

MILLSTREAM CHICHESTER NATIONAL PARK AND MUNGAROONA RANGE NATURE RESERVE

Analysis of Public Submissions

to the

Draft Management Plan

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

2008

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1. Introduction

This document is an analysis of public submissions (APS) to the Millstream Chichester National Park and Mungaroona Range Nature Reserve Draft Management Plan (the Plan).

The Plan was released for public comment on Tuesday 30th October 2007 for a period of two and a half months, closing on Friday 11th January 2008. Late submissions were accepted. A total of 30 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) website, from which electronic submissions could be made. Printed copies of the Plan were made available at the Department's offices in Kensington, Karratha, Exmouth and Geraldton and Visitor Centres in the Millstream Chichester National Park and Karijini National Park. The Plan could be inspected at Department's libraries at Woodvale and the City of Geraldton-Greenough Public Library, the Karratha Library, the Pannawonica Public Library, the South Hedland Public Library and the Tom Price Public Library.

2. Numbers of Submissions

A total of 30 submissions were received and these were considered during the APS (Table 4). The comments made in each submission were collated according to the section of the Plan they addressed.

Of all the submissions received, the largest percentage were received from State Government Departments (70%) (Table 1).

Submitters to the *Draft Management Plan for the Millstream Chichester National Park and Mungaroona Range Nature Reserve* are listed in Appendix 1.

Table 1: Number and Origin of Submissions

Category	Number	Percentage
Individuals	1	3.3
State Government	21	70
Local Government	1	3.3
Other Organisations	7	23.3
Total	30	100

3. Analysis of Submissions

Summary of Comments

Most of the public submissions received made comments about a variety of issues. In the first instance, all submissions were collated into a table for analysis (Table 4). Comments were summarised based on what the purpose of the comment was (i.e. supports, concerned, suggests, advises, prefers, congratulated, questions, does not support, applauds, wants, seeks or acknowledges) and what the main point of the comment was.

In total 254 comments were received on the Plan. The greatest number of comments received (28%) were associated with issues to do with the 'Caring for Country: Managing the Natural Environment' (Table 2). 'Caring for Country: Managing Visitors' and 'Caring for Country: Managing Resource Use' were also parts of the Plan that received relatively high numbers of comments (22% and 20% respectively).

Table 2: Number of comments on parts of the draft management plan

Chapter (Part)	Number of Comments
General	32
Part A. Introduction	2
Part B. Management Directions and Purpose	21
Part C. Caring for Country: Managing the Natural Environment	70
Part D. Caring for Country: Managing Our Cultural Heritage	9
Part E. Caring for Country: Managing Visitors	56
Part F. Caring for Country: Managing Resource Use	52
Part G. Caring for Country: Involving the Community	3
Part H. Monitoring and Implementing the Plan	2
Appendices, maps and other parts of the Plan	7
Total	254

In terms of more specific sections of the draft plan, most comments received were for the sections on: Existing and Proposed Tenure; Hydrology and Catchment Protection; Fire; Visitor Access; and Water Extraction.

Table 3: Number of comments on sections of the draft management plan.

Section	Number of Comments
1. Brief Overview	0
2. Regional Context	1
3. Planning Area	0
4. Key Values	0
5. Public Participation	1
6. Vision	4
7. Legislative Framework	1
8. Management Arrangements with Aboriginal People	2
9. Existing and Proposed Tenure	14
10. Management Planning Process	0
11. Performance Assessment	0
12. Biogeography	0
13. Wilderness	1
14. Climate and Climate Change	2
15. Geology, Landforms and Soils	6
16. Hydrology and Catchment Protection	20
17. Native Plants and Plant Communities	3
18. Native Animals and Animal Habitats	4
19. Ecological Communities	0
20. Environmental Weeds	4
21. Introduced and Problem Animals	9
22. Fire	17
23. Indigenous and Non-Indigenous Cultural Heritage	8
24. Indigenous Living Areas	1
25. Visitor Opportunities	4
26. Visitor Access	16
27. Visual Landscape	1
28. Visitor Activities	11
29. Visitor Accommodation	12
30. Commercial Operations	2
31. Visitor Safety	2
32. Domestic Animals	1
33. Indigenous Customary Activities	1
34. Mineral and Petroleum Exploration and Development	7
35. Rehabilitation	0
36. Utilities and Services	4
37. Water Extraction	38
38. Community Education and Interpretation	1
39. Community Involvement and Volunteers	2
40. Administration	0

Section	Number of Comments
41. Research and Monitoring	2
42. Term of the Plan	0
Glossaries	0
References and Personal Communications	0
Appendices	4
Maps	3
General	45
Total	254

Submission Analysis

Each comment on the *Draft Management Plan for the Millstream Chichester National Park and Mungaroona Range Nature Reserve* was analysed according to the process depicted in the flow chart (Figure 1). For each comment, the analysis table (Table 4), was amended with information on:

- ❖ whether or not the point resulted in an amendment to the final plan;
- ❖ the criteria by which each point was assessed; and
- ❖ why the point did not result in an amendment to the final plan, or an indication of what action was taken in the final plan.

Each comment made was assessed using the following criteria:

1. The draft management plan *will* be amended if a submission:
 - a. provides additional information of direct relevance to management;
 - b. provides additional information on affected user groups of direct relevance to management;
 - c. indicates a change in (or clarifies) Government legislation, management commitment or management policy;
 - d. proposes strategies that would better achieve management objectives; or
 - e. indicates omissions, inaccuracies or a lack of clarity.

2. The draft management plan *will not* be amended if a submission:
 - a. clearly supports statements in the plan;
 - b. makes a general statement and no change is sought;
 - c. makes statements already in the plan or were considered during the plan preparation;
 - d. addresses issues beyond the scope of the plan;
 - e. is one amongst several widely divergent viewpoints received on the topic and the strategies of the plan are still considered the best option;
 - f. contributes options that are not feasible (generally due to conflict with existing legislation, Government policy, lack of resource capacity or lack of research knowledge to make decisions);
 - g. was based on unclear or factually incorrect information; or
 - h. provides details that are not appropriate or necessary for inclusion in a document aimed at providing management direction over the long term.

Comments made in 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.

FIGURE 1 - ANALYSIS PROCESS

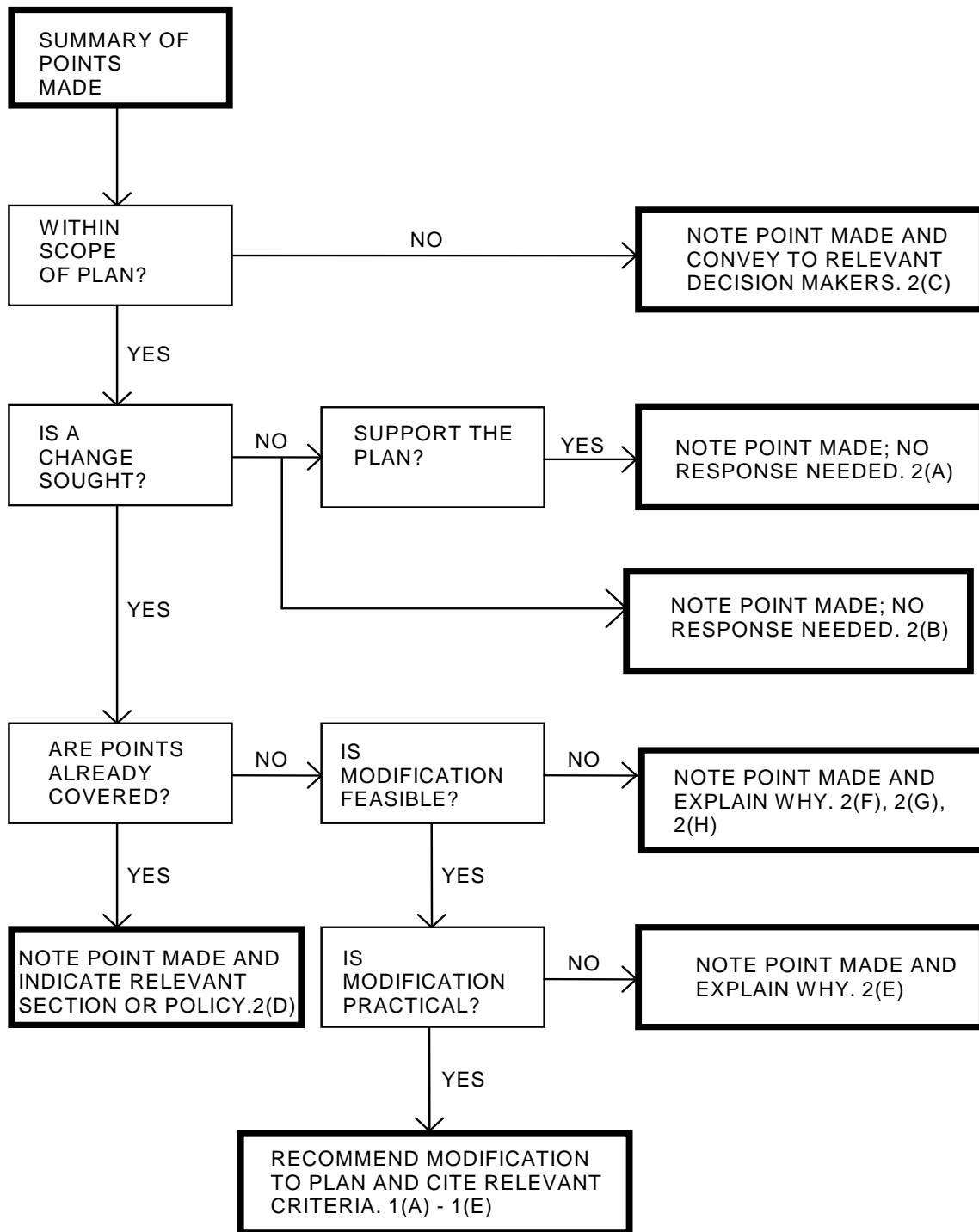


Table 4: Summary of Public Submissions

Comment No	Summary of Comment	Criteria	Discussion/Action taken
GENERAL COMMENTS			
1	Concerned that the approach in developing a management plan based around values and guidelines does not and will not capture the tangible issues confronting the park and reserve, particularly in the near future.	2 (e)	Noted. Comment is one viewpoint and the plan contains the preferred option. Management plans need to be written so they are broad enough to provide meaningful management direction for the 10-year term of the plan. Strategies that are too specific can rapidly become redundant within several years of releasing final plans. Hence plans focus on key values and guidelines. Where appropriate the plan addresses issues confronting the planning area in the near future and this is supported by current day-to-day management.
2	Concerned that the plan sets expectations and outcomes without any commitment to identifying funding or timelines to achieve these.	2 (d)	Noted. Comment addresses issues beyond the scope of the plan. Achievement of the stated objectives depends on the appropriate prioritisation and allocation of available resources, which may change over the term of the plan. Specific projects are planned and costed prior to implementation.
3	Concerned the plan is detailed and technical with information which allows the reader to understand issues buried deep in the document. Suggests the development of a shorter, less technical public version of the management plan.	2 (e)	Noted. Comment is one viewpoint and the plan contains the preferred option. The plan needs to have an appropriate level of background information about policies, theory and, where relevant, history. Management plans do not generally carry subsidiary documents (i.e they are 'stand alone'), and generally, are not dramatically altered between the draft and final plans. In addition, at the end of each section, the boxes containing key points, objectives and strategies describing how the objectives will be achieved provide a summary for readers who do not want to read all the text. There is also a summary of key values, objectives and performance indicators in Appendix 1 of the plan which provides an overview of proposed management in the planning area.
4	Concerned that the plan is difficult to read as it discusses and interweaves regional matters with matters specific to the Millstream Chichester National Park and Mungarooona Range Nature Reserve.	2 (c)	Noted. How the planning area exists within the Pilbara Region is addressed specifically in Section 2 - Regional Context. All strategies proposed in the draft management plan apply specifically to the planning area, unless comment is made about liaison with other stakeholders about the management of adjoining lands. The planning area does not exist in isolation to the region and therefore references to matters which apply to the whole region are inevitable.
5	Concerned that the plan is written from a DEC perspective and glosses over or fails to acknowledge impacts from the surrounding region.	2 (c)	Noted. The plan is written from a DEC perspective as the plan specifically applies to conservation lands vested in the Conservation Commission and managed by the DEC. How the planning area exists within the Pilbara Region is addressed specifically in Section 2 - Regional Context. All strategies proposed in the draft management plan apply specifically to the planning area, unless comment is made about liaison with other stakeholders about the management of adjoining lands. The planning area does not exist in isolation to the region and therefore references to matters which apply to the whole region are inevitable.
6	Concerned that the draft management plan does not pick up on immediate impacts from matters currently being undertaken that will impact on the park and reserve in the mid-near future. E.g the Warlu Way project.	2 (c)	Noted. Comment makes statements already in the plan or was considered during the plan preparation. Where appropriate the plan addresses issues confronting the planning area in the near future and this is supported by current day-to-day management of the planning area.

Comment No	Summary of Comment	Criteria	Discussion/Action taken
7	Asks whether similar management plans have been developed for Karijini National Park and Rudall River (Karlamilyi) National Park. If so, please forward a copy of each and if not, could you please advise when one will be developed.	2 (b)	A management plan exists for Karijini National Park (1999-2009). Currently there is no management plan for Rudall River (Karlamilyi) either completed or in preparation. Preparation of a plan for this national park is a priority list for the Pilbara Region, but resources have not yet been allocated to commence this process.
8	Considers the document is comprehensive with some excellent objectives.	2 (a)	Noted. Comment supports the plan
9	Congratulates the authors on a well researched and written document in which little fault was found. A number of minor omissions were perceived, largely because of my background in this environmental area.	2 (a)	Noted. Comment supports the plan
10	It was easy to obtain a copy of the plan (a copy was mailed to me).	2 (b)	Noted. Comment makes a general statement and no change is sought.
11	The plan was very easy to understand.	2 (a)	Noted. Comment supports the plan
12	The plan did not cover communications.	2 (c)	Noted. Comment makes statements already in the plan or was considered during the plan preparation. Communications are dealt with in Part G. Caring for Country: Involving the Community. In particular, Section 39 - Community Involvement and Volunteers specifically addresses the involvement of neighbouring pastoralists in the management of the planning area and the first strategy in the section states, "Liaising regularly with neighbours adjoining the planning area, particularly regarding fire protection, feral animals and weed control."
13	The plan did not cover pastoral management responsibilities.	2 (d)	Noted. Comment addresses issues beyond the scope of the plan. The plan covers lands vested in or proposed to be vested in the Conservation Commission. No pastoral lands are included in the planning area. Pastoral management is the responsibility of the pastoral lessee with assistance from the Pastoral Lands Board. Throughout the document, the plan identifies issues where liaison is required with pastoral lessees and other neighbours to the planning area, in particular associated with the management of fire, weeds and feral animals.
14	The plan contained sufficient information to draw conclusions.	2 (a)	Noted. Comment supports the plan
15	Throughout the Water Corporation is referred to as a Government Department which is not strictly true.	1 (e)	Noted. Comment indicates omissions, inaccuracies or a lack of clarity. The whole document has been reviewed to remove any references to the Water Corporation as a Government Department.
16	Continues to support the planning and management processes for the reserve areas.	2 (a)	Noted. Comment supports the plan
17	Supports the proposed management plan.	2 (a)	Noted. Comment supports the plan
18	Considers the report to be comprehensive and supports the direction of the Management Plan.	2 (a)	Noted. Comment supports the plan
19	Commends DEC in the development of this management plan.	2 (a)	Noted. Comment supports the plan
20	Disappointed surrounding leaseholders were not given the opportunity to make comment during the preparation of this draft plan. As a result, suggests several issues have been overlooked and not considered in regards to pastoral business.	2 (d)	Noted. Comment is beyond the scope of the plan.

Comment No	Summary of Comment	Criteria	Discussion/Action taken
21	Concerned that pastoral activities are mentioned several times throughout the plan as threats to water quality, contributing to soil erosion and having biodiversity impacts and does not mention how far up or downstream of waterways (eg Fortescue River System) these activities cease to be a threat or how much of a threat they are in the context of all impacts. Concerned that the plan bases statements on pastoral activities in an unfavourable way without acknowledging any positive changes in these activities.	2 (d)	Noted. Comment is beyond the scope of the plan. Managing the impacts of pastoral activities on pastoral leases is the direct responsibility of the pastoral lessee. DEC has the responsibility to ensure that these activities do not impact on the natural and cultural values of the planning area. Many sections throughout the plan have strategies about liaising with neighbours to the planning area (including pastoral lessees) so that activities on these neighbouring lands do not impact on the planning area. Although efforts have been made to reduce the impacts of pastoral activities on the biodiversity values of pastoral properties, DEC will continue to have an interest in managing these impacts on the values of the planning area, however big or small.
22	Concerned that the draft plan reads in a strong DEC perspective with some of the proposals overlooking the impacts to neighbouring stakeholders. Suggests that acknowledging these impacts should be considered and reviewed with improved liaison.	2 (e)	Noted. Comment is one viewpoint and the plan contains the preferred option. The plan is written from a DEC perspective as the plan specifically applies to conservation lands vested in the Conservation Commission and managed by the DEC. Opportunities for liaison with neighbours are identified in many sections of the plan.
23	Suggests that the plan is presented in a simpler, easier to read document for all to understand.	2 (e)	Noted. Comment is one viewpoint and the plan contains the preferred option. The plan needs to have an appropriate level of background information about policies, theory and, where relevant, history. Management plans do not generally carry subsidiary documents (i.e. they are 'stand alone'), and generally, are not dramatically altered between the draft and final plans. In addition, at the end of each section, the boxes containing key points, objectives and strategies describing how the objectives will be achieved provide a summary for readers who do not want to read all the text. There is also a summary of key values, objectives and performance indicators in Appendix 1 of the plan which provides an overview of proposed management in the planning area.
24	The Millstream Chichester National Park is an iconic park in the region with very high cultural, social, environmental and water use values.	2 (b)	Noted. Comment makes a general statement and no change is sought.
25	Suggests the plan is a worthwhile contribution to the sustainable and cultural management of these areas.	2 (a)	Noted. Comment supports the plan
26	Advises that the planning area includes portions of the Millstream Water Reserve and the Harding Dam Catchment Area that are Priority 1 Water Source Protection Areas (WSPA). Under DoW policy, these should be managed to avoid risk to drinking water quality. DoW has prepared Water Source Protection Plans for both Millstream Water Reserve and Harding Dam Catchment Area, which contain a number of recommended protection strategies including some relating to DEC operations.	2 (c)	Noted. Comment makes statements already in the plan or considered during plan preparation. The Millstream Water Reserve Water Source Protection Plan is referred to on pages 44 and 138. Strategy 1 on page 139 refers to the Department complying with the conditions of this plan.
27	Acknowledges that the management plan identifies opportunities for improved joint management of weed, pest and sustainable land management. Suggests that DEC consider the development of a partnership with DoW and Water Corporation to cooperatively address these issues across a larger area.	1 (d)	Noted. Comment proposes strategies that would better achieve management objectives. See discussion associated with comment # 99.

Comment No	Summary of Comment	Criteria	Discussion/Action taken
28	Concerned that the plan does not consider many important issues in detail, particularly the long term development of facilities and how this will be managed within the constraints of being in Water Source Protection Area.	1 (e)	Noted. Comment indicates omissions, inaccuracies or a lack of clarity. A series of principles for managing recreation within P1 areas in the planning area have been included in the introduction to Part E - Caring for Country: Managing Visitors, such as (a) locating proposals for recreation sites downstream of extraction bores, (b) use of non-discharge toilets, (c) hardening high-use sites as required and direction visitors to these sites, (d) encouraging visitors to remove their own rubbish, (e) improving management of fuels and rubbish with the Ranger's quarters and the DEC depot, (f) implementing strategies for more sustainable energy use, (g) upgrading existing visitor facilities, especially toilets, to reduce the risk of contamination, (h) upgrading visitor facilities within the Python Pool precinct to encourage visitors away from P1 areas; and (i) improving education and interpretation about ways visitors can reduce their impact on the Millstream aquifer.
29	Some of the objectives and key performance indicators are outside of the control of DEC.	1 (a)	Noted. Provides additional information of direct relevance to management. Key performance indicators modified where considered outside DEC's control.
30	Suggests that, because the Millstream NP sits within a parcel of lands managed by government agencies for natural resource management outcomes, there are many issues where coordinated management strategies are required. Suggests that DEC consider this, including the potential for agency partnerships and add to the draft plan as appropriate.	1 (d)	Noted. Comment proposes strategies that would better achieve management objectives. Additional strategies relating to agency partnerships added to the plan where appropriate.
31	Commends DEC for providing such a comprehensive fire management section within the draft plan.	2 (a)	Noted. Comment supports the plan
32	Generally supports the plan and its increasing emphasis on recreation access.	2 (a)	Noted. Comment supports the plan
PART A: INTRODUCTION			
1. Brief Overview			
No comments were provided on this section.			
2. Regional Context			
33	Concerned about the statement page 2, second paragraph, "The growth of the mining, petroleum and gas industries in the area...is likely to be associated with increased demands for water for industrial use, which could in turn place <u>greater pressure on water extraction from the Millstream aquifer.</u> " The Water Corporation is undertaking planning studies to cater for future growth beyond its current water allocation of 15GL/annum. It is not anticipated that a request will be made to increase the water allocation from existing sources (Harding reservoir and the Millstream aquifer).	1 (e)	Noted. Noted. Comment indicates omissions, inaccuracies or a lack of clarity. This comment contradicts the point raised by the same submitter in comment #45, where the statement is made that an "increase in demand for potable water is likely and this issue is the greatest economic factor affecting economic development in the region." With increasing populations in the towns of the West Pilbara and industry in the Pilbara expanding at a considerable rate, there will be extra pressure on the Department of Water to increase this allocation. Consequently, the plan needs to acknowledge this extra pressure. This statement changed to, "The growth of the mining, petroleum and gas industries in the area...is likely to be associated with increased demands for water for industrial use, which could place greater pressure on water sources in the Pilbara. This may, in turn, place greater pressure on water extraction from the Millstream aquifer."

Comment No	Summary of Comment	Criteria	Discussion/Action taken
3. Planning Area			
No comments were provided on this section.			
4. Key Values			
No comments were provided on this section.			
5. Public Participation			
34	Congratulates DEC in consulting key stakeholders, including people with disabilities, when planning developments.	2 (a)	Noted. Comment supports the plan
PART B: MANAGEMENT DIRECTIONS AND PURPOSE			
6. Vision			
35	Supports the vision of the draft management plan.	2 (a)	Noted. Comment supports the plan
36	Concerned about the statement in the vision, "This will have been achieved through efforts focused on effective weed control, restoring the resilience of the natural ecosystems and <u>better management of water extraction from the aquifer.</u> " This is an issue between Water Corporation and the Department of Water.	2 (g)	Noted. Comment was based on unclear or factually incorrect information. The Millstream-Harding Consultative Committee manages day-to-day issues associated with water extraction from the aquifer. DEC has representation on this group and therefore has a role to play in the management of this water resource. Consequently, management of water extraction from the aquifer is not solely an issue between the Water Corporation and the Department of Water.
37	Concerned about the statement in the vision, "The significant wetland system, the subterranean aquifer and other natural values of the area will be in better condition than at present." Advises that the aquifer is in excellent condition reflected by the highest ever aquifer levels in December 2005 and it would be difficult to imagine a scenario where aquifer conditions could be improved over its current condition. Associated ecological values can also be linked to other variables as well as hydrology. Suggests that this part of the vision be amended to reflect this.	1 (e)	Noted. Comment indicates omissions, inaccuracies or a lack of clarity. The health of the wetland ecosystem, the Millstream aquifer and other natural values of the planning area are not all linked to the water level of the aquifer. Suggested modification to the vision, "The significant wetland ecosystem and other natural values of the planning area will be in better condition than at present and the subterranean aquifer will remain in its current healthy condition."
38	Concerned about the statement in the vision, "...better management of the aquifer". Supports this statement in principle but suggests that the statement could be interpreted that the current management are not of a suitable standard. Suggest that the word "better" be replaced by the word, "improved" and that it be contexted by a statement that reflects DoW's on-going commitment to improving management i.e. "improved management of water extraction from the aquifer through monitoring, research and adaptive management."	1 (e)	Noted. Comment indicates omissions, inaccuracies or a lack of clarity.
7. Legislative Framework			
39	Suggests that the plan should state that activities within Public Drinking Water Source Areas will be subject to the <i>Country Areas Water Supply Act 1947</i> and associated by-laws.	1 (e)	Noted. Comment indicates omissions, inaccuracies or a lack of clarity.

Comment No	Summary of Comment	Criteria	Discussion/Action taken
8. Management Arrangements with Indigenous People			
40	Congratulates DEC in recognising that Aboriginal people can make a valuable contribution in the future management of the area, which is imbedded in the draft management plan. Congratulates DEC on the outstanding achievement of the joint planning management arrangement with the Millstream Park Council and its desire to encourage training, employment and economic development of the Ngarluma and Yindjibarndi community through recreation and tourism.	2 (a)	Noted. Comment supports the plan
41	Supports the objectives to provide mechanisms for Traditional Owners and Native Title Holders for joint management of the national park and the provision of the plan for cooperative management between traditional custodians and DEC.	2 (a)	Noted. Comment supports the plan
9. Existing and Proposed Tenure			
42	Concerned about the process to excise Firestick Block from Pyramid Station and add it to the Millstream Chichester National Park. Discussions with the owner suggest he was left with little option because of the process followed and advice provided.	2 (g)	Noted. Comment based on unclear or factually incorrect information. Due process for the 2015 exclusion process was followed under the Land Administration Act. Negotiations occurred between DEC and the pastoral lessee and a final boundary was agreed to by both parties.
43	Concern about the proposal to add Langwell Block UCL to the park. Most of Langwell Block, which is located between Pyramid and Mallina Stations is unsuitable for pastoralism. However some parts have reasonable pastoral land and access and use by the owner would be of benefit to his business. Suggests that the pastoral parts of Langwell Block should be given to the owner of Pyramid Station as part of the compensation package for excising Firestick Block.	1 (b)	Noted. Comment provides additional information on affected user groups. The proposal to add Langwell Block to the park will remain in the plan, as its addition to the park will ensure greater protection of a significant area of Roebourne Plans IBRA sub-region. However, an agreement could be developed between DEC and the lessee, for the continued access through the area by the lessee for the movement of stock between the two stations. Section 21 - Introduced and Problem Animals has been modified to reflect this.
44	Concerned that the addition of UCL Langwell Block will block an effective mustering group between Mallina and Pyramid Stations. The north and south of this block is unsuitable for grazing but there is an area in the middle which allows the lessee to move stock from one lease to another. Current lessee Peter Cook suggests this route should be kept open to continue to move cattle between the two stations. Peter Cook has already surrendered Firestick Block which is very productive pastoral land.	1 (b)	Noted. Comment provides additional information on affected user groups. See discussion associated with comment #43.
45	Does not support the proposed additions to the national park and its subsequent expansion. Department of Water and Water Corporation have joint vesting of the majority of land proposed to be added to the MCNP, especially portions of Reserves 38991 and 35798 as they contain operational bore fields specifically set aside to provide potable water to Karratha, Dampier, Roebourne, Wickham and Point Sampson, industries located on the Burrup Peninsula and the Cape Lambert and Dampier Ports. There is likely to be an increase in the demand for potable water and this issue is the greatest factor affecting economic development in the region. The majority of land proposed to be added to the National Park is classified as "Priority 1 - Public Drinking Water Source Areas". Protection of public water supply within these areas outweighs all other considerations associated with the use of this land and should be managed in accordance with risk avoidance. Incorporating this land into the national park could result in an increase in commercial tour operator and visitors to the area, increasing the risk of contamination to the	1 (d)	Noted. Comment proposes strategies that would better achieve management objectives. The proposed reserve additions will remain in the plan, but as areas that will be given further consideration and a decision relating to these proposed additions will be deferred to a later process. The Black Hills block (currently part of Reserve 35798) does not contain any water extraction bores and, not being located near the Millstream aquifer, is unlikely to in the future. The Fish Pool Block should remain for further consideration because (a) this portion of Reserve 38991 does not contain any water extraction bores and does not sit over the top of the Millstream aquifer, (b) the inclusion of this area in the park will provide an important opportunity to control significant weed infestations, especially date palms, (c) the inclusion of this area provides a better management boundary for the park, this being the Tom-Price Railway and the Roebourne-Wittenoom Road, (d) there are no proposals for recreation, visitor facilities or access in this addition, hence there would be no increase in visitors or commercial tour operators over the

Comment No	Summary of Comment	Criteria	Discussion/Action taken
45 (cont')	underground drinking water source. Any re-vesting of these reserves with the Conservation Commission will only constrain the Water Corporation's ability to provide a safe and reliable water source to the West Pilbara.		life of the plan and (e) protection of water quality is an accepted purpose of a national park and the addition of land in a national park will not constrain the protection of water values, but enhance their protection as water values are often one of many values requiring protection. Table 2 changed to show these areas will be considered further. A note has been added to the plan that these proposals were not supported by this submitter.
46	Suggests that the Corporation has vesting of a reserve containing the supply main and access track from the Millstream aquifer, which is reserve 36991 rather than 38991.	2 (h)	Noted. Comment provides details that are not appropriate or necessary for inclusion in a document aimed at providing management direction over the long term. The statement that Reserve 36991, containing the water supply main and the Water Corporation access track, is vested in the Water Corporation is correct. However, the scale of Maps 2 and 4 are not small enough to show this reserve in any detail and most of the smaller reserves are not individually identified. In addition, none of the proposed tenure changes affect Reserve 3699. Consequently, there is no need to make mention of this reserve in the text or Table 2.
47	Concerned about the proposal to manage Palm Springs and Airstrip Blocks under formal Section 16 agreements. The Palm Springs and Airstrip Blocks are in close proximity to Water Corporation's operational assets and access tracks (including 4 x 1000kg chlorine gas storage drums). Dangerous goods buffer and traffic management requirements will restrict public access to roads (particularly Dawson's Creek Rd). In addition, concerns with the increase of vehicles on Water Corporation access roads and associated traffic management requirements during maintenance activities.	1 (d)	Noted. Comment proposes strategies that would better achieve management objectives. The proposed reserve additions will remain in the plan, but as areas that will be given further consideration and a decision relating to these proposed additions will be deferred to a later process. Table 2 changed to show these areas will be considered further. A note has been added to the plan that these proposals were not supported by this submitter.
48	Concerned about the proposal to investigate a more appropriate vesting for the Langwell Block off UCL between Pyramid Station and Mallina Station (leased by Cook family company Pedro Pty. Ltd). Suggests that about a quarter of Langwell Block is of reasonable quality pastoral land and that this should be added to Pyramid Station or remain as UCL and for cattle grazing to be allowed in this area because (a) Pyramid Station is small and pastoralism only viable when run in conjunction with other properties, (b) the excision of Firestick Block from Pyramid Station has reduced the area of grazing country and the addition of part of Langwell Block could be regarded as compensation, (c) the staff of Pyramid Station are well placed to manage vermin, donkeys, camels, feral horses, feral cattle, fire and weed control, (d) the station has a history of conservative stocking and the UCL will be cared for, (e) Langwell Block is landlocked and the only road access is through Pyramid Station. Any visitor access would have to be through the Station which is not desirable as tracks are used to maintain watering points and the Station lessee would be responsible for extra costs of maintenance. Any roads put in by DEC would have to be managed and maintained by DEC or the Shire Council.	1 (b)	Noted. Comment provides additional information on affected user groups. The proposal to add Langwell Block to the park will remain for the reasons raised in the discussion associated with comment #43, although a comment has been added to the plan relating to an agreement to permit stock movement in this area by the lessee. The plan contains no proposals for recreation, visitor facilities or access in this addition; hence there would be no increase in visitors over the life of the plan. Any tracks in this area would be management access only and not available for public use. DEC will be responsible for the maintenance of any existing tracks in this proposed addition (although the pastoral lessee will still be responsible for the maintenance of the portion of track into Langwell Block that pass through either Pyramid or Mallina Stations).
49	Acknowledges that the management plan has a high emphasis on coexistence and suggests this needs to be extended as an option to the surrounding pastoral industry.	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity. The draft plan already contains a number of strategies to liaise with surrounding pastoral lessees and neighbours on a variety of issues. The plan has been reviewed and more strategies associated with this type of liaison have been added.

Comment No	Summary of Comment	Criteria	Discussion/Action taken
50	Suggests that there are successful examples of coexistence between pastoralists and other Government departments and that the management plan needs to address a liaison process and compare costs and management with current arrangements that may be in place.	2 (c)	Noted. Comment makes statements already in the plan or were considered during the plan preparation. This issue is dealt with in Part G. Caring for Country: Involving the Community. In particular, Section 39 - Community Involvement and Volunteers specifically addresses the involvement of neighbouring pastoralists in the management of the planning area and the first strategy in the section states, "Liaising regularly with neighbours adjoining the planning area, particularly regarding fire protection, feral animals and weed control." Specific liaison methods to communicate with pastoralists will be developed as part of the implementation process for the management plan.
51	Suggests an explanation of "by exchange or other means" is required in relation to acquiring other lands adjoining or surrounding the planning area (page 17, strategy 5).	1 (e)	Noted. Comment indicates omissions, inaccuracies or a lack of clarity. Strategy 5 removed. A list of criteria that may be considered in the assessment process for incorporating new lands into the conservation estate added to the text of the plan and strategy 3 modified to state, "using these criteria to assess other proposals for the addition of lands to the planning area that may come to light over the life of the plan."
52	Suggests a proposed addition to the National Park, south of the Millstream Homestead, to the boundary of Reserve 36991 and to a line between the points a) 65m south east from the intersection of Snappy Gum Drive and Reserve 36991, along the boundary of Reserve 36991, and b) 365m south east from the intersection of the north east corner of Reserve 36991 with Reserve 38333, along the boundary of Reserve 36991. Includes a section of the Reserve 38991, vested with the Water Corporation and the Water and Rivers Commission, all of Reserve 24954 (unknown vesting for the purposes of cemetery/conservation) and the portion of Snappy Gum Drive between its intersection with the national park boundary (Reserve 38333) and the boundary of Reserve 36991.	1 (d)	Noted. Comment proposes strategies that would better achieve management objectives. Area added to table 2 and Map 4 for further consideration and that further consultation with Department of Water and Water Corporation is required.
53	Suggests that the area discussed above be added to the national park (as outlined in comment 52 above) because: a) there are graves associated with the homestead in this area which could be proposed as part of a homestead walk, b) the plan proposes that accommodation and service functions of the homestead precinct be relocated so that the homestead precinct can be redeveloped as an integrated visitor complex providing economic opportunities for Aboriginal people (eg art gallery, language centre, retail and commercial opportunities and various accommodation options), c) the proposed national park boundary would be relatively easy to survey, being in a straight line and d) the proposed addition to the national park ensures that the section of Snappy Gum Drive not in a road reserve is within the national park. In order to reduce impacts of the homestead redevelopment on the Millstream aquifer, the most appropriate location for this redevelopment is on the higher ground, on the Water Reserve, beyond the park boundary. Unless the land becomes part of DEC estate, the developments could be compromised as land that is part of a water reserve could not be considered.	1 (d)	Noted. Comment proposes strategies that would better achieve management objectives. See discussion associated with comment # 52 above.
54	Supports the recommendations regarding the proposed addition of Palm Springs Block and Airstrip Block subject to a satisfactory Section 16 Agreement being reached between DEC, Water Corporation and Department of Water as joint managers of Reserve 38991.	2 (a)	Noted. Comment supports the plan

Comment No	Summary of Comment	Criteria	Discussion/Action taken
55	Suggests that Fish Pool Block (which is contained in Reserve 38991) and Black Hills areas (which is contained in Reserve 35798), which are both jointly managed by Water Corporation and Department of Water should be considered for set-off or exchange as suggested by Strategy 5 (page 17). This could be facilitated by the recently established joint DEC-DoW working group.	2 (e)	Noted. Comment is among several divergent viewpoints and the strategies of the plan are still considered the best option, although a decision relating to these proposed additions will be deferred to a later process. See discussion associated with comment number 45. A note will be added to the plan that the support of this submitter is dependent on the priority of these land tenure changes for Department of Water at a State-wide level. Generally DEC and the Conservation Commission do not consider land exchanges. Off-sets are only considered within planning areas, not at a State-wide level.
10. Management Planning Process			
No comments were provided on this section.			
11. Performance Assessment			
No comments were provided on this section.			
PART C: CARING FOR COUNTRY: MANAGING THE NATURAL ENVIRONMENT			
Introduction/General			
56	Agrees that overgrazing is significant threat to the habitat value of grassland communities. However, suggests that, as the reserves are not grazed by domestic stock, this should be of little concern in the plan area.	2 (g)	Noted. Comment based on unclear or factually incorrect information. As outlined in Section 21 - Introduced and Problem Animals, there are populations of feral cattle in gorges within the Chichester Ranges. Cattle also stray from neighbouring pastoral leases into the planning area. Therefore, although the threat of grazing is not as high as what it is on other lands, it is still an issue for the planning area.
57	Advises that the Western Australian Rangelands Monitoring System has assessed rangeland condition across the Pilbara since 1994 and there are 200 monitoring sites in the Pilbara IBRA region. At 80% of these sites, there was no change or an increase in perennial grass frequency (a measure of increased improvement in rangeland condition). Rangeland Condition Assessments conducted on six properties surveyed in 2005/06 reported no decline in rangeland condition.	2 (d)	Noted. Comment is beyond the scope of the management plan. The Western Australian Rangelands Monitoring System (WARMS) monitors sites on pastoral properties located outside of the planning area. Consequently, the result of this monitoring only has limited relevance for the planning area. Even though no decline or an improvement in rangeland condition has been recorded for 80% of properties in the Pilbara, feral cattle are still undesirable in the planning area as they can cause erosion problems, particularly in areas where soils are fragile (such as the riverine environments found in the planning area).
58	Concerned that the economical costs of managing the proposed additions to the national park have not been stated in the plan.	2 (d)	Noted. Comment is beyond the scope of the plan. Achievement of the stated objectives depends on the appropriate prioritisation and allocation of available resources, which may change over the term of the plan. Specific projects are planned and costed prior to implementation.

Comment No	Summary of Comment	Criteria	Discussion/Action taken
59	Concerned that proposed additions are to "square up park boundaries".	1 (e)	Noted. Comment indicates omissions, inaccuracies or a lack of clarity. Generally the following criteria are used to assess lands proposed for addition to the conservation estate. These might include, (a) location - proximity and connectivity to other conservation reserves, (b) size and shape, (c) presence of threatened or priority species and ecological communities, (d) biological and biophysical diversity, and contribution to the CAR system of protected areas, (e) assists in the management of threatening processes impacting on reserve values, such as weeds and feral animals, (f) assists in the resolution of boundary management issues, and (g) compatible land use benefits - protection of soils and catchments, cultural heritage values, recreation values and resource use values. Each of the proposed additions satisfies a number of these criteria, which have been added to the text of the plan.
12. Biogeography			
No comments were provided on this section.			
13. Wilderness			
60	Supports the creation of the proposed wilderness area.	2 (a)	Noted. Comment supports the plan
14. Climate and Climate Change			
61	Agrees with general comments made under this section.	2 (a)	Noted. Comment supports the plan
62	Suggests that one predicted climate change impact for the Pilbara is that cyclones will be of a greater intensity. This may not directly result in increased rainfall as more intense systems may often produce less rainfall. As a result, the possibility of successive years without significant cyclone recharge may increase. This increases the importance of a cooperative agency approach to manage the extraction from the Millstream aquifer and continually monitor and review the aquifer condition.	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity.
15. Geology, Landforms and Soils			
63	Suggests that paragraph 1 of the Geology subsection be changed to, " <u>The planning area is mainly located within the Fortescue Basin of the Pilbara Region (Map 6) which geologically is part of one of the oldest regions in Australia. Rocks of the Fortescue Basin are between 2775 and 2630 million years old that formed when the Earth was very young during the Archaean period. Older rocks underlying the Fortescue Basin belong to the Pilbara Craton which includes rocks as old as 3660 million years.</u> "	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity.
64	Suggests that paragraph 2 of the Geology subsection be changed to, " <u>The base geology of the Chichester Range and the Millstream area is of volcanic origin comprising the Fortescue Group. lower Proterozoic unit which are about 2000 million years old. During this time, the underlying Pilbara Craton was part of a larger continent that began to break apart"..."These eruptions lasted for over 100 million years...."</u>	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity.

Comment No	Summary of Comment	Criteria	Discussion/Action taken
65	Suggests that paragraph 3 of the Geology subsection be changed to, "by 2630 million years ago, the stretching of the Earth's crust and a younger depositional basin, the Hamersley Basin, began to fill with sediments and the deposition of the Brockman Iron Formation which makes up the Hamersley Ranges occurred."	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity.
66	Suggests that paragraph 4 of the Geology subsection be changed to, "Small exposures of the Mara Mamba Iron Formation lie along the southern side of the Fortescue River (<i>Yarnda Nyieeanha</i>). These are younger rocks and were deposited at a time when an immense marine basin formed in the Pilbara and filled with shallow seas, rivers and glaciers, between 2630 million and 560 million years ago. At about this time, the atmosphere changed....resulting in the formation of increasingly sophisticated life forms. Small areas of older Archaean granites of the underlying Pilbara Craton are exposed in the north-eastern section of the Millstream Chichester National Park."	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity.
67	Suggests that paragraph 5 of the Geology subsection be changed to, "They have attracted international attention from researchers, being the oldest known stromatolite examples (up to 3.48 billion years old)..." and "Stromatolites are constructed by cyanobacteria, the earliest forms of life which dominated the fossil record until 1000 million years ago."	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity.
68	Advises that nominated Geoheritage sites are protected by DoIR and it is the responsibility of relevant government agencies (including local government) to protect any sites placed on the Geoheritage register. The process for nominating geoheritage sites is still in draft, but any nominations received are formally assessed and consultation undertaken before being placed on the WA Register of State Geoheritage sites. Suggests that the following should replace the first paragraph on page 34, "A Register of State Geoheritage Sites for Western Australia is being developed. Nominated Geoheritage sites are based upon the recommendations of the Geological Society of Australia, and are defined by the Director of the Geological Survey of Western Australia as, "Geological features considered to be unique and of outstanding value within Western Australia and to have significant scientific and educational values for the good of the community".	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity.
16. Hydrology and Catchment Protection			
69	Advises that the underlying Millstream aquifer is a limestone feature of considerable concern to the water resource professionals in this State. For example, the Department has documented that Crystal Pool in the series of water features along the NP has been supplemented with additional pumped water. Such practices are likely when the aquifer is becoming stressed and being depleted faster than it is being replenished.	1 (a)	Noted. Comment provides additional information of direct relevance to management. Text further emphasising the importance of the Millstream aquifer has been added under the heading "Environmental Water Provisions", page 39.

Comment No	Summary of Comment	Criteria	Discussion/Action taken
70	Concerned about the content of sections 16 and 37 which should be modified to correct misleading statements, remove operational information not relevant to the management plan and include information about strategic water planning being undertaken in the Pilbara Region by Department of Water and Water Corporation. Suggests a meeting between DEC, Department of Water and Water Corporation.	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity. Sections 16 and 37 rewritten, removing operational information and adding information about the Pilbara Water Plan. A meeting was held between Water Corporation, Department of Water and DEC on 14th May 2008.
71	Concerned about comments relating to the Water Corporation's licence acknowledging average draws (page 40, final paragraph). The issued licence does not mention average draws. Licence 105696 states, "Subject to the strategy, the draw of groundwater, pursuant to this licence, when combined with the amount of surface water taken pursuant to licence 105715 shall not exceed a total of 15 000 000 kilolitres per annum without prior approval of the Commission."	2 (e)	Noted. Comment is one viewpoint and the plan contains the preferred option. Advice provided by DoW is that the licence issued to Water Corporation makes reference to the long-term average draw of 6GL/annum and the maximum annual draw of 15GL/annum. These figures provide context for the reader about the current understanding of the sustainable rates of extraction from the Millstream aquifer and should be included in this management plan.
72	Concerned about the statement that EWPs are reviewed in the annual operating strategy (page 40, final paragraph). The West Pilbara Water Resource Management Operation Strategy (WRMOS) contains details of the EWP is not reviewed annually. It is considered inappropriate to include extracts from other documents (eg Appendix 2) as details in these documents may be changed within the life of the management plan. Suggests that the statement is amended through discussion with the Water Corporation. Remove Appendix 2 and refer to the document that contains the EWPs.	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity. Statement that the Environmental Water Provisions (EWPs) are reviewed annually has been removed. Appendix 2 outlining the EWPs has also been removed and summarised in the text in Section 16.
73	Concerned about the statement (page 41 second paragraph), "Between 1981 and 1985 abstraction rates were between 10.5 and 11GL per year. This coincided with tree mortality suggesting that high rates of abstraction did impact on vegetation health." These figures were for water supply only and additional water was abstracted for supplementation. Relating tree mortality purely to abstraction can be misleading as other factors such as rainfall/recharge can also influence vegetation health. Suggests these comments be replaced with "Total abstraction including supplementation during the early 1980s varied between 12 GL and 16GL. Vegetation health can be associated with a number of parameters including abstraction."	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity. Plan amended to include this statement, which now reads, "Vegetation health can be associated with a number of parameters including abstraction. Total abstraction including supplementation during the early 1980s varied between 12 GL and 16GL. Aquifer levels during this time were low, causing flow out of Chinderwarriner Pool to cease. Subsequently, water was also drawn from the aquifer to supplement Chinderwarriner Pool to maintain water flow. This coincided with tree mortality suggesting that high rates of abstraction did impact on vegetation health."
74	Concerned there is no mention of current record aquifer levels (page 41, second paragraph).	2 (c)	Noted. Comment provides details that are not appropriate or necessary for inclusion in a document aimed at providing management direction over the long term. Section 37.2 - Public Water Supply, page 130 contains a discussion of extraction rates from the Millstream aquifer from 2000 to the present and the fact that, due to high rainfall, water from Harding Dam has been used almost exclusively for the West Pilbara Water Supply Scheme. An additional comment about the current record aquifer levels is not required.

Comment No	Summary of Comment	Criteria	Discussion/Action taken
75	Concerned about the statement (page 41, second paragraph), "Should tree mortality and vegetation decline occur, changes will be made to the EWPs to ensure lower rates of extraction." To date, environmental management criteria have been set. The State Water Plan identifies "Pilbara surface and groundwater areas water management plan" as a priority. The Statutory Water Management Plan is schedules for completion over the period 2008-2010. The Corporation anticipates this process will formalise water resource management objectives for the Millstream aquifer and define the framework for future access to this resource (EWPs) giving consideration to ecological, social and economic values.	1 (a)	Noted. Comment provides additional information of direct relevance to management. The Millstream Water Management Plan (1998) is due to be revised and the development of the "Pilbara Water Plan" is currently occurring. As part of both of these processes, EWPs for Millstream will be revised. Consequently this statement has been removed and additional text about the Pilbara Water Plan process has been added.
76	Supports the statement (page 43, third paragraph) that "The 'do-nothing' option is the most viable and cost-effective at this stage." Under certain circumstances natural processes should not be interfered with.	2 (a)	Noted. Comment supports the plan
77	Suggests that strategy 3 (page 44) should be changed from "...minimise groundwater use...." to "...optimise groundwater use in the planning area.". The Millstream aquifer is a valuable water source.	1 (d)	Noted. Proposes strategies that would better achieve management objectives.
78	Suggests that, in relation to the management of wild rivers in the planning area (page 44, strategy 4) the plan outlines ideas for liaison with the pastoral industry and the Pastoral Lands Board.	2 (d)	Noted. Comment is beyond the scope of the plan. The process for implementing this strategy will be developed by the Region and is too specific and detailed to include in a management plan.
79	Supports the intention to nominate the Millstream Pools for listing under the Ramsar Convention.	2 (a)	Noted. Comment supports the plan
80	Suggests that the extraction of 14GL is unlikely to be sustainable (page 40, paragraph 2). The amount able to be extracted from the Millstream Aquifer is strongly related to time since the last recharge event. Aquifer levels decline naturally following recharge events and this rate of decline is exacerbated by abstraction. The greater rate of abstraction, the greater the rate of decline. Welker et al (1998) estimated the ecological water requirement for dependent ecosystems was 11GL per annum. This is provided to the environment so long as aquifer levels remain high enough. Eight monitoring bores across the aquifer calculate a 'mean aquifer level'. A minimum aquifer level, which includes a reserve of 11GL/a for groundwater dependent ecosystems has been calculated. This is used as a minimum level below which no abstraction from the aquifer is permitted. Therefore the annual abstraction limit is not sustainable but is dependent on environmental triggers - this should be clearly stated. This is explained in paragraph 5 of page 40 - suggests a footnote or reference to discussion in paragraph 5 should be included.	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity. Page 40 has been rewritten to provide better clarity.

Comment No	Summary of Comment	Criteria	Discussion/Action taken
81	Advises that EWPs are not reviewed in an annual Operating Strategy (page 40, paragraph 5). Performance of the Water Corporation in complying with the operating strategy and aquifer response to abstraction and recharge events are reviewed in Detailed Annual Statements prepared by Water Corporation as a condition of their licence. Operating Strategies are reviewed on renewal of licences or as otherwise required. Suggests that the management plan should be corrected to reflect this.	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity.
82	Advises that DoW is currently reviewing a revised Operating Strategy for the Millstream Aquifer prepared by the Water Corporation, coinciding with the renewal of their water abstraction licence. Review of the EWPs is part of this revision; however, any changes to EWPs would need to be supported by additional information.	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity. Page 40, paragraph 5 rewritten to reflect this.
83	Advises that DoW is coordinating the development of a numerical model of the Millstream Aquifer (page 41, paragraph 1). The management plan could make reference to the development of this model, which will improve the understanding of the aquifer, its recharge mechanisms, the relationship between aquifer level and discharge and response of the aquifer to abstraction. Together with the monitoring results, this will feed into a review of ecological water requirements for the system and subsequently EWPs and water abstraction management.	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity. Page 41, paragraph 1 rewritten to reflect this.
84	Advises that that the increase in abstraction from Millstream between 2000 and 2004 was due to a drought and water quality issues (page 41, paragraph 2). Decrease in abstraction from 2004 is also a result of an end of a drought period and the filling and maintenance of water levels in the Harding Dam.	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity. Page 41, paragraph 2 rewritten to reflect this.
85	Page 39 states that the EWPs are from Water Authority of Western Australia (1992) and on page 40 that they are summarised from Welker Environmental Consultancy et al. (1998). Suggests that the latter is quoted.	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity.
86	Advises that National Water Commission is funding the Pilbara Water Smart Australia Project, undertaken by DoW. Project investigations include: groundwater and surface water interactions and relationships to dependent ecosystems at several key areas including the Millstream Aquifer. These aim to determine the water regimes required to maintain ecological and cultural values at a low level of risk in a variable climate. Combined with the hydrogeological investigation and assessment (including the development of aquifer models), will support the development of Statutory Water Management Plans for the Pilbara.	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity. Information about the Pilbara Water Smart Project and the Pilbara Water Plan added to the management plan
87	Supports the objectives in this section and suggests they provide a sound approach to integrated protection and management of the area's water resources and groundwater dependent ecosystems. The implementation of these actions is strongly supported.	2 (a)	Noted. Comment supports the plan

Comment No	Summary of Comment	Criteria	Discussion/Action taken
17. Native Plants and Plant Communities			
88	Suggests that the statement that all native flora in WA is protected under the Wildlife Conservation Act (pg 46 the first sentence) be clarified as only flora which is native to WA are protected.	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity.
89	Advises that the statement that WA listings of threatened species under the EPBC Act are incomplete should be replaced with the following explanation. "While threatened species legislation is broadly similar across jurisdictions, there are different approaches to species listing, and therefore inconsistencies exist between State and National threatened species lists. The Australian Government and DEC are currently in partnership to align the threatened species listed under EPBC Act with the flora listed under the Wildlife Conservation Act."	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity.
90	Advises that the name for the aquatic herb <i>Potamogeton javanicus</i> , is no longer current and is now regarded as a taxonomic synonym of <i>Potamogeton octandrus</i> , therefore <i>P. javanicus</i> should be replaced by <i>P. octandrus</i> . This is also the case for <i>Peplidium humifusum</i> which is a taxonomic synonym of <i>Peplidium maritimum</i> .	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity.
18. Native Animals and Habitats			
91	Suggests that the second paragraph of the "Threatened and Other Specially Protected Fauna" subsection be changed to read, "There are two species (the Pilbara olive python [<i>Morelia olivaceae barroni</i>] and the peregrine falcon [<i>Falco peregrinus</i>]) of fauna declared under section 14 (2)(ba) currently recorded for the planning area."	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity.
92	Suggests that the fourth paragraph of the "Threatened and Other Specially Protected Fauna" subsection be changed to read, "Feral predators, namely cats and foxes are the main threat to priority fauna within the planning area."	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity.
93	Suggests deleting footnote 9, "Populations of peregrine falcon are now generally higher in Australia than elsewhere in the world..."	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity.
94	Considers objective for the protection of native fauna and habitats is excellent.	2 (a)	Noted. Comment supports the plan
19. Ecological Communities			
No comments were provided on this section.			
20. Environmental Weeds			
96	Advises that weed species are encouraged in wetlands and suggests that signage should encourage visitors to avoid weeds along paths and roads. Community liaison is a suggested strategy in the draft management plan to address weed management but stops short of any education proposals. Suggests that the community may not always wash and clean cars and declare fruit, but they may learn to go further in time if we push them.	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity. Strategy added, "providing appropriate information and interpretation to visitors and other stakeholders on the adverse impacts of environmental weeds on key values to promote awareness, appreciation and understanding of this management issue."

Comment No	Summary of Comment	Criteria	Discussion/Action taken
97	Supports the integrated management of weeds and pest animals on neighbouring properties as part of coordinated efforts with the Agricultural Protection Boards Pilbara Zone Control Authorities (ZCA) and Rangelands Natural Resource Management Coordinating Group Inc. Future arrangements of ZCA's will change to 'Recognised Biosecurity Groups' under the implementation of the proposed Biosecurity and Agricultural Management Act in mid-late 2008.	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity. Information about ZCA's and Recognised Biosecurity Groups added to text of the plan. Reference to "integrated management" added to strategy 11.
98	Advises that, on pages 57 and 59, Mexican Poppy is not a declared weed in the Pilbara, although it is in many parts of the State.	1 (e)	Noted. Comment indicates omissions, inaccuracies or a lack of clarity.
99	Advises that, since 2005, DoW and DEC have informally collaborated on weed management projects in the MCNP and the adjacent Water Reserve. Suggests this could be undertaken on a more consistent or formal basis, especially for the Fortescue riparian areas and that an integrated approach to weed and pest management would be positive for both agencies. This would also allow both regional offices to share resources, skills and knowledge as well as overcoming staff shortages within each agency. Also help with sharing data and provide a more consistent response to weed and pest management in the MCNP and Millstream Water Reserve. Conducting more frequent weeding trips would also create the opportunity to involve the local community.	1 (e)	Noted. Comment indicates omissions, inaccuracies or a lack of clarity. This suggestion is covered in Strategy 12, page 60. Strategy 12 changed to state, "liaising with other State Government Departments, Local Government, the Water Corporation, landholders, the Pastoral Lands Board, mining companies and the community to facilitate effective coordinated weed management in the planning area and on adjoining lands that ensures integration with relevant management agreements." Although beyond the scope of the plan, the development of a formal agreement for weed management in the planning area and on lands vested in the Department of Water and the Water Corporation is supported by DEC.
21. Introduced and Other Problem Animals			
100	Advises that the camel is a declared species under the Agriculture and Related Resources Protection Act and this needs to be added to Table 4.	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity.
101	Suggests that the first paragraph of the "Declared Species - Foxes and Cats" subsection be changed to "Currently foxes are present in all parts of Western Australia with the exception of the Kimberley and <u>most</u> off-shore islands."	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity.
102	Suggests that the third paragraph of the "Declared Species - Foxes and Cats" subsection be changed to, "As foxes do not <u>currently</u> pose a major threat to fauna in the planning area...".	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity.
103	Suggests that the fifth paragraph of the "Declared Species - Wild Dogs" subsection be changed to, "This occurs in areas where wild dogs are considered to be a problems and baits are dropped up to 10km into inside the boundaries of the Millstream Chichester National Park and along creek lines..."	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity.
104	Supports the integrated management of weeds and pest animals on neighbouring properties as part of coordinated efforts with the Agricultural Protection Board's Pilbara Zone Control Authorities (ZCA) and Rangelands Natural Resource Management Coordinating Group Inc. Future arrangements of ZCA's will change to 'Recognised Biosecurity Groups' under the implementation of the proposed Biosecurity and Agricultural Management Act in mid-late 2008.	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity. Information about ZCA's and Recognised Biosecurity Groups added to text of the plan. Reference to "integrated management" added to strategy 10.

Comment No	Summary of Comment	Criteria	Discussion/Action taken
105	Advises that DAFWA coordinates wild dog control through an agreement with DEC. DEC is still responsible for wild dog control on land which they manage and its impacts on adjoining land through its Good Neighbour Policy and the <i>Agriculture and Related Resources Protection Act 1976</i> .	1 (a)	Noted. Provides additional information of direct relevance to management.
106	Advises that DAFWA now undertakes donkey and horse control on the behalf of landholders at a full cost recovery basis.	1 (a)	Noted. Provides additional information of direct relevance to management.
107	Suggests the use of "grazing buffer zones" bordering pastoral leases, which would allow access for stock which may already graze on the pastoral side and reduce activity that could occur within the park. In relation to the proposed tenure additions, these grazing buffer zones would be small areas of land protruding into the national park and would help ease management and infrastructure costs to DEC. These areas would be most suited to remote areas of the park adjoining pastoral leases. These buffer zones would help minimise costs to both parties in the continual removal and prevention of stock straying into the park. The buffer zone could remain under the current ownership with arrangements in place.	2 (f)	Noted. Comment contributes options that are not feasible. This proposal would see an increase of cattle in the national park, especially in areas adjoining pastoral leases. Cattle have significant impacts on natural areas, including (a) increased grazing pressure on vegetation, (b) increased erosion of fragile soils, particularly around wetlands and rivers, (c) increased sedimentation of wetlands and rivers, (d) increased weed distribution and (e) decreased water quality in wetlands and rivers from fouling. Consequently, DEC does not support such a proposal. The only exception is in Langwell Block where an agreement between the pastoral lessee and DEC is proposed to allow access for the movement of cattle between Pyramid and Mallina Stations (see discussion against comment #43). A description of these impacts added to the discussion about cattle on page 63.
108	Advises that, since 2005, DoW and DEC have informally collaborated on weed management projects in the MCNP and the adjacent Water Reserve. Suggests this could be undertaken on a more consistent or formal basis, especially for the Fortescue riparian areas and that an integrated approach to weed and pest management would be positive for both agencies. This would also allow both regional offices to share resources, skills and knowledge as well as overcoming staff shortages within each agency. Also help with sharing data and provide a more consistent response to weed and pest management in the MCNP and Millstream Water Reserve. Conducting more frequent weeding trips would also create the opportunity to involve the local community.	1 (e)	Noted. Comment indicates omissions, inaccuracies or a lack of clarity. This suggestion is covered in Strategy 10, page 65. Strategy 10 changed to state, "liaising with other State Government Departments, Local Government, the Water Corporation, landholders, the Pastoral Lands Board, mining companies and the community to facilitate effective coordinated control and management of introduced and problem animals in the planning area and on adjoining lands that ensures integration with relevant management agreements." Although beyond the scope of the plan, the development of a formal agreement for pest management in the planning area and on lands vested in the Department of Water and the Water Corporation is supported by DEC.
22. Fire			
109	Concerned that Map 9 shows quite a mosaic of fire that is not supported in the statement (page 66, 1st paragraph) that the planning area has been exposed to large scale wildfires. Suggests that map should also be retitled year of last burn as it only depicts this sliver of the fire history. Prescribed fire has been applied to the area in recent years and suggests that it may be appropriate to refer to this and display it in map form. It may also be useful to mention that even in areas affected by wildfires, there is some form of mosaic resulting - the map suggests that areas affected by fire are uniformly burnt black which is misleading. Also suggests that the first summary point on page 69 is changed to reflect this.	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity. Map 9 removed and comment about past wildfires and prescribed burning creating a mosaic added to first paragraph and first key point.
110	Suggests that page 66 fire ecology section, 2nd para be changed to, "Many of the plant species..... which allow them to persist under a regime of frequent fire".	1 (a)	Noted. Provides additional information of direct relevance to management.

Comment No	Summary of Comment	Criteria	Discussion/Action taken
111	Suggests that page 68, 3rd para is changed to, "A fine grain mosaic is more most appropriate in MCNP however, the use of buffers is an effective risk management strategy that may mimic to some degree traditional practices."	1 (a)	Noted. Provides additional information of direct relevance to management.
112	Suggests that on page 69, the last sentence should be deleted as it does not seem to relate to the rest of the paragraph in relation to wildfire suppression. It would also not be wise to discount the possibility of ground ignition prescribed fire as it is likely it will be used often in the future in these areas.	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity.
113	Suggest that page 69 5th para be changed to, "Further development application of emerging technologies."	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity.
114	Suggest new words - "Integrating fire management with weed control programs in the Millstream delta" (page 70, point 9).	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity.
115	The Performance Measure box indicates a target for the size of intense wildfires below the 2007 levels (page 70. item 22.3). Asks what this level is and any reason why this year was selected. If the largest fire in 2007 was small due to a range of circumstances, setting this target as the max size may be unrealistic. Suggests it may be better to set a size limit, say 50km ² based on biological parameters.	1 (a)	Noted. Provides additional information of direct relevance to management.
116	Refers to the Senate Committee Report: Conserving Australia's National Parks and Marine Protected Areas (April 2007), specifically the recommendation that, "...all governments give greater priority to Indigenous knowledge and participation in park management generally, and fire management in particular." Concerned that the fire management plan (pg 68) could lead to serious effects on the neighbouring pastoral stations if wildlife, fires, vermin and pests are unmanaged.	2 (c)	Noted. Comment makes a statement already in the plan or were considered during the plan preparation. DEC is committed to implementing meaningful joint management with Indigenous people on conservation reserves. This draft management plan provides for the involvement of Yindjibarndi and Ngarluma people in the management of the planning area, especially in fire management, which will be facilitated through the Millstream Park Council. The management plan outlines clear objectives for managing fires and introduced and problem animals and both of these sections have strategies that specifically address liaison with neighbouring pastoral stations on these issues. Far from being unmanaged, it is planned that, at the end of the term of the management plan, these issues are better managed than today.
117	Suggests that last bullet point on page 68 about community interests should refer to neighbouring pastoralists and there should be consultation with pastoralists before fire management plans are drafted.	1 (a)	Noted. Provides additional information of direct relevance to management.
118	Suggests further consultation on the appropriate use of fire within the planning area. Advises of the outcomes of the EcoFire project, an NHT-funded project aimed at reducing the frequency and severity of dry-season fires in the Kimberley by encouraging low intensity fire in the early dry season to develop strategic firebreaks and reduce the risk and impact of large uncontrolled wildfires.	1 (a)	Noted. Provides additional information of direct relevance to management. Added sentence to paragraph 5, page 69. "Further consultation regarding research findings about fire management in spinifex communities and adopting an adaptive management approach will be important." Strategy 8 refers to applying research findings, so no further changes made to this.
119	Suggests that the plan determines the phrase, "burning" by stating the type of fire it covers.	1 (e)	Noted. Comment indicates omissions, inaccuracies or a lack of clarity. The term "burning" generally refers to fire that is used or applied by people to achieve particular management objectives. This definition has been added to the glossary.

Comment No	Summary of Comment	Criteria	Discussion/Action taken
120	Concerned about the use of fire by Indigenous people for "communication, hunting/foraging and to clean up the country" (page 65). This type of burning is not covered in the Ngarluma and Yindjibarndi Native Title determination, handed down by the Federal Court in May 2005, which states, "a right to cook on the land including light a fire for this purpose" and a "right to engage in ritual and ceremony." Suggests that the proposal in the management plan for burning by Indigenous people is outside this decision, does not acknowledge surrounding pastoralists practicing this determination and should be reviewed, based on a wider approach to bring it in line with the determination.	2 (e)	Noted. Comment is one viewpoint and the plan contains the preferred option. DEC provides for all the activities outlined in the Ngarluma and Yindjibarndi Native Title determination in the planning area, as well as other cultural activities, and encourages neighbouring pastoralists to do the same. However, DEC is also committed to implementing meaningful joint management with Indigenous people on conservation reserves. This draft management plan provides for the involvement of Yindjibarndi and Ngarluma people in the management of the planning area, especially in fire management and the use of Indigenous traditional burning, which will be facilitated through the Millstream Park Council. There is no expectation that similar management arrangements will be implemented on pastoral lands surrounding the planning area, although DEC encourages liaison with and involvement of Traditional Owners by pastoral lessees.
121	Supports DEC applying a program of frequent small fires within the vegetation to create a mosaic of varying stages of senescence.	2 (a)	Noted. Comment supports the plan
122	Suggests that within the fire management objectives, there needs to be an increase in the recognition that protection of life and property of neighbours and visitors is a key requirement (eg protection of pastoral stations Coolawanya, Pyramid, Mallina, Mt Welcome, Hooley and others from fires leaving DEC-managed estate).	2 (d)	Noted. Comment addresses issues beyond the scope of the plan. The Department recognises the importance of the protection of life and property of neighbours, which is reflected in strategy 2 and also the new strategy proposed in response to comment 123 below. However, DEC's key responsibility is for fire management on lands vested in the Conservation Commission and this is reflected in the objectives.
123	Requests that DEC formally liaise with FESA in regard to the rolling 'three year-year' indicative burn program, particularly in regard to 'community interest' and 'values at risk'	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity. Reference to FESA added to paragraph 1, pg 69. Added key point, "Liaison with reserve neighbours, the wider community, local government, volunteer bush fire brigades, FESA and other State government agencies will be necessary to ensure effective fire management across jurisdictions." Added strategy, "Continuing to liaise with FESA, local government, local bush fire brigades, neighbouring landholders and other appropriate authorities to encourage cooperative arrangements, ensure community protection from fire is at an appropriate level and to encourage pastoralists adjoining the planning area to implement fire protection measures commensurate with the level of bush fire hazard."
124	Seeks an opportunity to be involved in the planning and proposed burning to ensure the potential for a fire to escape from the DEC estate is minimised.	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity. See discussion against comment 123 above.
125	Suggests that DEC submit a fire management plan to FESA under Section 34 of the Bush Fires Act for these two reserves.	2 (c)	Noted. Comment makes statements already in the plan were considered in the plan preparation. In Section 7 - Legislative Framework, there is the statement, "Under Section 34 (1a)(a) of that Act, the management plan requires approval from FESA."
PART D: CARING FOR COUNTRY: MANAGING OUR CULTURAL HERITAGE			
23. Indigenous and Non-Indigenous Heritage			
126	Supports the objectives and encourages the protection of Indigenous cultural heritage as outlined in the plan.	2 (a)	Noted. Comment supports the plan
127	Acknowledges that any works associated with the plan will comply with the <i>Aboriginal Heritage Act 1972</i>	2 (c)	Noted. Comment makes statements already in the plan were considered in the plan preparation.

Comment No	Summary of Comment	Criteria	Discussion/Action taken
128	Advises that the DIA is willing to provide support and advice relating to heritage matters and the appointment of honorary wardens.	2 (b)	Noted. Comment makes a general statement and no change is sought.
129	Considers that the draft management plan deals extremely well with issues relating to Aboriginal cultural heritage.	2 (a)	Noted. Comment supports the plan
130	Advises that the Millstream Homestead and the Shearers Kitchen, Millstream Station are not on the Register of Heritage Places.	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity.
131	Advises that the Millstream Homestead is listed on Shire of Ashburton's Municipal Inventory	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity.
132	Suggests adding the strategy, "preparing a Conservation Plan to guide the future conservation, interpretation and use of the Millstream homestead and outbuildings."	1 (d)	Noted. Comment proposes strategies that would better achieve management objectives.
133	Suggests adding the strategy, "preparing a strategy to conserve some of the outlying remnants of the pastoral era such as wells, shepherds huts etc, where feasible."	1 (d)	Noted. Comment proposes strategies that would better achieve management objectives.
24. Indigenous Living Areas			
134	Concerned about the statement, "The Department and the Conservation Commission agree in principle to the establishment of residential lease areas for Traditional Owners within the planning area." (page 76) and suggests living areas are not covered in the Ngarluma and Yindjibarndi Native Title determination, handed down by the Federal Court in May 2005, which states, " a right to camp and build shelters (including bough sheds, mias and humpies) and to live temporarily thereon as part of camping or for the purpose of building a shelter". Suggests that the proposal in the management plan for Indigenous living area leases is outside this decision, does not acknowledge surrounding pastoralists practicing this determination and should be reviewed to bring it in line with the determination, to prevent confusion and keep an even playing field over the entire Native Title area.	2 (e)	Noted. Comment is one viewpoint and the plan contains the preferred option. DEC provides for all the activities outlined in the Ngarluma and Yindjibarndi Native Title determination in the planning area, as well as other cultural activities, and encourages neighbouring pastoralists to do the same. However, DEC is also committed to implementing meaningful joint management with Indigenous people on conservation reserves. This draft management plan provides for the aspirations of Yindjibarndi and Ngarluma people in the planning area, especially in their desire to live on country either temporarily or permanently, which will be facilitated through the Millstream Park Council. There is no expectation that similar management arrangements will be implemented on pastoral lands surrounding the planning area, although DEC encourages liaison with and involvement of Traditional Owners by pastoral lessees.
PART E: CARING FOR COUNTRY: MANAGING VISITORS			
Introduction/General			
135	Advises that Tourism WA released the latest update of Australia's North West Tourism, Destination Development Strategy 2007-2017 (DDS) within which the MCNP was identified as an area of iconic significance that requires further development to address the gaps in infrastructure, attractions, accommodation and other tourism facilities to meet current and future market demand.	1 (c)	Noted. Indicates a change in (or clarifies) Government legislation, management commitment or management policy.

Comment No	Summary of Comment	Criteria	Discussion/Action taken
136	Advises that Tourism WA has shown a commitment to supporting and developing new and existing Aboriginal tourism opportunities as outlined in "listening, looking, learning: An Aboriginal Tourism Strategy for Western Australia 2006-2010". The strategy recognises the increasing importance of sustainable Aboriginal participation in the tourism industry and aims for Aboriginal people to have ongoing opportunities to add cultural and commercial value to the WA tourism industry for mutual benefit.	1 (c)	Noted. Indicates a change in (or clarifies) Government legislation, management commitment or management policy.
137	Supports the objectives, particularly those to: (a) Provide opportunities for sustainable nature-based tourism and recreation; (b) Provide opportunities for the development of sustainable Aboriginal tourism; and (c) Provide appropriate infrastructure while ensuring the environmental, heritage, social and cultural values of the area are protected.	2 (a)	Noted. Comment supports the plan
138	Tourism WA is committed to a sustainable tourism industry that exists in harmony with the natural and cultural environment. There are many examples where responsible tourism assists in the protection of natural resources and have provided economic and social benefits to a community. Tourism WA wants to continue to work alongside industry, community and government stakeholders to ensure sustainable outcomes.	2 (b)	Noted. Comment makes a general statement and no change is sought.
139	Concerned that the concurrent development of the proposed Millstream Visitor Services Plan is not occurring or is behind schedule as there has been no consultation with local government.	1 (e)	Noted. Comment indicates omission, inaccuracy or a lack of clarity. The Millstream Visitor Services Plan. It is still being developed and stakeholder involvement is planned but has not yet occurred. The statement on page 79 that it will be prepared in conjunction with this plan has been changed to state that this will be prepared over the life of the plan and will include stakeholder consultation.
140	Suggests that the statement, "New recreational opportunities, facilities and experiences for visitors are required to provide a broader range of opportunities and to take visitors away from culturally and environmentally sensitive areas. Areas degraded by present use will be upgraded by providing new facilities, rehabilitating old ones or a combination of both." needs implementing now. Asks if DEC has the necessary funds for all proposed works.	2 (d)	Noted. Comment is beyond the scope of the plan. Where appropriate the plan addresses issues confronting the planning area now and this is supported by current day-to-day management. Achievement of the stated objectives depends on the appropriate prioritisation and allocation of available resources, which may change over the term of the plan. Specific projects are planned and costed prior to implementation.
141	Suggests clear rules and regulations for visitors on pastoral leases and effective signage and communication of what these rules and regulations are.	2 (d)	Noted. Comment is beyond the scope of the plan. Regulation, signage and communications on pastoral properties are the responsibility of the pastoral lessee. DEC is responsible for regulation, signage, communications and management of lands vested in the Conservation Commission and lands proposed for addition to the national park, once they become vested in the Conservation Commission.

Comment No	Summary of Comment	Criteria	Discussion/Action taken
25. Visitor Opportunities			
142	Suggests that visitor numbers across the Pilbara have been decreasing as a consequence of the lack of transit accommodation and the mining/construction boom consuming all transit accommodation in the region, converting the region to mono-economic mining. Suggests that the Warlu Way Project is specifically designed to redress this issue.	2 (b)	Noted. Makes a general statement and no change is sought.
143	Concerned about increasing visitor numbers to the area and a lack of accommodation in the Pilbara in general will create pressure on the national park.	2 (c)	Noted. Makes statements already in the plan or were considered during plan preparation. Additional camping and built accommodation is proposed in the draft management plan to cater for expected increases in visitor numbers to the national park in the future.
144	Concerned about increasing visitor numbers to the area and a lack of accommodation in the Pilbara in general will create issues associated with trespassing on pastoral land. Pastoralists welcome visitors camping on pastoral leases but effective signage is required where visitors may interrupt pastoral activities. There may also be issues associated with litigation.	2 (d)	Noted. Comment is beyond the scope of the plan. Visitor access and signage on pastoral leases is the responsibility of the pastoral lessee.
145	Advises that Tourism Visitor Centres are often run on a voluntary basis with limited funding from Government. Revenue is often derived from commission of sales from tourism product (accommodation and tours etc) so if a similar arrangement can be made with DEC it is more likely to be acceptable over time and may relieve DEC staff for more specialist tasks.	2 (c)	Noted. Makes statements already in the plan or were considered during plan preparation. Strategy 4 refers to liaising with Visitor Centres regarding the marketing and the provision and exchange of information, which could include the sale of park passes. Many Visitor Centres in the Pilbara already sell park passes and other DEC merchandise and this will continue over the life of the plan.
26. Visitor Access			
146	Congratulates DEC on discussing access requirements of people with disabilities (specifically Part E, starting page 87) and that outcomes are linked to the Disability Services Plan. Advises that this plan has now been superseded the Disability Access and Inclusion Plan (DIAP), developed by DEC in 2007. The DIAP also applies to contractors providing services to the public. Suggests this section is updated to reflect this.	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity.
147	Suggests that the provision of universal access by those providing transport to the park is encouraged.	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity.
148	Suggests that plans for any facilities within the park are commented on by an access consultant to ensure they fully comply with access requirements of the Building Code of Australia and the Disability Discrimination Act. A list of consultants is provided at www.access.asn.au.	2 (d)	Noted. Comment is beyond the scope of the plan, but this will be recommended to Regional staff during the site development planning process.
149	Supports and encourages DEC to continue to work in conjunction with Tourism WA, Australia's North West Tourism and other stakeholders to improve road links between coastal and inland areas into the MCNP to improve access to the park and encourage greater visitation to the area. Seeks to progress the cultural and scenic drive trail, "Warlu Way" in conjunction with DEC and ANW Tourism.	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity. Strategy 5 refers to promoting the "Warlu Way" in conjunction with Tourism WA and Australia's North West Tourism. Wording changed to, "in conjunction with Tourism Western Australia and Australia's North West Tourism, developing and promoting the "Warlu Way" as a cultural and scenic drive trail within the region."

Comment No	Summary of Comment	Criteria	Discussion/Action taken
150	Concerned with DEC's position on the construction of the Karratha-Tom Price Road (pages 2, 80, 85 and 86). The bituminisation of this road has only been approved from the North-West Coastal Highway, along the Pilbara Iron rail access road (Millstream Link Stage 1) which is due to open in April 2008. The State Government has not approved or funded Stage 2 or any other bituminisation work between Karratha and Tom Price and within the Millstream Chichester National Park. Suggests that the management plan provides greater clarity with timelines for funding and construction.	2 (d)	Noted. Comment is beyond the scope of the plan. Environmental approval for the entire project was given by the EPA in January 2005. Timelines for the funding and construction of Stage 3 (which passes through the Millstream Chichester National Park) is the responsibility of Main Roads. Specific construction dates and costs have not yet been determined by Main Roads, but this may occur within the term of the management plan. Consequently proposals for access and the development of other visitor facilities take into account the increased visitation to the park that is likely to occur once Stages 3 and 4 of the road have been constructed.
151	Advises that the proposed bituminisation of the Karratha-Tom Price Road stops 35km short of the main tourist facility near the Millstream Homestead and 20km short of the Python Pool precinct.	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity. Appendix 7 updated to clarify the alignment of the Karratha-Tom Price Road.
152	Suggests that the local government-managed Roebourne-Wittenoom and Millstream-Pannawonica Roads should not be referred to as 2WD accessible roads as they are not all-weather and do not meet AusRoad standards. The roads within the Millstream Homestead precinct are of a similar standard. Concerned that Local Government and DEC do not have funds to upgrade these roads. Suggests that these roads are not referred to as being of any particular standard.	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity. Appendix 7 updated to reflect that where roads are listed as 2WD, it will be indicated that these roads are not all-weather roads. On page 85, the text acknowledges that access routes into the planning area can be closed to both 2WD and 4WDs during the wet season.
153	Concerned that, with improved access to the park as a result of the Millstream Link and the Warlu Way, a greater variety of vehicles will access the park (e.g. motor homes and day visitors in 2WDs) and may not be prepared for the standard of roads currently in the park. Suggests that DEC, in collaboration with ANWT, Tourism WA and local government will need to seek funding to upgrade these roads within and surrounding the park to an appropriate standard for all vehicles.	2 (c)	Noted. Makes statements already in the plan or were considered during plan preparation. Appendix 6 identifies proposals for the Kanjenji-Millstream Rd and the access road to the Deep Reach day-use site will be progressively sealed, providing better 2WD access within the park.
154	Asks who is going to pay for upgrading and maintaining the proposed road to Ngurrawaana Community (pg 86). The Shire of Ashburton estimates it will cost \$590 000 to upgrade this road to 4WD accessible under most conditions. It is assumed that DEC will take the lead role in securing these funds.	1 (e)	Noted. Comment indicates omission inaccuracy or a lack of clarity. The Ngurrawaana Community is keen to upgrade the road between the community and the Karratha-Tom Price Road. Part of this is within the park and part is outside of the park. The Ngurrawaana Community approached the Shire of Ashburton to provide a quote for the cost of this upgrade work and the Shire of Ashburton provided the figure of \$590000. The Ngurrawaana Community proposes to take a lead role in securing these funds and DEC supports the upgrade of this road within the national park. The reference to this road in Table 8, Access Strategy, changed to reflect that this only refers to the part of this road within the national park.
155	Concerned about the addition of the Langwell Block UCL to the park and the issue that the only possible visitor access to Langwell Block is through Pyramid and Mallina Stations. Suggests that the plan identifies only limited visitor access to Langwell Block and that DEC negotiate appropriate access agreements with the owner of Pyramid and Mallina Stations. Suggests that DEC should also fund any necessary road upgrades and on-going maintenance to ensure the station owners are not liable.	1 (b)	Noted. Comment provides additional information on affected user groups. See discussion associated with comment #48.

Comment No	Summary of Comment	Criteria	Discussion/Action taken
156	Does not agree with the assessment of vehicle access on page 85, especially in light of DEC signs at the park entrance about the status of the roads in the park. Local government provides a limited road grading service for roads around the Millstream Homestead which allows for general access not specific 2WD access or all weather access.	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity. Appendix 7 updated to reflect that where roads are listed as 2WD, it will be indicated that these roads are not all-weather roads. On page 85, the text acknowledges that access routes into the planning area can be closed to both 2WD and 4WDs during the wet season.
157	Requests clarification about those who live in Langwell Block which is proposed to be added to the Park, how trespassing will be policed and where people will be permitted to move through pastoral leases.	2 (g)	Noted. Comment based on unclear or factually incorrect information. Currently being UCL, there should not be people living in Langwell Block without a lease from DPI. Currently, no DPI leases exist in the area. Once the block is added to the national park, no visitor access is proposed in this area and this will be managed with signage and a ranger presence. The control of visitors through the adjoining pastoral leases will be the responsibility of the pastoral lessee.
158	There is only limited access between the national park and Langwell Block. Requests that DEC negotiates jointly agreeable access arrangements with lessees of Pyramid Station, Peter Cook. Suggests that DEC should fund road upgrades, on-going maintenance and address any public liability issues.	1 (b)	Noted. Comment provides additional information on affected user groups. See the discussion associated with comments #43 and 48 for issues relating to access to Langwell Block once it has been added to the national park.
159	Concerned about the accessibility of any permits that may be required to access parts of the planning area and suggests that systems are established to ensure the public get the required permits en route to the park if coming by road etc. Suggests that Tourism Visitor Centres act as agents in promoting DEC parks and are able to issue permits and provide limited advice for and on behalf of DEC.	2 (c)	Noted. Makes statements already in the plan or were considered during plan preparation. See discussion associated with comment #145.
160	Supports the sealed road between Karratha and Tom Price which will provide easier access for the public and encourage increased physical activity and recreation in a natural environment. Acknowledges DEC's requirement to provide parking, campgrounds and other facilities in response to the predicted increase in visitation.	2 (a) and 2 (c)	Noted. Comment supports the plan and makes statements already in the plan or were considered during plan preparation.
161	There are no Air Services Australia properties or facilities in the planning area and there is no impact on Air Service's Australia's operation expected from the airstrip adjacent to the National Park, no submission is required.	2 (b)	Noted. Makes a general statement and no change is sought.
27. Visual Landscape			
162	Suggests that the plan highlights what would be classed as 'visual quality impacts' within a pastoral landscape and how these are of concern.	2 (d)	Noted. Comment is beyond the scope of the plan. The Department is concerned with developments that impact on the visual quality in the planning area. Examples in the Millstream Chichester National Park are transport and utility corridors (roads, railways and water pipelines) and recreation developments. Management of visual quality impacts in pastoral areas are the responsibility of the pastoral lessee.

Comment No	Summary of Comment	Criteria	Discussion/Action taken
28. Visitor Activities			
Boating			
163	Supports in principle with the proposed development of a commercial canoe hire operation and canoe trail at Palm Pool. Suggests that further market research be undertaken to determine the demand for and feasibility of this activity and to better enable the size and nature of any operation to be scoped against commercial realities before any tender is let by DEC. Suggests that Tourism WA be considered in a support role for this analysis and participate in any tender development and assessment.	2 (d)	Noted. Comment is beyond the scope of the plan. These recommendations are too detailed to be included in the management plan but will be considered during the feasibility and planning phase for the development of any canoe trails within the planning area.
164	Concerned about the proposal to prohibit all boating at Deep Reach Pool, including canoeing and kayaking and suggests that many families and school groups use the pool for canoeing and kayaking.	2 (e)	Noted. Comment is one viewpoint and the plan contains the preferred option. The management plan proposes no boating at Deep Reach Pool, due to its cultural significance for the Traditional Owners. This was discussed at a Park Council meeting in September 2008 and members confirmed that any form of boating should not be permitted at Deep Reach Pool. The plan outlines alternative sites for boating.
Bushwalking			
165	Supports the further upgrade and development of walk tracks around the Millstream Homestead and Python Pool precincts and the development of Class 4 and 5 walk tracks within the Chichester Ranges.	2 (a)	Noted. Comment supports the plan
166	Advises that in the year ending March 2005, 174 211 visitors to WA undertook a bushwalking experience. According to Tourism WA's Destination Development Strategy, the Outback Adventure experience is ranked as the second highest iconic experience. Tourism WA focuses a big marketing effort on this experience so it is importance that WA's reputation for being able to provide this experience is preserved and enhanced.	2 (a)	Noted. Comment supports the plan
167	Suggests that DEC explores the possibility of tendering to engage an accredited, licenced tour operator to operate guided bushwalking tours in the MCNP in partnership with Traditional Owners.	2 (d)	Noted. Comment is beyond the scope of the plan. These recommendations are too detailed to be included in the management plan but will be considered when commercial tour operators apply to operate within the planning area.
168	Suggests that visitor groups are encouraged to walk/camp from point to point during peak walking periods to enhance visitor experience by minimising contact with other walkers.	1 (e)	Noted. Comment indicates omissions, inaccuracies or a lack of clarity. Remote camping by bushwalkers in the Chichester Ranges is permitted and encouraged and is discussed in Section 29 - Visitor Accommodation - Built Accommodation and Camping. An additional explanation with a cross reference to Section 29 inserted into Section 28.2 - Bushwalking.
Cycling			
169	Supports the recommendation to provide a range of cycling opportunities within the MCNP and suggests that the demand for such adventure activities is further investigated.	2 (c)	Noted. Makes statements already in the plan or were considered during plan preparation. This is part of the strategy, "considering the development of designated cycle trails (either sole or multiple use)..." Part of the planning stage of any visitor infrastructure involves investigation of the feasibility of providing the infrastructure."
170	Suggests that Tourism WA is considered in a support role in the development of cycling opportunities in the planning area.	1 (d)	Noted. Proposes strategies that would better achieve management objectives. An additional strategy added, "consulting with visitors and relevant stakeholders about cycling opportunities."
Day-Use			
171	Agrees there is a need to upgrade or develop new day-use areas within the MCNP.	2 (a)	Noted. Comment supports the plan.

Comment No	Summary of Comment	Criteria	Discussion/Action taken
172	Suggests there is a need for more public toilets, refreshments and signage within the park and that Tourism WA should be consulted in the individual site development planning process within MCNP.	1 (d)	Noted. Proposes strategies that would better achieve management objectives. In various sections within Part E, the plan acknowledges that more refreshments, toilets and signage are required within the park. An additional strategy added, "consulting with visitors and relevant stakeholders about day-use opportunities."
Non-commercial, Education and Not-for-profit Activities			
No comments were provided on this section.			
Recreational Fishing			
No comments were provided on this section.			
Swimming			
173	Advises that the development of bathing pools within the delta area would need to be thoroughly considered by DoW and require approval under the Rights in Water and Irrigation Act (1914) and the Country Areas Water Supply Act (1947). Suggests that DoW be contacted prior to an investigation to discuss these requirements.	2 (d)	Noted. Comment is beyond the scope of the plan. The impact of the development of visitor facilities on specific values within the planning area is too detailed for this management plan. Prior to the development of facilities within the planning area, the Visitor Services plan and site development plans will be prepared. These include detailed assessments of impacts on natural and cultural values, including impacts on water quality and quantity and will include detailed consultation with DoW.
29. Visitor Accommodation			
174	Requests clarification about what financial arrangements and rate payments will apply for those who live in or access the Park.	2 (d)	Noted. Comment is beyond the scope of the plan. Visitors accessing the park are required to pay standard visitor entry fees. (At the time of writing, these are \$10 per vehicle, \$5 per motorcycle and \$4 per passenger on a bus.) In addition, those who camp over night are required to pay camping fees (At the time of writing, these are \$6.50 per adult, \$4.50 per concession and \$2 per child per night). Details about the latest entry and camping fees are available on DEC's website. If any living areas are established in the park, a lease will apply to these areas and payment will be incorporated into the conditions of the lease. National Park Rangers also live within the park, but given that the National Park is vested in the Conservation Commission, Shire rates do not apply.
175	Seeks clarification on the location of the campground on the George River and whether access will be provided through the Shire of Ashburton or the Shire of Roebourne.	1 (d)	Noted. Comment indicates omissions, inaccuracies or a lack of clarity. George River campsite is accessed via a track east of Python Pool, entirely through the national park. The site is informal and usage is currently low and, as proposed in the management plan, this will remain. The location of this camping area will be shown on Map 13.
176	Suggests that DEC will need to make provisions for improving short-stay facilities to cater for the greater diversity of visitors sooner rather than later, especially in light of proposals to close Deep Reach Pool.	2 (c)	Noted. Makes statements already in the plan or were considered during plan preparation. The plan proposes a new camping area at Palm Pool and upgrades to Stargazers Camp and the Milyana Campground to cater for the impacts of closing the Deep Reach Camping area and increases in visitor numbers that is expected with improved access to the park. Over the past two years, upgrading Stargazers Camp and the Milyana Campground has already commenced so there is a greater capacity to accommodate more campers in the park now.
177	Suggests a need for an increased level of sustainable nature-based accommodation with the MCNP.	2 (c)	Noted. Makes statements already in the plan or were considered during plan preparation. The plan proposes upgrades to existing camping areas and the construction of new camping areas and built accommodation.

Comment No	Summary of Comment	Criteria	Discussion/Action taken
178	Suggests that DEC explore the possibility of building huts or basic campsites along proposed remote (Class 4 and 5) long-distance walking trials, which will offer a range of experiences to visitor groups providing choice in the level of security, comfort and challenge sought. Best-practice standards will need to be met to manage the environment and the overall journey. The range of experiences could include: (a) Independent walking using public huts or campsites; (b) Commercial guided walking using public campsites and (c) Commercial guided walking using private huts. Suggests that Tourism WA is consulted in any individual site development planning processes and engaged in any future planning process for Aboriginal tourism product development within MCNP.	1 (d)	Noted. Proposes strategies that would better achieve management objectives. According to the Australian Standard, Class 4-6 walking tracks have only minimal (if any) facilities and emphasis is placed on walkers to be self-reliant (i.e. provide their own equipment for camping). In addition, the plan proposes Classes 4-6 walks predominantly in areas with a natural visitor management setting. In these areas, no facilities are provided and campsites are generally not defined. Visitors camping and bushwalking in these areas are usually attracted by its remote qualities, opportunities for solitude, independence, closeness to nature, tranquillity, self reliance and the limited interaction between users. The construction and maintenance of facilities in such remote locations is also very expensive. Consequently no formal camping facilities or built accommodation will be provided on Classes 4-6 walk trail. An additional strategy added, "consulting with visitors and relevant stakeholders about opportunities for camping and built accommodation."
179	Supports the need to provide new or upgraded camping areas in the MCNP. Existing campsites are unsuitable due to lack of visitor amenities and cultural interpretation.	2 (a)	Noted. Comment supports the plan
180	Supports the development of a registration/booking system for campers and suggests this should be initially introduced for the peak camping period (April-September).	2 (d)	Noted. Comment is beyond the scope of the plan. The plan does not recommend the specifics of how the booking system is implemented. This will be taken into account when planning and implementing a booking system for the park.
181	Supports the proposed development of the Landbank initiative and the text that provides the potential for low impact accommodation in the planning area and suggests that the final plan maintains this approach. The MCNP has been considered for the provision of a Landbank site and that there may be a suitable location in the planning area for a low impact accommodation development that would provide a high quality local and regional asset and contribute to other regional tourism initiatives such as the Warlu Way. It would also provide the potential for Aboriginal tourism outcomes and provide experiences that showcase local culture and the environment.	2 (a)	Noted. Comment supports the plan
182	Suggests that the following paragraph replaces paragraphs two and three of "Built Accommodation" on page 106, "The Millstream Chichester National Park is being considered as part of a wider State Government initiative called Landbank. The Landbank project involves detailed environmental, social and economic studies of areas that could potentially contribute to the supply of accommodation sites to meet future tourism industry needs in Western Australia. These needs vary across the State. Whereas in the Perth area industry needs include the requirement for luxury resorts, in regional areas they are more likely to be for lodges, motels, caravan parks and other budget accommodation. The ultimate aim of Landbank is to provide different types of tourist accommodation appropriate to the areas in proximity to the some of the State's most iconic tourism locations and landmarks."	1 (a)	Noted. Provides additional information of direct relevance to management. Plan has been amended to include this information. However, five paragraphs about Landbank is too detailed and this information has been summarised into two paragraphs.

Comment No	Summary of Comment	Criteria	Discussion/Action taken
182 (cont')	<p>"Part of the Landbank project involves carefully examining prospects for lower impact visitor accommodation within Department-managed estate across Western Australia. One of the project aims is to achieve a spread of high-quality eco-tourism ventures that will expand the range of visitor experiences and help to establish the State's credentials as a nature-based and cultural tourism destination. It will allow tourists to stay near some of the State's best attractions, providing heightened appreciation of Western Australia's varied environmental and cultural assets. Tourism opportunities within Department-managed estate have special significance for remote area Aboriginal populations and this initiative is consistent with the Government's commitment to include Aboriginal people in the management of and to gain benefits from land to which they have a connection."</p> <p>"Landbank is a State Government Project led by Tourism WA. On Department-managed estate the project is driven in partnership with DEC. The Millstream Chichester National Park presents considerable potential for improved visitor facilities and infrastructure, including low impact experiential style accommodation that would help nurture appreciation of the area's natural and cultural values. Low impact accommodation in this area would provide opportunities for the tourism industry to demonstrate its commitment to sustainable technologies, which in turn could establish Western Australia and, in particular, the Pilbara as a leading provider of nature based, sustainable tourism ventures."</p> <p>"Early investigations suggest that although there is potential for accommodation at Millstream Chichester National Park, there is still considerable work to be done. Further analysis will help to determine the type of low impact accommodation best suited to the areas and will place this type of facility in the context of other initiatives like the Warlu Way. Should the location be deemed suitable for visitor accommodation, more intensive localised studies such as environmental and feasibility analyses will need to be carried out. Consultation with stakeholder groups will be a key ingredient to further analysis."</p> <p>"The Millstream Chichester Park Council will be integrally involved in these investigations and in any resulting accommodation facilities that may be established. There will be a wide range of opportunities to partner or to lead in commercial development and in a wide range of activities that will ultimately enhance the experience of visitors to the area. Cultural experiences and Indigenous interpretation of country are highly regarded by both international and domestic visitors to Department-managed estate."</p>		

Comment No	Summary of Comment	Criteria	Discussion/Action taken
183	Acknowledges that the Pilbara Region lacks Indigenous product, especially a lack of Indigenous run accommodation and Aboriginal tour guides. Across the Pilbara, there is a need to increase and develop Indigenous tourism, especially tour product and infrastructure, including accommodation, cultural walk and heritage trails and interpretive centres. The Tourism WA's Destination Development Strategy identifies the establishment of cultural tours, including an artist-in-residence program, a language centre at MCNP and supports the outcomes of the recent "Stepping Stones" program held at Millstream. Tourism WA's Aboriginal Tourism Strategy for Western Australia objective's state: (a) Build and maintain an effective relationship with public and private sector investment capital providers; (b) Review and develop assistance programs that support Aboriginal people to participate in the tourism industry; (c) Provide business advice to start-up and existing Aboriginal tourism businesses advisory support bodies; and (d) Promote joint venturing opportunities in target areas.	1 (e)	Noted. Comment indicates omissions, inaccuracies or a lack of clarity. This is covered in Section 30 - Commercial Operations, where the first strategy is, "giving due consideration to the interests and aspirations of the Traditional Owners and encouraging Indigenous commercial activities", which encompasses the provision of accommodation and tours by Aboriginal people. Extra text added to describe the content of Tourism WA's Destination Development Strategy and Aboriginal Tourism Strategy for Western Australia.
184	Suggest that DEC engage Tourism WA in any future planning processes for Aboriginal tourism product development with MCNP	1 (d)	Noted. Proposes strategies that would better achieve management objectives. An additional strategy added, "consulting with visitors and relevant stakeholders about commercial opportunities."
185	Suggests that a discussion about the harvesting of sandalwood and local craftwood by Indigenous people to make traditional artefacts (for commercial gain) be added to this section. The opportunity for Indigenous people to harvest forest produce in the national park, nature reserve and proposed additions has not been clarified and should be dealt with in this section.	1 (e)	Noted. Indicates omissions, inaccuracies or a lack of clarity. This section applies to Commercial Operations associated with Visitor Use. Section 33 - Indigenous Customary Activities updated to reflect this.
30. Commercial Operations			
186	Suggests that DEC engages Tourism WA in any future planning process for Aboriginal tourism product development within MCNP and is represented on the panel that develops and lets any tenders associated with this.	1 (d)	Noted. Proposes strategies that would better achieve management objectives. An additional strategy added, "consulting with visitors and relevant stakeholders about commercial opportunities." Details about the process used to develop and let tenders associated with commercial operations is too specific for the management plan. Tourism WA will be consulted in the planning and development of any tenders associated with Aboriginal tourism product in the planning area.
187	Concerned about the strategy, "Providing training and other support to enable Traditional Owners to meet service expectations and associated tourism operations." Questions whether the plan expects DEC to do this.	1 (d)	Noted. Proposes strategies that would better achieve management objectives. Changed strategy 1 to "giving due consideration to the interests and aspirations of Traditional Owners in the development of Indigenous commercial operations and encouraging appropriate Indigenous commercial initiatives." Strategy 5 deleted.
31. Visitor Safety			
188	Concerned that the safety of visitors in the Park and surrounding areas is not adequately addressed. Visitor safety is acknowledged on pages 79 and 115 and it is likely to be a major concern over the coming years as outlined in this section, but is not identified as a Key Value.	2 (c)	Noted. Comment makes statement already in the plan or were considered during the plan preparation. Key values are qualities of the planning area itself, which contributes to its importance as a protected area and are the major focus of the management plan. Values are grouped according to whether they are natural, cultural, recreational, commercial, educational and research or community values. Visitor safety is not a value of the planning area, but rather an issue and is dealt with specifically in Section 31 - Visitor Safety. In addition, Section 28 - Visitor Activities and the specific subsections about particular activities all emphasise providing for these activities safely.

Comment No	Summary of Comment	Criteria	Discussion/Action taken
189	Acknowledges that the plan identifies lack of communication as a safety issue. However, concerned that the plan has not identified the simple but effective act of installing Telstra mobile phone coverage to resolve all communication problems and requests that DEC immediately enter into negotiations with Telstra for the provision of adequate coverage in all National Parks within the Pilbara.	2 (c)	Noted. Comment makes statements already in the plan or was considered during plan preparation. The strategy, "investigating methods for improved emergency communication within the planning area." takes into account a range of communication methods which could be investigated, which includes improved mobile phone coverage, but also the use of satellite phones and UHF radios. Many parks within the Pilbara are very remote and to provide mobile phone coverage to these areas where resident populations are very low would be very expensive and unlikely to be a priority for Telstra. Implementation of this strategy will include liaison with Telstra about mobile phone coverage within the planning area.
32. Domestic Animals			
190	Acknowledges that taking domestic animals to the Park should be discouraged but concerned about the parks isolation from Karratha, Tom Price and Pannawonica and the limited availability of kennels in the region. Long-term separation of pets with their owners may be distressing for both owners and pets and companionship provided by pets is needed for the owner's well-being. Suggests that DEC consider establishing kennels within the park, close to camping grounds.	2 (f)	Noted. Comment contributes options that are not feasible. The plan provides four reasons why dogs should not be taken into national parks (including kennelling facilities) and the activity is not consistent with the park values.
PART F: CARING FOR COUNTRY: MANAGING RESOURCE USE			
Introduction/General			
191	To date, there has never been apiary site permits granted in the Millstream Chichester National Park or the Mungarooona Range Nature Reserve. Suggests that a section to be placed in the final management plan such as, "To be consistent with the criteria for assessing apiary sites in conservation areas as there has been no record of beekeepers using this land, "no beekeeping" is to occur on these lands". If the industry can, however provide proof that they used to work this land, then a full assessment should be conducted to ascertain whether beekeeping could still occur on these lands.	1 (e)	Noted. Comment indicates omissions, inaccuracies or a lack of clarity. Plan amended to include a section about beekeeping.
192	Suggest that, unless beekeepers make a submission wanting to have apiary sites in these areas, the apiary criteria do not need to be applied over this area. Due to there being no known prior history of use over this area by beekeepers, the Apiary Section would continue to support no beekeeping in these conservation areas. Also at present the Department is no accepting any new apiary site applications in the DEC Pilbara Region due to the problems already occurring up there with feral bees.	1 (e)	Noted. Comment indicates omissions, inaccuracies or a lack of clarity. See discussion associated with comment # 190.
33. Indigenous Customary Activities			
193	Suggests that a discussion about the harvesting of sandalwood and local craftwood by Indigenous people to make traditional artefacts (for commercial gain) be added to this section. The opportunity for Indigenous people to harvest forest produce in the national park, nature reserve and proposed additions has not been clarified and should be dealt with in this section.	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity. Under the Wildlife Conservation Act, the harvesting of sandalwood and local craftwood by Aboriginal people for commercial gain is not permitted in conservation estate. Paragraph 3, page 123 modified to, "As such, Indigenous people seeking to engage in food gathering in the planning area, including for ceremonial or demonstration purposes (but not for commercial gain), must obtain prior, general consent from the Department."

Comment No	Summary of Comment	Criteria	Discussion/Action taken
34. Mineral and Petroleum Exploration and Development			
194	Suggests that the plan makes a statement about Fly-in/Fly-out camps associated with any mining activity being undertaken within the Millstream Chichester National Park.	2 (d)	Noted. Comment addresses issues beyond the scope of the plan. 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. Any new mining proposals (including proposals to establish fly-in, fly-out camps associated with any proposed mining operation) would be subject to an Environmental Review and Management Programme (prepared by the proponent and EPA) and requires Ministerial approval.
195	Suggests the plan makes a statement about mine de-watering activities that might be undertaken upstream of the Park.	2 (d)	Noted. Comment addresses issues beyond the scope of the plan. DEC is unable to control activities that occur outside the planning area on lands not vested in the Conservation Commission. Any new mining proposal (including de-watering activities) within or outside the planning area will be subject to an Environmental Review and Management Programme (prepared by the proponent and EPA) and requires Ministerial approval.
196	Advises that no economic resources have been found in the planning area, including the proposed additions to date. Regarding prospectivity, the exploration effort reported by Lipple (1996) for uranium-gold and iron-ore was not actually carried out in the planning area, although there is potential for these types of deposits, due to: (a) the large area to explore to determine the prospectivity of the deposits; (b) the changing (and improving) economics; and (c) improved exploration technologies.	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity.
197	Advises that prospectivity for the proposed additions is as follows: (a) Langwell Block - prospective for uranium and/or gold and entirely covered by exploration licence applications, (b) Firestick Block - prospective for uranium-gold mineralisation and entirely covered by exploration licence applications, (c) Black Hills area - prospective for uranium-gold mineralisation and entirely covered by an exploration licence application by De Beers, (d) Palm Springs Block - prospective for copper and iron-ore and covered by exploration licence applications by De Beers, (e) Airstrip Block - potential for iron ore and covered by a exploration licence application De Beers and a tenement application by FMG, (f) Fish Pool Block - prospective for copper, iron ore and the most prospective area for diamonds and covered mostly by granted exploration licences held by De Beers, (g) Reserves 5510 and 5511 prospective for copper and iron-ore and covered by granted exploration licences held by De Beers and (H) Camp Curlew - has low prospectivity.	2 (d)	Noted. Comment addresses issues beyond the scope of the plan. This information is too detailed for the management plan. General comments about prospectivity in the planning area, according to information provided in comment # 198, added to the management plan.

Comment No	Summary of Comment	Criteria	Discussion/Action taken
198	Suggests that the first paragraph of the Mineral Resources and Prospectivity subsection on page 122 be reworded as follows, "The planning area covers mostly Archaean Fortescue Group basalt and sandstone and minor Hamersley group iron formation. In the late 1960s to early 1980s substantial explorations was undertaken for uranium-gold mineralisation in the sandstone and conglomerate of the Hardey Formation. This area is located at the base of the Fortescue Group, mainly to the north of the Millstream Chichester National Park and along the outer scarps of the Chichester and Mungaroona Ranges. Although no substantial uranium-gold mineralisation was found anomalous uranium has been recorded, and there is currently renewed interest in this exploration target."	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity.
199	"Substantial exploration for iron-ore occurred in the Marra Mamba Iron Formation at the base of the Hamersley Group, which is exposed in the south-western part of the Millstream Chichester National Park, and for concealed Tertiary Robe Pisolith in the Fortescue Valley. No economically viable deposits were identified, nevertheless, future potential remains, particularly for the discovery of large deposits of pisolith ore (Ruddock 1999) mainly to the south of the planning area. The planning area is also prospective for copper and gold within the Fortescue Group (Lipple 1996) and for diamonds (Ruddock 1999)". Additional reference, Ruddock, I 1999, Mineral occurrences and exploration potential of the west Pilbara: Geological Survey Western Australia Report 70.	1 (e)	Noted. Indicates omissions, inaccuracies or a lack of clarity.
200	Table 8, page 123. There are considerably more mining tenements over the planning area. The Mungaroona Range Nature Reserve is completely covered by tenement applications. There are currently 34 exploration licences within the Millstream Chichester National Park and Mungaroona Range Nature Reserve and four Miscellaneous Licences have been granted and one applied for along the rail corridor through the Park as per the Iron Ore (Robe River) Agreement Act 1964. Specific details of tenements within the planning area are provided. Suggests that Table 8 be updated with details provided.	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity.
35. Rehabilitation			
No comments were provided on this section.			
36. Utilities and Services			
201	Advises that, in Paragraph 3, page 127, the correct reference is the "Hamersley Iron railway line". Pilbara Iron is engaged by Hamersley Iron to manage the railway infrastructure.	1 (e)	Noted. Comment indicates omission, inaccuracies or a lack of clarity.

Comment No	Summary of Comment	Criteria	Discussion/Action taken
202	Suggests the addition of text relating to Action Item 7, page 128 to clarify offset requirements, which are applied as conditions of environmental approval under the Environmental Protection Act 1986 (EP Act) and need to be consistent with the EPA's Position Statement No. 9 and Draft Guidance Statement No. 19. This is the only appropriate forum for seeking environmental offsets and offset packages can only be enforced through conditions on new activities requiring approval under the EP Act and cannot be retrospectively enforced on approved and existing infrastructure works.	1 (e)	Noted. Comment indicates omission, inaccuracies or a lack of clarity. The following text inserted into Section 34 - Mineral and Petroleum Exploration and Development, "In 2006 the EPA released Position Statement No. 9 <i>Environmental Offsets</i> (EPA 2006). Should mining or petroleum tenements be approved in proposed conservation estate, these should be subject to the principle of environmental offsets. In addition, it is the Department's position that the costs of rehabilitating mining and petroleum activities should be borne by the organisations responsible for the activity.", with the footnote, " Environmental offsets aim to ensure that significant and unavoidable environmental impacts are counterbalanced by a positive environmental gain, with a goal of achieving a 'net environmental benefit' (EPA 2004)". A cross-reference to this text inserted into Section 36 - Utilities and Services.
203	Suggests that action item 7, page 123 be amended to state, "If appropriate under the EPA Draft Guidance on Environmental Offsets, seeking...offsets as conditions of environmental approval to counterbalance any residual environmental impact from the installation/maintenance of public utilities". Action Item 7 should also refer to direct and contributing offsets, rather than "direct and complementary offsets to be consistent with the terminology used in the EPA's Position and Draft Guidance Statements.	1 (e)	Noted. Comment indicates omission, inaccuracies or a lack of clarity. Strategy 7 changed to reflect new wording. A similar strategy in Section 34 - Mineral and Petroleum Exploration and Development also amended to reflect this.
204	Suggests the importance of liaison with pastoralists in relation to any requests made by DEC to utility and service providers regarding the location of utilities and services outside the planning area. It may not be environmentally or economically sustainable to use pastoral land just for the sake of bypassing the planning area.	2 (c)	Noted. Comment makes statements already in the plan or was considered during plan preparation. This comment is encompassed in strategy 1 that states that, "where possible, liaison with utility and service providers to locate utility and services outside the planning area in areas <u>where impacts are minimised and permitting new utilities within the planning area where there are no viable alternatives</u> and where they are consistent with the protection of the key values of the planning area..". In cases where it may not be possible to place utilities and services on pastoral leases, placing them in the planning area will be considered.
37. Water Extraction			
205	Concerned that there is no consistency between this management plan and the Regional Water Plan being developed by the Department of Water and the outcome of the Economic and Industry Steering Committee's Inquiry into Water Licencing and Services and similar initiatives.	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity. Information about the Pilbara Water Plan added to the management plan. The Economic and Industry Steering Committee's Inquiry into Water Licencing and Services does not have anything to do with the management of water extraction from the Millstream aquifer.
206	Suggest that the plan acknowledges the Regional Water Plan and the outcome of the Economics and Industry Standing Committee's Inquiry into Water Licencing and Services	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity. See discussion associated with comment # 204 above.
207	Suggests that the plan needs to discuss sewerage discharge and the location and licencing of landfill sites and the impacts of these on water quality and the environment.	2 (c)	Noted. Comment makes statements already in the plan or was considered during plan preparation. The management of toilets is discussed in Section 28.4 - Day-Use Sites and these are managed according to conditions and criteria outlined for protecting P1 Drinking Water Sources as outlined in the "Millstream Water Source Protection Plan (MWSPP)" (also referred to in Section 37.3 - Water Quality Protection). In line with the MWSPP, no sewerage discharge occurs within the planning area. Similarly, rubbish removal is discussed in Section 28.4 - Day-Use Sites, which proposes that visitors will be encouraged to take their rubbish home, hence eliminating the need for landfill sites.

Comment No	Summary of Comment	Criteria	Discussion/Action taken
208	Acknowledges that the construction of the Harding Dam has spared the Millstream aquifer of demand for a period. Suggests there is capacity to fully describe the aquifer in storage characteristics, its likely sustainable usage rates and the initiation of coastal mineral industry projects, the greater demands from the population in general and the climate change issue leads to fears of return to a substantial supplementation pumping program. Suggests that impoundments of the Fortescue River, upstream of the planning area may be able to improve recharge and store valuable water from cyclones. This has been proposed to protect the Carnarvon Horticultural Area from the Gascoyne River flooding by a broad temporary lake being held back in the Gascoyne Junction area.	2 (h)	Noted. Comment provides details that are not appropriate or necessary for inclusion in a document aimed at providing management direction over the long term. This information is too detailed for the management plan. Detail about coastal mining projects can be found in the "Pilbara Coastal Region Study", developed by DoW.
209	Suggests that the experience of the previous pumping need examination, such as the influences of pumped groundwater and variations in water quality on aquatic species, the influences of plant communities in riparian receiving areas and where the water was drawn from and potential impacts on stygofauna. Suggests that stygofauna assessments and monitoring is also carried out, similar to the monitoring schemes that are carried out by mining companies.	2 (h)	Noted. Comment provides details that are not appropriate or necessary for inclusion in a document aimed at providing management direction over the long term. This information is too detailed for the management plan.
210	Suggests that water monitoring is implemented following major changes to vehicle and visitor numbers in the planning area, especially water turbidity, particularly following the first rainfall event after these changes. Suggests that aesthetics and fin-fish diversity in the Fortescue River is closely linked to clear water.	2 (h)	Noted. Comment provides details that are not appropriate or necessary for inclusion in a document aimed at providing management direction over the long term. This information is too detailed for the management plan.
211	Asks what are the benefits and costs of the planned water arrangements for the National Park upon pastoral leases and the long term incurred water costs.	2 (b)	Noted. Comment makes a general statement and no change is sought. The plan does not propose any changes to the current water management and associated water costs. Charges for water use are the responsibility of the Water Corporation.
212	Concerned about de-watering associated with mining activity, and asks about the likely result of new water activity upstream of the Park.	2 (d)	Noted. Comment addresses issues beyond the scope of the plan. DEC is unable to control activities that occur outside the planning area on lands not vested in the Conservation Commission. Any new mining proposal (including de-watering activities) within or outside the planning area will be subject to an Environmental Review and Management Programme (prepared by the proponent and the EPA) and requires Ministerial approval.
213	Concerned that extensive information has been obtained and incorporated into the draft management plan from the West Pilbara Water Supply Scheme Water Resource Management Operation Strategy (WRMOS) dated June 2001 without consent of the Corporation posing problems associated with confidentiality and the currency of information.	1 (e)	Noted. Comment indicates omission, inaccuracies or a lack of clarity. References to the WRMOS dated June 2001 removed. However, water extraction figures cited in this paragraph provided by the Department of Water with permission to publish and have been retained in the plan.
214	Concerned about the content of sections 16 and 37 which should be modified to correct misleading statements, remove operational information not relevant to the management plan and include information about strategic water planning being undertaken in the Pilbara Region by Department of Water and Water Corporation. Suggests a meeting between DEC, Department of Water and Water Corporation.	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity. Sections 16 and 37 rewritten, removing operational information and adding information about the Pilbara Water Plan. A meeting was held between Water Corporation, Department of Water and DEC on 14th May 2008.

Comment No	Summary of Comment	Criteria	Discussion/Action taken
215	The Millstream aquifer is a strategic water source for local community and industry and suggests that the Water Corporation and the Department of Water should be adequately consulted in the development of this management plan.	2 (d)	Noted. Comment addresses issues beyond the scope of the plan.
216	Supports the commitment made by DEC to improved management of water extraction from the Millstream borefield.	2 (a)	Noted. Comment supports the plan
217	Concerned that the management plan recognises that there may be changes to water demand from the West Pilbara Supply Scheme but does not address how these changes may impact on the system infrastructure throughout the management area. Advises that planning is underway and one of the potential future options is the use of non-traditional sources such as mine dewatering. Should a mining operation with excess water requirements commence in the immediate area there is the potential to deliver water directly into the current infrastructure.	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity. Sections 16 and 37 rewritten to include information about the Pilbara Water Plan and other planning processes being carried out by Department of Water. These processes will address the use of non-traditional sources such as mine de-watering.
218	Advises that DoW is investing in improving the Millstream hydrogeological model, which will allow for modelling of alternative borefield configurations, which may reduce the direct impacts of extraction on the Millstream pools. If modelling shows that a more sustainable draw can be achieved through modification of the borefield, this option would be considered. Although this and the issue raised in comment 220 are only conceptual at this point, it should be recognised in the plan that future demands may drive modification of the WPSS infrastructure and/or the borefield.	1 (e)	Noted. Indicates omission, inaccuracies or a lack of clarity. Sections 16 and 37 rewritten to include information about the Pilbara Water Plan and other planning processes being carried out by Department of Water. These processes will address the use modelling of alternative borefield configurations.
Millstream-Harding Consultative Committee			
219	Advises that the terms of reference for the Millstream-Harding Consultative Committee are under review.	1 (e)	Noted. Comment indicates omission, inaccuracies or a lack of clarity.
220	Suggests that the reference to the Millstream Environmental Water Management Program (page 129) is removed as no such program exists.	1 (e)	Noted. Comment indicates omission, inaccuracies or a lack of clarity.
221	Supports the draft plan providing a clear commitment by DEC to the Millstream Harding Consultative Committee and the implementation of the Millstream Water Management Plan.	2 (a)	Noted. Comment supports the plan
Public Water Supply			
222	Concerned about the reference to a "conditional licence" (page 129, second paragraph). All water allocation licences have conditions. The wording suggests that licence issued to the Water Corporation has exceptional conditions. Suggests removing the word conditional.	1 (e)	Noted. Comment indicates omission, inaccuracies or a lack of clarity.

Comment No	Summary of Comment	Criteria	Discussion/Action taken
223	Advises that the licence does not refer to the long term average draw (page 129, second paragraph), but the condition of groundwater licence 105696 states, "Subject to the strategy, the draw of groundwater, pursuant to this licence, when combined with the amount of surface water taken pursuant to licence 105715 shall not exceed a total of 15 000 000 kilolitres per annum without prior approval of the Commission."	2 (e)	Noted. Comment is one viewpoint and the plan contains the preferred option. See discussion associated with comment # 71.
224	Concerned about reference to the long term impact of abstraction (page 130, paragraph 3). The potential impact of increased abstraction rates is also dependent on other factors such as water level in the aquifer and recharge to the aquifer. For monitoring results to show that higher rates of abstraction do not place stress on wetland ecosystems implies that higher abstraction rates are trialled.	2 (e)	Noted. Comment is one viewpoint and the plan contains the preferred option. The most significant impact on riparian vegetation and ecosystems is over-extraction of water from the aquifer. The submitter stated in their submission that water extraction from the Millstream aquifer for public water supply and the supplementation of Chinderwarriner Pool was between 12 and 16Gl/annum. These higher rates of extraction coincided with tree mortality and vegetation decline in the Millstream delta, which effectively was a trial. This statement has been retained in the plan.
225	Concerned about the statement, ".....contingency plan and need to develop a new borefield." (page 130, paragraph 5). This is not a stated condition on the licence and suggests this paragraph should be removed. If anything is stated, it should clearly differentiate between contingency planning and source development planning. The Water Corporation is undertaking planning to determine other water sources to cater for expected increased demand in the Region. There are currently no plans to seek an increase in licensed allocation from the Millstream/Harding combined sources.	1 (e)	Comment indicates omission, inaccuracies or a lack of clarity. The statement about the need to develop new borefields changed to, "Should monitoring show that aquifer levels are too low and/or the rate of aquifer decline too high, the development of a contingency plan will be important and should recommend that new water sources are established." The licence outlines that, in a drought situation, a contingency plan is required. Extra information added to the plan to make the distinction between a contingency plan and a long-term source development plan.
226	Suggests that the paragraph referring to individual Water Corporation customers and specific statutory agreements should be removed (page 130, paragraph 6).	1 (e)	Comment indicates omission, inaccuracies or a lack of clarity. Paragraph changed to state, "Various mining companies have negotiated statutory agreements committing the Water Corporation to supply their industrial water requirements."
227	Advises that operating, monitoring and reporting protocols are not a stated condition of the licence (page 130, paragraph 7), but are contained within the WRMOS associated with the licence.	1 (e)	Noted. Comment indicates omission, inaccuracies or a lack of clarity. Paragraph modified to state, "The Millstream Water Management Plan recognises the cultural significance and importance of the Millstream area to Indigenous people and cultural considerations have been incorporated into the West Pilbara Supply Scheme Water Resource Management Operating Strategy (WRMOS) associated with the licence granted by the Department of Water."
228	In response to the statement (page 131, second key point), "Water cannot be abstracted from the Millstream aquifer if environmental conditions are breached." states it is the responsibility of the Department of Water to manage the water resource.	2 (e)	Noted. Comment was based on unclear or factually incorrect information. The statement, "Water cannot be abstracted from the Millstream aquifer if environmental conditions are breached" is correct. This is contained within the licence conditions. In addition, DEC plays a role in managing the Millstream aquifer, given that the Department sits on the Millstream-Harding Consultative Committee, which comments on the condition of the licence.
229	Suggests that the statement, "THMs in water from the Harding Dam pose a health risk." (page 131, third key point) is both alarming and incorrect. THMs are a chlorination by-product and are not found in raw water. The potential for THM formation has been addressed by treatment facilities.	1 (e)	Noted. Comment indicates omission, inaccuracies or a lack of clarity. Statement changed to "The formation of THMs can affect water quality in the Harding Dam."

Comment No	Summary of Comment	Criteria	Discussion/Action taken
230	In response to the objective, "...to ensure that management of the Millstream aquifer complies with the conditions of the Water Corporation licence." (page 131), states that management of the Millstream aquifer and water allocation licences is the responsibility of the Department of Water.	2 (e)	Noted. Comment was based on unclear or factually incorrect information. DEC plays a role in managing the Millstream aquifer, given that the Department sits on the Millstream-Harding Consultative Committee, which comments on the condition of the licence.
231	Suggests that the performance target is unclear and asks how the impact from abstraction will be separated from the impact of other natural processes.	1 (e)	Noted. Comment indicates omission, inaccuracies or a lack of clarity. This is a legitimate KPI for DEC to measure. KPI changed to "Changes in the condition of riparian vegetation, in association with aquifer level declines and high rates of extraction from the Millstream aquifer." and target to "No decline in the condition of riparian vegetation, following high rates of water extraction from the Millstream aquifer and associated aquifer level decline." For this KPI, reporting will also be to the Millstream-Harding Consultative Committee as well as the Conservation Commission.
232	Advises that the correct owner of the statutory agreement is Hamersley Iron not Pilbara Iron (Second last paragraph, page 130).	1 (e)	Comment indicates omission, inaccuracies or a lack of clarity. Paragraph changed to state, "Various mining companies have negotiated statutory agreements committing the Water Corporation to supply their industrial water requirements."
233	Advises that the Operational Strategy for the West Pilbara Water Supply Scheme provides "specific operational details to be followed as a condition of the West Pilbara Water Supply water allocation licence." and that this document is being reviewed, in line with the renewal of the water extraction licence, and may result in possible expansion and changes to the ground and surface water monitoring programs and management objectives."	1 (e)	Comment indicates omission, inaccuracies or a lack of clarity. There is no mention of the Operating Strategy in Section 37 - Water Extraction. However, the Operating Strategy is referred to in Section 16 - Hydrology and Catchment Protection. Detail about the Operational Strategy and its review added to paragraph 5, page 40.
234	Suggests that the paragraph, "...new borefields away from the Millstream aquifer will need to be developed..." (page 130, paragraph 6) is changed to, "new sources away from..." . Alternate sources may include desalination, not only borefields.	1 (e)	Noted. Comment indicates omission, inaccuracies or a lack of clarity.
235	Advises that DEC has no legislative control or influence on the outcome of objective 2 relating to the Water Corporation reports to other Government agencies. Suggests this is removed.	1 (e)	Noted. Comment indicates omission, inaccuracies or a lack of clarity.
Water Quality Protection			
236	Suggests that maintaining water quality to ADQW guidelines is the responsibility of DoW, not DEC (page 133). The supply of drinking water to ADWG is the responsibility of the water utility and is regulated by the Department of Health. Suggests that DEC can support the maintenance of water quality by complying with the Source Protection Plan.	1 (e)	Noted. Comment indicates omission, inaccuracies or a lack of clarity. Performance measure changed to "Compliance with by-laws under the Country Areas Water Supply Act 1947." Performance target changed to, "There are no cases of non-compliance with the by-laws under the Country Areas Water Supply Act 1947 as a result of DEC activities in the planning area." and reporting requirement is annually.
237	Suggests that KPI 37.2 should be amended to reflect that, through the Millstream-Harding Consultative Committee, DEC has made the commitment to implement and annually report on vegetation changes identified through satellite imagery.	1 (e)	Noted. Comment indicates omission, inaccuracies or a lack of clarity. These suggested changes are more applicable to KPI 37.1. See discussion associated with comment number 230.

Comment No	Summary of Comment	Criteria	Discussion/Action taken
238	Suggests that, although the management plan acknowledges the requirements to protect public water supply from contamination, it does not present adequate strategies to manage threats in the medium to long-term. Increased visitation, development of recreation and accommodation facilities and maintenance of operational facilities have potential risks of contamination associated.	1 (e)	Noted. Comment indicates omissions, inaccuracies or a lack of clarity. See discussion associated with comment #28.
239	Concerned that the plan considers the potential impacts of development but does not provide a long-term approach to the development of facilities, staff accommodation and park operation headquarters. Suggests that the draft management plan make a commitment to create a development plan to address issues associated with the WSPA so that future development activities can be considered across the park, not on a case-by-case basis. Suggests that the plan should outline key development proposals, their location, associated risks to water quality, management options to minimise these risks and the approvals required prior to works. Advises that DoW can provide assistance in the development of this plan.	2 (d)	Noted. Comment is beyond the scope of the plan. The impact of the development of visitor facilities on specific values within the planning area is too detailed for this management plan. The impacts of the development of facilities, accommodation (for both visitors and staff) and park operations headquarters on the water source protection area will be considered in the Visitor Services plan. In addition the impacts will also be considered in individual site development plan and both will include detailed consultation with DoW." A commitment to prepare the Visitor Services Plan is given in strategy 6, Section 25 - Visitor Opportunities. Text on page 79 describes five criteria which will be outlined in the Visitor Services Plan to determine future visitor facilities development. An additional criterion was added, "impacts on natural and cultural values."
Management and Monitoring			
240	Advises that the Corporation reports to the DoW in relation to water allocation licencing and is not aware of any commitment to formal reporting to the Conservation Commission.	1 (e)	Noted. Comment indicates omission, inaccuracies or a lack of clarity. Strategies 2 modified to "ensuring the Water Corporation provides an annual report to the Millstream-Harding Consultative Committee, reviewing water abstraction from the Millstream aquifer." Strategy 3 removed.
241	Advises that the Millstream Water Management Plan and the West Pilbara Water Supply Scheme Operating Strategy are separate documents. The operating strategy is not reviewed annually - operation and compliance with the operating strategy is reviewed annually via Detailed Annual Statements.	1 (e)	Noted. Comment indicates omission, inaccuracies or a lack of clarity. Reference to the Operating Strategy in Paragraph 1 of this section removed to reduce confusion.
242	Suggests that objectives 2 and 3 are removed where DEC makes a commitment to ensure that DoW and WC undertake their reporting requirements. Advises that DoW does not consider this to be an objective that DEC can be accountable for.	1 (e)	Noted. Comment indicates omission, inaccuracies or a lack of clarity. Strategy 2 states that the Department encourages the Water Corporation to report to the Millstream-Harding Consultative Committee. As a member of the Millstream-Harding Consultative Committee, DEC plays a role in ensuring the terms of reference of the committee (including reporting requirements) are met. Strategy 3 removed.
PART G: CARING FOR COUNTRY: INVOLVING THE COMMUNITY			
38. Community Education and Interpretation			
243	Concerned that the Warlu Way Project (which is passes through the Millstream Chichester National Park), the associated media campaign and its impact on the region will increase tourism in the park in the 2008 tourist season, regardless of whether the park is market ready or not. Suggests this is an example of the proposed management plan not driving the identification of immediate issues affecting the park and surrounding area.	2 (c)	Noted. Comment makes statements already in the plan or was considered during the plan preparation. Where appropriate the plan addresses issues confronting the planning area in the near future and this is supported by current day-to-day management of the planning area. For example, over the past two years, upgrading Stargazers Camp and the Milyana Campground has already commenced so there is a greater capacity to accommodation more campers in the park now.

Comment No	Summary of Comment	Criteria	Discussion/Action taken
39. Community Involvement and Volunteers			
244	Given the commonality of interests and the history of cooperation between the Millstream Work Camp and the local communities, suggests the establishment of a formal partnership between the Park Council and the Millstream Work Camp. The prisoners at the Millstream Work Camp are a dedicated and proficient work force whose services make a significant contribution to the Millstream Chichester National Park. Seeks support from DEC to create a partnership agreement.	1 (e)	Noted. Comment indicates omission, inaccuracies or a lack of clarity. There is already a formal agreement between DEC and the Department of Corrective Services associated with the Millstream Work Camp. It is likely this will require a review over the life of the plan. Strategy 2 has been changed to, "supporting the continued involvement of prisoners from the Department of Corrective Services Work Camp in maintenance projects and other on-ground works in the Millstream Chichester National Park and reviewing the formal agreement between the Department and the Department of Corrective Services."
245	Suggests the above agreement could cover, (a) a schedule of visits to the work camp by Park Council representatives, (b) involvement of the Park Council in planning, organising and implementing cultural and educational activities at the Work Camp; (c) that the Park Council provides Work Camp prisoners with traineeship and work experience opportunities; (d) consideration of Work Camp prisoners who are approaching their release date for employment opportunities within the Park; and (e) assisting prisoners with job placement upon release by Park authorities.	2 (d)	Noted. Comment addresses issues beyond the scope of the plan. This level of detail about any proposed agreement between DEC and the Millstream Work Camp is too specific for a management plan. These suggestions will be examined by Regional Staff in the development and implementation of such an agreement.
PART H: MONITORING AND IMPLEMENTING THE PLAN			
40. Administration			
No comments were provided on this section.			
41. Research and Monitoring			
246	Considers the objective for the need for further research is excellent.	2 (a)	Noted. Comment supports the plan
247	Suggests further research into land snail species and distribution in the area and a new survey of fishes and aquatic invertebrates of the river system.	2 (d)	Noted. Comment addresses issues beyond the scope of the plan. The recommendation of further research into land snails in particular is too detailed for the management plan. The list of further research requirements proposes the need for more "studies into flora and fauna species and ecosystems", which would include species such as land snails. A survey of freshwater fish in the Pilbara was carried out by Murdoch University on 2004 (Morgan and Gill 2004)*. Aquatic invertebrates were collected at two sites on the Fortescue River in the Millstream Chichester National Park and at other sites at Gregory Gorge and the Fortescue Marshes.
42. Term of the Plan			
No comments were provided on this section.			
GLOSSARY			
No comments were provided on this section.			
YINJIBARNDI LANGUAGE GLOSSARY AND YINDJIBARNDI AND NGARLUMA PRONUNCIATION GUIDE			
No comments were provided on this section.			
REFERENCES AND PERSONAL COMMUNICATIONS			
No comments were provided on this section.			

Comment No	Summary of Comment	Criteria	Discussion/Action taken
APPENDICES			
Appendix 2 - Environmental Water Provisions			
248	Concerned that extensive information has been obtained and incorporated into the plan from the WRMOS dated June 2001 without the prior consent of the Water Corporation. The WRMOS is regularly reviewed and therefore there are concerns with currency of information.	1 (e)	Noted. Comment indicates omissions, inaccuracies or a lack of clarity. References to the WRMOS, June 2001 removed from the management plan. Appendix 2 removed and Environmental Water Provisions summarised in the main text of the plan.
249	Advises that DoW has been designated as the Department responsible for EWP management and suggests that the management plan should make reference to DoW's new role in this regard.	1 (e)	Noted. Comment indicates omissions, inaccuracies or a lack of clarity. Comment reflecting this added to the plan.
Appendix 6 - Guiding Principles for Fire Management in Spinifex Grasslands of Australia			
250	Commends the inclusion of "Appendix 6 - Guiding Principals for Fire Management in Spinifex Grasslands of Australia".	2 (a)	Noted. Comment supports the plan
Appendix 8 - Vehicle Access Strategy			
251	Advises that the maintenance of access roads to the Millstream aquifer monitoring sites is DEC's responsibility and suggests that this be included in Appendix 8 with DEC being named as the managing authority.	2 (d)	Noted. Comment addresses issues beyond the scope of the plan. Appendix 7 only shows public access roads. Roads to aquifer monitoring sites are not public access roads, but are management access only roads. The maintenance of management access only roads in the planning area are the responsibility of the Department.
MAPS			
252	Suggests that the reference to Wittenoom on Map 15 (pg 180) is removed, as the Government's policy is to close the town down due to the health risks of asbestos contamination. To avoid unnecessary health risks to tourists and possible litigation by victims of the associated diseases, suggests that any future maps published by DEC do not refer to Wittenoom unless absolutely necessary.	1 (e)	Noted. Comment indicates omission, inaccuracies or a lack of clarity.
253	The plan indicates a proposed addition to the national park which extends southward towards the Tom Price Railway and the Roebourne-Wittenoom Road. Suggests that, to the west of the point where the Roebourne-Wittenoom Road intersects the Tom Price Railway (near Cowcumba Creek), that the proposed addition only extend to the Tom Price Railway and not south of that to the Roebourne-Wittenoom Railway. Also suggests that east of the point where the Roebourne-Wittenoom Road intersects the Tom Price Railway (near Cowcumba Creek), the proposed addition extend only to 500m north of the Roebourne-Wittenoom Road. This will ensure that the future Karratha-Tom Price Road, Stages 3 and 4 can be constructed without impacting on proposed national park extension.	1 (d)	Noted. Comment proposes strategies that would better achieve management objectives. The proposed road reserve alignment for Stage 3 of the Karratha-Tom Price Road will form the southern boundary of the Fish Pool Block addition.
254	Suggests that Map 15 be changed so that its title does not cover the Wellhead Protection Zone indicated in the legend. There may be similar cartographic slips in other maps.	1 (e)	Noted. Comment indicates omission, inaccuracies or a lack of clarity.

* Morgan, D.L & Gill, H.S. Fish fauna in the inland waters of the Pilbara (Indian Ocean Drainage Division) of Western Australia - evidence for two bioregions. Zootaxa 636 (1-43).

APPENDIX 1: SUBMITTERS TO THE PLAN

Submitter	Representation
Individuals	
Marilyn King	
State Government	
Chris Berry	Department of Local Government and Regional Development
Melanie Harding	Department of Environment and Conservation
Rick Sneeuwjagt	Department of Environment and Conservation
Sean Bryce	Department of Environment and Conservation
Pam Thorley	Department of Indigenous Affairs
Peter Mawson	Department of Environment and Conservation
Ron Chalmers	Disability Services Commission
Bob Saligari	Main Roads Western Australia
Richard Muirhead	Tourism Western Australia
Paul Biggs	Forest Products Commission
Dawn Casey	Western Australian Museum
David Hartley	Department of Agriculture and Food
Ian Briggs	Department of Industry and Resources
Ian Baxter	Heritage Council of Western Australia
Eric Lumsden	Department for Planning and Infrastructure
Vicki Winfield	Department of Environment and Conservation
Steve Bellussi	Department of Water
Jo Harrison-Ward	Fire and Emergency Services of Western Australia
High Maclean	Department of Sport and Recreation
Rod Quartermain	Department of Environment and Conservation
Roger Holding	Department of Corrective Services
Local Government	
Keith Parsons	Pilbara Regional Council
Other Organisations	
Colin Walker	Royal Society of Western Australia
Alex Burbury	Pastoralists and Graziers Association
Kelvin Barber	Water Corporation
Ken Owen	Air Services Australia
Peter Cook	Pyramid Station
Keith Parsons	Coolawanya Pastoral Co. Pty. Ltd
Richard Dudley	Air Services Australia