JOHN BRISCOE (053223)
LAWRENCE S. BAZEL (114641)
MAX ROLLENS (308984)
BRISCOE IVESTER & BAZEL LLP
155 Sansome Street, Seventh Floor
San Francisco, CA 94104
(415) 402-2700
Fax (415) 398-5630
jbriscoe@briscoelaw.net
lbazel@briscoelaw.net
mrollens@briscoelaw.net

Attorneys for Petitioners John D. Sweeney and Point Buckler Club, LLC

STATE OF CALIFORNIA

STATE WATER RESOURCES CONTROL BOARD

In the matter of: CLEANUP AND ABATEMENT ORDER NO. R2-2016-0038; JOHN D. SWEENEY AND POINT BUCKLER CLUB, LLC, POINT BUCKLER ISLAND, SOLANO COUNTY	No. DECLARATION OF JOHN D. SWEENEY IN SUPPORT OF REQUEST FOR STAY

I, John D. Sweeney, declare as follows:

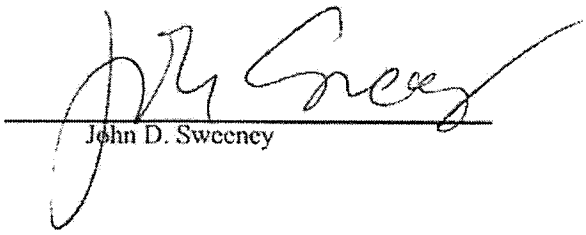
1. I am manager of Point Buckler Club, LLC (the "Club"). I have personal knowledge of the facts in this declaration, and if called as a witness could competently testify to them.

2. The cleanup and abatement order calls for the submission of plans that must be prepared by consultants at a cost exceeding $100,000. The Order also calls mitigation in an unspecified amount to be determined by the Regional Board. Based on my personal knowledge and Regional Board staff cost estimates for permitting the levee repair, the Club and I may have to incur costs that could exceed $1 million dollars during the time the State Board is considering the petition. The Club and I cannot afford these costs at this time.

3. The duck club restoration activities have been placed on hold.

I swear under penalty of perjury under the laws of the State of California that the statements in this declaration are true and correct.

DATED: September 8, ~~2015~~ 2016



John D. Sweeney