

# Submission form for proposed changes to the Towamba River Unregulated and Alluvial Water Sharing Plan

## How to fill out this form

The department is seeking your comments on the draft Water Sharing Plan for the Towamba River Unregulated and Alluvial Water Sources 2022. **Note: Submissions close 19/06/2022**

Key issues and changes have been summarised in this submission form, although comment on all aspects of the water sharing plan is welcome. For water source specific details including rules, please see the water source report cards. More detailed comments are welcomed as attachments. Send completed submissions to:

Post: **ATT: Bridie Halse – Towamba WSP**

**DPE Water**

PO Box 2213, Dangar 2309

Email: [towamba.wsp@dpie.nsw.gov.au](mailto:towamba.wsp@dpie.nsw.gov.au)

## Information on privacy and confidentiality

Submissions received will be considered by NSW Department of Planning, and Environment and the Department of Primary Industries. The department values your input and accepts that information you provide may be private and personal.

If you would prefer your submission or your personal details to be treated as confidential, please indicate this by ticking the relevant box below. If you do not make a request for confidentiality, the department may make your submission, including any personal details contained in the submission, available to the public.

Please note that, regardless of a request for confidentiality, the department may be required by law to release copies of submissions to third parties in accordance with the *Government Information (Public Access) Act 2009*.

I would like my submission to be treated as confidential	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
I would like my personal details to be treated as confidential	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
<b>Name</b>	Ken McLeod	
<b>Postal Address</b>	[REDACTED] Bega NSW 2550	
<b>Telephone</b>	[REDACTED]	
<b>Email Address</b>	[REDACTED]	

<p><b>Stakeholder Group</b> (please indicate which of the following best represents your interest by <b>ticking one box</b>)</p>	<input type="checkbox"/> Water user – Licence holder <input type="checkbox"/> Water user – Basic Rights <input type="checkbox"/> Fishing interests <input checked="" type="checkbox"/> Local govt./ Utilities	<input type="checkbox"/> First Nation <input type="checkbox"/> Local landholder <input type="checkbox"/> Other government <input type="checkbox"/> Environment interests	<input type="checkbox"/> Community member <input type="checkbox"/> Other (specify)
<p><b>Did you attend the Towamba public webinar, a face to face meeting or have a meeting with the department about the water sharing plan?</b></p>	<p>Yes</p>		
<p><b>If your comments refer to a specific water source, which one?</b></p>	<p>Lower Towamba River</p>		

<p style="text-align: center;"><b>Long-term average annual extraction limit</b></p>	
<p>The replacement plan creates two long term average annual extraction limits (LTAAELs).</p> <ul style="list-style-type: none"> <li>• The Standard LTAAEL which sets a limit on extraction from all flows except for higher flows.</li> <li>• The Higher flow LTAAEL that manages extractions that can only take from higher flows.</li> </ul> <p>The reason for the two extraction limits is to limit extractions from all other flows and encourage extraction from higher flows.</p>	
<p>Do you support the new LTAAEL (Long Term Average Annual Extraction Limits) definition?  Why/why not?</p>	<p>We understand that specifying an amount of water available for take by licensed users and under basic rights is fundamental. It enables trading and defines the amount of water remaining for the environment and downstream take. It also enables a management system to vary AWDs depending on water availability. The Standard LTAAEL adopted for this plan is basically the existing licensed entitlement and the volume assessed for basic landholder rights. This is understood to be an interim measure. A future method, involving ecosystem requirements, recharge, hydrological boundaries, alluvial groundwater storage etc. is supported. It is unclear how related clauses for calculating annual standard extraction after the end of a water year will be given effect. It is unlikely there is broad scale accurate metering in place and compliance monitoring procedures to determine annual standard extraction (as well as access rules compliance) are understood to be a work in progress. The necessity for a Higher flow LTAAEL is unclear. The methodology to determine is also unclear. It doesn't seem warranted for this WSP. It may hinder conversion to high flow licences and investment in off-stream storages.</p>

<p style="text-align: center;"><b>Towamba River Coastal Floodplain Alluvial Groundwater Water Source</b></p>
<p>The draft plan proposes to establish a new groundwater water source in the alluvium downstream of the mangrove limit.</p>

The extraction limit for the proposed water source is higher than current usage levels and is set at 202 ML/yr.

Any additional water for licensed take may be made available through a controlled allocation process in the future.

Do you support inclusion of the new Towamba River Coastal Floodplain Alluvial Groundwater Water Source? Why / why not?

Yes

**Draft Access Rules for surface water sources**

The cease to pump rules protect ecological values and basic landholder rights in unregulated rivers from risks of insufficient low flows.

It is the level in the river at which water users need to cease pumping.

Changes are being proposed for Pambula Lake and Tributaries, Upper Towamba River, Lower Towamba River, Myrtle Creek, Mataganah Creek, Jingo Creek and Wog Wog River water sources.

Do you support the proposed cease to pump rules?  
Please explain why/why not.

Cease to pump (CTP) rules also apply to groundwater (this section heading is for surface water). Our submission feedback on CTP for groundwater is included in Additional feedback.  
Re. CTP rules for surface water:  
Part 6 Div.4 Clause 33(1) and Div.5 Clause 36(c) wording is unclear. It could be read that CTP rules based on flow classes only apply to a rising river. A comma after Very Low Flow Class would fix this.  
Part 6 Div. 4 Clause 32 (b) is very unclear. It reads: Surface water must not be taken for take from a water source under a former entitlement when flows are at or less than the flows specified in a cease to take condition. This condition will appear in WALs. The lack of clarity will increase the risk of licence confusion. The subclauses are also confusing.

Will the proposed cease to pump rules impact your business?  
If so, could you please explain how?

No

Do you think that the proposed cease to pump rules appropriately protect the environment?  
Please explain why/why not.

The increase to 6.5 ML/d from the former 5 ML/d for CTP will benefit the environment. The combination of requiring a visible surface flow and a CTP for Very Low Flow Class will improve maintaining flow connectivity.

Conversion to high flow access licences	
<p>It is proposed to allow conversion from a standard access licence to an access licence that can only extract from high flows in 2 water sources (Myrtle Creek and Mataganah Creek). If a conversion is to occur the licence share component would increase by 2.5 times but it would only be allowed to extract from high flows. The current plan also permits these conversions in Upper and Lower Towamba River, Jingo Creek and Wog Wog River Water Sources but this will no longer be allowed due to new information from the updated risk assessment showing the presence of the flow dependent Australian grayling fish species in the Towamba water sources and a low likelihood of stress from extraction in the low flows in Jingo Creek and Wog Wog River water sources so it is not necessary to include rules to mitigate stress in the low flows.</p> <p><i>Further information is contained in Part 8 of the draft plan and in the background document as well as the report cards for the relevant water sources.</i></p>	
<p>Do you think this is appropriate? Why / why not?</p>	<p><small>No. Lessening reliance on low flows by facilitating the shifting of extraction to higher flows should be a principle that applies in the Lower and Upper Towamba River water sources as well. The 2.5 times share component conversion process provides an incentive to offset the fundamental impediments of lower water demand for irrigation in high flow times and the construction cost for off-stream storages, to store the water. It doesn't seem necessary to restrict it by not permitting it. The take-up is likely to be low. The total unregulated river access share component in these water sources is only 856 ML/y. A B class flow of 34ML/d is exceeded 50% of the time. If a proportion of the share component was increased by 2.5 times for B and C class flows only, there would be less extraction and more flow in the river for the 50% of the time when conditions are drier. The flow dependent Australian grayling justification suggests a small % reduction to higher flows, as some pumps fill off-stream dams, is more of a threatening process than sustained pumping from in-river pools and in-river dam pools whilst there is a visible flow at the location. This seems odd, but if true, it should be supported in the background document and other documents.</small></p>

Draft trading rules	
<p>The current plan prohibits trade between water sources.</p> <p>Trade opportunities in the draft plan will be increased to allow trade from specific water sources into Wog Wog River, Upper Towamba, Myrtle creek, Mataganah Creek and Lower Towamba water sources.</p>	
<p>Do you support increasing trade into these water sources?</p>	<p><b>Yes.</b></p>
<p>Do increased trade opportunities encourage you to buy/sell water? Please explain why/why not.</p>	<p>Our share component of 1400 ML/y from this water source is sufficient for meeting future dry-year demand. The increased trade opportunities are unlikely to encourage us to purchase water allocations through the water market. We understand that selling allocations would only be allowed in a downstream direction and would carry greater scrutiny by regulators.</p>
<p>Do you have any comments on this aspect of the draft plan?</p>	

<b>Managing the risks of increased harvestable rights</b>	
<p>In 2022 the volume of water that can be captured in harvestable rights dams in coastal draining catchments will increase from 10% to 30% of rainfall runoff.</p> <p>This could impact on the volume of flow that reaches rivers. The plan includes a requirement that the uptake of harvestable rights will be assessed at year 3 and then access and trade rules may be reviewed if the uptake is greater than 10% of rainfall runoff.</p> <p><i>The amendment provision can be found in Part 10 of the draft Plan</i></p>	
<p>Do you think this is appropriate? Why / why not?</p>	<p><b>Yes</b></p>

<b>Water supply works approvals</b>	
<p>Works such as pumps, pipes, bores and weirs used for extracting water under licence require a water supply works approval. Rules controlling the granting of water supply works approvals or the nomination of water supply works are included in the Plan to minimise impacts on existing extraction and sensitive areas, including:</p> <ul style="list-style-type: none"> <li>• distances from where a new or replacement bore can be located, such as the distance from a contaminated source, a groundwater dependent ecosystem, or a culturally significant site for example</li> <li>• prohibiting works that cause more than minimal impact to coastal wetlands.</li> </ul> <p><i>These distance rules are contained in Part 7 of the plan.</i></p>	
<p>Do you think the distance rules for new or replacement bores are appropriate? If not, why?</p>	<p><b>Yes</b></p>
<p>Do you think rules to minimise impact on coastal wetlands are appropriate? If not, why?</p>	<p><b>Yes</b></p>

**Applications for Aboriginal Community Development licences**

We propose to permit applications for Aboriginal Community Development access licences in Myrtle Creek, Mataganah Creek, Jingo Creek, Wog Wog River and Towamba River Coastal Floodplain Alluvial Groundwater water sources.

Do you support allowing Aboriginal Community Development Licences in select areas?

**Yes**

Please explain why/why not.

**Metering provisions**

Do you support the proposed metering provisions and continuation of current metering requirements?

The non-urban water metering framework will apply to coastal areas of NSW in December 2023. Currently all works in the Towamba Water Sharing Plan are required to have a meter. Under the replacement plan these works will be required to continue metering. By December 2023, all meters must comply with the non-urban water metering framework.

New works also be required to adhere to the Non-urban metering framework.

Do you have any comments on this aspect of the draft plan?

**Yes, we support metering and data logging for all unregulated WALs.**

**Additional feedback**

The previous sections relate to the key proposed changes from the current water sharing plan. However, comments on all aspects of the plan are welcome and encouraged. Please use the space below, or attachments if required or preferred.

Comments on any aspect of the draft plan

We acknowledge and accept that the new Very Low Flow Class of <6.5 ML/d is a higher threshold for reduced groundwater extraction from Kiah borefield than the previous <5 ML/d. We believe this can be accommodated for town water supply. The impact will be monitored during the term of the plan and the secure yield for the Tantawango-Kiah water supply system will be re-modeled to estimate the impact of the change.

The wording of Part 6 Division 5 Clause 37 is unclear. Clause 37 will appear on our WAL. Clearer wording would lessen the risk of licence confusion. Suggested rewording below is consistent with how and when our WAL will more likely be read, that is, on a dropping flow:

Groundwater may continue to be taken from the Lower Towamba River Water Source under a local water utility access licence held by Bega Valley Shire Council:

- (a) when flows are in the A Class and there is no visible flow in the river downstream of the Kiah borefield, provided that the total volume of water taken is not more than 1ML/day
- (b) when flows are in the Very Low Flow Class, provided that the total volume of water taken is not more than
  - (i) 1ML/day if Ben Boyd Dam is at 50% capacity or more, or
  - (ii) 2.5ML/day if Ben Boyd Dam is at less than 50% capacity

As well as the suggested rewording we propose two additional conditions are added to Clause 37:

- (iii) as required to maintain the level in Ben Boyd Dam if Ben Boyd Dam is at less than 40% capacity
- (iv) as required to maintain the supply of water to the water reticulation system if Ben Boyd Dam is unavailable for any reason.

The proposed clauses (iii) and (iv) reflect the need to safeguard town water supplies in prolonged and acute event situations. The adoption of these additional clauses will enable future supply decisions to be made in compliance with the WSP, our WAL and in an appropriate timeframe. They are consistent with the Natural Resources Commission 2021 recommendations for securing town water supply, namely, that the plan remake should include:

- consideration of an emergency management provision that, when triggered, allows the local water utility to temporarily draw on individual water sources in emergency situations
- investigating revision of Plan provisions that provide Bega Valley Shire Council with the flexibility to optimise its water supply systems to meet peak daily demand and critical human water needs in emergency situations

At some stage, further refinement is recommended for the WSP around alluvial aquifers and the water stored within them. The volume of water stored in alluvial aquifers can be quite large. For example, an estimate of 3000ML exists for the Lower Towamba River alluvial aquifer. Access rules for the stored water resource are not given appropriate context in the plan. The groundwater storage component is contextualised as surface water in Part 6 Division 5 Clause 36. Access rules for groundwater extraction are focussed on the impact on surface water flows and pools. This is important, however it means the stored water volume is essentially unavailable for extraction when surface flows are low, except for special circumstances, like Kiah borefield, as acknowledged in Part 6 Division 5 clause 37 Specific Access Rules. Part 8 Clauses 53 and 55 show groundwater within 40m from the top of the high bank of a river is treated differently to groundwater beyond 40m. Storage component and surface flow recharge interaction context would improve understanding for this. The draft plan has created a new water source for coastal floodplain alluvial resources that are less connected to surface water. A further addition for consideration is alluvial resources that are strongly connected to surface water.

Ben Boyd Dam (BBD) is the main alternative source of water during A class and Very Low Flow Class flows, when 1 ML/d from the Kiah borefield will be insufficient to meet demand. Occasionally water quality from our alternative sources can be poor, due to algae, dam turnover, catchment rainfall, bushfires etc. Water treatment plants are being planned, designed and built throughout the shire to better manage this risk. However a clause for emergency provisions, that enable a return to Kiah borefield water extraction in quick time, if alternative water sources are experiencing water quality issues, is something we would appreciate being considered for the WSP and our WAL.

The new plan has combined the old Low Flow Class with the Very Low Flow Class and called it Very Low Flow Class. We think naming the only flow class lower than A class as Low Flow Class, instead of Very Low Flow Class, would make more sense.

<p>How did you hear about the Public Exhibition? (please tick one box)</p>	<input type="checkbox"/> Communication from peak body <input type="checkbox"/> Department of Planning, and Environment Website	<input type="checkbox"/> Radio <input type="checkbox"/> Social media <input type="checkbox"/> Newspaper	<input type="checkbox"/> Other (specify) <input checked="" type="checkbox"/> Direct email
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**From:** [digital.services=squiz.dpie.nsw.gov.au@squiz.regional.nsw.gov.au](mailto:digital.services=squiz.dpie.nsw.gov.au@squiz.regional.nsw.gov.au) on behalf of [digital.services@squiz.dpie.nsw.gov.au](mailto:digital.services@squiz.dpie.nsw.gov.au)  
**To:** [Water Towamba WSP Mailbox](#)  
**Subject:** Submission for the draft replacement Towamba River Unregulated and Alluvial Water Sharing Plan  
**Date:** Monday, 16 May 2022 7:48:47 PM

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### Permission

I would like my submission to be treated as confidential?: No

I would like my personal details to be treated as confidential?: No

### Your details

Name: Derek Lewis

Email address: [REDACTED]

Who are you representing?: Myself (individual)

If you are representing an organisation, what is the name of the organisation?:

Which stakeholder group best describes you?: Water user - licence holder

If you selected other, please specify:

### Your feedback

1. Did you attend the Towamba public webinar, a face to face meeting or have a meeting with the department about the water sharing plan?: No

2. Do your comments refer to a specific water source?: No

### Your feedback

3. Do you support the new LTAAEL (Long Term Average Annual No

Extraction Limits)  
definition?:

Could you please  
explain why?:

The amounts have been set at levels that will make irrigation  
pointless....only with stored backup can irrigation finish a  
crop.....there is no data available to users as to historical flow data

**Your feedback**

4. Do you support  
inclusion of the  
new Towamba  
River Coastal  
Floodplain Alluvial  
Groundwater Water  
Source?:

No

Could you please  
explain why?:

not enough information but not my area of interest so had to answer

**Your feedback**

5. Do you support  
the proposed cease  
to pump rules?:

No

Could you please  
explain?:

the principle is sound but levels are not...as before how do we even  
know how often dose 35 meg occur following a dry....how were  
these figures come up with...

**Your feedback**

6. Will the  
proposed cease to  
pump rules impact  
your business?:

Yes

Could you please  
explain how?:

make augmentry irrigation of lucerne occasional

7. Do you think  
that the proposed  
cease to pump rules  
appropriately  
protect the  
environment?:

No

Could you please  
explain why?:

they do not adress the main low flow extraction vastly over used  
riparian extraction at flow levels below 3 meg especially at 0 meg  
fire protection gardens etc

**Your feedback**

8. Do you support  
increasing trade?:

Yes

Could you please  
explain why?:

whilst clunky it is a mechanism but liscenses are not worth much  
with the new rules

**Your feedback**

9. Do increased  
trade opportunities  
encourage you to  
buy/sell water?:

Not relevant to me

Could you please  
explain why?:

not relevant

**Your feedback**

10. Do you think the rules for conversion to high flow access licenses are appropriate?:

Yes

Could you please explain why?: if people want it ...good .....but its mainly for dam filling

**Your feedback**

11. Do you think the review of access and trade rules following an assessment of the uptake of harvestable rights at year 3 is appropriate?:

Yes

Could you please explain why?: check its not harmful

**Your feedback**

12. Do you think the distance rules for new or replacement bores are appropriate?:

Yes

Could you please explain why?: far to much extraction that comes straight out of rivers

**Your feedback**

13. Do you think the rules to minimise impact on coastal wetlands are appropriate?:

Not relevant to me

Could you please explain why?: inland farm

**Your feedback**

14. Do you support allowing Aboriginal Community Development Licences in select areas?:

Yes

Could you please explain why?: they got it stole from them

**Your feedback**

15. Do you support the proposed

metering provisions  
and continuation of  
current metering  
requirements?:

Yes

Could you please  
explain why?:

no mobile coverage means not yet but measuring is good

16. Please provide  
feedback on any  
other aspects of the  
draft plan:

the levels set make a situation where triggers are often going to be hit and no return till heavy rain. when we designed the original plan 3 meg cutoff was an accurate measure that flow was disappearing ( 5 meg was often triggered) look at how little irrigation got done in the 2019 and on season...The amount irrigated was only around 1.5 meg daily but the 300 riparian users were using vastly more than this and it increased as the weather worsened....it is hard to see the flow data to ...

How did you hear  
about the Public  
Exhibition?:

Direct email

If you selected  
Other, please  
specify:

#### **Additional attachments**

If you want to  
provide additional  
feedback you can  
attach your  
documents here:

No file uploaded

**From:** [Chris Bath](#)  
**To:** [Bridie Halse](#)  
**Subject:** Fw: towamba water sharing plan  
**Date:** Friday, 17 June 2022 9:03:57 AM  
**Attachments:** [Outlook-5s15qiso.png](#)  
[Outlook-x0fh52v3.png](#)

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FYI.

**Chris Bath**  
Water Relationships

Water Sector | Department of Planning and Environment

[www.dpie.nsw.gov.au](http://www.dpie.nsw.gov.au)



*The Department of Planning and Environment acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.*

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**From:** Derek Lewis <dereklewis620@gmail.com>  
**Sent:** Thursday, 16 June 2022 8:18 PM  
**To:** Chris Bath <chris.bath@dpie.nsw.gov.au>  
**Subject:** Re: towamba water sharing plan

Hi Chris thanks for your consideration.... My knowledge is only to do with the towamba and tributaries. the discussion with the planner was really to ground truth a couple of issues that have been brought to our attention. It is as previously stated difficult to make time during the day

The presentation on the towamba plan suggests that BLRights are taking less water over time. This cannot be true and especially during the stressed times. Since the drought and fires there has been a rush to establish reticulation systems and a change in the ethic of sharing the little bit to getting what you can. Solar pumps have become common place and are thought of as small volume but use 1 to 5 kl daily....more in hot periods...there are 300+ households that mostly start their fire fighter pumps about when the flow gets to 1 meg The volume used in these periods greatly exceeds the amount extracted for irrigation when above the thresholds. The only drop in use is the gravity feed systems that mostly burnt in bushfires and NPWS is not allowing them back. These did use significant flows but not in the same magnitude. The mataganah with huge pools was drawn down to levels 4 m below flow levels with consequent non flow following rain. regards derek

On Thu, Jun 16, 2022 at 9:11 AM Chris Bath [REDACTED] wrote:

Hi Derek,

Thanks for getting in touch, I have forwarded your submission on to the planners to take into consideration.

Unfortunately, at this late stage in the process it might be hard to find time to talk to a planner, particularly after work hours.

We did offer individual phone calls with the water planner over the past fortnight, as well as opportunities to ask questions and discuss the plan with the planner, coastal planning manager and director at the Towamba meeting, as well as the webinar.

If there is something specific you would like to ask please send me an email and I will see if I can get a response back to you before public exhibition ends on Sunday.

As always, please feel free to give me a call to discuss at any time.

Thanks,  
Chris

**Chris Bath**  
Water Relationships

Water Sector | Department of Planning and Environment

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**From:** Derek Lewis [REDACTED]  
**Sent:** Wednesday, 15 June 2022 9:25 PM  
**To:** Chris Bath [REDACTED]  
**Subject:** towamba water sharing plan

Hi Chris, It is hard to find the time to assemble all the former designers of the water sharing plan. We are surprised that the new rules will practically stop legal irrigation. In my own personal case we bought a piece of land recently that had been illegally irrigating for years and have bought a water access for 10k plus that is now worthless . could you please find and submit as well as my above comment the attached submission. it can be displayed ,shared etc. We do not feel we have been the writers of the new plan. should I be talking to a planner. it would be best at night after 6 if possible as the days are very full.  
regards Derek lewis.....former chair of towamba water management committee

**From:** [Bridie Halse](#)  
**To:** [Water Towamba WSP Mailbox](#)  
**Subject:** FW: Replacing the draft Towamba water sharing plan  
**Date:** Monday, 20 June 2022 10:16:08 AM

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**From:** Ian Hamdorf [REDACTED]  
**Sent:** Sunday, 19 June 2022 9:55 AM  
**To:** Chris Bath <[REDACTED]>  
**Subject:** Replacing the draft Towamba water sharing plan

## **Towamba and tributaries water sharing submission**

In the late 1990's the Towamba River and Tributaries Water Management Committee (under the auspices of the Towamba Valley Landcare Group) took proactive steps to introduce a "Water Management Plan (WMP) after some short drought periods highlighted issues for water users in the catchment. There were four main user groups affected:

- "riparian rights"
- irrigation
- Bega Valley Shire Council (town supply and road works)
- environmental

These voluntary limits (cease to pump) were reasonably well adopted during the ensuing persistent drought period from 2000-10 apart from township users (eg Eden, Merimbula, etc) that did not have similar restrictions imposed on garden watering and other outdoor uses, which wrangled many upstream users who were heavily restricted. These voluntary limits were much lower than adopted for the current plan and very much lower than what is being proposed.

To further restrict the agricultural irrigation users through this new schedule, when no increased use is apparent, and severely restrict their usage in times of lower flows, through the use of higher cease to pump and very much higher (34 meg) restart to pump levels of flow. This equates to a 41% increase in the no pump time and would make practically all agricultural irrigation in the entire catchment worthless and not worth the investment in crops or infrastructure. To use the "endangered" grayling to justify the cutbacks on agriculture usage when willows soak up far greater volumes of water from the system seems totally unfair. The current cease/restart to pump levels should be retained, as they appear to be allowing the fish (both native and introduced species) to survive in this highly modified river system.

While the rainfall in this area is highly variable the run-off and river flows are largely dependent on rainfall in the catchment as there are no flow controlling structures in the rivers and creeks. It seems tenuous to use Bombala recordings (Avg 570mm pa) as indicative of this area, as Bombala is 40-50 km away and on top of the scarp and in a totally separate catchment. I have 46 years of rainfall records for Log Farm Road about 1-

2km SE of Towamba that show an average of 868.2mm pa, which indicates more thorough data searching might show a healthier system. I am aware that historical records for Wyndham go back to the early 1900s and are available in Water Authority publications from the past. Similarly, using Green Cape data (Avg 627.2 mm pa) for Lower Towamba is fraught given my data shows around 30% higher rainfall near Towamba village and much closer to the river gauge. It seems farmers/irrigators are just as “endangered” as the grayling under the proposed plan. Unfortunately, I have not been able to access the “Water NSW” data for the Towamba gauge (220004) to check against longer term rainfall/flow data. However, given my experience with NSW authorities in recent times (lets say 25 years) public consultation takes little notice of water users/taxpayers so the draft proposal is cut and dried and I am wasting my time with this submission anyway.

Ian Hamdorf



Towamba, 2550, NSW

# Submission form for proposed changes to the Towamba River Unregulated and Alluvial Water Sharing Plan

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The department is seeking your comments on the draft Water Sharing Plan for the Towamba River Unregulated and Alluvial Water Sources 2022. **Note: Submissions close 19/06/2022**

Key issues and changes have been summarised in this submission form, although comment on all aspects of the water sharing plan is welcome. For water source specific details including rules, please see the water source report cards. More detailed comments are welcomed as attachments. Send completed submissions to:

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**DPE Water**

PO Box 2213, Dangar 2309

Email: [towamba.wsp@dpie.nsw.gov.au](mailto:towamba.wsp@dpie.nsw.gov.au)

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I would like my submission to be treated as confidential

Yes

No

I would like my personal details to be treated as confidential

Yes

No

<b>Name</b>	Michael S Harewood
<b>Postal Address</b>	[REDACTED] Kiah NSW 2551
<b>Telephone</b>	[REDACTED]
<b>Email Address</b>	[REDACTED]

<p><b>Stakeholder Group</b> (please indicate which of the following best represents your interest by <b>ticking one box</b>)</p>	<input type="checkbox"/> Water user – Licence holder <input type="checkbox"/> Water user – Basic Rights <input type="checkbox"/> Fishing interests <input type="checkbox"/> Local govt./ Utilities	<input type="checkbox"/> First Nation <input type="checkbox"/> Local landholder <input type="checkbox"/> Other government <input checked="" type="checkbox"/> Environment interests	<input type="checkbox"/> Community member <input type="checkbox"/> Other (specify)
<p><b>Did you attend the Towamba public webinar, a face to face meeting or have a meeting with the department about the water sharing plan?</b></p>	<p>No</p>		
<p><b>If your comments refer to a specific water source, which one?</b></p>			

<p style="text-align: center;"><b>Long-term average annual extraction limit</b></p>	
<p>The replacement plan creates two long term average annual extraction limits (LTAAELs).</p> <ul style="list-style-type: none"> <li>• The Standard LTAAEL which sets a limit on extraction from all flows except for higher flows.</li> <li>• The Higher flow LTAAEL that manages extractions that can only take from higher flows.</li> </ul> <p>The reason for the two extraction limits is to limit extractions from all other flows and encourage extraction from higher flows.</p>	
<p>Do you support the new LTAAEL (Long Term Average Annual Extraction Limits) definition? Why/why not?</p>	<p>Yes, but I am concerned with how interception is dealt with (or not) in the LTAAEL's. Interception by harvestable rights dams on low order gullies may actually help protect or improve baseflows but interception by pine plantations and dense regrowth forest following high intensity logging and wildfire will almost certainly diminish baseflows.</p>

<p style="text-align: center;"><b>Towamba River Coastal Floodplain Alluvial Groundwater Water Source</b></p>
<p>The draft plan proposes to establish a new groundwater water source in the alluvium downstream of the mangrove limit.</p>

The extraction limit for the proposed water source is higher than current usage levels and is set at 202 ML/yr.

Any additional water for licensed take may be made available through a controlled allocation process in the future.

Do you support inclusion of the new Towamba River Coastal Floodplain Alluvial Groundwater Water Source? Why / why not?

I support the inclusion in the plan but I think the usage level proposed should be justified. Deep-rooted trees and even the access to groundwater by wombats in drought times could be adversely impacted.

**Draft Access Rules for surface water sources**

The cease to pump rules protect ecological values and basic landholder rights in unregulated rivers from risks of insufficient low flows.

It is the level in the river at which water users need to cease pumping.

Changes are being proposed for Pambula Lake and Tributaries, Upper Towamba River, Lower Towamba River, Myrtle Creek, Mataganah Creek, Jingo Creek and Wog Wog River water sources.

Do you support the proposed cease to pump rules?  
Please explain why/why not.

Yes

Will the proposed cease to pump rules impact your business?  
If so, could you please explain how?

No

Do you think that the proposed cease to pump rules appropriately protect the environment?  
Please explain why/why not.

Reasonable compromises. However, what is the ctp for pine plantations intercepting groundwater which supports baseflows?

Conversion to high flow access licences	
<p>It is proposed to allow conversion from a standard access licence to an access licence that can only extract from high flows in 2 water sources (Myrtle Creek and Mataganah Creek). If a conversion is to occur the licence share component would increase by 2.5 times but it would only be allowed to extract from high flows. The current plan also permits these conversions in Upper and Lower Towamba River, Jingo Creek and Wog Wog River Water Sources but this will no longer be allowed due to new information from the updated risk assessment showing the presence of the flow dependent Australian grayling fish species in the Towamba water sources and a low likelihood of stress from extraction in the low flows in Jingo Creek and Wog Wog River water sources so it is not necessary to include rules to mitigate stress in the low flows.</p> <p><i>Further information is contained in Part 8 of the draft plan and in the background document as well as the report cards for the relevant water sources.</i></p>	
<p>Do you think this is appropriate? Why / why not?</p>	<p><b>Yes. Maybe a higher factor would encourage take-up.</b></p>

Draft trading rules	
<p>The current plan prohibits trade between water sources.</p> <p>Trade opportunities in the draft plan will be increased to allow trade from specific water sources into Wog Wog River, Upper Towamba, Myrtle creek, Mataganah Creek and Lower Towamba water sources.</p>	
<p>Do you support increasing trade into these water sources?</p>	<p><b>Yes</b></p>
<p>Do increased trade opportunities encourage you to buy/sell water? Please explain why/why not.</p>	<p><b>No, not involved in extraction.</b></p>
<p>Do you have any comments on this aspect of the draft plan?</p>	<p><b>Modest liberalization.</b></p>

Managing the risks of increased harvestable rights	
<p>In 2022 the volume of water that can be captured in harvestable rights dams in coastal draining catchments will increase from 10% to 30% of rainfall runoff.</p> <p>This could impact on the volume of flow that reaches rivers. The plan includes a requirement that the uptake of harvestable rights will be assessed at year 3 and then access and trade rules may be reviewed if the uptake is greater than 10% of rainfall runoff.</p> <p><i>The amendment provision can be found in Part 10 of the draft Plan</i></p>	
<p>Do you think this is appropriate? Why / why not?</p>	<p><b>Yes, could potentially help protect low flows in dry times.</b></p>

Water supply works approvals	
<p>Works such as pumps, pipes, bores and weirs used for extracting water under licence require a water supply works approval. Rules controlling the granting of water supply works approvals or the nomination of water supply works are included in the Plan to minimise impacts on existing extraction and sensitive areas, including:</p> <ul style="list-style-type: none"> <li>• distances from where a new or replacement bore can be located, such as the distance from a contaminated source, a groundwater dependent ecosystem, or a culturally significant site for example</li> <li>• prohibiting works that cause more than minimal impact to coastal wetlands.</li> </ul> <p><i>These distance rules are contained in Part 7 of the plan.</i></p>	
<p>Do you think the distance rules for new or replacement bores are appropriate? If not, why?</p>	<p><b>See comment in attached submission.</b></p>
<p>Do you think rules to minimise impact on coastal wetlands are appropriate? If not, why?</p>	<p><b>Yes</b></p>

**Applications for Aboriginal Community Development licences**

We propose to permit applications for Aboriginal Community Development access licences in Myrtle Creek, Mataganah Creek, Jingo Creek, Wog Wog River and Towamba River Coastal Floodplain Alluvial Groundwater water sources.

Do you support allowing Aboriginal Community Development Licences in select areas?

Please explain why/why not.

**Yes.**

**Metering provisions**

Do you support the proposed metering provisions and continuation of current metering requirements?

The non-urban water metering framework will apply to coastal areas of NSW in December 2023. Currently all works in the Towamba Water Sharing Plan are required to have a meter. Under the replacement plan these works will be required to continue metering. By December 2023, all meters must comply with the non-urban water metering framework.

New works also be required to adhere to the Non-urban metering framework.

Do you have any comments on this aspect of the draft plan?

**Essential for credible implementation of the plan.**

**Additional feedback**

The previous sections relate to the key proposed changes from the current water sharing plan. However, comments on all aspects of the plan are welcome and encouraged. Please use the space below, or attachments if required or preferred.

Comments on any aspect of the draft plan

**How did you hear about the Public Exhibition?**

(please tick one box)

Communication from peak body

Department of Planning, and Environment Website

Radio

Social media

Newspaper

Other (specify)

Direct email

## Comments on the Draft Towamba Water Sharing Plan 2020

Mick Harewood, June 2020.

In general, the changes proposed to the previous plan are reasonable and to be welcomed.

The protection of low flows for the breeding migration of Australian Grayling and other diadromous fishes is important. The slight relaxation of rules for water trading and an increase in harvestable rights should compensate for any adverse economic impact of the increased protection of low flows.

Implementation of mandatory metering is welcomed.

### Specific comments.

Harvestable Rights (pages 10/44 and 14/44). It is noted that the volume amount of harvestable rights interception (this is not extraction) has not been determined. If the construction of harvestable rights dams is limited to first and second order gullies, the impact on low flows is likely to be negligible and perhaps even positive.

Depending on antecedent wetness, small rain events will rarely produce a surface flow in first and second order gullies. Harvestable rights dams are most likely to fill during significant rainfall events of 100mm or more over a few days. Such events might occur once, twice or three times per year on the Far South Coast. Storing water captured during these events is potentially beneficial in protecting very low flows because

- There is less need to extract water from streams at times of low flow
- Irrigation in dry times with water stored in harvestable rights dams will increase the overall wetness of catchment soils

It is instructive to consider the total volume of water available at low flows versus the total annual runoff. If one calculates the area under a flow duration curve or a daily hydrograph, it is possible to get an estimate of the total volume of water available in dry times compared to flood times. The overall preponderance of water flows out to sea in the first few days of, and after, a significant rainfall event. Only a small proportion of average annual flow is available during A, B and C class flows, perhaps less than 10 or 20%.

The encouragement to store more water that is available during wet times might go some way to ameliorating the historical changes to flow regimes that have resulted from European invasion and settlement. I note that there have been no high flow licences issued (15 (4)). Perhaps access to this resource could be promoted.

It is also noted that increased interception of groundwater by pine plantations and young regrowth native forests has not even been considered. Why not? There is no "cease to pump" for trees and increased evapotranspiration by pine plantations and dense regrowth forests is certain to decrease baseflows in dry times.

Aquifer Licences 15(5), page 12/44.

It is hard to see how extraction of ground water during dry times would not have an adverse impact on the local environment. A significant lowering of the water table would deprive deep-rooted trees of access to water. I do not believe any growth in groundwater access licences should be permitted unless it can be clearly demonstrated that the freshwater resource is currently being lost to the ocean via a sub-surface route.

45(3) page 25/44. Construction of a water supply work within 250 meters of an on-site sewage disposal system. The risk of contamination here depends very much on the nature of the on-site system and its on-going maintenance and performance. There is probably sufficient flexibility on the wording of this provision to allow for reasonable outcomes. I note that the EPA requires a higher standard than the conventional septic tank and subsurface effluent disposal by absorption for on-site systems within 100 meters of a wetland.

### Conclusions.

The changes to the Towamba water sharing plan are moderate and generally to be welcomed. As the climate continues to change, increasing temperatures will cause increased evapotranspiration losses, especially in pine plantation and the regrowth forests that have developed following intensive logging and the 2019/2020 fires. These effects will put further pressure on low flows, so the implementation of effective metering cannot come soon enough.

Increased water storage throughout the catchment could go some way to protecting low flows, but the steep topography and porous sub-soils make dam construction expensive and risky in much of the area. However, we are facing a future with a high risk of catastrophic wildfires as the regrowth forest develops. More water storage throughout the landscape might help to ameliorate this risk.

SUBMISSION TO THE TOWAMBA RIVER WATER SHARING PLAN

FROM Monica McMahon

[REDACTED] Kiah NSW 2551

Telephone [REDACTED]

Email [REDACTED]

Property status 13ha with Riparian rights

Privacy issue `Ok to publish

Date 15 June 2022

Thank you for the opportunity to comment on the draft replacement **Towamba river unregulated and alluvial water sharing plan (on line)** and related documents which I obtained whilst attending a public information session in Towamba on 19 May.

I should say that these documents are not an easy read, requiring as they do some expertise and/or familiarity with the language in order to assess what is implied in terms of what is allowed and not allowed. However, I am pleased to see there is some tightening of what can be taken in dry times and there is a stated determination to protect this river which still contains some pre-settlement aspects unlike other rivers on the NSW coast in low or no rainfall periods.

I am the 4<sup>th</sup> generation of my family to live on this river and so have some personal and historical (oral history) knowledge of the river. My maternal and paternal great grandparents were pioneer settlers to Kiah from the 1840s to the 1860s, and my grandparents and parents were born here. I was born in 1941 and lived here until my early 20s and returned when I retired in 2000 on part of the old McMahon property. I run no animals here but periodically allow neighbour's cows to graze to keep the grass down.

Prior to my retirement I worked for many years for the Commonwealth Government in line departments as well as the Department of Prime Minister and Cabinet and the Department of the Senate (Committees) so I have some appreciation of how difficult it is to develop policies that meet the needs of a diverse range of interest from a demanding public whilst at the same time taking broader responsibility approaches deemed necessary to the overall interests of the country.

Since settling back here I have experienced 2 droughts (river stopped running), 3 big floods – 2011, 2016 and 2021 (taking fences on the flat) and a big bushfire. Compare that with my father's experience. He died in 1993 at the age of 88. I recollect him saying in the 1980s that he only saw the river stoop running twice in his life. I know there were floods that came over the flats that damaged crops but only big ones a few times – 1919, 1952 and 1971. Similarly with droughts; hard but few and far between. When you look at what I have experienced in just 22 years you must conclude that something significant is happening to the climate.

It will be so important for the Government to have in place significant procedures to protect against exploitation during low rainfall and significant periods of drought. Although the Plan implies this if inspection/policing resources are not put there with powers to prosecute anyone taking more than they are allowed and who ignore the cease to pump rules this won't happen..

During the millennium drought here I was impacted by the Bore Field/town water supply source as I am in the: draw down zone (see my submission to the last draft Plan) but this time, although the flow had stopped, there was still surface water That, I am glad to say, was due to the Bega Valley Shire Council planned alternate sources which assisted in the environmental protection of this river source as well as the more restrictive cease to pump rules for the bore field contained in the current plan.

Before the millennium drought broke I undertook an experiment to test the theory that the bore field draw down would not bite very far on either side of the pump and that it would take the shape of a very large V. Some nutters were arguing that it would bite as far as Towamba. So I dug holes at the pump site and then every few hundred meters back up to where there was still wet sand off myister's property (Clare McMahon) not far up stream from my place. (see my submission to the last draft plan).

When the drought broke (albeit not a major fall) the river came, less than a metre wide overnight from Towamba, arriving at the top half of my sister's property by midday. She alerted me and I went to meet it. When it hit where there had been moisture apparent in my experiment it stopped. It took 6 days to come down past my place and on towards the bore field and it stopped before it got there until a decent fall of rain happened again. This thus proved the scientific experts. Note that little trickle had a great many greylings (about 10cm long and big) running with the water. Where they came from I cannot say as there were very few if any pools of water upstream. Out of the wet sand?

I went to the public meeting the department scheduled in Towamba on the 20<sup>th</sup> of May 2022. This was meant to be a general information session but due to the attendance of what was clearly mostly "licence" holders the meeting was pretty much focussed on new rules about how much water could be taken and about metering. In my somewhat limited understanding of licencing entitlements I have long had the impression that licence holders, if they were activating these rights, (irrigators etc?) were obliged to have meters on their pumps. None of those present had metres. One bloke said he didn't have one and asked how many of those present did. He asked them to put up their hands. Nobody did. That really shocked me. I don't know where these licence holders (some 20 people) were from but they weren't known by a Towamba village friend who was there. Were/are they pumping in the upper regions without any restrictions to what they take?

I see from the new plan that there is plenty of talk about meters but I fear the consequences if there is no enforcement. That aspect and the implications of future growth in the population of the towns and along the river and demands from there as well is worrying. Some very hard-nosed approaches to current usage, future development, and policing of the rules will need to be taken otherwise I fear the river will become a dry drain.

From my work in the Commonwealth Public Service I know when budgets are tight it is difficult to justify expensive monitoring, reporting and prosecution for little apparent gain. For example pursuing social security fraudsters. These efforts tend to cost more than is economically rational. In the case of the environment cost should not be a factor. There should be close monitoring in good as well as bad times and tough action taken on infringers of the system.

I would like to see the Plan broaden its discussion about protecting the high ecological values of the river to also protecting the wildlife around the river and its creeks in the upper regions. The wildlife (native animals and birds) rely on the creeks and the river for water and during the millennium drought a lot perished as there were very few water holes to access. In years gone by the seepage from the upper regions and the various swamps on the way down, kept water on the surface even when it might not have been flowing. It is hard to know wildlife die of thirst while people water their lawns in the town and to see water running down the gutters and no water restrictions. The Bega Valley Shire is too slow to bring on restrictions. It appears it is reluctant to do that, particularly during the tourist seasons.

I have seen a shocking reduction in the wildlife here since my return to live on the river. The droughts had significant impacts and then the bushfire was the last straw. Recovery will take a long time.

Very best wishes in your endeavours.  
Monica McMahon.

**From:** [digital.services=squize.dpie.nsw.gov.au@squize.regional.nsw.gov.au](mailto:digital.services=squize.dpie.nsw.gov.au@squize.regional.nsw.gov.au) on behalf of [digital.services@squize.dpie.nsw.gov.au](mailto:digital.services@squize.dpie.nsw.gov.au)  
**To:** [Water Towamba WSP Mailbox](#)  
**Subject:** Submission for the draft replacement Towamba River Unregulated and Alluvial Water Sharing Plan  
**Date:** Saturday, 14 May 2022 4:55:09 PM

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### Permission

I would like my submission to be treated as confidential?: No

I would like my personal details to be treated as confidential?: No

### Your details

Name: Richard cavanough

Email address: [REDACTED]

Who are you representing?: Myself (individual)

If you are representing an organisation, what is the name of the organisation?:

Which stakeholder group best describes you?: Community member

If you selected other, please specify:

### Your feedback

1. Did you attend the Towamba public webinar, a face to face meeting or have a meeting with the department about the water sharing plan?: No

2. Do your comments refer to a specific water source?: Lower Towamba River Water Source

### Your feedback

3. Do you support the new LTAAEL (Long Term Average Annual Extraction Limits) definition?: No

Could you please explain why?: All you are doing is causing stress to people who have been through hell with the recent fires and do not need people who do not live in the area telling them that they now need to have a meter in order to pump household water to their house tanks.

### Your feedback

4. Do you support inclusion of the new Towamba River Coastal Floodplain Alluvial Groundwater Water Source?: No

Could you please explain why?: See previous comment

### Your feedback

5. Do you support the proposed cease to pump rules?: No

Could you please explain?: See first comment.

**Your feedback**

6. Will the proposed cease to pump rules impact your business?: Doesn't apply to me

Could you please explain how?: Does not apply to me.

7. Do you think that the proposed cease to pump rules appropriately protect the environment?: No

Could you please explain why?: This valley has been ok for the past 170 years without any problems with water .in fact most problems in the past have been the result of having too much water.,ie floods.

**Your feedback**

8. Do you support increasing trade?: No

Could you please explain why?: River floods about four times a year.

**Your feedback**

9. Do increased trade opportunities encourage you to buy/sell water?: Not relevant to me

Could you please explain why?: Not relevant to me.

**Your feedback**

10. Do you think the rules for conversion to high flow access licenses are appropriate?: Not relevant to me

Could you please explain why?: Not relevant.

**Your feedback**

11. Do you think the review of access and trade rules following an assessment of the uptake of harvestable rights at year 3 is appropriate?: Not relevant to me

Could you please explain why?: Not relevant to me.

**Your feedback**

12. Do you think the distance rules for new or replacement bores are appropriate?: Not relevant to me

Could you please explain why?: Not relevant.

**Your feedback**

13. Do you think the rules to minimise impact on coastal wetlands are appropriate?: Not relevant to me

Could you please explain why?: Not relevant.

**Your feedback**

14. Do you support allowing Aboriginal Community  
No

Development Licences in select areas?:

Could you please explain why?: I am sick of this.

**Your feedback**

15. Do you support the proposed metering provisions and continuation of current metering requirements?: No

Could you please explain why?: Refer to my first comment.just stop interfering in people's lives.

16. Please provide feedback on any other aspects of the draft plan: See above.

How did you hear about the Public Exhibition?: Other

If you selected Other, please specify: Concerned members of the district.

**Additional attachments**

If you want to provide additional feedback you can attach your documents here: No file uploaded

## A Submission in Response to the Draft Towamba Water Sharing Plan

My wife and I have for the past twenty six years been farming cut flowers on our property at Wyndham. It is not a large enterprise but has been enough to provide us with a modest living.

We have a licence (WAL no. [REDACTED]) to pump nine megalitres P.A. and have a small electric pump which delivers around 3000lt per hour. Unfortunately we haven't kept an accurate log book record until recently after being cautioned by NRAR. But having kept a record for the past two years has confirmed how little we use. Even in the driest years we would only pump a fraction of our allocation. If the pump ran continuously we could only pump 2.6 megalitres in a year.

The point is we don't use a lot of water and to have to install a meter which may cost thousands of dollars is disproportionate. After further inquiry we may consider applying for an exemption considering we have an effective metering system by way of electricity consumption.

When there have been dry times we have always abided by the rules agreed by our local water management committee and ceased irrigation when the Towamba flow fell below 3 megalitres a day. This system has worked well over the years. In a community where most know who's who it is not wise to flout the rules.

With the system working, change should not be imposed without more research. Stick with the current limits until more is known about licenced extraction volumes. The restart to pump at 35 megalitres is useless as after such a rain event there is no need to irrigate.

Community consultation is fine if it leads to the adoption of the sensible wishes of the community.

Stephen Wilson & Patricia Castillo.

# SUBMISSION TO THE DEPARTMENT OF PLANNING AND ENVIRONMENT 'S TOWAMBA RIVER WATER SHARING PLAN

FROM Clare McMahon

██████████, Kiah NSW 2551

Telephone ██████████

Property Beef production with riparian rights

Privacy Ok to publish

Date 16 June 2022

I write to provide some comments on the Draft replacement **Towamba River Unregulated and Alluvial Water Sharing Plan**.

My family have been farming on the river at Kiah since this area was settled in the mid-1800s. Up until Britain joined the Common Market in the 1970s we and other Kiah farmers were undertaking dairy (butter producers), pigs, corn and green beans for the Sydney market.

I worked for my father for many years and when he turned to beef farming I moved to Canberra and pursued a career in the Commonwealth Public Service in Austrade. I worked overseas on Australia's exports serving in Indonesia, Fiji covering the Pacific Islands, as Consul General and Australian Trade Commissioner in Mumbai India.

After my father died in 1993 I bought the farm and continued on with beef production from a distance and now hands on since I retired in 1999. Kiah has always been my home.

In my 82 years it is my view that the weather has and will continue to follow the same pattern. There will be wet years, floods, droughts, hot summers, cold winters.