NATIONAL FLOOD INSURANCE PROGRAM
FEMA MT-2 PROVIDER

September 25, 2025

James Reilly, P.E.
Stetson Engineers Inc.
2171 East Francisco Boulevard, Suite K
San Rafael, CA 94901

IN REPLY REFER TO:
Case No.: 25-09-1047R
Communities: Town of Ross and Town of San Anselmo, California
Community No(s).: 060180 and 060179

316-AD

Dear James Reilly:

This is regarding your request received July 30, 2025, that the Department of Homeland Security's Federal Emergency Management Agency (FEMA) issue a conditional revision to the Flood Insurance Rate Map (FIRM) for Town of Ross and Town of San Anselmo, Marin County, California and Incorporated Areas. Pertinent information about the request is listed below.

Identifier:	Proposed Removal of Building Bridge #2 on San Anselmo Creek
Flooding Source(s):	San Anselmo Creek and San Anselmo Creek Overflow
FIRM Panel(s) Affected:	06041C0452E, 06041C0456F, 06041C0454E, 06041C0458F

The data required to complete our review, which must be submitted within 90 days of the date of this letter, are listed on the attached summary.

If we do not receive the required data within 90 days, we will suspend our processing of your request. Any data submitted after 90 days will be treated as an original submittal and will be subject to all submittal/payment procedures, including the flat review and processing fee for requests of this type established by the current fee schedule. The fee schedule is available for your information on the FEMA website at https://www.fema.gov/flood-maps/change-your-flood-zone/status/flood-map-related-fees.

FEMA receives a large volume of requests and cannot maintain inactive requests for an indefinite period of time. Therefore, we are unable to grant extensions for the submission of required data/fee for revision requests. If a requester is informed by letter that additional data are required to complete our review of a request, the data/fee must be submitted within 90 days of the date of the letter. Any fees already paid will be forfeited if the requested data are not received within 90 days.

If you have general questions about your request, FEMA policy, or the National Flood Insurance Program (NFIP), please contact the FEMA Mapping and Insurance eXchange (FMIX), toll free, at 1-877-FEMA MAP (1-877-336-2627). If you have specific questions concerning your request, please contact your case reviewer, Hernan Rodriguez, P.E., CFM, by e-mail at hernan.rodriguez@aecom.com, or by telephone at (301) 944-2570, or the Revisions Coordinator for your state, Naresh Balija, P.E., PMP, CFM, at NBalija@taylorengineering.com or at (240) 316-4356.

Sincerely,

Henry Poburka, P.E., CFM
Zone 3 Revisions Manager
Focus Revision Partners (FOCUS) JV

Attachment:
Summary of Additional Data

cc: Christopher Blunk
Interim Public Works Director
Marin County

Christa Johnson
Town Manager
Town of Ross

Sean Condry
Public Works Director – Floodplain Manager
Town of San Anselmo

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Summary of Additional Data Required to Support a
Conditional Letter of Map Revision (CLOMR)

Case No.:	25-09-1047R	Requester:	James Reilly, P.E.
Community:	Town of Ross and Town of San Anselmo, California	Community No.:	060179 and 060180

The issues listed below must be addressed before we can continue the review of your request.

1. Our review of the online application form revealed that a community official did not sign the form. Please submit a copy of MT-2 Application/Certification Form 1, entitled "Overview and Concurrence Form," where all three of the signature blocks have been signed, including the second signature block, which must be signed by a Town of San Anselmo official (preferably the Floodplain Administrator).

2. Our review revealed that MT-2 Form 3, entitled "Riverine Structures Form," was not filled out to include the new pedestrian bridge that will be in the place of BB2. Please provide an updated copy of Form 3 that has been completed to include this information. The MT-2 instructions and forms are available for your information on the Federal Emergency Management Agency (FEMA) website at https://www.fema.gov/flood-maps/change-your-flood-zone/paper-application-forms/mt-2.

3. Please address the following comments regarding the submitted hydraulic analysis or provide an explanation for each.

    a. Our review revealed that the unencroached (natural) base flood profile in the floodway plan is different from the base flood profile in the multiple profile plan. The unencroached profile for the existing conditions floodway plan should be exactly the same as the base flood profile in the existing conditions multiple profile plan. Please revise the floodway plan so that the natural base flood profiles are the same in both the floodway plan and the multiple profile plan.
    b. Our review revealed a discrepancy between the steady flow data in the proposed conditions floodway model and the effective floodway model. The flow data input for the unencroached base flood profile and the encroached base flood profile do not match the values input in the effective floodway model. Please revise the submitted hydraulic model to ensure consistency with the effective model.
    c. The ineffective flow area option should be used when a section of the floodplain is not actively flowing for reasons such as being separated from the main channel due to structures and areas of rapid expansion and contraction. Please add ineffective flow areas at Cross Sections 23019-23044 along San Anselmo Creek to reflect the presence of the new pedestrian bridge. Please also remove the right ineffective flow area at Cross Section 22927 that was used to model the interactions between San Anselmo Creek and BB2 in the duplicate effective model. Please make these changes to ineffective flow areas or explain why making these adjustments are not necessary.

d. According to the Hydrologic Engineering Center River Analysis System (HEC-RAS) Hydraulic Reference Manual, the typical contraction and expansion loss coefficients are equal to 0.3 and 0.5, respectively, at bridges and culverts where there are more abrupt transitions (as are typical at bridge and culvert Sections 2, 3, and 4) and are equal to 0.1 and 0.3, respectively, at cross sections where there are more gradual transitions (including bridge and culvert Sections 1 and 5). Please revise the submitted proposed conditions hydraulic model so that the contraction and expansion loss coefficients are equal to 0.1 and 0.3, respectively, at Cross Section 22927 along San Anselmo Creek or provide an explanation of why the contraction and expansion loss coefficients used in the model were chosen.
e. Our review revealed that the channel bank stations at Cross Sections 22927-23044 along San Anselmo Creek are located above the base flood elevation (BFE). Channel banks are commonly defined by higher frequency storms and are usually below the BFE but above the bottom of the channel. Please review these cross sections and either revise the channel bank stations to be below the BFE or provide an explanation for why these channel bank stations were chosen.
f. Our review revealed discrepancies in the locations of the encroachment stations along the revised reach of San Anselmo Creek Overflow at Cross Sections 1755-4609 and 4750-5061. Please revise the revised conditions hydraulic model for San Anselmo Creek Overflow so that the encroachment stations are located at the bank stations or in the floodway fringe, the area between the channel bank station and the limits of the base floodplain, for all cross sections.

4. The submitted project plans include information for structures outside the scope of this CLOMR making it very difficult to verify the modeling of hydraulic structures included in the submitted hydraulic model. Please resubmit only the plan sheets that contain information for the structures included in the submitted hydraulic model. The sheets should be certified (sealed, signed, and dated) and should reference the vertical datum, such as the North American Vertical Datum of 1988 (NAVD 88). The plans should also contain all the information necessary to verify the modeling such as the structure dimensions and elevations (low chord, high chord, inverts, etc.). In addition, please label the structures on the plans with the cross section number in the hydraulic model for easy cross-referencing.

5. The submitted certified topographic work map, entitled "Topographic Working Map BB2 CLOMR," prepared by Stetson Engineers Inc., does not provide essential information required to complete our review of this request. Please submit a revised topographic work map, certified by a registered Professional Engineer, which shows all applicable items listed in Section C of Application/Certification Form 2, entitled "Riverine Hydrology and Hydraulics Form," including the following information. Please ensure that there is consistency between the work map, revised hydraulic model, and the annotated Flood Insurance Rate Map (FIRM).

   a. Our review revealed that the 0.2-percent-annual-chance flood profile was calculated but was not delineated on the submitted work map. FEMA Policy Standard SID 133 states, in part, "If it is calculated, the 0.2-percent-annual-chance flood must be delineated." Please provide an updated certified work map, digital work map and annotated FIRM that show the delineation of the 0.2-percent-annual-chance floodplain.
   b. Please **show and label** the topographic contour information used for the boundary delineations of the base floodplain and 0.2-percent-annual-chance floodplain. Please ensure that enough contours are labeled so that the floodplain delineations can be verified.
   c. Our review revealed that several cross sections in the hydraulic model are not shown on the topographic work map. Please **show and label** the locations and alignments of all cross sections

used in the hydraulic model that are within the revised area. Please also ensure that the cross sections are labeled the same way as they are in the model.

d. To assist our review and to expedite processing of this request, please provide digital Computer-Aided Design (CAD) or Geographic Information System (GIS) data that reflect the revised topographic work map. Please ensure the digital data are spatially referenced and cite what projection (coordinate system, example: UTM/State Plane) was used, so that the data may be used for accurate mapping. The important data to show on the digital work map are the contour information, the stream centerline, the cross section lines, the road crossings and hydraulic structures, the effective and proposed flood hazard delineations, and the tie-in locations. Everything should be clearly labeled and all information should be contained within the drawing and not externally referenced.

6. Please address the following comments regarding any map-model discrepancies or provide an explanation for each.

   a. The geometry in the proposed conditions hydraulic model does not match the topography shown on the topographic work map at Cross Sections 21539-21813 and 23358-23556 along the main channel of San Anselmo Creek. Please provide an updated hydraulic model or topographic work map, as appropriate, to ensure consistency between the geometry in the hydraulic model and the topographic contours on the work map. Please ensure that the channel centerline follows the path of lowest elevation along the flooding source.
   b. The top widths of the regulatory floodway, base, and 0.2-percent-annual-chance floodplains computed in the proposed conditions hydraulic model do not match the floodplain top widths shown on the topographic work map at multiple cross sections along San Anselmo Creek and San Anselmo Creek Overflow. Please revise the work map or hydraulic model as appropriate to resolve these discrepancies. Please ensure that the top widths of the regulatory floodway, base, and 0.2-percent-annual-chance floodplains match the output from the submitted hydraulic model within 5 percent of the respective FIRM panel's scale. The geometry of the cross sections in the proposed conditions hydraulic model should reflect the topography shown on the work map.

7. Our review revealed that the property owner notifications submitted were provided by the Marin County Flood Control and Water Conservation District. Due to the community's intent to revise the regulatory floodway, property owner notifications are required to be published and distributed by the affected communities, those being the Town of San Anselmo and the Town of Ross. Please note that the submitted draft property owner notification will be reviewed once we are confident that there will be no further changes to the modeling and/or mapping. Please do not publish or distribute the final notification until we have approved the draft notice. If you choose newspaper notification, please coordinate with the community's Floodplain Administrator to ensure that the notification can be done through newspaper notice because the community's preference may be to deliver the notifications via individual legal notices. Under the National Flood Insurance Program (NFIP), it is the community's responsibility to coordinate and inform their local constituents about the flood hazard changes so the delivery method should be the community's choice.

Please upload the required data using the Online LOMC website at https://hazards.fema.gov/femaportal/onlinelomc/signin.

For identification purposes, please include the case number referenced above on all correspondence.