

ANALYSIS OF PUBLIC SUBMISSIONS TO THE INDICATIVE MANAGEMENT PLAN FOR THE PROPOSED WALPOLE & NORNALUP INLETS MARINE PARK

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Prepared by the
Department of Environment and Conservation
for the
Marine Parks and Reserves Authority



Department of
Environment and Conservation
Our environment, our future 

MPRA
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INTRODUCTION

Prior to the gazettal of a marine conservation reserve, the *Conservation and Land Management Act 1984* (CALM Act) requires that the Minister for the Environment release an indicative management plan to provide an opportunity for the community to comment on the proposal. On 27 August 2006, the *Indicative Management Plan for the proposed Walpole Nornalup Inlets Marine Park* (the plan) was released for public comment.

At this time, advertisements were placed in the *Government Gazette* and two editions of the *West Australian*, *Albany Advertiser*, *Denmark Bulletin* and *Manjimup-Bridgetown Times* and one edition of the *Walpole Weekly* to advise that the plan was available for public comment. The plan was distributed to State and Local Government departments, tertiary institutions, libraries, peak bodies, stakeholder groups and numerous individuals who expressed interest during the planning process. A 'Have Your Say' brochure and submission form were produced and distributed with each copy of the plan to assist the community in preparing a submission. The plan was available for inspection at the offices and libraries in the Shire of Manjimup, Plantagenet and Denmark. Copies of the plan were available at the Department of Environment and Conservation (DEC) offices in Kensington, Fremantle, Walpole, Manjimup, Pemberton and Albany. Electronic copies of the plan and 'Have Your Say' information package were also made available on the DEC's NatureBase web site and interested parties were able to lodge a submission electronically.

The public submission period closed on 1 December 2006. A total of 38 submissions were received by this date. This document outlines how the submissions were summarised and provides an analysis of the public submissions. It also indicates if the plan was amended, and the reasons why or why not, as a result of the public submissions.

METHODS

The public submissions to the plan were analysed and the final management plan was prepared according to the process below.

- All submissions were recorded in a database as they were received.
- All comments were summarised and collated according to the section of the plan they addressed.
- The Walpole and Nornalup Marine Park Focus Group was reconvened on 7 March 2007 to review the submissions and provide their final advice to the Marine Parks and Reserves Authority (MPRA).
- The submissions, a summary of the key issues arising from the submissions and the Focus Group advice were provided to the MPRA for their consideration. The MPRA then provided their formal advice to the Minister for the Environment.
- The Government then considered this advice and the issues raised during the public submissions period. On 8 May 2009, the Government gazetted the Walpole Nornalup Inlets Marine Park (the marine park). The Government also announced the final decisions with respect to the zoning for the marine park.
- DEC prepared a final management plan to give intent to the Government's decisions and address finer scale issues raised during the public submission period.

- The final management plan for the Walpole Nornalup Inlets Marine Park was approved by the Minister for Environment on 10 June 2009.
- The analysis of public submissions was finalised and made available to the public, outlining whether the plan was amended in relation to the issues raised in the submissions.

RESULTS OF THE ANALYSIS OF SUBMISSIONS

A total of 38 submissions were received on the plan for the proposed marine park, comprising 28 'Have Your Say' forms (hardcopy and electronic), 1 email and 9 letters. The majority, 29 (76%), of the submissions received were from individuals with 9 (24%) received from organisations representing conservation, tourism, recreational fishing, community interest and government sectors. Submitters were asked to identify their primary, secondary and tertiary interests in the proposed marine park (Table 1), with the majority of submitters, 39%, identifying recreational fishing as the main primary interest, followed by a government department/authority and recreational boating (both 21%).

Table 1: Origin of submissions by interest

Interest	Primary Interest (%) ^Ω	Secondary Interest (%) ^Ω	Tertiary Interest (%) ^Ω
Conservation	4 (10%)	1 (3%)	5 (13%)
Indigenous use	-	1 (3%)	-
Local/State Government Department or Authority	8 (21%)	-	-
Marinas/jetty/boat ramps	-	5 (13%)	2 (5%)
Not identified	2 (5%)	15 (39%)	15 (39%)
Other	2 (5%)	-	1 (3%)
Recreational boating/canoeing	8 (21%)	9 (24%)	3 (8%)
Recreational fishing	15 (39%)	4 (10%)	2 (5%)
Research	1 (3%)	1 (3%)	-
Scuba diving	-	-	1 (3%)
Sightseeing/tourist	1 (3%)	2 (5%)	2 (5%)
Swimming/snorkelling	2 (5%)	-	6 (16%)
Tourism industry	2 (5%)	-	-
Waterskiing/parasailing/high speed freestyle motorised water sports	1 (3%)	1 (3%)	1 (3%)

^Ω Columns do not always add up to 100% as some people did not indicate their order of interest and others selected more or less than 3 interests.

Submitters were asked to provide an indication on the level of overall support for the plan, the zoning scheme and comments or suggestions for specific issues (Tables 2-4). Overall most people indicated that the plan provided a good balance (47%), with a few submissions stating opposing views either for more conservation or for more use and access (Table 2). Submissions indicated overall support (71%) for the zoning in the proposed marine park (Table 3).

Table 2: Overall comment on the plan

Level of support	Number (%)
Significantly more emphasis on conservation required	1 (3%)
More emphasis on conservation required	2 (5%)
Good balance	18 (47%)
More emphasis on use and access required	4 (10%)
Significantly more emphasis on use and access required	1 (3%)
No comment/didn't comment	12 (32%)

Table 3: Level of support for zoning

Support (%)	Don't support (%)	Would support if changes were made (%)	No comment / didn't comment (%)
27 (71)	2 (5)	3 (8)	6 (16)

The plan recommended that Walpole and Nornalup Inlets be declared a marine park. The other issue in this area was whether the town jetty and boat ramp should be included within the proposed marine park boundary. To ensure that individuals were aware of these issues and to determine community support for them, the submission form made specific reference to them. The majority of respondents (68%) supported the designation of a marine park (Table 4). The issue of whether town jetty and boat ramp should be included in the proposed marine park was fairly evenly split between those in favour 15 submissions and those against 16 submissions.

Table 4: Level of support for specific issues

Issue	Yes (%)	No (%)	No comment/ didn't comment (%)
Marine Park – appropriate reserve type?	26 (68)	6 (16)	6 (16)
Town jetty/boat ramp included in the marine park boundary?	15 (39)	16 (42)	7 (18)

The analysis of public submissions to the plan is presented in Table 5.

The analysis contains:

- a summary of each major issue or point raised and the number of submissions that raised the issue;
- an indication of whether or not the comment resulted in an amendment to the final management plan and the criteria by which each comment was assessed; and
- a brief statement responding to the comment and, if appropriate, indicating what action was taken to amend the final management plan.

Submissions were assessed entirely on the merit of points raised. No subjective weighting was given to any submission due to its origin or any other factor so as to elevate its importance above any other submission. The criteria used to assess whether a change would be made to the plan are outlined below and are also referenced in Table 5.

1. The 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 plan **was not amended** if a submission:
 - a) clearly supported the draft proposals;
 - b) offered a neutral statement or no change was sought;
 - c) addressed issues beyond the scope of the plan;
 - d) made points that were already in the plan or were considered during its preparation;

- e) was one amongst several widely divergent viewpoints received on the topic and the strategy of the plan was still considered the best option; or
- f) contributed options which are not possible (generally due to some aspect of existing legislation or Government policy).

Where submissions raised the same or related issues, these have been amalgamated where appropriate. It should be noted that minor editorial changes, (e.g. spelling mistakes, grammar and formatting) referred to in the submissions, have also been made to the plan.

Table 5: Summary of comments received in public submissions

No	Summary of issues / Major Points Raised	Amendment (criteria)	Discussion/Action
General comments			
1	<p>Supports the plan (8 submissions).</p> <p>In addition to providing the above statement, submissions made one or more of the following comments:</p> <ul style="list-style-type: none"> • Commended DEC/MPRA and the Focus Group for producing a well balanced plan (3 subs). • Pleased to see support for sustainable recreational fishing in the marine park (1 sub). • Our organisation looks forward to monitoring the progress of the marine park's all inclusive recreation zoning (1 sub). • Believes it is a well prepared document (1 sub). 	No (2a)	Support for the plan.
2	<p>Previous experience suggest that various DEC officers have objected to a range of development matters including plant species, wind generators, powerlines etc. (1 submission).</p>	No (2b)	No change sought.
3	<p>Please let it remain the same with all existing activities (boating, fishing, houseboats, access etc) still permitted (2 submissions).</p>	No (2d)	The plan maintains the previous levels of access to the inlets. Changes to the level or type of access during the life of the plan will only be in response to actual or potential declines in the marine park's ecological or social values which warrant a management response.
4	<p>Tourism WA's <i>Australia's South West Destination Development Strategy. An Action Plan Approach 2004 - 2014</i> identifies that nature-based and family experiences in the South West should be promoted and nurtured to increase our market share of visitors, to contribute to tourism experiences, and to keep tourism as one of the State's key economic drivers. Our organisation is pleased that the plan includes opportunities for nature-based tourism and remote experiences, control of development proposals, management of ecological and social values, the consideration of existing tourism operators and the recreational needs for people to experience a range of activities (e.g. recreational fishing, tours and holidays) on and around the inlets (1 submission).</p>	No (2a)	Support for the plan.

No	Summary of issues / Major Points Raised	Amendment (criteria)	Discussion/Action
2 Management context			
State policy context			
5	<p>The document makes no comment on strategic planning initiative/documents of the Western Australian Planning Commission, the Augusta-Walpole Coastal Planning Strategy or the Warren-Blackwood Rural Strategy apart from generic visitor and development interest. There is also no mention of planning undertaken by the Councils in the Shires of Manjimup and Denmark in terms of their respective local planning strategies and land use proposals for the areas surrounding the inlet (2 submissions).</p>	Yes (1c)	References to the Augusta-Walpole Coastal Planning Strategy, the Warren-Blackwood Rural Strategy and the local planning schemes of the Shires of Manjimup and Denmark have been added to Section 2 State Policy Context.
6	<p>The plan at present contains no reference to South Coast Natural Resource Management Incorporated (SCNRMI) or the South Coast Natural Resource Management Regional Strategy (NRM regional strategy). SCNRMI co-ordinates NRM management and funding in the region and although SCNRMI's boundary only extends as far as the inlets, the whole of the inlets' catchment is included in the former Water and Rivers Commission/Department of Environment's South Coast Region, and the waterways are therefore referred to in the NRM regional strategy. As this document, its investment plan, strategy and background papers provide significant information on the values, threats, management initiatives and future priorities for the inlets and its catchment it is a very important source of direction for NRM initiatives on the South Coast, as well as funding, and it should be referenced. In addition, the NRM regional strategy is presently being implemented and there are numerous initiatives that relate to the inlets that could be of great assistance in implementing the plan. Some of these projects, such as the use of 'southern incentives' to grant aid for coastal recreational works, research into fish populations and condition, increased monitoring of estuarine and river water quality and mapping of cultural values for south coast waterways. For example:</p> <ul style="list-style-type: none"> • The Deep River is classified as a 'Wild River' of state wide if not national importance. • The Frankland River is designated as having high economic, social and environmental values because of its high visual amenity and recreational values. • The Walpole River has significant values because it provides potable water supplies; the inlets themselves have high values because of their high visual amenity and medium social and economic values. These values are detailed in the NRM regional strategy's background paper No. 4. • Projects presently being funded through the NRM regional strategy include research by 	Yes (1e)	Additional references to the work undertaken by SCNRMI through the NRM regional strategy has been added to Section 2 State policy context and the water quality, sediment quality and sandy beaches and shoreline vegetation values in Section 7.1. Additional background text has also been added to the water quality section recognising the values of the river systems as described.

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7	<p>Murdoch University on the condition and abundance of fish stocks in 5 south coast estuaries (including Walpole/Nornalup).</p> <ul style="list-style-type: none"> Mapping of cultural values (both European and Indigenous) is also being undertaken, as is increased monitoring of estuarine water quality and condition, estuary and river action plans are being prepared and implemented. <p>(1 submission).</p> <p>We understand that the Walpole and Nornalup Inlets Systems Advisory Committee (WANISAC) has not been continued due to operational issues regarding a committee of the Shire of Manjimup under the requirements of the Local Government Act. So references to WANISAC for responsibility in implementing strategies is not current and community input is required for alternative possibly the Walpole-Nornalup & Districts Community Development Group or Friends of National Parks Inc. (1 submission).</p>	Yes (1e)	References to WANISAC for the implementation of strategies have been removed.
8	<p>There can be more mention and hence recognition of the links with the regional natural resource management strategies of South Coast Natural Resource Management Incorporated (SCNRMI) and South Coast Catchment Council (SWCC), both of which reference to and recognise the Walpole-Nornalup Inlets as a high value asset. To reflect the accredited published NRM strategies will require the additional noting of SWCC marine components. Currently the inlets are formally recognised as part of the SWCC region which follows the Shire of Manjimup boundaries. However, administrative boundaries aside, full coordination between SCNRMI and SWCC is via a proposed memorandum of understanding to ensure complimentary and consistent approach to the area. Section 10 Performance Assessment can include the links to resource condition monitoring and reporting that will be done by SCNRMI & SWCC regional NRM groups, particularly where there are projects have been implemented via investment plans (1 submission).</p>	Yes (1e)	Additional references to the work undertaken by SCNRMI through the NRM regional strategy has been added to Section 2 State policy context and the water quality, sediment quality and sandy beaches and shoreline vegetation values in Section 7.1.
Responsibilities of authorities and government agencies			
9	<p>Since preparation of the plan there have been changes in department names and responsibilities, and most importantly for this document in the formation of the DEC and Department of Water (DoW). Although DEC is referred to throughout the document, DoW is not mentioned and the description of DEC's responsibilities includes the functions of both departments. DoW needs to be included in the list of agencies on p5, and its role as the lead agency for water resource protection, allocation and management needs inclusion. It has a major role in water resource planning and protection, and waterways management, and this</p>	Yes (1e)	The plan has been updated to reflect the roles and responsibilities of the DoW.

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10	<p>includes estuary management on the South Coast. DoW also has an important role in terms of water quality monitoring, for both the inlet and its catchment, and can provide input on appropriate inlet resource condition indicators (1 submission).</p> <p>A properly managed marine park will assist the retention of Walpole's character and aid its marketability into the future which will be of an indirect benefit to the Shire of Manjimup. Concern is expressed that without State Government support and the allocation of additional resources for implementation and on-going management of the marine park the stated objectives will be difficult to achieve (1 submission).</p>	No (2d)	An assessment of the resources required to manage the marine park was undertaken as part of the Government's consideration of the proposal to create the marine park. The assessment included staff, equipment and operational funding to achieve the strategies outlined in the plan.
4 Regional perspective			
Hydrology			
11	The section on hydrology on p10 may need updating (1 submission).	Yes (1e)	This section has been reviewed and amended accordingly.
5 Definition of the area and reserve tenure			
General comments			
12	As the inlets are significantly influenced by the ocean channel, extending the marine park boundary to include the reefs, banks and ocean area that directly influences the channel will ensure any management is consistent with the inlets. Even though the national park is contiguous along the adjoining coast, by extending the marine park's ocean boundary it will ensure that if any active management is to occur will be done subject to the objectives of the marine park (1 submission).	No (2c)	The Government identified a study area in which the marine reserve could be planned and the main conservation feature was the estuarine environment. The adjacent marine environment was outside the scope of the planning process.
13	The marine park should be extended out to East Point and in a line 3-400 metres from the channel along Bellanger Beach. In the past professional fisherman have netted across the channel. The herring and whiting have been very few over the past 4-6 years. Blue manna crabs are now almost non-existent, in fact I did not see a crab in the last period I was at Walpole - mid December 2005 to mid March 2006, I suspect the increase in stingrays has depleted the crabs (1 submission).	No (2c)	The Government identified a study area in which the marine reserve could be planned and the main conservation feature was the estuarine environment. The adjacent marine environment was outside the scope of the planning process.
14	Very little activity, apart from transiting from the town jetty boat ramp to the Nornalup Inlet appears to occur on the Walpole Inlet. There may be a case to excise it from the marine park (1 submission).	No (2e)	The Walpole Inlet is part of the larger estuarine system and inclusion of the whole system within the marine park will enable a more effective management framework to

No	Summary of issues / Major Points Raised	Amendment (criteria)	Discussion/Action
			be applied.
Reserve type: submitters ticked “Yes” on the submission form			
15	Individuals/organisations supported that ‘marine park’ was the most appropriate reserve type but provided no additional comment (22 submissions).	No (2a)	Support for the plan.
16	Unfortunately, the Walpole community has been repeatedly ignored with its requests for the area not to be gazetted at all. Given that the area is to be gazetted, then the ‘marine park’ designation provides the most versatility for the current usage (1 submission).	No (2e)	The Government is committed to the development of a comprehensive, adequate and representative system of marine reserves, including the Walpole and Nornalup Inlets. Extensive consultation was undertaken in the area and the majority of people support the designation of a marine park.
17	This organisation is fully supportive of the proposal to create a marine park for these inlets given the high environmental and social values that are referred to in the plan (1 submission).	No (2a)	Support for the plan.
18	Providing that the laws set out at the present time are kept in place and not changed so as to directly ban fishing in the inlets to hand line fishing only (1 submission).	No (2a)	Support for the plan.
19	We don't mind it being a marine park as long as recreational boating, fishing, and skiing etc. are still allowed (1 submission).	No (2a)	Support for the plan.
Reserve type: submitters ticked “No” on the submission form			
20	Individuals/organisations did not support the designation of a marine park but provided no additional comment (1 submission).	No (2e)	No change sought.
21	Perhaps you would look into spreading the interest into adjacent inlets and buying fishing licences back off professionals to even the load on fish species e.g. Denmark (Sewer) Inlet (1 submission).	No (2c)	The Government identified a study area in which the marine reserve could be planned, which did not include adjacent inlets. The purchase of professional fishing licences is managed by the Department of Fisheries (DoF) and is beyond the scope the plan.
22	A possible reduction in boat size and motor horsepower allowed on the inlets and rivers.	No (2e)	Only parts of the inlets are subject to vessel and speed

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23	Consider changing the 8 and 5 knot speed limits to a maximum 18 knots where safe so boats may travel on the plane, thereby reducing the wake produced by the boat (1 submission) .		restrictions. The Department for Planning and Infrastructure (DPI) are the primary agency responsible for maritime safety and the speed limits designated in the inlets and rivers are based on their expert knowledge.
23	Designated areas for activities such as recreational boating/canoeing, swimming and recreational fishing (1 submission) .	Yes (1e)	A swimming area has been designated at Coalmine Beach. The plan contains its strategies that specify designating areas for specific activities should the need arise in future.
24	Removal of mining/exploration/production (1 submission) .	Yes (1e)	The activities table has removed mining as permissible activities to clarify Government's intention, since commercial extraction is not compatible with a recreation zone.
25	Why change something that is still as pristine now as it was 40 years ago. Salinity problems from the upper Frankland may be of concern in the future, but leave the inlets as they are (1 submission) .	No (2e)	Designation of the inlets as a marine park and implementation of the plan will help to ensure that the marine park is managed in a manner to protect the ecological and social values of the area. Anecdotal evidence suggests that there have been declines in some species.
Town jetty/boat ramp: submitters ticked "include in park boundary" on the submission form			
26	Individuals/organisations supported inclusion but provided no additional comment (7 submissions) .	No (2a)	Support for the plan.
27	Our organisation supports the inclusion of the jetty into the marine park as: <ul style="list-style-type: none"> • It simplifies the marine park boundaries. • Provides a consistent approach with most other jetties in the marine park. • Whilst the Shire does have a bridge crew, they are not really in the business of maintaining jetties. • Fears that DEC will be heavy handed in restricting access to and use of the jetty may be unwarranted, and in any event DEC could restrict undesired activities on the inlet once users leave the jetty area. • Liability risk, inspection regimes and policing may be better undertaken by DEC who 	No (2a)	Support for the plan.

No	Summary of issues / Major Points Raised	Amendment (criteria)	Discussion/Action
28	<p>appear to have greater access to resources that this organisation. However this is provided that reasonable provision is made to commercial users, particularly the existing operators who have operated for many years without any significant issues arising (1 submission).</p> <p>The site will be a major entry point to the marine park and DEC should have management control of all major access points to the marine park. The town jetty and boat ramp area is the base for most light industry based on the inlets. This area is used for refuelling boats and discharging sewage into onshore tanks and so represents an area of potential pollutant discharge into the marine park. As any pollutant spill in this confined area would rapidly enter the marine park, involving several management agencies in managing such a small area would be detrimental to management. This area needs to be managed by the same agency that manages the marine park. In addition, aesthetics and 'wilderness' values were recognised as highly important in this marine park during the planning process. Developments in the town jetty and boat ramp area could significantly impact on the visual landscape of the Walpole Inlet, so this area should not be managed differently than the rest of the marine park (1 submission).</p>	No (2a)	Support for the plan.
29	<p>If the town jetty area is excluded from the marine park, then the proprietors or lessees of the Rest Point jetty, the Swarbrick jetty and the Yacht Club jetty could also argue this point and apply for exclusion of their respective jetty locations from the marine park. If the town jetty area is included in the marine park then DEC would have jurisdiction over the area and could inspect outgoing and incoming fishing boats and pleasure craft, it could anchor its patrol boat at the jetty as a visible reminder of DEC's presence, it could carry out marine park research from the jetty area and it could erect information shelters and signage within that area. The DEC also has permanent personnel based in Walpole to facilitate on-ground management whereas the Shire of Manjimup is less capable of taking care of the statutory requirements in relation to the marine park. If deemed appropriate, the town jetty area could be designated a General Use Zone, which would allow for improvement or extension of the present facilities (1 submission).</p>	No (2a)	Support for the plan.
30	<p>There is a need to accommodate the interests of business proprietors of the town jetty area, which generally could be summarised as being long-term security over presently established infrastructure such as a private dwelling, house boat anchorages and slipway facilities, as well as the tourist boat business. Long-term security for those business proprietors should be provided in the plan in the form of 21-year conditional leases, similar to the Walpole Yacht</p>	No (2e)	Leases are not required for the commercial operator jetties in the town jetty area as the existing commercial operators have private jetties licensed by DPI and the operators would continue to own and be responsible for the management and upkeep of their jetties.

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	Club for its long-term lease arrangements over its clubhouse and adjacent shore (1 submission).		
31	Having isolated areas would be confusing (1 submission).	No (2a)	Support for the plan.
32	Jetties should be zoned in a number of places through out the inlets (1 submission).	No (2e)	Specific zones for jetties were not deemed necessary by the Focus Group or the MPRA.
33	I prefer the jetty to be in the marine park as it will stop any commercial interest happening there (1 submission).	No (2a)	Support for the plan.
34	As the main purpose of the jetty is to access the inlets it would be consistent if the same management regime exists throughout the inlet. Particularly as the jetties can be a focus if any inappropriate cleaning of caught fish or 'feeding' of wildlife occurs (1 submission).	No (2a)	Support for the plan.
Town jetty/boat ramp: submitters ticked "don't include in park boundary" on the submission form			
35	Individuals/organisations didn't support inclusion but provided no additional comment (4 submissions).	No (2e)	The town jetty and boat ramp area has been included in the marine park to better facilitate management of the marine park.
36	Local residents that have dogs and if they wish to swim and exercise them will be forced to find alternate venues and being an aging population the distance that has to be travelled will be of concern (1 submission).	Yes (1b)	A strategy to gazette dog-permitted areas where appropriate has been added to the plan to facilitate this use of the marine park.
37	The objective of providing a service to ratepayers and visitors is better vested in a local government authority, which is answerable to its ratepayers rather than DEC which is not accountable to the same degree (1 submission).	No (2e)	Provision of visitor facilities that enhances visitor enjoyment is a management objective of the plan and the maintenance of the town jetty and boat ramp part of this objective.
38	I feel the management of the jetty/boat ramp area is best administered by the local community and Manjimup Shire. Including it in the marine park would inhibit future modification/expansion (1 submission).	No (2e)	Future modification or expansion of the jetty/boat ramp is permitted, subject to environmental impact assessment.
39	If the area is excluded then there is concern that the existing operators who use the jetty would not receive any compensation for the improvements they have made to the jetty and	No (2e)	The existing commercial operators have private jetties licensed by DPI and the operators would continue to own

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	<p>they would not have the ability to assist in the management of the jetty. If ownership remains with the Shire of Manjimup they would have a seamless line of responsibility for the care and control of the jetty and surrounding infrastructure such as roads, lighting, etc. This approach would also ensure that the Shire will continue to have sole control of the staging, quality and frequency of works for the jetty and boat ramp (1 submission).</p>		<p>and be responsible for the management and upkeep of their jetties. Regarding the town jetty, DEC have a responsibility to ensure that visitor risk is minimised in the marine park, this includes ensuring that the maintenance works for the jetty and boat ramp are conducted as often as required to maintain visitor safety.</p>
40	<p>Should be under the care and maintenance of Manjimup Shire Council. Before long some thought will have to be given to providing another ramp as the Coalmine Beach ramp is a disaster area in a strong south west wind (1 submission).</p>	No (2e)	<p>The town jetty and boat ramp area has been included in the marine park to better facilitate management of the marine park. The provision of additional boat launching facilities will be assessed throughout the life of the plan.</p>
41	<p>It should remain excluded as it provides a greater flexibility for management and greater security for recreational boat users (1 submission).</p>	No (2e)	<p>The town jetty and boat ramp area has been included in the marine park to better facilitate management of the marine park. Provision of visitor facilities that enhances visitor enjoyment is a management objective of the plan and the maintenance of the town jetty and boat ramp assist in achieving this objective.</p>
42	<p>Don't include as the commercial operator would lose control of the jetties, which are essential for their business and that they built to proper specifications and paid for. We understand if they are under the control of DEC there will be no compensation and DEC will have control over their usage (1 submission).</p>	No (2e)	<p>The existing commercial operators have private jetties licensed by DPI and the operators would continue to own and be responsible for the management and upkeep of their jetties. DEC involvement in the use of and management of private jetties would include issues such expansions or modifications that could impact on the ecological or social values of the marine park.</p>
43	<p>The CALM Act would be too restrictive for boat owners and tourism operators (1 submission).</p>	No (2e)	<p>Restrictions enforced through the CALM Act would be to ensure that the ecological and social values of the marine park are maintained.</p>
44	<p>The foreshore area and the various jetties should remain the responsibility of the Shire of Manjimup and the existing commercial operators for care and maintenance. They have honoured their responsibilities thus far and deserve to have control over our infrastructure (1 submission).</p>	No (2e)	<p>The existing commercial operators have private jetties licensed by DPI and the operators would continue to own and be responsible for the management and upkeep of their jetties. The foreshore areas remain the responsibility of the Shire of Manjimup.</p>

No	Summary of issues / Major Points Raised	Amendment (criteria)	Discussion/Action
45	<p>The Focus Group workshops clearly document that this group signed off on the exclusion of the main town jetty facilities with a majority voting for it not to be included. This should never have been a question for public comment. There has never been any explanatory information provided to the general public of Western Australia as to the pros and cons of inclusion or exclusion (i.e. The 'Have your say' sheet does not indicate the impact on including a private jetty and wharf facilities within the marine park). DEC and the Government have been negligent by not providing clear information to the general public as to the impacts that this decision may have on the local community. The debate regarding inclusion or exclusion has been raised by both the local shire and DEC and revolves primarily around funding for the ongoing maintenance of the public jetty facilities. The discussion about the public jetty facilities should be discussed between these bodies and funding arrangements for maintenance decided on. The other jetty facilities should be excluded from the marine park. There are already ample regulatory controls for private facilities provided by DPI (1 submission).</p>	No (2e)	<p>The MPRA believed that further public consultation should be sought on the matter and requested that two options be part of the indicative management plan that went out for public comment. From DEC's perspective, funding is not the only issue regarding the inclusion of the jetty area in the marine park. Inclusion would allow a seamless approach to management to be applied to the marine park by providing a suitable focus point for welcoming visitors to the marine park and providing relevant information. In addition it would provide the ability to manage activities while protecting the marine park's ecological and social values.</p>
46	<p>Our organisation's dealings with the Shire of Manjimup for recreational boating facilities purposes have been positive. The Coalmine Beach boat launching facility may need consideration (similar to the Walpole Jetty exclusion zone) (1 submission).</p>	No (2e)	<p>The town jetty and boat ramp area has been included in the marine park to better facilitate management of the marine park. Excluding the Coalmine Beach boat launching facility was not deemed necessary as maintenance works can still be carried out.</p>
47	<p>During the deliberations of the Focus Group it was decided that the town jetty and boat ramp area should be excluded from the proposed marine park. The Focus Group were advised that sites of existing and possible future infrastructure have, in the past, been excluded from the boundary of some marine conservation reserves to simplify management and ongoing maintenance and improvement of facilities. Nothing has changed except DEC has indicated that if it is to manage the proposed marine park it wants the jetties included in the proposed boundary. Views expressed at the 4th Focus Group meeting on this issue included:</p> <ul style="list-style-type: none"> • Exclusion of this area from the proposed marine park would simplify future management of this high-use area; • This area should be included in the proposed marine park as it represents a major access point; • This area has conservation value and should not be managed differently to other parts of the inlet system; 	No (2e)	<p>The town jetty and boat ramp area has been included in the marine park to better facilitate management of the marine park. The MPRA considered the feedback from the Focus Group but, on balance, felt that there were more management advantages to including the town jetty. This advice was supported by Government.</p>

No	Summary of issues / Major Points Raised	Amendment (criteria)	Discussion/Action
	<ul style="list-style-type: none"> Why should jetties and facilities in this area be managed differently to other public and private structures in the proposed marine park? Eleven focus group members voted not to include this area in the proposed marine park, three voted to include the area in the proposed marine park, and four members abstained from voting. <p>The focus group was appointed with the approval of the Minister and was formed to represent the Walpole Community. Please listen to the Walpole Community (1 submission).</p>		
Town jetty/boat ramp: submitters didn't indicate the option they supported on the submission form			
48	I don't understand this question, why should the jetty be included or excluded? What is the advantage or disadvantage (1 submission)!!	No (2b)	No change sought.
7.1.1 Zoning for the proposed marine park			
General comments			
49	The decision to zone the entire marine park a recreation zone was not taken lightly by the Focus Group. The decision reflects the important historical and social values of the Walpole and Nornalup Inlets. The recreational zoning also reflects the vision of the Focus Group to achieve biodiversity conservation values with minimal impact on the highly valued recreational activities. This organisation believes the Walpole and Nornalup Inlets Marine Park will serve as an example of how recreational fishing can coexist with biodiversity conservation. The challenge henceforth is to effectively manage the permitted recreational activities via the many marine natural resource management processes (1 submission).	No (2a)	Support for the plan.
50	It is necessary to do whatever possible within the power of legislation to conserve and protect every aspect of this stunning part of the world. I hope the plan is able to achieve the utmost protection of the area (1 submission).	No (2a)	Support for the plan.
51	The plan should stipulate that any new applications for licenses of any kind, any development proposals and any changes to the zoning of the marine park, i.e. the introduction of sanctuary, special purpose or general use zones, be subject to a formal public consultation process (1 submission).	No (2d)	Applications for licences and development proposals that have the potential to affect the marine park are subject to the assessment requirements under the CALM Act and/or EP Act. These acts determine the level of public consultation required. The CALM Act already specifies that changes to the zoning scheme require a formal public

No	Summary of issues / Major Points Raised	Amendment (criteria)	Discussion/Action
			consultation process.
Submitters ticked “support” on the submission form			
52	Individuals/organisations supported the zoning but provided no additional comment (15 submissions).	No (2a)	Support for the plan.
53	Individuals/organisations supported zoning the entire proposed marine park as recreation zone (4 submissions). In addition to providing the above statement, submissions made one or more of the following comments: <ul style="list-style-type: none"> • The rationale for the zoning is sound (1 sub). • What a fantastic and balanced outcome. The zoning recognises the significance of tourism and recreation as major activities in the area while still protecting marine and estuarine biodiversity (2 subs). • Locals must travel long distances to access the very limited areas for their water activities, so don't want to loose ones we have (1 sub). 	No (2a)	Support for the plan.
54	On the basis that motorised jet skis can be used in the marine park, particularly for access to the mouth across the inlet (2 submissions).	No (2d)	Motorised jet skis are allowed and subject to the same provisions as other vessels within the marine park.
55	As noted by the Focus Group, should any significant spawning or hatchery areas are disturbed or influenced by fishing then an appropriate response should be implemented, like seasonal sanctuary zones (1 submissions).	No (2d)	The plan contains strategies that specify changing management controls if required. In addition, should additional protection measures be required, DoF can implement additional restrictions, such as seasonal closures, at any time. The plan can also be amended within the 10 year period through formal public consultation.
56	I fully support sustainable fishing and I am rigorous in complying with size and bag limits. During visits over the last 15 years, I have never encountered a fisheries officer. I am concerned that undersize fish are taken regularly by others and would urge regular policing by DoF which should include an education component. I only have anecdotal evidence, but often while I am returning undersize fish, which is usually a large percentage, I see others fishing similar areas returning nothing (1 submission).	No (2d)	Patrol and enforcement strategies (section 7.4) in the plan discuss staffing and policing. An assessment of the resources required to manage the marine park must be approved by Government prior to its creation. In addition, education strategies and programs will be implemented to ensure users are aware of best practice information.

No	Summary of issues / Major Points Raised	Amendment (criteria)	Discussion/Action
57	I would like to maintain that no sanctuary zones be implemented in the future, as discussed at the focus group meetings (1 submission).	No (2e)	Sanctuary zones would only be implemented during the life of the plan if current or potential declines in the marine park's ecological values warranted a management response. This position was supported by the Focus Group.
58	There are fears that the DEC has proposed the Recreation Zone merely to deflect current public concerns with the intention of later changing the zone in order to restrict certain uses of the marine park. Public consultation should be undertaken before any rezoning takes place (1 submission).	No (2d)	The CALM Act specifies that changes to the zoning scheme require a formal public consultation process.
59	We are against any further geographical zoning within this inlet system. It is not required from any current scientific basis and the inlet system is too small for it to be manageable from a recreational usage viewpoint. In addition, the current demands on the inlet system are minimal and are not reasonably expected to increase to any significant level within the life of the plan (2 submissions).	No (2d)	The marine park is zoned a Recreation Zone in its entirety. Sanctuary zones would only be implemented during the life of the plan if current or potential declines in the marine park's ecological values warranted a management response. This position was supported by the Focus Group.
Submitters ticked "would support if slight changes were made" on the submission form			
60	Excessively noisy activities such as waterskiing and jet skis conflict with the aesthetic values and the wellbeing of waterbirds. These activities should not be permitted (1 submission).	No (2d)	The use of jet skis for transiting is permitted in the same way that regular vessels are, however in recognition of the potential impact that freestyle jetskiing could have, this activity will be monitored to ensure that the marine park's ecological and social values are not impacted. With regards to water skiing, the Focus Group and the MPRA felt that this activity has a valid and historical use and the plan now contains a strategy to gazette a water ski area in Nornalup Inlet, however this is subject to environmental impact assessment and in consultation with users.
61	There needs to be more activity by DoF fisheries inspectors (2 submissions). In addition to providing the above statement, submissions made one or more of the following comments: <ul style="list-style-type: none"> • Monitoring of size and catch limits/reduce bag limits (1 sub). 	No (2d)	Patrol and enforcement strategies (section 7.4) in the plan discuss staffing and policing. An assessment of the resources required to manage the reserves must be considered by Government prior to their creation. Section

No	Summary of issues / Major Points Raised	Amendment (criteria)	Discussion/Action
			7.7 and 9.1.6 discuss monitoring of finfish populations and DoF could in the future further reduce bag limits, or apply other controls, should the need arise.
Submitters ticked “don’t support” on the submission form			
62	Individuals/organisations didn’t support the zoning but provided no additional comment (1 submission).	No (2b)	No change sought.
63	Recreational use will spoil the area (1 submission).	No (2e)	Removing recreational activities would be inconsistent with the statutory purpose of marine parks; they are intended to provide for recreational and other uses consistent with the primary conservation objective and the Government’s multiple-use policy.
7.2 Education and interpretation			
64	The vital first step in protecting the natural environment of the marine park is to raise the level of awareness amongst users. The town jetty area is the gateway to the marine park and offers the golden opportunity to introduce the marine park to locals and visitors alike, hoping that they will gain a heightened awareness of the beauty and values of our estuaries and also to encourage them to act responsibly when engaging in recreational activities and other pursuits. Educational and interpretive material could be displayed there, and a sign be put up with the words ‘Welcome To The Walpole - Nornalup Marine Park’ (1 submission).	No (2d)	The development and implementation of an education and interpretation program is a key strategy in the plan, and signage and education materials will be prepared to ensure users are aware of the importance of the marine park and methods to act responsibly.
7.4 Patrol and enforcement			
65	This organisation supports DEC being the controlling authority subject to the State Government providing DEC with sufficient resources necessary for on water patrol and enforcement (1 submission).	No (2a)	An assessment of the resources required to manage the marine park must be approved by Government prior to its creation.
7.5 Management intervention and visitor infrastructure			
66	It should be noted that public access exists to the foreshore at Rest Point. The plan should make provision for future public access needs likely to result from future community growth. In particular, anticipated future development near Clarke Road will create pressures to access the foreshore in that proximity and it would seem prudent to manage those	Yes (1e)	Additional text has been added in Section 8 regarding public access. The plan does not prohibit the provision of additional public access points. The provision of future access points will be assessed based on adequacy of

No	Summary of issues / Major Points Raised	Amendment (criteria)	Discussion/Action
67	<p>pressures rather than wistfully prohibiting access (1 submission).</p> <p>The comments in the plan in this section are vague and need to consider the impacts on the areas immediately adjoining the marine park (i.e. parking, rubbish, fish cleaning, effluent disposal etc) and make tangible commitments towards addressing those impacts (1 submission).</p>	No (2e)	<p>existing access and the potential impacts on the marine park's ecological and social values.</p> <p>The plan provides a broad framework as well as detailed strategies to guide management for the next 10 years. Specific actions to address specific issues will be developed as part of the Frankland District's annual work plans.</p>
8 Development proposals within the proposed marine park			
68	<p>Currently there are unauthorised moorings (star pickets) at Coalmine Beach adjacent to the swimming area. These should remain as is (except that the users should be required to remove their peg at the end of the stay). The area is dangerous to swimmers as the reef protrudes in places. All existing star picket moorings should be removed (and the broken remnants also). 'Bring your own picket and take it home with you'. Additionally, the Coalmine Beach yacht club jetty (currently dismantled) should be rebuilt to accommodate young anglers, boat access and other passive recreational activities (1 submission).</p>	No (2d)	<p>Uncontrolled moorings can restrict access to locations and impact the marine park's ecological and social values. Star pickets are not an appropriate type of mooring to be used. DEC is currently sourcing funding for the rebuilding of the Coalmine Beach yacht club jetty.</p>
69	<p>The inlets are nearly the same as they were 1000 years ago. Let's keep all buildings and such away from the inlet's foreshores (1 submission).</p>	No (2c)	<p>Although the majority of the land surrounding the inlets is national park, some is vested with the Shire of Manjimup and is managed through their local planning schemes. Developments on land vested with the Shire are beyond the scope of the plan.</p>
70	<p>A boat launching facility (sheltered structure) is a must at Coalmine Beach. At present there is erosion of the foreshore from high volumes of traffic from the town jetty, which will only get worse (1 submission).</p>	No (2d)	<p>The provision of future access points will be assessed based on adequacy of existing access and the potential impacts on the marine park's ecological and social values.</p>
71	<p>There have been a number of jetties established in this area and enquiries about developing more jetties. The plan prohibits the construction of new jetties (page 28). It is suggested that a review of existing structures also be undertaken to assess the legal status of these structures and to provide recommendations on their continued existence. Such reviews have been undertaken by the DPI in other south coast estuaries. Any decisions on removal of structures would be taken by the management committee overseeing the plan's implementation (1 submission).</p>	Yes (2d)	<p>The construction of new jetties would required referral to DEC and MPRA and would only be prohibited where there is an unacceptable impact on the marine park's ecological values or it is incompatible with the objective of the marine park. Section 7.7 Management intervention and visitor infrastructure contains strategies specifying the implementation of routine inspections, maintenance and reporting on infrastructure conditions. This strategy</p>

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72	<p>Concern is expressed that the plan fails to provide sufficient certainty to the incumbent house boat operators who have been operating under licence in the Walpole and Nornalup Inlets for many years without any identified detrimental effect, and also fails to address the off water servicing issues necessary for any new business to operate should additional licences be issued (for example, how and where would a new business deal with effluent, jetty space, servicing, storage, access, fuel etc). Where an existing licence holder has operated without breach of licence, they should be offered first right of refusal to an extension of such licence. Prior to the issue of additional licences, DEC should address all relevant off site servicing needs including legitimate locations to carry out such activities (1 submission).</p>	No (2d)	<p>would identify the structures and their status within the marine park.</p> <p>The declaration of a marine park does not change to security of tenure of commercial tour operator licences. Should additional operators wish to operate on the inlet, part of their application will need to address issues such as effluent management, jetty space, servicing, access etc as these issues are the responsibility of the licensee.</p>
73	<p>Concern is expressed at the restrictive policy to foreshore access. The nexus with the Walpole Wilderness Area to limit foreshore access to the marine park is considered tenuous at best. It is anticipated that with greater interest shown in Walpole and promotion of the marine park, greater demand will result for access to the marine park and also the foreshore. Existing public access to the foreshore should therefore be protected and a commitment made to enhance infrastructure (1 submission).</p>	No (2d)	<p>Provision of visitor facilities that enhances visitor enjoyment is a management objective of the plan and the provision of future access points will be assessed based on adequacy of existing access and the potential impacts on the marine park's ecological and social values.</p>
74	<p>General support is given to the proposed buffer areas adjoining the marine park although greater clarity is required for permitted and not permitted activities within these buffers (1 submission).</p>	No (2b)	<p>There are no buffers proposed for the marine park.</p>
75	<p>Concern is raised about the exclusive ownership of moorings, which has proved to be problematic in other areas in the State (such as Rottenest Island). Exclusive ownership tends to result in:</p> <ul style="list-style-type: none"> • Low utilisation of a scarce resource (if there are 11 moorings but only 4 boats then utilisation at peak times is less than 50%). • Excessive number of moorings being laid to cater for various wind/weather scenarios. • Exclusion to the general public of prime mooring locations (as these tend to be sites where permanent moorings are located). Even if the mooring is not being used at the time the presence of the mooring diminishes the availability of space. • High enforcement cost to ensure moorings are only used by owners. • Moorings should not be exclusive or privately owned, but rather owned and managed 	No (2d)	<p>The plan states that a mooring plan will be developed for the marine park. This plan will identify locations in the marine park where moorings will be permitted and the capacities for these areas. This will include an assessment of mooring requirements and whether public moorings should be installed.</p>

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76	<p>by DEC and their use licensed to operators and casual users to ensure maximum possible utilisation. (1 submission)</p> <p>By choosing to blame the recreational angler for all the problems of fish species and the inlet, DEC has ignored the impact of future housing developments. A development that will double the town's population, placed on the banks of the Frankland River, or an extension of a previous land development on the Walpole Inlet marsh ground are not mentioned in the plan, yet their impact on the water and the biodiversity of the fauna are immense. There are also plans by Water Corporation to pump treated sewerage into the inlet, an option that they consider to be the best solution for the town's waste because it is the cheapest. No where in the plan are the potential damage to unique biodiversities and ecosystems within the Walpole and Nornalup Inlet mentioned. The effects of this will be devastating in particular on the resident stingray population that are the vacuum cleaners of the inlet, yet according to the plan the recreational angler is their biggest threat (1 submission).</p>	No (2d)	All development proposals that have the potential to impact the marine park will be formally assessed by the EPA and DEC/MPRA, considering this plan and the requirements under the EP Act.
9 Management of ecological and social values			
77	<p>The desired trends listed as 'constant' for many of the ecological values in the plan are unrealistic and inappropriate for a highly dynamic estuarine system like the Walpole and Nornalup Inlets. Having a management expectation that values will remain constant fails to accommodate both the large ecological changes that occur in response to the annual hydrological cycle and the long-term consequences of sporadic large events like floods. Ecological impacts associated with flood events, for example, may persist for decades. This system is also likely to undergo significant ecological changes in coming decades in response to the pattern of diminishing rainfall in the south west of WA. For example, changes to the inlet/ocean exchange due to silting of the entrance channel could have significant ecological impacts that result in changes to key values. For these reasons, this marine park will be highly ecologically variable compared to nearly all other marine reserves in WA, and these factors will need to be recognised in managing the system. Importantly, monitoring will need to identify these major natural patterns of ecological variation and long-term trends associated with change. Hence, the 'desired trends' for values like macroalgae and seagrass, benthic invertebrates, finfishes, sharks and rays and birds should not be 'Constant' as stated in the plan. Constant has little meaning in a highly variable system. I would suggest something like 'Consistent with patterns of natural variation' would be more realistic (1 submission).</p>	No (2d)	In determining baselines and trends for the ecological values of the marine park, DEC will consider the natural variability that is inherent in the system. This is the case for all marine parks where specific ecological values have a high degree of natural variability.

No	Summary of issues / Major Points Raised	Amendment (criteria)	Discussion/Action
9.1 Ecological values			
78	<p>The plan is extremely focussed on the inlets and no mention is made of their catchments. Given the fact many of the inlets' listed environmental values (e.g. seagrass, sediment quality, water quality) and social values relate to catchment inputs there would be value in including actions addressing these catchment inputs. Actions relating to the need to survey and protect riparian vegetation for the rivers entering the inlets would recognise and give additional support for catchment landcare work. It would also give it a focus that has been arguably lacking to date. The actions relating to the catchment would be undertaken by catchment groups, landowners and agencies such as DEC, who together could assist in the wording of actions. The inclusion of such actions would promote a more integrated approach to catchment management (1 submission).</p>	Yes (1d)	<p>Additional references to regional and local catchment groups have been added to the plan. In addition strategies that task DEC to work with adjacent land managers and others to minimise catchment and urban-based inputs that could affect the marine park's ecological or social values has also been included.</p>
9.1.1 Geomorphology			
79	<p>The stabilising marram grasses on the sandbar at the entrance may well influence the scouring effects of winter storms but anecdotal comment suggests that after the demolition of the reef in front of the entrance passage (by explosives) the flow patterns changed and the channel depth reduced thereafter (1 submission).</p>	No (2b)	No change sought.
80	<p>A number of changes to the geomorphology objectives, strategies and long term targets could be made to improve them:</p> <ul style="list-style-type: none"> • objective 1 – include ‘and processes’ after ‘structural complexity’. • objective 2 – include ‘understand impact of previous activities and’ before ‘facilitate long-term management’. • strategy 5 – include “including assessment of any reef or other stable bars that have been disturbed or altered in or near ocean channel outlet.” Given there the water flow regime (yields & duration) would have changed with changes in land uses in the catchments. • long-term target – change ‘significant’ to ‘negative’ for the level of change accepted (1 submission). 	Yes (1e)	Amendments made to text.
81	<p>The 2nd management strategy refers to development in part but sediment and water quality strategies require liaison with adjoining areas (1 submission).</p>	Yes (1e)	<p>Additional text has been added to the water and sediment quality sections relating to liaison with adjacent land managers.</p>

No	Summary of issues / Major Points Raised	Amendment (criteria)	Discussion/Action
82	The reference on page 30 (strategy 3) to local government is unclear and the conditions associated with the proposed shoreline buffer are not defined. The proposed buffer needs to reflect and consider the causes of erosion, weed infestations and drainage discharge. The proposed 50-100m buffer area should enunciate what is or is not to occur within this buffer, particularly when management control of the area is vested with an authority other than DEC. Acknowledgement needs to be made of any pre-existing shoreline ailments and reasonable consideration be given to the resources available by the various management authorities to address those conditions. Should the DEC wish to rehabilitate shoreline erosion (resulting from on-water use) then resource contributions towards such works should also be anticipated (1 submission).	No (2d)	The plan makes no mention of a proposed buffer. However, if a degraded area is identified then an assessment of the viability of and the resources required to undertake the rehabilitation will be made. Should rehabilitation be deemed appropriate then resources will be made available.
9.1.2 Sediment quality (KPI)			
83	These strategies fundamentally require the support of the Shires of Manjimup and Denmark as these agencies are responsible for the management of runoff, containment of pollutants and any increase in the size of the buffer adjacent to townsites or future development sites (1 submission).	Yes (1e)	The plan contains a re-worded strategy to work with adjacent land managers and other relevant groups to minimise potential impacts.
9.1.3 Water quality (KPI)			
84	The plan states that the 'Township' is the biggest threat to water quality, however from a health perspective, the biggest threat to water quality is not the township but rather water sewerage treatment and farm runoff. The plan fails to acknowledge the townsites existence prior to the establishment of the marine park and the water quality issue with run-off is pre-existing. Appropriate drainage controls should be determined and appropriate time frames and funding sources identified to improve core infrastructure addressing water quality. Improvements to core infrastructure (such as treatment of stormwater drainage) would cost multi-millions of dollars and are beyond the financial capacity of the local authority to implement. Whilst this organisation supports the overall thrust to protect water quality in these key waterways, these goals need to balance these objectives against the capacity of local government to achieve the objectives (1 submission).	Yes (1e)	The plan does not state that the 'Township' is the biggest threat to water quality, rather it lists it as one of the potential sources of contaminants. The plan does list agriculture run-off as another potential source of contaminants. The plan contains a re-worded strategy to work with adjacent land managers and other relevant groups to minimise any potential impacts.
85	Many of the values detailed in the plan relate to water quality and there is mention of catchment sources, for example of nutrients. However, although the plan highlights the value of integrating management of the marine park with the Walpole-Nornalup National Park, there is no promotion of integrated management across the catchment generally.	Yes (1e)	In recognition of the need to integrate management to reduce the impacts of catchment-based sources of e.g. nutrients, the plan contains a re-worded strategy to work with adjacent land managers and other relevant groups to

No	Summary of issues / Major Points Raised	Amendment (criteria)	Discussion/Action
	<p>Strategies relating to nutrient management are limited to monitoring within the inlets, and no strategies relate to reduction of nutrient inputs from the catchment (whether urban or rural). It is suggested that a strategy be included relating to auditing the water quality entering the inlets and to support measures aimed at investigating and reducing the quantity of sediment, nutrients and other pollutants in partnership with the community. The DoW needs inclusion in this section. The inclusion of such strategies provides linkages with catchment work that could be undertaken by catchment groups utilising funding from the NRM regional strategy. Without such linkages this catchment work is not promoted as a priority (1 submission).</p>		<p>minimise potential impacts. DoW has been included as an agency for implementation.</p>
86	<p>Major pressures – the statement of none seems to contradict the background notes regarding nutrients in the Walpole Inlet (1 submission).</p>	No (2e)	<p>The category ‘major pressure’ is meant to reflect the activity that is significantly affecting the specific value. Information at hand does suggest that although there are a number of pressures affecting water quality, at present none is significantly affecting the marine park’s water quality. Determining base-lines and undertaking monitoring will allow DEC to determine if one of the listed pressures does begin to significantly affect water quality.</p>
87	<p>Add a short term target – ‘Audit of possible sources and risk assessment with options to manage’ (1 submission).</p>	No (2e)	<p>This is a strategy not a target and would be covered by strategy 4, collaborate to minimise catchment and urban-based inputs that affect the marine park’s water quality.</p>
88	<p>Strict control of fertiliser application to house lawns etc. (1 submission).</p>	No (2c)	<p>This issue is beyond the scope of the plan. However the plan now contains a strategy to collaborate with adjacent land managers and other groups to minimise catch and urban based inputs into the marine park.</p>
89	<p>Strategy 6 – include ‘and buffer’ after the ‘capacity to mitigate’. Also add suggest adding the following organisations – local Government and NRM groups. We also suggest that the strategy should be a high priority with steps; audit, design, costing, program in order to implement as per resources (1 submission).</p>	Yes (1e)	<p>This strategy has been separated into two components. The first is covered by strategy 4, collaborate to minimise catchment and urban-based inputs that affect the marine park’s water quality. The second component regarding mitigating spills is part of the general risk assessment process and is addressed by the generic strategies in Section 7.5.</p>

No	Summary of issues / Major Points Raised	Amendment (criteria)	Discussion/Action
90	<p>A number of changes to the water quality background, current pressures, strategies and short term targets could be made to improve them:</p> <ul style="list-style-type: none"> In the background section – there is no reference to the Landcare works coordinated by the Walpole-Tingledale LCDC and SCNRMI funded Southern Incentives support. This included surveys of riverine areas and some fencing for regeneration and revegetation along the waterways. Add an additional strategy ‘asses the impact of septic systems in the townsites, particularly Walpole, by estimating possible nutrient and/or organic input and refer to other studies done. Where possible establish indicative monitoring to quantify inputs’. <p>(1 submission).</p>	Yes (1e)	Additional references to regional and local catchment groups and works undertaken have been added to the plan. In addition strategies that task DEC to work with adjacent land managers and other relevant groups to minimise catchment and urban-based inputs that could affect the marine park’s values have also been included. Assessing the impact of septic systems would also be covered under these strategies.
9.1.6 Finfishes (KPI)			
91	Walpole and Nornalup Inlets should have there own bag limits and size limits for fishing, which can be reviewed over a certain time (1 submission) .	No (2c)	Determining bag and size limits for fish species is the responsibility of DoF and is beyond the scope of the plan.
92	<p>There a two errors in the finfishes section:</p> <ul style="list-style-type: none"> ‘Thirty six species of larval fish have been recorded.....’ this does not make sense as larval fish are not species. This should read as ‘The larvae of thirty six species of fish have been recorded...’ the Australian anchovy is <i>Engraulis australis</i>, not <i>Engraulus</i>, as is stated. <p>(1 submission)</p>	Yes (1e)	The plan has been amended accordingly.
93	Visitors accessing the Walpole and Nornalup Inlets need to be alerted to the risk of the naturally occurring bio-available mercury contaminating seafood in this potential marine park. This information has previously been provided to the Chair of the Walpole Wilderness Stakeholder Reference Group. It would therefore make more sense to transfer any potential marine park status to the Broke Inlet and provide the appropriate management. I would find it appropriate to put a Ranger at the mouth of the Inlet so that it opens at its own (natural) discretion (1 submission) .	No (2c)	The risk of contamination in seafood is not specific to Walpole and Nornalup Inlets and is the responsibility of Department of Fisheries and the Department of Health and is beyond the scope of the plan.
9.1.8 Waterbirds, shorebirds and seabirds			
94	A number of changes to the waterbird, shorebirds and seabirds objectives and strategies could be made to improve them:	No (2e)	Feral pests, although having an impact on water, sea and shorebird populations, are not a major pressure on these

No	Summary of issues / Major Points Raised	Amendment (criteria)	Discussion/Action
	<ul style="list-style-type: none"> Management objectives – You should include feral animals, particularly feral or domestic predators like cats, as an identified threat to minimise against. Include an additional strategy – ‘In partnership with community establish a monitoring program looking at the impact of feral or domestic animals and establish a management and control program where needed e.g. feral cats - domestic cat management (1 submission). 		populations. However, through the life of the plan, should the impact of feral pests increase, additional management actions can be taken. Feral pest management is however undertaken in the adjacent national park.
9.1.9 Sandy beaches and vegetation			
95	The plan should consider the likely impact on the foreshore land immediately adjacent to the jetties from users of the marine park and, in accordance with DEC's Good Neighbour Policy, make provision for related off-park services, such as adequate formal car and boat parking, fish cleaning facilities, rubbish, boat effluent discharge point etc. The plan needs to provide clarification on any restrictions that effect foreshore management such as treatment for weeds, fire management, and access. It is also suggested that the plan requires a separate agreement wherever interaction between the marine park and the foreshore is anticipated (e.g. town jetty and at Rest Point) (1 submission) .	No (2d)	The marine park is declared to the low water mark, and provision of adjacent facilities can only be undertaken where DEC is the landholder or where arrangements have been made with the landholder. However provision of visitor facilities that enhances visitor enjoyment is a management objective of the plan and the provision of additional facilities will be assessed based on adequacy of existing facilities and the potential impacts on the marine park's ecological and social values. Regarding management of the foreshore area, DEC will work in collaboration with adjacent landholders.
96	Fire management needs to recognise the high ecological values of wetlands, and the adverse changes to those values caused by both prescribed and wildfire. Wetlands need to be buffered/protected from fire, particularly <i>Reedia</i> and peat wetlands (1 submission) .	No (2c)	Fire management issues are outside the scope of the plan but addressed through the management plan for the adjacent national park.
97	The 10 year baseline study by VCSRG has not been referenced: <ul style="list-style-type: none"> V & C Semeniuk Research Group 2001. A baseline study of the Walpole-Nornalup Inlets. Report to the Shire of Manjimup. April 2001. Semeniuk V (ed) 2007. The Walpole-Nornalup Inlet estuary - a baseline study. Western Australian Museum (in press). (1 submission)	Yes (1e)	These references have been added.
98	The establishment of the marine park in the Walpole and Nornalup Inlets is a good way to protect the estuarine and adjoining wetlands system if there is an appropriate buffer zone around the estuary system. The buffer zone should include the paluslopes that border the estuary, as they essentially comprise the peripheral vegetation around the estuaries, and also	No (2c)	The CALM Act only allows the marine park to be declared to high water mark. The management plan for the adjacent Walpole Wilderness Area will address these systems.

No	Summary of issues / Major Points Raised	Amendment (criteria)	Discussion/Action
99	<p>provide a transition into upland ecosystems. The buffer zone should also incorporate at least 100 m of the adjoining dryland vegetation on the outer edge of these paluslopes (1 submission).</p> <p>A consensus should be formed between all stakeholders to the effect that all foreshore areas currently vested as unallocated crown land or with the Shire should be vested as national park with DEC (1 submission).</p>	No (2c)	This is beyond the scope of the plan.
9.2.1 Recreational fishing			
100	More control required for fishing (size & quantity) (1 submission).	No (2c)	Controls on fishing, such as bag limits, are the responsibility of DoF and are beyond the scope of the plan.
101	Only recreational fishing, using DoF regulations (1 submission).	No (2a)	Support for the plan.
102	<p>Concerned was expressed regarding the accuracy of the DoF unpublished data (pg.48) stating that 38,365 black bream were taken by recreational fishers between December 2002 and November 2003 (6 submissions).</p> <p>In addition to providing the above statement, submissions made one or more of the following comments:</p> <ul style="list-style-type: none"> • Figure is too high (4 subs) • Unpublished data is unsubstantiated (2 subs) • This information was not presented to Focus Group for discussion before the plan's release (2 subs) • There are few anglers in winter months (1 sub) • Clarified the figures with DoF and the revised figure of 26 6000 is still high (2 subs) • This information is misleading to the public (3 subs) • No apology for the mistake or public notification regarding the mistake has been made (2 subs) • The only semi-accurate figures actually recorded are the 300 black bream caught by houseboat anglers (1 sub). 	Yes (1e)	DoF have provided DEC with updated figures regarding the catch of black bream. The incorrect figures have now been amended.
103	Lack of acknowledgement within the plan of the DoF South Coast Recreational Fishing Review outcomes and its implementation on January 1 2006. Throughout the consultation	Yes (1e)	The plan did acknowledge that new bag and size limits came into force on 1 January 2006, however the section

No	Summary of issues / Major Points Raised	Amendment (criteria)	Discussion/Action
	<p>process the Focus Group discussed the pending outcome of the review and specifically the potential reduction in bag limits for commonly caught fish species including black bream. The plan did not include information regarding the DoF change in bag limits for black bream from 20 to 8 which is a 60% bag limit reduction and the introduction of state-wide possession limits in 2003. For example, the possession limit away from a person's residence is 16 black bream in total regardless of how many days or weeks a visiting recreational angler may spend in the region (2 submissions).</p>		<p>has been expanded and also mentions the 60 per cent reduction in bag limits.</p>
9.2.2 Water sports			
104	<p>Jet skis should be allowed in the inlets (1 submission).</p>	No (2a)	<p>Support for the plan.</p>
105	<p>Water skiing and jet skis should be confined to a specific area (3 submissions). In addition to providing the above statement, submissions made one or more of the following comments:</p> <ul style="list-style-type: none"> • Perhaps the 'Weedy Bay' area at the back of Newdegate Island (1 sub). • A restricted area is necessary so others can choose to avoid it and enjoy safety, peace and quiet; the qualities which lead most of us to choose Walpole as a holiday destination (1 sub). • Alternatively clearly defined prohibited area for these activities areas are required. The plan fails to provide leadership or clarity on this issue (1 sub). 	Yes (1b)	<p>The use of jet skis for transiting is permitted in the same way that regular vessels are, however in recognition of the potential impact that freestyle jetskiing could have, this activity will be monitored to ensure that the marine park's ecological and social values are not impacted. Speed restrictions exist in the channels and the Walpole Inlet and one is proposed for the mouth of the Nornalup Inlet. The plan provides for additional speed restrictions to be imposed if necessary. With regards to water skiing, the plan now contains a strategy to gazette a water ski are in Nornalup Inlet, subject to environmental impact assessment and consultation with users.</p>
106	<p>Definitely no jet skis or waterskiing allowed (4 submissions). In addition to providing the above statement, submissions made one or more of the following comments:</p> <ul style="list-style-type: none"> • The plan must prohibit these activities both from a peace and quiet point of view and a practical reason as the only place to have these activities is in the centre of Nornalup Inlet and access would have to be from the Walpole Inlet which is 8 knots throughout. It is my experience that very few jetskis observe the speed regulations (apart from the bloody noise!) and we do not have or are likely to have a constant water police presence (1 sub). • It is not consistent with the pristine and tranquil nature of the inlets (2 subs). • These particular uses have the potential to cause foreshore erosion (1 sub). 	Yes (1b)	<p>The use of jet skis for transiting is permitted in the same way that regular vessels are, however in recognition of the potential impact that freestyle jetskiing could have, this activity will be monitored to ensure that the marine park's ecological and social values are not impacted. Speed restrictions exist in the channels and the Walpole Inlet and one is proposed for the mouth of the Nornalup Inlet. The plan provides for additional speed restrictions to be imposed if necessary. With regards to water skiing, the Focus Group and the MPRA felt that this activity was a valid and historical use plan now contains a strategy to</p>

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107	It seems anomalous that the plan supports the use of jet skis whilst also propounding the peace and quiet and remoteness virtues of the marine park (1 submission).	Yes (1b)	gazette a water ski are in Nornalup Inlet, however this is subject to environmental impact assessment and consultation with users. The use of jet skis for transiting is permitted in the same way that regular vessels are, however in recognition of the potential impact that freestyle jetskiing could have, this activity will be monitored to ensure that the marine park's ecological and social values are not impacted.
108	Request that jet skis have security of access across the inlet to the mouth (1 submission).	Yes (2a)	Support for the plan.
109	All recreational boats using the inlets should have onboard holding tanks, although it is unlikely that large boats will use inlets as the entrance is too shallow. Any boats wishing to overnight on the inlets must have holding tanks. However it is unlikely that the Shire of Manjimup will be able to provide effluent or rubbish disposal facilities and DEC should provide them (1 submission).	No (2a)	Support for the plan.
110	This organisation supports the approach that the management of water sports in the proposed marine park will primarily involve ensuring compliance with vessel regulations through education and enforcement. It is suggested that the proposed controls to restrict the number of non-commercial live aboard vessels and the nights they can spend in the inlet system will be problematic to enforce and monitor and may in fact be inequitable for owners of such vessels if a system is not put in place to share the use of the inlet system. On this basis, it would make more sense for such controls to be imposed once a long term sustainable water sport strategy is developed by DEC for the marine park. This organisation requests that the development of such a strategy and the assessment of the sustainability of water sports in the marine park should be undertaken in collaboration with Tourism WA (1 submission).	No (2e)	Restriction of the number of vessels spending more than two nights on the inlet to seven vessels will help ensure that the amenity values of the marine park are not impacted. However should the implementation of this strategy until the development of a long-term water sport strategy become an issue, then DEC will investigate alternate methods to ensure the amenity values of the marine park are maintained.
9.2.3 Commercial tourism			
111	The original drafts of the plan did nothing to indicate the impact to commercial operators should the marine park go ahead. While some information is provided within the final copy by the DEC as to what will happen to operators once the area is gazetted, it is very one-sided and provides no framework for operators to present their viewpoint to the public of	No (2c)	Additional information was included in the plan to provide information regarding the impact of the marine park proposal on commercial tour operators. The licensing arrangements for commercial tourism

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	<p>Western Australia. The very real concerns of the current commercial operators continue to exist and continue to be played down by the DEC, and include:</p> <ul style="list-style-type: none"> • Operators in marine environments are currently regulated by the DPI for licensing, mooring and jetty facilities and safety of any vessels on the water, DEC for environmental regulations, Waters and Rivers regulations and local government regulations. All of whom provide operating controls and checks. When a marine environment becomes a marine park, why then does there have to be an additional layer of licensing and operational constraints, which could just as effectively be built into the current governmental framework? • The current CALM Act and Regulations provide no latitude in the provision of licenses to those operators whose activities are not of a ‘transient’ nature, who have a considerable financial investment in their operations and are 100% solely operating in one geographic area. While the Minister has powers to intervene where required, in the past has declined to do so. • For those businesses which have operated in the inlet system for over 20 years, and who in the departments own words have worked hard to maintain the condition of the inlet system and provide education to its users, to be greeted with a licensing constraint of a maximum operating term of 5 years is completely unacceptable. No provision is made to take into consideration the length a business has previously operated before the marine park came into existence. • The current licensing arrangements are not geared towards the continued viability of any business, nor are they geared towards a comparable market value resale of the business. In fact, the licensing arrangements negatively impact a business resale value where a similar business exists outside a marine park where no such regulatory constraints exist. • The length of license provides no security for the longevity of the business and all business planning becomes very short term in nature simply to exist within the guaranteed timeframe of the license. • For a business that solely operates within one and only one geographic area, should the license cease to be renewed because the DEC believes that its continuation could be detrimental to the marine area, but through no fault of the operator, there is no avenue for compensation for loss of business. <p>None of this information is ever made public for the population of Western Australia to weigh against the decisions it makes in regards to marine parks. A complete review of the CALM Act and regulations in relation to marine park licensing and the tourism operations requirements is overdue. If this government is not aimed at killing off the small business</p>		<p>operations are specified under the CALM Act and are beyond the scope of this management plan.</p>

No	Summary of issues / Major Points Raised	Amendment (criteria)	Discussion/Action
112	<p>operator then it needs to review its current policies on supporting tourism and small business in this state (1 submission).</p> <p>Regarding the management of commercial tourism within the marine park:</p> <ul style="list-style-type: none"> It is recommended that DEC re-examine the "New Model for Nature Based Tourism" articulated in Tourism WA's <i>Nature Based Tourism Strategy for Western Australia</i> and use the same guiding policy for tourism opportunities which may arise as a result of the implementation of the plan. This organisation recognises that there are currently no significant management issues relating to commercial tourism in the proposed marine park and that the majority of commercial tourism operators currently hold T Class licenses issued by DEC. The move therefore to require T Class licensing for all operators in the marine park is supported, once the marine park is gazetted. Support is also given to the continued use of T Class licenses to manage commercial tourism in the marine park. It is agreed that the establishment of the more restrictive E Class licence would be appropriate if the marine park exceeds a pre-determined 'sustainable limit' of tourism operators, however this step should not be taken without appropriate consultation with Tourism WA and commercial tourism operators. <p>(1 submission).</p>	No (2d)	DEC supports the "New Model for Nature Based Tourism" and supports nature based tourism within the marine park. Should restricted E Class licences be deemed necessary this will be done in consultation with users.
9.2.4 Aesthetic values (scenery, peace and quiet, remoteness) (KPI)			
113	<p>The high significance of aesthetics and 'wilderness' values identified during the planning process will mean that pressure to increase access and use should be treated with caution. This is especially so with regard to uses with high visual impact, such as houseboats (1 submission).</p>	No (2d)	The plan addresses the importance placed on aesthetic values by designating this value as a key performance indicator. Other strategies include monitoring visitation and developing community agreed positions for maximum acceptable visitation levels.
114	<p>The statement on aesthetic values is vague and provides no guidance or policies whatsoever on what is to be considered "aesthetically pleasing". Aesthetics tends to be a matter of personal perception and in the absence of clear guidelines leaves it open to inconsistent interpretation. As a result, this is effectively a motherhood statement and of no practical value in assessing planning approvals. Furthermore, planning conditions imposed by reflecting this vague statement would be unlikely to be enforceable or defensible in a State Administrative Tribunal environment (1 submission).</p>	Yes (1e)	The short-term target for this value is the development of a community agreed position on visitation levels, and the determination of management targets for visitation has been elevated to a key management strategy.

No	Summary of issues / Major Points Raised	Amendment (criteria)	Discussion/Action
13 Appendices			
115	Appendix 2 – The timeline appears largely superfluous due the priority ranking or type of activity that determines the timeliness of actions. The timeline would be more informative if the strategies were broken into steps, which are then indicative or milestones towards the management outcome of the strategy (1 submission).	No (2e)	The aim of the timeline is to provide a broad guideline as to when the strategies will be implemented. Details, including steps and milestones would form part of the annual works program for the Frankland District, who will be responsible for implementing the plan.

APPENDIX

Appendix I: Acronyms

CALM Act	<i>Conservation and Land Management Act 1984</i>
DEC	Department of Environment and Conservation
DoF	Department of Fisheries
DPI	Department for Planning and Infrastructure
DoW	Department of Water
EPA	Environment Protection Authority
EP Act	<i>Environment Protection Act 1986</i>
KPI	key performance indicator
MPRA	Marine Parks and Reserves Authority
NRM	natural resource management
SCNRMI	South Coast Natural Resource Management Incorporated
SWCC	South West Catchment Council
WAINSAC	Walpole and Nornalup Inlets Systems Advisory Committee