

# SIRInc.

All correspondence to:  
The Secretary  
SIRA<sup>INC.</sup>  
PO Box 919  
KENMORE  
Qld 4069

25 April, 2002

The Chairperson  
Kholo Creek Hardrock Resource-Advisory Panel,  
Department of State Development  
PO Box 168  
Albert Street  
BRISBANE  
Qld 4002

**Attention: Mr. Nev Hore**  
**Infrastructure Projects and Land Management Branch**

**Reference: Draft Kholo Creek Hardrock Resource Consultancy for Road Transport Planning**

Dear Mr Hore,

SIRS has previously advised the Panel that it is committed to the issue of an accurate study report that

- states issues and concerns truthfully,
- is able to withstand detailed examination and scrutiny, and
- can serve as a reliable reference for future studies.

We have also previously advised the Panel of our many concerns over the content of the PPK report, and which have not yet been adequately resolved. We note that concerns raised by other Panel members have fared no better.

In an endeavour to illustrate the report's failings, SIRA has undertaken a review of just two of the technical aspects of the PPK report that are on record as giving cause for concern, namely

- traffic noise,
- vegetation.

We have been assisted in this review by

- David Moore and Associates – Review of Noise Report,
- Department Of Natural Resources – Vegetation Mapping of the study area,
- a SIRA member (a qualified cartographer) - Review of Vegetation Mapping.

Accordingly, attached please find

- the Summary of the David Moore report,
- comments on the PPK Vegetation Survey.

Copies of the full David Moore report and the Vegetation Map at A1 size will be tabled at the KCAP meeting to be held on 2 May 2002.

The review of just these two technical aspects has demonstrated that

Noise:

- an incorrect base for noise limits was adopted,
- inappropriate assumptions of truck noise levels were made,
- inadequate recognition was given to the deterioration of the acoustic environment,
- the WHO reference adopted by the study is out of date,
- incorrect ambient noise levels were adopted.

Vegetation:

- field vegetation survey sites are not representative of the study area,
- inappropriate vegetation reference data were used,
- the study failed to identify
  - “endangered” ecosystems which are severed by the study haul routes,
  - “endangered dominant” ecosystems that will be adversely impacted by the haul routes,
  - a very large area of “of concern dominant” ecosystem on the southern bank of the Brisbane River,
- the reported basis of ecosystem disturbance is fallacious.

These are serious deficiencies, and support our argument that the report is substandard in these and other matters. We reiterate our previous advice that we are unable to support the PPK report in its current form because

- The study has not complied with the Terms of Reference,
- The comparative ratings methodology used by PPK is inappropriate,
- Data collected as required by the Terms of Reference have not been used in the comparative evaluations,
- Public consultation failed to offer key data to interviewees, and failed to contact key stakeholders,
- The consequence of community severance has not been understood by PPK,
- Some engineering assumptions cannot be substantiated,
- Deficiencies in the acquisition and evaluation of data, as evidenced herein, engender lack of confidence in the report findings.

SIRA seeks the support of other panel members in ensuring that the report delivered to the public for comment

- complies with the Terms of Reference,
- states issues and concerns truthfully,
- is able to withstand detailed examination and scrutiny, and
- can serve as a reliable reference for future studies.

Yours faithfully,

G. J. Riding  
President SIRAinc.

Encl: David Moore Summary Report  
Comment on Vegetation Survey