

PARKS AND RESERVES OF YANCHEP AND NEERABUP

Analysis of Public Submissions

to the

Draft Management Plan

Department of Environment and Conservation

for the

Conservation Commission of Western Australia

INTRODUCTION

This document is an analysis of public submissions to the *Parks and Reserves of Yanchep and Neerabup Draft Management Plan 2010*.

The plan was released for public comment by the Conservation Commission of Western Australia on 8 March 2010. The submission period closed on 14 May 2010.

On release of the plan, advertisements were placed in two issues of the local newspaper, *The Times*, and two issues of *The West Australian*, advising that the plan was available for comment. The plan was distributed to government departments, tertiary institutions, recreation and conservation groups, local government authorities, libraries and other community groups and individuals who expressed interest during the preparation of the draft management plan. The plan was available for viewing and/or downloading from the Department of Environment and Conservation's (the Department) website, to which electronic submissions could be made. Printed copies of the plan were made available at the Department's offices in Kensington, Wanneroo and Yanchep National Park.

During the planning process for this plan, the Conservation Commission and the Department was in the process of transitioning to a more concise format for management plans. In line with the new approach, the final management plan has been significantly reduced in size compared to the draft and contains less descriptive background information. While all comments have been taken into consideration, some submitter comments regarding changes to text may not have been applied if that text no longer appears in the final plan.

A total of 13 submissions were received. All submissions have been considered and changes have been made to the plan where appropriate.

Submitters are listed in Appendix 1.

METHOD OF ANALYSIS

A summary of all comments (other than those suggesting minor editorial changes) is presented in the analysis table (Table 1).

Each comment made was assessed using the following criteria.

1. The draft management plan *was* amended if a submission:
 - (a) provided additional information of direct relevance to management
 - (b) provided additional information on affected user groups of direct relevance to management
 - (c) indicated a change in (or clarifies) Government legislation, management commitment or management policy
 - (d) proposed strategies that would better achieve management objectives
 - (e) indicated omissions, inaccuracies or a lack of clarity.
2. The draft management plan *was not* amended if a submission:
 - (a) clearly supported proposals in the plan
 - (b) made general statements and no specific change to the plan was sought
 - (c) made statements already in the plan or that were considered during the plan preparation
 - (d) addressed issues beyond the scope of the plan
 - (e) was one amongst several widely divergent viewpoints received on the topic but the text/strategies in the plan were still considered the preferred option
 - (f) contributed options that were not feasible (generally due to conflict with existing legislation, government policy, lack of resource capacity or lack of research knowledge to make decisions)
 - (g) was based on unclear, factually incorrect information
 - (h) provided details that are not appropriate or necessary for inclusion in a document aimed at providing management direction over the long term
 - (i) was no longer applicable as a result of the modified plan format.

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

Table 1: Analysis of Public Submissions

Comment Number	Section	Summary of Comment	Amended (Criteria)	Discussion
General				
1		General support for the management plan proposed.	No (2a)	Support noted.
2		Document too large.	Yes (1c)	The final management plan is significantly reduced in size in accordance with new Conservation Commission of WA requirements.
3		No commitment to action the plan.	No (2c)	See Section 11 of the draft plan. The Conservation Commission of WA assesses the performance of the department in carrying out and complying with management plans. The inclusion of key performance indicators in the management plan assists with this process.
4		Plan not flexible enough.	No (2g)	Comment unclear - insufficient detail.
5		There is a need for more widely experienced staff to implement the plan.	No (2h)	Comment noted. All submissions and this summary document are considered by the District staff responsible for the day-to-day management of the reserves.
6		More on-ground workers needed.	No (2h)	Comment noted. All submissions and this summary document are considered by the district staff responsible for the day-to-day management of the reserves.
7		Volunteer system needs overhauling.	No (2g)	General opinion noted. Submission does not elaborate upon or specify issues and therefore it is unclear what changes the submitter considers necessary.
8		Too little is done. Less administration and rhetoric and more action is required.	No (2c, 2g)	The Conservation Commission of WA assesses the performance of the department in carrying out and complying with management plans (see Section 11 of the draft). The inclusion of key performance indicators in the management plan assists with this process.
9		Security needs to be upgraded (e.g. surveillance cameras installed at entry points).	No (2h)	Opinion noted. All submissions and this summary document are considered by the district staff responsible for day-to-day management of the reserves and development of operational level plans.
10		Suggests an alternative, more appropriate image is used for the cover of the final plan (some alternatives to be provided).	Yes (1e)	
11		The Mitchell Freeway corridor is a major development of significance to this area and should be shown on Maps 1-5.	Yes (1e)	
12		Current and proposed alignments of the rail line should be shown on maps for clarity.	Yes (1e)	
13		Priorities are placed on new roads, new plans for visitor services while once-valued conservation areas are run-over, run-down and neglected. Regular reporting is needed on environmental condition and trends need to be identified. Immediate management responses need to be implemented to	No (2b)	The plan includes provisions for environmental monitoring and adapting management responses. The Conservation Commission of WA assesses the effectiveness of management plans in achieving the stated objectives. The key performance indicators included in the plan assist with this process.

Comment Number	Section	Summary of Comment	Amended (Criteria)	Discussion
		retain natural values before long-term decline sets in. The recognition, planning and execution lags need to be reduced.		
14		Many of the actions in the plan do not identify the responsible agency that will implement them. It would be useful if this was identified in the plan.	Yes (1e)	The management plan has been produced by the department on behalf of the Conservation Commission of WA and will be implemented by the department. The plan includes some strategies which specify varying degrees of involvement of other agencies. Some amendments have been made to clarify the role of some agencies (e.g. Department of Water).
15		Amend the front cover photos to colour ones of something Indigenous (guided walk tour with an Indigenous guide) and a European component (e.g. koalas and caves).	Yes (1b)	The photos on the front cover of the final plan include some of the images suggested.
16		The <i>Vision</i> is too long.	Yes (1b)	The vision was developed in consultation with stakeholders and reflects a collective vision specific to the planning area reserves. Some minor amendments have however been made to reduce the length of this section.
Part A Introduction				
Regional Context				
17	Paragraph 5	The Gngangara Groundwater Areas Allocation Plan should be mentioned in conjunction with the Gngangara Sustainability Strategy.	Yes (1e)	
18		The Title of Figure 1 should be amended to management areas covered by the plan and urban expansion by 2030.	No (2i)	Agreed that the title suggested would be more accurate, however this image was not used for the final plan.
19		The planning area is not well placed in a general context and the introduction looks specifically at issues within the park boundary.	Yes (1e)	Regional management issues are taken into account throughout the planning process. Some minor amendments have been made to highlight some of these in the final plan.
20		Broader view required given current and proposed future urban expansion.	Yes (1e)	Amended to refer to declining groundwater issues and show links to other regionally significant bushland.
21		Include a forward plan to retain and improve connectivity with other remnant bushland.	Yes (1e)	Amended to refer to declining groundwater issues and show links to other regionally significant bushland.
22		Mention the link between pine plantations drawdown and water issues in the region and the park boundary.	No (2h)	The final plan mentions that surrounding land uses are a contributing factor to declining groundwater levels and refers the reader to other documents which provide more detailed and specific information on these matters.
23		Gngangara Park was a forward-thinking planning proposal, but it has not eventuated.	Yes (1e)	The reference to Gngangara Park has been removed from the final plan.
Key Values				
24		It should be highlighted that many of the key values are groundwater dependent.	No (2c, 2e)	The purpose of this part of the plan is to briefly list the key values. This issue is discussed in more detail in other parts of the plan as relevant.
25		Key recreational values section does not mention bushwalking/ecotourism.	No (2e)	The purpose of this part of the plan is to briefly rather than comprehensively list or detail the key values. Further detail is provided

Comment Number	Section	Summary of Comment	Amended (Criteria)	Discussion
				in other parts of the plan as relevant. The examples of recreational activities have been deleted from the key values list.
Part B Management Directions and Implementation				
Legislative Framework				
26	5	Add the <i>Rights in Water and Irrigation Act 1914</i> .	Yes (1e)	Reference to this legislation has been included in the section entitled <i>Water Resources</i> .
Management Arrangements with Indigenous People				
27	6	Promises made in this section are not supported later in the document.	Yes (1e)	Some amendments have been made to the Indigenous Cultural Heritage section of the plan regarding these matters.
Existing and Proposed Reserves				
28	10	The future possible Mitchell Freeway extension skirts along the western boundary and through part of the planning area - formalisation of the appropriate reserve needs to be managed appropriately and well before any future extension to avoid project delays and cost overruns. References to excision from Yanchep National Park are mentioned but the plan does not appear to require any action.	No (2f)	The department would not action any excision from the park until it had a formal and detailed proposal to consider. Excisions of areas from class A reserves involve a lengthy approvals and administration process and need to be referred to State Parliament. It is recommended that Main Roads WA take this into account when planning road developments and approaching the department and Conservation Commission regarding proposals for excising areas from conservation reserves.
29	10	While the plan refers to liaising with relevant agencies (e.g. Main Roads) regarding appropriate management and maintenance of roads, it does not identify firm action. Formalisation of the appropriate reserves is required.	No (2f)	See discussion for comment 28.
30	10	Support for purchase of Lot 51 which has significant karst features for addition to the conservation reserve system.	No (2a)	Support noted. Lot 51 is however private land not currently for sale and therefore specific reference to it has been deleted from the final. The department is not able to compulsorily acquire land. However, general provisions for purchasing land of high conservation value as opportunities arise have been retained. The department can also use other off-reserve conservation measures to protect values such as threatened species and communities.
31	10	Lot 51 needs to be acquired and added to the park urgently or it will be lost to the rapid urban infill occurring in the area (submitter lists a number of values). If this cannot be purchased then it could possibly form part of a land swap for the area of Yanchep National Park that will be lost to the park by the Mitchell Freeway extension. "A high conservation area with increasingly rare communities ought not to be lost through government inertia".	No (2f)	Lot 51 is private land and the landowner has advised that it is not for sale. See discussion for comment 30 also.
32		"Acquire surrounding blocks within 1 km of the park before they become housing or turf farms".	No (2f)	The final plan includes provisions for purchasing land of high conservation value as opportunities arise. The department is not able to compulsorily acquire land for conservation purposes.
33	10	The Department of Mines and Petroleum does not support the	No (2e)	The Ridges area has very high conservation values and is an area that

Comment Number	Section	Summary of Comment	Amended (Criteria)	Discussion
		extension of the conservation reserve system to include Ridges. Reasons detailed in submission include: it contains high grade limestone which is of strategic importance because there are limited alternative sources in the metropolitan area, two live mining leases occur in the area, and it is recognised in WAPC SPP 2.4 as a resource extraction area.		has repeatedly been identified as a strategically important inclusion into the conservation reserve system. In the final plan granted mining leases M70/140 and M70/142 have been excluded from the proposed addition to Yanchep National Park. However, the plan recommends that because the granted lease areas contain some of the best remaining examples of threatened limestone vegetation they could be included in the national park if mining does not proceed. Where there are competing land uses, proposals for reserve creation may be referred to the State Government for a final decision.
34	10	Acquisition of Lot 51 is fully supported. Submission suggests amendments regarding additional values of the area.	No (2i)	The final plan notes that land of high conservation value can be purchased as opportunities arise. Also see discussion for comment 30.
35	10	Full support for conservation reserve expansion proposals.	No (2a)	Support noted.
36	10	To initiate the process of incorporating Reserves 13713, 25252 and 25253 into the reserve system, the City of Wanneroo expects: (1) offset proposals required to obtain a clearing permit under the <i>Environmental Protection (Clearing Native Vegetation) Regulations 2004</i> and/or approval under the <i>Environmental Protection and Biodiversity Conservation Act 1999</i> ; (2) Confirmation of the land transfer process ;(3) to negotiate the responsibilities of each agency before land transfer.	No (2d)	These matters are beyond the scope of the management plan, and the questions raised will be addressed in separate correspondence with the City of Wanneroo.
Part C Managing the Natural Environment				
Geology, landform and soils				
37	15	There should be a section specifically dedicated to cave management issues - these are the reason that the park was first created.	Yes (1e)	
38	15	Comments on cave distribution need to be included (submitter provided some information).	Yes (1e)	The information provided by the submitter has been included in the final management plan.
39	15	Main Roads WA looks forward to discussion about what is envisaged to minimise adverse impacts of the freeway on the transition zone between Quindalup and Spearwood dune systems.	No (2b)	Environmental impacts cannot be accurately assessed in the absence of a specific and detailed proposal.
40	15	The word 'caves' should be substituted for 'karst' in the first sentence under the heading Karst - karst development does not only relate to the intersection of limestone with the watertable.	Yes (1e)	
41	15	The number of karst features needs to be updated.	Yes (1e)	
42	15	The Department of Water would like to provide information from a Shallow Groundwater System Investigation regarding Lake Yonderup, Loch McNess and Lake Nowergup (submission details finding for these wetlands). This work has	No (2b)	The department thanks the Department of Water for providing this information. While it has been taken into account in preparation of the final plan, it was not considered necessary to include all of the details into a strategic level document.

Comment Number	Section	Summary of Comment	Amended (Criteria)	Discussion
		assisted in improving knowledge of the hydrogeology of the area. Further information is available from the Department of Water if required.		
Hydrology				
43	16	The severe drop of water tables throughout Yanchep National Park is much greater than elsewhere on the Gngangara Mound and needs to be mentioned. (Submitter details an opinion that local water input attempts will not work, that seasonal rainfall infiltration is intercepted by the pine plantations and that the only feasible long term solution is complete removal of the plantations).	No (2d, 2h)	It is not the role of this management plan to provide a detailed analysis of the groundwater decline issue and causative factors, but it does include references to other documents where this information has been included, and it does take the management implications of groundwater decline issues into account.
44	16	As Loch McNess is the recreational focal point for Yanchep National Park, the plan should state that priority is to be given to halting the imminent drying.	No (2d)	Response to the issue of groundwater decline requires a whole of government approach and the plan refers to the Gngangara Sustainability Strategy and the Gngangara Groundwater Areas Allocation Plan, which discuss the whole of government management response to the issue of groundwater availability.
45	16	Main Roads WA has noted the importance of the planning area wetlands and will keep this in mind for future projects.	No (2b)	
46		An independent expert study of the whole of Loch McNess over several seasons needs to be undertaken, in conjunction with wildlife experts.	No (2g)	Loch McNess has been subject to regular and ongoing study as part of the Department of Water's Gngangara Mound monitoring program.
47	16	The Department of Water has carriage of the water management aspects of the Gngangara Sustainability Study.	Yes (1e)	This was understood within the department, but the final plan has been amended to make this explicitly clear.
48	16	While the current volume of licensed water entitlement for the Yanchep Groundwater Area is below the allocated limit, release of water would not be made in areas where there were potential adverse impacts on groundwater dependent ecosystems.	No (2a, 2c)	Understood. The plan includes strategies requiring groundwater abstracted for park purposes to be sustainable and the department supports all measures to ensure groundwater is only abstracted within ecologically sustainable limits.
49	16	The Gngangara Groundwater Areas Allocation Plan has reduced the amount of water available for abstraction by 13% across the mound, however further reductions will need to be made in the next allocation plan.	No (2b)	Noted.
50	16	The Department of Water is finalising reports from a detailed investigation at Loch McNess, Lake Yonderup and Lake Nowergup as part of the Perth Shallow Groundwater Systems. This will improve understanding of interrelationships between these wetlands and the superficial aquifer.	No (2b)	The department looks forward to receiving the results of this investigation.
51	16	Ministerial Statement No. 819 details the criteria to which the Department of Water is currently required to manage Loch McNess, Lake Yonderup, Lake Wilgarup, Pipidinny Swamp	No (2b)	Noted.

Comment Number	Section	Summary of Comment	Amended (Criteria)	Discussion
		and Lake Nowergup. Reports detailing compliance with criteria are submitted to the Department of Environment and Conservation and the Environmental Protection Authority triennially.		
52	16	The Department of Water has a Ministerial commitment to artificially maintain water levels at Lake Nowergup to meet water level criteria and maintain water management objectives.	No (2b)	Noted.
53	16	The Department of Water has representatives on the Yanchep Caves Recovery Team and undertakes water level, water quality and cave fauna monitoring within the caves. The most recent monitoring results show that despite supplementation there has been no evidence of recovery in the aquatic cave fauna.	Yes (1a)	Comments regarding the recovery status of aquatic cave fauna have been included in the final plan.
54	16	The Department of Water would like to provide information from a Shallow Groundwater System Investigation regarding Lake Yonderup, Loch McNess and Lake Nowergup (submission details finding for these wetlands). This work has assisted in improving knowledge of the hydrogeology of the area.	No (2h)	The department thanks the Department of Water for providing this information. While it has been taken into account in preparation of the final plan, it was not considered necessary to include all of the details into a strategic level document.
55	16	Environmental Water Requirements established as Ministerial criteria exist for a number of wetlands in the planning area (submission included a table which summarises current compliance at each of these sites, all of which are non-compliant). This highlights the importance of implementing the Gngara Groundwater Areas Allocation Plan and of the need for all agencies to commit to implementing the Gngara Sustainability Strategy.	No (2b, 2h)	The department supports and encourages measures that will improve the ecological condition of the groundwater dependent ecosystems within the planning area. Implementation of such measures is required as a matter of urgency. The information provided has been noted, but it was not considered necessary to include all of the details into the final management plan.
56	16	Paragraph 6 refers to PRAMS Analysis - the Department of Water should be contacted for more recent PRAMS analysis results.	No (2i)	
57	16	Artificial maintenance of Lake Nowergup "has generally been successful in maintaining lake levels despite the falls in groundwater levels, however falling groundwater levels are now having an effect on fringing wetland trees (<i>Melaleuca raphiophylla</i> and <i>Eucalyptus rudis</i>)".	Yes (1a)	This information has been included in the final plan.
58	16	Declining rainfall, nearby irrigation and water abstraction by Water Corporation are thought to be the main causes for declining groundwater levels.	No (2c)	
59	16	The Department of Water has recently completed an assessment of the artificial water maintenance at Lake	No (2b)	The department looks forward to receiving the results of this investigation.

Comment Number	Section	Summary of Comment	Amended (Criteria)	Discussion
		Nowergup and an investigation into the hydrogeological and ecological interactions at the lake.		
60	16	The 2005 State of the Mound is out of date and references used to describe wetlands within the planning area could also be updated.	Yes (1a, 1e)	The final plan includes more up-to-date references.
61	16	More up-to-date information is available about the condition of Ministerial criteria wetlands that fall within the planning area (submission provides some more up-to-date information regarding Lake Wilgarup, Pipidinnny Swamp and Lake Nowergup).	No (2h)	The department thanks the Department of Water for providing this information. While it has been taken into account in preparation of the final plan, it was not considered necessary to include all of the details into a strategic level document with a 10-year timeframe.
62	16	Strategy 2: Artificial maintenance of Lake Nowergup is unlikely to be sustainable in the face of a continuation of dry climate. The questions of whether artificial maintenance can protect the values of the lake and whether this is the most effective use of a limited groundwater resource are currently being addressed by the Department of Water as part of the next Gngara Areas Allocation Plan.	No (2b)	The Department of Water has a Ministerial commitment to artificially maintain water levels at Lake Nowergup. The department must be adequately consulted regarding any intention to change the water maintenance regime because this will impact on the ability of this department to meet its nature conservation objectives.
63	16	Strategy 6: See findings from the Perth Shallow Groundwater Systems Investigations.	No (2b, 2h)	The department thanks the Department of Water for providing this information. While it has been taken into account in preparation of the final plan, it was not considered necessary to include all of the details into a strategic level document.
64	16	Strategy 7: Recent investigations indicate that drawing groundwater to artificially maintain the lake would only exacerbate declining groundwater levels and the additional surface water would not be held up due to high hydraulic conductivity between the groundwater and the lake. The Department of Water is unlikely to support artificial watering of Loch McNess. This department should be contacted regarding the Shallow Groundwater System investigation of Loch McNess.	Yes (1a)	Strategy deleted.
65	16	The Department of Water has responsibilities for the activities described in strategies 8 and 9:	No (2c)	The department recognises that the agency responsible for this is the Department of Water. The actions have been included because they are important to meet nature conservation objectives and the department must ensure that they occur (despite them not being directly implemented by this department). The plan now explicitly states that the Department of Water has responsibilities for such activities.
66	15	Environmental Water Requirements established as Ministerial criteria exist for a number of wetlands in the planning area (submission included a table which summarises current compliance at each of these sites, all of which are non-	No (2h)	The department supports and encourages measures that will improve the ecological condition of the wetlands within the planning area. Implementation of such measures is required as a matter of urgency.

Comment Number	Section	Summary of Comment	Amended (Criteria)	Discussion
		compliant). This highlights the importance of implementing the Gngara Groundwater Areas Allocation Plan and of the need for all agencies to commit to implementing the Gngara Sustainability Strategy.		
Native Plants and Plant Communities				
67	17	Recent hot wildfires have reduced the numbers of old tuarts, and the continued decline in groundwater ensures that this condition will persist. The root mat communities are less likely to survive if tuarts do not survive to send down deep roots.	No (2c)	The significance of protecting the tuart trees is identified in the plan.
Native Animals and Habitats				
68	18	The cave fauna is only referred to under Aquatic Invertebrates - the plan should note that not all of the cave invertebrate fauna is aquatic.	Yes (1e)	Plan amended.
69	18	Support for the department acquiring/purchasing areas with occurrences of Aquatic Root Mat Community Number 1 of Caves of the Swan Coastal Plain where feasible and appropriate.	No (2c)	The final plan includes provisions for purchasing land of high conservation value as opportunities arise. It should be noted that the draft management plan indicated that purchasing areas is not the only feasible conservation measure, and other off-reserve conservation measures may be necessary instead.
70	18	The plan doesn't refer to issues related to the artificial water supplementation project for the threatened ecological community - i.e. the hydrological alteration to the karst system and alteration to the water's chemical composition.	No (2h)	The supplementation system is referred to in the plan, but it is not necessary to detail contemporary issues of the system in a 10-year strategic plan - the system will continue to be modified as necessary to meet objectives over the life of the plan.
71	18	"The groundwater rewatering project is handballed to unqualified or junior staff, or just ignored for long periods by busy water department staff. The current root mat communities recovery program is a sham, and needs to be made the responsibility of a qualified senior officer".	No (2g)	The project is overseen by a recovery team which includes senior, specialist staff.
72	18	The rare and endangered aquatic communities once found in Crystal Cave had a related species found on Lot 51 Walding Road. Lot 51 should be investigated to see if it supports these species or some elements, and be added to the park.	No (2c, 2f)	Some study of this area has recently been undertaken by university researchers. The area is not currently for sale, but the plan includes provision for purchasing land of high conservation value as opportunities arise. The department is not able to compulsorily acquire land for conservation purposes. Other off-reserve conservation measures are available to protect threatened species and communities.
73	18	The Department of Water undertakes macroinvertebrate/invertebrate monitoring at selected wetlands and caves within the planning area (submission details some results from 2009 spring monitoring).	No (2h)	The department thanks the Department of Water for providing this information. While it has been taken into account in preparation of the final plan, it was not considered necessary to include all of the details into a strategic level document.
Fire				
74	23	The section on the impact of fire on karst is appropriate.	No (2a)	Support noted.

Comment Number	Section	Summary of Comment	Amended (Criteria)	Discussion
75		Sections of Yanchep National Park along the eastern side of the loch need special protection from fire to protect tuart trees and the root mat communities.	No (2c)	The significance of protecting tuart trees is identified in the plan.
76	23	Submission recommending numerous edits to text in this section of the plan.	No (2i)	Many of the editorial changes recommended have not been made because they related to text that has not been retained in the more concise final plan. However, other substantive recommendations have been taken into consideration in preparation of the final plan.
Environmental Weeds				
77	20	<i>Eucalyptus rudis</i> used in koala feed plantations is a native species and should not be referred to as non-indigenous.	Yes (1e)	Amendment made.
78	20	Please liaise with Main Roads WA (Manager, Metropolitan Road Program) regarding any proposals to remove lemon-scented gums along Wanneroo Road, so that the implications of this can be fully appreciated.	Yes (1b)	A statement has been included in the final plan regarding consultation with Main Roads WA regarding such matters.
79	20	The weed control plan should reflect a strong commitment and identify the necessary resources to meet weed management objectives.	No (2a, 2h)	A key performance indicator has been identified for this section of the plan. The Conservation Commission of WA assesses the performance of the department in carrying out and complying with management plans. Key performance indicators are a tool that the Conservation Commission can use to assist with performance evaluation. Details of resource allocation will be considered in annual operational level plans rather than this strategic level management plan with a 10-year time.
Introduced and Other Problem Animals				
80	21	Downplay the reference to goats. These have not been seen since fire in 2009. The key performance indicator needs to be revised. Foxes, cats and rabbits are a higher priority.	Yes (1a)	
Diseases				
81	22	Should include botulism as the impact of this developing after algal blooms is more likely to impact on birdlife than bird flu.	No (2e)	This section has been significantly reduced in size and only refers to some of the most likely disease threats. Algal blooms are not a common feature of the planning area wetlands. The plan includes strategies to maintain water quality, including measures to prevent increases in wetland nutrient loads which could fuel algal blooms. It should be recognised however that nutrient loads in the wetlands are influenced by historical land uses and current surrounding land uses over which the department has limited control.
82	22	Consider inclusion of marri canker, which poses a significant health and safety issue.	No (2e)	This section has been significantly reduced in size and only refers to some of the most likely and significant disease threats currently known.
Rehabilitation				
83	24	There is too much reliance on volunteers for rehabilitation. Funds should be allocated to improve ecosystem condition on an ongoing basis.	No (2e, 2h)	Funds are allocated to improve ecosystem condition on an ongoing basis, however funding allocation for the planning area is not unlimited and occurs in the context of regional/district priority setting and

Comment Number	Section	Summary of Comment	Amended (Criteria)	Discussion
				budgeting processes. Volunteer programs are highly valued by the department, not only for increasing its work capability and skills base, but also because they help to foster communication links and understanding between the department and the community.
84	24	Opportunities should be explored "to enter into rehabilitation arrangements with other parties that require offset sites to mitigate environmental impact of activities nearby".	No (2h)	The department does enter into various agreements along these lines in managing the conservation estate.
Part D Managing Our Cultural Heritage				
85	25	Support for Indigenous heritage management proposals.	No (2a)	
86	25	Development an Aboriginal heritage management plan should be considered.	No (2h)	The plan does not prevent such a plan being prepared should the need arise. Development of such a plan has not been incorporated into the strategies as a specific need has not been identified at this stage.
87		Cultural heritage information presented about the park has been lost or is conflicting. Resources should be allocated to accurately record the cultural heritage of the park.	No (2g)	A number of heritage consultant reports which document the history of the park already exist for park staff to use.
88	25	Appropriate measures have been identified for management of Indigenous heritage issues, however the Western Australian Museum has major concerns regarding caving in Yonderup Cave as discussed in Section 30.3.	No (2a)	See discussion of submission comments under <i>Caving</i> regarding concerns about Yonderup Cave.
89	26	The management plan should "include the capacity for an increase in the Indigenous component and to recognise the importance of Indigenous values".	No (2c, 2g)	It is unclear what the submitter is requesting. The plan recognises Indigenous cultural values and provides for the protection of these and also recognises Aboriginal aspirations to 'care for country' and engage in activities for customary purposes.
Part E Managing Visitor Use				
General				
90		Old (and burnt) shelters should be progressively replaced.	No (2h)	Facilities such as shelters are replaced as resources allow.
91		Establish attractions such as treetop walk and observation tower.	No (2f)	Such proposals could be considered over the life of the plan, but would need to be considered within the context of overall priorities for resources.
92		The department should give consideration to supporting development of an Indian Ocean Drive visitor information pull-off bay at the intersection of the Wanneroo Road and Yanchep Beach Road turn-off. This would provide an opportunity to showcase the attractions at Yanchep National Park.	No (2h)	Information will be considered by the district/park staff responsible for dealing with marketing of Yanchep National Park.
Visitor Opportunity				
93	28	Include forecasts for future visitation reflecting the increases in population, housing, freeway etc. and how these will be managed.	No (2c)	These were already covered in other parts of the management plan.

Comment Number	Section	Summary of Comment	Amended (Criteria)	Discussion
Visitor Access				
94	29	The upgrade of Wanneroo Road through the park is growing in importance with the construction of the Lancelin to Cervantes Road. Main Roads WA will plan these carefully with due consideration of the environmental issues.	No (2b)	
95	29	Currently Wanneroo Road is a road formation on land which has national park status.	No (2c)	
96	29	Yanchep Beach Road, Yeal Swamp Road and Wanneroo Road should retain their current vesting to avoid introducing too many jurisdictions with conflicting philosophies and employees who do not have an understanding of nature conservation.	No (2e)	Main Roads WA/local government have the most appropriate resourcing and expertise for managing public roads in the planning area. Nature conservation impacts can be addressed through consultation and liaison between the various agencies.
Recreational Activities and Use				
97	30	Decline in the range of recreational activities available for visitors to Yanchep National Park has resulted in a decline of the coach tour market. With the reduced time the coach market will need to access destinations north of Perth via the new Indian Ocean Drive, coaches could be encouraged back with appropriately timed and planned early morning fauna and Indigenous tour experiences. Tour options which complement the coach market's tour programs and pricing should be developed.	No (2h)	Information will be considered by the district/park staff responsible for development of operational and marketing plans.
98	30	The park would benefit by developing a mix of new product offerings that are attractive to a range of markets (e.g. local, educational and tourist).	No (2h)	Information will be considered by district/park staff responsible for development of operational and marketing plans.
99	30	Consideration should be given to introducing an inexpensive park and ride system (e.g. small bus, buggy) within Yanchep National Park, which would enable elderly and other visitors to access more of the park without driving or walking.	No (2h)	Information will be considered by district/park staff responsible for development of operational and marketing plans.
100	30	Consideration should be given to developing a playground/activity-based sculpture park which would appeal to the family market and help compensate for the reduction in what were very popular water-based activities.	Yes (1b)	The plan has been amended to include development of a playground as an option.
101	30	Wider promotion of the golf course should be investigated. Increased use of the course could promote business opportunities in the hiring of clubs and accessories.	No (2h)	Information will be considered by the district/park staff responsible for development of operational and marketing plans.
102	30	The department should lead development of collaborative partnerships and a coordinated program of delivering the schools program. A schedule of fees that better reflects the needs of this market should be developed.	No (2h)	Information will be considered by the district/park staff responsible for development of operational and marketing plans.

Comment Number	Section	Summary of Comment	Amended (Criteria)	Discussion
103	30	The early morning koala and native fauna experience should be reintroduced with a fee structure tailored to encourage the coach tour market back to the park. Tourism WA could provide further advice.	No (2h)	Information will be considered by the district/park staff responsible for development of operational and marketing plans.
104	30.1	Figure 6 is not up to the standard of the document.	No (2e, 2 g)	Unclear what changes the submitter is suggesting are necessary.
105		Planning and development of walking and cycling trails should involve consultation with the City of Wanneroo and developers in adjacent areas to integrate with new/surrounding residential developments.	Yes (1e)	Plan amended accordingly.
Caving				
106		Yonderup was not "previously an adventure cave", it was until 1984 a fully guided cave with electric lighting. The cave was closed because of Indigenous sensitivities.	No (2i)	Error acknowledged. The text in question has however not been retained in the more concise final plan and therefore amendment not made.
107	30.3	Yonderup is the only feasible cave (lowest budget option) for tourist use as others which might have been considered have been ruined through vandalism and poorly planned and managed road developments.	No (2i)	Noted. Comment no longer applicable as text in question has not been retained in the more concise final plan. See also submission comment 116 for some cultural heritage issues which will require resolution before this cave can be developed for tourist use.
109		Other caves could potentially be considered for tourism provided sufficient budget was made available for installation of necessary infrastructure (the submission details some examples).	Yes (1e)	Noted. The plan provides for the potential development of another cave for tourism use. These matters will be further considered during implementation of the management plan.
110	30.3	This section and its footnotes are excellent and succinct.	No (2a)	
111	30.3	Encouragement of adventure caving is supported, however the impact of visitors on the caves needs to be carefully monitored.	No (2a, 2c)	
112	30.3	The section on key performance indicators should be more comprehensive and include other ways of monitoring the karst environment (submitter indicates they could be consulted further regarding suggestions).	No (2e)	Additional monitoring requirements can be identified through the cave visitor impact monitoring program to be implemented throughout the life of the management plan.
113	30.3	The natural features of Crystal Cave could be better presented to visitors. An expert in cave lighting should be appointed for this purpose.	No (2h)	Advice noted. Such work would be consistent with the management plan.
114	30.3	Crystal Cave walkways need attention to minimise the risk of visitors stumbling.	No (2h)	Information will be considered by the district/park staff responsible for development of operational plans.
115	30.3	Crystal Cave needs to have the budget priority it deserves as one of the Park's major attractions.	No (2h)	Information will be considered by the district/park staff responsible for development of operational plans.
116	30.3	The Western Australian Museum has been in consultation with various traditional owner groups about the return of ancestral remains which were on display in Yonderup Cave. These were removed from display in 1984 at the request of senior Noongar	Yes (1b)	The plan has been amended to state that use of Yonderup Cave as a tourist cave will be subject to prior resolution of any cultural heritage constraints. Discussions will need to be held between the department, the WA Museum and other relevant stakeholders.

Comment Number	Section	Summary of Comment	Amended (Criteria)	Discussion
		spokesman, the late Mr Ken Colbung, and were brought to the museum for study to determine their significance. These remains consist of both complete bones and fragments representing at least 12 individual adults. There are no complete skeletons, and some of the bones appear to have been brought to the cave from another place. It is likely that the material from the cave is not more than a few thousand years old. Proposals for the return of these ancestral remains halted due to opposition from one Noongar spokesman. It is timely to reconsider various options which may ultimately include the reinterment of the remains in Yonderup. The Western Australian Museum Aboriginal Advisory Committee has endorsed the placement of the remains in the Keeping Place at Karrakatta. Discussions need to be held between the Department of Environment and Conservation, the Department of Indigenous Affairs Culture Branch, the South West Aboriginal Land and Sea Council and the Western Australian Museum.		
Overnight Stays				
117	30.8	Campervans and backpackers should be catered for, not seen as "illegal campers".	Yes (1b)	
118	30.8	Support for development of a caravan park in Yanchep National Park.	No (2a)	
119	30.8	A caravan park should be located close to attractions and activities and therefore a site should be within rather than outside of the park.	No (2e)	The plan provides for a caravan park to <i>potentially</i> be developed in the park.
120	30.8	A future caravan facility should not be limited to caravans and camping, but consider a mix of accommodation offerings including safari tent style accommodation.	No (2e)	
121	30.8	Some walkers have expressed concern about not being aware that the camping areas were so far away from the McNess Recreation Area. It is recommended that the position of campsites is more clearly communicated on brochures, websites etc.	No (2h)	Information will be considered by the district/park staff responsible for dealing with such operational matters.
Commercial Tourism Operations				
122	31	T and E Class licences and lease terms are currently subject to review as part of the department's implementation of the <i>Review of Nature Based Tourism</i> .	No (2i)	
123	31	It is recommended that staff at the entry gate are given more flexibility to waive entry fees in circumstances that are	No (2h)	Information will be considered by the district/park staff responsible for dealing with such operational matters.

Comment Number	Section	Summary of Comment	Amended (Criteria)	Discussion
		obviously directly related to the operation of business interests in Yanchep National Park.		
124	31	From a tourism perspective Yanchep National Park would benefit from marketing initiatives. Over time the strategic marketing of the park has diminished with this onus being left to commercial operators using the park - this in an environment of increasing rates of commission on turnover payable to the department. Initiatives targeted at attracting visitors during low/shoulder periods would support ongoing business continuity.	No (2h)	Information will be considered by the district/park staff responsible for dealing with marketing and commercial operations in Yanchep National Park.
125	31	Greater promotion of the existing \$20.00 Annual Park Pass would be beneficial in encouraging repeat visitation (especially by nearby residents) to the park.	No (2h)	Information will be considered by the district/park staff responsible for dealing with marketing of Yanchep National Park.
Bushwalking				
126	30.6	Walktrails which link the Bibbulmun Track to the coast (e.g. at Two Rocks or Guilderton) should be established.	No (2c)	The final plan includes a strategy which identifies a preference for trails which link to or complement other trails in surrounding areas. It is not appropriate to pre-empt if/what trails might be considered over the life of the plan and therefore specific reference to the Bibbulmun Track has not been included.
Visitor Safety				
127	32	Support comments on caving.	No (2a)	
128	32	Rotation of Yanchep National Park staff to other locations can pose a risk to visitors, particularly in the fire season when fully qualified staff may not always be on-site.	No (2d)	Information will be considered by the district/park staff responsible for dealing with such operational and staffing matters.
Part F: Managing Resource Use				
Mineral and Petroleum Exploration and Development				
129	34	The existence of mining tenements in the Ridges area and how the conflicting land uses will be managed/balanced needs to be discussed.	Yes (1e)	The plan has been amended to clarify that where there are competing land uses, proposals for reserve creation may be referred to the state government for a final decision. In such cases, decisions regarding conservation reserve creation are made by the government, taking account of the land use issues.
130	34	The plan must acknowledge that in the planned Ridges expansion of the national park there are a number of granted and pending mineral tenements, petroleum titles and areas under active geothermal exploration which would be extremely difficult to progress to development in Class A conservation estate. These must be accommodated for future extraction activities and should not be restricted by a Class A reserve. Access to high quality limestone in the Perth region is particularly restricted and the Department of Mines and	No (2e)	The plan has been amended to state that there are a number of tenements applicable to the proposed reserve additions, but the proposal to add the area to the conservation reserve system has been retained. The Ridges area is also a strategically important inclusion into the conservation reserve system. Granted mining leases M70/140 and M70/142 which occur within the Ridges area have been excluded from the proposed addition to Yanchep National Park at this stage. However, because the granted lease areas contain some of the best remaining examples of threatened limestone vegetation, consideration should be given to

Comment Number	Section	Summary of Comment	Amended (Criteria)	Discussion
		Petroleum considers any action that could potentially restrict access to this resource unacceptable.		including them in the national park if mining does not proceed. Amendments have also been made to clarify that where there are competing land uses, proposals for reserve creation may be referred to the state government for a final decision. In such cases, decisions regarding conservation reserve creation are made by the government, taking account of the land use issues.
131	34	The plan needs to recognise that Reserve 25253 which has been identified for conservation reserve has a pending mineral Tenement over it (M70/1160), and ensure that this is appropriately accommodated for future extraction activities.	Yes (1e)	Reference to this tenement has been included in the final plan. Crown Reserve 25253 was one of the areas identified for addition to Neerabup National Park in exchange for excisions required for the freeway and railway extension as part of a major MRS amendment in 2004.
Water Resources				
132	35	Paragraph 6 needs updating regarding the current cave supplementation and filtration systems in place.	No (2h)	
133	35	Strategy 3: The Department of Water will continue to monitor water levels at Loch McNess.	No (2a, 2c)	The department recognises the Department of Water's responsibilities in this regard and in relation to other water management issues in the planning area.
134	35	Strategy 4: The Department of Water manages water under the RIWI Act. There is limited water available for new licences in the groundwater area in which the planning area falls.	Yes (1e)	The plan has been amended to refer to the Department of Water's responsibilities regarding the RIWI Act.
135	35	Include a graph showing trends of water levels in Loch McNess as this would clearly communicate the impacts on groundwater levels from abstraction and reduced rainfall.	No (2e)	Graph not included given current preferences for shorter, more concise management plans. Loch McNess is only one of the wetlands in the planning area. The plan includes references to other document that include detailed explanation of declining water levels.
Beekeeping				
136	36	To make apiary site 5271 unavailable from July to December (because of environmental weeds) would adversely affect our beekeeping business as this is when we use the site. The likelihood of the unspecified weeds being eradicated is very low with or without the presence of bees.	No (2f)	It is recognised that the constraints referred to create difficulties and concerns for apiarists. However, given uncertainties about the conditions under which honeybees leave a hive and become feral, the department must take a precautionary approach with regard to beekeeping in conservation reserves. The submitter is encouraged to contact DEC's Apiary Site Coordinator to see if an alternative site can be accommodated.
Pollution and Waste Management				
137	38	The last septic system constructed in the park (2009) is just 17 metres from a cave previously the home of rare root mat communities and which is connected with Loch McNess. Before more septic systems are installed local health authorities and hydrologists should be consulted.	No (2g)	No new septic systems have been installed. New facilities have been connected to another existing system which was enlarged, while an old system to the west was decommissioned. Septic systems will be progressively upgraded to non-leaching systems over the life of the plan, or the park's systems will be connected to reticulated sewerage if that becomes available.
Part G: Involving the Community				
138	39	Further opportunities for interpreting karst and karst features	No (2h)	Suggestion noted. The plan provides some examples of interpretive

Comment Number	Section	Summary of Comment	Amended (Criteria)	Discussion
		should be explored, not just those specified in Table 14.		themes and sites. More comprehensive consideration is given during detailed interpretation/communication planning which occurs throughout the life of the plan.
139	39	This should include the speleological community and mention the speleological groups and ACKMA and ASF.	No (2e)	There is a wide range of interest groups with whom the department engages and it is not feasible or necessary to list them all.
140	39	Paragraph 3 on page 79 should emphasise the linkages of the groundwater theme to outside the park.	No (2i)	
Research and Monitoring				
141		This section should include more items relating to karst and cave hydrology in Yanchep National Park.	No (2c)	This topic is sufficiently covered elsewhere in the plan.
143		The statement that monitoring the water quality of Loch McNess to ensure it continues to meet Australian Drinking Water Standards needs correcting.	Yes (1e)	Error corrected.
144		Abstraction bores across the Gngangara Mound and within the planning area with a licensed entitlement greater than 50,000KL are required to have a meter installed. The Department of Water is currently undertaking a number of studies to support the next Gngangara groundwater areas allocation plan which will consider environmental water requirements relevant for a changing climate.	No (2b)	
145		Include biodiversity monitoring (e.g. ducks, turtles etc.).	No (2i)	Comment no longer applicable as text in question has not been retained in the more concise final plan.