Cyndie Martel

From: Garril Page (POP) <obility@comcast.net>
Sent: Sunday, November 9, 2025 12:13 PM
To: Julie McMillan; Elizabeth Robbins; Teri Dowling; Mathew Salter; Bill Kircher
Cc: Cyndie Martel
Subject: [EXTERNAL] Agenda Item 12, November 13, 2025
Attachments: Proposed Mitigations page.eml

All longtime employees recognize that reassurance and good news are welcome to risk aversive ears. This email is not good news, but I endeavored to make it as accessible and straightforward as it is essential. I hope you will scan through to the end, taking note of the honest and disconcerting Disclaimers and disclosures in the report prepared by the flood district's consultant.

I send this because of the flood risk assessment being presented to you such as "While there may be certain limitations related to the overall accuracy of the "1D" modelling used by the NFIP to develop these studies, they are still considered useful for NFIP communities such as Ross to identify flood risk, which can facilitate the development of effective flood control capital projects and regulate residential construction within flood prone areas."

There is a massive information gap between "..certain limitations related to their overall accuracy... " and "...useful" when discussing the value of the models involved. That there is up to three feet of increased water surface elevation between the 1D and hybrid 1D2D models, indicating greater volume and flow forces is documented. That WSE increase and the subsequent associated impacts should not be obscured. The Staff Report's *pro forma* inclusion of :
"**Fiscal, resource and timeline impacts:**
There are no fiscal impact associated with this item..." seems inappropriate.

It is natural to want to place confidence in consultants, to the accept the recommendations of administrative agencies. In assessing reports of the Flood District, FEMA and CLOMR, please, keep the following in mind the following letter sent to San Anselmo Town Council. Any structural failure in San Anselmo has direct consequences for those downstream.

Thank you,
Garril Page

September 26, 2025

San Anselmo Council Council Members:

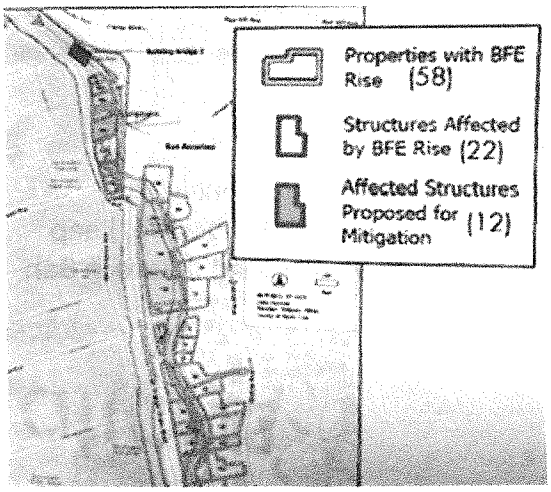
Did you know there is a district-mitigated structure on San Anselmo Avenue deemed unable to with stand the forces of SAFRR's modeled 100 year flood?
I am concerned there is inadequate awareness of hazards to San Anselmo structures, especially the commercial district, and request the Council's attention to review of short-comings in the CLOMR MT-2 Application.

Appendix B. Martin/Martin Report fully discloses the alarmingly limited nature of their structural assessment. In both Martin/Martin's **Structural Implications of BB2 Removal** and two Advisory Board Zone 9 Flood District handouts from their August 21,2025, meeting, one endangered, inadequately mitigated structure is glaringly obvious. #540 San Anselmo Avenue (see penciled arrow in Figure 1 below) is identified as needing mitigation and being "A structure supported within the bed of San Anselmo creek is not able to withstand forces associated with the modeled BFE rise".

However, the MT-2 Application where other downtown structures not evaluated for scour or assessed beyond visual observation are deemed to meet the acceptable structural performance threshold with minimal code-required reinforcement, #540 is lumped wrongfully into in the 546-538 structural mitigations. The mention that #540 San Anselmo Ave remains unable to withstand the 100 year flood and *not acceptable* even with recommended reinforcement measures and Proposed Mitigation is not discovered except by careful matching of AB's material with the MT-2 Application.

Exhibit No., 23: 546-538 San Anselmo Ave., San Anselmo and **Figure 1. Map of Rise, Effect, and Mitigation Results** below indicate 540 San Anselmo Ave needs mitigation and describe "reinforcing Fiber-Reinforced Polymer (FRP) layering on wingwalls to increase strength and durability."

Compare those with the attached handout Proposed Mitigations from the Zone 9 AB meeting below with "A structure supported within the bed of San Anselmo Creek is not able to withstand forces associated with the modeled BFE rise". #540 is not named as unable to survive the project's modeled 100 year flood.



It is by slogging onward through the Martin/Martin Report to **Concrete Columns Conclusions**, research identified the threatened structure as 540 San Anselmo Avenue and performance of 540 San Anselmo Ave "is deemed *not acceptible.*"

Obviously, greater concern is warranted for 540 San Anselmo Avenue. Yet nowhere in the MT-2 Application *except* the one reference above would indicate 540 SA Ave would not perform acceptably. The more detailed excerpts below confirm that even with the inclusion of minimum code required reinforcement the wall (540 SA Ave) "does not a have adequate reinforcing to withstand the

modeled 100 year flood flood loading" and that "Further recommendation and retrofit design are beyond the scope of this report..."

Why is this serious lapse in disclosure not more evident? How many of you understood both the mitigation failure and also the extreme limitations of the Martin/Martin Structural analysis of San Anselmo's buildings? This firm has given in full disclosure regarding the limited scope and resultant worth of its **Structural Implications of BB2 Removal**, but the flood district appears far less so.

Please, take the time to review the excerpts below and make your own judgement about the safety of San Anselmo structures post-BB2 demolition proposed by the flood district. As Council Members, it is essential you be fully informed and aware about the district's proposals.

I am available to answer questions about materials I send you. Please, feel free to contact me. Thank you.

Garril
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Research:

BB2 MT-2 Application
Section Title
A. Flood Analysis Calculation, A1
B. Flood Analysis Models, B1

Appendix B Martin/Martin
Structural Implications of BB2 Removal, July 9 2025, pages 5 -10:

3. Foundations and Scour Not Assessed
We did not evaluate the condition, type, or capacity of the existing foundation systems, nor did we assess for potential scour or undermining that may occur due to increased creek flows. These conditions are crucial to structural performance and are outside the scope of this evaluation.

Scour, the erosion of soil around foundation elements due to high-velocity water flow, is a leading cause of structural failure in flood prone environments. Shallow foundations, such as spread footings, are especially susceptible to scour, which can result in settlement or complete loss of support. While deep foundations like piles offer more resilstence, they too can be compromised if erosion is significant or if undermining occurs around pile groups.

At this time, the specific foundation types supporting the evaluated elements are unknown. No construction drawings or documentation exist to confirm whether the columns and wing wall are supported by shallow or deep foundations. A meaningful assessment of scour risk and foundation integrity would require both a geotechnical investigation and physical exposure (e.g.. selective excavation or test pits) to verify the existing foundation depth, configuration, and material condition. Without this information, no conclusions can be made regarding the structural adequacy or vulnerability of the foundation systems under revised flood conditions.

4. No Connection Analysis
The assessment did not evaluate top or bottom connections (e.g., between column and framing above or foundation below). Load transfer mechanisms and structural continuity have not been confirmed.

5. Limited Conditions Assessment
The existing material and concrete quality at the column locations were not formally assessed as part of this study. However, visual observations identified signs of deterioration at several locations, including exposed aggregate and surface cracking. For the purposes of analysis, a cracked concrete section was conservatively assumed, but no material degradation factors were incorporated into the calculations,

To better characterize the structural performance of the creek structures, we recommend a more comprehensive evaluation of each column's condition. Expanding the assessment beyond the three representative cases studied in this report would provide a more accurate understanding of existing conditions and inform future repair retrofit strategies.

6. No Drawings or Testing
No original engineering drawings or original construction documentation were available for review. No field testing (e.g., GPR scanning for rebar, concrete testing) has been performed. All assumptions were made based on visible geometry and assumed plain (unreinforced) concrete conditions...

Concrete Column Conclusions:

Using the Flood Control District-supplied flood velocity...574 SA Ave would not perform acceptably...528 SA Ave would not perform acceptably...510 SA Ave...the inclusion of minimum code - required reinforcement renders the column acceptable...

540 SA Ave would not perform acceptably...The evaluation confirms that even with the inclusion of minimum code required reinforcement the wall [540 SA Ave] does not a have adequate reinforcing to withstand the modeled 100 year flood flood loading... Further recommendation and retrofit design are beyond the scope of this report...

LIMITATIONS:

This assessment ...is not intended as a comprehensive structural evaluation or certification of safety. This report presents a limited structural assessment based on visual observations, assumed loading, and representative conditions only..no testing, excavation, or verification of hidden conditions (e.g., foundation type, reinforcement, or connection details) was performed....Martin/Martin has not a evaluated all potentially affected structures or components, and no conclusions are provided regarding their overall condition and performance...If a broader understanding or greater certainty is required, additional site specific inverstigation and analysis should be undertaken.