	Noted	2(b)
	34	Defence Force Training		
2	34	Australia has numerous open spaces which are not protected as national parks and this is where defence force operations should be occurring, not in precious national parks. We oppose any future use for such operations	The plan reflects current Departmental policy in respect of use of lands for defence training	2(f)
1	34	I would like to see no defence training	As above	2(f)
1	34	Oppose and instead recommend no defence training in the parks	As above	2(f)
1	34	Opposed to defence training in the parks. If there is to be defence training it must not occur in the wilderness areas	As above, however plan will be amended to state that defence training cannot occur in the wilderness areas	1(d)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	34	Given that much of the park will be wilderness or surrounding wilderness, I argue that there must be no defence training in the parks	As above	1(d)
	35	Scientific and Research Use		
1	35	I fully support the study of the Parks' ecosystems (p124). It is increasingly clear that many management decisions are based on information that has not yet been suitably verified. In accordance with the precautionary principle, no amount of information can be excessive, if it prevents errors in management	Noted	2(a)
2	35	We support these activities provided they do not in any way cause harm to the national parks i.e. disease risk is strictly controlled, existing roads are closed as required for park management and not dictated by researchers' requirements etc	Noted. The plan outlines that permits to undertake research are subject to conditions including protection of natural values	2(a), 2(d)
1	35	I would also recommend that community groups be more frequently involved in research. This can provide a willing and interested resource base for volunteers, who are often very pleased to be involved in monitoring and mapping of flora and fauna, for example. Many local people already know the areas well and can provide valuable information. I suggest that CALM would benefit substantially from greater partnerships with community groups, both academically and economically	Noted. Part G Involving the Community details how people may be involved in management including membership of a 'Friends' group. Section 35 is specifically about external research	2(a)
1	35	The stated objective of encouraging and assisting external researchers where the outcomes are relevant to the Department, is nothing more than opting out of the Government's responsibilities to fund and conduct research itself	Section 35 is specifically about ensuring external research is undertaken in a sustainable manner, Departmental research is referred to throughout the plan and in particular within section 44 Research and Monitoring	2(g)
1	35	CALM should be undertaking research in these areas with its own resources, including the major wildlife research facility at Woodvale	As above	2(g)
1	35	This plan could also be a vehicle for promoting the re-establishment of an effective multidisciplinary research station at Manjimup, as used to be the case until recently	Department staff will continue to pursue its own research with some research officers based in Manjimup	2(c)
1	35	The outcomes of the research should be relevant to management of the park and meeting management objectives, not 'to the Department' as stated	Objective will be changed to refer to the objectives of the management plan or other Departmental objectives	1(e)
1	35	Surely the objective should be "conduct, encourage and assist" and be "relevant to park management objectives". Relevant to the Department implies that it just wants to offset the costs for work it should be doing itself	As above, section 44 refers to Departmental research and the draft makes that clear	2(d)
	36	Public and Private Utilities and Services		
2	36	Utility access to enclaves should not be allowed since technology now exists to provide power, telephones, internet, water and sewerage at any remote site locally and sustainably. Owners of land within national parks need to be educated to accept this as the norm	The enclaves which pre-date the national park, are the responsibility of the local shire to provide services. However an action will be added that states alternate green power etc will be encouraged by the Department	1(d)
2	36	Steps should be taken to ensure existing corridors be removed and rehabilitated, and owners encouraged to provide their own local services	As above	1(d)
2	36	No communication towers - departmental or otherwise - should be permitted within the parks and existing towers should be relocated outside the park. Towers create visual pollution, their radiation could damage flora and fauna, and access to them can be a serious impact	Communication towers provide essential services for management including addressing safety issues. Siting of towers are subject to environmental and visual landscape criteria	2(d)
1	36	P125, Strategy 2. Will such a prescription allow CALM to grant leases/licences etc for power lines, water pipelines, fibre optic cable, gas lines and the like? If the Department receives an application for such an installation to proceed, the usual checks would be made in respect to the potential for impacts on the environment. Would you consider that should the assessment result in an acceptable situation that the draft management plan would allow for the installation to proceed? It is not that our unit within CALM is particularly pro in having infrastructure on national parks, but there are occasions when public and private utilities appear to have little choice but to access through CALM-managed land. While not necessarily agreeing to allowing every proposed impact on the national park to proceed, having the ability to approve infrastructure when appropriate, would be helpful	Strategy 2 will be clarified	1(e)
1	36	P125, Strategy 2. In respect to new communication towers, the non-permission of any new non-Departmental towers is on one hand understandable and acceptable. However, could the wording be altered slightly to allow for new communication towers in some special circumstances to be permitted. Two reasons come to mind. In some circumstances, new tower proposals appear to be the result of a government initiative to have a prescribed number of towers installed within a set time frame.	The parks are in a remote setting and the strategy is specifically worded to exclude new tower proposals	2(d)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
		From time to time, other viable options are not available off the conservation estate, and there can be a real requirement by communication carriers to access the estate - in this case the national parks. A case such as this occurred in the Stirling Range National Park, where the communication carrier wanted to establish the tower on Moir Hill. While the tower was not really consistent with the national park status, it was agreed to on the basis of the value that it would provide in cases of emergency		
1	36	Relevant recommendation from Shire of Manjimup to DPI on the Draft Augusta Walpole Coastal Strategy includes: No provision of reticulated power at Windy Harbour due to prohibitive costs and funding limitations. Develop guidelines for appropriate energy sources to be provided 'on-site'	Noted, this will be mentioned in the final plan	1(a)
1	36	Connection of Windy Harbour to grid power supply would require the permission of the Conservation Commission. DPI understands that a power easement through the national park has not been supported in the past. This was for an above ground option and was rejected on grounds of visual impact and potential disease risk. An underground option was not considered to be economically feasible. This view should be confirmed or discussed in the management plan	This will be clarified in the final plan	1(e)
1	36	Among other statements, the current draft AWCS includes the following information in relation to Windy Harbour: "Windy Harbour is not currently connected to the power grid (DPI,2003). Previous proposals to connect Windy Harbour to the nearest link point to the grid at Northcliffe have failed to gain environmental approval. This was for an above ground option, and was rejected on grounds of visual impact and potential disease risk. An underground option was not considered to be economically feasible. Alternatives have been investigated as part of the Windy Harbour Management Plan (Shire of Manjimup, 1999). Walpole is supplied via a 22kv transmission line from Denmark on a single radial feed. This single feed requires shutdowns for any maintenance, but has ample capacity to service moderate growth. Some areas contain overhead powerlines that may restrict development."	Noted	2(b)
	37	Rehabilitation		
1	37	I would like to see revegetation with endemic species by seed sowing in any areas that are cleared, old tracks/roads etc	The plan provides for this to occur	2(a)
2	37	The key points and strategies in the section are all supported	Noted	2(a)
1	37	Restoring degraded areas to as near a natural state as possible by closing roads, involving the public in rehabilitation programs and using local flora will do nothing to rehabilitate thousands of hectares of forest that has been disturbed by selective logging in the Shannon National Park	The previously logged areas in Shannon National Park will be monitored and remedial action taken where required to ensure that in the longer term the forest structure and diversity is consistent with the conservation values and objectives of the National Park. It is noted that the desired stand structure and species diversity associated with "production forest" available for timber harvesting may be different to the desired structure and diversity associated with "conservation forest". This will be clarified in the final plan	1(e)
1	37	The Shannon River high karri forest was logged in the 1950s using a selective thinning silvicultural operation. There was no clear felling at that time, there was a limited culling of over-mature trees but all the younger healthy trees were retained as future crop trees. To replace harvested trees after logging disturbance, karri seedlings, in order to compete with understorey vegetation, need a clean ash bed resulting from an intense fire. But because such an intense fire was not possible without severely damaging the retained trees, all attempts to establish adequate regeneration following this selective harvest was unsuccessful. These areas remain with far lower stocking rates than existed in the virgin forest prior to the selective harvesting operations. The draft plan makes no provision for replacing the harvested trees and its do-nothing approach will never result in a return to a fully stocked forest unless a wildfire kills most of the retained trees	As above	1(e)
1	37	The draft says the objective will be achieved by closing roads, involving the public in rehabilitation programs and using local flora. Why is there no plan for rehabilitating the 10,000Ha of forest that has been disturbed by selective logging in the Shannon National Park where trees are thin on the ground?	As above	1(e)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	37	Restoring degraded areas to as near a natural state as possible by closing roads, involving the public in rehabilitation programs and using local flora will do nothing to restore the vast areas of savannah grasslands in the D'Entrecasteaux National Park that are becoming extinct by the application of a burning regime based on flawed logic	This is covered in the fire section of the draft plan. Page 66 refers to coastal woodlands and that further research and adaptive management experimentation is required to determine the most appropriate fire regime for these coastal woodlands. Work has commenced through development of a Draft Fire Management Guideline and an operational trial in D'Entrecasteaux National Park east of Windy Harbour - this involves frequent application of fire to create a coarse grain mosaic or patchwork of burnt and unburnt areas with a particular focus on sustaining key vegetation complexes such as the Warren River cedar and mature peppermint woodlands and the open grasslands. The final plan will clarify this	1(e)
1	37	The objective on P126 is a joke - while the government and CALM continue their policy on burning this will never be achieved. The Aboriginals burnt the lands regularly and taught our forefathers to do the same. This is now not allowed and the changes to the environment are very evident from descriptions given by our forefathers	Your comment relates to the fire section more than to section 37. This section is focussing on rehabilitation following disturbance such as mining, forestry and roading. Page 63 of the draft plan refers to Aboriginal burning and concludes that environmental conditions have been altered to such a degree over the past 100 years that historic fire regimes may no longer meet biodiversity conservation outcomes. However, the coastal woodlands are mentioned as discussed above for further research and adaptive management	2(d)
	38	Beekeeping		
1	38	P127 recognises annual honey production of \$9.3 million and a total worth to agriculture of \$120 million per annum	Noted, this comment is a quote from the draft	2(a)
1	38	The value to the community through food crop pollination of a viable Australian beekeeping industry far exceeds the income of industry members. It is in the wider community's best interests that wherever possible, the traditional access for beekeepers to Australian forests be maintained	Beekeeping will be maintained where natural values are not adversely impacted	2(d)
1	38	I have five sites in the Shannon National park and include AS 4028, 4029, 4030, 4031 & 5565. My apiary sites in the parks are a valuable part of my business for the production of both Karri and Marri honey. I have used these sites on many occasions over the previous 30 years and these sites have provided a production resource which is integral to the viability of my apiary business. The continued availability of the Karri and Marri resource in the Shannon National Park in years to come is essential to the long term stability of my apiary business	Noted. AS 4029 has since been relocated to a 'suitable but constrained' area. So all your sites can continue at the moment under the indicated conditions to protect the values identified such as conservation flora present and old growth forest	2(b)
1	38	p127 Para 1. Beekeepers are increasingly dependent on CALM land mainly due to the cyclic nature of existing nectar sources. This means that beekeepers have to transport their bees over long distances and it usually requires access to apiary sites on CALM controlled land	Noted	2(b)
1	38	I note that the CALM Policy Statement No 41 "Beekeeping on public land" is currently under review and that the outcomes of that review may influence the DMP	The draft policy has deferred to the management planning process to set further guidance for the apiary analysis for conservation reserves. As such, the management planning process for this planning areas and others will feed into the finalisation of Policy 41	2(b)
1	38	p127, Para 3. CALM Policy Statement No. 41 appears to be self defeating as a management plan cannot be prepared unless managed bees are placed in the area and studied for at least two years to determine their effect on native flora and fauna. Such studies need to have financial support to ensure that honey bees are maintained on site by one or more beekeepers for the entire study period. The study areas need to be of recognised importance to commercial beekeepers. It is possible that industry may be asked to partially fund such studies in the future	There does not need to be any apiary activity inside a management planning area to undertake the apiary assessment. Further research is encouraged, however the assessment uses predictions based on best available knowledge	2(g)
1	38	3/3 Para 3. Industry has requested that a temporary permit be given to beekeepers to access restricted CALM land when there is a strong seasonal honey flow	Noted. The management plan has assessed which areas are suitable for beekeeping, whether the permit is temporary or not is outside the scope of the management plan as long as the recommendations of the management plan are adhered to in terms of conditions etc	2(b), 2(c)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	38	There is no doubt at this point in time that industry has no understanding of the new apiary policy, the new conditions or the impact of all the new regulations about to be imposed on the industry to back up all the new conditions under the new policy. How could one possibly comment? It could be quite reasonable concluded that CALM's intention is to make Apiary Sites virtually unworkable, thereby in a back door way, slowly reducing the apiary industry's use of all conserved areas. There is little to suggest otherwise throughout the proposed plan in all the relevant sections relating to apiary or bees. If we had some reasonable understanding of this new policy and new conditions and regulations and how they might work or be administered by CALM, then we may not come to the conclusions that we have	The revised Policy 41 was made available for public comment in 2004 for a period of 2 months. The Department has continued to liaise with the Beekeepers Consultative Committee on issues relating to the revised policy. The policy will be finalised once the <i>Forest Management Regulations 1993</i> have been amended. The apiary analysis for the parks was discussed at a meeting in November 2004. If a site is assessed as being 'highly constrained' through the management plan apiary analysis process, then the site will be relocated or alternative sites will be attempted to be made available from the 'pool' sites. If a site is assessed as 'suitable but constrained' then there are additional conditions that will be added to the permit including seasonal restrictions in some cases. This is instead of closing the site, which may have been the case previously. Some the Department is trying to be as accommodating as possible. However, the primary responsibility of the Department remains the protection of biodiversity values and this takes precedence	2(d)
1	38	What is need is a full information workshop meeting between CALM and the Apiary Industry involving all stakeholders of CALM and industry to work through and understand all these new changes, conditions, regulations, requirements, restrictions and how they will work and affect our Apiary Sites and how we might or might not use Apiary Sites in the future. The Beekeepers Consultative Committee (BCC) it seems is now pretty much a failure because it no longer seems to be a useful link between CALM and the broader industry. If industry is to work constructively with CALM in the future then now is the time to get things right before this plan and others become final	As above. The Beekeepers Consultative Committee meets 2 times per year to discuss issues of mutual concern. If the submitter continues to have issues then these need to be brought to the attention of the BCC or contacting the Department's Apiary Coordinator	2(d)
1	38	The window for commercial production in a given locality may be relatively short (4-6 weeks) and infrequent. As such we seek your assistance to ensure free unencumbered access is maintained for beekeeping and others on a legally tenable and viable basis	Noted. Access will be via public access roads or, subject to permit conditions, along management access tracks. Seasonal restrictions may apply in the 'suitable but constrained' category and this is to protect rare and the high priority species being impacted by honey bees	2(d)
1	38	We would like to note that the use of apiary sites by commercial apiarists should not create a problem because in the last 70 years there has never been a great influx of commercial hives. In fact one could argue that the days are well past when there was real potential to expand commercial production in many of the state forests and parks	Noted	2(b)
1	38	A strong case does not exist for management policies to be developed for conserved areas which excludes the operations of migratory, commercially managed apiaries particularly when there has been a long history of beekeeping use in that location	The primary responsibility for the Department is to conserve biodiversity. Activities such as beekeeping that impact on this must be addressed in a management plan	2(e)
1	38	All issues appear to have been covered in detail by interested parties other than beekeepers. Previous submissions on this from the beekeeping industry appear to have been ignored. The need for continued access to existing apiary sites on Crown land proposed for inclusion in conservation areas is of paramount importance to the beekeeping industry	Noted. The Beekeepers Consultative Committee and industry have been consulted in developing the new draft Policy 41 and the apiary analysis process. Apiculture is proposed to continue in the parks as per the draft management plan	2(g)
1	38	I would agree that some apiary sites are simply not appropriate given their proximity to areas of high conservation value. In particular, sites close to areas identified as being of high biodiversity (as noted on Map 9) should be considered 'off limits' for apiarists. There may, however, be some scope to allow apiary sites in areas of conservation value where biodiversity is below a certain level. This would provide a reasonable compromise, and recognises the valuable contribution made by honey bees to agriculture which can occur up to the boundary of a national park	The management plan provides for apiary within the parks	2(g)
1	38	If the beekeeping industry is going to be asked to fully fund the cost of administration of the CALM beekeeping section then the Department should make access available to all registered sites including the areas in question	Access will continue to be provided via public access roads and tracks (see Map 12) and, subject to District permission, via management access tracks. The recouping of expenses from the Apiary industry is outside of the scope of the management plan	2(c)
4+1	38	I would like to see no renewal of apiarist permits within the parks	Beekeeping is regarded as a legitimate use of natural resources on appropriate Departmental managed lands. Permit conditions address environmental and management issues to ensure protection of natural and recreational values. Bees are a valuable resource to the industry and are unlikely to be 'deliberately released'. Where there is a feral honey bee control program in place, there will be restrictions on apiary use to prevent swarming. The apiary analysis used for this plan is a new, more robust process used to determine the suitability of a site, additional conditions and takes a precautionary approach	2(d), 2(e), 2(f)
1	38	Commercial beekeeping is totally against the spirit and intent of a national park	As above	2(d), 2(e), 2(f)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	38	Obviously the "precautionary principle" that has been used as an excuse to axe all timber harvesting for fear that it 'may' cause damage to biodiversity, does not apply to the keeping of introduced bees. To be consistent, beekeeping should not be permitted in the parks	As above	2(d), 2(e), 2(f)
2	38	The impact on native bees and consequently native flora must be viewed as undesirable	As above	2(d), 2(e), 2(f)
1	38	Beekeeping is acknowledged as having an impact on park values but the plan is to continue to support it by researching its impact, applying additional conditions, renewing old sites, allowing some new ones and liaising with the industry. The "precautionary principle" that was applied as a basis for closure of the timber industry, banning domestic dogs and constraining many forms of recreation does not appear to apply to the deliberately released feral bees in the parks. If this plan is to be consistent in its treatment of different land uses or practices, bee keeping should be banned in the two national parks	As above	2(d), 2(e), 2(f)
913+1	38	Strongly oppose the proposal to allow bee keepers to have sites in the national parks as escaped bees are not compatible with native fauna and flora	As above	2(d), 2(e), 2(f)
1	38	No "bee keeping" as feral bees invade nesting hollows/logs and rock outcrops causing an environmental hazard	As above	2(d), 2(e), 2(f)
2	38	Do not support these parks being used by apiarists as the feral honey bee has significant adverse impacts on the environment	As above	2(d), 2(e), 2(f)
2	38	Oppose the renewal of apiarist permits within the parks as location of bee hives within the parks increases the risk of feral bee escapes and associated native pollination intervention	As above	2(d), 2(e), 2(f)
2	38	The honey bee invariably establishes feral colonies in the wild, and this would impact adversely on native fauna which relies on hollows for breeding	As above	2(d), 2(e), 2(f)
1	38	Whilst I understand the need for CALM to manage the parks for a variety of different stakeholders and needs, conservation of species of flora and fauna should be the highest and over-riding factor in decision making. I strongly object to any apiary sites within the park and think that to gradually phase them out totally would be the best option and that there should be no renewal of apiarist permits within the parks. Feral bees displace hollow dependent species, compete with nectar dependent native species and possibly affect pollination of native plants. There are currently thousands of apiaries in WA, we need to ensure certain areas are feral bee free, and that their impacts are minimised within high conservation areas like this one	As above. There are feral bees within the parks, as the draft states if these are removed then there are additional conditions to prevent swarming	2(d), 2(e), 2(f)
2	38	Strongly disagree that apiary sites be located within or near the national parks. This practice should cease immediately. As well as impacting significantly on the flora and fauna of the parks, the apiarists require access and so increase pressure to keep otherwise un-needed roads open and increase the chance of disease transport when moving through the park	As above. No access is being kept open solely for apiary use. Apiarists use public roads or can request permission to use management access tracks. There may also be restrictions on access if there a risk of disease spread	2(d), 2(e), 2(f)
1	38	p127, Para 4. The suggestion that feral bees could be removed and replaced years later by swarms from managed bees is a general possibility but good management of an apiary would ensure that swarming did not occur	Noted	2(a), 2(d)
1	38	Substitute "...this distance historically agreed with the Agriculture Department and CALM" rather than "this distance chosen by industry". It should be noted that it is critical to keep the distance between sites and only in isolated cases should this be changed where it compromises recreational areas	The 3km distance was in use well before the <i>Forest Management Regulations 1993</i> , and has been continually agreed upon by industry as you seem to agree. The text will be clarified. Please note that our assessment still seeks to maintain 3km apart between sites	1(e)
1	38	We know that sometimes (as is the case with the Shannon & D'Entrecasteaux National Parks) sites may be used infrequently or not at all for some years, until the need arises or conditions are right for commercial practices to take place in them. Moving apiary sites may therefore reduce the potential for viable production but worse still if a site is cancelled the resource may be lost forever	Noted. Sites are only cancelled when assessed as being 'highly constrained' during the management plan assessment. These sites will be relocated if suitable sites are available	2(d)
1	38	It may be helpful to add for the purposes of this review, a classification of 'not appropriate' to indicate which apiary sites are due to be removed from the maps	The classification 'highly constrained' is clearly defined and Appendix 14 indicates which sites fall into this classification	2(a), 2(d)
1	38	p128 para 3. The categories show a significant change in the policy of CALM. Surely such a change should have been openly discussed with all the BCC committee	The apiary analysis for parks was discussed at a meeting in November 2004	2(d), 2(g)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	38	p128, para 5. Again indicates no discussion with the industry as all sites (100%) fall in these two categories being conditional or highly constrained locations for apiary sites. It is industry's desire to see that "all affected sites must be discussed with beekeepers and the BCC. Any discussion should be at the BCC level"	It is expected that in areas of high conservation value such as national parks, that most apiary analysis will result in sites falling within the suitable but conditional or on occasion, the highly constrained setting. The results of the parks apiary analysis was discussed with the BCC in November 2004	2(d), 2(g)
1	38	p128, para 6. New sites being permitted within the areas identified as suitable as long as there is existing access is new policy. Was this indeed fully discussed with the consultative committee of the BCC?	The revised Policy 41 currently identifies that management planning processes may increase sites in national parks. The revised Policy 41 was made available for public comment in June 2004 for a period of 2 months and has been discussed at the BCC. The Department has continued to liaise with the Beekeepers Consultative Committee on issues relating to the revised policy	2(b), 2(b)
1	38	The industry requires a detailed map of the planning area showing all current and potential future apiary sites so it can understand the plan in detail. This was not supplied in the draft plan document	The results of the apiary analysis as part of the management planning process was presented to the BCC in November 2005. Maps of current sites are available from the Department's Apiary section	2(d)
1	38	Who would determine hive limits and on what criteria? Beekeepers need to be involved on any discussion of hive limits being imposed so as to be able to make a commercial decision on the economic return and viability of the site. Seasonal requirements would need to be one of the criteria considered at the very least	Hive limits would be determined between the Department and the beekeeper during the renewal of their permit where Additional Condition B is selected (Appendix 14). This condition will protect flora and communities where there is no predicted impact but very high conservation status so the limit is more about minimising the area disturbed and used within the site. Previously these sites may have been totally unavailable for apiary due to the high conservation flora. It is noted that seasonal restrictions may make the site uneconomic	2(b)
1	38	Encourage best-practice management by apiarists to control queens and dispersal of new (feral) colonies (e.g. measures such as incorporating queen bee excluders into hives)	Noted	2(a)
1	38	Locking up the Queen bee is ridiculous and shows there is no understanding of the situation of commercial beekeeping. The structural modifications to restrict queen bee movements would pose a lot of practical problems i.e. Drone movements. Doing so makes the hives unworkable	During consultation with industry representatives and the Department of Agriculture, it was discussed that structural modifications would be possible. This would only be a condition if workable	2(d)
1	38	p212. Additional Condition "D" in Appendix 14 renders all sites within the "Plan" restricted during the spring. This may not be a large problem as Commercial beekeepers seldom use this area at that time (spring) however it could still be an issue that needs addressing	Additional condition D relates to when there is a feral honey bee control program in place and it may not affect the whole plan area. If structural modifications were possible to restrict the queen, then apiary use could continue	2(d), 2(g)
1	38	Day to day operations of bee keepers in conserved areas should be consistent with reasonable management guidelines	Noted	2(b)
1	38	There is a big gap in the management plan as far as the needs of the beekeeping industry is concerned. The constraint conditions put on beekeepers can vary so widely resulting in the conclusion that the plan is biased toward the general exclusion of apiary sites from these parks	In theory the apiary analysis allows for an increase in apiary sites in conservation areas as long as there is history of use, a suitable assessment, existing public access and desirable resources for apiculture. The draft plan does not exclude apiary from the parks, however it is very clear that protecting the natural values of the parks is foremost	2(d), 2(g)
1	38	When referring to beekeeping on CALM managed lands, CALM seems to us to be using "may be" when suggesting honey bees could be a problem. Thus type of word use could be a problem in interpretation to any number of readers. The document needs to better reflect actuals rather than "may be"	The words "may be" are stated in one of the key points and are appropriate in this context. The results of the apiary analysis have been based on the best available knowledge at the time but still are predicted impacts	2(d)
1	38	AHBIC submits the impact of commercially managed honeybees over and above the impact of permanent feral honeybee populations in Australia conserved areas to be minimal	The impact of feral honeybees is comprehensively discussed in section 20 Introduced and Other Problem Animals	2(e)
1	38	p127, Para 5. The results of the Dean Paini (BSc Hons.) thesis "The Impact of the European Honey Bee (<i>Apis Mellifera</i>) on Australian Native Bees" (2004) should be accepted by CALM as an indication that the honey bee has little or no affect on the natural environment or native bee populations in WA	With regards to D. Paini's PhD thesis, finding a positive, neutral or negative impact on one species of native bee does not provide any basis for generalizing to the overall impact on the native bee fauna of a locality. However, for your information Paini and Roberts' paper in <i>Biological Conservation</i> 123 (2005) concluded that commercial honey bees reduce the fecundity of an Australian native bee that they studied	2(d), 2(g)
1	38	p128 Paras 3 & 4 The Paini study results should be noted here. It is conspicuous by its absence that reference to an experienced and respected commercial beekeeper was not included as part of the best available knowledge at the time	As above	2(d), 2(g)
1	38	p129 Regarding relevant studies, it is apparent that CALM is reluctant to accept results that do not confirm established policy e.g. Dean Paini 2004 thesis report	As above	2(d), 2(g)
1	38	The Key Points and Objectives seem to cover most points however as long as there is a fair input from industry before this draft document goes to a final draft, we feel sure the issues identified can be amicably resolved	Noted. The results of the parks apiary analysis was discussed with the BCC in November 2004	2(a), 2(d)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	38	Key Point 4. Precautionary and pragmatic approach to beekeeping in the parks. It is apparent that some policy proposals are put forward (by CALM) time and time again attracting the same adverse comments from beekeepers. There is an obvious need for CALM to heed the comments and advice given in previous submissions on this subject	A selection of apiarists were consulted on the proposed methodology for the parks and a positive feedback was received in addition to the results later being discussed at the BCC meeting in November 2004	2(d), 2(e), 2(g)
1	38	I also note the proposal to remove certain sensitive sites that have been classified as "highly constrained". Proposals to ban apiary sites from all areas within five to ten kilometres of all national parks have also been made	Sites assessed as being 'highly constrained' during the management plan assessment will be closed or relocated if suitable sites are available. Your last statement is erroneous. A 2km buffer surrounding the planning area will be assessed for impacts and recommendations will be made accordingly	2(b), 2(g)
1	38	Why is AS 4029 to be cancelled? When Big Trees Drive was constructed along Upper Shannon Road AS 4029 was relocated to an old gravel pit on Buffer 2 road ~ 1 km from the old position. We have used this new location at least 3 times since and to my knowledge there has been no conflict with tourism	AS 4029 was located too close to a walk trail. After publication of the draft and after negotiation with the permit holder the site was relocated in October 2006. The final plan will reflect that the site has been moved and is now located in 'suitable but constrained'	1(e)
1	38	p128, para 8. Of the five listed sites we understand that sites 4029 has already been moved along with 4262. In this first sentence we want to see the words "cancelled and - plus - where possible" removed so it now reads "... 5081 & 5271 will be relocated in negotiation.."	As above. Sites assessed as being 'highly constrained' are either relocated after negotiation with the relevant beekeeper or offered a site from the pool, if available. This process may involve the site being cancelled so the text will not be amended. However the text should have referred to site 4264 not 4262 as being highly constrained	1(e)
1	38	Rather than cancel a bee site we propose a 6 week no access period for beekeepers to make use of the resource before it is once again returned to the community for use. The word cancel should be removed and it should be emphasised and made to read "relocated as near as possible to the existing site"	Cancellation may be the only option, however the Department will work with the permit holder to relocate where possible	2(d)
1	38	Shifting of sites raises the biggest question - Where to? Most good remaining viable sites have long been taken up over the last 50 years by beekeepers. Sites that remain are often not of greater value	The Department would work with the apiarist to find another site if possible. In this assessment only 5 sites needed relocating	2(b)
1	38	What input has industry had into the draft other than a possible preview by two individuals (one of whom was not even recorded as being on the Beekeepers Consultative Committee)? During the CALM BCC meeting held 18 July 2005, we suggested that the first industry was aware of the detail in the printed draft plan was when they got the book. Subsequent re-qualification suggests again that not all members of the BCC Committee were being consulted on what was proposed. This being the case it makes questionable the validity of statements like "industry was consulted" when coming out with plans ever in a draft format. Your evidence to the contrary of the aforementioned would be appreciated as this point is not here to cause trouble or difficult but rather that should there have been a breakdown in communications then it need to be solved for the future. It has been suggested that when the Department is drawing up its management plans, commercial beekeepers should be make up some provisions on that committee so that 3 or 4 generations of practical experience is utilised	The revised Policy 41 was made available for public comment in June 2004 for a period of 2 months. The Department has continued to liaise with the Beekeepers Consultative Committee on issues relating to the revised policy. Consultation with the Department of Agriculture and two industry representatives was held to discuss the new approach to the apiary analysis to get some preliminary feedback during the preparation of the draft management plan for Shannon and D'Entrecasteaux National Parks. The draft management plan represents the formal process for input by the public including representative organisations. Detailed site by site consultation could not occur until the analysis was completed. The Shannon and D'Entrecasteaux National Parks Draft Management Plan was tabled at a BCC meeting in November 2005. Beekeepers are sent <i>The Planning Diary</i> to ensure they are aware of the management planning program. In addition the Departmental Apiary Coordinator forwards broadcast emails regarding planning issues	2(b)
1	38	Liaising with beekeepers (via BCC) and AGWA to ensure the most efficient and sustainable use of sites. CALM has been considered as an organisation that "shoots first and asks questions later" i.e. it publishes its policies before seeking submissions instead of getting affected people's advice before publication. An example is the BCC where representatives of organisations are advised of CALM's proposals and asked to comment but the representatives are not given the opportunity to go back to their members for feedback	As above	2(g)
1	38	p130. Regarding "referring to the EPA" raises the question how will this be policed?	It doesn't need to be policed, it is just an option if needed	2(d)
1	38	Action 10. Adjoining sites on private land may be referred to EPA. This would appear to be a time consuming, costly and ineffective exercise when taken into broader consideration. Firstly the EPA has no statutory power and can only recommend. Secondly the EPA cannot manage our environment in the best interest of the community. The only advantage of getting the EPA involved could be the possibility of research cost sharing	A positive result would always be pursued directly with the apiarist as a first step	2(d)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
	39	Forest Produce		
1	39	I only just became aware of the proposal to open these national parks to logging and I wanted to let you know that I am deeply concerned. It is important to me that the parks are preserved as wilderness areas, as, just as we are learning with our local water resources, they will only become more precious with time	There will be no logging in the parks. There will only be forest produce taken as the draft plan states to remove exotic trees, for therapeutic, scientific or horticultural purposes or for essential works	2(a), 2(g)
2	39	Disagree that the Executive Director be allowed to grant a licence to take forest produce from national parks for use for therapeutic and horticultural purposes. It could be interpreted that production quantities of park resources can be extracted	The intent of this part of the CALM Act and the text used in the management plan is clear. Refer to strategy 1	2(d), 2(f)
2	39	CALM Act should be amended the limit this right to allow only scientific investigation of therapeutic and horticultural uses for park species. If commercial quantities are required these must be produced elsewhere on private land, preferably already cleared	As above	2(d), 2(f)
1	39	Strategy 2. The term "royalty" was removed from the CALM Act in 2000 and replaced with the term "forest produce charge". However, there is no relationship between a forest produce charge and a s.99A licence, which can authorize the taking and removal of exotic trees and other forest produce from a national park. Under the circumstances, I recommend that "retaining the royalties" be deleted from the plan and "retaining any net revenue" be inserted instead	Management plan will be amended	1(e)
1	39	I submit that all trial plots should be removed from National Park areas and be rehabilitated with native species. From decades of monitoring the trial plots it should by now have become conclusively clear to CALM arboriculturists which species have commercial value. I can therefore see no valid reason why those plots should be retained any longer. The trees have long since attained maturity and are producing prolific amounts of seeds. The spread of wildlings beyond the peripheries of the plots is now becoming a costly management problem and CALM is presently developing a weed control programme in relation to the trial plots, including the mapping and control of pine wildling infestations	Some trial plots with non-native trees have historical value and can still provide useful information to park managers. Implementation of the management plan will include the progressive removal of exotic species that do not have landscape value from the parks and control of any regeneration or wildlings. Priorities for this work will be based the threats to biodiversity values	2(a), 2(d)
1	39	It is unlikely that CALM will consider the removal of the plots at this point in time but I include this comment nevertheless with a view that the matter of total removal of the plots will be discussed now, and will hopefully be resolved by the time the next Management Plan will be prepared in a decade's time. However, it is clear already that the trial plot plantations of introduced species will continue causing costly management problems, and that the plots have no long-term future in what is likely to become a World Heritage Area. Possible cross-pollination with foreign Eucalypt species is another concern. Remove all trial plot plantations from the planning area and other national parks	As above	2(a), 2(d)
2	39	The statement '...removing trees that pose a threat to the public' is far too general and essentially gives CALM an excuse to fell trees in the parks as it suits. When the public enters a national park they must expect an element of danger - why have you not said you will remove all snakes? Dangerous trees and other natural features which might pose a safety threat are part of the environment and simply required some public education as they enter potentially hazardous areas	The rationale for visitor risk management is clearly provided in section 29 and the Department's legal and moral responsibility in this regard. However, cross reference with this section will be made and strategy will be made more specific	1(e)
1	39	With regard to the use of other forest produce that may incidentally become available from operations elsewhere in the parks, it is, in my experience, not widely appreciated that such forest produce should not be used for making improvements (anywhere) unless this is actually provided for under the relevant management plan, e.g. operations such as removal of a dangerous tree, which may ultimately provide timber suitable for use in a construction project within the parks (bridge, viewing platform, etc). This contrasts with CALM's ability to use forest produce in the absence of a management plan in accordance with s.33 (1) (cb). Perhaps this should be addressed by providing in the plan to the effect that forest produce derived from the equivalent of necessary operations or compatible operations can be used for improvements (in my view such a provision should appear in all such plans because s.33 (1) (cb) becomes inoperative in relation to a park once an approved management plan for that park commences)	Noted. The management plan provides for this	2(a)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
1	39	Among other actions, the draft says the objective will be achieved by rehabilitating with native flora any areas where forest produce is removed. But there is no provision for replacing the trees harvested from 10,000Ha of tall forest that has not adequately regenerated due to inappropriate silviculture	The previously logged areas in Shannon National Park will be monitored and remedial action taken where required to ensure that in the longer term the forest structure and diversity is consistent with the conservation values and objectives of the national park. It is noted that the desired stand structure and species diversity associated with "production forest" available for timber harvesting may be different to the desired structure and diversity associated with "conservation forest". A strategy will be added to section 37 Rehabilitation regarding Shannon National Park	1(d)
	40	Water Resources		
	40.2	Groundwater		
2	40.2	Bore usage near the park appears to be on the increase particularly at the western end and this may have a longer term deleterious effect on the parks' water systems. It is essential that before any more bores are allowed in this area a detailed study be made of the Blackwood Groundwater Area and that further bores are refused if they will affect the parks	Noted. The monitoring of groundwater is the responsibility of the Department of Water, however an action will be added to make mention of this potential issue	1(d)
2	40.2	The current use of the deep Yarragadee aquifer is of concern, and the impacts from such abstraction need to be assessed and if causing any damage to the park, modified	As above, text will be updated with latest on the Yarragadee development	1(d)
1	40.2	Groundwater extraction must follow the precautionary principle	Noted, as above	2(a), 2(b), 2(c)
1	40.2	Any proposals to extract groundwater must be rigorously assessed and the precautionary principle followed. History in the eastern states demonstrates the catastrophe of over allocation. It is predicted that the South West will grow drier in the future. This also must be factored in as we don't know what will be the long term effects	Noted. Refer to Strategy 2	2(a), 2(b), 2(c)
27+1	40.2	Groundwater proposals need to be carefully scrutinised with respect to likely impacts, including effects in the national park. In particular the proposed Jangardup South mineral sand mine, situated in excised national park at Lake Jasper would require huge quantities of groundwater and the impact of this on surrounding ecosystems might be disastrous. Special attention should be paid to the Yarragadee aquifer	As above	2(a), 2(b), 2(c)
1	40.2	CALM should take a stand and say 'no' - to the pumping of water from the Yarragadee Aquifer at the Scott River. I believe this could have a devastating effect on the Park if it is permitted. So called experts have been known to be wrong in the past, the introduction of the Cane Toad is a prime example. Once the damage is done, we can not turn back the clock	Noted. In 2007, the State government decided not to proceed with the proposal to extract larger quantities of water from the Yarragadee groundwater aquifer	2(c)
1	40.2	Full assessment of water extraction from Yarragadee aquifer before further water extraction occurs	As above	2(c)
	40.3	Future Use		
1	40.3	There may be a future need for the Water Corporation to establish and operate infrastructure within the management plan area. Under "Future Use" on page 131 of the Draft management plan it is stated that "Unless the Conservation Commission agrees to allow access to the proponent, no licensed use of the water resources could take place in the park". Whilst the Corporation has received CALM's assurance that the permitting process will allow water resources to be developed in National Parks, there are still a number of issues outlined in the Corporation's letter to you dated 31 March 2004, that have to be progressed and resolved to address the current uncertainty that exists	Noted. The Department replied to the Water Corporation stating that the Department would be guided by the formal assessment by the EPA and with respect to large scale water removal by the Water Corporation, it is anticipated it would be subject to a whole of Government approach	2(b)
1	40	I would like to see no development of water supplies	Noted. However other legislation may apply to water extraction although conditions may be applied to ensure protection of biodiversity	2(c), 2(f)
2	40	It is incongruous that any water extraction or abstraction would ever be allowed within the parks	As above	2(c), 2(f)
2	40	Object to the development of water sources within the boundaries of the Park or in adjacent areas which may affect the park's values	As above	2(c), 2(f)
1	40	Given that much of the park will be wilderness or surrounding wilderness, I strongly oppose any further development of water supplies within the parks	As above	2(c), 2(f)
4	40	Oppose and instead recommend no development of water supplies within the parks	As above	2(c), 2(f)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
2	40	Agree with the measures suggested to ensure waterways catchments upstream of the parks are not damaged and preferably protected. Every effort must be made to ensure no damming of these waterways rather than the suggested 'ensure sufficient environmental flows' - diminished flows would degrade the parks significantly	As above	2(c), 2(f)
2	40	Water supply for Windy Harbour from bore holes within the parks must be terminated and substituted by rain tanks or a cartage service. CALM should liaise with the Shire of Manjimup to ensure this occurs	The Department is liaising with the Shire of Manjimup to ensure water extraction is sustainable in the long term with minimal impact on the park values. Rain water tanks will be encouraged as well as other water sensitive designs. The plan will clarify this	1(e)
1	40	Relevant recommendation from Shire of Manjimup to DPI on the Draft Augusta Walpole Coastal Strategy includes: Secure future access to water sources for Windy Harbour, increasingly meet regulatory standards and ensure a sustainable approach to water use. This is likely to require measures including no unauthorised bores, metering and charging for water, encouraging water sensitive developments/designs and investigate opportunities for safe water re-use	As above	1(e)
1	40.2	The draft plan indicates that the bores for the supply of water to the Windy Harbour settlement are located in national park. Negotiations are currently underway between CALM and the Shire to allow access to water for Windy Harbour	As above	1(e)
1	40	Water for the Windy Harbour settlement was accessed before the D'Entrecasteaux National Park was created and this historic and future use should be reflected in a robust way in the plan	As above, the content in the draft plan provides sufficient guidance in relation to this issue	2(d)
1	40	Although the draft plan suggests that liaison with the Shire of Manjimup and Water and Rivers Commission (Department of Environment) will occur to ensure that water extraction for Windy Harbour is sustainable and does not impact on park values (on page 132), it does not provide any surety that the existing situation with water provision will continue. Security of the water supply and other services for Windy Harbour is important and the long-term intention of CALM in relation to access for servicing should be detailed in the management plan to provide guidance for future planning of Windy Harbour	As above	2(d)
1	40.2	The draft plan states that the bores for the Windy Harbour water supply are in the D'Entrecasteaux National Park and they are currently not licensed by the Water and Rivers Commission and that the Shire is seeking security of supply. In a following paragraph, the statement is made that permission from the Conservation Commission to access the bores would be necessary even if bores are licensed and this may not be forthcoming. Does this imply that future access for water supply for Windy Harbour may not be forthcoming? This issue needs to be clarified	The paragraph on future use is not referring to Windy Harbour, it is referring to the possible major development of a dam by the Water Corporation. The management plan, draft and final are produced on behalf of the Conservation Commission and they sign off on what is in the plan	2(d)
1	40	Windy Harbour - Water Supplies. You received the easterly side of the Gardner River and the western side from Windy Road to Cliff in return you were to excise the Water Supply from Windy Harbour. This was to be put in writing 20 years ago. What the hell is going on?	The boundary changes to the Windy Harbour reserve were negotiated by the Department and the Shire of Manjimup as part of the 1987 Management Plan. As part of these negotiations the Windy Harbour Reserve was increased by 112 hectares and the continued use of those parts of the D'Entrecasteaux National Park used for supplying water to Windy Harbour was permitted. See page 61 of Management Plan Number 6 1987	2(d), 2(g)
1	40	Part of the agreement to cede Reserve lands from the Manjimup Shire Council in the late 1970s guaranteed Shire access to groundwater near Windy Harbour	As above	2(d), 2(g)
1	40	The final management plan requires amended wording to provide increased long-term security to access water in the National Park and reflect recent decisions from relevant State government agencies. The dilution of the wording in this regard in the draft plan compared to the previous management plan is of concern to us	Wording has not been diluted. However with regard to Windy Harbour's water supply, water extraction has to be sustainable and not impact on the park values, including the nationally important Doggerup Creek wetland system which is adjacent to Windy Harbour	2(d), 2(f), 2(g)
1	40	The draft plan raises no water issues concerning the Shannon National Park	'Water' is in the purpose for D'Entrecasteaux National Park so there is more potential for there to be issues with water extraction for the park's conservation values. There are no known issues for Shannon National Park currently. However, the proposed actions 1, 2 and 4 on page 132 equally apply to the Shannon National Park as described in the draft plan "...the parks..." referring to both Shannon and D'Entrecasteaux National Parks	2(b)
	Part G	Involving the Community		
1	Part G	I hope the community is involved and respected!	Noted	2(a)
1	Part G	Government-sponsored trips could be organised so the public could get involved in species surveys, bird-branding, rehabilitation, education etc	Various methods and strategies will be employed to encourage the public to become involved in conservation management. The public can also be involved in scientific surveys through the Landscape expeditions and through a number of volunteer groups. Contact your local District office for further information	2(a)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
	41	Information, Education and Interpretation		
1	41	Surely this must mean letting people do as they have always done. Go to the coast to camp, fish, 4WD, bushwalk etc. As closing tracks and restricting camping surely doesn't promote the place. What is the point of education of and about the coast if one can't go there and see it?	Camping, fishing, four-wheel driving and bushwalking are allowable	2(g)
2	41	In order to achieve the objective, the first thing CALM must do is to build community trust of the Department. This will never happen as long as CALM continues to promulgate misinformation such as is found in the DMP about Noongar burning of the jarrah forest (pp62-63) and biased and insulting presentations such as the Giblett forest audio script	Noted. The draft plan recognises that there is debate in the community in relation to the extent fire regimes were manipulated by Aboriginal people (page 63). The information in the draft plan is taken from published references as described. The Department is keen to build strong links with the community, unfortunately some conservation strategies will not always align with the aspirations / desires of all sections of the community. Staff have worked with local stakeholders to amend the Giblett forest audio script	2(d), 2(e), 2(g)
2	41	Instead of the Department presenting the misinformation of its choice and the biased views of its forestry component, CALM should ask the community, including those who have worked for decades to save and protect the natural environment of the South-West what it would like to know about the parks. CALM could and should ask for community input before it generates its interpretation and education programs, brochures and displays. Then the community would feel involvement in and ownership of CALM's communication plan for interpreting the parks' values	The Department is responsible for 'sustainable forests' but not the production cycle of timber from state forests. The previous Department of Conservation and Land Management was responsible for forestry from its inception in 1985 until the Forest Products Commission was formed in 2001 The existing interpretation at Shannon was produced in 1985 and will be revised and replaced within the life of this management plan. Community consultation regarding communication and interpretation strategies and projects is carried out by the Department's interpretation officers and others. The degree of consultation varies with the scale of the plan and projects and the degree of interest in the community. The Walpole Wilderness and the Discovery Centre are recent examples of extensive community consultation regarding interpretation. Individuals are most welcome to consult directly with the regional interpretation officer in Manjimup and the Interpretation and Visitor Information Services unit in Perth	2(d)
1	41	P134. Communication strategies formulated to achieve management objectives, i.e. don't advertise the undeveloped, wild sites	Noted, communication strategies will support the management objectives particularly with reference to the wilderness areas, not all sites will be promoted	2(a)
1	41	P134. What about activity specific information e.g. walking, canoeing etc?	Activity specific information will be developed as required through District strategies	1(e)
1	41	P133. 5th Para. Mandalay Beach? Banksia Camp ?	Noted, the plan says more may be identified	2(a)
1	41	Interpretation of scenic drives ? By CD, brochure etc. The Windy Harbour Drive or Pt. D'Entrecasteaux.	Opportunities for further interpretation programs and technologies are under constant examination and review	2(a)
1	41	Produce a larger D'Entrecasteaux brochure as soon as possible. (Shannon National Parks is probably going to be absorbed in a new Walpole Wilderness Brochure). Include in the D'Entrecasteaux brochures: (a) Maps; (b) General fauna/flora/culture notes; (c) Photos of trees, plants and animals for identification purposes; (d) Rules of campfires:- (i) use ring fireplaces only; or (ii) small drum campers provide for themselves, with bricks and firewood for use on beaches only. Take all care, do not collect firewood, extinguish all fires etc. and take all rubbish home. (e) List all 2x2 and 4x4 roads (is Lewis road really 2x2?) Offer 4x4 pump advice; (f) Walks (maybe a separate brochure):- (i) List the 13 walks (p89); (ii) Include walking maps of all walks; (iii) An accurate map is especially important for the Windy Harbour Cliff Top Walk clearly identifying all attractions along the way. Take plenty of water, especially in hot weather. Keep on the tracks and off the vegetation. Take a small magnifying glass to appreciate the flowers, take photos, leave only footprints	Noted. This information is mostly included in the updated "Going to the coast in D'Entrecasteaux National Park" brochure which is available from District and Region offices	2(a), 2(c), 2(d)
1	41	(g) Cycling should also be encouraged along these walking trails - cycling and walking coexist overseas with great success; Encourage walkers to wash their boots and cyclists to wash their wheels to prevent the spread of dieback; (h) Canoeing, list all places of access for canoes and car parking. Explain the safety with the seasons (e.g. Gardner River to the mouth in summer only)	Noted. Cycling and walking on same trail can cause conflict if level of use is high and therefore future development of separate Munda Biddi Trail. It is intended to develop a canoeing brochure in consultation with other groups	2(a)
	42	Working with the Community		
1	42	The local community which the plan impacts most is not consulted to the degree it should. We are expected to (1) fight bushfires, (2) look for lost people but expect to pay when we want to use the park for our own recreation	Noted. Local Departmental staff have organised free passes to members of community groups such as volunteer fire fighters and SES as a 'thank you' gesture for assistance in the past. This will continue into the future and may also have the benefit of encouraging members of the community to join these groups	2(c)
2	42	At all times the community must be completely involved in the management and protection of the areas involved. Help and assistance given by rangers but not overstrick policing	The rangers interact with the community and where necessary they will enforce the management plan and the CALM Regulations	2(c)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
2	42	CALM has always strenuously resisted community involvement in fire management. This must change. A fire management plan for the parks developed by the community in association with CALM would be a good place to start	Community involvement has always been a vital and integral component in fire management. Action 2 on p71 of the draft plan states that the Regional Master Burn Plan will be available for public comment	2(a), 2(g)
1	42	7th July, KOCO conducted a public meeting. Chaired by Paul Omodei. Hugely successful approximately 400 people. CALM representatives very co-operative was very disappointed no other government representative bothered to come, they would have seen how passionate and concerned the public are and also how anti-CALM	Noted	2(c)
1	42	Keep Our Coast Open is an active group of local residents and were requested to attend a meeting at Karri Valley in 1998 in regard to the Shannon and D'Entrecasteaux National Park Draft Plan, which was attended by several members, then prepared a submission. They have had no contact since this could not be regarded as community involvement considering KOCO has over 1000 members	The views of KOCO were communicated to the Department during this initial meeting and also while developing the draft plan through the community advisory committee which had members with strong links to past and present membership of KOCO	2(d)
1	42	We have now been given eight weeks to respond to a Plan that took seven years to compile, this once again does not give the public adequate time to respond because a lot of people like myself find it very difficult to put pen to paper	Eight weeks is the statutory period, the plan was actually open for public comment for 13 weeks	2(d)
1	42	I feel draft plans should be advertised on radio and television, community announcements and local papers	Awareness is raised via advertising in local and state newspapers, media releases to other media and the making available of staff for interviews with radio programs. There were also regular articles in the local newspaper advising of the review and encouraging people to make contact with the Department and have their say	2(d), 2(g)
2	42	Strategy 1: Involvement should not be restricted to local individuals and organisations. The parks serve all Western Australians and indeed all Australians, so participation in conservation and land management programs within the parks should be invited and welcomed from everyone	The Department welcomes involvement from people of all backgrounds especially interstate and international visitors who have an interest in conservation and this is reflected in Action 2 on p136 of the draft plan	2(a)
2	42	Strategy 5: CALM's track record for the formation of 'friends of' groups is not good. For example, membership in the ill-fated 'Friends of D'Entrecasteaux' was by invitation only and the choice of invitees was biased and unfair. 'Friends of' groups should arise from the community and not be artificially created by a government department	You may be referring to "Community Advisory Committees" which are formally created via Ministerial invitation and appointment. The Department has limited resources to encourage and foster "friends of" groups but recognises that it is a key way for the community to express its interest in the parks. It is also recognised that as with all volunteer activities in all communities, effectiveness depends upon the community spirit and capacity to become actively involved in volunteer activities	2(a)
1	42	A simple solution to environmental issues that involve the local community is to form a committee including all parties involved to oversee and manage these issues and ensure that there is minimal disadvantage to all	The Department will encourage the forming of a "friends of" group, however the management plan, Departmental policy and Legislation guide management direction	2(a), 2(e)
2	42	There should be an additional Performance Measure 42.2 "Level of community satisfaction with involvement in management of the parks". Just measuring the number of volunteers and the hours they contribute is an inadequate indicator of effective community involvement	The number of volunteers and volunteer hours contributed is a direct measure of the community satisfaction with involvement in the management of the parks and must therefore be seen as adequate	2(d)
1	42	There are numerous 4WD clubs that use the area as well as commercial enterprises. While the plan was easy to find, the fact that it was on the table appears to have been kept secret. Had it not been for my club involvement I wouldn't have known about it	The draft plan was widely advertised and the WA 4wd Association was represented on the Community Advisory Committee	2(g)
		Part H		
		Monitoring and Implementing the Plan		
1	Part H	To achieve the objectives of this plan millions of dollars will be required. We all know this is not going to happen. The final outcome will be to lock it up then no one will use it. Then fire, vermin, will destroy it	As part of the standard budgeting process, the plan will be used to obtain resources. It is up to the Government to allocate resources based on the business case put up by each Department	2(f)
1	Part H	The absence of appropriate funding to manage National Parks (let along 30 new parks) renders the whole process farcical	As above, also the 30 new parks received separate additional funding	2(f)
1	Part H	Recommend that government allocate significant increase in funds to manage national parks	As above	2(f)
		43		
		Administration		
2	43	The first requirement for achieving proper monitoring and implementation of the plan is adequate funding. This must be vigorously sought by CALM and the Conservation Commission and generously provided by the Government	As above	2(a)
		44		
		Research and Monitoring		
2	44	The objective is not clear. Is it "to increase visitor use"? How does that provide for "better management of the parks"? Or is it "to increase knowledge and understanding of visitor use"? <i>Change wording to "...and of visitor use so as to provide..."</i>	Text will clarify that it is to increase knowledge of visitor use	1(e)
2	44	Reword objective to " <i>... to measure the adequacy and implementation of the mp.</i> "		2(d)
2	44	Strategy 1: *Assessing the threats to the parks by surveying the extent of weeds, feral animals and plant diseases within the parks <u>and the impacts of fire</u> (see sections 19	Impacts of fire will be covered by the Department's specialised fire research programmes as well as in the fire section of the plan	2(a), 2(d)

No. of Submissions	Section	Summary of Comment	Discussion/Action taken	Criteria
		Environmental Weeds, 20 Introduced and Other Problem Animals, 21 Diseases)		
2	44	Strategy 1: *Assessing the impact of fire <u>on flora, fauna, ecological processes</u> , weeds, regeneration and wetlands (see Section 22 Fire). Since insufficient is known about the impact of fire on even common species of flora and fauna, the impact of fire on, and the fire tolerance of, flora and fauna in general must be researched and the results incorporated into the mp	As above	2(a), 2(d)
2	44	Strategy 1: * Identifying <u>the flora</u> within the parks and the minimum fire interval for different areas based on ensuring no extinctions occur (see Section 22 Fire)	By identifying the fire sensitive flora we can ensure fire management regimes and strategies protect most flora	2(a), 2(d)
2	44	Strategy 1: * Determining fire tolerance of rare and priority flora <u>and fauna</u> . (see Section 22 Fire)	This is covered in the next point on habitat requirement of restricted fauna	2(a), 2(d)
2	44	Research and Monitoring. <i>Assessing the impact of fire on weeds. Identifying the fire sensitive flora. Determining fire tolerance of rare and priority flora. Conducting research into the specific habitat requirements.</i> It is not clear whether "Section 22 Fire" provides any guidance or solutions in relation to the above. [Strategy 1, points 4,5,6 + 7 or p137 points 2 + 5	These points are covered in the strategies on page 71 of the draft plan in particular 1, 3, 8 and 9	2(e)

APPENDIX 1 SUBMITTERS TO THE DRAFT PLAN

Individuals (89)

Mr John Austin	Jim & Jenny Love
Jim & Barbara Bachos	Mr Alan Lush
Mr Ian Bradshaw	Mr Guy Milner
Ms Celia Brooke	Mr Ted Middleton
Mr Archer Toby Broughton	Mr Robert S Minchen
J & R Bachos	Mr Shaun Molloy
Tom & Faye Backhouse	Mr W Mackowiak
Mr Neil Bartholomaeus	Mr John McConigley
Mr Peter Bath	Mrs Anne O'Donnell
Mr Ivor Bell	Mr Jack O'Donnell
Ms Joanna Box	Hon. Paul Omodei
Dom & Felicity Bradshaw	Mr Wayne Pedretti
Miss Melissa Cornwell	Mr Brian Perriam
M. J. Chadwick	Carole Perry
Max & Barbara Churchward	Ms Jane Hardy-Pritchard
Mr Terrence James Court	Mr Martin Pritchard
Ms Catherine de Garis	Mr Keith Prosser
Ms Gwyneth Dean	John & Sandra Raynor
Ms Judith Dittmer	Ms Kim Redman
Ms Janet Dufall	Mr David Roberts
Ms Natalie Dillon	Mr Peter Robertson
Mr Gavin Drake	Ms Jillian A Russell
Mr Graham Duncan	Prof Sam Russell
Mrs Colleen Eaton	Mr Craig Ryan
Mr Warren Eaton	Gene, Jo, Jonte & Denver Ryan
Mr John Evans	Ms Maggie Schwann
Mr Graeme Fairclough	Ms Beth Schultz
Ms Kathleen Flockton	Mr Greg Shanhun
Mrs Elona Gade	Mr Phil Shedley
Mr Chris Gade	Mr H Grey-Smith
Mr Greg Giblett	Ms Judy Sutton
Mr Philip J Gravett	Mr John Towie
Ms Derrise Grbavac	Mr David Tuck
Mr Hedley H Green	Mr John Tuck
Mr Ivan Green	Ms Val May
Mr Bruce Guppy	Mr Geoff Veary
Mr Alan Hill	Mr Rosalie Vinicombe
Brian & Yvonne Hornby	Mr Philip Wagner
Mr Mark Hudson	Mr Frederick Wellburn
Mr Brian Hunt	Mrs Lee West
Ms Sonia Hycza	Mr Les Wheatley
Ms Jael Johnson	Mr Rod Whittle
Mr Miles Kennedy	Mr Jim Williamson
Mr Ron Kitson	Mr Ken Wylie
Mr John Kolo	Ms Sally Wylie
Mr Joshua Ledger	

Community Groups/Representative Bodies (23)

Albany Hangliding Club	Mr Simon Shuttleworth	Secretary
Conservation Council of WA	Ms Beth Schultz	Vice President
D'Entrecasteaux Coalition	Mr Andy Russell	
Lower Donnelly Conservation - Donnelly Huts Association Committee	Mr Noel Hartnett	

Environmental Weeds Action Network (WA) Inc.	Ms Diane Matthews	Chair
Federation of West Australian Bushwalkers Inc.	Mr Ian McDonald	Secretary
Fire for Life	Mr Eddie Liddelow	Chairman
IFA - WA Division	Mr David Wettenhall	Chairman
Keep Our Coasts Open (KOCO)	Ms Louise Kingston	Secretary
Margaret River Regional Environment Centre (Inc)	Mr Noel Conway	Coordinator
Northcliffe Visitor Centre	Mr Ken Gwynne	Chairperson
Pemberton APEX	Mr R Whitemarsh	
Recreational Fishing Advisory Committee	Mr Doug Bathgate	Chairperson
RecFishWest	Mr Frank Prokop	Executive Director
South West Forests Defence Foundation	Mr Peter Ewing	Vice President
South West Four Wheel Drive Club	Mr Tim Allot	Secretary
The Bushfire Front Inc	Mr Roger Underwood	Chairman
Warren Horsemen's Club	Mr Wayne Franceschi	
Waterbird Conservation Group, Inc	Mr M Wilson	Secretary
WA Trailriders' Access Rights Coalition	Mr Steve Pretzel	Managing Director
WA Trout & Freshwater Angling Association	Mr Wally Mackowiak	Honorary Secretary
Wetlands International - Oceania	Mr Roger Jaensch	Senior Program Officer
Wilderness Society WA	Ms Rebecca Hubbard	Acting State Coordinator

Businesses/Commercial Organisations (6)

Davies Apiaries	Mr John Davies	
	Mr Matthew Della Franca	
Della's Dairy		
Shannon Horseback Adventures	Mr Kevin Henderson	Proprietor
Plantall Pty Ltd	Mr David Wettenhall	
Wescobee Limited	Mr Edward Planken	Chief Executive Officer
Western Australian Beekeepers Association Inc	Mr Kon Doornbusch	Secretary

Local Government (3)

Shire of Augusta-Margaret River	Dr E Stead-Richardson	Environmental Project Officer
Shire of Manjimup	Mr Vern Mckay	Chief Executive Officer
Shire of Nannup	Mr Shane Collie	Chief Executive Officer

State Government (9)

Department of Industry and Resources	Mr Mike Freeman	Senior Land-Use Planning Geologist
Department of Indigenous Affairs	Ms Monique Pasqua	Senior Heritage Officer
Department of Fisheries	Mr Peter Rogers	Executive Director
Department for Planning and Infrastructure	Mr Greg Martin	Director General
Department of Sport and Recreation	Mr Ron Alexander	Director General
Main Roads Western Australia	Mr Bob Saligari	State Gravel Supply Strategy Manager A/General Manager - Planning and Infrastructure
Water Corporation	Mr Phil Ferguson	Minister for Tourism; Racing and Gaming; Youth; Peel and the South-West
Government of Western Australia	The Hon Mark McGowan	

Internal (8)

Mr Ian Abbott
Mr Roger Armstrong
Mr Malcolm Briggs
Mr Alex Errington
Mr Simon Hancocks
Mr David Meehan

Mr Rod Quartermain
Ms Vicki Winfield

Proformas (935)

910	+2*	912
1	+3*	4
19	+8*	27
5	+3*	8

*These proformas provided additional comments and so have been counted as individual submitters with their additional comments recorded under their submitter number, the remaining proforma comments however remain under the proforma number. Note the column on the left has been used to total the proformas so submitter does not get counted twice.