



November 23, 2016

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COMMENTS -- SAN JOAQUIN RIVER BASIN-WIDE FEASIBILITY STUDY

We have reviewed the "October 2016 Stakeholder Review Draft" and have the following comments and suggested changes to improve the final report:

1. P. 1-9, Section 1.5.4, last paragraph: Instead of "selected plan", it should read "recommended plan" (see P. 2-21).
2. P. 2-15: 15.3 inches of mean sea-level rise projection for 2064 seems appropriate, but it would be informative if it were related to the 100-year and 200-year stage in the Delta (i.e. at Burns Cutoff gage). FEMA funded a study to determine 100-year flood stage in the Delta near Metro Stockton. The study determined that the 100-year flood stage at Burns Cutoff gage is 9.4 NAV88 and 9.5 NAV88 for 200-year. For the Smith Canal Gate design, a 200-year BFE of 9.5 was used plus 1.4 feet of SLR and 1.1 feet of uncertainty plus 3.0 feet of freeboard for a top of wall elevation of 15. For the BWFS, what was used for 200-year BFE, SLR and CC?
3. P. 3-8, 2nd bullet: Add Lathrop and Manteca to Stockton and Merced.
4. P. 4-2, last paragraph, last sentence: It states: "Costs do not include levee improvements needed to mitigate for downstream stage increases." But, Table 4-3 on P. 4-12, lists "Downstream levee improvement costs". If the costs are available, they should be included in all relevant tables.
5. P. 4-11, 3rd paragraph: See #4.
6. P. 4-13, "Paradise Cut Findings", 3rd bullet: Reducing the stages in the Lower San Joaquin River would also be effective in reducing flood stages for Central Stockton (i.e. RD 404).
7. P. 4-14, last paragraph: Figure 2-3 instead of 2-4.
8. P. 4-24, Table 4-9: The meaning of the "Local" column is unclear.
9. PP. 5.5 – 5.9, Section 5.1 "Stockton Levee Improvements": This section needs major editing.
 - a. Bear Creek and the areas north of Mosher Slough were screened from the Lower San Joaquin River Feasibility Study because improvements did not

meet USACE criteria (BCR less than 1). They should not be excluded just “because their benefits could not be accounted for.” For example, Merced is included without any study.

- b. Upstream improvements on the Calaveras River and the Stockton Diverting Canal, included in Alternative 8a, were excluded from the NED/recommended plan because Alternative 7a had the highest net benefits and “where two cost effective plans produce no significantly different levels of net benefits, the less costly plan is to be the NED plan, even though the level of outputs may be less.” These upstream improvements are still needed for 200-year protection for North and Central Stockton.
 - c. The exhibits and project descriptions for Options A, B, and C need clarification. Since the assumed future without-project is the recommended plan (Alternative 7a) in the Lower San Joaquin River Feasibility Study, these options should only include additional improvements to account for SLR/CC. It is our understanding that the closure structures at Smith Canal and Fourteen Mile Slough and the levees along the western front of North and Central Stockton account for SLR. The only necessary improvements in North and Central Stockton to account for SLR/CC should be the Calaveras River, Stockton Diverting Canal, and the San Joaquin River. In addition, improvements to Bear Creek and the area north of Mosher Slough may be necessary to account for SLR/CC.
10. P. 5-10, Options A – E: It notes that these options meet ULDC requirements for 200-year flood event with projected climate change. Do they also account for SLR? Cite the reference where deep floodplains are defined as 6 feet or higher.
 11. P. 5-13, Table 5-4: Under “Life loss reduction” it assumes “no future growth” which appears to conflict with the following “Developable area”.
 12. P. 5-28, Figure 5-9: Showing Dos Rios/Hidden Valley Ranch and Three Amigos on the map would be helpful for the reader.
 13. P. 5-38, Table 5-12: See #8.
 14. P. 6-2, Stockton Levee Improvements (Option A): See #9. Also, delete Mosher Slough closure structure.
 15. P. 6-14, Table 6-2: How is it possible that all alternatives have the same annual O&M and Repair Costs of \$28 million? For example, SJ-D projects include Newman Diversion and Mid Valley Canal at a cost of over \$4 billion. These improvements alone would probably cost more than \$28 million per year to maintain.
 16. P. 6-19, Section 6.4.6 “Cost Efficiency”, last paragraph: See #15.
 17. P. 7-3, Table 7-1: Option A should be noted as the minimal SSIA in the 2012 CVFPP for RD 17. Earlier (see #10), it notes that all of the options for RD 17

account for SLR. Should include Option C for RD 17. RM 52 is listed separately but is discussed on P. 7-4 as part of Option C.

18. P. 7-4, 1st bullet: See #9.
19. P. 7-4, 2nd bullet: States that this option is included in the State Recommended Plan, but it is not shown in Table 7-1. RM 52 is discussed as part of Option C but listed separately on Table 7-1.
20. P. 7-9, Section 7.3.6 Cost Efficiency, 3rd paragraph: See #15.

Comments to Appendixes:

21. P. 2-9, Table 2-1: See #9.
22. P. 2-11, Option A – Fix-in-Place: It states that it meets ULDC requirements for a 200-year flood event with projected SLR and CC. This is not consistent throughout the report. At the October 14, 2016 CVFPB Climate Change Workshop, it noted that the peak water surface elevation in the San Joaquin River south of French Camp Slough will be greater than 7 feet higher because of climate change. Will Option A meet ULDC requirements with that water surface elevation? Also, did the modeling assume that the increased flows from climate change would be contained within the leveed channel? Or, since the left levee is significantly lower than the right levee, did the increased flows overtop/fail the left levee thereby reducing the predicted peak water surface elevation in the channel?
23. P. 2-21, Section 2.4.1 System Configuration SJ-A – 2012 CVFPP SSIA, 1st bullet: See #9 and #14.
24. P. 2.35, 1st bullet: See #9 and #14.
25. P. 5-9, Section 5.5.2: Should be City of Stockton.
26. P. 5-17: See #2.
27. P. 6-7, Section 6.5, 2nd sentence: Editing would clarify it.
28. P. 6-11, Attachment 6A: missing
29. P. 7-4, 3rd bullet: Figure 7-6?
30. P. 8-19, Figure 8-11: See #12.
31. P. 8-27 - 8-31: See #9 and #14. Also, bridges do not need to be raised as long as there is adequate levee freeboard upstream and downstream.
32. P. 8-38, Section 8.3.7, 1st paragraph: RM 52.
33. P. 8-41, Figure 8-26: This shows a 200-year peak water surface elevation with climate change that is significantly less than 5 feet which contradicts the greater than 7 feet at the October 14, 2016 CVFPB Climate Change Workshop (see #22). It notes that “On the downstream portion of RD17, the raised levees actually caused a decrease in WSEL due to flow being pushed toward the western part

of the Delta instead of downstream through RD17.” It would be informative if the horizontal and vertical extent of this flooding in the western part of the Delta be shown since it may impact critical infrastructure such as Highway 4 and water conveyance facilities. Also, if the improvements in RD17 are not constructed, what will be the horizontal and vertical extent of this flooding on Central Stockton?

34. P. 8-47, 3rd line: current population of 46,000.
35. P. 8-47, Section 8.4.2, 5th bullet: P. 5-10 says “projected” instead of “current” climate change and SLR event.
36. P. 10-6, 3rd paragraph: It notes “Because the RD 17 Improvements.....were identified and evaluated later....These concepts were developed without review from regional stakeholders.” When will this occur?
37. PP. 10-68 – 10-73: See #12.
38. Appendix 16, Design and Cost Estimates:
 - a. P. 16-22 and Table 16-8 states the first cost of 7a at \$800 million. It should be corrected to \$1,234,565.
 - b. Table 16-9 states the cost of Calaveras River and Stockton **Diverting** Canal for Option C as \$51.1 million and the Remaining Area as \$6.6 million, but the detailed cost estimates that follow show \$51.1 million for Delta Front Levees Section and \$6.6 million for Calaveras River Section.
 - c. On the Stockton West Levee profiles for 200-year + SLR it shows this profile on Shima Tract varying from 8.0 to 10.0, and on Wright-Elmwood Tract at 7.7 for a portion and then about 9.8 for the remainder. It is our understanding that the USACE Alternative 7a has a much higher elevation to account for wind fetch/wave run-up on these levees.
 - d. On the Stockton Delta Front Calaveras River to French Camp Slough (Right Bank Stationing) – 200 year + SLR, the Smith Canal Closure Structure is shown at the wrong location. It should be shown from the end of Dad’s Point to the Stockton Golf and Country Club.
 - e. On the Stockton West Levee profiles for 200-year + SLR + CC---see 38c.
 - f. On the Stockton Delta Front Calaveras River to French Camp Slough (Right Bank Stationing) – 200 year + SLR + CC---see 38d.
 - g. On the Stockton West Levee profiles for 200-year + SLR + CC + Storage--see 38c.
 - h. On the Stockton Delta Front Calaveras River to French Camp Slough (Right Bank Stationing) - 200 year + SLR +CC + Storage---see 38c.

The implications of the SLR and CC analysis are especially critical for the San Joaquin Basin. We recommend that an independent peer review be undertaken to insure the projections are based on sound engineering. For example, why does CC have such a pronounced effect on the Calaveras River since it has a very low elevation watershed

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with no snow pack? In addition, it is our understanding that historical high flows in the San Joaquin River have resulted from a “pineapple express” rainfall event falling on a significant snow pack in the southern Sierra. With CC resulting in less snow pack, why do projections show significant flow increases?

The BWFS and the 2017 CVFPP should discuss how SLR and CC projections will impact state investment and permitting decisions now and in the future.

In addition to our comments contained in this letter, we have included additional detailed comments as an attachment. We request that these additional comments also be considered by the BWFS team.

Thank you for giving us the opportunity to comment. Please contact us if you have questions or would like to discuss our comments.



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ATTACHMENT -- ADDITIONAL COMMENTS TO OCTOBER 2016 STAKEHOLDER DRAFT OF THE SAN JOAQUIN RIVER BASIN WIDE FEASIBILITY STUDY

Comment No.	Section, Table, Fig.	Additional Comments
1	1.5.5	Need to add 2 bullets: 1) Changes in river gradients, affecting carrying capacity for water and sediments; 2) Changes in canal, pipeline, and road vertical alignments, affecting carrying capacities and structural integrity.
2	2.1	7 th paragraph, last sentence should be modified to add Bear Creek, Mosher Slough, and French Camp Slough to flood risk sources for Stockton.
3	2.2.1	Under the sub-heading "Flood Risk to People, Property, and Infrastructure", 5 th paragraph: The last sentence presumes that flood ag fields <i>should be</i> pumped out. Other multi-benefit discussions in the document say that flooded field recharge of groundwater is a good thing, and will help to reduce subsidence.
4	Figure 2-7	Future development clouds are misplaced. Stockton is not planning substantial growth to the east of Highway 99 or in the French Camp Slough area. Growth is planned in Atlas, Shima, and Bishop Tracts, and north Stockton. In addition, Lathrop and Manteca growth is not shown on the figure.
5	Table 2-1	A note is needed to clarify that stages are for Golden Gate Bridge, and not in the Delta.
6	2.3.4	The future without-project (FWOP) condition states this should represent projects <i>recently constructed, currently authorized, funded, permitted, and/or under construction</i> . We agree, with the exception of currently authorized. The Lower San Joaquin River Feasibility Study (LSJRFS) Alternative 7a (recommended plan) does not meet any of the conditions above. Projects that should be included in the FWOP are: Smith Canal Gate, RD 17 Phases I, II, III, Paradise Cut Option A (base case), SJRRP, and funded portions of the Dos Rios and Three Amigos projects. Paradise Cut and SJRRP are court settlements and should be considered mandates. Dos Rios and Three Amigos have received commitment of various grants to advance those projects.
7	Table 3-1	<ol style="list-style-type: none"> 200-year and 100-year level of protection metrics are odd. Do these refer to stage reduction on land or in the river? Why are these needed? Metrics for reduce flood damage and reduce life loss are more explicit. Reducing stage by 0.5' may be significant if freeboard is only 1', but it's not so significant if freeboard is 7'. Objective: Ecosystem processes, category: floodplain inundation. Does this objective conflict with the SJRRP, which aims to keep the river contained? Objective: Species. This metric is odd. Number of benefitting species implies that 2 is twice as beneficial as 1, but a project which benefits a single endangered species may be very important.

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		4. Objective: Promote agricultural stewardship. What does “converted” mean? Converted to houses, converted to habitat, converted to row crops?
8	3.1.1	Revise text; River Islands is part of the City of Lathrop.
9	3.4	The bullet list should include “onstream storage”
10	4.1	Judging performance based on stage reduction at Mossdale Rd. is insufficient as stage benefit rapidly changes. Need to show stage changes at other representative locations such as Howard Rd. and Highway 4. The conclusion says Paradise Cut helps south Stockton, but this is not demonstrated.
11	4.1	Not including hydraulic mitigation facilities and costs biases the evaluation in favor of the largest Paradise Cut expansion options.
12	4.5	<ol style="list-style-type: none"> 1. A bullet is needed to highlight CC and what is needed to tackle this. 2. There are no bullets for multi-benefit or restore ecologic functions. 3. Why no bullets for regional elements like Stockton levees and RD 17 levees?
13	Figure 5-1	<ol style="list-style-type: none"> 1. Stockton levee improvements need to include Bear Creek improvements. 2. DWSC/McLeod Lake needs a perimeter floodwall or placeholder note that something is needed to prevent flanking in this area. 3. New Hogan box should include bullets for “FIO” and “add flood storage”.
14	5.1	<ol style="list-style-type: none"> 1. Footnote 2 states that measures to prevent flanking from backwater flooding in the DWSC were not included because it was difficult. We suggest a placeholder of a perimeter floodwall, or a note added to say that dollars have been included to cover an unknown fix. 2. The last sentence is confusing. We suggest “Also, hydraulic impact analysis found no downstream hydraulic impacts with any of the options because all channels terminate in the Delta pool.”
15	Figure 5-2	<ol style="list-style-type: none"> 1. As part of adding facilities for Mosher Slough and Bear Creek, a gate at Mosher Slough in lieu of the levee and floodwall work and bridge closures should be considered. 2. Bridge closures at Mosher and I-5 are not reasonable. 3. See comments for Appendix 16 and conform this figure. 4. The key threat is flooding from the Delta under SLR+CC, which will fail most islands to the west and expose the Delta front levee to severe wind setup and wave runup. The design water surface should be uniform across the Delta Front levee, so we would expect to see continuous work along the Delta Front from Bishop Tract to RD 404, including the RD 404 dryland levee, Tenmile Slough, right bank Lower Calaveras downstream of I-5, RD 1614 along Stockton Golf and Country Club, and DWSC/McLeod Lake.

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		5. For RD 404, we suspect that levee raise would be preferred over a floodwall for most of its length. The improvements don't extend east far enough along French Camp Slough to prevent flanking.
16	Table 5-3	This table says 9,600-10,100 lives are saved in a 200-year event for the 3 options, which means the FWOP condition would result in at least 10,000 fatalities, even after completion of the USACE Recommended Plan. This cannot be correct.
17	Figure 5-4	The blue line on the figure should be channel enlargement; no levees are intended for the Mormon bypass.
18	5.7	Text correctly notes that under FWOP conditions, these areas flood, and the flooding is beneficial. So why consider \$2.2 to 3.6 billion purchase of the flood-prone ag lands? No additional benefits are achieved through the expenditure.
19	5.12	The premise of this section and table 5-12 seems to be that options for each area were selected assuming that no system-wide components would be used. The text for section 5.12 needs to more clearly define the limitations of this evaluation.
20	Table 5-12	<ol style="list-style-type: none"> 1. This is an important table and SJAFCA would like to engage in a workshop with the BWFS team to discuss the evaluation. 2. Why doesn't RD 17 option B show 3 checks in flood risk management? 3. Why don't all three RD 17 options show checks for ecosystem functions when they all have the Old River setback with 131 ac of restoration? 4. Why does RD 17 option E have checks for multi-benefit? 5. Costs for LSJRFS Alternative 7a should be added. 6. Performance keys can be misleading. Stage reduction and stage increase are both indicated the same way. Should it be noted that stage reductions are based on hypothetical levees holding conditions?
21	5.13	The 3 rd bullet refers to "significant life loss" in the FWOP condition. The BWFS projection is 2,586 deaths in a 200-yr flood, which exceeds the hurricane Katrina death toll of 1,836 by 40%. Note: 2,586 is the number from Appendix 12. Table 6-2 says the FWOP death toll would be 4,752.
22	6.3.1	<ol style="list-style-type: none"> 1. 1st bullet, states closure structures are included for Smith Canal, 14 Mile Slough, and Mosher Slough. But the Smith Canal and 14 Mile Slough closures are included in the LSJRFS recommended plan, and therefore are part of the FWOP condition. The Mosher Slough closure is a concept worth exploring in conjunction with extending improvements north into Bishop Tract and Bear Creek, but it doesn't appear to be a feature in any of the options in Appendix 16. 2. Paradise Cut base case should be part of FWOP.
23	Table 6-1	<ol style="list-style-type: none"> 1. Alternative SJ-D should include 200 TAF of new storage on both the Tuolumne and Merced rivers.

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		2. SJ-C should have a different RD 17 option than SJ-B, one which is downsized due to new upstream storage.
24	Table 6-2	1. Loss of life numbers don't match Table 12-4 or 12C-2, and don't comport with Table 5-3 or Table 12-2. 2. Need to footnote that some costs are partial, such as storage elements in SJ-C, and Paradise Cut downstream mitigation for SJ-D. FIO costs have not been added in, but these could be significant, considering that the Folsom JFP was to facilitate FIO.
25	Table 7-1	1. Need to note that FIO costs are not included as these could be significant. 2. None of the RD 17 options are checked, but the text states Option C is included in the Recommended Plan.
26	Appendix 5, 5.5.2	Title should refer to latitude of Vernalis.
27	Appendix 5, 5.8	The text is not clear on how the RMA Bay Delta model handles overtopping and/or failure of Delta levees.
28	Figure 5-18	Regulated FWOP 200-year San Joaquin River flows at Vernalis with climate change do not exceed 339,000 cfs, yet the smaller flood represented by this figure shows a regulated river hydrograph at the Port of Stockton peaking at 660,000 cfs. The flow at the Port should be a fraction of the flow at Vernalis, not a multiple.
29	Appendix 7	The text is not clear on how the RAS model handles overtopping and/or failure of Roberts Island levees.
30	Appendix 9, 9.4.7	The Recommended Plan includes new storage on the Tuolumne, Merced, and San Joaquin Rivers in the amounts of 200, 200, and 100 TAF, respectively, yet Table 9-13 does not include the storage. There is no explanation of why the new storage was dropped from the Recommended Plan.
31	Appendix 9, 9.5	The conjunctive use strategy assumes no changes in rule curves, yet the description points to exactly that, e.g.: "lowering the top of the conservation pool". This is a rule curve change.
32	Appendix 11, Table 11B-2	Why are Stockton and RD 17 warning times zero hours? The FWOP condition includes completion of the LSJRFS recommended plan and the River Islands super levee, so brittle levee failure would be improbable, leaving overtopping as the dominant failure mode. Overtopping can be forecast days in advance for both areas
33	Appendix 11, Table 11E-1	Why are Stockton with-project damages so high for the 100-year flood? CS-1 benefits are very low.
34	Appendix 11, Table 11E-2	Why are Stockton with-project damages for the 200-year flood nearly the same as for the 100-year flood?
35	Appendix 12	There are inconsistencies in the life loss numbers between 12.6.1 and Table 12C-2.
36	Table 12A-1	See #32 above.

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37	Appendix 12	Life loss calculations and assumptions basically conclude that since Stockton and RD 17 have a zero warning efficiency, 100% of the residents in all the houses remain there throughout the entire flood, and if the water eventually rises to a depth of 9' for someone over 65 or 20' for someone under 65, then 91% of the people in the house eventually die, regardless of how long the water takes to get to the house, and how slowly the water rises. This does not seem reasonable.
38	Appendix 12	As a result of the BWFS Recommended Plan, Stockton would still suffer 150 fatalities in a 200-year flood which is still a large number.
39	Appendix 16, 16.6.1	<ol style="list-style-type: none"> 1. Stockton levees do not include DWSC/McLeod Lake flanking protection. 2. Numerous issues with the Stockton levees improvements included as part of the BWFS Recommended Plan (e.g., interpretation of the USACE recommended plan, alignment of the Smith Canal gate, DWSE of the various reaches of the Delta front, required levee raises, etc.). We'd like to work with DWR to resolve these issues.
40	Appendix 16, Table 16-10	Option C shows 2,317 ac easement, which is not included in the verbal description or graphic.
41	Appendix 16 plan & profile sheets	<ol style="list-style-type: none"> 1. Calaveras Option A. Cherokee Rd. is shown with closures, but the bridge was designed with sealed parapet walls so that the bridge acts as an inverted siphon. 2. Mosher Option A. Downstream WS equals 8, which is different from Calaveras Option A (downstream WS equals 10.8). Both should be equal. Mosher Option A also shows closures on I-5 bridges, Kelly, and Mariners, but no freeboard deficiency would drive this need. 3. Delta front Option A. DWSE varies from 7.7 to 9.8. South of the Smith Canal gate, it is a level pool at 10.8 up to French Camp Slough, and then jumps to 12.2 in French Camp Slough. We do not understand the rationale for these numbers. 4. Delta front Option A. The wrong Smith Canal gate alignment is shown. 5. Similarly, for Options B, C, Delta front water surface varies too much, and we do not understand the water surface profile in the LSJR and discontinuity at the mouth of French Camp Slough. 6. Various locations: Levee raises, bridge raises or closures are shown where the drawings would indicate that adequate freeboard exists. 7. RD 17 drawings do not indicate what work is contemplated; levee is just indicated by "lateral weir". The Walthall Slough levee does not appear to be tied into high ground. 8. RD 17 water surface profiles for Options B and C are the same, yet with-storage Option C should be lower.

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42	Appendix 16 costs	For RD 17, it is counterintuitive that climate change only increases the cost from \$395M to \$428M, when flows nearly triple with climate change.
43	Appendix 17	<ol style="list-style-type: none">1. Shading on maps is difficult to discern.2. We are surprised that baseline 100- and 200-year floodplain maps do not show flooding of Roberts Island or the other Delta islands.3. Similarly, the baseline Stockton 200-year floodplain map does not appear to reflect enough flooding.4. No Bear Creek flooding is shown.