

This document is a submission to the NSW Department of Planning and Environment by Roger Wood OAM.

It relates to the **Environmental Impact Assessment Modification Report** about the **Temporary Intensification of Operations at the Moonimba Borrow Site** for the supply of rock to the Woolgoolga to Ballina Pacific Highway Upgrade.

Roger Wood OAM is chairman of Community Radio Coraki Association Incorporated, aka 88.9 FM.

88.9 FM is a not-for-profit, registered charity operated entirely by volunteers.

Preamble

I recognise the immense benefits and the necessity of the Woolgoolga to Ballina Pacific Highway Upgrade. I applaud the associated work of both governments, its contractors and their workers.

Everything stated in this submission is intended as constructive criticism to benefit the community, the two governments, the contractors, the workers, Community Radio Coraki Association Inc and the communication workers who frequent the various radio communication facilities on the peak of Mount Moonimba.

Nothing stated here is intended to represent 88.9 FM, rather I have written as a member of a well-established community organisation with a stake in operations at Mount Moonimba.

Background

88.9 FM is licensed by the Australian Communications and Media Authority to broadcast to the community and to receive a radio link from its studio at Woodburn.

88.9 FM has been licensed to broadcast from the peak of Mount Moonimba since August 1999. Initially, antennae were attached to the Vodafone mobile phone tower and a transmitter cabin was built immediately below the tower.

In December 2015 all the transmission equipment was moved from the Vodafone tower to a point 30 metres to the North, on land owned by and with the blessing of Noel and Kerry Newman.

The Newmans have signed "an intention to lease document".

The land intended for lease has been surveyed. Community Radio Coraki Association Inc will enter a lease with the Newmans in the near future.

There are many radio transmission towers on the very top of the mountain. The tallest, at 50 metres, is owned by Axicom Pty Ltd (nee Crown Castle Pty Ltd). It is a solid lattice tower, erected on land adjacent to Noel and Kerry Newman's land. It is home to Vodafone, Telstra, Optus, and the NSW Rural Fire Service.

The next tallest at 38 metres is owned by Northern Rivers Communications Pty Ltd. It is a guyed tower erected on land owned by the Newmans. It is bristling with communication antennae – perhaps 30, including those of Richmond Valley Council, several NSW Government Services and Newman's Quarries Pty Ltd.

The other, at 27 metres, is owned by 88.9 FM. It is a single concrete pole of the type employed by high voltage electric power distributors. It is placed in 3 metres of rock and rammed with quarry dust. Even though its design is for stand-alone use, it is guyed three times from two different levels.

Concerns

Whilst I have some concerns as a daily user of the Coraki-Woodburn Road and as a weekly user of Reardon's Lane and Boggy Creek Road, I believe that the Modification Report has dealt with motor vehicle movements sufficiently, given the way current operations from other quarries are managed.

However, I am concerned for the effects that the quarry leaseholder's operations may have upon all of the radio communicators, including 88.9 FM.

Those concerns are:

*The proposers have failed to consult with 88.9 FM as a radio communication stakeholder with significant capital investment on the mountain; and

*Bushfire – always a concern on the mountain but the proposal would increase the probability many times; and

*Rock-blasting.

*Mission-critical access.

Lack of Stakeholder Consultation

I became aware of the two Woodburn public meetings, via an unintended circuitous route on the morning of the first meeting at Noon on the 14th of September. I attended that meeting, as well as the second meeting on the 18th.

Clearly, 88.9 FM has had no opportunity to call a general meeting of its members, discuss our concerns and make a submission to the Department as Moonimba stakeholders or as members of the public.

I predict that the Department will receive very few submissions from Moonimba stakeholders. The rest of the group of the Moonimba radio communicators are probably unaware of the proposed quarry operations.

The general manager of Richmond Valley Council – Vaughan McDonald - was unaware of the meetings until he was asked by an 88.9 FM announcer (off-air) on the morning of the second meeting (Monday, September the 18th): will council attend?

I would be very disappointed should this submission be rejected out-of-hand because it is singular in its concerns. Perhaps a telephone hook-up discussion between 88.9 FM's executive and representatives of the department and W2B people could provide a positive outcome for everybody.

Whilst we are unable to provide facilities to accommodate perhaps 10 people, I believe that W2B would be able to do so. We would even travel to Grafton from Woodburn to attend such a meeting.

Bushfire

88.9 FM's transmission facility is 350 metres South-East and uphill from the Eastern Pit.

There is no evidence of fire on the Mountain for at least the past 20 years. I have travelled to the top of the Mountain on a weekly basis for the past eighteen years. Many tonnes of extremely dry litter lies on the forest floor.

Given the effects of Climate Change, the maximum temperature on Mount Moonimba of 45.6 degrees last February and the fact that the most dangerous local wind direction for bushfire is from the North-West and uphill, I am extremely concerned about bushfire.

88.9 FM has recently installed reflective steel screens to protect its transmission cabin from the radiated heat of a bushfire and the sun's heat. More screens are necessary to protect the coaxial cables on their path from the cabin to the tower from bushfire.

I note with much concern that under section [3.4 OTHER ENVIRONMENTAL LEGISLATION](#) of the [Environmental Impact Assessment Modification Report](#), amongst the list of "of approvals that generally apply under other NSW legislation are not required for State significant infrastructure approved under Part 5.1 of the EP&A Act (EP&A Act s.115ZG)", the following is included:

A bushfire safety authority under section 100B of the Rural Fires Act 1997.

Not being a student of environmental legislation, I am unable to decipher the intended meaning of the statement.

Has any qualified person evaluated the danger of bushfire on the mountain during Summer? What of the danger to people and infrastructure in the pit and above the pit?

What of the danger during bushfire of explosives and diesel stored at both pits and diesel at 88.9 FM's facility?

Several of 88.9 FM's members are seriously qualified (via the RFS) bushfire fighters. Their consensus is to perform hazard-reduction burns on the mountain now with a view to protect every worker and all infrastructure on the mountain.

They also recommend road maintenance for the last 900 metres of the track to the top, so that communication workers can escape rapidly. It is very difficult and very slow to traverse. I understand that its maintenance is Axicom Pty Ltd's responsibility.

Blasting effects on towers

I am concerned that two years' adjacent blasting could fell the 88.9 FM tower.

I am also concerned that the 50 metre tower could similarly fall across our lease land destroying our tower and infrastructure.

Has any appropriately qualified person considered these possibilities?

Insufficient time to study the Modification Report

The time needed to read, consider, discuss with other members of 88.9 FM and act on the Modification Report is much less than the time afforded us. Accordingly, we seek more submission time. How much? Another week past the deadline, perhaps? Or the telephone meeting suggested earlier in the submission.

Mission-Critical Access

I am sure that W2B administration will do it all it can to assist travel by communication workers 24/7 through the edges of the Eastern pit. However there needs to be a clear understanding by the quarry contractor that there will occasions when time is of the essence for communication workers and delays at locked gates and document reading and writing must be avoided.

Escape from bushfire for all workers is the most mission-critical of all access considerations.