Cyndie Martel

From: Ann Politzer <annpolitzer@gmail.com>
Sent: Tuesday, November 11, 2025 11:46 PM
To: Cyndie Martel
Subject: [EXTERNAL] Written comment for 11/13/25 Ross TC Meeting Agenda Item #12
Attachments: Benefit cost analysis table summary.pdf; Ann Politzer BB2 Question 91825 meeting.pdf

Dear Ms. Martel,

I am forwarding an email that I would like you to add to the written comments for the 11/13/25 Ross Town Council meeting re: Agenda Item #12. I've already sent this email to the individual council members, b but I would be very appreciative if you attached it to Agenda Public Comments for the 13th.

Thank you for your help.

Sincerely,

Ann Politzer
San Anselmo

11/13/25 Ross TC Meeting, Agenda Item #12
Dear Ross Town Council Members,

Like you, I have many unanswered questions about the current benefits and detriments of the San Anselmo Flood Risk Reduction project, particularly surrounding the CLOMR and the planned removal of Building Bridge 2. At the County's request, I met last month with An Bartlett, the County engineer on the SAFRR Project and Kurry Foley, the County's Assistant Public Works Director, to get some answers. I didn't get many, but I did get two pertinent pieces of SAFRR information: the Benefit Cost Analysis for the SAFRR Project/BB2 removal and the false rationale behind the County's inaccurate claim that mitigation-impacted Ross properties have previously flooded.

The gist of it: The Benefit Cost Analysis shows that loss/damage reductions from BB2 removal are abysmal: a 1.65% reduction in loss/damages in the 100 Year Flood for San Anselmo. Given that the SAFRR expenditures thus far are either $52.1 million (per County estimate, December 2022) or $49 million (per Chris Blunk in recent public meetings), the Benefit Cost Ratio for the project is 0.127—an investment return of about $0.13 per taxpayer dollar.

Regarding the County's false assertion, also stated by Judd Goodman in the Marin IJ article of 9/8/25*, that all 11 Ross properties due mitigation from the water rise caused by BB2 removal have already flooded: the County based that statement on the assumption that the 11 impacted properties have pre-existing NFIP claims on file for previous flood damage. This not universally true. It was evident from our conversation that this inaccurate assumption somehow influences the County's concept of mitigation and lack thereof. I did not get specifics.

I am copying you here on my email response to the County, which breaks the issues down into questions. Please read it. I have also included attachments containing the BCA that An Bartlett shared with me as well as a file listing the question that the County is unable to answer.

Both the CLOMR and BB2 issues are time-sensitive. FEMA is finishing up its CLOMR review and will soon get back to the County. FEMA reps say they are essentially a partner with the County in the process. Beyond FEMA checking the boxes, FEMA says that final decisions rest with the Councils.

Please, ask the County the nitty gritty questions—and demand answers. You will be the ones to approve CLOMR sign-off. You need to know what you are really getting here.

Thank you so much for both your consideration and your service to the Community.

Sincerely,

Ann Politzer
San Anselmo

From Ann's letter of 11/3/25 to the County and BOS:

1. The County has stated that all downstream properties requiring mitigation from BB2 removal have previously flooded. This is inaccurate. You mentioned that this statement was supported by flood claims on file with the Town of Ross. My questions are as follows:
    - As the government agency making this statement, do you have NFIP claims in hand for each impacted property?
    - If not, and this statement was made without documentation, can you contact the Town of Ross to obtain copies of any related flood claims for those 11 or 12 properties to substantiate your position?
    - Will you share copies of your findings with the individual homeowners?
    - If, as expected, the evidence shows that the County's statement is untrue, will you revise any mitigation assumptions based on that inaccuracy and adjust the CLOMR accordingly?
2. My next question is both ethical and factual. Per my request, you kindly sent me a copy of the BCA table for the BB2 removal project—a document that neither I nor other concerned community members had seen before. Up to now, all benefit-cost ratio figures distributed by your department have referenced the 10-year flood. However, Ross Valley experiences roughly a calibrated 100-year flood every 25 years. Since the CLOMR is predicated on the 100-year event, benefit numbers based on a 10-year flood are only marginally relevant and risk misleading the public about the project's true value.

According to your BCA table, here are the actual figures for risk reduction in San Anselmo from the BB2 project using the required 100-year metric:

- Existing damages (with BB2 in place): $399.89 million
- Damages after BB2 removal: $393.28 million
- Benefit: $6.61 million (a 1.65% reduction)

Given that the total reported cost for the Sunnyside Basin and BB2 removal is $52.1 million (per County estimate, December 2022) or $49 million (per Chris Blunk in recent public meetings), the Benefit Cost Ratio for the project is 0.127—an investment return of about $0.13 per taxpayer dollar. Any ratio under 1.0 indicates that costs exceed benefits, leaving the SAFRR project economically unsound.

This poor return is compounded by the fact that BB2 removal changes neither the number of essential structures flooded nor significantly reduces flood depths. The FEIR data shows only a 5-inch decrease from the 4 feet of floodwater typically affecting San Anselmo in a 100-year event, leaving an inundation depth of approximately 3 feet 7 inches. (All referenced data is included in the attachment.)

The obvious question is: When will the County Flood District present the full truth to the public?
The less obvious one is: What is happening with the numbers?

The District's SAFRR FAQ page lists BB2's cost as $11 million and claims $23 million in benefits over a 50-year project life. Yet, to date, FZ9 expenditures—totaling around $49–52 million—have yielded little meaningful flood mitigation for San Anselmo during a 100-year flood. Moreover, applying a 50-year amortization to inflate projected benefits is flawed, as SAFRR is not a continuously utilized infrastructure project; it serves an intermittent purpose aligned with rare flood events. The $23 million figure appears speculative at best, and perhaps the result of creative public relations rather than engineering analysis.

Lastly, how did the County's reported project expenditures drop from $52.1 million in December 2022 (per the Flood Zone 9 Fee Revenue and Project Expenses chart) to $49 million in recent statements by Mr. Blunk? Given the absence of a current, transparent accounting for FZ9 projects and the inconsistencies in BB2's reported cost-benefit data, I ask that you provide the public with a complete, up-to-date cost breakdown and budget for all FZ9 projects to date.

As Supervisor Mary Sackett once said to Tracy Clay during a prior Board of Supervisors flood budget meeting: "Don't give me any more incomplete budgets."

Thanks for all your help and I look forward to hearing from you.

Sincerely,

Ann Politzer

Table from 2018/23 FEIR Addendum Appendix A, showing minimal reduction in inundation levels:

TABLE 5
CHANGE IN FLOOD INUNDATION DEPTH AND EXTENT IN FAIRFAX AND SAN ANSELMO COMPARED TO EXISTING CONDITIONS [a]

Flood Event	Location	FEIR (Approved) Project			Modified Project		
		Maximum Inundation Depth Reduction in the Floodplain (inches)	Change in Inundation Extent	Inundation Depth Increase in areas of new flooding (inches; where relevant)	Maximum Inundation Depth Reduction in the Floodplain (inches) [b]	Change in Inundation Extent	Inundation Depth Increase in areas of new flooding (inches; where relevant)
10 Year	Fairfax	17	reduction	--	4	reduction	--
	Upper Downtown San Anselmo	20		--	13		--
	Lower Downtown San Anselmo	20		--	19		--
25 Year	Fairfax	2	nearly zero	--	4	nearly zero	--
	Upper Downtown San Anselmo	6		--	4		--
	Lower Downtown San Anselmo	6	minor increase	4	4		--
100 Year	Fairfax	4	nearly zero	--	1	nearly zero	--
	Upper Downtown San Anselmo	5		3	3		--
	Lower Downtown San Anselmo	5		3	2		--

NOTES:

[a] Changes in flood inundation depth and extent for the modified project use the "corrected existing conditions" as the baseline for comparison.

[b] In Fairfax, the maximum inundation depth reduction for the modified project is lower than identified for the approved project due to the reduced capacity of the FDS basin and new information about Fairfax Creek channel (additional surveyed cross sections and model recalibration).

SOURCE: San Anselmo Flood Risk Reduction Project Final Environmental Impact Report, 2018; Stetson Engineers, 2023 (Appendix A).

https://www.marinij.com/2025/09/08/san-anselmo-council-gets-flood-control-project-update/

Building Bridge No. 2 Benefit Cost Analysis Summary
10/16/2025

INTRODUCTION

The Building Bridge No. 2 (BB2) removal project aims to reduce the extent and depth of flooding, thereby minimizing future damages and associated costs. In 2023, the District applied for a FEMA Hazard Mitigation Grant Program (HMGP) grant. As part of the application, a Benefit-Cost Analysis (BCA) was required to demonstrate the project's cost-effectiveness. The BCA for BB2 was prepared using the *FEMA BCA Toolkit v6.0* to calculate the Benefit-Cost Ratio (BCR). The benefits of the project were estimated to be $23.2M, whereas the capital and maintenance costs were estimated to be $3.9M (based on construction cost estimates), resulting in a BCR of 6.0[1]. A BCR greater than 1 indicates the project is cost effective. The District retained Wood Rodgers Inc., an engineering firm, to prepare the BCA.

The table below provides a summary of the annualized damages and losses ($/year) for 10-

Ross Valley Flood Damages and Losses

Existing

Annualized Recurrence Interval	Damages and Losses	Annualized Damages and Losses
10 years	$203.9M	$15.1M
25 years	$310.2M	$10.6M
100 years	$399.9M	$4.0M
Total		$29.7M

Post-BB2

Annualized Recurrence Interval	Damages and Losses	Annualized Damages and Losses
10 years	$175.3M	$13.7M
25 years	$299.5M	$10.3M
100 years	$393.3M	$3.9M
Total		$28.0M

~6% decrease

Results of the BCA are summarized in the table below. The 10-year storm frequency event has a higher likelihood (10%) of occurring than the 25-year and 100-year frequency events. As shown in the table below, the difference between the 10-year existing and post-BB2 damage is substantial, with an estimated 30 buildings avoiding damage and approximately

[1] The total budget for the BB2 Removal project, including planning, environmental permitting, design, and construction, is estimated to be $11.4M. Adding cost of maintenance, the cost totals $11.9M resulting in a BCR of 2.0 ($23.2M/$11.9M) indicating a cost-effective project.

$28.6 million of building loss and business interruption losses mitigated. Similar trends for reduction of losses follow for the 25-year event ($10.7 million mitigated) and 100-year event ($6.7 million mitigated)

Summary of Benefit Cost Analysis Estimated Flood Damages in Ross Valley for BB2 Removal

Storm frequency	GBS Damage Count	No. of Essential Facilities Damaged	Building Loss ($million)	Business Interruption Loss ($million)	Total Loss ($million)
10-year Existing	169	6	$86.82	$117.08	$203.90
10-year Post-BB2	139	6	$80.76	$94.58	$175.34
25-yr Existing	371	17	$131.77	$178.40	$310.17
25-yr Post-BB2	345	17	$126.37	$173.12	$299.49
100-yr Existing	547	23	$186.21	$213.68	$399.89
100-yr Post-BB2	528	23	$182.15	$211.13	$393.28

GLOSSARY OF TERMS FOR THE BB2 BCA

- **FEMA Hazus Multi-Hazard Flood Module v5.1 (Hazus) software** is a standardized risk assessment software developed by FEMA. It models potential losses from natural disasters such as floods, earthquakes, and hurricanes.

- **FEMA Benefit-Cost Analysis Toolkit v6.0 (BCA Toolkit)**, developed by FEMA, is used to evaluate the cost-effectiveness of hazard mitigation projects by comparing the present value of expected benefits (e.g., avoided damages, reduced losses) to the total project cost using flood damage estimates generated by Hazus.

- **Benefit-Cost Analysis (BCA**) focuses on mitigation benefits at the site and downstream in Ross Valley. The BCA includes reductions in building and content damages, business interruption damages, as well as riparian benefits. The analysis includes (1) using results of the 1D/2D hydraulic model developed by Stetson Engineers, Inc. which was peer reviewed by the US Army Corps of Engineers, to determine the floodplain extent and depths; (2) using Hazus to define general building stock (GBS) and to estimate flood damage; and (3) inputting Hazus results into BCA Toolkit to quantify the BCR.

- **Project useful life (PUL)** is the estimated number of years the project is expected to remain effective. While BB2 could qualify for a 100-year PUL, a more conservative estimate of 50 years was used for the analysis.

- **Project cost estimate (PCE)** refers to the engineer's initial **construction** cost estimate. For BB2, the PCE is $3.4M. Annual maintenance costs are estimated at $34,000, which is approximately 1% of the PCE. The total project cost estimate is approximately $11.4M, which includes environmental, planning, design, construction, and contingency.

- **Work schedule**: the BB2 Project is scheduled to be completed in 36 months.

- **GBS Damage Count** is the number of buildings that were damaged (minimally and moderately damaged or destroyed). GBS data, which includes building types, occupancy classes, and values, was used to estimate physical damage to buildings and contents, exposure of essential facilities to flooding, direct economic losses (business interruptions), and the number of people displaced by evacuation and inundation.

- **Essential facilities** include emergency operation centers, fire stations, hospitals, police stations, and schools. Damages to essential facilities include at least moderate, as least substantial, and loss of use.

- **Building loss** is the estimated cost to repair or replace the building structure, building content and building inventory.

- **Direct economic loss** is the business interruption loss due to flooding damages, which includes income loss, relocation, rental income, and wage loss.

- **Finish Floor Elevations (FFE)** and damage estimates are accounted for in Hazus using census data included in the software. The depth above the FFE is used to estimate damage based on depth-damage functions included in the software.

Source:
Marin County Flood Control District FEMA HMGP application, Attachment 10-BCA Methodology Report, Technical Memo by Wood Rogers Inc., 09/28/2023

Hi An, Hi Kurry,

Here is my list of questions from our 9/18/25 meeting to discuss the SAFRR Project and Building Bridge 2 removal.

The list is divided into three sections: 1) Questions answered in our 9/18/25 meeting 2) Questions that arose during the meeting discussion and 3) Unanswered Questions—questions regarding the SAFRR Project that you were unable answer and to which the County had previously failed to respond.

Thanks for working to answer these questions and for keeping communications open between County Public Works and—me. Email me with any concerns.

Best, Ann

ANSWERED QUESTIONS

1. Q: What is the basis for the County's current benefit claims that removing Building Bridge 2 creates, in the 10 Year Flood, a 14% reduction in loss and damages? Based on what? Loss and damages of what? A: The County's benefit claim of 14% loss/damage reduction in a 10 Year Flood post-BB2 removal is based on a FEMA insurance formula that allows $26,000 for every inch of flood inundation inside a home.
2. Q: What is in the data set—the physical data, stats and methodology—used to determine loss, damage and benefit numbers? A: Those numbers are based on a set of assumptions.
3. Q: Did the County include stats from undone bridge projects listed under Changes of the Foreseeable Project Designs in The Supplemental to the 2018 EIR in their assumptions for risk remediation from BB2 removal? A: No.
4. Q: Can you confirm that in the 100 Year flood, the risk reduction numbers are:
   - 23 properties fully removed from the flood plain
   - 54 properties partially removed from the flood plain
   - 315 with lowered base flood elevation

   A: Yes.
5. Q: If the current 2018/2023 EIR and Addendums are based on the 1D/2D model and FEMA stipulates use of the 1D model for the CLOMR, why did the County submit the CLOMR with an outdated EIR that did not match the data or criteria required for the CLOMR by FEMA? Why did the County not wait or update first? A: The County is writing an addendum to the EIR.
6. Q: Why, when the County has allocated only $400,000 for downstream mitigation, did the County then spend $250,000 to contract with the Sacramento public relations firm Lucas Public Affairs to oversee public imaging for the SAFRR Project? A: That decision predates An and Kurry.

NEW QUESTIONS PER DISCUSSION

1. Is it the County's contention that the County does not need to mitigate water rise against downstream properties facing an increased rise in water level (in this case 3.4-4 inches) occasioned by the removal of BB2 if the water rise impacts below the First Finished Floor? Yes or No?
2. The County has stated that all downstream properties requiring mitigation from BB2 removal have previously flooded. This is inaccurate. You mentioned that this statement was supported by flood claims on file with the Town of Ross. My questions are as follows:

a. As the government agency making this statement, do you have NFIP claims in hand for each impacted property?

b. If not, and this statement was made without documentation, can you contact the Town of Ross to obtain copies of any related flood claims for those 11 properties to substantiate your position?

c. Will you share copies of your findings with the individual homeowners?

d. If, as expected, the evidence shows that the County's statement is untrue, will you revise any mitigation assumptions based on that inaccuracy and adjust the CLOMR accordingly?

3. Can you send me a breakdown of the data contained in the GBS Damage Count from the Benefit Cost Analysis in a readable form? A list of included data might answer many of my unanswered questions regarding the basis of the Benefit Cost Analysis.

UNANSWERED QUESTIONS

1. Who is the County's current FEMA contact? Who are the FEMA team reviewing the CLOMR application? Please forward all contact information, thank you!
2. What does "Partially removed property" mean?
3. How many of the parcels listed as risk reduced are "water on dirt" only, with no water rise at the structure? How many were already water on dirt only?
4. How many of the structures identified in your risk reduction count have an elevation certificate? Please determine any structures possessing an elevation certificate, remove them from your count if they are already above flood and correct you BCA and CLOMR numbers to reflect any update in totals.
5. How many parcels identified as remediated are commercial properties? How many are single residences? How many are multiunit buildings, including apartment building, and how are multiunit buildings represented on your count? How many are empty lots?
6. How many structures identified as remediated post BB2 removal have previously flooded?
7. What are the street addresses of the risk-reduced properties?
8. What are the changes of inundation level post BB2 removal (e.g. 4 feet vs 3 feet 7 inches, etc,) at each affected upstream property in the 25 and 100 Year Flood?
9. Post BB2 removal, how many parcels will still flood in the 25 Year Flood? How many in the 100 Year?
10. Did the County use First Finished Floor to determine upstream water reduction impacts?
11. Did the County use Lowest Adjacent Grade to determine upstream water reduction impacts?
12. Have you run the upstream risk reduction impact numbers with both the hydraulic/hydrologic 1D and the 1D 2D/Hybrid model? If there is a difference in the number of structures experiencing risk remediation between the two models, what is that number? If there is a difference in flood elevation between the two models, what is that number?
13. If you applied the same metrics and methodology to determine the number of downstream properties requiring mitigation due to increased downstream WSE or BFE from the removal of BB2 as you used upstream to determine the number of risk reduced properties post-BB2 removal, would that increase the number of downstream properties receiving mitigation? If the answer is yes, by how many properties?
14. In April and June of this year, the number of risk-reduced properties was identified as 480. Now it is 400. What changed? What number is in the CLOMR?
15. How many inches of floodwater reduction does San Anselmo receive from the as-built Sunnyside flood basin in the 100, 25 and 10 Year Floods? How do these numbers translate into benefits, if at all, for San Anselmo before and after BB2 removal?

16. What are the current maintenance cost for the Sunnyside basin and how much maintenance does San Anselmo pay into that?
17. What are the "assumptions" that FEMA uses to arrive at specific benefit numbers? What goes into the equations?
18. Why is the County offering impacted downstream homeowners wet floodproofing instead of mitigation as required by FEMA? FEMA Technical Bulletin 7 explicitly states that wet floodproofing does not eliminate the exposure of the structure to flooding, and FEMA's CLOMR approval under 44 CFR §65.12 requires that all adverse impacts are mitigated, not simply reduced:

- Wet floodproofing does not eliminate exposure to floodwaters. It is a damage-reduction technique, not a protective measure that restores pre-project conditions. (Source: FEMA TB-7, 2013, p. 2)
- FEMA requires that all adverse impacts from a project causing a BFE rise be fully mitigated as a condition for CLOMR approval. (Source: 44 CFR §65.12(b))
- No rise in flood levels is permitted in the regulatory floodway unless these mitigation requirements are satisfied in full. (Source: 44 CFR §60.3(d)(3))
- Marin County's own ordinance (Chapter 23.09.038) mirrors this requirement, stating: "Prohibit encroachments...within the regulatory floodway unless it has been demonstrated through hydrologic and hydraulic analyses...that the proposed encroachment would not result in any increase in flood levels during the base flood discharge."

19. The County has allocated $400,000 for required downstream mitigation occasioned by the removal of BB2. FEMA's example of mitigation is raising a structure. FEMA states that where it is not possible to mitigate, wet floodproofing may be offered. Can you clarify for me if the County's interpretation of "not possible" is the same as "we did not set aside enough money to pay for mitigation?"