June 11, 2026

The Association for the Office of Response and Recovery (ORR)
Federal Emergency Management Agency
Washington, D.C. 20472

To Whom It May Concern:

I am writing as the civil engineering consultant assisting the Town of Black Mountain with site evaluation, drainage analysis, and damage assessment for the Public Safety Building following Hurricane Helene. My opinions are based on review of the Facility Condition Assessment including Amendment 01 dated May 22, 2026, subsequent geotechnical borings, prior subsurface investigations, and my involvement in evaluating site conditions.

Based on this information and evaluation, it is my opinion that Hurricane Helene materially exacerbated subsurface groundwater conditions and drainage issues at the site, resulting in structural settlement, distress, and continued structural degradation of the Public Safety Building. The recommended scope of work which consists of groundwater control, stormwater system repair/relocation, soil stabilization, and structural repair is necessary to address existing issues and restore the facility to a safe and functional condition.

It is acknowledged that prior reports identified underlying geotechnical vulnerabilities. However, from an engineering standpoint the presence of soft soils alone does not constitute structural failure, and the pre-storm structure was performing at an acceptable level. Quickly following Helene, the observed level of settlement, cracking, and instability reflects a change in condition, not merely the existence of prior deficiencies. Hurricane Helene acted as a triggering and accelerating event, increasing groundwater saturation and forcing instability in the subsurface soils.

Based on the available engineering data and professional evaluation Hurricane Helene contributed to and exacerbated site and subsurface conditions, resulting in structural degradation. The current facility condition reflects an active and ongoing failure mechanism. The recommended scope of work is necessary, reasonable, and technically justified to address the existing structural issues. Stabilization, drainage corrections, and subsurface remediation are required aspects of this structural repair.

For these reasons, I respectfully support the Town of Black Mountain's Second Appeal and request FEMA's reconsideration of eligibility of this facility for reimbursement.

Sincerely,
McGILL ASSOCIATES, PA

BEN CATHEY, PE
Practice Area Leader

