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This document has been prepared by GSCORE on behalf of the following regional stakeholders – City of Albany, the Shires of Broomehill-Tambellup, Cranbrook, Denmark, Gnowangerup, Jerramungup, Katanning, Kent, Kojonup, Plantagenet, and Woodanilling; the Department of Biodiversity, Conservation and Attractions (DBCA); the Department of Local Government, Sport and Cultural Industries (DLGSC); and the Great Southern Development Commission (GSDC).

GSCORE acknowledges all those who have contributed their time and expertise towards the development of the Great Southern Regional Trails Master Plan.

We recognise and value the heritage, culture and spiritual connection of Noongar people with the lands and waterways on which outdoor recreation takes place.

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INTRODUCTION AND BACKGROUND

This document collates all the submissions received by the Great Southern Centre for Outdoor Recreation Excellence (GSCORE) during the five-week public comment period on the draft Great Southern Regional Trails Master Plan (RTMP) conducted between 16 December 2019 to 19 January 2020. A response to the feedback is provided below. This response is intended to provide a high-level analysis of the most prominent themes and issues. All feedback has been provided to land managers and trail managers for review and consideration. It should be noted that some submissions include factually incorrect information. These have not been corrected and therefore caution should be exercised before citing the views or comments contained in the submissions.

COMMUNITY ENGAGEMENT OVERVIEW

The public comment period represents the third round of community consultation undertaken in drafting the RTMP. During our first round of consultation we spoke with communities and trail users in order to identify their aspirations for trails and what the Great Southern Regional Trails Master Plan needs to achieve. In our second round of consultation we asked communities to help us better understand and balance different opportunities and challenges so that we could recommend trail proposals to land managers and funding agencies. In the third round of consultation we circulated the draft proposal for broad-scale community input. The feedback received during the public comment period has helped us to review the findings of the earlier consultation and refine the trail proposals.

SUMMARY OF KEY FINDINGS



FEEDBACK ON THE PROJECT OBJECTIVES AND PRINCIPLES

Overall, we heard that the objectives and principles we've developed for the Great Southern Regional Trails Master Plan are supported by the community. You told us that trails are valued and needed, and sound planning is required.



FEEDBACK ON THE COMMUNITY ENGAGEMENT PROCESS

While many respondents appreciated being involved in the planning process, some were concerned that they did not participate in earlier rounds of consultation. Others expressed frustration with the slow progress of moving from planning to construction.



KEY FEEDBACK ON THE TRAIL PROPOSALS

While we received lots of positive feedback on the plan, we received a significant number of submissions raising concerns about trail proposals in national parks and nature reserves. You told us that you want assurance that land managers are taking an environmentally sensitive approach to planning.



THEME 1: TRAIL SUGGESTIONS

COMMUNITY FEEDBACK	PROJECT RESPONSES
We heard from a number of people who want to see improved maintenance of existing hiking trails	We agree. The region has an extensive hiking/walking trail network, including trails of national and regional significance. The RTMP identifies the maintenance of existing trails as a critical part of the implementation process.
We received a few suggestions for new trails or trail connections (including to areas outside of the Great Southern), as well as areas you thought we had missed.	The master plan was developed over nine months using a combination of face-to-face and online consultation. We received suggestions for over 220 different trail ideas from across the region. All of the trail ideas suggested during the public comment period were raised in earlier rounds of consultation. The short list of priority projects was developed by the Project Management Executive Group using a rigorous multi-criteria assessment (MCA) tool. All the trail suggestions raised during the public consultation period were considered as part of the MCA but were assessed as being of lower order priority. Some of these trail ideas may be included in local trail plans or integrated into regional trail networks in the future.
We received a few comments on the need to integrate existing trail networks and address gaps or problems with exiting paths and trails.	We agree. The RTMP seeks to make the most of the region's existing trail supply by developing trail networks. We also recommend that land managers consider opportunities to develop trail networks in local trail plans.
We heard from a number of people who want to see strategies to address the creation of unsanctioned trails.	We agree. Unsanctioned trail construction and use is damaging to the environment, compromises the safety of trail users, and leads to poor trail user experiences. The RTMP calls for the creation of new sanctioned trails to cater to the needs of different groups, and the closure and rehabilitation of unsanctioned trail networks.
Several submissions suggested that the term 'dual-use' is inappropriate for trails that are unlikely to be used by hikers.	Dual-use trails can serve a number of purposes, including providing local residents with walking opportunities close to where they live. While these may not be favoured by bushwalkers, they are a valuable community asset for cycling, walking, and running. Multi-use trails may also be enjoyed by horse riders.
We heard from several people who suggested that firebreaks could be used by mountain bike riders, thus avoiding the need to build new trails.	Trail design principles vary for each project, depending on the aim of the trail/ trail network and the constraints. While some trail projects can utilise existing disturbances, others require new construction to best manage constraints and provide the type of experience sought by different cyclists. In the main, the surface, gradient, width and location of firebreaks are unsuitable for mountain biking and the RTMP therefore recommends the construction of new trails where appropriate. Regular clearing of firebreaks by machinery disturbs the track tread, making it unsuitable for riding.



THEME 1: TRAIL SUGGESTIONS CONTINUED

We heard from large number of people who felt that instead of building mountain biking trails in national parks and nature reserves, the RTMP should only recommend the construction of mountain bike trails on private land.

The Great Southern has very few sanctioned mountain bike trails, which is insufficient to meet demand. This includes a lack of downhill, cross-country, all mountain, and touring trails. Mountain biking is one of the fastest growing recreational, sport and tourism activities in Western Australia. Almost 120,000 mountain bikes are purchased every year in WA, with 19% of Western Australia's owning a mountain bike.

GSCORE supports mountain bike trails on private land, however, private recreation facilities are established to generate a commercial return and private investors will make decisions about where to invest based on profit forecasts. Small-scale trail networks such as those proposed in the RTMP, and certain styles of trail development (e.g. cross-country, touring) are generally not profitable.

Private MTB parks can address supply for downhill or all mountain trails where they are built near large catchment areas (e.g. close to metropolitan centres), where there is existing supporting infrastructure (e.g. existing uplift services such as ski-resorts), or where there is sufficient length of trail to attract visitors (at least 80-150 km of purpose built single track).

Private MTB parks do not provide the entire solution to meet local demand because user-pay systems create barriers to participation for disadvantaged communities, low income households, and young people. This is why all tiers of government support the creation of public spaces for sport and recreation. Most public land suitable for MTB trails occurs within national parks and reserves.

We received a number of submissions from horse riders who would like to see dedicated bridle trails included in the regional trails master plan. In developing the RTMP, GSCORE commissioned a Feasibility Study on Bridle Trails by an expert trail consultant. This study revealed that there is currently insufficient demand for the creation of regionally significant bridle trails (i.e. trails that have the capacity to attract visitors to the region). However, there is strong demand for local bridle trails. We have therefore recommended that all local governments consider incorporating bridle trails into their local trail plans and actively work with equestrian groups to address the needs of local riders.

We received several submissions from horse riders who use the Stidwell Bridle Trail expressing concern about environmental damage and safety concerns associated with motor bike and four-wheel drive vehicles accessing trails in the Sand Patch area.

We note these concerns and have referred them to the City of Albany (the land manager). We acknowledge the need for safe bridle trails and the problems associated with multi-use trails in this area.

Several submissions queried the status of the Kinjarling Trail.

The Kinjarling Trail and Stories Strategic Plan (2010) outlines a proposed trail network along Albany's waterways that incorporates Noongar stories and culture. We recommend that the new proposed dual-use trails between the City of Albany and Frenchman's Bay/Torndirrup National Park integrate Noongar cultural interpretation in order to realise the Kinjarling vision.

THEME 2: ENVIRONMENTAL VALUES

COMMUNITY FEEDBACK

PROJECT RESPONSES

Communities across the region wanted to know how we are addressing the potential environmental impact of trails. We heard that you are concerned about erosion, soil compaction, weeds, vegetation damage, littering, water contamination, and dieback.

Building sustainable and safe trails is a key planning principle for the RTMP. Our goal is to see the trail network built to a high standard and managed on a sustainable basis to enhance environmental and educational outcomes.

To achieve this vision, we have adopted the eight-stage planning process outlined in the Trail Development Process (TDP), which provides best-practice guidelines for trail planning, construction and management.

The TDP recommends the use of an assessment tool to monitor the environmental impact of any proposed trails (Appendix B: Impact Evaluation Checklist). This is based on the Department of Biodiversity, Conservation and Attractions (DBCA) assessment requirements for environmental impacts from trails. A wide range of issues are covered, including dieback, erosion/drainage, flora, fauna and unique environmental communities and habitats. Assessing environmental impacts and approvals is the responsibility of the relevant land owner/manager.

We received lots of comments about the need to protect the region's biodiversity, including threatened flora and fauna species, vegetation communities and ecosystems. We agree. The region is internationally recognised as a world biodiversity 'hotspot' which is a major visitor drawcard. Threatened Species Recovery Plans, management plans and strategies will be used by land managers to ensure that biodiversity protection is maintained. Any new trail development will need to include an environmental impact assessment as outlined in the TDP.

All existing and proposed trails should be managed to protect and enhance biodiversity values. Trails can be a management tool by providing managed access into conservation areas, where people otherwise may cause damage when walking/trampling across sensitive sites. They provide opportunity for nature appreciation and education, which may be difficult to communicate to target groups through different means.

We heard from several people who were concerned about the potential spread of dieback (*Phytophthora cinnamomi*) by:

- a. Land managers and trail builders are very mindful of the need to adopt strict hygiene protocols in the construction and maintenance of trails. DBCA has developed management guidelines, protocols, and Green Card training to help prevent the spread of dieback. Dieback assessment is integral to all site assessments for trail planning and construction, and a variety of techniques have been used with success to address the spread of dieback in many locations in the Great Southern.
- Machines used during the construction of trails
- Land managers are using a variety of techniques to address the potential spread of dieback along hiking and cycling trails. This includes avoiding trail construction in sensitive areas, boot and tyre cleaning stations, and
- b. Trail users (hikers and cyclists)
- trail construction in sensitive areas, boot and tyre cleaning stations, and bike washdown stations. We anticipate that these types of techniques will be used along trails outlined in this plan. These decisions will rest with the land owner/manager based on a dieback assessment at each proposed site.

We heard from a few people who were concerned that large machines would be used to construct trails and that this would cause significant damage.

Large machines are rarely, if ever, used in trail construction. Trails are generally built to a maximum of 1.2 metre width, using a narrow footprint. This is either with hand tools or small machines may be used in areas where the topography is suitable, or the area has already been disturbed or cleared.

THEME 2: ENVIRONMENTAL VALUES CONTINUED

We received numerous comments from people who stated that while they are supportive of mountain biking, they do not wish to see cycle trails established in national parks or nature reserves, including the Porongurup National Park, the Stirling Range National Park, and Mt Hallowell Nature Reserve.

Comments included:

- National Parks/Reserves are established for conservation, not recreation or attractions
- b. National parks are for passive recreation not active recreation
- Mountain biking is environmentally damaging
- d. Mountain biking interferes with the quiet solitude of hiking
- e. Mountain biking leads to additional visitor load
- f. There is a current lack of resources to manage national parks and reserves

We acknowledge that not all members of the community are supportive of new trail development in national parks and nature reserves. Land managers will continue to work with the community to assess the opportunities and constraints associated with the development of any proposed new trails in these areas.

- a. The national parks and nature reserves selected as possible sites for MTB trails have been chosen because their management plans permit trail-based activities within designated recreation zones. Before any projects can proceed, these management plans will need to be reviewed to consider the inclusion of cycling-specific trails. Some types of reserve have higher conservation values and are generally not suitable for MTB. Downhill MTB is conditionally compatible in national parks, subject to the area's conservation, heritage and social values.
- b. All of the national parks and nature reserves included in the plan currently permit active recreation, including hiking and rock-climbing.
- c. All trail development requires a detailed environmental impact assessment. Good trail planning, design, construction and management can mitigate potential environmental damage. Environmentally sustainable trails have been built all over the State, including hiking and MTB trails, and both have the same impact.
- d. Single track MTB trails designed and built separately from hiking trails as is proposed in the RTMP ensures user safety and enjoyment. There should be suitable trails for all users, hikers and mountain bikers
- e. All trail development requires a management plan that identifies how visitor load and dispersal is managed. This could include parking limitations, park fees, and restrictions on events. Visitation is managed the same for any new trail or attraction.
- f. All trail development requires a management plan that includes how the trails will be maintained. This is included in the Trail Development Series and WA Mountain Bike Guidelines

All of the management plans permit trail-based recreation and cycling on

A number of submissions noted that management plans for the Stirling Range and Porongurup National Parks, and Mt Hallowell Reserve do not permit mountain biking or other forms of cycling, and therefore the trail proposals should not proceed.

A number of submissions asserted creating MTB trails encourages irresponsible behaviour by MTB with any future trail plans.

We disagree. Evidence from other locations demonstrates that unsanctioned trail construction or riding on undesignated trails (e.g. walk only trails) is reduced when purpose-built trails are constructed for mountain bikers.

public roads. The Stirling Range and Porongurup National Park Management Plan recommends that the land manager consider a designated MTB path in the Porongurup NP, and a cycling trail in flatter areas of the Stirling Range NP. The Mt Hallowell Reserve Management Plan does not include reference to cycling and this would need to be considered by Council before proceeding with any future trail plans.



riders.

THEME 2: ENVIRONMENTAL VALUES CONTINUED

We heard from a number of people who raised concerns about the impact of cycling trails on threatened species in the Albany Heritage Park.	The City of Albany is the land manager for the Albany Heritage Park. The City has conducted extensive surveys on threatened species in the park and is continuing to conduct these surveys in order to ensure that any proposed trail development minimises impacts on, or avoids areas known to contain threatened species.
We heard from a number of people who were concerned ongoing funding to maintain trails.	In accordance with the TDP, all trail development requires a management plan that includes how the trails will be maintained. The RTMP identifies a number of different management and maintenance structures, including the use of volunteer maintenance crews such as those that support the Bibbulmun Track and Munda Biddi Trail.
We heard from a few people who were worried about the environmental impact of adventure bike riding.	Adventure bikes are licensed road bikes used for long-distance touring on sealed and unsealed roads. They use road systems, not trails. The RTMP does not focus on mechanised bike riding, but recommends that a network of adventure bike itineraries (similar to drive itineraries for 2WD vehicles) be considered.

THEME 3: SOCIAL VALUES

COMMUNITY FEEDBACK	PROJECT RESPONSES
We heard from property owners and residents who live close to the Porongurup National Park who were concerned about the possible impact on their lifestyles or livelihoods as a result of mountain bike trails. The issues raised include visual impact, noise impact, property security, compromised privacy, farm biosecurity, diversion of water resources, and emergency access.	 Trail development has the potential to attract new visitors to the region. This may result in an increase in the number of visitors to different towns and localities. (a) In relation to the impact on lifestyles – local governments play a role in destination management through traffic control, zoning regulations, and planning approvals; and land managers play a role in managing the impact of trail visitation through land management plans which are developed in consultation with community. (b) In relation to the impact on adjacent landowners in the Porongurup National Park - if the trail proposal goes ahead, the land manager (DBCA) is required to consult with adjacent landowners to discuss their concerns.
We heard from a number of people who expressed the view that mountain bike trails would cause damage to Aboriginal cultural landscapes and/or Aboriginal heritage sites.	We undertook three rounds of community consultation to develop the draft RTMP. This included opportunities for members of the community, including Aboriginal people, to comment on the cultural significance of existing trails, landscapes and built features. The shared vision of the RTMP stakeholders is to showcase the region's unique biodiversity, landscapes, Aboriginal culture and settler heritage. The RTMP is a high-level strategic document. Detailed planning, including community and Aboriginal consultation is the responsibility of each land manager. Aboriginal heritage assessments are an essential part of all site
	assessments for trail proposals in order to avoid potential damage to heritage sites. Traditional owners will continue to be consulted throughout the trail development process.
We heard from several people who argued that the stated goal of integrating Noongar culture and creative expression into trail design and interpretation is disrespectful or patronising.	We disagree. This planning principle was proposed by Noongar people and discussed with Aboriginal organisations and Elders, all of whom were supportive with the caveat that traditional owners would have the final say in what stories are shared.
We heard from several people who advocated for an Aboriginal naming convention for new trails.	We agree. One of the RTMP planning principles is the use of Noongar language or dual-naming of trails. We encourage land owners/managers to engage with traditional custodians throughout the trail planning process and to consider Noongar language for all new trails, and dual-naming for existing trails.

THEME 3: SOCIAL VALUES CONTINUED

Some of you commented on the potential for user conflict and/or compromised safety on dual or multiuse trails. However, others did not see conflict as an inherent problem with dual or multi-use trails.	The issue of dual or multi-use trails is a contentious one. Some trail communities in Australia and internationally report limited conflict when different trail users (e.g. walkers, cyclists, horse riders) share trails. In other locations, user conflict appears to be common. Evidence suggests that conflict can be minimised and safety enhanced through clear signage and public education campaigns. The RTMP recommends dual-use or multi-use on relatively flat trails with good lines of sight (e.g. rail trails) or on uphill sections (e.g. where cyclists must dismount or are forced to slow-down because of the gradient). In other cases we recommend the construction of single track. The type of trail use is by designation which is subject to it being suitable for the proposed use. Designated dual-use trails tend to not be controversial as people use it with the expectation of sharing. The problem is generally with single-use trails that are being used by unauthorised groups.
Many commented on the positive benefits of trails for engaging young people and providing things for kids to do close to where they live.	We agree.
Some of you emphasised the important health benefits of encouraging trail use and having trails close to where people live.	We agree.
A few people commented that sanctioned mountain bike trails are important for elite athlete progression.	We agree. Although the focus of the RTMP is on community and economic development, trails can also play a role in sports development.
We received some comments asserting that unlike hikers, MTB riders don't enjoy the environment, don't care for the environment, and/or are disrespectful.	Many individuals enjoy multiple outdoor recreation pursuits. For example, many hikers also enjoy mountain biking. It is a misperception to describe one trail user group as more respectful or environmentally aware than another. Bad behaviour can be exhibited by all types of trail users. One of the appeals of mountain biking is the appreciation of nature.

THEME 4: ECONOMIC VALUES

COMMUNITY FEEDBACK	PROJECT RESPONSES
We received many comments on the positive benefits of trails for attracting visitors and growing local and regional economies. However, a number of people were also concerned about the negative impact of tourism on resident lifestyles. In the case of the Porongurup trail proposals, we received several comments from people who argued that the business community has no desire to see the local economy grow.	Trail development has the potential to attract new visitors to the region. This may result in an increase in the number of visitors to different towns and localities. All of the trail proposals are located in areas with an established tourism economy in order to ensure that visitors can take advantage of existing accommodation and tourism services. Partnerships between destination marketing organisations and local governments will help to address problems associated with low occupancy and seasonality, support workforce development, create jobs, and support stronger local economies.
Some of you highlighted a desire to see local jobs and business opportunities emerge from trail projects.	We agree. We recommend that land managers ensure that local content policies are built into all tender contracts for trail construction and maintenance. GSCORE is working with our regional stakeholders to provide trail building training programs to upskill existing businesses and develop a trail-ready workforce.
Some of you were excited about the opportunity to link events, festivals and business opportunities to trails.	We agree. Trails are only one part of the visitor experience. To make the region an attractive destination, we need to build events and experiences that capitalise on our trail infrastructure.

THEME 5: PLANNING PROCESS

COMMUNITY FEEDBACK **PROJECT RESPONSES** The RTMP provides a brief summary of target markets and user demand. We received a few comments stating that the RTMP does not provide A detailed analysis of these markets is contained in the Trails Background evidence of any demand for trails (i.e. a Report (www.gscore.com.au) and in each of the Priority Trail Plans business case for trail development). prepared by the expert consultants. We received a number of submissions This assertion is incorrect. While this is a high-level strategic planning that asserted that the process of document, some effort was made to rule out areas with high conservation identifying locations for trails did not values. Final decisions to proceed to trail specific planning will entail take into account environmental, detailed environmental and heritage surveys and considerations. In cultural or planning constraints or the process of developing the plan, a review of environmental, cultural and other planning constraints was completed. As is the case in the management plans. development of other trail master plan (e.g. Peel Regional Trails Master Plan, South West Mountain Bike Plan), this information informed the multi-criteria assessment process that led to the identification of priority projects. Only projects that have the support of land managers to take the proposed trail to the next stage of planning have been progressed to inclusion in the RTMP. The progression from the RTMP to actual trail development will be subject to outcomes of future trail specific consultation and environmental and heritage surveys. In relation to the Mountain Bike These comments are based on a misunderstanding of the significance of Proposals, we received a number the case study. MTB trails are often developed as single destination sites (e.g. Derby, Whistler) where visitors base themselves in one town and of submissions that stated that the don't travel to other locations. Single destination sites require long trail example of the "Seven Stanes" was not applicable because the Scottish networks (approx. 100 km) to be successful. landscape is different to the Great In contrast, the Seven Stanes is an example of an integrated trail network Southern. that consists of seven separate mountain trail hubs. Each of these trail hubs (each 'stane') is marketed under the one brand experience. Instead of basing themselves in one location, users travel to one or more of these trail hubs to experience different styles of mountain biking. The RTMP proposes a similar type of integrated trail network consisting of five trail hubs, each with a small length of MTB trail (5-20km each). These five trail hubs would offer different styles and grades of mountain biking but would be promoted as one visitor experience. A few submissions asked us to clarify In accordance with the TDP, the first step in trail planning is to identify the why detailed environmental assessment opportunities and constraints that impact any new trail proposals. This occurs through an analysis of relevant management plans, feasibility occurs after master planning, rather than before. studies, user demand studies, and land manager support. Environmental constraints are assessed based on a desktop survey and land manager



input. The output of this assessment - Stage 1 (Master Plan) - represents an agreement by stakeholders to continue to the next stage of the TDP

and undertake a detailed environmental assessment.

THEME 5: PLANNING PROCESS CONTINUED

A number of submissions asked why GSCORE is identified as the project lead for the implementation strategy.

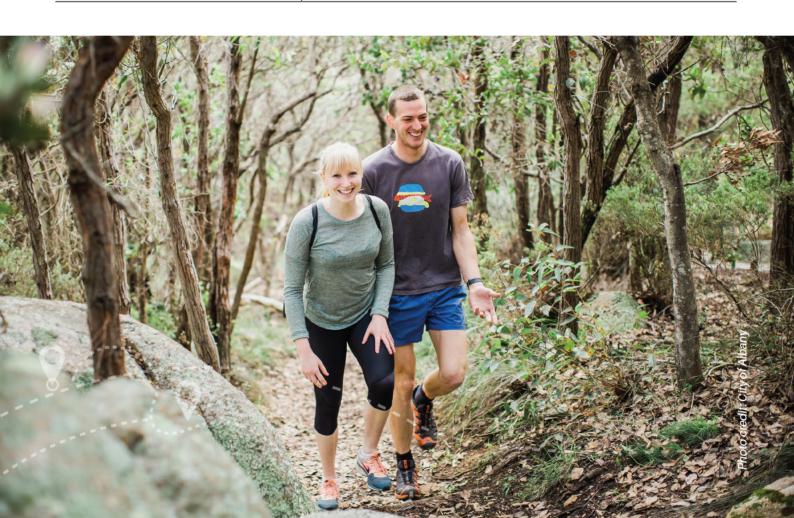
The RTMP Stakeholder Reference Group recommended GSCORE's role as project lead in implementing the RTMP based on our role as initiator and project manager of the RTMP, and our status as the regional peak body representing the outdoor recreation and nature-based tourism sectors. The Stakeholder Reference Group has indicated that some LGAs do not have the capacity or skills to lead the implementation strategy and consider GSCORE is best placed to do this. Individual trails may be developed with assistance of GSCORE and others will be managed by the land manager.

We received a number of submissions suggesting that more Noongar engagement is required before the RTMP can be finalised.

GSCORE has undertaken extensive consultation with Noongar communities across the Great Southern throughout the project. A representative of the South West Aboriginal Land and Sea Council (SWALSC) and from the Wirrpanda Foundation sit on the project Stakeholder Reference Group. Aboriginal people and representative organisations have participated in each of the three rounds of community consultation undertaken in the development of the RTMP. As with all communities, there are diversity of views amongst Aboriginal people about the trail proposals outlined in the RTMP. Consultation with the Noongar community is required at all stages of the TDP and is a requirement for projects on DBCA estate.

Some writers expressed frustration that the RTMP does not provide detailed designs for each trail.

The Trail Development Series provides the best practice approach to strategic planning for trails. Stage 1 (Master Planning) is a high-level strategic planning document. Detailed design can only occur after site assessments (Stage 3), concept planning (Stage 4), and corridor assessments (Stage 5).



HOW WAS THE FEEDBACK MANAGED?

Following the period of public comment, all feedback was reviewed by the Project Management Executive Group and discussed with the relevant land manager. The master plan was amended according to the criteria outlined below.

The master plan was amended if a submission:

- · provided additional information of direct relevance to the development of a trail or trail networks
- indicated omissions, inaccuracies or a lack of clarity.

The plan was not amended if a submission:

- · clearly supported proposals in the plan
- · made general or neutral statements or no change was sought
- · referred to issues beyond the scope of the plan
- referred to issues that are already noted within the plan or already taken into consideration during its preparation
- has the support of the land manager/s at this stage of the plan
- was one among several widely divergent viewpoints received on the topic but the approach in the plan is still considered the best option
- contributed options that are not feasible (generally due to conflict with legislation or government policy)
- · was based on unclear or factually incorrect information.

Next Steps

In accordance with the 8-Stage Planning Framework outlined in the Trail Development Series, community engagement will continue to play an important role in planning for the trail proposals outlined in the Great Southern Regional Trails Master Plan.

Notes

Submissions are sorted according to date of receipt. Each submission has been provided with a unique identifying number (ID). Except for submissions received by organisations or public persons, all identifying information (names and addresses) has been redacted to maintain anonymity. In some cases, this has required additional redaction where the respondent could be identified by other comments they have made. Where an individual has made more than one submission, they have also been given a respondent ID. Several submissions were received after the public comment period closed. The Project Management Executive Group has chosen to include the late submissions.



