

April 13, 2014

David Gloski
Engineer
3025 Willow Road West
Bethel Island, CA 94511

Mr. Oscar Biondi
Water Quality Certification Program
Division of Water Rights
State Water Resources Control Board
PO Box 2000
Sacramento, CA 95812-2000

Subject: Comments and Safety Concern Resulting From False River Barrier

Mr. Biondi,

I have had a home on Bethel Island for 15 years and do extensive boating on False River, Fisherman's Cut and Taylor Slough. I also have a Mechanical Engineering Degree from MIT. I attended a meeting a few weeks ago where staff from the State Department of Water Resources presented "information" on their plan to build a barrier across False River to the Bradford Island Reclamation District.

I see on the Corps of Engineers' website that *"The decision whether to issue a permit will be based on an evaluation of the probable impacts, including cumulative impacts, of the described activity on the public interest."*

Among other things, the Corps' website also states that *"All factors which may be relevant to the described activity will be considered, including the cumulative effects thereof; among those are conservation, economics, aesthetics, general environmental concerns, wetlands, historic properties, fish and wildlife values, flood hazards, floodplain values, land use, navigation, shoreline erosion and accretion, recreation, water supply and conservation, water quality, energy needs, safety, food and fiber production, mineral needs, consideration of property ownership and, in general, the needs and welfare of the people."*

I have SERIOUS concerns about the issues of Safety, Shoreline Erosion, Environmental, Property Ownership and as a result the Welfare of the People, resulting from a placement of a barrier across False River.

From information that I am able to get access to, it appears that there is a serious lack of understanding about the resulting flow rates that should be expected in Fisherman's Cut and through Dutch and Taylor Slough as a result of a barrier across False River. When questioned at the meeting that I attended, the DWR staff could not state any modeling results that showed what flow

rates could be expected in these alternative flow paths. A member of the Bradford Island Reclamation District Staff cited DWR's own Franks Tract Study of 2009 that indicated a 20% reduction in flow for False River increased the flow in Fisherman's cut five times (5x). This implies a complete barrier across False River will result in massively increased flows. These increased flows around the northwest corner of Bradford Island and through Dutch and Taylor Sloughs could result in serious levee damage and scouring.

Is the state and the Corp of Engineers prepared to make emergency levee repairs? The serpentine nature of Taylor Slough makes the increased flows a serious concern for scouring. Even if somehow the levees are able to handle the flows, what about the long term impacts of the scouring? I believe the nearby island districts should be able to get relief from the additional costs they are going to incur to keep their levees safe over the upcoming years as a result of scouring.

The DRW staff pointed out several times the huge benefit achieved by blocking false river and thereby better handling salinity levels. I could not agree more as False River moves lots of water. However, by addressing one problem I fear that these other very severe problems could also be created. I personally am very uncomfortable that there is a proper understanding of the resulting flow rate effects in Fisherman's Cut and Dutch and Taylor Slough. I don't believe this is complicated modeling and so I wonder why I have not heard any numbers.

No permit should be issued for this barrier until all the neighboring islands and their reclamation districts responsible for the safety of residents understand exactly the additional burden that is going to result on the current levee structures. This can only be done by showing the modeling results of a complete barrier across False River and what the expected flows will be in Fisherman's Cut and Dutch and Taylor sloughs. Without these results, no one can assure the safety of people living on these islands.

Secondarily, while the barrier will reduce salinity levels internal to the delta, it would be nice to see other water quality measures that could be expected such as e.coli concentration and nitrogen levels resulting from less flow in and out of the estuary.

Please do not move toward a permit unless everyone understands and agrees that resulting flows in these other channels are understood and found to be of a level that will assure safety.

Sincerely,



David M. Gloski

Engineer and Bethel Island home owner