

Kalbarri National Park

Analysis of public submissions

to the

draft management plan 2014

Department of Parks and Wildlife

for the

Conservation Commission of Western Australia

OVERVIEW

This document is an analysis of public submissions to the *Kalbarri National Park draft management plan 2014* (draft plan) (Department of Parks and Wildlife 2014). It presents key issues and themes that arose from the submissions and explains how these issues have been addressed in the final plan.

The plan was released for public comment by the Conservation Commission of Western Australia on 15 April 2014 and open for comment for a period of nine weeks closing on 20 June 2014. It was available in hardcopy and as a pdf on the internet. In addition to the plan, an Invitation to Comment form was also available to facilitate effective submissions to the plan.

It was anticipated there would be significant community interest in the release of the *Kalbarri National Park draft management plan 2014*. A communication strategy was developed to outline how stakeholders and members of the public were made aware of the release of the plan in an effective and efficient manner. The strategy included:

- a notice of the plan's release published in the *Government Gazette* on 15 April 2014*
- newspaper advertisements placed in the West Australian newspaper on 16 April and 21 May and in the Midwest Times on 24 April and 15 May 2014*
- a notice on the Parks and Wildlife webpage with an *Invitation to Comment* form.
- the draft plan and *Invitation to Comment* form being sent to 109 stakeholders, including State and Federal government departments, local government authorities, traditional owners, non-government organisations, community groups, local businesses and individuals. Letters notifying people that the draft plan had been released for public comment, details about where to obtain a copy and how to make a submission were sent to a further 153 stakeholders
- an open day at the Kalbarri Visitor Centre where the public could collect copies of the plan and submission forms and discuss the plan further with Parks and Wildlife staff
- a presentation to the Nanda Native Title Working Group
- copies of the plan being available for viewing at Parks and Wildlife libraries and offices in Perth, Geraldton and Kalbarri as well as at local government libraries in Geraldton, Northampton and Kalbarri
- posters advertising the release of the draft plan being displayed on community noticeboards in Kalbarri, at display locations and at receptions at Parks and Wildlife offices in Kensington, Geraldton and at the Park Headquarters in Kalbarri.

* requirement under the *Conservation and Land Management Act 1984* (CALM Act).

In addition, a number of media outlets ran stories following the release of the draft plan. These included *The West Australian* newspaper, GWN News, ABC Radio (Midwest and Wheatbelt, Northwest and Radio National) and *The Midwest Times* newspaper.

All submissions were collated into a table for analysis. The comments made in each submission were collated according to the major headings of the draft plan they addressed. Comments were summarised based on the main point of the comment.

METHODOLOGY

The draft plan was reviewed in the light of submissions received, according to the criteria outlined below.

1. The draft management plan *was* amended if a submission:
 - a) provided additional information of direct relevance to management
 - b) provided additional information on affected user groups of direct relevance to management
 - c) indicated a change in (or clarified) government legislation, management commitment or management policy
 - d) proposed strategies that would better achieve management objectives
 - e) indicated omissions, inaccuracies or a lack of clarity.
2. The draft management plan *was not* amended if a submission:
 - a) clearly supported proposals in the plan
 - b) made general statements and sought no change

- c) made statements already in the plan or that were considered during the plan preparation
- d) addressed issues beyond the scope of the plan
- e) was one amongst several widely divergent viewpoints received on the topic but the text/strategies in the plan were still considered the preferred option
- f) contributed options that were 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/factually incorrect information
- h) provided 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 were assessed entirely on the cogency of points raised. No subjective weighting was 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.

ABOUT THE SUBMITTERS

Thirty-one submissions were received on the draft plan. Figures 1 and 2 show the breakdown of submitters according to category and location.

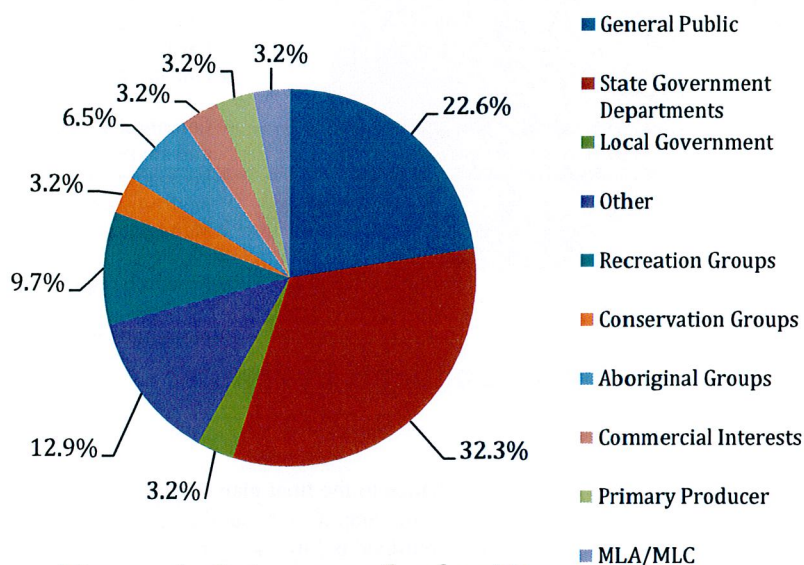


Figure 1: Category of submitter

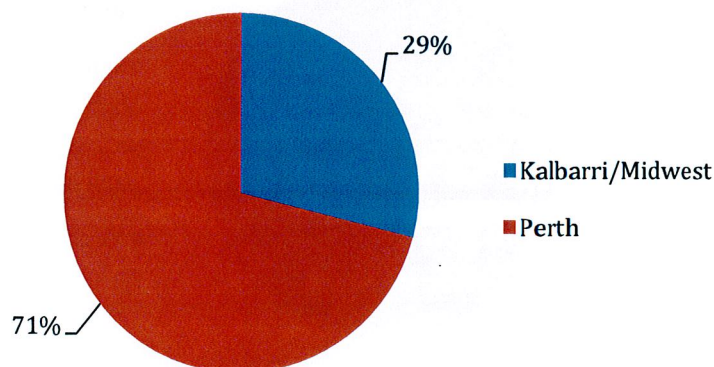


Figure 2: Location of submitter

The *Invitation to Comment* form was sent to stakeholders who were sent a copy of the draft plan and was available with the draft plan on the Parks and Wildlife website. Ten submissions were received on the *Invitation to Comment* form. As well as asking submitters about each part of the draft plan, the *Invitation to Comment* form also asked submitters about accessing the plan. Eight submitters answered these questions and all indicated it was easy to obtain a copy of the plan. Of these, four found out about the plan via mail, two from word of mouth, one from a newspaper and one from the Parks and Wildlife website. All eight also commented it was either very easy or easy understand the draft plan.

KEY ISSUES AND THEMES

The 31 submissions received on the draft plan translated to 332 comments, addressing all aspects of the plan. Figure 3 shows the breakdown of comments according to chapter in the draft plan.

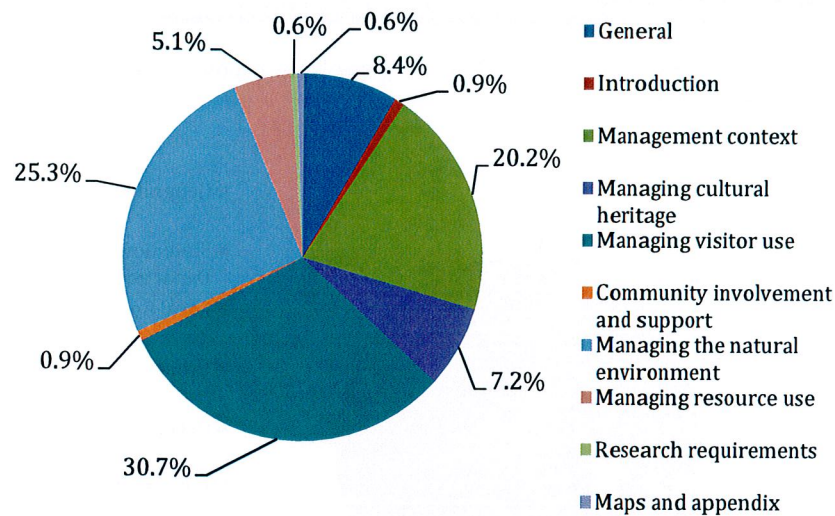


Figure 3: Comments by chapter

Just over 21% per cent of comments resulted in a change to the final plan (Figure 4). Over 17% of comments were supportive of the plan and a further 15.4% of comments were general and did not seek a change to the plan. The key issues and themes raised by submitters are outlined below, as well as how these comments were considered when amending the plan.

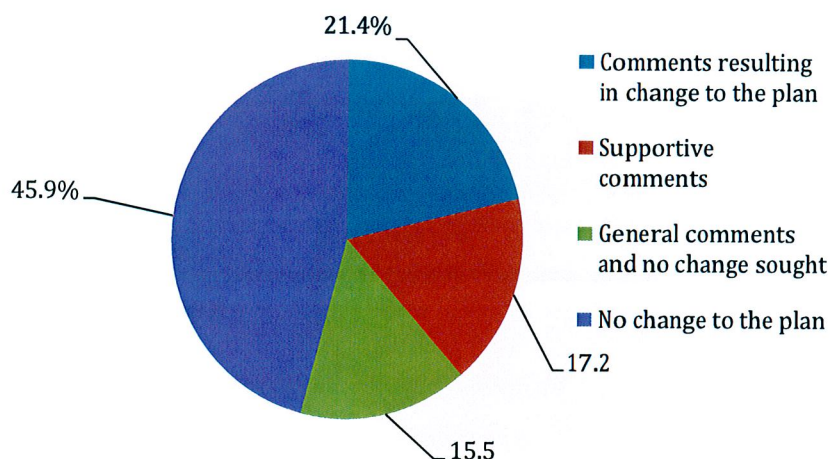


Figure 4: Types of comments and changes to the plan

Management context

Management arrangements with Aboriginal people

One of the outcomes for this section of the draft management plan was to determine the level of interest in pursuing joint management arrangements and an Indigenous Land Use Agreement (ILUA) with the Nanda native title claimants. There is a strong desire by Nanda to develop a joint management agreement and this was raised a number of times in their submission. Consequently, a management action about seeking further resources and support to develop joint management with Nanda was added.

Consideration of adjacent lands

There were a large number of comments about the adjacent lands considered for reservation (the second highest for any section of the plan). Just over three-quarters of these did not support the addition of these to the conservation reserve system. However, Parks and Wildlife thinks there is a very strong rationale for considering these areas for reservation and the final plan still proposes that these areas are added to the conservation reserve system because they;

- have a range of natural, cultural and recreational values requiring protection
- have the potential for the development of new and/or complementary recreation sites and experiences to those on offer in the park
- provide a more practical reserve management boundary
- support vegetation associations and floristic communities or landscape types that are not or not well represented in the conservation reserve system
- have been proposed for reservation for a long time (ie were recommended in *Conservation reserves for Western Australia: As recommended by the Environmental Protection Authority 1976: systems 1, 2, 3, 5* (EPA 1976) and the *Kalbarri plan* (Department of Planning and Urban Development 1992))
- improve ecological linkages to conservation reserves outside the planning area, providing larger areas with improved potential for conservation
- have been identified to compensate or offset previous excisions from the park
- provide refuges for species impacted by climate change, which will improve the resilience of affected species
- improve the representation and protection of important geodiversity in the area.

A number of submissions proposed the addition of the area of UCL located between Kalbarri and the park along a 15km section of river corridor, known locally as Paradise Flat. This area has only limited biodiversity values and is very degraded. As a result, this area was not included in the management plan to be considered for reservation.

Given the large response to the *Consideration of adjacent lands* section, detail was added to the plan to clarify the process that would be followed to progress these proposals, including negotiations with native title parties and other stakeholders.

Managing cultural heritage

Several comments were received providing additional information about Nanda cultural heritage and the significance of the park for Nanda. This information was added to the plan.

Managing visitor use

This chapter received the most comments of any chapter in the plan.

Visitor safety

A number of comments were received about improving mobile phone communication and how this would improve response times during emergencies in the park. A management action about improving communication in the park was outlined in the draft plan and will remain in the final. In addition one submitter suggested that improved mobile communication would allow the installation of defibrillators in the park. The plan now proposes investigating options for improving emergency equipment.

Several submitters provided information about risks associated with rock fishing and rock climbing which are popular activities in the park. These details were added to the plan.

Information, interpretation and education

Several comments were made about the strong desire of Nanda to establish a cultural and interpretive centre in the park. Detail was added to the plan outlining that Parks and Wildlife will consider any such proposals from Nanda about developing a cultural centre in the park.

Access

Nearly half of the comments relating to access in the park supported the proposal to seal the remainder of the Loop/Z Bend Road.

Some submitters disagreed with Parks and Wildlife's position in the plan not to support a coastal road between Kalbarri and Steep Point. Since the release of the draft management plan, The Mid West Development Commission released the *Mid West tourism development strategy* (Evolve Solutions 2014), which proposes a four-wheel drive trail along the Zuytdorp Coast between Kalbarri and Shark Bay. The plan outlines Parks and Wildlife's opposition to the development of a two-wheel road along this section of coast and the reasons for this. However, on the basis of these submissions and the Mid West Development Commission's proposal, the plan now states that Parks and Wildlife will consider the development of a four-wheel drive trail subject to considerably more planning and feasibility assessment.

Visitor activities

Of the whole plan, this section received the most comments.

The draft management plan proposes providing a range of new facilities at Inyaka Wookai Watju (West Loop). Since the release of the draft plan, Parks and Wildlife has progressed the development of a "skywalk" lookout at this site. Following consultation with the Mid West Development Commission and Tourism Western Australia, this was also proposed in the *Mid West tourism development strategy* and was raised in one of the submissions. Consequently, the management action "develop a cantilevered lookout offering expansive views of the Murchison Gorge" was added to the plan to incorporate this proposal.

A large number of submissions expressed a strong desire for a more definite management action about the development of camping areas in the park. As a result, Parks and Wildlife will now investigate the feasibility of providing a vehicle-based camping area in the park and, on the basis of this investigation, develop a camping area as resources allow. Areas will be designated for camping within the park, initially for group camping and later for all visitors. The plan was changed to reflect this.

Managing the natural environment

Most comments on this chapter related to omissions, inaccuracies or lack of clarity and the plan was modified accordingly.

The most comments related to the *Introduced and other problem animals* section. There was some concern about the expense of aerial shooting. Parks and Wildlife has analysed the cost-benefit of aerial shooting and believes this is the most cost-effective method for the control of feral goats and pigs in the park. Additional information explaining this rationale was added to the plan.

One submitter suggested that ground shooting be used to supplement aerial shoot programs and this was added to the background text.

There was a comment suggesting that Parks and Wildlife works more closely with shooting groups and stakeholders in animal control programs. Another submitter suggested that the department work with apiarists to control feral bees. A management action about working with community groups and other relevant stakeholders to control introduced and problem animals was added as a management action.

Several submissions on this issue felt that the draft plan did not give enough emphasis to the control of pigs in the park. As a result, pigs were added to the management action, "Continue to control goats, seeking support and assistance from Murchison House Station". Also, pigs were added to the two existing key performance indicators and a new key performance indicator was added, "Pig damage in populations of threatened flora", with the target being, "The presence of pig damage recorded in populations of threatened and priority flora decreases"

A number of submitters thought there was not adequate information about Nanda burning. Additional information from the submissions and additional references were included in the background text.

Managing resource use

Information clarifying legislation associated with mineral and petroleum operations was added to the plan as a result of one submission.

Since the release of the draft management plan, Parks and Wildlife has done further work on Policy No. 41 *Beekeeping on public land* and the associated guidelines. The plan now refers to the assessment criteria in the

policy which assesses applications for apiary sites against criteria such as proximity to threatened flora and ecological communities, weeds, disease risk areas and recreation sites.

References

Department of Parks and Wildlife (2014) *Kalbarri National Park draft management plan 2014*. Department of Parks and Wildlife, Perth

Department of Planning and Urban Development (1992) *Kalbarri plan*. Western Australia.

Evolve Solutions (2014) *Mid West tourism development strategy*. Mid West Development Commission, Geraldton