

I support the project in general but object to the proposal to increase heavy vehicle traffic along the Westlakes road system as outlined in the following points.

1. The increased amount of heavy vehicle traffic proposed to be traveling on public roads is likely to present a higher degree of risk to the local residents and passing traffic .
 - 1.1. There is no risk assessment apparent in the AECOM report to indicate any changes to the risk of accidents arising from the increase in heavy vehicles using the public roads.
 - 1.2. The report does not include evaluations of traffic hazards at the numerous road intersections along the routes that will be affected by the increase in heavy vehicle traffic. It was noted in the *Myuna Colliery Modification report for modification to project approval MP 10_0080t* dismisses the fact that sight distances at Wilton Rd/ Awaba Colliery, Donnelly Road and Buttabah Hills Road are less than recommended. This would be an applicable risk to the Eraring proposal. I would argue that the report's decision not to model traffic along the northern route should be reconsidered .
 - 1.3. Consideration must be given to the total increase in heavy vehicle movements along the northern route considering the potential increase if the *Myuna Colliery Modification report for modification to project approval MP 10_0080t* is approved.
 - 1.4. The assessment - *Table B1 Overview of Key Elements of Approved Project and Proposed Modifications* concludes that **negligible traffic and transport impacts would be caused by an increase of 223 truck movements a day**. This hasn't been substantiated by detailing existing heavy vehicle movements along the transport route and by what percentage increase the extra movements would add to it.
 - 1.5. The report notes that the expected increase in heavy vehicle movements would increase by 223 per day (approx. 9 per hour) , but does not define the time of day that these movements will occur. I.e. if the operation time of the export is between 6am and 6pm this would be effectively 18 movements per hour increase. There appears to be no controls over when the vehicles will be operating. If exports on weekend are not performed, these per hour movements will increase.
2. There will be increased damage to the road surfaces due to the increase in heavily laden vehicles traveling on the roadways.

The report does not determine or estimate the existing tonnage of road transport being carried and compare it with the extra 1.3 Mtpa proposed. This will lead to increased damage to the road surfaces and increase cost of road maintenance . The report has not assessed practical constraints of heavily laden vehicles traveling up the gradient from Wangi point Road to Donnelly Road when the ambient is high and road surface temperature causes road material to become soft . This can cause major damage to road surfaces.
3. The report prepared for the project assessment was lacking in detail on other options that could be used to transport the fly ash from site.

Were options considered to reduce the number of heavy vehicles on the public roads rather than increase them?

Were options of using existing infrastructure considered I.E. coal haul road and / or rail loop adjacent to the power station?

4. There appears to been a lack of public consultation regarding this proposal. The proposal has only recently been reported in the local newspaper. The report appearing on the day public comment closes.