Thank you for the opportunity to comment on the Towamba water sharing plan. Whilst I agree with the Towamba landcare submission I want to emphasize one point.

On the coastal strip there are infrequent very heavy falls that provide the only gully flows except during exceedingly wet times when everything is flowing. During these extreme gully flows much water can be stored without a noticeable effect on overall flow levels. We are not like the inland plains. We believe our situation is vastly different. The numbers in these events are compelling with many hundreds or thousands of megaliters flowing daily and total storages in the valley being significantly less than the daily flow. We only very seldom get a small flow event. The first 100 mm of a big rainfall event soaks straight in to our very free draining soils.

On many farms dams store water in non-flowing gullies (except in the very wet times when there is too much water in the watertable). On my farm a large dam uses most of the harvestable right (around 15 meg) and this dam consistently leaks water over 2 years till it is empty but provides an environmental service keeping the landscape and water table hydrated. This is the common scenario yet no extra storage can be constructed for use and our irrigation cannot be supplemented in the times of low flow because of maximum harvestable right.

If we are to be adaptive to a heating and drying climate extra storages in non-flowing gullies are a must. They have the ability to increase both production and baseline flows and environmental outcomes in the river and streams.

We need the ability to be proactive on water harvesting with all the possible benefits from firefighting to small scale horticultural irrigation and environmental improvement.

Derek lewis farmer and irrigator

2/7/20