

This submission is by Stuart Walker of 3/62 Beecroft Road Beecroft NSW 2119 to NSW Department of Planning and the Environment.

My submission relates to the Environmental Impact Assessment Modification Report about the Temporary Intensification of the Moonimba Borrow Site for the supply of hard sandstone material for the Woolgoolga to Ballina Pacific Highway Upgrade.

The submitter Stuart Walker works in the radio communications industry and specialises in communication site analysis and is also the Treasurer for Community Radio Coraki Association Incorporated (88.9) with the radio call sign Richmond Valley Radio 88.9 FM.

Community Radio Coraki Association (88.9) is a not for profit registered charity operated by volunteers. As one of the volunteers I regularly travel to and from the broadcast facilities and that includes technical assistance for the maintenance of the transmitters and associated infrastructure on Mt Moonimba.

PREAMBLE

It is recognized that the Woolgoolga to Ballina Pacific Highway section upgrade will bring the ultimate completion of the Highway upgrade closer. The timely completion of this section of the highway upgrade will bring many benefits to the economies of New South Wales and the National Economy.

The efforts of the State and Federal Governments and the Contractors and their workers are to be applauded for their efforts in bringing the Pacific Upgrade to fruition.

My submission is to put forward to the reviewers a number of issues with which I have concerns. I am raising these concerns as they do not appear to have been addressed in the information so far made available to members of the public who may wish to comment on the Environmental Impact Assessment Modification Report for Moonimba Borrow site.

My submission is not on behalf of or intended to represent Community Radio Coraki Association (88.9 FM), although 88.9 FM is licensed to broadcast from the peak of Mt Moonimba by the Australian Communications and Media Authority and has a standalone transmitter tower and associated equipment structure on the mountain.

The points raised are to obtain clarification of matters about which the EIS is silent.

CONCERNS

The concerns I have are as follows:

- Bushfires in and around Mt Moonimba.
- Access to critical communication infrastructure on Mt Moonimba.
- Rock blasting – geotechnical report on the effects from frequent rock blasting.
- Effects on native fauna known to inhabit the area.
- Insufficient time to allow for community consultations.
- Lack of apparent consultation(s) with affected stakeholders.

Located approximately 350 metres South-East and uphill from the eastern pit are a three communications towers. The closest tower is owned and operated by Northern Communications and is a guyed lattice tower of approximately 37 metres. 88.9FM has a tower approximately 100 meters

further to the South. The major facility is the steel free-standing tower known as the "Vodafone Tower". All of these facilities provide critical communications.

The following are located on these structures: NSW Government radio, NSW Rural Fire Service, Ambulance NSW, SES and NSW Police. Vodafone, Telstra and Optus also provide mobile phone cells covering the highway and surrounding areas from Woodburn to south of Tabbimobil. 88.9 FM is an active communicator with the public especially in times of severe weather, bushfire and other major incidents. 88.9 FM has an average listening audience of approximately 20,000.

Bushfire.

There is no evidence of fire on the mountain for at least twenty years. From a recent inspection of the surrounding forest floor the litter is thick and very dry and a fire risk as to my knowledge no bushfire hazard reduction carried out in recent times. An inspection and advice from the Rural Fire Service should be sought.

An intensive bush fire on the mountain would likely damage the Vodafone tower substantially.

The final 1Km access road to Mt Moonimba is in a poor state, deeply rutted requiring access by four wheel drive vehicles. Heavily laden bush fire-fighting tankers would have difficulty with the condition of this access road.

Rock Blasting.

A geotechnical report has not been made available to determine the effects of rock removal through blasting. Would the vibrations transmitted through the rock will travel far enough to create harmonic disturbances to the radio communications towers? The nearest and most vulnerable tower is that owned and operated by Northern Communications, a guyed lattice tower, followed by the free standing mono pole of 88.9 FM. The Vodafone tower is sited on the edge of the mountain and is also vulnerable.

Native Fauna.

Further research and advice is sought on the protection of vulnerable species when habitats are disturbed from the expansion of the borrow sites.

Insufficient Time for Community and Stakeholder(s) Consultations.

Roger Wood OAM informed me of the proposals for the Environmental Impact Assessment Modification Report for the Moonimba Borrow Sites. The concern is that there was insufficient time given to communicating to the public and affected parties for them to attend either of the two meetings, consider information provided and make submissions to the Department of Planning and the Environment.