

CAPE RANGE NATIONAL PARK

Analysis of Public Submissions

to the

Draft Management Plan

Department of Environment and Conservation

for the

Conservation Commission of Western Australia

August 2008

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BACKGROUND

This document is an analysis of public submissions to the Cape Range National Park Draft Management Plan 2005.

The plan was released for public comment on 14 February 2006 for a period of 3 months. A total of 51 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 a local newspaper and two issues of *The West Australian*, advising that the plan was available for comment. The plan was distributed to State Government departments, tertiary institutions, recreation and conservation groups, local authorities, libraries and other community groups and individuals who expressed interest during the preparation of the draft. The plan was available for viewing and/or downloading from the Department of Environment and Conservation's (the Department's) *NatureBase* website. Electronic submissions could also be made via this website. Printed copies of the plan were made available at Departmental offices in Kensington, Exmouth and Karratha and could be inspected at the Departmental library at Woodvale, and the Exmouth Shire public library.

METHOD OF ANALYSIS

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

1. The Draft Management Plan was amended if a submission:
 - a) provided additional resource information of direct relevance to management;
 - b) provided additional information on affected user groups of direct relevance to management;
 - c) indicated a change in (or clarified) Government legislation, management commitment or management policy;
 - d) proposed strategies that would better achieve management objectives and aims; or
 - e) indicated omissions, inaccuracies or a lack of clarity.

2. The Draft Management Plan was not amended if a submission:
 - a) clearly supported statements in the plan;
 - b) made a general statement and no specific change to the plan was sought;
 - c) made points already in the plan or that were considered during the plan preparation;
 - d) addressed issues beyond the scope of the plan, or involved details that are not appropriate or necessary for inclusion in a document aimed at providing management direction over the long-term;
 - e) was one amongst several widely divergent viewpoints received on the topic, and the strategies of the draft management plan were still considered the best option;
 - f) contributed options that were not feasible (generally due to some aspect of existing legislation, Government policy, or resource/knowledge constraints); or
 - g) was based on unclear or factually incorrect information.

ANALYSIS TABLES

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
GENERAL COMMENTS			
1	Submission specifically states that it does not support the whole Cape Range National Park Draft Management Plan	2b, 2e	Opinion noted
2	Support for the local council and its response to this document.	2b, 2e	Opinion noted
3	Included with this submission was a petition with 403 signatures, supporting the Shire of Exmouth's submission, the main concerns being land use and investigation areas, environmental management programs, restriction on access to raw materials, visitor management settings and implementing and financing the plan.	2e	Petition noted. The Shire's position regarding these issues was not well articulated to the community and involved misinformation and misrepresentation of the plan's proposals - this undermines the validity of the petition. See also responses to the specific comments made by the Shire.
4	The Department's management direction and purpose is to "take over everything and charge locals to do the things they live here for".	2b	Opinion noted. This is a general statement that does not suggest a specific change to the plan.
5	Submitter criticising DEC's day to day management of the park (e.g. staff-visitor interactions, rubbish collection).	2b	Opinion noted. This is a general statement that does not suggest a specific change to the plan.
6	"It is transparent from the draft management plan that decisions are being made with economic and budgetary considerations taking precedence and, generally, contrary to prescriptions of the original management plan, with environmental considerations becoming secondary and community/tourism recreation considerations disregarded unless they generate significant revenue"	2b	This is a general statement that does not suggest a specific change to the plan. The draft plan is in a general sense in keeping with the 'original' plan, however it was appropriate and necessary to review of its specific prescriptions and recognise that the context of management has changed. It is unclear from which aspects of the draft plan the submitter has drawn their conclusion that environmental and community/tourism recreation concerns are a secondary consideration. Examples that demonstrate the primary importance that the plan has placed on environmental protection are too numerous to describe here (they include objectives and strategies throughout Part C - Managing the Natural Environment and Part E - Managing for Visitor Use). Revenue collected from visitor fees offsets a very small proportion of the costs of conservation and other park management, including the improvement of visitor services and facilities. Revenue is retained by the Region/District in which fees are collected and reinvested in the management of the reserves in that Region/District.
7	The persons with most influence on this management plan are those with least personal interest, experience and on-going knowledge of the local environment and community. The several people tasked with composing it apparently did not even visit the area (or if they did, made no effort to communicate that to stakeholders). Many of the policy	2b	This is a general statement that does not suggest a specific change to the plan. Preparation of the plan involved a team of Departmental staff including local staff and others with very extensive experience and knowledge of the area. All staff with key involvement in the plan preparation are familiar with the area. The plan preparation involved

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
	directions in the plan are those espoused by CALM management who neither live nor work in the local community, and those policies were unsupported by the majority of local CALM staff in the 1990's.		consultation with the Coral Coast Parks Advisory Committee and the Coral Coast Park Council. Other consultation included community meetings/events in Exmouth and elsewhere along the Ningaloo Coast, distribution of 'Have Your Say' brochures and public notices in newspapers.
8	CALM has alienated itself from the local community, created an attitude of hostility to itself and visiting tourists, and all but lost support from them (locals). The number of local volunteers has significantly decreased and a number of CALM staff have recently resigned or left the region stating community hostility as the reason. This situation is only to be expected when the Department has failed to honour almost every negotiated compromise the local community has been promised for the last 20 years (submitter provides examples where in his view the Department has neglected to meet promises - protection of popular fishing areas from sanctuary zones, local ratepayers to be exempt from NP access fees, additional campsites).	2b	Opinion noted. This is a general statement that does not suggest a specific change to the plan.
9	"The structure and content of this draft plan and communication with a number of stakeholders contributing to it gives every indication this process is subject to the same insincerity and disdain for input as that for the Ningaloo Marine Park Management Plan."	2b	Opinion noted. This is a general statement that does not suggest a specific change to the plan.
10	CALM cannot and are not managing the land they have now effectively. What have they achieved environmentally in the last two decades? The park is in a poor state despite there being more staff than ever before.	2b	Opinion noted. This is a general statement that does not suggest a specific change to the plan.
11	CALM want more control, more money, more staff and more of everything. I wish they would work more with the community that lives here instead of against them as they do.	2b	Opinion noted. This is a general statement that does not suggest a specific change to the plan.
12	Most CALM officers I have dealt with know very little about recreation and tourism. Government workers appear to have no concept of small business and appear to look after their own interests, not that of the community.	2b	Opinion noted. This is a general statement that does not suggest a specific change to the plan.
13	CALM very rarely listens to the community.	2b	Opinion noted. This is a general statement that does not suggest a specific change to the plan.
14	Submission specifically states support for the draft plan in its current form.	2a	Statement of support noted.
15	The draft management plan has been well thought out and considers the many and complex issues involved.	2a	Statement of support noted.
16	The draft management plan appears to be reasonably balanced in the	2b	Statement of support noted.

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
	areas of environmental, social and economic considerations.		
17	Support for all attempts to manage the National Park environmentally as well as increasing access for recreational users.	2b	Statement of support noted.
18	Congratulates the writers and researchers of the Draft Plan for their clarity of presentation and mapping. The wide web of issues impacting the park were untangled, defined and a method of engaging with them was put to paper succinctly.	2a	Statement of support noted.
19	The draft plan is a significant step towards CALM, tour operators and volunteers working for a common purpose.	2a	Statement of support noted.
20	I congratulate the staff who have been involved in researching and preparing what is in some ways a comprehensive document.	2a	Statement of support noted.
21	Support for the proposals set forth in the management plan. They are sensible and in combination with the Ningaloo Reef proposals should go a long way to assisting in preserving the environment of the area. Of course, human visitation must result in degradation but the plan manages it satisfactorily.	2a	Statement of support noted.
22	"The draft plan has our full support. It is comforting to know that the Government is prepared to ensure this unique area is preserved for future generations. The term of the plan of 10 years provides us with the knowledge of what can be expected in the medium to longer term. Good work."	2a	Statement of support noted.
23	We would like to congratulate CALM for the excellent document that has been produced. It is an excellent update of the much outdated previous plan.	2a	Statement of support noted.
24	We would like to give our broad support for the draft plan as presented.	2a	Statement of support noted.
25	The Department and Conservation Commission should be congratulated on the preparation of a comprehensive document to guide the management of Cape Range NP.	2a	Statement of support noted.
26	Concur with Part A of the plan	2a	Statement of support noted.
27	Concur with Part B of the plan	2a	Statement of support noted.
28	Petition with 10 signatures, in support of the management plan, with the emphasis on conservation and protection of the environment.	2a	Support noted.
29	Can you change this to plain English, it is a dry read.	2e	The language is made as accessible as possible, however, given the nature and complexity of the material (e.g. legislation, policy, scientific research summaries) and the diverse "audience", there are limits to the extent that a management plan can be made less of "a dry read".
30	The Department does not contribute funds to fiscal maintenance demands of infrastructure such as Yardie Creek Road, Ningaloo station	2b, 2f	No specific change to the plan was suggested. Maintenance of the infrastructure mentioned does not come under the jurisdiction of DEC,

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
	access road, Tantabiddi and Bundegi boat launch ramps. These costs are born by the Shire of Exmouth, with the result being that just over 1000 ratepayers are unfairly required to subsidise the costs of visitors and maintain the infrastructure for about 250,000 visitors annually. The failure of CALM and government generally to recognise the prior contribution of local ratepayers through rates and taxes at Local, State and Commonwealth levels is a travesty.		but rather the Shire of Exmouth and Main Roads WA.
31	The vision statement suggests that the natural values of the CRNP will be enhanced "...by improving the resilience of natural ecosystems...". How can humans improve the resilience of natural ecosystems, which is an inherent feature of the natural environment? Perhaps the wording could be "...by reducing pressures on natural ecosystems..." or "...by reducing stress on ecosystems and therefore promoting their natural resilience...".	1e	Noted. Plan amended accordingly.
32	The Vision statement could be simplified to a succinct statement such as that in the Ningaloo Marine Park Management Plan, which is concise and articulate while still incorporating relevant values and information.	2e	The approach in the plan is still considered the best option. Incorporating more detail into a vision statement can provide a more tailored vision, distinguishable from that which could apply for almost any conservation reserve.
33	The fourth paragraph (of the Vision statement) concludes with "An increasing number will support...". The statement may achieve greater clarity by stipulating what an <i>"increasing number"</i> refers to - community members, locals, government agencies, visitors, commercial operators, etc.	1e	Noted. Plan amended accordingly.
34	Support for the objective of securing World Heritage listing to help protect the Parks from political and commercial infringements.	2a	Support noted.
35	I don't believe the pursuance of a World Heritage listing for Ningaloo is in the area's best interests, due to the tourist pressure that the 'fame' of a WH listing would ensure. This is a known fact with reference to just about all other accessible WH sites worldwide.	2d	Opinion noted. Planning, including community consultation for the World Heritage nomination proposal is being done through a separate process to the development of this management plan.
36	The plan could be improved by including maps of the proposed World Heritage listing area.	2f	The boundaries of the proposed World Heritage nomination area have not been finalised.
37	Submissions suggesting a priority plan (including prioritising of objectives and strategies) should be developed to deal with limited resource issues.	2d	The broad management plan priorities are reflected in the Key Performance Indicators. Further detailed priority planning forms part of the plan's implementation and is done through the Regional/District annual planning and budgeting processes. Adjustments are then made as needed to respond to new information or changed circumstances.
38	Success of the plan will depend upon the provision of effective monitoring systems, particularly given projections for visitation	2d	Information about performance monitoring and assessment is in Section 10 and in the Key Performance Indicators identified throughout

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
	growth. Submitter seeks further information about the Department's intentions for developing a comprehensive monitoring system.		the plan. Detailed planning of monitoring programs will be done through Region and District offices as part of the Department's annual planning and budgeting processes. This level of detail is not suited to a long-term management plan document.
39	As a general comment, the targets for KPIs are too general. Many parts of Parts E & F do not have KPIs - some we realise do not lend themselves to KPI measurement.	2e	It is not feasible to measure all aspects of management and so indicators target protection of some key values. It is anticipated that more specific targets would be able to be included in subsequent plans once some baseline measurements have been established over the life of this plan.
40	The draft plan does not appear to detail how CALM will be accountable for implementation of the plan, either internally or to stakeholders. How is the accomplishment of objectives (or lack of) periodically assessed and reviewed? Is there a process for progressive analysis and modification of the plan to maximise the efficiency of implementation?	2c	The process for assessing performance of the plan is discussed in Section 10. It describes the intention to develop and implement alternative management options where the results of assessment indicate that this is necessary (adaptive management). The Key Performance Indicators that will be used to assist with performance assessment are presented throughout the plan and summarised in Appendix 1.
41	The Department has continuously been unable to resource the management of the areas already under its jurisdiction. Only a fraction of revenue collected by CALM Exmouth has been reinvested in local parks. Staffing levels and in particular experienced field staff such as rangers has been woefully inadequate to meet the management demands.	2b	No specific change to the plan was suggested. Revenue collected from fees and charges is re-invested into management of the park. Staffing has increased.
42	The Department and Government should evaluate the resources that will be required to support this plan. There should be a funding commitment under this plan (e.g. as there is for the Ningaloo Marine Park) commensurate with requirements.	2f	Resources for management (including for example the implementation of management plans) of terrestrial reserves are considered in the business case the Department puts to Government as part of its resource allocation process.
43	The draft plan does not provide details of resources to implement the plan. Submission questioning what resources will be provided to implement the plan.	2d	Resources for management (including for example the implementation of management plans) is considered in the business case the Department puts to Government as part of its resource allocation process. Budgets are reviewed frequently and therefore the inclusion of resourcing details is not appropriate in a management plan with a 10 year + timeframe. Management plan priorities are reflected in the Key Performance Indicators. Resource allocation will be done through Region and District offices as part of the Department's annual planning and budgeting processes.
44	There are no timelines for when various activities may be done e.g. flora and fauna studies.	2d	The need for some baseline flora and fauna studies early in the implementation of the plan are implicit in the performance assessment requirements (e.g. key performance indicators described throughout the

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
			plan and summarised in Appendix 1). Detailed timelines would however be developed as part of the plan's implementation.
45	Submission considers that CALM, by not co-coordinating the review and release of the revised management plans, is not jointly managing the Ningaloo Marine Park and Cape Range National Park. Also considers that stakeholders have therefore not been able to consider conflicts and synergies, and it is now evident that significant conflict now exists between the two.	2b	No specific change to the plan was suggested. While the timing for the release of management plans for the marine park and national park have diverged, planning and management for the two areas has and continues to occur in an integrated manner. Response to this comment is difficult as the submitter has not made specific mention of where they consider the two plans conflict.
46	The Department should seek every possible opportunity to ensure that its work is fully integrated with the WAPC's processes and those of the Ningaloo Sustainable Development Office.	2c	The Department has done and continues to do this, and the commitment to doing so was made explicit in the management plan.
47	The Department's efforts in integrating this plan with the Ningaloo Marine Park Management Plan are acknowledged. This effort should continue through the final phase of development of this plan. The difficulties with integrating the management of the marine park with the national park and are acknowledged and we are reassured by the district office's determination to seek effective solutions.	2a	Support noted.
48	There appear to have been no audit or assessment of the outcomes of the previous management plan. This document appears to avoid any reference to the original management plan and its prescriptions.	2c	Although not specifically mentioned in the draft management plan, review of the existing plan is standard procedure when a replacement plan is being drafted. The draft plan does refer to the existing management plan where relevant - detailed reference to the existing plan's prescriptions is considered unnecessary.
49	There appears to be no reference to the road reserve for the Minilya-Exmouth Road in the description of existing tenure. Main Roads has responsibility for this road within and adjacent to the National Park. This responsibility area extends from Minilya to Preston Street (south of Exmouth Townsite) and inclusive of Learmonth.	2g	The Minilya-Exmouth Road is neither within or adjacent to the national park.
ADDITIONS TO THE CONSERVATION RESERVE SYSTEM			
50	Endorsement of research in areas for possible inclusion in the national park.	2a	Support noted.
51	The conservation and land use investigation areas and proposed additions to the public conservation estate are supported by the NSDO on the basis that these areas are consistent with previous planning and policy documents, as outlined in Table 1.	2a	Support noted.
52	The concept and use of 'Conservation and Land Use Investigation Areas' is fully supported and welcomed. This allows us the comfort of knowing that haphazard land use planning will not occur outside the townsite. The use of these areas will require that all affected	2a	Support noted. These areas will be subject to planning by the WAPC. The Department will undertake biological survey and other research to provide further information to be considered in that planning process.

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
	stakeholders have to consider the views and requirements of others in a designated process. Coverage of unallocated crown land in these areas is imperative.		
53	Proposed additions to the national park are supported.	2a	Support noted.
54	The incorporation of each of the areas proposed for addition to the conservation estate, as indicated on Map 1 is supported.	2a	Support noted.
55	The inclusion of the red dune fields north of the current CRNP boundary within the national park is supported. (A number of reasons for this are outlined in the submission).	2a	Support noted.
56	"Lock the locals into their town area and charge them if they move. Push the shire into a corner so calm control there resources and strangle the town to death then the cape will be safe and sterile the calm way"	2b	No specific change to the plan suggested. These areas will be subject to planning by the WAPC. The Department will undertake biological survey and other research to provide further information to be considered in that planning process.
57	"Don't lock down Exmouth": the Department will only listen to submissions that agree with the plan, as they did when they went ahead with marine sanctuary zones that the majority disagreed with.	2b, 2e	No specific change to the plan suggested. These areas will be subject to planning by the WAPC. The Department will undertake biological survey and other research to provide further information to be considered in that planning process.
58	CALM cannot and are not managing the land area they have now effectively, and so should not increase the area of the park (submitter provides example where they consider the Department has poorly managed signage and track closures in Jurabi Coastal Park).	2e	Opinion noted, however the Department has a divergent view, and will continue to fulfil its responsibilities in moving towards a 'Comprehensive, Adequate and Representative' reserve system of protected areas to conserve and protect Australia's biodiversity.
59	I cannot support the proposed additions, primarily due to a lack of confidence in CALM's ability to manage lands in a manner that is respectful and responsive of the local communities' desires, aspirations and needs.	2e	Opinion noted.
60	The Environmental Management Programmes referred to in the Plan will require specialist consultants to develop due to the proximity to the Ningaloo Reef and World Heritage Listed area. These areas will attract added scrutiny, resulting in a significant increase in the cost of developing land or new businesses. This cost has been imposed by CALM but will be passed on to residents and businesses through higher development costs, and may even result in no new business development.	2g	The plan does not refer to "Environmental Management Programs" and it is unclear which part of the plan the submission is commenting on. The comments are presumed to be in relation to the statement on page 16 regarding 'Conservation and Land Use Investigation Areas' where it states that land use proposals for these areas should be assessed for potential environmental impacts". The Department maintains that it is appropriate to encourage environmental impact assessment where proposed developments have the potential for significant environmental impacts. Decisions to undertake formal environmental impact assessments are the responsibility of the Environmental Protection Authority under the <i>Environmental Protection Act 1986</i> . The Environmental Protection Authority's position statement for the Cape Range Province (1999) indicates the principles that should be applied

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
			to environmental assessment and decision making for this area.
61	Leave the northern section of the Cape from Tantabiddi in the current joint management it enjoys and prospers today. Under this joint ownership this area is in far better condition environmentally than the park, largely due to the fact the area has no formal camping areas designated and the Shire's caretaking. Under no circumstances should the park be extended at all, leave it as it is. Where will the ever growing residential population of the town be able to venture without paying? There is no evidence at all that this area has suffered under the status quo, none!	1e	The plan was not proposing sole vesting for the Bundegi and Jurabi Coastal Parks. Some confusion appears to have arisen because it was unclear on Map 1 that the western boundary of the 'Conservation and Land Use Investigation Area 3' lay over the line indicating Yardie Creek Road. Further, it appears that comments on page 16 of the draft regarding joint management of any conservation reserves created in the future, have been mistakenly interpreted as applying to the Jurabi and Bundegi Coastal Parks. The plan has been amended correct this lack of clarity.
62	Opposition to the proposed extensions to the Cape Range National Park. Conservation and land use investigation areas 1 and 2 have no direct significance to the existing National Park, but do have a direct bearing on the quality of life for the residents and the capacity of the town to grow in the future. The biggest concern is the non ability of the town to expand in the future. At the moment there is a land shortage in the area and tying more land up in another level of bureaucracy will only exacerbate the problem. This seems nothing short of a land grab by CALM.	2c	Concerns about the town's capacity for growth are acknowledged, and the plan included reference to the Shire's and as well as other stakeholders interests in these areas. Current knowledge suggests that the area identified as Conservation and Land Use Investigation Area 3 would be of greater conservation significance than most of the areas identified as Conservation and Land Use Investigation 2 or Conservation and Land Use Investigation Area 1. These areas will be subject to planning by the WAPC. The Department will undertake biological survey and other research to provide further information to be considered in that planning process. The plan has been amended to clarify the Department's position regarding the addition of land to the public conservation estate.
63	Re Proposed Additions, Conservation and Land Use Investigation Area: Object to any areas being added to the national park because this would involve restriction/control of the local community's recreation activities and access.	2e	Opinion noted, however the Department has a divergent view, and will continue to fulfil its responsibilities in moving towards a 'Comprehensive, Adequate and Representative' reserve system of protected areas to conserve and protect Australia's biodiversity. Provision for recreation is part of the purpose of a national park, and the Department does not unnecessarily restrict access for recreation.
64	The growth corridor south of the Exmouth townsite to Learmonth provides an area for aquaculture, residential and industrial development. This corridor must remain available for future generations.	2e, 2c	These areas will be subject to planning by the WAPC and will consider a range of land use requirements. The draft plan referred to the Shire's requirements for resource extraction, industrial and other land uses.
65	Areas of significant conservation value are already protected by various Acts and regulations and this will continue. There is no need for the North West Cape to have further extensive investigation areas.	2e	The conservation values of these areas are not thoroughly known or understood. Further investigation is appropriate to more specifically identify what needs to be protected and how.
66	Further restrictions on where residents and visitors to the region can go to will adversely impact on tourism and visitor numbers to the region. The obvious impact this would have on the local tourism industry	2b	No specific change to the plan was suggested. The comment includes questionable assumptions and pre-empts land use planning decisions to be made by the WAPC (see also discussion for Comment 63)

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
	would result in business failure and job losses.		
67	Council views the draft management plan as a land grab through the identification and targeting of most of the North West Cape as " <i>Land Use and Investigation Areas</i> ".	2e	The draft plan summarised previous and contemporary recommendations of relevance to the conservation estate of the North-West Cape and does not include new proposals. The recommendations have been repeatedly considered in Western Australian Planning Commission regional plans/strategies which consider the full range of land-uses, not just conservation.
68	Restrictions on access to raw materials - It is critical to the maintenance and growth of Exmouth that roads are built and maintained, and access to gravel, limestone and building material continues. Already there are many restrictions on where raw materials can be obtained from, and the land use investigations areas will only place further restrictions.	2e	The land use planning process for these areas will be subject to planning by the WAPC, and this will consider other land use requirements in addition to conservation. The draft plan referred to the Shire's requirements for resource extraction, industrial and other land uses.
69	Map 1 identifies large areas of land within the North West Cape as <i>Conservation and Land Use Investigation Areas</i> . These extensive land investigation areas are unnecessary and will significantly restrict areas for future residential, industrial, tourism or commercial growth, potentially causing the Exmouth townsite to become landlocked due to the limited growth areas.	2e	The conservation values of these areas are not well known or understood. The Department and Conservation Commission supports further investigation to more specifically identify conservation values/conservation management implications.
70	The plan seeks to further increase CALM's land holding over the Cape. Once again the public will be confronted with the same timeless excuses when CALM is confronted by their obvious inability to achieve any gains for the environment citing the lack of funds. Increasing the land holding will do nothing more than create a need for more staff to do the same job just as ineffectively. Why?	2e	Opinion noted.
71	The plan includes a strategy to "liaise with neighbouring land managers to ensure that CALM's visual landscape management guidelines are considered in any development proposal, and providing advice upon request". This, coupled with the fact that CALM will control all resources (e.g. gravel, sand, water etc) will reverse Exmouth's prosperity and make it a holiday town with few locals and the bulk of housing being investment rental.	2g	Strategy 3 in section 27 Visual Landscape refers to liaison and providing advice on request. Such advice would be provided in circumstances where developments have the potential to impact on visual landscape values of the conservation estate. Protection of the visual landscape values within the conservation estate, not outside of it, is the objective. The strategy has been reworded to clarify this.
73	More information should be presented on areas proposed for addition (values, threats etc). The plan should consider values and issues in these areas (i.e. they should be part of the planning area).	2f	These areas are not currently vested with the Conservation Commission and therefore the Department can be limited in its capacity to undertake detailed investigation of values, threats and their management. Broad discussion of the values, threats and management was included. Section 12 of the final plan describes the intended process for management of these areas in the event they are vested in the Conservation Commission or otherwise to be managed by the

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
			Department.
74	Re extensions to the National Park - what independent studies (not CALM or another Government organisation) have been done?	2b	The report by Metcalf and Bamford (2005) referred to in the draft was not prepared by the Department (although was commissioned by the Department). Generally studies/report pertain to the Cape Range peninsula in general. Various relevant reports have been referred to throughout the plan (e.g. Hamilton-Smith <i>et al.</i> 1998, Wyrwoll <i>et al.</i> 1993, Keighery and Gibson 1993, Kendrick 1993).
75	CALM seems to be placing itself in the role of the regional planner for the Shire of Exmouth through this land use investigation proposal. It does seem very presumptive.	2g	The draft plan summarised previous and contemporary recommendations of relevance to the conservation estate of the North-West Cape and does not include new proposals originating from the Department. The recommendations have been repeatedly considered in Western Australian Planning Commission regional plans/strategies which consider the full range of land-uses, not just conservation. The final plan includes amendments aimed at clarifying this point.
76	The Department has largely failed to engage successfully with neighbouring pastoralists for over 20 years and now proposes to resume significant portions of their leases. Relations with pastoralists have been frequently confrontational, often lacking consultation and at times bad-mannered, exhibiting a lack of understanding and communications.	2d	The pastoral lease exclusion process is separate to and beyond the scope of the process of developing the management plan for Cape Range National Park
77	While the proposed additions to the public conservation estate are generally supported, the statutory basis for the future management of these areas under the draft plan is not clearly explained, particularly for coastal areas south of the Learmonth Air Weapons Range. This aspect is confusing since it appears that the draft management plan is being used for both the management of an existing protected area as well as a vehicle for strategic conservation planning. While this may constitute standard practice for CALM in the preparation of management plans, it may have been beneficial to consider both the conservation and land use investigation areas and proposed additions to the public conservation estate separately from the main purpose of the document, that is, a draft management plan for the existing Cape Range National Park.	1e	The plan has been amended to clarify the intentions for management planning of these areas in the event of them being vested in the Conservation Commission or otherwise managed by the Department (see Section 12 of the final plan).
78	It is so important that a community as isolated as Exmouth is has an area to recreate in without the strict conditions placed on those that are locked away as national parks. I was witness to the community bitterness from the mid 1970's to recent times as access to more and more of the town's favourite beaches, fishing spots and weekend	2b	The social conditions in which we live change over time. Today Cape Range National Park receives a substantially greater number of visitors than it did in the 1970s.

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
	camping destinations were closed. By the same token I have seen a more responsible approach to these activities in these coastal areas than was present before the current restrictions.		
79	Comments by the Shire in their petition circular about the draft plan do not reflect what was in the plan.	2b	Agreed.
80	Access should not be improved to the camping spots on pastoral stations as it will detract from the isolation aspect of these regions and also put wildlife at greater risk due to increased pressure from more and faster moving vehicular traffic. If visitors without 4WDs wish to access these remote areas then they should join a licensed tour.	2d	It is now proposed that a separate planning process is to be undertaken in the event of these areas being vested with the Conservation Commission (see Section 12 of final plan). The submission comment is however noted by the Department.
81	Management of camping spots along the coast could follow the line of the current procedures adhered to within Cape Range National Park. Day visit and camping areas could be identified with camping areas coming under CALM jurisdiction but managed by current station leaseholders to give an outback feel to the operation and ease the burden on CALM staff.	2d	See above.
82	The draft has acknowledged that most current users desire a wilderness/isolated experience. This is what every visitor enjoys in the station areas currently outside the park. This experience is becoming rarer but with good management it can still be maintained with minimal environmental impact.	2d	See above.
83	Guidelines for 'negotiating' Conservation and Land Use Areas 1-3 with key stakeholders (i.e. what values will be considered?) should be added to the plan, outlining how alternate uses/values will be scored to compare competing uses and make a recommendation? What appeal processes would there be? Who has final say? Timelines etc	2d	These areas will be subject to planning by the WAPC, and this will consider other land use requirements in addition to conservation.
84	The KPI (page 22) does not promote 'negotiation (of proposed additions), as CALM can maximise this KPI measurement by not negotiating and thereby ensuring all land becomes part of the conservation estate.		No longer applicable as this KPI has been deleted as a result of internal consultation during finalisation of the plan.
85	Maps 1 and 5 appear to indicate that the Cape Range National Park is being increased in area to include Yardie Creek Station Caravan Park and Tantabiddi Boat Ramp within its boundary. The boat ramp has a long history of free public access and Recfishwest believes it is important that this area and the access roads remain as free boat launching facilities.	1e	The Conservation and Land Use Investigation Areas identified in Section 12 of the draft plan did not include the Tantabiddi Boat Ramp, and this facility is not proposed for addition to the conservation reserve system. However, it is acknowledged that Map 1 was not adequately clear regarding this. Map 5 shows the regional land use plan as it appears in <i>Ningaloo Coast Regional Strategy</i> . Yardie Creek Caravan Park is not proposed to be added to the conservation reserve system.
86	Recfishwest is concerned that the management plan will result in a	1e	The Conservation and Land Use Investigation Areas identified in

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
	substantial part of North West Cape coast vested as a National Park with the potential to implement fee paying access to this stretch of coast. Free access to our beaches has always been a Western Australian tradition and it is an election promise of the current Labor Government. For this management plan to go against this policy would be a gross injustice to the West Australian people.		Section 12 of the draft plan did not include beach/near coastal areas. However, it is acknowledged that this was not adequately clear through Map 1 because the western boundary of the Conservation and Land Use Investigation Areas was over the boundary for Yardie Creek Road. The beach areas to the north of the existing park are not proposed for inclusion into the national park.
87	While it is prudent for the Department to identify and earmark potential future additions to the conservation estate, a Local Planning Study (LPS) is the most appropriate instrument for this to occur, in order that potential additions to the estate are considered in broader comprehensive land use framework.	2c	Proposals in the plan are consistent with regional planning strategies which considered broader land use. The WAPC will undertake planning for the areas identified for 'Conservation and Land Use Investigation'.
88	Recfishwest's prime concern with the management plan is with community access to popular fishing locations and facilities and the potential introduction of an access fee to the extended National Park.	2d	See discussion for Comment 61. The issue of the Department charging access fees in pastoral exclusion areas along the coast would be considered in the event of the Department being responsible for the management of these areas. Visitor fees are considered and reviewed in line with the Department's broader policy regarding this issue.
89	The proposed World Heritage Listing boundaries conflict with what is proposed in the Draft Management Plan.	2g	Non-inclusion within a World Heritage nomination area does not mean that an area does not potentially have values that might nonetheless warrant inclusion within the national reserve system.
90	Main Roads has an ongoing requirement for use, maintenance and replacement of water bores located outside the Cape Range National Park, but likely within the same water catchment, for road maintenance and improvement purposes.	2b	Noted. Maintenance of hydrological regimes (quantity and quality) is essential for the conservation of groundwater dependant species and communities within Cape Range National Park. These include specially protected (under the Wildlife Conservation Act) and globally significant species. DEC will take action, such as making recommendations to the Department of water regarding proposals, as necessary to protect natural hydrological regimes and groundwater dependent ecosystems.
91	It is stated on page 15 of the plan that "it is appropriate that CALM and other relevant stakeholders work to more fully identify values and land uses/management options" of <i>Conservation and Land Use Investigation Areas</i> . The Western Australian Speleological Group would like CALM to ensure that speleological expertise is included in the decision making and planning process of reserves for "Conservation and Limestone Resource Management" and in the 2015 pastoral lease exclusion process.	2b	These areas will be subject to planning by the WAPC. DEC will draw on all relevant expertise that it considers necessary to obtain information to be conveyed in that planning process.
92	Opposed to the inclusion of the Jurabi and Bundegi Coastal Parks into Cape Range National Park. The current management of these areas is sufficient and our experience has shown that locals and visitors using	2g	The management plan does not propose addition of these areas to the national park or change in the current management arrangements. See discussion for Comment 61.

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
	these areas respect the natural values and abide by the regulations already in place.		
93	The Department of Local Government and Regional Development shares the Shire of Exmouth's concerns that the maps contained in the Draft Plan do not convey the same information as the text of the document. In particular the maps should mirror the wording, which reflects the current situation with regard to the Shire's future growth and access to resources. The Department supports the Shire's request to alter the maps so that the plan is consistent and does not cause confusion and uncertainty.	1e	Map 1 conveys broad tenure and is not a land use map. The scale of the map does not allow the detail of various vested Crown reserves to be adequately shown, and a new map is not warranted as this information is not of immediate relevance to planning for the national park. The map has however been amended to indicate that the Crown reserves category includes a range of variously vested crown reserves.
94	Map 1 contains incorrect uses and does not acknowledge current and proposed uses or private owners.	1e	The map being referred to in this submission was correct with respect to conveying broad tenure, which was its intended purpose. However, as discussed above, the map has been amended for clarity.
95	The area proposed for addition to the public conservation estate includes Coral Bay but excludes Maud's Landing townsite. Clarification should be sought from the Ningaloo Sustainable Development Office relating to the future declaration of Coral Bay as a townsite in lieu of Maud's Landing. The Water Corporation plans to construct additional infrastructure assets within the Coral Bay area. It is considered pertinent that the Coral Bay townsite and associated existing and proposed infrastructure be excluded from the proposed conservation area in order to recognise its status as an "urbanised" area that has servicing requirements.	2d	DEC will now consider management of the coastal pastoral exclusion areas vested or proposed to be vested with the Conservation Commission, as part of a separate planning process (see Section 12 of final plan). Any coastal pastoral exclusion areas vested in the Conservation Commission would not include the Coral Bay townsite or other areas identified by Department for Planning and Infrastructure as necessary for associated infrastructure developments.
96	Clarification is sought that recommendations in Section 36 <i>Utilities and Services</i> do not impact on Main Roads operations related to the Minilya-Exmouth Road and within the designated road reserve.	2b	DEC acknowledges Main Roads/Shire of Exmouth management role with respect to road reserves. The Minilya-Exmouth Road does not impact on the Cape Range National Park or proposed additions to it. It is DEC's responsibility to take appropriate action as necessary to prevent or minimise impacts of future road management operations on the ecological and other values of Department managed lands.
97	Separate the existing management plan for Cape Range and take out the additions/inclusions of lands to the back of the plan (this has been very confusing for the local population).	2e	The proposed additions etc are discussed in the section on biogeography as additions are sought to contribute to the development of a comprehensive, adequate and representative reserve system for the protection of Australia's biodiversity. Any confusion amongst the local community regarding proposed additions is unlikely to be related to where in the plan this discussion was situated.
98	The Water Corporation requires that the proposed "Conservation" designation will not hinder the possible extension of the bore field in the future.	2d	These areas will be subject to planning by the WAPC and will involve consideration of a range of land-use interests and consultation with all key stakeholders.

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
99	The Water Corporation is considering relocating the existing wastewater treatment plant at Exmouth due to its close proximity to the town. A suitable alternative site may be extremely difficult to identify given the constraints associated with the areas designated as proposed or potential conservation areas.	2d	See above.
100	Are 'special' tourism leases (P95) sensitive and sustainable in their local area?	2d	DEC will now consider management of the coastal pastoral exclusion areas vested or proposed to be vested with the Conservation Commission, as part of a separate planning process (see Section 12 of final plan). The special tourism leases are not administered by the Department. However, developments within these leases should be managed in accordance with associated conditions (including environmental protection conditions) and consistent with the overarching planning strategy (the Ningaloo Coast Regional Strategy Carnarvon-Exmouth).
101	There is concern that the draft plan includes the Tantabiddi Boat Ramp within the Cape Range National Park boundaries. Submitter wishes to register strong opposition to the inclusion of this public facility if it is the case. Should the Jurabi Park be included in the conservation estate in the future, Tantabiddi should be excised from it.	1e, 2g	See discussion for Comment 61.
102	Conservation Land Use and Investigation Area 1 and 2 would stop expansion of the town, mean my kids will have to leave town for work, contribute to Exmouth becoming stagnant and allow DEC to completely control the land surrounding the town.	1e, 2g	These areas will be subject to planning by the WAPC and will involve consideration of a range of land-use interests and consultation with all key stakeholders. The assumption that land reserved for conservation would lead to socio-economic stagnation is questionable as recreation and tourism within Cape Range and Ningaloo conservation reserves generate significant socio-economic benefits to the region. This is discussed in a report by Carlsen and Wood (2004) which assessed the economic value of recreation and tourism in Western Australia's national parks and marine parks.
103	The draft plan does not clearly express what will happen to the pastoral leases due to expire in nine years. Will they form an extension of the National Park?	1e	Vesting and management arrangements for these coastal pastoral exclusion areas have not been finally resolved (as described on page 17 of the draft). This includes the tenure and purpose. In the event that these areas are vested in the Conservation Commission or otherwise managed by the Department, separate/new management planning processes would be undertaken and the final management plan has been amended to explain this (see Section 12 <i>Biogeography</i>).
104	The community are very sceptical and cynical of plans produced by CALM (Ningaloo sanctuary zone example given), and are tired of plans that limit further use and access to the region, particularly when	2e	See discussion for Comments 3, 60, 64, 65, 67, 89 and 352 for some responses to Shire's submission.

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
	there is already a significant portion of the North West Cape covered by National and Marine Parks. If CALM wish to maintain the support of the Exmouth community, and the broader western Australian community who visit the region, the Draft Management Plan must be changed (as suggested in the Shire of Exmouth's submission).		
105	In the interest of continued community support of CALM it is extremely important that the local community be allowed to take pride and guardianship of what they consider to be their 'local beaches'. Therefore the coastal area from Tantabiddi in the south, Vlamingh Head and Bundegi in the north to the Cape wilderness on the east coast should be left to the care of those that currently use it (and not included in the national park).	2g	The management plan does not propose addition of these areas to the national park or change in the current management arrangements.
NATURE CONSERVATION			
Nature Conservation (General)			
106	All the Department has done in managing the natural environment so far is to "put up coppers logs and charge us nine dollars to go to the beach".	2b	Opinion noted.
Climate Change			
107	This section on climate change reads like someone else has written it. It doesn't flow and should be re-written to read better.	1b	Noted.
108	We recognise that the impacts from changes in climatic conditions are important. As climate changes are outside the control of anyone in the next 10 years, we would prefer to see resources put into tangible controllable issues and impacts e.g. what flora and fauna do we have and how can we best protect it?	2b	There are numerous strategies aimed at improved understanding and protection of the park's flora and fauna. The plan also includes strategies to identify flora and fauna species at particular risk of climate change and identifying measures to conserve these (e.g. Strategy 6 on page 38, Strategy 11 on page 14 of the draft).
Ecological Water Requirements			
109	Focus is needed on gaining the necessary scientific understanding to support realistic Environmental Water Requirements for the aquifer (submission provides more detailed examples of what it is considered this research should include).	2c, 2h	The need for research into EWR is incorporated into the plan (Strategy 10 in Section 15 of the draft). Details of what this research should include can be considered in the course of implementing the plan and changes accommodated as necessary over the life of the plan.
110	EWR values must consider natural variation as this is not static.	1e	Agreed. The wording of the KPI has been amended to make this explicit.
Environmental Weeds			
111	What is going to be done regarding kapok, stinking passion flower and great broom?		These will be managed according to strategies specified on page 51 of the draft. Detailed weed control measures for these species is considered through the development of the prioritised weed control plan required under strategy 1 of page 51.

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
112	A community education program would educate and empower the local community in helping to identify and eradicate weeds.	2c	This issue is addressed in Strategy 7 on page 51 of the draft plan.
Fire Management			
113	The Department cannot allow naturally ignited fires to burn on the top of the range in the absence of control options such as low fuel buffers. Previous fires that emanated from or near the Range have affected adjoining pastoral areas, and the Bombing range and facilities.	1a	The final plan includes strategies to reduce the risks associated with wildfires.
114	A proactive fire management plan is needed. There is already useful knowledge of fire behaviour and ecology with Spinifex communities and the establishment and maintenance of wind-driven or open-edged burn buffers. The plan needs to state that adaptive fire management strategies will be developed to provide a diversity of fire regimes and treatments to maintain biodiversity.	1d	The plan has been amended to provide a more proactive approach to fire management.
Geology and Karst			
115	Why aren't the dunes on the top of the range (e.g. Sandy Bay Track) included in the comments about red dunes? Are they different?	1e	This dune field is much smaller and is differently orientated (i.e. south-west versus north-east orientation) to the red dunes to the north of the park. The conservation significance of this is not known. The plan has been amended to include reference to this.
116	Map 3b would be enhanced if we knew for each site why it was listed and where important features in the 'designated' hatched area were located.	2c	The reasons for the designations (as provided by Geological Survey of Western Australia Division of the Department of Industry and Resources) are explained within the text of the draft plan, on pages 29 and 30.
117	It is excellent to see the first page and the Key Values <i>section</i> contains statements relevant to karst. It is also good to see that there is acknowledgement of the vulnerability of karst systems.	2a	Support noted.
118	Section 14 outlines the importance of karst on the range. We would like CALM to update this and to substitute the term "caves" for "caves and karst features" (as the ASF records and numbers "karst features" (which include for example caves, dolines, springs, and blowholes)). Please note that there are currently over 800 karst features (D. Brooks 5/2006).	1e	Amendments made.
119	Section 15 "Water Catchment Protection". We consider these sections as excellent. The IUCN Guidelines on karst management highlight the need for an integrated management approach to managing karst areas.	2a	Support noted.
120	It is excellent to see that Section 28 acknowledges that the Cape Range karst system and the fauna it supports have conservation significance. It is also stated that the caves of Cape Range also have significant cultural and research values. These statements are important and the	2a	Support noted.

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
	Department is supported in acknowledging these issues.		
121	P 86. The WASG supports the initiative to implement a permit and registration system. CALM needs accurate data regarding visitor use to enable assessment of visitor impacts on caves.	2a	Support noted.
Introduced Animals			
122	Continuation of the Western Shield fox eradication program is supported.	2a	Support noted.
123	Feral animal control - all local pets should be sterilized, preferably no cats at all.	2f	Although Department does not have the authority to require sterilisation of pets or ban cats, it is supportive of measures that promote responsible pet ownership.
124	The 1080 baiting program should be replaced by other methods close to the township. There have been too many instances of pet dogs taking these baits.	2e	The Western Shield program has delivered important predator control and assisted with the protection of biodiversity. There are protocols in place that set minimum distances for baiting in proximity to towns and settlements. 1080 baiting areas are well signposted to ensure pet owners are informed about risks to pets. The Department of Defence also undertake 1080 baiting, but also ensures areas are signposted. The risks to non target animals are very small if owners take necessary precautions within and around baited areas.
125	Suggest CALM demonstrates a greater commitment to localised cat control. Cat control in CRNP is currently virtually non-existent. The difficulties associated with managing feral cats is acknowledged. It is recommended that a formal system for reporting cat sightings is developed and implemented, that visitors and tour operators are educated regarding the value of cat control, and that CALM promptly acts on such reported cat sightings and is accountable for following through with cat eradication.	1e	Suggestions will be taken into consideration by Department's Exmouth District office. The plan notes that the Department is still in the process of developing improved baits for cats, and includes a strategy for control of this feral predator (page 55 of draft plan). The plan has also been amended to include a strategy for cooperative management measures with the Shire to promote responsible cat ownership.
126	P 55, KPI 9. Indicates that goats are the only predator to be monitored (& perhaps foxes under KPI 7). What about euros, cats etc?	2f	It is not feasible to measure every aspect of management directly and therefore the identification of performance indicators is centred on the assessment of the key values and those issues requiring the most immediate attention. Goats and foxes have been identified as being amongst the most critical issues requiring attention over the life of this plan. Nonetheless, the impacts of cats and euros will be to some extent indirectly assessable through other KPIs (e.g. 4a, 4b, 5a, 5b, 7).
127	If you just attempt to start your efforts with this heading (Managing the Natural Environment) you might actually look like a national park management group rather than managers of the largest caravan park on the west coast. As stated by your own scientists, lets start by culling kangaroos, once and for all managing the feral goat problem, work	2c (1e on cats)	The draft plan included strategies that address the concerns raised regarding the management of high populations of euros and feral goats. Assessment of the plan's performance will include assessment of the Department's goat control management (i.e. Key Performance Indicator 9). The plan also referred to the undertaking of research to clarify the

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
	with the Shire to ban cats from the Exmouth townsite. Cats should be banned permanently from any towns bordering a national park.		impacts of kangaroos (i.e. the contribution to total grazing pressure on the coastal plain vegetation). See discussion above regarding cats.
128	Dealing with foxes by dropping baits from a plane seems to be loosely targeted.	2e	This method has proven to be the most cost effective and efficient way of dealing with foxes given their widespread distribution.
129	Aerial shooting of goats does not seem cost effective due to the difficulties with identifying straying stock and with locating goats in caves and along dry creeks with substantial cover.	2c	The plan acknowledges difficulties with aerial shooting of goats and that this will not always be a feasible option.
130	The Western Australian Field and Game Association could continue to provide a cost free resource and work co-operatively with CALM and pastoralists to limit the impact of goats on biodiversity values, and continue to provide the resources necessary to assist in the management of goats in the plan area.	2c	Noted. The plan provides for the Department to utilise authorised organised groups for goat control where appropriate.
131	Problem feral animals like goats should be permanently fenced out from environmentally sensitive areas.	2c	The plan provides for the implementation of measures to exclude goats from particularly susceptible areas. A comprehensive fencing program would be expensive and operationally difficult to achieve with the current boundaries.
132	Shooting is inhumane, especially when goats are purposefully shot within the canyons to watch them fall to their death. I have heard this described by the shooters as "fun to watch".	2e	Goats are one of the most significant threats to the park's native flora and fauna values, and their removal is an important aspect of protecting these values. Shooting using <u>licensed and professional</u> shooters can be a quick and effective way of removing this introduced species without subjecting the animal to the stresses from capture and handling. Control by trapping is extremely difficult in the remote and rugged terrain of the park.
133	A contract with professional hunters would be more direct and effective in dealing with goats than would allowing sports shooters into the park a couple of times a year.	2c	Opinion noted. The plan does not specify whether the type of group that would be employed for this task and so professional hunters or sports shooters could be used. Any sports shooters used would be required to conduct the activity in a professional manner.
134	Greater attention should be given to goat control and management programs. Goats appear to be having a major environmental impact and current control programs appear to be relatively ineffective. It is acknowledged that the reclassification of goats to "authorised" stock and the value of the goat meat industry to pastoralists compromises the efficiency of goat eradication.	2c	The plan acknowledges this as a significant issue and consequently includes strategies for goat numbers to be controlled and a Key Performance Indicator to facilitate measurement of the effectiveness of these strategies. The plan also allows for management to be adapted as necessary (e.g. in response to performance assessment) over the life of the plan. Around 1200 goats were removed from the park in a 2007 muster.
135	The Department should prioritise goat eradication (together with cat and fox control) by implementing frequent, systematic goat culling, using helicopters to access gorges in multiple locations (not just Yardie Creek), and progression of a statutory requirement for pastoralists to	2c	The plan includes a number of measures to address the threats associated with goats, including strategies for goat culling as suggested by the submitter. The plan also includes a Key Performance Indicator to facilitate measurement of the effectiveness of these strategies - Key

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
	manage their stock (<i>we would like to assist/support if possible</i>).		Performance Indicators are reflective of management priorities. There is currently little statutory requirement for pastoralists to prevent movement of their stock onto adjacent lands, however, the Department will seek to work in collaboration with individual pastoralists and the Pastoral Lands Board of Western Australia to develop strategies that can achieve this.
136	Delete "in particular.....plains" from Point 4 on page 55.	2e	The issue of increased nutrient and sediments loads is discussed under <i>Goats</i> and warrants highlighting in the strategies.
137	Whilst the management plan suggests that the small numbers of rabbits currently pose minimal threat to the conservation values compared to goats and euros, anecdotal evidence suggests that rabbit populations have noticeably increased over the past 18 months in numerous areas on the Cape. Furthermore, rabbit control may become a significant issue if pastoral land, which may be inundated by rabbits, is to be included in the conservation estate. We suggest that the management plan include provision for monitoring of rabbit populations in the conservation estate and adjacent lands, and strategies for rabbit control. (Suggestions for rabbit control are included in submission, and a link to the WA Department of Agriculture website).	1e	Noted. Some amendments made to the plan.
Native Animals			
138	Dingos are not absent from the park and therefore the sentence "The park is though to be supporting an unnaturally high population of euros due to the absence of hunting by dingoes....." should be changed to refer to "reduced hunting by dingoes".	2g	Whilst hybrid dogs are present in the park, dingoes are believed to be absent. The dog baiting program applied in the park assumes that all dogs would be hybrid species.
139	What are the threats against the bat populations, birds and reptiles and amphibians (other than turtles) and how are these going to be managed?	1e	General threats to the park's native fauna such as habitat degradation and loss are highlighted in the introduction to the <i>Native Animals and Habitats</i> section and then specific strategies to address these are detailed throughout the plan where relevant (e.g. to address issues such as environmental weeds, introduced animals, hydrology). Some minor amendments have been made to the introduction <i>Native Animals and Habitats</i> to highlight that recreation management strategies have also been included in the plan where necessary to prevent disturbance of fauna through inappropriate recreational use.
140	Page 47 Key Performance Indicators table: Agree with all points.	2a	Support noted.
141	What are the population estimates of the rock wallabies? How can you regulate the boat trips if you don't know this? What has happened to setting a baseline to measure the impact of tourism against? What other threats are there?	2c	As mentioned in the plan, research into rock wallaby populations of the Cape Range Peninsula was underway but incomplete at the time the draft plan was prepared. The plan has been amended in response to information now available as a result of this research. Establishment of

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
			baseline measures for rock wallaby populations is implicit in Key Performance Indicators 5b and 6. The Department employs a precautionary management approach in regulating boat trips on Yardie Creek. Other actual/potential threats to rock wallabies are discussed throughout the plan where relevant (e.g. rock climbing/abseiling, pedestrian access).
142	Redevelopment of the walk trail on the northern side of Yardie Creek needs to clearly identify the sanctuary area to the east to protect rock-wallabies from disturbance.		Comment noted. Detail such as this is considered in site level development planning.
143	Developing Bloodwood Gorge as a minor camping site is not supported as it is a significant site for the Black-footed rock wallaby. Alternative sites not inhabited by rock-wallabies should be selected. Potential sites should be surveyed for the presence of rock-wallabies prior to development to ensure they or their habitat will not be compromised.	1a	In recognition that rock wallaby research outcomes would be available subsequent to the release of the draft plan, the plan included flexibility of implementing proposals if necessary (e.g. Table 6 refers to Pilgonamun "or an alternative inland site" and Strategy 1 on page 99). Some amendments have been made throughout the plan in response to the new information regarding rock wallabies.
144	Further development of Mandu Mandu Gorge as a day use site is not supported unless such development considers, controls and mitigates the impact of visitors on the black-footed wallabies that inhabit the area. It is recommended that further research into the distribution of rock wallabies at the site is conducted, that development of walk trails and suitable infrastructure minimise visitor impact on rock wallabies, and that visitor impacts are monitored over time.	1a	See above.
145	The development of Pilgonamun Gorge as a medium camping site is strongly opposed as it is a highly significant site for the Black-footed Rock-wallaby (reasons including findings of 2005 study detailed in submission). Instead, it should be designated as a sanctuary area, perhaps allowing people to view the rock-wallabies, but restricting access to areas in the gorge that may disturb the animals. Additional possibilities include: development of managed rock-wallaby interaction (e.g. guided tours, viewing platform with interpretive material); or downplay (i.e. do not promote) the recreational significance of the site so that it continues to be a minor attraction.	1a	See above.
146	Management of the sanctuary area on the southern side of the Yardie Creek gorge system should include interpretation and education, more visible signage, clear delineation of sanctuary areas and enforcement/infringement actions. The southern area of Yardie Creek is currently poorly managed and regularly used by visitors despite its designation as a sanctuary area.	2b, 2c	Measures such as these are provided for in the plan. The Department is currently in the process of developing upgraded signage, and this will be installed in the near future.

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
147	Support for the maintenance of access restrictions along the southern side of the Yardie Creek gorge system.	2a	Support noted
148	P. 95 The seasonal closure of significant turtle rookeries to vehicles is strongly supported to protect nesting turtles and hatchlings on the beaches. Beach closures implemented by the Department need to be effective (i.e. not just a sign or few bollards that people can remove) and enforced during the nesting season.	2a	The Department will consider requirements for effective enforcement of any beach closures.
149	CCG requests that the management plan also makes provision for the following actions: (1) consider seasonal closure of important turtle rookeries with significant visitation (e.g. Hunters, Mauritius, Wobiri, Janz etc) during the nesting season to visitors who are not accompanied by a guide or tour operator); and (2) implement enforcement and education to ensure that turtle watchers and beach users do not disturb nesting turtles. These factors play a critical role in protecting marine turtles on the North West Cape region.	2c, 2d	The rookeries mentioned are outside of the planning area, within the Jurabi and Bundegi Coastal Parks jointly managed by the Department and the Shire of Exmouth - a separate management plan applies. The plan for Cape Range National Park includes provisions for restricting access and information/education to minimise disturbance to nesting turtles.
150	In addition to WA Museum research, surveys for stygofauna have been done by other research institutions or as a result of Environmental Impact Assessments and Ministerial Conditions on proponents in the Exmouth/Cape Range area. A search of Department of Environment, Environmental Protection Authority and Department of Water licensing conditions would identify previous or current stygofauna monitoring in the Cape Range region.	2b	Noted
151	Page 46, Paragraph 5. Point 1 - limited access points within the national park may be responsible for lack of known subterranean fauna?	2c	Agreed that this may be a contributing factor. Further research into the distribution of subterranean fauna was proposed under Strategy 5 on page 48 of the draft plan.
152	Page 46 last line: This statement should be clarified by explaining why the subterranean fauna has a very limited geographical range, so the reader understands.	1e	Some amendments have been made.
153	Section 17: Agree with statements made in sub-sections "Cape Range Subterranean Habitats" and "Subterranean Fauna" and the references quoted are current and accurate.	2a	Support noted.
154	Page 52 Table 2: It is not valid to lump dingoes with wild dogs - these should be separated and the correct species name for dogs should be used as opposed to using the dingo species name for both. The plan inconsistently refers to dingoes/dogs (also on Page 54 in Paragraphs 4 and 6).	1e	Some amendments have been made to aid clarity.
155	There should be an ongoing monitoring program of the impact of boat tours on Yardie Creek.	2c	Monitoring of the impacts of activities such as the boat tours at Yardie Creek on the values of the park will occur through the plan's

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
			performance assessment provisions (e.g. KPI 6 which includes visitor related impacts on rock wallabies and nesting birds).
156	As studies of fishing effort at Yardie Creek have not been conducted, it cannot be said that over fishing or other long-term adverse impacts are unlikely. Fishing should be banned at Yardie Creek or only allowed west of the boat landing when the mouth of the creek is open and in conjunction with fish population studies.	1e	Opinion noted. Some amendments have been made.
157	Given that "the impacts of fishing within an intermittently closed system are not clear" (p 81), continuation of unmanaged fishing in Yardie Creek is strongly opposed. It is extremely inappropriate to condone the extraction of (larger) fish from a closed and balanced ecosystem, particularly when implications of such are unknown. The plan makes no reference to monitoring or assessing the long-term impact/s of fishing in Yardie Creek. Fishing should be prohibited in Yardie Creek at all times until the impacts have been scientifically evaluated, or, less preferably, be prohibited at times when the creek is closed to the ocean by the sand bar, and the impacts on the ecosystem monitored.	1e	Opinion noted. Some amendments have been made.
158	Conflicting messages are presented re "Euros" - a problem animal on p 54 and wildlife to be viewed on P 95.	2e	It is not that Euros are present within the park that is the problem as they are a native species. Rather, it is their (possibly) altered population dynamics (e.g. distribution and/or numbers) that may be a problem. These references are therefore not considered to be in conflict with each other.
Native Plants			
159	Are the plant communities represented in the reserve system adequately? Any <10% of pre-European extent remaining? Any < 30%, any with limited extent i.e. <2000 ha?	1e	
160	What are the flora of the park? There is no appendix for flora in the park, although there is for fauna.	2c	The fauna list is of threatened fauna - no threatened flora has been identified within the park. There is currently a lack of comprehensive knowledge of the park's flora. This is acknowledged in the plan which identifies vegetation mapping and floristic survey as significant data gaps and includes a strategy to develop a more comprehensive spatial inventory of plant species and communities. Flora lists are obtained from the WA Herbarium as required to ensure the most up to date data is used.
161	Look at preserving or at least protecting the natural flora in the park. The buffel grass has all but taken over the native grasses, and considering the park has been in place for nearly 2 decades it is the	2c	The draft plan includes strategies for protection of native flora (see Native Plants and Plant Communities on pages 35 to 39). The plan identifies buffel control as one of the most significant weed

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
	worst representation of the Cape's native flora pre-white settlement on the entire North-West Cape, as stated by your own scientists.		management issues in the park, and includes strategies regarding the control of this weed. It also includes a Key Performance Indicator that will be used to assess the effectiveness of measures to control priority weed species.
162	Disjunct Flora: Yardie Creek has limited populations of the native bulrush. The rest of the text in this section should be deleted.	1e	Text amended
163	What are the priority flora and fauna species in the park, what are the threats to these species and what is going to be done to manage them?	1e	Species are removed and added from priority flora lists on a reasonably regular basis and therefore lists within management plans become dated. Priority species currently recorded for the Park includes 6 Priority 2 species: <i>Harnieria kempeana</i> , <i>Verticordia serotina</i> , <i>Abutilon</i> sp. <i>Cape Range (AS George 1312)</i> , <i>Acanthocarpus rupestris</i> , <i>Eremophila occidens</i> and <i>Daviesia pleurophylla</i> ; 6 Priority 3 species: <i>Stackhousia umbellata</i> , <i>Corchorus interstans</i> , <i>Acacia alexandri</i> , <i>Grevillea calcicola</i> , <i>Acacia startii</i> ; and 1 Priority 4 species: <i>Brachychiton obtusilobus</i> . The plan has however been amended to include more specific mention of priority species.
Ramsar Nomination			
164	It is basically correct that the Department of Defence is considering Ramsar Convention wetland nomination of Bundera Sinkhole and associated karst system within the Bundera Coastal Protection Area to the south of the Park. However the current approach (discussed with CALM wetlands group in 2005) is that the Bundera Sinkhole system be included in a single, combined nomination with CALM for the NW Cape karst system (i.e. for the National Park, the Bundera Sinkhole system and the extensions of this and other systems into Ningaloo Marine Park).	1e	Noted. The plan refers to consideration being given over the life of the plan to nominating the park's subterranean wetlands for inclusion on the list of Wetlands of International Importance.
Rehabilitation			
165	Strongly support the proposals that prevent degradation and facilitate rehabilitation of degraded regions of CRNP. Particular areas of concern include dunes, such as the blow-out at Yardie. Suggest that fragile areas, including dunes, could be listed (mapped) and rehabilitation strategies developed. Driving on dunes and fragile areas should be prohibited and prevented.	2c	There is generally, already adequate understanding of which areas within the park are particularly susceptible to disturbance impacts, such that further comprehensive mapping is unlikely to be necessary. Other suggestions are already covered in the plan.
CULTURAL HERITAGE			
166	There are no places within the planning area that have been entered into the State Register of Heritage Places or identified for future assessment as part of the Heritage Council's Current Assessment	2c	This is stated in the plan.

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
	Program.		
167	The study area includes four places included in the Shire of Exmouth's Municipal Heritage Inventory. Appropriate consultation should occur with relevant authorities to determine whether the management plan has implications for any places of local significance.	2b	The Shire of Exmouth and the Heritage Council submissions to the draft management plan have not raised any issues regarding the impacts of the management plan on local heritage values.
168	Support for the establishment of a database of sites/artefacts of potential historic significance.	2a	Support noted.
169	If sale, transfer, lease, demolition or significant modification is proposed for any places meeting the requirements of the Government Heritage Property Disposal Process, a referral will need to be made to the Heritage Council for its consideration prior to any action affecting the place occurring.	1e	Specific reference to <i>Government Heritage Property Disposal Process</i> now included.
170	Historic shipwrecks and associated relics over 75 years old are protected by the Commonwealth Historic Shipwrecks Act 1976. while not yet located some of these are believed to lie on reefs offshore Cape Range National Park. Any pre-1900 shipwreck material, including survivor's and salvager's camps found above the high-water mark is protected by the State Maritime Archaeology Act 1973. Any finders of shipwreck material must report their find to the Director, Western Australian Museum.	1b	Noted. Text amended to include reference to State and Commonwealth legislation for the protection of historic shipwrecks. Other general information on Maritime Cultural Heritage provided with this submission will be stored in the Exmouth District for possible use in interpretive materials.
171	The recreational use of areas that are of significance and importance to Aboriginal people and that contain heritage sites needs to be considered. There have been reports of disturbance to cave sites in the area (e.g. through graffiti).	2c	The plan identifies the importance of protecting sites of Aboriginal Heritage significance. Damage or disturbance to naturally occurring features on CALM managed land is prohibited and the Department will do all it can to prevent this. Infringements can be issued under the Conservation and Land Management Regulations 2002 where perpetrators are caught.
172	The Draft Management Plan is a great beginning for Aboriginal people to be involved in the management of their heritage and the land in the Cape Range area.	2a	Support noted.
173	An emphasis on a communication program to assist with managing public access to Aboriginal Heritage Sites is definitely needed as part of managing the cultural heritage of the Park.	2c	Support for provisions in the draft noted.
174	Correct spelling of Thalanyji not Thalandji is preferred outside of quoted material (e.g. Tindale, Austin spellings) when mentioning Thalanyji.	1b	Plan amended.
175	Page 61: The Park Council would like the last sentence on paragraph 2 to read, " <i>Gnulli' means 'all of us' and the group, which includes representatives of several language groups (i.e. Thalanyji, Baiyungu</i>	1b	Plan amended.

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
	<i>and Ingadda</i>) is recognized by the Aboriginal community". This leaves out the part of the sentence "as custodians of Aboriginal culture for the area" because the Gnulli Working Group do consist of representatives of the language groups but they are not necessarily the custodians of Aboriginal culture in an area.		
176	P 63 Performance Measure 12 (Degree of satisfaction amongst traditional custodians regarding the level of Aboriginal involvement in park management): The Park Council would like to see the reporting requirements changed to every 2 years rather than 3 years as stated in the draft plan.	1b	Plan amended.
177	Strategy 4 Page 116: The sentence should be changed to read "ensuring that traditional custodians (e.g. through the Coral Coast Park Council or equivalent) are recognized through interpretive material in which they have had a primary and active role in developing pertinent to Indigenous Cultural Heritage". -	2c	These principles are incorporated into the plan.
178	We have very little cultural heritage here as far as Aboriginals are concerned. They don't want to live here, according to local legends, so why should we encourage them to come here?	2b	A native title claim has been registered for the area - determination is pending.
179	There seems to be inadequate coverage of indigenous cultural heritage. For something so important, 2-3 pages seems irreverent. It is recognised that the plan does state that knowledge of the area has been poorly documented.	2e	As indicated in the plan Indigenous cultural history and knowledge of the area has been poorly documented, however the Coral Coast Parks Advisory Committee have stated that this does not mean that such knowledge does not exist amongst local Indigenous groups. It is up to the traditional custodians to what extent they share this knowledge with the broader community, and information may also be held back due to a range of reasons, including for example the native title claim determination which is pending. This plan was subject to consultation with the Coral Coast Parks Council, and the Indigenous Cultural Heritage section endorsed by them. Further, the Park Council will have an ongoing key role in the communication of further information regarding their cultural heritage. The amount of pages dedicated to this in the plan does not reflect the relative importance that the Department and Conservation Commission places on ensuring that cultural heritage values are protected, and the plan includes a number of strategies to this end.
180	P 63. KPI 11. Target of no reduction suggests that no emphasis will be given to documenting new sites identified.	2e	The <i>Aboriginal Heritage Act</i> provides for the protection of sites whether they have been entered on the register or not. Strategy 2 on page 63 refers to the need for management to be consistent with that Act. While precautionary assessments will be necessary where there is

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
			a potential threat to sites, it is not proposed over the life of this plan to necessarily undertake comprehensive survey for new sites not at risk of loss or damage.
181	The plan could be improved by including maps with the location of Aboriginal sites and caves.	2e	The Department does not generally include information on the locality of Aboriginal sites or caves in published material - this assists in the protection of sites from deliberate damage/vandalism that can occur from time to time. Further, the publication of information regarding the location of Aboriginal heritage sites is generally not supported by traditional custodians.
182	Concur with Part D of the plan	2a	Support noted.
RECREATION			
Recreation (General)			
183	25, 28, Table 3 - I believe it is important to recognise and identify the uses of each node but further development will ultimately be detrimental to the integrity of the park.	2e	Recreation is a legitimate and important use of national parks. The plan includes numerous provisions aimed at ensuring that recreational use does not compromise natural and cultural values. Development (e.g. site hardening to make it more robust to higher levels of recreation) can be one way of managing visitation impacts on the environment.
184	The regional branch of Department of Sport & Recreation and DEC should formalise approaches to the development of mutually beneficial projects (e.g. develop products, infrastructure, and events).	1d, 2d	The Department supports the principle of formalising cooperative management arrangements with other government agencies. DSR Regional staff should contact DEC's Pilbara Regional Manager to further discuss formalising management arrangements.
185	A separate and detailed recreational management plan should have been written and added to the overall document.	2d	The management plan sets out the broad strategic direction for the next 10 years. The development of subsidiary more detailed plans are developed as part of the plan's implementation.
186	Recreation was not covered sufficiently. Nor was the crux of having a national park....conservation. The plan is completely different to the Ningaloo Marine Park, which almost entirely embraced (conservation) by ensuring species diversity, conservation of fish stocks, water qualities etc. This plan is more about addressing the future needs of tourism. Then again the Parks and Visitor Services department of CALM do have a vastly different mission statement. The plan should be about both people management and conservation with greater emphasis on conservation, restoration and enhancement of the natural values of the land you have been entrusted with. I believe that the status quo will be maintained with little change in that direction at all as stated. The plan does nothing more than seek to increase visitor numbers, adding larger camps and basically commercialise the park	2c, 2e	The management plan sets out the broad strategic management direction for the park over the next 10 years, both for conservation and recreation. Subsidiary more detailed planning occurs as part of the plan's implementation. Conservation management issues are primarily covered in Part C of the management plan.

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
	further.		
187	It is of concern that the survey conducted by Polley (2002) has been used as the basis for numerous management propositions in this plan. This survey was conducted in peak visitor season, a time when the park is largely avoided by locals, the majority of whom use the park on multiple occasions over the remainder of the year, outside peak tourism seasons. The survey is therefore potentially biased and does not adequately reflect the views or usage of local residents, which compromises the value of decisions and proposals based on it. Suggest reviewing the propositions in the plan based on the surveys to ensure they equitably represent the opinions and needs of all park users, and encourage further research that includes survey material from all periods during the year to ensure local values are fairly represented.	2f	Opinion regarding the potential survey bias noted. Management decisions can only be based on the best available information that can be obtained at the time. In addition to the survey conducted by Polley (2002), information obtained from Departmental visitor surveys and statistics which are collected throughout the year was also considered in the preparation of the draft. The public submissions process has provided further opportunity for park users, both local and non-local, to convey their views on the plan's proposals. The plan could be amended in the future if changes were considered necessary in the light of significant new knowledge. (e.g. in response to some relevant social research projects that are currently in progress or proposed to be commenced in the near future through Murdoch and Curtin Universities).
188	Concur with Part E of the plan	2a	Support noted.
189	The modest changes suggested by the Draft Plan for the Cape Range Park's roads, trails, day use, camping sites and other facilities may be overwhelmed by the popularity and population growth of the region (e.g. it underestimates the 'tourist tsunami' including cruise ships with several hundred visitors at one time, impacts of visitor numbers associated with the 100 bed Hilton Hotel at Coral Bay and the Exmouth Marina developments). The impacts of large numbers of additional tourists and their vehicles should be addressed strategically and in detail in the final plan.	2e	Whilst the plan acknowledges sustained growth in recreation and tourism demand and provides for increased opportunities, it also recognises environmental and social limits and that any increases in visitor capacity must be carefully managed to ensure the park's values are protected. A range of measures have been incorporated to achieve this (e.g. staged implementation of capacity increasing developments, monitoring and assessment of visitation related impacts, access restrictions; the use of visitor management settings site size definitions to protect maintain natural/remote areas). Ever increasing visitor numbers could not be accommodated in the park without adversely impacting on the park's ecosystems and the quality of the recreation experiences available - limits such as those which were proposed for Turquoise Bay are necessary to ensure these values are protected.
190	Does the park management know when or where cruise ships will appear in Exmouth and is a ranger there to greet them?	2b	This does not currently occur. Suggestion noted.
191	There should be additional DEC staff with enforcement capabilities during the holiday season, particularly with visitor numbers expected to increase.	2h	The suggestion has been noted. The plan is not amended however as the comment refers to a level of detail regarding resourcing which is not appropriate for inclusion in a management plan with a 10 + timeframe.
192	In terms of the proposed management of the park over the next ten years, the draft management plan, for the most part, considers the management requirements given the projected increase in visitor numbers to the park as the popularity of nature-based tourism continues	2a	Support noted.

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
	to grow.		
Recreation (Activities)			
Abseiling and Rock Climbing			
193	The plan states that commercial operators and not for profit groups must be registered under the National Outdoor Leader Registration Scheme or hold equivalent accreditation - It is their qualifications that must be recognised by the NOLRS and there is no equivalent to the NOLRS	1e	Plan amended.
194	The certificates mentioned in the draft are examples of accreditation that would be recognised by NOLRS. However the acceptability of the certificate from the Professional Association of Climbing Instructors is in doubt and may be withdrawn - this should be revisited prior to finalisation of the plan.	1e	Plan amended.
195	Abseiling and Rock Climbing should treated as separate activities both in the plan and in Policy Statement No. 18, in order to distinguish between the activities and better serve the needs of their respective participants, and enhance the clarity of the management plan.	2e	These activities are amalgamated to avoid the repetition as very similar key points, objective and strategies would be needed.
196	Section 28 of the draft management plan demonstrates a lack of understanding about the nature of rock climbing and how skills are taught and learnt. Hence the submission recommends that the wording of Section 28 (p83) is amended to state (or state something similar to) "All commercial operators and not-for-profit groups conducting rock climbing and abseiling with dependent participants and its members must also be registered under the National Outdoor Leader Registration Scheme (NOLRS) or hold current equivalent accreditation. However, some not-for-profit groups such as military and emergency services training groups or specialist rock climbing and abseiling clubs/groups such as CAWA operate under their own training guidelines and competencies and therefore do not require NOLRS or equivalent level accreditation. The Abseiling Instructors Certificate and Professional Association of Climbing Instructors schemes are currently regarded as equivalent to NOLRS".	1b	The plan is amended to reflect differences in current accreditation requirements for groups without dependent participants.
197	To require rock climbers to obtain approval for climbing is inequitable and almost impractical (due to the spontaneous nature of rock climbing as a result of its weather dependency). Approval is not required for bush walking, rock fishing, swimming, snorkeling or other activities (each with their own inherent risks) that are valid recreational pursuits on CALM-managed lands. Hence the submitter recommends that the	1c	The Department is no longer proposing to amend the Conservation and Land Management Regulations 2002 to require lawful authority for rock-climbing.

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
	reference to CALM regulation 33 being amended to require rock climbers to obtain a permit be deleted from the management plan.		
198	It is recommended that CALM consults with CAWA prior to deciding to restrict rock climbing in the Park.	2b	Consultation will be provided via the Department's Recreation Activities Coordinator and the Exmouth District Office as the plan is implemented.
199	CAWA supports promotion of its code of ethics.	2a	Noted.
200	Pages 83-84: The Department of Sport and Recreation encourages the expansion of abseiling and rock climbing activities.	2b	Noted. The plan allows for abseiling and rock-climbing use within the park on the proviso that a safe and high quality recreation experience can be provided and that adverse impacts can be adequately managed.
201	Abseiling and rock climbing activities at Pilgonamun Gorge is not supported due to the negative impact on threatened black-footed wallabies. (More detailed reasons outlined in submission).	1a	A review of abseiling and rock climbing will be implemented under this plan and will include assessment of sites against criteria based on conservation of the park's key values (including the threatened black-flanked rock wallaby) and visitor safety. This process will investigate alternative areas and/or management options that could be used to allow the activity to continue in the park without significantly impacting on threatened species or other key values of the park. In the meantime, Pilgonomun and Mandu Mandu Gorges will be closed for rock climbing and abseiling
202	The development of abseiling or rock climbing activities at Mandu Mandu Gorge is not supported unless there is thorough and periodic assessment of rock-wallaby habitat, distribution and abundance in order to appropriately locate these activities to minimise their impact on the threatened species.	1a	See above
203	Support for the inclusion of abseiling and rock climbing activities in the CRNP provided that: (1) The potential site is assessed as being unsuitable habitat for black-footed rock-wallabies; (2) There is no potential for visitor activities associated with abseiling/rock climbing to negatively impact on rock-wallabies or their habitat.		See above.
Camping			
	Support for screening and separation of day use and camping sites.	2a	Support noted.
204	This plan's proposal for continued closure of small coastal campsites exposes the Department's complete disregard for the community's disregard for such initiatives.	2b	The plan was released for public comment so that interested persons could comment on its proposals. Only 4 of 51 submitters commented on closure of coastal campsites. Three of these submitters objected to the proposed closure of Pilgramunna to camping. DEC and the Conservation Commission has reviewed the proposal for this site and it will now remain open to camping. There is increased provision for coast/near coast camping, including small camping areas under this management plan.

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
205	<p>Between the 1980's and early 2000s, numerous campsites and day use sites were closed to all access, and some closed to camping and designated day use areas, without community consultation. Through all of that period numerous and varied visitor surveys repeatedly quoted that park visitors primary attractions to the Park were (a) small scale undeveloped campsites close to the beach that did not create a crowded caravan park circumstance (b) access to the beach and natural assets of Ningaloo Reef (c) recreational fishing and (d) isolation. All of these closures were contrary to wishes of visitors and the prescriptions in the original management plan. Now this draft proposes further closing or reducing capacity in the 5 most popular coastal campsites and closing 2 others to vehicle access. The supposed compensation for this is the proposal to build 4 new inland campsites which will appeal to a small 'niche' market. Even those predisposed to an inland camping experience will probably still access the beach so there is no net gain to relieving pressure from the beach sites.</p>	2e	<p>The draft plan, along with the management plan for the Ningaloo Marine Park, includes provisions that would maintain all the attractions the submitter has referred to. In addition, the plan adds to the diversity of recreation opportunities available in the park by also considering the requirements of visitors who may also like opportunities to camp in inland areas or in larger groups (as indicated by some submitters to the plan). Recreation management within the park must adapt in response to increasing numbers of visitors, visitor pressures, and changing social circumstances. The plan's provision of some 'no vehicle access' sites, acknowledges attractions (a) and (d) as identified by the submitter. Varanus, an existing day use site will now allow for camping where it previously has not. The existing configuration of coastal recreation sites does not adequately cater for increasing day use (Turquoise Bay being the only major site dedicated for day-use), and the reassignment of some existing sites for the purposes of day use is preferable to further development of the coastline. It is acknowledged that visitors camping inland will also still access the beach (e.g. through the day use and boat launching sites), and strategies are included throughout the plan where relevant to protect the natural and other values of coastal areas.</p>
206	<p>The proposal to double the current number of campsites to between 200 and 220 is strongly opposed. This number seems to lack credibility and scientific support. How has CALM ascertained this as the carrying capacity that CRNP can support? Has it conducted environmental assessments of the entire park to reach this figure and to ensure that representative ecosystems will not be impacted? Doubling the amount of visitor use could potentially have irreversible and detrimental environmental implications for the arid region's finely balanced ecosystems. Increasing the overall number of camping sites should not be implemented until satisfactory assessments have been undertaken to plausibly establish the <u>sustainable</u> number of campsites the park can support.</p>	2c, 2e	<p>The plan includes a range of measures to ensure the park's natural values are protected while accommodating gradual increases in the capacity so that a greater number of people can enjoy recreation and tourism activities with the park. Strategy 1 on page 99 for example, refers to staged implementation of camp site developments and makes these subject to further detailed assessment for (and effective mitigation of) adverse impacts and, importantly, subject to key performance indicators for natural and social conditions being adequately met. The plan also provides for the development of more robust sites and distribution of visitors to reduce visitation pressures (e.g. on coastal ecosystems). Improved communication, for example ensuring that visitors are well informed about access and appropriate activities in the park as required under Strategy 2 on page 116 of the draft, is another essential element of managing for visitor impacts on the park's values.</p>
207	<p>A more conservative number of additional camping sites should be provided initially (e.g. 20-30) while appropriate assessments and impact monitoring are conducted. Day use should be encouraged in</p>	2e	<p>The term of the plan is 10 years or longer, and while it provides for the potential development of up to 200-220 campsites over the life of the plan, implementation of these would be staged and also subject to</p>

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
	preference to large increases in the number of campsites. Without the increase, more visitors would stay in Exmouth, supporting local businesses and operators.		further detailed assessment of potential environmental impacts and successful outcomes from performance assessment (see Page 99 of draft). The primary aim in providing for camping in the park is to maintain and enhance opportunities for the recreation experience of camping in 'remote, natural' environs, rather than a focus of providing accommodation and associated visitor services.
208	Support for the restricted use of generators as documented in this plan.	2a	Support noted.
209	It would appear that less and less campers are using generators.	2b	Noise pollution from generators is an issue in the park and therefore the plan places restrictions on their use.
210	Those camp sites where generators are allowed should be in a separate area to those without.	1e	Plan amended.
211	Generators are already restricted in the park to designated areas with a curfew on the hours of use.	2c	The plan proposes that restrictions on the use of generators continues over the life of the plan.
212	The management plan talks of intentions to "develop greater visitor opportunities away from the coast". However no details of this are given. The unanswered questions are legion: What areas? How accessed? What services? What restrictions? What considerations for commercial operators? Any detail would be better than an empty statement or is it that CALM has no intention of developing the Range, preferring to leave it undeveloped so as to fall into the 20 000 ha required to be declared a Wilderness Area?	2c	The areas now proposed for inland camping are indicated in Table 6. Much of the detail the submitter requests is not generally appropriate within long-term strategic level management plans - this site level design and management detail is developed in subsidiary planning documents. In response to submissions on the draft management plan, the creation of a wilderness area will not be pursued over the life of this plan.
213	The one existing inland camp site at Bungarra is not popular and only utilised when the rest of the camp sites are full. Visitors prefer to camp close to the beaches. This needs to be a main consideration when planning new sites.	2e	All existing campsites in the park are on the coast. There is limited scope for further significant developments along the coast without impacting on coastal landforms at high risk of degradation or compromising the area's remote natural values. It is desirable that a range of recreation opportunities is provided in the park.
214	Disagree that inland camping areas are a good idea as the main attraction for visitors to the park is to be able to camp near the beach.	2e	See above.
215	The inland sites are suggested at locations where the cumulative impacts of overnight visitors poses greatest risks to the park's environment, including the listed stygofauna in the coastal anchialine system and rare flora.	2e	The proposed inland campsites would not necessarily pose greater risks to stygofauna than sites located in other areas. Site development environmental impacts may be less in inland areas (e.g. the freshwater layer of the aquifer is much thinner near the coast than it is further inland, and, inland areas of the coastal plain have a higher substrate capacity than the Holocene Dunes). Strategy 1 on page 99 requires that the development of all campsites be subject to detailed assessment for and mitigation of potential adverse impacts on natural and other values.
216	I must question why " <i>a long distance kayak/canoe trail will require the provision of dedicated camping facilities</i> ". I should think that a	2e	Whilst it is not <i>essential</i> to provide dedicated camping facilities for this activity, there are a number of reasons that this may be advantageous.

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
	kayak / canoe campers requirements were much the same as others, a site to camp and park their conveyance.		(1) kayak/canoe access to some campsites can be difficult because of factors such as rocky access and beach slope (2) users of the trail should be able to access suitable campsites at appropriately dispersed distances along the coast (2) there is a need to reduce the potential for conflict with other recreational uses where possible (e.g. when getting kayaks to and from the water) (3) the nature of the activity (i.e. non-motorised means of access) is complemented and enhanced by a 'low-key or remote' camping experience where vehicles and motorised boats are excluded. To this end, the plan has provided for some walk-in/kayak-in only camping sites. The implementation of a booking system would be essential to effectively manage the long-distance kayak/canoe trail.
217	Recommend that kayak-only campsites be positioned every 10-15km along the coast as this allows time for snorkelling and enjoying the surroundings (Yardie Creek, Osprey-Bungarra, South Mandu, Varanus and or T-bone recommended).	2d	Noted. The information will be further considered if/as required during more detailed subsidiary recreation planning for a sea kayak trail.
218	The choice of suitable campsites for kayakers does not necessarily have to be judged on all the criteria listed, as experienced kayakers are capable of landing their craft in varying coastal landscapes and conditions.	2d	See above.
219	Agreed that the use of kayak/walk in only sites should not be made accessible by powered boats.	2a	Noted.
220	P98. With regard to coastal camping opportunities, paddlers who are moving along the coast and camping at different places each night need : rock free landing places, enough landing space to fit up to 10 canoes/kayaks side by side, enough space to haul the kayaks up the beach well clear of the high tide and fairly gentle slopes up the beach. We <u>don't</u> need sheltered landing places as experienced sea kayakers should be able to land in reasonable rough sea.	2d	Noted. The information will be further considered if/as required during more detailed subsidiary recreation planning for a sea kayak trail.
221	Support for booking system as described on P98, but small club groups must not have to compete with commercial or large school groups for the same paddling turf.	2e	Provision for separate facilities for kayak/canoe sites is not feasible given requirements for other coastal recreational uses and the importance of retaining undeveloped coastal areas.
222	Non-commercial, educational and not-for-profit activities: Small paddling groups should be kept separate from these and from commercial paddling safaris. School groups are over-powering and invasive to those wanting a quiet nature based experience.	2e	See above.
223	Support for the development of a major camping node and focal point at Kori Bay to centralise a certain amount of visitor activity to the	2a	Support noted.

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
	vicinity of Milyering Visitor Centre. Development of group camping sites is also supported.		
224	Support the introduction of a maximum length of stay of 7 nights during the school holidays.	2a	Support noted.
	Support for the introduction of reduced length of stays (p99).	2a	Support noted.
225	Support for limiting the length of overnight stays throughout the peak holiday season. Consideration should be given to grading the number of nights visitors can stay according to demand e.g. a maximum stay of 5 nights during school holidays, 12 nights during peak tourism months and up to 28 days during summer months.	2e	The limits proposed in the plan are thought to be sufficient address of the current level of competition for camp sites. Further changes (e.g. tighter restrictions such as those suggested by the submitter) may be considered necessary in the future -the plan provides for these limits to be reviewed by the Conservation Commission if necessary over the life of the plan.
226	Introducing a maximum length of stay of 7 or even 14 days would severely disadvantage West Australians - particularly those living in the south of the state (e.g. Esperance).	2e	Limiting length of stay during school holidays and peak periods will spread the opportunity to stay in the park over a greater number of visitors and therefore improve equity of access. Limits on length of stay, coupled with a booking system are necessary to ease the problem of high competition for camping sites during school holidays and peak periods. Addressing this issue of competition for limited sites will become particularly important if demand continues to increase as anticipated. Administration of a system that allows for altered lengths of stay (e.g. to accommodate visitors that have travelled long distances by car specifically to get to the park) is unfortunately not practical or feasible.
227	Disagree that campers mostly stay for 2-5 nights. People often initially book in for a few days, but continue to extend and end up staying considerably longer.	2g	This figure was obtained from visitors responses to a visitor survey undertaken some years ago, and is reasonably consistent with more recent preliminary research figures. University research projects currently in progress will continue to improve understanding of visitation in the area.
228	We would be very disappointed if Pilgramunna should become a day use area. It should be left as it is (i.e. available for camping), as day trippers and campers all enjoy the area without conflict. Locals in particular seem to favour Pilgramunna, particularly in the off-season. Request that it is left as it is, or should it become day use only, request that it be opened up again for camping in the off season months (from Nov-April for example)?	1b	The plan has been amended to allow camping to continue at Pilgramunna.
229	Eliminating Pilgramunna as a camping site is not supported for the following reasons: (1) This location is favoured by many local users and provides opportunities for snorkelling, swimming and fishing within the one area; (2) It is very suitable for families with young	1b	The plan has been amended to allow camping to continue at Pilgramunna.

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
	children; (3) Personal experience camping at this site during spring tides shows that although the tide reaches to the gravel road, it is shallow water and does not impinge on the camping areas, thus not threatening visitor safety. Suggest: (1) Maintaining Pilgramunna as a minor camping site; (2) Advising campers of Spring tide dates and times.		
230	Pilgramunna should not be closed to camping, but if it is, another (less desirable option) that should be considered is to maintain Pilgramunna as an active campsite during the quiet season (Oct-March). This is the main time when locals use the area and with fewer people at the site there will be less conflict between day use visitors and campers.	1b	Noted. The plan has been amended to allow camping to continue at Pilgramunna.
231	Strongly object to Pilgramunna having its camp status changed (from camping to day use). Like others, we come north to fish and would certainly change our fishing territory if CALM wanted to "park us up a hill".	1b	The plan has been amended to allow camping to continue at Pilgramunna.
232	There are other suitable sites which could be developed (for camping) with minimal impact such as Sandy Bay and the old Ranger station.	2e	Sandy Bay provides one of the best option for an alternative (beach/swimming) day use site to Turquoise Bay and its development as such is important to managing visitation pressures at Turquoise Bay, particularly during peak periods. Separation of camping and day use is preferred to minimise potential conflict between user groups. The old Ranger station at Bungalup provides operational facilities for use of staff, volunteers and researchers working in the park.
233	Sandy Bay would make an ideal family camping area.	2e	See above.
234	I accept the value the Dept has found in campground hosts and personally found most to be wonderful people, but question their overuse and some of the associated problems. Their extensive use had resulted in limiting contact between Dept officers and the public. The camp hosts effectively occupy up to about 10% of available campsites for about 6 months of maximum demand season (the fees from those sites should cover an FTE position). They do favour a number of friends and family with preferential booking of sites on occasion. Their presence is felt an intrusion on the camping experience giving a 'big brother' atmosphere.	2c	Opinion noted.
Caving			
235	Strategy 1, which proposes managing all caves in the park as restricted access until assessment and classification has been undertaken, could cause interruption to commercial caving operations being currently, quite legitimately, undertaken in the park. It will be necessary to	2b	Noted. This will be undertaken by the Department as part of implementing the plan. It may be that the Department grants commercial caving operations special permission subject to additional strict conditions (e.g. to address safety, environmental, cultural issues)

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
	communicate to these operators the reasons and expected timeframes for restricting access.		until the review has been completed.
236	P 87. It is important for CALM to consider some 'on site' management particularly in relation to the cave visitation and visitor impact monitoring.	2c	The plan provides for this.
237	Caves are sites of special significance to Aboriginal people as well as being particularly important to the wider community, and need to be included as a criteria in the assessment of public use of caves.	2c	The plan states that access to caves within the park must consider potential impacts on cultural values and involve consultation with the Coral Coast Parks Council (or equivalent traditional custodian representative group).
238	P 86. Table 6 Cave Classification System. Is it standard practice to charge a park entrance fee as well as additional fees to access certain areas within the park (e.g. caves)?	2b	Additional fees may be charged in situations where activities are associated with extra services/facilities or management requirements.
239	P85, last paragraph. Outlines that an assessment will be made of each cave's 'values, potential impacts and visitor safety issues'. This section refers to this assessment being undertaken in consultation with karst management and other specialists as necessary. It is important that CALM include speleological expertise that is broader than the NWCKMAC. In particular we would recommend that the ASF and its state-based corporate member groups are consulted. ASF has a number of members with knowledge, experience and skills and this experience can be utilised in CALM planning.	2d	Noted. The Pilbara Region and Exmouth District Offices will consider this and other specific consultation considerations during the plan's implementation.
240	P85, Para 3. The statements regarding vertical caves and horizontal caves with vertical entrances is confusing. Speleologists make clear distinctions between horizontal and vertical caves. If a cave has a vertical entrance or a section within it that is vertical then those who visit the cave will require the appropriate roping skills. It is important that readers are aware that, although most caves in the national park are wholly 'vertical', even if a system is mostly horizontal, if it has a vertical entry then the cave itself would be classified as a 'vertical cave', thus requiring specialist equipment and training to enter and exit safely over and above that required of a wholly horizontal cave.	1e	Minor amendments made to plan to avoid creating confusion on this point.
Cycling			
241	There should be provision for the development of a mountain bike track(s) in the plan to provide an additional land-based recreational opportunity, provided that: (1) Appropriate environmental and risk management assessment is conducted; (2) Stakeholders are consulted.	1b	The plan has been amended to provide for the possibility of a mountain bike trail to be developed over the life of the plan should sufficient demand arise and resources permit.
242	Consideration should be given to use of mountain bikes in the Cape Range National Park. Facilities for mountain bikes could be	1b	The few existing tracks (including the Sandy Bay track) within the park would not be suitable for mountain bike access due to incompatibility

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
	implemented in stages, with a review at each stage (e.g. of use, benefits and environmental impacts). Stage 1 could be the indication on maps of existing tracks and trails where mountain bikes may be used, with consideration then being given to creating further tracks and trails for mountain bikers (Stage 2). Stage 3 - consideration of an advanced mountain bike trail onto the top of Cape Range, and/or crossing between the east and west sides of the Cape, using existing 4WD tracks to prevent environmental disturbance.		with existing uses. Mountain biking could be an appropriate use within the park provided that environmental impacts and potential conflicts with other recreational uses can be adequately managed. The plan has been amended to allow this activity to be potentially accommodated over the life of the plan should sufficient demand arise and resources permit.
Day Use			
243	Oppose redevelopment of Lakeside into a major day use site. This site supports a delicate and relatively pristine coral reef system which would quickly be impacted by increased visitation. Instead, Lakeside should be promoted as a medium or (preferably) minor day-use site targeting visitors choosing to snorkel; the impact of snorkelling should be monitored over time; educational information should be provided to visitors on minimal impact snorkelling; and visitors not seeking snorkelling sites should be redirected to alternative sites such as Sandy Bay.	2c	Snorkelling is a very popular activity with visitors to the area, and Lakeside is one of the few sites in the park which can be accessed from the shore, as is therefore an alternative to snorkelling at Turquoise Bay. Anecdotal reports by staff indicate that increasing numbers of visitors are already undertaking snorkelling at Lakeside. The management plan for Ningaloo marine park includes strategies to monitor the impacts of recreational use on the reserve and to develop Codes of Conduct and education programs to minimise environmental impacts of marine based recreational activities. Further detailed recreation planning is required, however the Lakeside site is likely to be developed as a separated two nodal sites so that access to launch boats can be well separated from snorkelling access and use. This issue, as well as others associated with potential coastal landform degradation and storm surge will require special consideration during detailed site level recreation planning. Any larger more significant recreation infrastructure development will be cognisant of adequate coastal setback distances.
244	Disagree that Sandy Bay could provide an alternative day use site to Turquoise Bay as it is too far away from the park entrance and Visitor Centre.	2e	DEC considers that there are no feasible alternatives to Turquoise Bay's sandy sheltered beach and suitable swimming area nearer to the park entrance and Visitor Centre. Sandy Bay is within a 30 minutes drive from the park entrance, and therefore not an unreasonable distance for those spending a day within the park. Management response to the capacity issues at Turquoise Bay is important. The submission has not suggested other alternatives for DEC to consider.
245	Despite the increase in size of the Turquoise Bay car park, the car park is still full! Visitor numbers need to be restricted at some day use sites and this needs to be stipulated in the plan (e.g. what is the capacity of Turquoise Bay?).	2c	The plan states that the capacity of Turquoise Bay will remain fixed at current levels for the life of the plan. Capping the car park of Turquoise Bay will not in itself be effective in regulating visitor numbers at the site as groups of visitors on commercial tours can be dropped off and then picked up at a later time. DEC visitor survey responses suggest that the current levels of visitation at Turquoise Bay

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
			are not detracting from visitor's experience of the park.
246	It may be short-sighted not to increase the capacity of Turquoise Bay and not to allow trailers and vans access as anyone towing a caravan has driven hundreds if not thousands of kilometres to visit the parks and would probably disregard the notice or park on the roadside.	2e	See discussion for Comments 243, 244 and 245
247	We believe that CALM's approach to managing Turquoise Bay may be a 'head in the sand approach'. People will continue to 'bush park' (mostly 4WDs who can get out again) rather than travel the extra 15kms to Sandy Bay. Perhaps hefty fines will have to be used to deter such behaviour?	2b	The issuing of infringement notices is an option that the Department can employ to address illegally parked vehicles. See discussion for Comments 244 and 245 as well.
248	Support reducing the pressure of visitor usage at Turquoise Bay. However there remains concern that directing visitors to Lakeside will negatively impact the marine system there, which currently is relatively undamaged. Suggest promoting Sandy Bay, Kori Bay and other swimming beaches without sensitive coral habitats, as many visitors don't come to snorkel, but rather to swim and recreate.	2c	The plan (page 82) refers to visitors being directed to Sandy and Kori Bay as swimming alternatives, but to Lakeside as an alternative for snorkelling. The relevant strategy has been amended to be clearer on this point. Snorkelling is a key attraction for visitors to the area and conservation of near shore coral communities is not only important to protect their ecological values, but also their visual quality. Damage to coral habitats can be minimised by ensuring that visitors are provided with information on low impact snorkelling. Monitoring programs can be established for ongoing assessment of impacts.
249	Tourism WA believe that the current car park at Turquoise Bay is too small given the size of the snorkel site and the ability to spread people out across the bay.	2e	Capping the capacity of Turquoise Bay at current levels is (along with visitor information/education) is important to assist with maintaining the quality of the visitor's recreation experience (e.g. protect the visual qualities of the coral communities, and avoid overcrowding the drift snorkel site)
250	p82. Tourism WA supports the Department's direction in trying to shift the focus off the Turquoise Bay site. We believe that if the capping of numbers at sites is to be successful, a stronger strategy is needed. Simply capping visitors by only allowing parking in existing bays will not only <u>not</u> solve the problem, but will significantly increase visitor risk as people will park along the main Yardie Creek Road.	2c	Maintaining the current parking capacity of Turquoise Bay is one of a suite of management measures to assist with pressures at this site. Other strategies such as increasing visitor education/information provisions, enforcing parking restrictions and developing alternative day use options will further assist with managing the issues at Turquoise Bay.
251	p82. Tourism WA supports the Department's direction in trying to shift the focus off the Turquoise Bay site by creating similar experiences in other areas thereby better dispersing visitors.	2a	Support noted.
252	Page 82: Capping the capacity of Turquoise Bay will only work if there is adequate manpower to enforce the control. Implementation of any such policy should be accompanied by a display at the Exmouth Visitor Centre, where staff might also assist with the education of park users.	2b	The Department notes the suggestion regarding information at the Exmouth Visitor Centre, and will consider this as part of implementing the plan. Increasing staff presence at the site during peak periods can assist with increased compliance. Infringement notices can be issued if necessary if vehicles continue to be illegally parked.

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
253	Tourism WA would only support capping the capacity of Turquoise Bay if the size of the car park was increased considerably with the addition of designated coach parking, and there was more signage and information indicating alternatives.	2c	Capping the capacity of Turquoise Bay at current levels is (along with visitor information/education) is important to assist with maintaining the quality of the visitor's recreation experience (e.g. protect the visual qualities of the coral communities, and avoid overcrowding the drift snorkel site). The plan states that visitors will be directed to alternative sites that can otherwise meet their requirements.
254	Page 81: Support for use of safety signage and warnings of rips etc for snorkelling at Ningaloo Reef, as well as for provision of buoys as directional markers and additional warning measures when the current is particularly strong.	2a	Support noted.
255	Given the high number (within the last ten years) of drowning and near drowning within CRNP (particularly Turquoise Bay), it is strongly recommended that the plan clearly demonstrate the Department's commitment to facilitating the safety of park visitors. It is recommended that point 6 on page 83 be amended to read "in consultation with the Marine Parks and Reserves Authority, implementing further safety measures at Turquoise Bay." To this end, the following recommendations are made: (1) erect a buoy to delineate the area that is safe for swimming. This method is trans-cultural, readily visible from the beach and less costly than providing a life saver; (2) explore other options for risk management such as rescue boat access; and (3) implement a communication system for emergency response at high risk areas (e.g. public phone at Turquoise Bay).	1e	Amendments made to plan. Suggestions for improving safety noted.
256	Warning signs alone will be insufficient in addressing safety issues at Turquoise Bay. Turquoise Bay requires the services of a lifeguard in peak periods, and an emergency telephone should be installed there to help deal with safety issues.	1d	An emergency phone is being installed.
Walking			
257	p74-75. Support for the creation of new and the improvement of existing walk trails within the park, including the provision of water points for long distance walkers.	2a	Support for walk trail proposal noted. Walkers will generally be required to be self sufficient with regards to providing their water, however installation of water points may be considered in the context of more specific trail development plans
258	Support for visitor services provided (e.g. toilets and water) at Milyering but suggests provision of water at southern end of the park nearer Yardie Creek for day visitors and campers.	2e	see above.
259	A rainwater tank should be installed on the "Across the Range" walk trail.	2e	See above.
260	Support for maintaining and increasing walk trails as indicated in the	2c	The draft plan included provisions to address points. Some of these

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
	plan provided that: (1) Appropriate environmental and risk management assessment is conducted; (2) Stakeholders have an opportunity for input; (3) The potential site is assessed as being unsuitable habitat for black-footed rock-wallabies; (4) There is no potential for visitor activities associated with abseiling/rock climbing to negatively impact rock-wallabies or their habitat.		provisions have been strengthened in the final plan.
261	Walk trails proposals in the plan are supported, particularly the new trails such as the "Across the Range". Use of this proposed trail should be restricted to cooler seasons for safety reasons.	1e	Support noted. Agreed that the use of walk trails in summer presents a greater visitor safety risk and that closure of the trail during very hot weather may be the most feasible way to manage this risk. The plan will be amended to specifically refer to this management option.
262	The walk between Thomas Carter Lookout and Shothole Canyon Road is important for climbers to be able to access the area. The walk between the terminus of Shothole Canyon Road and Thomas Carter Lookout should be re-opened to facilitate access by rock climbers and provide greater recreational opportunities at a wider range of sites within the park.	1e	As indicated in the draft this walk was closed because of visitor risk issues. The final plan has been amended to indicate that the walk may be reopened if these visitor risk issues can be adequately resolved.
263	A registration system for climbers and walkers, such as that in the Stirling Ranges NP or on the Bibbulmun track, would be appropriate. However one that is onerous or difficult should be avoided.	2c	Noted.
264	Pedestrian Access - a three or four day walk along the Cape Range ridge line would be fantastic. All rubbish and bodily wastes could be carried out and users could be responsible for carrying all their water.	2e	The walk trail proposals in the plan are to detailed assessment and effective mitigation of environmental impacts (e.g. disturbance to colonies of black-flanked rock wallabies—see <i>Mammals</i> in Section 17). Alternative walk trails may need to be identified as a consequence and this suggestion could be considered in this instance. Recreational opportunities in the broader region will be considered in developing walk trails in the planning area – trails that link to or complement other trails would generally be preferable to circuits within the park.
Water Based Activities			
265	Windsurfing and kite surfing: the Department of Sport and Recreation supports the notion of "safety zones" and would seek to develop strategies with CALM and Tourism WA to encourage state, national or international events.	2b	The suitability of such events within the park needs to be considered in the context of a specific proposal. The <i>Special Events</i> section of the management plan provides for consideration of proposals on a case-by-case basis.
266	Local residents have noticed a significant increase in the use of jet skis (not included in the plan) and kite surfing, both of which have the potential to damage coral, injure swimmers and snorkellers and marine wildlife such as turtles and dugong. Sensitive areas (e.g. turtle feeding & mating areas, major snorkelling sites) should be designated as "jet ski and kite surfing free" zones (e.g. not within 500m of the shore at	2d	These activities occur in the marine park and will therefore be considered in the recreation master plan to be developed under the management plan for that reserve. That recreation masterplan will consider if/how these activities can be managed to prevent impacts on key ecological values (both marine and terrestrial) and to prevent conflict with the recreational uses proposed in this plan.

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
	Lakeside).		
267	Long Distance Kayak/Canoe Trail: Paddlers need some shelter from the prevailing winds at night, to prepare meals and sleep. Bibbulmun Track style shelters would do. They need to be within 100 metres of the beach and no more than 15km apart. Water, rubbish disposal areas and toilet facilities would definitely be required. CALM could invite the various paddling, outdoor and sea kayaking organisations to provide labour for their construction.	2b, 2d	The intended recreation experience associated with such trails is at the more natural or remote end of the recreation opportunity spectrum, and accordingly the development of any new associated camping areas would need to be consistent with this type of experience. Any walk-in/kayak-in only sites additional to those identified in Table 6 and Map 8 will be of a small scale, subject to assessment against environmental and other criteria and consultation with the Conservation Commission and key stakeholder groups.
268	A fully laden sea kayak can weigh up to 90kg. Please try and keep car parks reasonably close to the water, say no more than 100 metres to allow loading by the water of unladen kayaks.	2d	Information noted. There are a wide array of factors (e.g. storm surges, shoreline accretion/erosion, land capability) must be considered in the identification of appropriate setback distances for coastal developments.
269	You should plan for experienced paddlers on long treks and novice paddlers on individual beaches.	2d	The information will be further considered if/as required during more detailed subsidiary recreation planning for a sea kayak trail.
270	Why does the permit system for non-powered boating use at Yardie Creek not apply equitably to both commercial and non-commercial visitors?	2g	The plan states that a permit system is to be introduced for kayaking in Yardie Creek with limits of 5 kayaks at a time - it does not stipulate whether visitors are on a commercial tour or independent visitors.
271	P 74: It would be a great loss of a wonderful experience not to be able to paddle in the Yardie Creek Gorge. I hope that a permit system and education program can safeguard the gorge and its native animals and birds.	2b	Concern noted.
272	Strategy 12 on page 77 should be amended to read "consider introducing....." and the rest of the strategy should be deleted.	2e	Restrictions on kayak/canoe access are necessary to assist with the protection of black-flanked rock wallabies (a threatened species) and nesting birds. The gorge is quite narrow in parts and by restricting access to up to 5 kayaks, it will be easier for kayakers to keep appropriate distances from the cliff faces used by rock wallabies and roosting birds. Larger groups are also likely to create more noise which can disturb this fauna. The Conservation Commission have requested the consultation referred to in the strategy, and the strategy allows for review and amendment of the control system.
273	P74. There is a need to cater for individual visitors and groups as well as commercial operators and to this end we support a permit system that caters for kayak tours and tag along tours being allowed to operate in Yardie Creek. However, we believe that it would be dangerous to identify a specific capped number in the plan (e.g. pg77, Pt12) at this stage (unless there is a scientifically defensible number) as tourism development opportunities and interest in the park are so dynamic and	2e	The limits for kayaks in Yardie Creek is inclusive of both independent visitors and those associated with commercial tours alike. Limits are included in the plan to manage visitation impacts on threatened black-flanked rock wallabies and nesting birds. The cap is not fixed for the life of the plan and can and will be reviewed by the Department and Conservation Commission over the life of the plan.

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
	the management plan should reflect this.		
274	P74. Current licence conditions preclude most commercial tour operators from using Yardie Creek. Does the proposed introduction of a permit system to utilise the creek for kayaking mean that commercial operators have the option of utilising the creek presuming that they will assist managing visitors better?	2b	The limits for kayaks in Yardie Creek is inclusive of both independent visitors and those associated with commercial tours alike.
275	With regards to a permit system for kayaks in Yardie Creek, I would suggest a registration system using a book (like walk track registration) where people sign on and off as they go. Permits specifying times of access are impractical unless issued on-site, and CALM would be unable to provide staff at Yardie Creek 7 days a week to do this. A registration system is more appropriate and practical and favours people actually using the creek rather than those obtaining a permit which only reflects intent.	1d	It is acknowledged that there are a variety of systems and methods that could be implemented to manage access limits, and therefore the plan has been amended to refer to the implementation of such a system in more general terms. It is not intended to introduce an unreasonably onerous system. The amendment allows flexibility regarding the type of system that is used and acknowledges that management methods may need to change over the life of the plan.
276	The introduction of a permit system for kayaking in Yardie Creek might constitute over-regulation. If it is absolutely necessary, the maximum of five kayaks/canoes at a time seems limited.	2e	Restrictions on kayak/canoe access are considered necessary to protect black-flanked rock wallabies (a threatened species) and nesting birds. The gorge is quite narrow in parts and by restricting access to up to 5 kayaks, it will be easier for kayakers to keep appropriate distances from the cliff faces used by rock wallabies and roosting birds. Larger groups are also likely to create more noise which can disturb this fauna. The numbers of kayaks permitted in the creek will be reviewed by the Department and Conservation Commission, initially a year after the system is introduced.
277	Page 82: The Department of Sport and Recreation supports the expansion of other snorkelling sites, fishing areas etc.	2d	These issues are generally addressed in the management plan for Ningaloo Marine Park.
278	There are some lovely snorkelling sites a fair way off shore. Could you provide some moorings along the coast for <u>non</u> -powered craft to tie up for snorkelling? It would save anchor damage to the coral.	2d	Noted. However, these activities occur in the marine park and will therefore be considered in the recreation master plan to be developed under the marine plan, rather than the management plan for Cape Range National Park.
279	Swimming, snorkelling and Surfing: Existing and increasing coral damage at Oyster Stacks, where the reef is close to the surface during low tides, Turquoise Bay and Lakeside is of extreme concern. There should be: (1) Restrictions to exclude snorkelling at Oyster Stacks when the tide level is less than 0.5m above the reef, possibly including installation of a tide marker to indicate when snorkelling is not permitted; (2) appropriate management controls to protect sites from further coral damage; (3) increased education/interpretation about the impact of standing on coral, fin damage etc.; and (4) Promotion of	1a	Implementation of the measures suggested is provided for in the plan (e.g. Strategies 2 and 7 on page 83, Strategies 2 and 6 on page 116). However the plan has been amended to more specifically refer to the suggested measures.

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
	alternative sites with less significant marine systems for day use areas, such as Mesa, Sandy Bay and Kori Bay. (This issue is also identified in the Ningaloo Marine Park Management Plan, which states that appropriate control measures should be introduced).		
Wildlife Viewing			
280	P95. Wildlife Viewing. Tourism WA are pleased to see that additional wildlife viewing and guided tour opportunities (marine) are to be developed.	2b	Noted.
281	In relation to wildlife viewing, there should be little (if any) development of nocturnal activities to reduce road kill of native animals.	2c	The plan acknowledges that wildlife viewing can have adverse impacts if appropriate management is not in place - the plan also includes strategies regarding mitigating these impacts (e.g. see strategies for Section 17 <i>Native Animals and Habitats</i> . The objective for wildlife viewing is to provide opportunities for "sustainable wildlife viewing" and for <i>Wildlife Viewing</i> . If any guided turtle watching activity is to be undertaken in the park, this is unlikely to lead to significant increases in vehicular traffic.
Other Recreation Issues			
Access (Roads)			
282	p72, Para 3. Provides a description of the roads and suggests that both Charles Knife and Shothole Canyon Roads are expensive to maintain. Does this mean that roads in areas to be added to the public conservation estate will be sealed by CALM after it takes over? Closed?	2b	Maintaining the Charles Knife and Shothole Canyon Roads is an important part of providing a range of recreation experiences. The Department would aim to maintain retain this access.
283	P100. Commercial opportunities at Milyering (e.g. café, booking tours) would be greatly assisted with the creation of the road over the range which would inevitably make the proposition more viable within the short period of this plan.	2c	See response below regarding a road over the range.
284	Tourism WA would like to see an extension of either the Shothole Canyon or Charles Knife Road across the range to Milyering as well as the provision of access along the existing Sandy Bay track when that is actionable. We would like to see both roads created as 4WD access initially with the Milyering option upgraded to 2WD as soon as funding permits.	2e	As stated on page 72 of the plan, options for a road over the range have been considered by the Department and Conservation Commission in the preparation of the draft. This position has been reconsidered by the Conservation Commission, the Department, the Coral Coast Parks Advisory Committee and the Coral Coast Park Council, with the conclusion being that only the Sandy Bay Track option as outlined in the plan is supported over the life of this plan.
285	Visitor Access. The Department's preferred option for providing access over the range along the existing Sandy Bay Track is obviously dependent on the excision process concerning the Exmouth Gulf	2f	The management plan proposals to provide access across the range via the Sandy Bay track are dependent on the Exmouth Gulf pastoral exclusion areas being added to the conservation estate and resolving

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
	Station pastoral lease. If no early surrender is negotiated, the earliest this could commence would be 2015. Tourism WA supports a more timely solution to this issue as the success of many commercial operations, as well as the desire of visitors not to backtrack, are largely dependent on the designation of a road over the range.		Department of Defence and limestone mining issues.
286	Tourism WA understands the financial enormity of a road across the range and again is aware of local stakeholder feedback and is happy to work with CALM on the resolution of these issues.	2e	This position regarding a road over the range has been reconsidered by the Conservation Commission, the Department, the Coral Coast Parks Advisory Committee and the Coral Coast Park Council, with the conclusion being that only the existing Sandy Bay Track option as outlined in the plan is supported over the life of this plan.
287	While we support the Department's intention to introduce a permit system for access to the road across the range, as long as there are demonstrable management reasons, Tourism WA would like to be closely involved in the introduction of any such system to use this road option, with particular regard to the conditions that would be imposed on commercial operators.	2b	Information on the level/patterns of use will be used to assist with evaluating visitation impacts and visitor experience and how these could be managed over the life of the plan. There have also been safety incidents with people venturing off the track, and information obtained from a permit/registration system would assist with recovery operations.
288	Regarding formalising use of the Sandy Bay Track (Page 72, Vehicle Access): an additional note could be added stating that this would involve resolving Department of Defence issues. Currently the track crosses RAAF Base Learmonth property and public access to the range immediately east has security implications.	1e	Plan amended.
289	The plan talks of opening the road from Sandy Bay across the range. Unfortunately this is an empty promise as they are not in a legal position to open the road as it passes through Exmouth Station, which CALM will not have control of until 2015.	2c	The draft plan clearly stated that traversing the Sandy Bay Track in its entirety is not currently possible (page 72), but may become possible over the life of the plan. The plan acknowledges an interim arrangement where there can be access to the top of the range from the western side under a permit/registration system.
290	The Sandy Bay track is currently used by recreational 4WD users as an off-road experience. I strongly disagree with a permit system. If you want to offer the track as a recreational activity (which I think you should) a permit system will not work as people use the track spontaneously and will not go into Exmouth or Milyering to get a permit for a recreational experience, and CALM will be viewed as unreasonably restricting use of the park. The condition of the track has not changed for 40 years and no valid reason has been given for a permit system and it just seems like over-regulation for no reason.	2e	The condition of the track may be susceptible to degradation if use increases considerably. The permit (or alternative access management) system is proposed to facilitate the collection of information (including for example level and patterns of usage) that will improve management of the track and visitor safety. The level of permitted access would be reviewed in consultation with the Conservation Commission initially one year after implementation and limits will only be used if considered necessary to provide a quality and environmentally sustainable recreation experience.
291	If one way direction is to be required (on the Sandy Bay track), the west-east route as suggested is the most appropriate, for ease of access (the correct track can be difficult to find from the Learmonth side) and	2a	A one way route is preferred over the long-term. This will not be possible in the short-term at least as proposed additions and other constraints, as mentioned in the plan need to be resolved.

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
	safety reasons (sun glare combined with dust can make the track very difficult to see).		
292	Sandy Bay Track from behind the airport across the ranges to the west coast should be open to recreational 4WD on a 'day trip only' basis.	2e	It is proposed to develop a small inland camping area in association with the Sandy Bay track.
293	Could a dry 4WD crossing over Yardie Creek be established somewhere up stream? Or the road over Cape Range, south of Exmouth still seems a good idea to me (to save people having to drive the long way round through Exmouth to get to Ningaloo Station, if Yardie Creek is flooded).	2f	The development of a 4WD crossing as suggested is not feasible. See discussion for Comment 286 regarding a road over Cape Range.
294	P76 & 77. The Ningaloo Sustainable Development Office supports maintaining the crossing at Yardie Creek in its current state and this is consistent with the Ningaloo Regional Strategy Carnarvon to Exmouth.	2a	Support noted.
295	Yardie Creek should never have an all weather/all vehicle crossing as the increase in traffic will detract from the experience and increase the risk to wildlife.	2a	Support for approach in the plan noted.
296	Most rock climbing activities occur in the vicinity of Thomas Carter Lookout and Shothole Canyon Road - both Charles Knife Road and Shothole Canyon Road are important access routes for rock climbers and should continue to be maintained as access roads to these areas.	2a	These roads provide important recreation access from the eastern side of the range and ongoing maintenance of these is supported in the plan provided safety standards can be adequately maintained.
297	Any change to speed zoning is subject to Main Roads review and approval.	1e	Plan amended to make direct reference to this.
Access (Boats)			
298	With regard to beach and boat access, submitter requests that provision be made in the plan for consultation between CALM and Exmouth Regional Recreation Fishing Advisory Committee before boat launching sites are designated as launching or non-launching sites throughout the life of the plan. This will allow for a transparent assessment of each location and safety and conflicting use issues.	1b	Noted.
299	Coastal camping and day use facilities situated within the national park must retain the opportunity to launch a boat over the beach in those locations where fishing is allowed in the adjacent marine park.	2c	The plan included reference to the need for over-the-beach boat launching to be consistent with marine park management strategies.
300	The original management plan prescribed " <i>Existing and potential beach launching sites suitable for various craft will be evaluated and where appropriate improvements will be made and ramps installed</i> ". Although I believe the number of suitable sites is limited, the Dept has been remiss in not addressing this prescription. That is, identifying and developing several formal low key launch sites at strategic spacings along the coast and alternate to those 'across the beach'.	2e	It is intended that boat launching areas within the park will not be hardened over the life of this plan as a formal boat ramp provided in Jurabi Coastal Park 3 km north of the national park boundary at Tantabiddi is expected to meet demand over this time. This ramp also caters for much larger vessels. A boat launching facility for large vessels is also to be constructed south of the Coral Bay settlement at Monck Head.

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
301	P 73. Beach and Boat Access. <i>"The location of a boat launching facility for large vessels at Coral Bay is being considered by the State Government"</i> The location of the boat launching facility has been determined. While the design has yet to be finalised, the facility is to be constructed south of the Coral Bay settlement at Monck Head.	1e	Noted
302	There are concerns regarding risk to visitors with the installation of moorings as proposed in the plan.	1e, 1a	The assumption underlying this proposal was that moorings would be in near shore protected area to help reduce conflicts between various uses of the beach, although it is acknowledged that this was not made adequately clear in the draft. The proposal has however been reviewed in the light of public submissions and as this is not currently a major issue, references to moorings at Yardie Creek has been removed. Site design measures may be employed to assist with beach access issues investigated if necessary.
303	Submitter would like to be involved in any discussion on boat moorings and/or access to surf spots.	2d	The proposal regarding moorings at Yardie Creek has been removed from the plan (see above). With regards to broader consultation on moorings, the Department's Policy Statement No 59 Mooring Policy states that the Department will consult with community user groups in the implementation of the mooring policy in order to assist with a smooth implementation process.
304	Visitors already pay to access the national park - does the installation of moorings mean that visitors will be paying twice to go surfing?	2d	See above.
305	Submitter has been told that seaward markers for sanctuary zones in the marine park have not been installed because of issues with visual pollution. Mooring buoys will create the same if not greater visual pollution than seaward sanctuary markers as they would all be confined in one area.	2g	See above. Also, the reasons for not installing seaward markers are more about issues surrounding installation and maintenance of mooring in deep water. The onus is placed on visitors to the marine park to be aware of their location (e.g. using GPS equipment).
306	The proposal for ocean moorings at Yardie Creek is impracticable due to the tidal influence and the rocky seafloor. Boat owners required to moor their boats instead of pulling them up on the sand will 'farm' the coral and rocks within the 'swing' area of each mooring. Thus, moorings will harm and destroy the coral and marine floor in a circle at each mooring. I am strongly opposed to moorings in the ocean at Yardie Creek and favour small boats being permitted to be left on the sand in a designated area.	1a, 1e	The proposal regarding moorings at Yardie Creek has been removed from the plan (see above).
307	Submissions expressing concerns regarding the consideration to install mooring buoys at certain locations in the marine park, specifically at Yardie Creek. These include concerns that use of moorings are not feasible because of changing conditions in a wave zone, disbelief that	1a, 1e	The proposal regarding moorings at Yardie Creek has been removed from the plan (see above).

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
	they would be adequately maintained, and dissatisfaction with the level of public involvement/consultation. The submissions state that the knowledge and experience of the stakeholders with regard to this matter is being disregarded by the Department.		
308	Submissions question who will be responsible for maintenance of proposed moorings and have concerns over the Department's capacity to adequately maintain moorings.	1a, 1e	The proposal regarding moorings at Yardie Creek has been removed from the plan (see above).
309	I have rowed my outboard powered boat up Yardie Creek on many occasions since 1960. Small rowable vessels with outboard motors removed should also be allowed on Yardie Creek.	2c	It is powered boats that are prohibited from the creek. Small non-powered vessels would be acceptable.
Booking System			
310	The present approach to managing camping without a booking system is fair and equitable. International and interstate visitors, especially, would be disadvantaged by the introduction of a booking system.	2e	The existence of a booking system would need to be well advertised so that visitors could plan ahead. The capacity to pre-book a campsite would provide international and interstate visitors with the advantage of knowing that they could get a campsite when they arrive. Booking systems for camping in National Parks is successfully implemented in many countries (e.g. Canada and the US) and elsewhere in Australia (Tasmania and QLD)
311	Disagree with the need for a booking system. It will cater for international visitors who plan their holidays on a time schedule, not for the average Australian travelling around.	2e	See above.
312	The pre-booking of campsites is a good tactic to manage people's expectations during peak season and school holidays.	2a	Support noted
313	P98 Tourism WA supports the view that the implementation of an efficient booking system for camping is essential to manage future camping demand in the park.	2a	Support noted.
314	The addition of more camping sites would further alleviate the need for a booking system.	2e	The plan provides for some staged increase in camping capacity subject to key performance indicators for natural and social conditions being adequately met. However the need for a booking system remains as demand for campsites will at times exceed supply (e.g. during peak periods).
Ecolodge/Safari Camp			
315	There should only be one ecolodge considered for the park - this limit should be stated in the management plan.	1e	Plan amended.
316	Ningaloo Sustainable Development Office support the stated intention that the "management plan will provide the framework for undertaking strategic consultation with the Ningaloo Sustainable Development Committee (NSDC) regarding new developments in the park" (page 6)	1e	Noted. Some amendments made to plan.

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
	and it is understood that development associated with operational management works consistent with the management plan would not require consultation with NSDC. However, other forms of development for non-management related purposes (e.g. tourism development by private individuals) would require consultation with and approval from the NSDC under the Ningaloo Coast Regional Interim Development Order.		
317	p96 Overnight Stays. An additional safari tent (semi-permanent site) and ecolodge site have been identified as needed but no specific site determined. Tourism WA would like to know why the Department is "not in a position to nominate potential ecolodge sites at this stage".	2e	A number of potential ecolodge sites were evaluated during the development of the draft, however these were assessed to be inappropriate primarily on the basis of visual landscape impacts. The assessment of further sites prior to the release of the draft was not feasible or warranted given the lack of a specific proposal. Identifying a potential ecolodge site in the absence of the context of a specific market proposal is problematic and an inefficient use of resources should a specific proposal not arise over the life of the plan.
318	P 96 Overnight Stays. The draft management plan currently states (p67) that the NCRS " <i>defers decision making for tourism and recreation development/use in Cape Range National Park to the management plan</i> ". This statement is inaccurate, the NCRS defers the specific location of the site to the management plan - nothing more. Tourism WA would like to see the final management plan more accurately reflecting the NCRS and containing positive assertions about the work CALM will undertake to finalise the location of the ecolodge site.	2f	The plan provides for development of an ecolodge within the park over the life of the plan subject to the guidelines, criteria and approvals as specified in the plan. There are difficulties in identifying a potential site for this type of development in the absence of the context of a specific market proposal. The final plan includes a number of criteria to provide ecolodge development proponents with a guide to suitable/unsuitable locations within the park. The Department will undertake further detailed assessments for ecolodge locations in response to specific ecolodge proposals for the park over the life of the plan.
319	p96 Overnight Stays. Tourism WA is aware of the concerns that may be raised by some local stakeholders that accommodation on the western side of Cape Range may negatively impact on their business. Tourism WA does not support this view and is quite happy to be quoted in this regard. An assumption that long term business viability within a town in close proximity to a national park will be enhanced by denying visitors acceptable facilities within that park and thus devaluing the overall natural experience being sought is, in Tourism WA's (opinion), fundamentally flawed, short term thinking.	2b	Noted.
320	Coastal Tourism Framework - the Cape Range National Park Ecolodge is not listed under Ecolodge Tourism Sites as designated in the <i>Ningaloo Coast Regional Strategy (NCRS) - Carnarvon to Exmouth</i> . P 81 of the Strategy clearly states: "Cape Range National Park Ecolodge -	1e	The relevant table has been amended to include the reference to an ecolodge within Cape Range National Park.

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
	A site at Mandu Mandu Gorge north has been identified within this framework. However, the final location of any ecolodge site within the national park... will be determined in the Cape Range National Park management planning process". The site in the northern portion of Cape Range was included to provide a variety of experience types in the ecolodge hierarchy.		
321	I am appalled at the suggestion of a safari camp at Kori Bay. The visual intrusion on the landscape could not be hidden. Reef Retreat struggled to hide itself amongst a large dune swale. The Milyering vista will be severely affected.	1b	The proposal regarding more safari tent accommodation has been re-evaluated through the public submissions process, and has now been removed from the management plan.
322	The draft plan expects the community to accept the 'blank cheque' CALM has written in for another commercial safari camp and ecolodge with sites yet undetermined, which seems to confirm an undeclared policy being applied to the Park to intentionally displace the traditional low key camper from the broad Western Australian community, and particularly the local Exmouth community, in favour of a resource demanding, elite, wealthy, international and metropolitan tourist fraternity. Such a policy is clearly inequitable and contrary to the fundamental principles of national parks. I must question which of the favoured campsites earmarked for closure CALM actually intends to locate these proposed commercial accommodation facilities adjacent to, while withholding that fact from the public? I must also ask does this represent the intention of CALM to pursue an undeclared policy of privatisation of national park assets?	2e	See comments above regarding the proposal for 'safari-tent accommodation'. The Western Australian Planning Commission's planning process resulting in the <i>Ningaloo Coast Strategy - Carnarvon to Exmouth</i> concluded that it would be appropriate to include an ecolodge node within Cape Range National Park. The "traditional low key camper from the broad Western Australian community" would not be displaced by an ecolodge as the plan provides for ongoing and increased provisions for camping as well. Suitable locations for an ecolodge style development would be considered over the life of the plan if specific commercial proponents arise. Any ecolodge approved for the park would not have exclusive access to beaches or other key features such as gorges. The policy regarding commercial concessions on lands and waters managed by the Department is described in its <i>Policy Statement 18 Recreation, Tourism and Visitor Services</i> .
323	I believe the concept of privatising premium recreation sites to the exclusion of the broader community is inequitable and elitist and sends a message that only the rich will be given access to the best of the park, which is contrary to the founding principle of national parks as a recreation resource for those too poor to holiday in hotels and resorts.	2e	Those too poor to holiday in hotels and resorts would not be excluded from the park. Additional campsites have been provided for in the management plan. With regards to ecolodge or safari tent accommodation, the only area that would be exclusively for the use of these clients is the accommodation site itself.
324	I strongly protest the proposal for an ecolodge. The only purpose such a lodge would serve would be to cater for the demands of an elite (group) who expect unreasonable access to limited resources such as water, accommodation space and facilities and staff services. The impacts of a significant accommodation structure in the park are inappropriate and will detract from the experience of all visitors. The Exmouth township resorts and accommodation houses should cater for tourists who demand such a level of accommodation.	2e	Ecolodge proposals that would result in ecologically unsustainable use of resources such as water or significant impacts on the park's key values (including recreational values) would not be approved. Proponents of ecolodge accommodation would have to demonstrate a strong nature appreciation focus. The setting and nature of development would provide a very different experience to that of accommodation in the township.

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
Commercial Operations			
325	As eco-tour operators pay license fees and have specialist knowledge of the area, they should have priority parking and be able to pre-book camping sites.	2e	T Class licence fees for commercial tour operators provide a contribution towards the cost of administration, and do not provide exclusive access rights. The booking system to be introduced for the park will allow pre-booking of camping sites.
326	CALM has failed to identify the upcoming changes in visitation within the park resulting from the current boom in tourism, industrial and residential projects, and has made no provision for these visitors nor for the commercial operators trying to facilitate the required service. There will be increasing numbers of Australian and international visitors, most without vehicles and totally reliant on a locally guided tour. The current facilities are already struggling to cope with seasonal growth (e.g. Turquoise Bay), and CALM's recommendation to deal with the issue by closing heavily used areas when full shows a lack of commercial realisation. Perhaps CALM needs to be reminded of its responsibility and legal obligation to support and sustain tourism development.	2c, 2e	The plan anticipates sustained growth in recreation and tourism demand and provides for increased opportunities (e.g. increased day use and camping capacity, walking, caving) all of which would also be available to visitors on commercial tours. However, any increases in visitor capacity must be carefully managed to ensure the park's natural, cultural and other values are protected. The CALM Act requires that recreational use within national parks is <i>consistent with the maintenance of the natural environment</i> . The plan incorporates a variety of measures to achieve this (e.g. staged implementation of capacity increasing developments, monitoring and assessment of visitation related impacts, access restrictions to protect threatened and other species). Gradual implementation of capacity increases aims to allow any associated impacts to be identified before changes become irreversible, and allows management approaches to be adapted where necessary. Ever increasing visitor numbers could not be accommodated in the park without adversely impacting on the park's ecosystems and the quality of the recreation experiences available, limits such as those which were proposed for Turquoise Bay are necessary to ensure these values are protected.
327	P97. I await with some interest details of CALM's proposal to "provide inland camping areas (e.g. Tulki Gorge, Bloodwood Gorge, Pilgonmum Gorge and on top of the range)". Will these camping grounds be open to commercial operators, will there be sufficient parking, will trailers be banned as is the standard practice at the most popular sites within the park (Turquoise Bay)?	1e	Inland camping areas will be small and therefore may provide for use by small groups. The final plan has been amended to explicitly state that group camping areas will be accessible to commercial and non-commercial groups alike. Detailed recreation site planning and development of group camping areas will consider special requirements that groups (including commercial groups) may have. Though, it is not feasible that facilities specifically for groups are provided at all recreation sites.
328	Due to the range being a remote and potentially dangerous place, access to these areas should be with professional commercial operators, thus limited numbers can have educated exposure to the range that CALM have kept the public largely unaware of.	2e	There are risks inherent in remote area recreation activities, however, it is preferable to use other management strategies to reduce visitor risks rather than resort to only limiting access to those on commercial tours. The proposals to improve inland recreation opportunities are aimed at helping visitors to gain a more comprehensive appreciation of the values of the park.

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
329	There appear to be only several commercial operators that conduct any sort of nature based experience. Changes need to be made by granting licences only to those who can establish that they are genuinely using the park. This would allow management to develop close working arrangements with a smaller group of interested operators, give CALM the opportunity to establish a code of conduct for operators and to further develop sustainable, low impact environmental tours e.g. walking, overnight safaris and camping.	2e	A variety of means can be and are used to require/promote appropriate conduct by commercial tour operators and their tour groups (e.g. licences have associated conditions, all operators are provided with a Tourism Operator Handbook with general and site specific information). The Department recognises the National Competition Policy and considers that imposing the restrictions suggested by the submitter are unwarranted for ecologically sustainability purposes, and therefore against the spirit of the National Competition Policy. Further, the Department provides facilities and services and manages commercial operations in the park in a way so as to protect the ecological and other values of the park, but the development of tours is done by the operators and not the Department.
330	It seems there is little regard or consideration for Commercial Tour operators within the draft management plan. Of the 109 campsites, none are for tour operators. I see no reason for not putting areas aside for commercial operators as is standard practice in other national parks in Western Australia and indeed Australia wide, as is the standard of pre-booked favoured sites.	1e, 2c	The plan provides for group camping, and this allows for the use of those sites by commercial operators as well. This has been made more explicit in the final management plan. With the introduction of a booking system, commercial operators would be able to pre-book group camping sites.
331	It is within CALM's responsibility as land manager to provide some service to commercial operators. As an operator I must meet substantial requirements and make considerable financial contributions to fulfil CALM's requirements and I in turn have an expectation for a small level of service (e.g. campsites for the exclusive use of commercial operators, ability to pre-book sites).	2c	The licence fees paid by commercial operators make some contribution to the costs of licence administration, but do not equate to cost recovery. Pre-booking of sites will be available once a booking system is implemented. See discussion for Comment 333 regarding exclusive use for commercial operators.
332	Request that licences issued by the Department to commercial tour operators who use the park encourage them to provide and/or facilitate: (1) Visitor education about the environmental impact of their use and how they can mitigate their impact; and (2) Accountability for their clients' detrimental behaviour or actions. There should be greater enforcement of conditions that comprise a commercial operator's licence.	2c	The plan includes strategies regarding the Department facilitating communication of appropriate information about the park's values and management by commercial operators (Sections 29 and 39). Conditions are attached to tour operator licences and the management of their operations is their decision as long as they are abiding by licence conditions.
333	New camping areas and a booking system should be developed for commercial groups.	2c, 2e	The plan provides for group camping, and this allows for the use of those sites by commercial operators as well. This has been made more explicit in the final management plan. With the introduction of a booking system, commercial operators would be able to pre-book group camping sites. In the interests of providing equitable public access, the Department would not generally provide priority or exclusive access for visitors that are associated with a commercial tour,

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
			unless there are compelling environmental or other management reasons for doing so.
334	P101. The statement that reads "There are currently 179 operators licensed (T Class) to operate in the Cape Range National Park, although not all run tours in the park", is somewhat misleading given that <u>most</u> of that number do not run tours in the park.	1e	The plan is amended to read "there are currently 179 operators licensed to operate in the park, although most do not run tours in the park".
335	Most operators only access the park for day visits to sites like Turquoise Bay, without doing much other 'touring' through the remainder of the park. Tourism WA considers commercial operators, particularly those locally based, should be encouraged and assisted by the Department, to develop terrestrial based tours that utilise the park more widely, thus alleviating some of the pressure on key use sites.	2c	The plan includes strategies to develop greater visitor opportunities away from the coast - these opportunities are to be made available to encourage greater diversity of recreation opportunities for all visitors, including those associated with commercial operators.
336	Tourism WA have a strong belief that Commercial Tour Operators should be supported under appropriate control measures to operate within the park. We believe that this is the best way for people to experience the park in a controlled manner. This is based on the theory that it is easier for the Department to monitor a small number of operators rather than each of the thousands of individual visitors.	2b	The plan provides for visitors to enjoy the park either with a commercial operator or independently - both are legitimate ways to enjoy the park.
337	P100. Tourism WA are supportive of the concept of commercial opportunities being developed at Milyering (café, booking tours) and the leasing of such enterprises to commercial operators. We also strongly believe that the development of this option should not preclude other sites and options being explored for potential commercial enterprises, given the dynamic and evolving visitation to the park.	2a	Section 29 of the plan includes provisions for considering tourism concessions over the life of the plan.
338	Page 66 Para 4. Support for more robust recreation sites. Extra provision should be made for vehicles towing trailers and caravans, and areas designated for tour operators.	2d	These factors are considered in more detailed recreation development planning. In the interests of providing equitable public access, the Department would not generally provide priority or exclusive access for visitors that are associated with a commercial tour, unless there are compelling environmental or other management reasons for doing so.
Development Setback			
340	We would expect that the spirit of the <i>Ningaloo Coast Regional Strategy: Carnarvon to Exmouth</i> be adhered to by the Department as well as the relevant State planning policies, and in particular the provisions of <i>State Coastal Planning Policy 2.6</i> with regards to setback requirements for infrastructure such as new roads and tracks. This is especially in relation to turtles and birds which rely on the shoreline for crucial stages of their life histories.	2c, 1e	The plan is consistent with the <i>Ningaloo Coast Regional Strategy - Carnarvon to Exmouth</i> . Protection of all native fauna is one of the Department's main responsibilities (including for example administration of the <i>Wildlife Conservation Act 1950</i>) and the plan includes numerous provisions for the protection of the fauna referred to (e.g. see Section 17 Native Animals and Habitats). The location of many of the coastal recreation sites have evolved through historical use

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
			patterns prior to active management and are not necessarily located within what would now be considered appropriate setback or suitable locations. Whilst the appropriate setback distances for new developments are routinely considered as part of the Department's site development planning process, the plan is amended to specifically refer to this topic.
Disabled Access			
341	We would have thought trying to identify if more people with disabilities were using the park (i.e. through a KPI) would be very important given it is an area where developments are being kept to a minimum, which does not help	2e	It is not feasible to measure every aspect of management. The lack of a specific KPI does not indicate that access for visitors with disabilities is considered unimportant or that the Department does not intend to implement relevant strategies (e.g. strategy 18 on page 77 of the draft plan) - it is not however identified as a key focus of managing this particular park.
Inland Recreation Opportunities			
342	A water point and toilet facilities should be installed at or near the Thomas Carter Lookout and other climbing areas for the use of rock climbers and other visitors. Such facilities would encourage climbers to camp in the vicinity of climbing areas and free up camping space in areas more popular with general visitors.	2c	The plan provides for the development of inland camping areas - climbers are one group that are likely to utilise these areas. Visitors are generally required to be self sufficient with regards to providing their water. Safety messages including taking water are included in publications and information signs.
343	Support for opportunities to camp and walk in the foothills. But, due to the unforgiving climate and terrain, such excursions may be best done under guidance, with defined trails, camping area and a toilet facility.	2c	Opinion noted. Matters such as these are considered during more detailed recreation site development planning.
Landscape Management			
344	Page 13 Para 5: Spectacular landscape is mentioned here but there isn't a section on landscape in Part C. Are landforms not reserved as part of the CAR? Is landscape not managed as part of managing the natural environment?	2c	Management of the individual components of landscape are discussed throughout Part C (e.g. landforms are discussed in Section 14 <i>Geology and Geomorphology</i>). A section which focuses on management of visual landscape qualities is included in the plan in Section 27.
Management Settings (Including Wilderness)			
345	I was intrigued as to why CALM was founding its management principles on those espoused almost 40 years ago. I am appalled to find that these principles that are being used for Crop's planning are not only antiquated, reliant on references and principles from the 1960's and early 1970's but is also founded on the experiences of the US Department of Agriculture and Forest Services.	2e	Given population growth and increasing demand for recreation in natural areas, the issue of recreational succession and consideration of a spectrum of recreation opportunity are even more relevant today. The <i>principles</i> underpinning the US Recreation Opportunity Spectrum (ROS) concept remain applicable to the management of protected areas in general, and are also used by park management agencies elsewhere in Australia. The broad principles of a ROS underpin the Department's Visitor Management Settings approach and are regarded as valid considerations for recreation management of protected areas in Western Australia including the Cape Range National Park.

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
346	Delete "any developments " from Point 1 on Page 71.	2e	Management settings are used to help prevent incremental development. It is important that the implications of any proposed developments that would result in a change in recreation setting towards the more developed end of the spectrum are thoroughly considered. The approvals process identified in the plan promotes consideration of incremental development issues.
347	P 71. " <i>Any developments that are inconsistent with the management setting criteria will invoke consideration of a review of the management plan</i> ". This statement appears to reduce the certainty with which, for example, natural areas will remain natural as long as there are no developments proposed for such areas. Will CALM consider a review of the management plan for any development that may be inconsistent with the relevant criteria? Or is it intended that 'any developments that are inconsistent with the management setting criteria would not be considered unless a review of the management plan made the necessary adjustments'?"	1e	It is intended that any proposed developments that are inconsistent with the management settings would require the approval of the Corporate Executive and Conservation Commission.
348	The plan states it wants to prevent incremental development - but what is being done about it? Is CALM offering to have an entry car park with regular buses going into the park? Is CALM setting number restrictions at popular sites? Just opening new sites is not an answer!	2c	The plan aims to limit incremental development by identifying those areas in the park where there remains opportunity for recreation in 'natural' areas (as described in Visitor Management Settings in Part E and the Management Settings Criteria table in Appendix 6 of the draft plan) and requiring Corporate Executive and Conservation Commission approval if a proposed recreation development would result in a change of management setting (e.g. increase from a 'recreation' setting to a 'highly modified' setting). This will increase awareness of the issue of incremental development and promote deliberate consideration of the cumulative impacts of site development decisions. In addition, the plan recognises that an area allocated to a more developed management setting should not necessarily be developed to the full extent of that setting, and therefore also identifies limits in the size of individual recreation sites (as per Table 6).
349	The plan does not demonstrate how the areas of potential wilderness indicated on Map 6 were arrived at - given the potential implications of declaring Wilderness areas, perhaps more explanation of how and why this determination was reached is required.	2c	The areas of potential wilderness for the area were a direct extraction from the National Wilderness Inventory. The criteria used for the NWI data are described in the section on wilderness. Note that the position on wilderness has been changed for the final plan and the Department will not be pursuing the creation of a wilderness area over the life of this plan.
350	Support for the creation of wilderness, which should be a priority. Then recreation such as the public access and walking tracks need to be	2e	The Department's position on wilderness has been changed in the light of public submissions to the draft, and the Department will not be

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
	taken into account - not the other way around!		pursuing the creation of a wilderness area over the life of this plan.
351	While discussion of the potential for creating a Wilderness Area is appropriate and correct - liaison with Defence will be required before this concept can go any further. Defence does fly out of RAAF Base Learmonth in transit and around the region for training, including the use of the Learmonth Air Weapons Range, all of which have high potential to constrain creation of a Wilderness Area in the immediate vicinity of RAAF Base Learmonth.	2b	The Department's position on wilderness has been changed in the light of overall public submissions to the draft, and the Department will not be pursuing the creation of a wilderness area over the life of this plan. Department of Defence activities were one of the issues that were considered in this revised position.
352	Map 6 identifies many areas outside the Cape Range National Park as <i>Wilderness</i> . The legend on this map covers areas identified and is misleading as the full extent of this <i>Wilderness</i> classification is unknown. The Plan notes that the criteria for the settings are still being finalised, yet the coverage is well outside the National Park. The concern is that this will lead to further restrictions being placed on residents and visitors to the Exmouth region through visitor management programmes.	1e	The area with wilderness values of greater than 12 under the National Wilderness Inventory is known. The submission comment suggests some confusion regarding the issue of wilderness areas - the plan has been amended to improve clarity. However the Department's position on wilderness has been changed in the light of public submissions to the draft, and the Department will not be pursuing the creation of a wilderness area over the life of this plan.
353	The concept of 'wilderness areas' (p69-70) to preserve parts of this area are absolutely critical. It is very important that CALM gazettes areas that meet the criteria once the plan is endorsed and additions to the park are ratified. We were surprised (and perhaps saddened) that Map 6 does not show more areas that would meet the criteria. The plan should comment on whether there was any way in which the wilderness area (including the proposed additions) could be expanded even further over time by making natural qualifying areas more remote from settlements or accessibility etc.	2e	The Department's position on wilderness has been changed in the light of overall public submissions to the draft, and the Department will not be pursuing the creation of a wilderness area over the life of this plan.
354	Given the concerns of the local community, Map 6 should only indicate potential wilderness areas within existing or proposed conservation estate.	No longer Applicable	See above.
355	The proposed creation of the designated Wilderness Area conflict with many options put forward in the plan such as those for road access over the range, walk trails and so forth that would essentially become null and void should the Wilderness Policy be adopted.	2c	The Department's position on wilderness has been changed in the light of overall public submissions to the draft, and the Department will not be pursuing the creation of a wilderness area over the life of this plan. Implications of creating a wilderness area for some of the recreation proposals were highlighted in the plan.
356	Clearly the creation of a wilderness area is on the agenda. Tourism WA could not find a clear justification in the draft management plan for why the said wilderness area should be created, and opposes the creation of the proposed "designated" Wilderness area. We further recommend review of relevant sections of the CALM Act to ensure	1b	See above. Suggestions regarding review of relevant sections of the CALM Act noted.

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
	wilderness areas can allow for a level of low-impact activities. Whilst Tourism WA recognises the importance of preserving the pristine natural environment that makes the park desirable, we are concerned, given the strict definition of acceptable activities within a CALM defined Wilderness area, that this designation would essentially close off the area to all commercial operators. In addition, a Wilderness designation would preclude walk trails over some of the most desirable parts of the range (due to associated infrastructure) and a host of other potential activities that would, in turn, be detrimental for tourism development in the area.		
357	A person cannot hear our aeroplane when it is flying over the reef at 1000 feet from the shore so there shouldn't be an issue with allowing scenic flights to fly at this height.	1b	The Department's position on wilderness has been changed in the light of overall public submissions to the draft, and the Department will not be pursuing the creation of a wilderness area over the life of this plan. The heights specified in the plan were consistent with the Department's Wilderness Policy (Policy Statement 62d - <i>Identification and Management of Wilderness and Surrounding Areas</i>) which was developed with public/stakeholder consultation.
357	Why does the plan propose to allow helicopters to fly at 1500 feet but aeroplanes which are much quieter at 2000 feet?	2b	The Department's position on wilderness has been changed in the light of overall public submissions to the draft, and the Department will not be pursuing the creation of a wilderness area over the life of this plan. The differentiation between helicopters and aeroplanes is consistent with the Department's policy regarding management of wilderness. The differentiation was incorporated into that policy to be uniform with <i>Airservices Australia</i> national standards. This is also consistent with other natural areas across Australia where <i>'Fly Neighbourly Agreements'</i> are in place.
358	Scenic flights are a great way of 'look and don't touch'.	2b	Noted.
359	We operate flights over water following the reef line and away from public areas. They are normally at over 1500 feet, however there are times when we fly at 1000 feet so our clients can take photos. I request that aircraft flight rules remain as they currently are for our Cessna 172 aeroplane (only light aircraft operator in Exmouth and Coral Bay) as these flights are not causing any harm and are much quieter than larger planes that fly over other parks in WA .	No longer applicable.	The Department's position on wilderness has been changed in the light of overall public submissions to the draft, and the Department will not be pursuing the creation of a wilderness area over the life of this plan.
360	As there are no helicopter tour operators in the area, there shouldn't be a problem with these.	No longer applicable.	See above
361	Tourism WA is a strong supporter of closing relevant areas to mechanised transport and vehicles as it broadens the overall mix of	2b	Noted.

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
	experiences on offer in the park.		
Shade			
361	Selected day use sites would benefit from having shade facilities. The overall lack of shade in the park limits the capacity of visitors to recreate. Planting of local natives should be given priority for shade. Shade cloths are an alternative option, however require management during cyclone alerts.	2e	While there are some existing plantings of tamarix trees in the park, the planting of further exotic species is not appropriate or consistent with modern day approaches to management of conservation reserves. Most of the park's recreation sites are situated along the coast line where vegetation is naturally characterised by low heaths, and therefore the planting of larger shade-bearing trees into this vegetation would not be appropriate. Minimal shade facilities that complement and fit in with the natural landscapes may be provided in association with the development of day use sites as proposed in the plan.
Special Events			
362	Does the Conservation Commission approve an event, or is consultation with them adequate?	1e	The Department would consult with the Conservation Commission on all large scale events with the potential to significantly impact on the key values of the park.
363	P89. Special Events. The plan states that events will not be allowed unless they are of national significance, but there is no explanation why national significance will be any better than State or local significance. Special events should be considered on a case by case basis. Tourism WA requests that this statement be amended to state that only events endorsed by Tourism WA's EventsCorp division (and therefore of State or National significance) will be allowed and consequently be given priority.	1b	Plan amended.
Jurabi/Bundegi			
364	The plan indicates that it is the position of the Conservation Commission that the CALM Act cannot satisfactorily accommodate joint vesting of reserves and is advocating that it should be the sole vesting body for the Bundegi and Jurabi Parks and the UCL land between the lighthouse and Exmouth townsite. This is of concern as there is potential for the access fee to be extended to all beach accesses on the west coast of North West Cape. The management plan makes no mention of access fees, nor does it contain the policy for same. Free access to beaches is regarded by the public as a right, and this principle has been clearly articulated by Government. There has been a policy, not widely acknowledged, that persons making day visits to Cape Range National Park for the specific purpose of fishing are exempt from access fees. This policy should be included in the plan.	2c	The plan was not proposing sole vesting for the Bundegi and Jurabi Coastal Parks (See discussion for Comment 61). The Department's Policy Statement No 18. <i>Recreation, Tourism and Visitor Services</i> which details policy regarding visitor fees. Policy 18 states that <i>holders of recreational fishing licences</i> are not required to pay a park entry fee if entering only for the purpose of their licence, however they are required to pay camping fees if they stay in the park overnight. The plan refers to Policy 18, but does not include all of its detail.
365	The Jurabi Turtle Interpretive Centre has been omitted altogether on P	1e	Reference to Jurabi and Bundegi Coastal Parks in the title of Table 6 is

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
	94. What is its proposed status and use? (I realise it is not in the current park boundary).		an error. There are no plans to change the status/use of this site.
Rubbish Management			
366	Removing all rubbish bins is a very bad idea as people would throw their rubbish into the bush - this already happens along Yardie Creek Road.	2e	Rubbish along Yardie Creek Road is very likely to have been thrown from vehicles - and the presence of bins in the park is unlikely to be an effective means of preventing this behaviour. The Department promotes responsible visitor behaviour in managing litter. There are many examples of natural areas where a 'carry out' rubbish policy have been effectively implemented if done in conjunction with educational programs.
367	Support for "take your rubbish out" policy if it is explained and there is a drop off point for garbage and recycling clearly placed on the edge of Exmouth.	2a, 2c	Agreed that visitors need to be well informed of the need to remove their own litter. The details regarding where recycling materials are collected are an operational matter not necessary for inclusion in a document aimed at providing long-term management direction.
368	P99. Rubbish collection. I would be happy to carry my rubbish, in my kayak, for up to five days to a central bulk collection trailer in the park or similar, as long as it is accessible for kayaks or canoe paddlers, i.e. no more than 100m or so from the beach.	2a	Noted
369	The option of removing rubbish bins from the park is not supported, as it is likely to cause dumping/exporting the problem onto neighbouring areas and in the Park, especially for campers staying more than a few days. This option also shifts the burden to the Shire and ratepayers to manage landfill generated by park users.	2e	The no rubbish bins policy is applied effectively elsewhere in the State. The Shire of Exmouth is responsible for management of landfill etc within the Shire, and therefore rubbish is already being removed and deposited in landfill or otherwise managed by the Shire.
370	Support the following proposals for rubbish collection: (1) Establish one or two collection points where visitors can place rubbish directly into a trailer for removal; (2) Provide and service rubbish bins at campsites and major day use sites during peak tourism season, especially school holiday periods.	2c	Suggestions noted.
Water Extraction/Contamination (Recreation Impacts)			
371	Page 168, 1.4.9 Sewage Treatment, Guideline 9: Disagree. Considering the fluctuations of inflow are likely to vary with high/low loads associated with peak/off-peak tourism periods - these suggested levels are considered optimistic at best. In addition, trickle irrigation to natural vegetation may result in mortality with the higher concentrations expected during peak use. Consultation is recommended to further clarify this before supporting this guideline.	2d	These are quotes from extracts of other documents that were included in the plan.
372	Regarding Sewage Treatment: while there is the potential for nutrient infiltration into the groundwater to affect stygofauna, the degree of this	2e	Lack of full knowledge should not be a hindrance to enacting management to conserve biodiversity. It is important that the plan

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
	influence is still unknown.		communicates that nutrient infiltration may be a threat to subterranean fauna.
373	I do not believe there is any significant capacity for the west coast of CRNP to provide water or treat and dispose of quantities of grey-water without great risk to the environment. The delicate balance of fresh and salt-water lenses is well documented and even modest extraction must be carefully managed. The importance of the unique stygofauna of those aquifers is also well documented. Contamination risk from any large storage of grey-water, chemical treatments etc must be a significant consideration.	2c	The importance of protecting the area's unique hydrology and associated biota is discussed throughout the plan where relevant. The plan does not support the implementation of any proposals with the potential to adversely impact on these values unless these impacts can be effectively prevented or mitigated.
RESOURCE USE			
374	Re Table 1 - Main Roads has ongoing requirement for the extraction of road building materials in and adjacent to the Cape Range National Park for improvement and maintenance of the Minilya-Exmouth Road.	2g	The Minilya-Exmouth Road is neither within or adjacent to the national park.
375	Both Main Roads and the Shire of Exmouth have resource requirements for road maintenance and improvements. Sourcing of road building materials within the National Park by Main Roads and the Shire of Exmouth for road maintenance and improvements should be considered on environmental impact and cost effectiveness criteria. Consideration should be given to expanding Section 33 to encompass Main Roads and Shire of Exmouth operations for roads in and adjacent to the national park that provide vehicle or management access to communities and the national park.	1e	There is a general presumption against the use of basic raw materials from national parks, however the final plan outlines some criteria and a process under which extraction proposals could be considered on a case-by-case basis.
376	I am concerned over the number of quarries that have been made within the coastal plain of CRNP. This practice is obviously unsustainable. I also question if the targeted quarrying of a particular soil type and depth may be destroying a particular habitat type. I also question a regulatory circumstance that has permitted quarrying in a national park that seems to have avoided the proper EIS, EMP requirements that would have been applied if such quarries were proposed on the NW Cape on lands outside CALM's unilateral jurisdiction.	1b	The final plan has been amended to provide some further clarity regarding the Conservation Commission/Department's position in relation to extraction of Basic Raw Materials.
377	Submitter objects to approving use of wildlife by Aboriginals as they do not live in Exmouth and should not get special treatment.	2e	Opinion noted.
378	DOIR is concerned about the stated objective for <i>Mineral and Petroleum Exploration and Development</i> . Mining proposals will be confined to the Conservation and Limestone Resource Management	1e	The agreement referred to by the submitter is acknowledged within the text of plan (e.g. in Section 12 and on Section 32 - page 105). The objective is amended to include reference to this reserve.

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
	5(1) (h) reserve under the CALM Act 1984, as was agreed between the then Department of Minerals and Energy and CALM, in order to allow other proposed additions to the National Park. It is important to recognize that the proposed additions to the national park are contingent on the creation of the 5(1) (h) reserve. Temporary reserves held for mining in the northern areas of Cape Range will then be surrendered in recognition of the area's visual amenity value to the park.		
379	The approvals process and requirement to provide an Environmental Review and Management Program in order to mine in the 5(1) (h) reserve ensure that any mining activity that would significantly threaten the high conservation values of the park, or have adverse impacts, would not be approved. Hence submitter suggests a more appropriate objective may be: <i>"...to ensure that mineral and petroleum exploration and development within the designated reserve do not compromise the values of the park and its proposed additions"</i> .	2e	The plan acknowledges previous ministerial agreement to the creation of the 5 (1) (h) reserve. However, the objective will be amended to add include reference to this reserve.
380	Re point 5 on page 107: while CALM's encouragement for post mining rehabilitation objectives is appreciated, what is currently in the plan is not the avenue through which such objectives are achieved.	1c	The Department has an interest in the standard of rehabilitation of sites within these areas and it is appropriate that it provide advice on such matters if it is considered necessary.
381	Re strategy 1, page 108: "reasonably available" with regards to basic raw materials needs clarification. Suggest replacement with "only if no other resource is available within cost and logistical limitations".	1e	Text has been amended to clarify the Department's and Conservation Commission's requirements with respect to obtaining basic raw materials from the park.
382	Government agencies must be very strong and protective in their role re mineral and petroleum exploration and development, with regards to not only the park but all parts of the public conservation estate. We see it as the last line of defence against the 'pursuit of the holy \$' in this pristine area.	2b	Opinion noted.
383	Section 32. The WASG maintains its concern regarding the 1996 Government agreement for a 5 (1) (h) reserve. Mining is incompatible with the maintenance of both the ecosystem and the karst landforms. The WASG refer CALM to the extensive report of recommendations by the Mining Warden Mr Calder in the case Finesky vs ASF. The mining interests should be redirected towards the nearby Rough Range, which contains limestone that does not have the same subterranean wetlands issues as found in the Cape Range karst system. WASG would recommend CALM liaise with speleological experts regarding any proposed mining activity in the karst of Cape Range, to enable the key values of the karst to be assessed, acknowledged and considered in	2c, 2f	The Government's commitment to establish the 5 (1) (h) reserve arose from agreements between the Minister for Mines and the Minister for the Environment in 1996 - this agreement represented a compromise to resolve conflicting mining and conservation interests in lands proposed for addition to the conservation estate. The Department of Industry and Resources have informed that a large 'Temporary Reserve' held for mining along the eastern side of the Cape Range peninsula will not be rescinded until the 5 (1) (h) reserve is created. The plan referred to the need for consultation with experts in karst in assessing environmental impacts of mining.

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
	relation to the impacts and threats of mining.		
384	Broad-scale mining of limestone in CRNP or in the area falling within the proposed additions to the conservation estate is not supported.	2f	Noted. The proposed Conservation and Limestone Management reserve is associated with previous agreements by the Ministers responsible for the Mining Act and the CALM Act.
385	Support for the plan's proposals to classify proposed additions as national park; enforce current government policy that national parks are not available for new mining and petroleum tenements; and regulate mining exploration and access. The guidelines outlined in the plan are essential given the global significance of the karst system and the potential for mining activities to negatively impact this system and the ecological integrity of the broader Cape Range area.	2a	Support noted.
386	Limestone mining activities in the reserve designated "Conservation and Limestone Resource Management" is not supported without further environmental survey work and prior assessment under the <i>Environmental Protection Act</i> and the <i>EPBC Act</i> .	2c	The Environmental Protection Authority has jurisdiction for assessment under the Environmental Protection Act. Section 32 includes strategies for the Department to refer and provide information and advice regarding assessments under the Environmental Protection Act. As indicated in the plan, assessment under the EPBC Act would be triggered when actions would be likely to have a significant impact on matters protected under that Act (e.g. World Heritage property, Ramsar wetlands, migratory species listed under the Act).
387	Rock wallabies have been sighted in an area believed to be part of the proposed 5 (1) (h) reserve. Mining in areas of remaining rock-wallaby habitat is inappropriate given their threatened status.	2c	Noted. In referring exploration or mining proposals with the potential to impact upon the values of the park, the Department/Conservation Commission would highlight specific significant threats such as threats to rock wallabies.
388	This section should include a strategy to "identify acceptable areas for activities associated with oil spill management".	2g	Submission comment unclear. There are a range of potential threats associated with mineral and petroleum development to the values of the park - these are dealt with in a general sense in the plan but it is not feasible to include details of all possible eventualities.
389	The Department of Defence notes the sympathetic policy for allowing Defence force training if impacts on the park are minimal - this reflects the good relationship between the WA Government and the Department of Defence in WA, and in particular the close liaison achieved at the local level through CALM's participation in the NW Cape Defence Estate Environmental Advisory Committee (DEEAC).	2b	Noted.
390	Sections 34 (Defence Force Training) and 35 (Emergency Services Training) - The WASG would like to specifically be involved in any consultation where such activities involve karst features such as caves. If CALM were to consider a request for cave rescue training in caves (which WASG considers unnecessary), then it is important that	1a	The plan acknowledges that consultation with the North West Cape Karst Management Advisory Committee (which includes a representative of WASG) is an important facet of management of activities with the potential to significantly impact on karst and associated values, and includes strategies which recognise this. The

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
	particular impacts to karst systems such as the biota and speleothems be assessed via an environmental risk assessment. The WASG would also like to ensure that such groups had access to the ASF "Minimal Impact Caving Code" and in particular, the "Minimal Impact Cave Rescue Code".		plan is amended to include reference to the ASF codes of conduct.
391	P87, Point 4. The WASG would express caution regarding undertaking 'practice' cave rescue exercises in caves.	2b	Opinion noted.
COMMUNITY INVOLVEMENT			
392	The performance target for this section of 'remain stable or increase' does not set a goal of innovation, improvement or enthusiastic engagement with the community.	1d	
393	Tree planting and seed raising is another area where the local community can help and at the same time nurture a responsibility for the national park and coastal parks.	2c	Noted. The plan (pages 116-117) provides for community involvement projects, although given the wide variety of potential projects it does not provide details of what those projects might be. Planning of community involvement projects would occur as part of implementing the plan.
394	Giving the local community some ownership of ideas and projects within the park will make the whole vision one of pride and success for all involved.	2c	Section 40 of the plan refers to the importance of community involvement.
395	I believe it is vital to include the local community in all phases of park planning. The Conservation Commission are to be commended in recognising the value of community support. However, in the case of Cape Range, ground needs to be made up for the lack of public consultation in the past, as it is evident there is a lot of mistrust of the process and of CALM, in particular amongst the local community and many tourism operators.	2c	Section 40 of the plan refers to the importance of previous and ongoing community involvement in the development and implementation of the plan.
396	Given CCG's interest and community-based contribution to surveying and monitoring Cape Range's rock wallabies, we would like the opportunity to continue working with the Department and participating in development of interpretive material and recreation sites known to be rock wallaby habitat.	2c	Community involvement and support is valued and an important aspect of managing the park - this is noted in Part G of the plan and elsewhere throughout the document. Whilst the Department has noted the offer to contribute, details such as this are further considered as part of implementing the plan and not necessary for inclusion in a long-term strategic document.
397	The Coral Coast Parks Advisory Committee has proved to be nothing more than a committee formed to facilitate the Department's requirement for consultation (e.g. advice given during for the marine park plan was disregarded).	2b	The Coral Coast Parks Advisory Committee was formed to provide advice that can be considered by the Department, vesting authorities and Government who have ultimate decision making responsibilities. The advisory nature of the committee was clearly stipulated in its Terms of Reference. Whilst not all of the committee's

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
			recommendations are implemented, many are.
398	Submitter has concerns (based on previous experience with plans produced by the Department) that proposals in the final plan will be very different to the draft, and that the public will not be able to comment on these.	2b	DEC can re-release a plan for public comment if changes made to a draft are considered significant enough to warrant this. This has not been considered necessary for the final Cape Range National Park Management Plan as the key principles and proposals are consistent with the draft released for public comment.
399	Submitter expresses view that any negative submission will be disregarded by the Department.	2b	DEC evaluates all submissions including "negative" ones according to the criteria listed in the draft management plan. Submissions that focus on constructive criticism are useful.
400	Submitter puts forward the view that the Department doesn't listen to the community and take their ideas on board, and states that the Department's public image in town "could not possibly be worse".	2b	The community's' views can be very diverse and often conflicting, as evidenced by the comments within this analysis of public submissions for example. The draft plan indicates the criteria that all submissions are assessed against. The Department will continue to promote local community involvement in and support for protection of the conservation and recreation values of the marine park and national park.
401	In regards to the action taken by the Shire of Exmouth (petition and comments by Shire President) - the residents of Exmouth deserve to be informed of the amount of discussion that has taken place between all parties, the opportunity the Shire has had to respond, and their failure to do so. The amount of misinformation that has circulated requires official response by either the Minister privately to the Council or by a public statement. It is unfortunate that a few people can brainwash the community to such an extent.	2d	Noted.
402	It is hoped that the Shire nominates a representative (i.e. Shire Councillor) to the Coral Coast Parks Advisory Committee.	2d	Noted.
403	This review of the management plan is almost a decade overdue in contravention of the Department's own Act. This has allowed the park to be managed without credible stakeholder input (particularly community) for the last decade.	2b	Under section 55 of the CALM Act, the term of a management plan is 10 years OR until the plan is superseded by a new management plan. Stakeholder input into the Department's management activities can and does occur through a wide variety of means and is not limited to when a management plan is developed.
404	The plan is satisfactory in covering most issues however certain aspects do not seem to give enough information or evidence to prove one way or the other that the 'plan' is going to be considered best practice with all the stakeholders e.g. the 'land grab' that is of grave concern to most local residents and many visitors to Exmouth, the Coastal Tourism Framework, control of feral animals and visitor access issues.	2b	Prior to being released for a 3 month public comment period, the development of the plan involved other public consultation as described on page 4 of the draft. The community's' views can be very diverse and often conflicting. While the wide variety of opinions received are all considered, it is not always possible to accommodate all suggestions, neither would it necessarily be appropriate as the Department and Conservation Commission must consider submissions

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
			in the light of legislated and other responsibilities.
405	Submitter disappointed that they first heard of the public comment period for the Draft Management Plan until the public submission period had been extended - there was insufficient time to prepare an adequate submission.	2b	The Department advertises the release of draft management plans for public comment. Advertising of the release of the Cape Range National Park Draft Management plan included (but was not limited to) multiple advertisements in the <i>West Australian</i> , the <i>North West Telegraph</i> and <i>Northern Guardian</i> newspapers; advertisement in the <i>Government Gazette</i> , the Department's WebPages (<i>Naturebase</i>), other government WebPages (e.g. <i>Consult WA</i>) and local libraries; direct contact of stakeholders that had previously registered their interest, direct contact of stakeholder representative groups, broadcast emails (e.g. licensed tour operators), signs and/or posters etc within Cape Range National Park; posters, 'manned' public displays and letter box drops within Exmouth. News of release of the plan by Minister Mark McGowan was also aired on major TV stations.
406	It is very hard to put in further effort for these proposed plans when we are notified that the public submissions will be reviewed and summarised and the management plan MAY be revised accordingly.	2f	The public submissions process is an important part of the management plan development process. However, public views can be widely divergent, as reflected in this analysis of public submissions. It would be impossible to amend the plan to accommodate all submissions, neither would it necessarily be appropriate as the Department and Conservation Commission must consider submissions in the light of legislated and other responsibilities.
407	Public Participation. We would like to thank CALM for the opportunity to be involved in the stakeholder consultation process and to be able to provide input prior to development of the draft management plan. We consider that this process has been highly successful and productive. It is pleasing to see that the draft document produced has included key concepts and issues that were discussed as part of this process.	2a	Noted.
408	P. 87 Point 2 states a number of speleological groups. We would advise CALM to check the ASF website (www.caves.org.au) regarding ASF member groups in WA, and to include SRGWA in the bracket.	2c	The plan provides for consultation with relevant speleological groups and while it provides some examples it is not intended to be a comprehensive list. These groups may also change over the term of the plan (which can be 10 years or more).
409	There is some concern in the Exmouth community that should the land envelopes in the "conservation and land use investigation areas" become part of the conservation estate, the Town of Exmouth might be constrained in its growth. The Department and the Conservation Commission need to raise this issue with the WA Planning Commission to attempt to allay community concerns regarding this.	1b	The plan identified that the Department (on behalf of the Conservation Commission) is one of several stakeholders with legitimate land use interests in these areas. These areas will be subject to planning by the WAPC. The Department will undertake biological survey and other research to provide information to be considered in that planning process. The plan has been amended to improve clarity on these

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
			points.
410	The Department and the Commission should continue to consult with stakeholders as the plan is finalised and to furnish the local community in particular, with full and accessible explanations for the proposed management actions, including potential expansion of the estate. Providing for stakeholders to receive briefings from independent scientists with good knowledge of the area's ecological values might be a worthwhile endeavour.	2b	The Coral Coast Parks Advisory Committee and the Coral Coast Park Council have been consulted in the finalisation of this management plan. The suggestion regarding briefings by independent scientists is noted.
411	The draft plan is a large, comprehensive and relatively technical document that targets a literate audience. Thus many people do not read the document and therefore remain uninformed, limiting their capacity to provide valuable knowledge and feedback. The Department may benefit by preparing additional material that is comprehensive to a larger audience.	2f	While not possible for this plan as the public submission period has now closed, the Department acknowledges that the suggested actions may be of benefit and will consider this for other planning processes.
412	In future planning exercises pertaining to key tourist areas like Cape Range, Ningaloo MP, Karijini, Purnululu and Nambung, Tourism WA should be included in the planning team to add significant value from a tourism perspective.	2c	DEC recognises Tourism WA as a key stakeholder for all management planning processes. Tourism WA were invited to provide input during the preparation of the draft management plan.
413	Support for the displays and information and services provided at the Milyering Visitor Centre.	2a	Support noted.
414	A lay-by and tour map should be installed on the edge of town to help people plan their trip (e.g. with details such as alternative sites to Turquoise Bay, boat times for Yardie Bay and guided tours).	2h	Whilst this is a suggestion that the Department will consider pursuing, details regarding specific information displays are an operational matter and not necessary for inclusion in a document aimed at providing long-term management direction.
415	Support for the proposals in section 39	2a	Support noted.
416	Will information objectives be made available to the public in print or electronically?	2g	Submission comment unclear.
417	There are concerns that increased visitor use will lead to the destruction of the biodiversity values and pristine environments within CRNP. There is therefore support for the plan's proposals outlined on P 116, which will increase awareness of the importance of (natural and cultural) conservation and accountability of park users. An information	2a	Noted. Information such as this is often included on signs, brochures and other communication material produced by the Department.

No	SUMMARY OF COMMENT	CRITERIA	DISCUSSION
	brochure could be distributed to visitors containing information and explicit codes of behaviour.		
418	The Department should continue to improve the provision of interpretation through signage and other means within the Park. This needs to be done with particular sensitivity to enhance the visitor experience of the area's natural qualities.	2c	See Section 39 <i>Information, Education and Interpretation</i>
419	The management plan should include a commitment to provide educational material and information to the general public in order to expose the biodiversity values, threats and conservation strategies that will help to protect the globally significant hydrological system of Cape Range.	2c	See strategies in Section 39.
RESEARCH			
420	Support for existing and proposed research as described on pages 119-120. The funding that is required to achieve this must be pursued.	2a	The Department will need to consider the research requirements identified in the plan in the context of research priorities across the State's conservation reserve system as there are not unlimited resources to undertake all important research. Resources for research and other management priorities is considered in the business case the Department puts to Government as part of its resource allocation process.
421	Detailed study of the flora and fauna of Cape Range is essential to understand it and to monitor its future as well as to explain the park to visitors.	2c	The plan includes strategies for research and monitoring of flora and fauna.
422	Specific endorsement of the draft management plan in the area of research and knowledge.	2a	Support noted.
423	Relevant information gained through Departmental research should also be available to community groups and the general public. Suggest the plan be amended to read "Relevant information gained through Departmental research, monitoring and experience will be provided to the District and Region where it can be stored, updated and used by Departmental staff as well as the WA public and stakeholders.	2c	In principle, the Department supports the public dissemination of such information - although constraints associated with (for example) the completion status of the research or publishing issues (e.g. requirements for peer review) may result in this not always being possible. The Department recognises the importance of disseminating the results of research and actively encourages scientists to regularly publish findings. Strategy 4 in Section 42 <i>Research and Monitoring</i> is amended to refer to research findings being made publicly available.

APPENDIX 1 SUBMITTERS TO THE DRAFT PLAN

Individuals

L Baddeley
P Baddeley
J Burley
R Campbell
R & B Collins
M Cox
D Cowie
W Crisp
K Dennis
S Ferrarri
I Garthwaite
Blake Gray
P Green
Kim Greene
S Haines
R Van Leeuwen

D Harrington
D James
J & S Jupp
R Karniewicz
H Koop
C Koop
S Lennon
J Lerch
A Liu
G Lyon Roberts
N & K Pearson
M Rae
G Rykers
K Threlkelo
M White

Business and Commercial

Eric Roulston Norwest Air Work

Community Groups/Representative Groups

K. McGregor Cape Conservation Group
P Calais Climbers Association of Western Australia
Kim Greene Exmouth Cape Boardriders
F Prokop Recfishwest
C Priest Swan Canoe Club (Inc)
B Carson The West Australian Field and Game Association (Inc)
Jay Anderson WA Speleological Group
G Llewellyn WWF Australia

Committees

Coral Coast Park Council
Exmouth RRFAC

Local Government

P Anastasakis Shire of Exmouth
A Dowling Shire of Carnarvon

Department of Environment and Conservation

J Kirby DEC Exmouth District
R Quartermain DEC Tourism Branch (Policy and Planning)
Rick Sneeuwjagt DEC Fire Management Services

Other State Government Agencies

A Maskew Department of Environment
M Schwede Department of Indigenous Affairs
I Briggs Department of Industry and Resources
H Maclean Department of Sport and Recreation
S Carrick Heritage Council of Western Australia
D Lundberg Main Roads Western Australia

D Temple-Smith	Ningaloo Sustainable Development Office
R Muirhead	Tourism Western Australia
Sue Murphy	Water Corporation
R Anderson	Western Australian Museum
WF Humphreys	Western Australian Museum

Commonwealth Government Agencies	
B Wykes	Department of Defence

Politicians	
Hon J Ford	Minister for Local Government and Regional Development