



STAFF REPORT

Meeting Date: June 24, 2014

To: Honorable Mayor & City Council

From: Susan Healy Keene, AICP, Director of Community Development
Raj Patel, P.E., City Building Official, Assistant Director of
Community Development

Subject: Fault Rupture Investigation for 9900 Wilshire Blvd

Attachments:

1. Dr. Shlemon Letter of Recommended Acceptance
2. City Letter of Acceptance to Developer
3. Correspondence Submitted by BHUSD on June 17, 2014
4. Report of Phase 2 - Site specific Fault rupture investigation (on attached CD)

INTRODUCTION

This report provides information regarding the Fault Rupture Investigation performed for proposed development at 9900 Wilshire Boulevard.

BACKGROUND

The subject project entitlement at 9900 Wilshire Boulevard was approved in December 2008. The project is a mixed use project that includes two residential buildings with 235 condominium units and approximately 16,500 square feet of commercial space. In preparation for demolition of existing structures, the city required the developer to retain a licensed geologist to conduct a fault rupture investigation to be submitted to the City for review and approval.

The developer hired Geocon to perform the Fault Rupture investigation for 9900 Wilshire. The primary Consultants-of-Record from Geocon responsible for the investigation were Susan Kirkgard (Certified Engineering Geologist License Number 1754) and Gerald Kasman (Certified Engineering Geologist License Number 2251). In accordance with guidelines published by the California Geologic Survey, the City hired an experienced licensed geologist, Dr. Roy Shlemon (Certified Engineering Geologist License Number 2867), to peer review Geocon's Fault Rupture Investigation. During the initial part of the process and prior to field investigation, Dr. Shlemon verified that Geocon's proposed field study methodology was consistent with industry best practices. During the field investigation, Dr. Shlemon visited the site and reviewed Geocon's methods and findings. In mid-May 2014, Dr. Shlemon provided a letter to the City recommending acceptance of Geocon's Fault Rupture Investigation (see Attachment 1). On May 19, 2014, the City sent a letter to the developer's representative indicating acceptance of Geocon's Fault Rupture Investigation (see Attachment 2) and Beverly Hills Unified School District (BHUSD) was notified shortly after.

DISCUSSION

The developer began the Fault Rupture Investigation the week of October 14, 2013. City staff immediately notified the BHUSD who expressed interest in the results. Beginning in January 2014 requests were made by BHUSD for copies of the investigation report. The City responded that the investigation report would be made available to BHUSD once the City received and accepted the document. The City accepted the report on May 19, 2014. Subsequently, on May 22, BHUSD representative Tim Buresh formally requested that the City allow independent confirmation of the data and analysis by geologists retained by the BHUSD. This request included access to observe the core samples used in the investigation (see Attachment 3, Exhibit H). A hard copy of the investigation report was sent to Tim Buresh, on May 29, 2014. On June 2, 2014, on behalf of the BHUSD, the City contacted the developer, Geocon and Dr. Shlemon to determine if the core samples were available for review. Both Geocon and Dr. Shlemon stated that they did not have the core samples. The core samples are the property of the developer. The developer's representative responded on June 3 that all core samples related to the investigation were disposed of along with other demolition debris. The California Geological Survey has confirmed there is no requirement or industry standard for the core samples to be retained once the Fault Rupture Investigation has been accepted.

Core samples are borings of soil taken from selected areas that are analyzed to determine the age of the soil and where indicated, when the last seismic activity may have occurred. The Policies and Criteria of the State Mining and Geology Board with reference to the Alquist-Priolo Earthquake Fault Zoning Act define an active fault as one which has had surface displacement within the Holocene time (about the last 11,500 years). The core samples used in this study were photographed and representative photographs of the method of collection, storage, and actual samples are included in the Investigation. Dr. Shlemon also has photographs of the core samples.

During the public comment portion of the June 17, 2014 City Council meeting, speakers, including members of the BHUSD Board, expressed concern regarding the investigation report and specifically the lack of availability of the core samples used in the study.

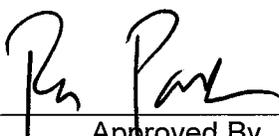
The city's peer reviewer, Dr. Roy Shlemon, will be available to answer any questions at the meeting.

RECOMMENDATION

Staff recommends that City Council receive the information provided and direct staff as appropriate.



Approved By
Susan Healy Keene, AICP



Approved By
Raj Patel, P.E.

ATTACHMENT 1

ROY J. SHLEMON & ASSOCIATES, INC.
Geologic and Environmental Consultants

P.O. Box 3066
Newport Beach, CA 92659-0620

Tel: 949-675-2696
E-mail: rshlemon@jps.net

Quaternary Geology
Economic Geomorphology
Soil Stratigraphy
Geoarchaeology
PG 2867; CPG 1766; CPESC 2167

RECOMMENDATION FOR ACCEPTANCE

**INVESTIGATIONS FOR POTENTIAL SURFACE FAULT RUPTURE
9900 Wilshire Boulevard, City of Beverly Hills, California**

This document summarizes a peer review of a "Fault Rupture Investigation" for a proposed development at 9900 Wilshire Boulevard in the City of Beverly Hills, California. The City requires the peer review in conformance with building codes and to ensure public health, safety and welfare.

The investigations were carried out by Geocon West, Inc. (Geocon; Consultants of Record) on behalf of Allen Matkins Leck Gamble Malory and Natsis, LLP (Los Angeles), a legal firm representing the Applicant. The main purpose of the Geocon investigation was to determine if previously inferred faults projected into the site are "active" according to current State of California definition (surface or near-surface ground rupture within the last 11,500 years). Geocon (2013) previously submitted a comprehensive literature review ("Phase I investigation") of the regional geological framework and the neotectonic setting. The Consultants have now completed "Phase II" of their investigations, mainly site-specific subsurface exploration that conforms to the required standard-of-practice for assessing potential surface fault rupture; mainly, excavating and geologically documenting (logging) trench exposures, advancing cone penetrometer tests (CPT), and drilling and interpreting continuous-core samples within and immediately adjacent to the 9900 Wilshire site.

The Geocon, Phase II report now provides appropriate geologic maps, trench logs, cross sections, boring logs, soil-stratigraphic profiles, groundwater elevations and other data applicable to assess potential fault presence and activity. Accordingly, the fundamental conclusions of the Consultants-of-Record are:

1. That Geocon has now completed the necessary on-site investigations thus conforming to current standards-of-practice for fault-activity assessments in southern California;

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2. That previous investigations near the 9900 Wilshire site indicated possible NW-trending splays of the active Newport-Inglewood fault zone and generally E-W and NE trending splays of the Santa Monica fault zone potentially impacted the central and northwest corner of the proposed development.
3. That Geocon now addresses potential on-site faulting by emplacing and logging 3, 20+ ft deep trenches, along the south, east and west sides of the property, respectively; by interpreting two NE-SW seismic lines across the property (within the existing parking structure); and by assessing the potential for on-site impact of Santa Monica fault zone splays in the northwest part of the site and elsewhere by interpreting geologic and soil-stratigraphic continuity as recorded in continuous cores and in CPT transects;
4. That, as exposed in the site trenches, datable sediments were identified as to their continuity and age, based mainly on relative development of soil (pedogenic) profiles, particularly remnant argillic horizons (Appendix E).
5. That trench and core-exposed sediments generally exceed 20,000 to 30,000 in age, and therefore are of sufficient antiquity to confidently assess potential offset of Holocene (11,500 yr) sediments;
6. That last displacement of previously postulated, NW-trending splays of the Newport-Inglewood fault, if present, took place more than 11,500 years ago, and hence deemed "not active" according to State of California definition.
7. That previously inferred NE-trending splays of the Santa Monica fault zone through the central part of the site similarly do not break pre-Holocene sediments as exposed in site trenches and as interpreted in site seismic lines;
8. That several splays of the Santa Monica Fault Zone (West Beverly Hills Lineament[s]), designated by Geocon as faults "F through J," are identified offsite, immediately adjacent to the north and west boundary of the property; and that faults G, H, and I, respectively, cut Holocene age sediments as deduced from interpretation of cores and CPT lines in this area and therefore are "active."
9. That Fault J, projecting across the northwest corner of the site, is pre-Holocene in age and therefore does not warrant mitigation for surface fault rupture.

Peer Review

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10. That, nevertheless, owing to uncertainties in fault dip and projection between cores and CPT lines, Geocon reasonably recommends establishment of a 50-ft wide structural setback (for habitable structures) parallel to the NW corner of the site;

Accordingly, the Consultants of Record have now completed a standard-of-practice investigation to assess potential active faulting at the 9900 Wilshire site in the City of Beverly Hills.

Therefore, based substantially in and on reliance of the technical documentation and assurances provided by the Consultants-of-Record, including their opinions and conclusions, and on our present understanding as to the possible presence and relative impact of active faults within and adjacent to the proposed development, we conclude that the combined Phase I and Phase II Geocon investigations now meet the current geologic standard-of-practice for evaluating the site-specific potential for surface fault rupture. Accordingly, the combined reports, and their fundamental conclusions, thus warrant acceptance by the City of Beverly Hills.

Please note that the Geocon reports focus solely on potential surface or near-surface fault rupture; and that they specifically do not address potential high seismic accelerations, ground deformation or other structural design and geotechnical requirements required by applicable building codes or by present professional engineering and geological standards of practice. It is therefore incumbent upon Geocon, or other consultants, to provide this information to the City of Beverly Hills for review and potential acceptance prior to issuance of building permits.

Recommended for Acceptance



Roy J. Shlemon, Ph.D.
Peer Reviewer

May 2014

ATTACHMENT 2



David Yelton, Acting Building Official
Community Development Department

May 19, 2014

Allen Matkins Leck Gamble Malory & Natsis LLP
Attention: Patrick A. Perry
515 South Figueroa Street, 9th Floor
Los Angeles, CA 90071

Subject: Acceptance of Peer-Review Recommendation: "Investigations for Potential Surface Fault Rupture:" 9900 Wilshire Boulevard, City of Beverly Hills, California.

Dear Mr. Perry:

The "Fault Rupture Investigation" (Investigation) for the proposed development at 9900 Wilshire Boulevard, in the City of Beverly Hills, California as prepared by your Consultants-of-Record, Geocon West, Inc. (Geocon) has been peer reviewed by the City's consultant, Roy J. Shlemon & Associates, Inc. (RSA). The peer review included critique of the "Phase I Investigation" (comprehensive literature review titled "Fault Rupture Hazard Evaluation, Project No. A9009-06-01, dated April 22, 2013), and the "Phase II Site-Specific Fault Rupture Investigation" (Project No. A9009-06-01A dated May 6, 2014). The geologic investigation and peer review are required by the City in conformance with the current building codes and with current geologic-standards-of practice that ensure public health, safety and welfare.

Accordingly, in reliance on the technical documentation and assurances provided by the Consultants-of-Record, including their opinions and conclusions, the City of Beverly Hills now formally accepts the Technical Recommendations of the Reviewer (attached).

Sincerely,

A handwritten signature in black ink that reads "D. Yelton".

Attachment: Roy J. Shlemon & Associates, Inc. "Recommendation For Acceptance," May 2014

ATTACHMENT 3



**Beverly Hills
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255 S. Lasky Drive, Beverly Hills CA 90212 (310) 551-5100

June 17, 2014

HAND DELIVERED

Mayor Lili Bosse

Honorable Members of the City Council

City of Beverly Hills

455 North Rexford Drive

Beverly Hills, California 90210

Re: 9900 Wilshire Project

Dear Mayor Bosse and Honorable City Council Members:

I am writing on behalf of the Beverly Hills Unified School District ("District"). On May 19, 2014, the City of Beverly Hills ("City") accepted a "Fault Rupture Investigation" ("investigation") for the proposed development at 9900 Wilshire Boulevard in the City of Beverly Hills ("Project"). The investigation concludes that potentially active earthquake faults intersect El Rodeo School and that those faults continue in a northeasterly direction through the City. The City, in its approval of this report, has cast the shadow of the Santa Monica Fault across much of the City. The consequences are far-reaching and must be understood by this Council.

The investigation differs significantly from the conclusions of the District's extensive seismic investigations, which were put in motion by the MTA's first round of questionable science used to justify moving the Westside Extension Station. The detailed and extensive investigation the District was required to complete concludes that the faults are inactive. As explained in greater detail below, District Staff and consultants repeatedly asked both the developer of the Project and City Staff to engage in a cooperative effort and share data and information prior to the formal acceptance of the investigation. That cooperation, while required by the Development Agreement for the Project, and which we would expect as a courtesy from the City, was never forthcoming. The District repeatedly requested updates on the investigation and access to or even just information about the underlying data and core samples. As explained to your Staff, the information was to be provided to the geologists working on behalf of the District so that the District could independently confirm and analyze the conclusions contained in the investigation. After months of inquiry, and stalling by the developer and your Staff, we learned from City Staff on May 29, 2014 that the core samples had inexplicably been destroyed and were therefore not available for independent review. The destruction of these core samples is contrary to established industry standards and the cooperation the City promised the District. The net result of the above is that City Staff accepted an unverifiable report concluding there are no active faults underneath the Project site, but that there are active faults under the El Rodeo campus and the northern half of the City. The evidence relied upon to support both conclusions has been destroyed contrary to ordinary practice.

As a result, and in the interests of public safety, the District has to expend substantial funds to replace the destroyed borings and trench the El Rodeo campus - - all for the purpose of now having to demonstrate that the faults are inactive and the school is safe for occupancy. We estimate the District

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will incur well in excess of \$250,000 to perform this work, i.e., work that has been necessitated by City Staff's acceptance of the investigation and the developer's destruction of the underlying core samples. This is money that would and should have been spent on other pressing school matters.

By way of background, beginning in October 2013, District consultant, Tim Buresh, requested that the developer of the Project exchange seismic information. (See email from Tim Buresh to the developer's consultant, Susan Kirkgard, dated October 25, 2013, attached as Exhibit A.) Thereafter, Mr. Buresh met with City Staff in November for an extensive discussion of seismic risks and solutions within the City. (Mr. Buresh's written presentation is attached as Exhibit B.) During the course of this discussion, the Project was discussed in detail, the perils to the City of an inadequate study, and the science behind the District's belief that any faults within the immediate vicinity of the Project and the El Rodeo campus were inactive. Thereafter, at the end of December, Mr. Buresh again requested the City, the City's outside consultant and the developer release information regarding the ongoing seismic investigation associated with the Project. (See emails of December 30, 2013 attached as Exhibit C.) In January, and after having heard nothing further from City Staff or the developer, the District again requested an opportunity to review the investigation being prepared for the Project. Despite repeated requests to the developer and the City, the developer refused to share the draft seismic report that had been prepared. (See, e.g., January 27, 2014 email from the developer's consultant, Susan Kirkgard, to the District's geologist, Miles Kinney, attached as Exhibit D.) Thereafter, in February, the District, through its counsel, contacted the developer's attorney and requested that, at a minimum, the District be afforded an opportunity to review the underlying objective raw data, including core samples, that were relied upon in preparing the investigation. (See email from Doug Evertz to Allan Alexander dated February 7, 2014, attached as Exhibit E.)

In late February of 2014, the developer, through its attorney, released limited materials to the District. That information was insufficient to draw any conclusions. The District again requested to see the raw data - - and again offered to make available to the developer information the District obtained from its own geologists. The District was once again rebuffed and no information on the investigation was provided.

In March, you will recall the City agendaized an item to consider the retention of a firm for construction oversight services for the Project. The Staff Report prepared in connection with this agenda item erroneously stated that the City and District had "jointly selected" the firm proposed by City Staff to provide construction oversight services. On March 10, 2014, the District advised the City Council of the errors contained in the Staff Report. In its correspondence, the District again requested the City foster a spirit of cooperation by sharing seismic data and information. (See attached Exhibit F.) In response, City Manager Kolin apologized to the District for the errors contained in the Staff Report and committed to share information and work cooperatively with the District. (See Mr. Kolin's correspondence dated March 25, 2014, attached as Exhibit G.)

On May 22, 2014, and having received no update or further information regarding the status of the investigation, the District contacted the City and again requested that prior to finalization of the investigation, the District be provided the opportunity to review and confirm the findings contained therein. (See email from Tim Buresh to City Staff dated May 22, 2014, attached as Exhibit H.) During this period of time, Mr. Buresh was in contact with Mr. Wiener, the City's attorney, again requesting access to the core samples. Mr. Wiener stated that he was working with City Staff to



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arrange the review of the core samples. (See May 28, 2014 email from Mr. Wiener to Tim Buresh, attached as Exhibit I.)

On May 29, 2014, the District was advised for the first time that Mr. Yelton, acting on behalf of the City, had formally accepted the investigation ten days earlier on May 19, 2014. Mr. Yelton's May 19, 2014 "Acceptance of Peer-Review Recommendation" includes an attachment from an outside consultant which references the existence of "active" faults "immediately adjacent to the north and west boundary of the property," i.e., immediately directed at El Rodeo School and beyond. (See attached Exhibits J and K.) On May 29, 2014, Mr. Wiener advised the District for the first time, through a message from Mr. Yelton, that the objective core samples, upon which the investigation was based, upon which the City's approval of the Project was based, and contrary to standards of practice in the industry, had been destroyed by the developer during demolition. (See May 29, 2014 email from Larry Wiener to Mr. Buresh, attached as Exhibit L.) This is inexplicable, as the District had been advised demolition would not begin until June 2, 2014, and the District's desire to look at the samples was clear to the City, and Staff had represented they were working to get the District access to the cores – even after they were destroyed.

On May 30, 2014, City Manager Kolin then sent a preemptive email to Superintendent Gary Woods. (See e-mail, attached as Exhibit M.) Mr. Kolin confirmed that the investigation had formally been accepted by the City and that the core samples had been destroyed.

Attached for your information as Exhibit N are figures from the investigation which claim to show the existence of "active" faults. While none of these faults are located on the Project, they are inferred as crossing the El Rodeo campus and presumably continuing northeast through the City. The District is at a loss as to why the preparer of the investigation and/or the developer of the Project felt compelled to wrongly identify faults off of its property, to classify those faults as "active," and to publish a report with those unsubstantiated conclusions. Most disturbing however, is why, under all of these circumstances, City Staff felt compelled to rush to judgment and approve this Project with all of the negative consequences for our schools, our District and our community. Through its Staff, the City has now officially accepted an investigation that does not impact development of the Project, but includes a map of "active" faults located off the Project and pointed directly at the El Rodeo campus and neighborhoods beyond. The District's geologists believe this is a gross overstatement of the data in their possession and that the conclusions in the investigation are suspect and erroneous. The destruction of core samples – the only direct evidence available - after concluding there are active faults on a third party's property is beyond questionable and suspicious in the extreme.

Unfortunately now that the data and core samples relied upon to support the conclusions in the investigation have been destroyed, and in order to alleviate any public and/or regulatory agency concerns, the District retained a qualified firm to perform replacement core borings and necessary trenching of the El Rodeo site to refute the erroneous and irresponsible report adopted by the City. The District's work will be performed under the regulatory authority of the California Geological Survey ("CGS"). CGS takes an extremely conservative approach in approving seismic investigations of schools – as it should when the safety of children is involved. That work has commenced as rapidly as possible, as the District cannot proceed with planned renovations of El Rodeo School until CGS is satisfied the site is safe and the investigation is wrong.



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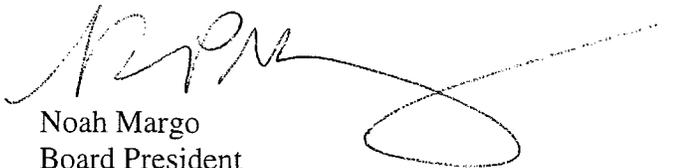
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Costs associated with the ongoing trenching work at El Rodeo are rapidly increasing. For example, we have just learned that the playfield artificial turf covering will be essentially destroyed by the trenching at El Rodeo. This is a playfield that is used every day of the week by students and community recreation. Remarkably, a Staff Report for today's study session states that the City would like more access to the El Rodeo playground. Ironically, in accepting the investigation, it is Staff that jeopardized the playground.

The City entered into its agreement for the development of the Project with a promise to protect the District and its community. The City, through its Staff, has failed to do so. The inattentiveness of City Staff has now forced the District into a complicated, uncertain and expensive seismic investigation. And it was all avoidable. Had Staff simply done what it has said it would do – over and over – what was promised in the Development Agreement, we would not be at this point right now, because Staff failed to do what it should have done – what it promised to do, what the Council promised it would do – the District must now pay the price. This cost could have been avoided, and the District requests the City reimburse these expenses in full to the District.

The District and the City share many common interests. Our School Board and the City Council have, and will continue to, enjoy a positive and constructive working relationship. It is our continued desire to jointly pursue common goals for our residents. We do, however, need to establish clear lines of communication between District Staff and City Staff so that what transpired in connection with the Project does not occur again.

Sincerely,



Noah Margo
Board President

EXHIBIT A

Exchange of data

Timothy Buresh <tim.buresh@primesourcepm.com>

Fri, Oct 25, 2013 at 2:56 PM

To: "Susan F. Kirkgard CEG" <skirkgard@geodesigninc.com>, Miles Kenney <miles.kenney@yahoo.com>

Susan and Miles,

We are all advocates of an open exchange of information in order to better understand the geology that our clients are faced with. BHUSD has already taken supportive positions regarding redevelopment of the 9900 site. BHUSD has also formed a technical assessment of the 9900 site: we believe that any faults on that site are most likely deep, old and inactive. We would be delighted if your investigation confirmed this.

Our conclusions are based on extensive analysis that we are compiling into a comprehensive report dealing with the structural geology of the greater Century City area. We have prepared several transects of potential value to your investigation: Transect 7 which runs N-S from El Rodeo Elementary School to BHHS approximately along the western border of 9900 and which is intended to capture any easterly trending Santa Monica Fault strands; Transect 2/2E which runs along Santa Monica Boulevard and Transect 4 which runs along Durant which together have explored the potential for WBHL faulting.

I understand that your client on 9900 has been reluctant to exchange information from your ongoing investigation. We are prepared to unilaterally share our information in the hope that your client will reconsider his position. By this email, Dr. Kenney is directed to send you electronic copies of the three transects described above for your use and consideration.

We are attempting to complete and release our report by the end of November, so your investigation is timely. Any additional information you can provide to augment the information contained within these transects would be greatly appreciated.

BHUSD remains interested in an additional exchange of information. For example, it appears that the boring data we have obtained along the southern edge of El Rodeo would eliminate the need for your client to do expensive CPT borings along Wilshire Boulevard. I hope that your client may appreciate that a further open exchange of information is in his financial bet interest.

Good luck with your investigation.

—
PrimeSource PM, LLC

Tim Buresh

5 Single Tree Lane

Rolling Hills Estates, CA 90274

424/903-9412 Cell

424/206-9633 Office

tim.buresh@primesourcepm.com

EXHIBIT B

The City of Beverly Hills Seismic Problem... and a Proposed Solution

Introduction

The City of Beverly Hills faces distinct, but poorly understood and appreciated seismic risks. It is commonly acknowledged that multiple faults are in or near Beverly Hills. Although the California Geological Survey has not officially zoned any Alquist-Priolo faults in the City of Beverly Hills, scientific studies by the United States Geological Survey, by numerous published researchers, and by the California Geological Survey itself provide strong evidence that numerous potentially active faults occur in the City of Beverly Hills.

The current City regulatory response to this seismic risk is very limited. There are no City-defined seismic hazard zones, even though there is consensus on general locations and risks sufficient to develop localized seismic hazard mapping. The structural seismic loading factors contained in the City building codes do not reflect characteristics unique to Beverly Hills. There are no restrictions on development based on the presence of seismic faults. The City does not even require seismic fault investigations. Instead, the City has placed most of the seismic decision-making burden on individual property owners with little regulatory guidance or oversight.

The current approach may not be in conformance with the intent of the Alquist-Priolo and State Seismic Hazards Mapping Acts, or the intent of FEMA hazards recognition and mitigation regulations or good municipal planning and regulation as demonstrated by sister cities in the region.

The release of a detailed structural geology report on the greater Century City area is imminent. That report has generated a lot of information on the probably fault structure in Beverly Hills. Release of that information will garner a substantial amount of public interest and will underscore the disconnect between City policy and the emerging realities of seismic understanding in the area. The current City approach may affect the ongoing Metro litigation by creating the impression that the City is "weak" in its own seismic regulation or understanding, versus Metro who is "aggressively" protecting the public safety. The current position has the potential of creating negative press similar to the L.A. Times Millennium project series of articles. Those articles have severely criticized the City of Los Angeles for not doing enough to ensure the seismic safety of development; the City of Beverly Hills is doing substantially less than the City of Los Angeles in this regard.

A more assertive municipal approach is encouraged. Neighboring cities facing similar risks have developed a multi-faceted seismic regulatory approach. Based on their experience, the following steps are recommended:

1. Establish municipal seismic hazard zone mapping based on best current knowledge. Mapping is intended to evolve as new information is obtained.
2. Restrict or condition development within seismic hazard zones unless safety can be demonstrated by specific site investigations and project design. Investigation and review shall follow CGS Alquist-Priolo standards for thoroughness and quality.
3. Establish a public repository of specific site investigations to allow the accumulation and exchange of specific site investigations. Taken together, a comprehensive picture of the subsurface will emerge.
4. Support area-wide seismic investigation and analysis.

The Current General Plan Seismic Policy

The City of Beverly Hills General Plan presents a seismically daunting picture facing the City:

“Geologic and Seismic Hazards

There are several active faults in or near the City of Beverly Hills, including the Hollywood and Santa Monica faults, which converge within the City, and the Newport-Inglewood Fault, located approximately 2 miles south of the City. Figure 1 identifies the regional faults affecting Beverly Hills. Figure 2 identifies areas within the City subject to seismic hazards. The City’s proximity to active seismic faults makes it highly susceptible to geologic and seismic hazards, including expansive soils, subsidence, liquefaction, and landslides.” General Plan – Safety Element – page 177

The General Plan briefly discusses the risk caused by nearby large active fault systems (like the San Andreas Fault Zone). These faults create damage primarily through the energy released in a major earthquake that is translated into horizontal shaking locally. The City is close to several major earthquakes that are active and which create a significant risk of seismic damage that should be controlled to the extent possible by the City.

However, the General Plan is silent regarding the seismic risk posed by potentially active faults that are within the City.

The General Plan identifies steps being taken by the City to deal with seismic risk (e.g. mapping of potential liquefaction and landslide zones, building to modern building codes, retrofitting older structures). However, the plan ignores the most fundamental steps of restricting development over and immediately adjacent to faults, adjusting local building codes to reflect specific local seismic energy patterns.

The Alquist-Priolo Act Requirements

The Alquist-Priolo Act of 1972 makes the California Geological Survey responsible for the State-wide mapping of active faults. There are no Alquist-Priolo mapped active faults inside the City of Beverly Hills. However, that fact may give a false sense of security for several reasons.

The Alquist-Priolo definition of "active" is technically limited. Only faults that have breached the surface within the last 12,000 years are considered "active" by the State. Most geologists have a much broader approach in evaluating seismic activity and risk. For example, the fault that spawned the Northridge earthquake was well known and on several geological maps but did not meet the Alquist-Priolo definition of "active" and was therefore not on the official active fault map.

The State Alquist-Priolo process of finding faults, characterizing their activity level and then placing them on the restricted building maps is very slow. For example, the Santa Monica and Hollywood Faults are larger faults that are undoubtedly active and have been loosely mapped for decades but have yet to be officially added to the State Alquist-Priolo active fault map.

The State Alquist-Priolo mapping process has focused on the largest and most dangerous faults to the exclusion of more localized threats. However, local faults of the type found within Beverly Hills pose a unique level of risk to the community. Because there is little separation between the community and a local earthquake epicenter, the energy from earthquakes on these faults can be much more intense and concentrated than the energy from a larger earthquake further away. Some of the local faults present the added risk of large vertical movements (e.g. the San Vicente fault), which would result in an entirely different structural loading and engineering challenge. Local faults may concentrate the energy released by earthquakes far away, resulting in unexpected damage patterns. If local faults are interconnected (as argued by Metro in the Century City Fault Investigation) then their potential energy and severity are increased and they pose a greater risk to the community.

The State Alquist-Priolo Act prohibits development over active faults and makes local building authorities responsible for its enforcement. The City appears to have taken the position that since there are no active faults on the official State map within the city limits the City is under no legal requirement to restrict development. Unfortunately, the local faults do not care if they are officially mapped or not.

The Importance of Municipal Fault Mapping

The long lag time in State Alquist-Priolo active fault mapping has left municipalities in a quandary: how best to steer local development without accurate State fault mapping, especially in areas where active faults are suspected? Increasingly, local jurisdictions have

taken matters into their own hands and adopted a local seismic hazard zone mapping program accompanied by a regulatory process that restricts development in the mapped hazard zones unless proven safe by specific site fault investigations. Fault investigations and review are required to meet the stringent California geological Survey guidelines.

There are many reasons for creating locally controlled fault mapping and geologic models:

- When threats remain ambiguous or undefined (i.e. no local mapping), they lead to an air of inevitability and inability to avoid damage. A common statement is that nothing can be done because faults are everywhere below us in Southern California. That urban myth is simply not true. When accurate mapping occurs, it not only defines where faults are located, it also defines where faults are absent.
- When threats remain ambiguous or undefined, they tend to get blurred together. An urban myth contends that if a building has been standing for a long time, it has survived many earthquakes and should be deemed safe enough for the next earthquake. Accurate mapping and modeling can differentiate between the various earthquake risks so that people can see that earthquake threats are unequal and accurately assess the safety of their properties based on the faults in their locale.
- It is common sense to restrict construction or development directly over faults that are likely to break the surface. It is also common sense to require special engineering before building over faults that are not likely to break the surface. Accurate mapping allows Cities to pursue independent measures to evaluate these faults within their jurisdiction and prevent inappropriate development prior to the development of official AP restrictions.
- A key step in building code planning is to develop specific predictions of local seismic energy and ground motion. For example, the impact of a San Andreas earthquake would be horizontal shaking, while the impact of a San Vicente earthquake would include substantial vertical movement. Very different structural challenges result. It is impossible to make this kind of assessment without adequate mapping.
- When two faults are nearby, the overall area risk level varies significantly depending on their interconnectedness. The relative level of risk and potential energy of a combined Santa Monica-Hollywood fault zone, or Santa Monica-North Salt Lake Fault Zone is substantially greater than that of individual fault segments. It is difficult to establish proper energy levels and building factors without this understanding. The problem is particularly acute in Beverly Hills where multiple major faults are located but their lateral continuity is very poorly understood.
- It is well understood that the alluvium basins that underlie greater Los Angeles can channel energy from earthquakes that occur at some distance. Less well understood is a phenomenon where the wave energy from regional earthquakes becomes

“channeled” along local fault zones resulting in increased ground shaking where the faults project near the surface. This is one of reasons that severe damage from the Northridge earthquake appeared unevenly distributed over large areas far from the epicenter – including in Beverly Hills.

The main argument against municipal seismic mapping revolves around negative consequences for property values as seismic hazard areas are established. There will undoubtedly be disparate impacts across the community resulting from the mapping and building restriction process.

Note that the vast majority of property in Beverly Hills is not located on or very near a fault; property values tend to increase with the loss of seismic uncertainty created by mapping.

What happens when a property is located in a mapped seismic hazard zone? Note that seismic zones indicate the potential presence of faults and that definitive seismic fault investigations are required to pin down the exact location of fault strands. The experience of surrounding communities that have mapped potential seismic hazard zones is that when detailed fault investigations are completed, the majority of properties located within the zones will either be entirely without faults or will remain partially usable and retain economic value.

The Experience of Similar Cities

The Cities of West Hollywood and Santa Monica share many of the seismic threats faced by Beverly Hills. Both cities are faced with known and presumed dangerous faults that have not yet been added to the State Alquist-Priolo earthquake hazards map. Both have developed similar approaches to dealing with the seismic risk without waiting for the State mapping effort to catch up.

Santa Monica is most concerned with the Santa Monica Fault Zone, while West Hollywood is primarily concerned with the Hollywood fault. The faults share certain characteristics: they are presumed active, the faults consist of multiple fault strands loosely running in parallel, there are wide zones of potential faulting, fault strands are not continuous, there are significant gaps in the fault zones without faulting, and the precise fault location of strands at the surface has not been completely mapped.

Both cities have adopted seismic hazard zone maps that indicate the best known location of local faults. All development within the seismic hazard zones requires specific seismic fault investigation and review in a process that directly references the California Geological Survey Alquist-Priolo guidelines.

Figure 1: Fault Hazard Zone map from the City of West Hollywood General Plan Safety Element. The dashed red lines represent the most current understanding of the various fault strand locations. The red boxes and numbers represent specific fault investigations. Note that many of the investigations have confirmed the absence of faulting on the specific project site and that a handful of investigations have uncovered fault strands off of the main predicted fault strand.



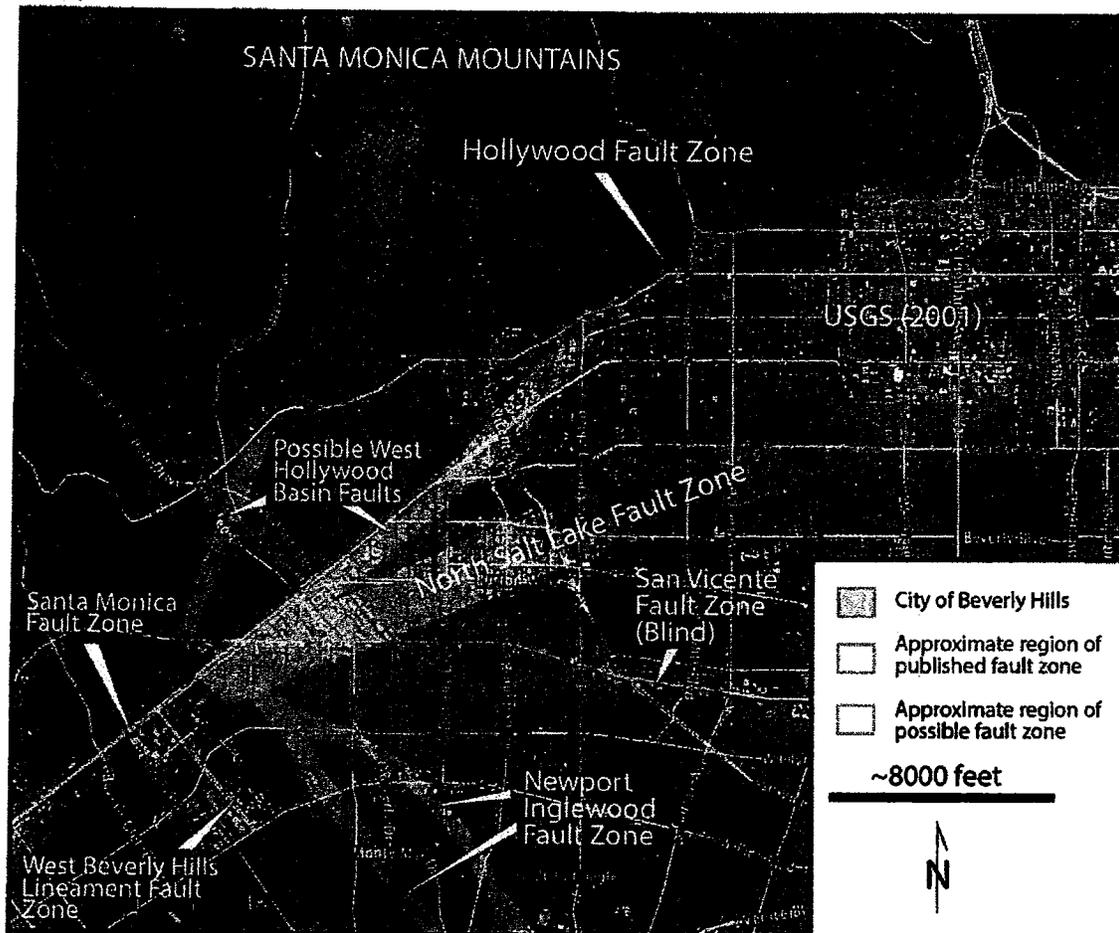
Both cities track and assemble the results of individual site investigations that are incrementally adding to the composite image of the area's fault structure. Their experiences reflect the differences in the seismic challenge faced. The Santa Monica Fault hazard zone is defined by two widely separated specific fault strands. Within the fault hazard zone, smaller fault strands are being found, but the vast majority of seismic fault investigations have actually cleared sites. The Hollywood Fault was long believed to extend across the entire City of West Hollywood and into Beverly Hills. Numerous studies in the eastern half of the City have confirmed the presence and location of multiple fault strands about where expected. The surprise has been the lack of similar discoveries in the western half of the City. Eventually, the respective seismic hazard maps will require readjustment to reflect the accumulating knowledge.

Where are the faults in Beverly Hills?

The ongoing research at BHUSD will shortly deliver a comprehensive report of the structural geology in the greater Century City area. That work has generated a substantial amount of data regarding the probable fault structure in Beverly Hills. A very preliminary local fault hazard map

(Figure 2) has been prepared based on evaluation of data from numerous sources (e.g. borings, cross sections, publications, geomorphic, groundwater barriers, and ongoing BHUSD research).

Figure 1: Generalized fault hazard map of the City of Beverly Hills region showing the approximate regions of known fault zones (published; orange zones) and some speculated faults that have not been confirmed (yellow zones).



Unfortunately, there remains a significant “data gap” in the Beverly Hills area. Beverly Hills is located at the far western end of the Hollywood Fault Zone, at the far eastern end of the Santa Monica Fault Zone, at the northern end of the Newport-Inglewood Fault Zone, and at the western ends of the Salt Lake Fault and San Vicente Thrust Fault. Consequently, the portion of these faults that lie within the city limits has received far less field work than other locations along these fault zones.

The level of certainty for the various fault zones shown on Figure 2 varies greatly. Fault zones shown in orange are taken from published studies and faults are likely to occur in these regions; however, their exact location and activity level of their various strands remains unknown in

many places. The fault zones shown in yellow are postulated based on evaluation of geomorphology, groundwater barriers, and subsurface stratigraphic data. These include possible strands of the Newport-Inglewood Fault Zone, the westward extension of the North Salt Lake Fault, and possible faults connecting the North Salt Lake Fault to the Hollywood fault.

Additional data is needed to make the mapping accurate.

A Proposed Approach for the City of Beverly Hills

The City of West Hollywood Fault Protection Zone concept is appealing. The State of California Alquist-Priolo Act of 1972 clearly states that the Act provides minimum guidelines for fault surface rupture mitigation but that local jurisdictions have the power to create their own fault surface rupture criteria that is equal or beyond that provided within the Act.

There is no comprehensive and detailed fault map for the City of Beverly Hills. Unfortunately, the seismic structure in Beverly Hills is an order of magnitude more complicated and more poorly understood than the situation in West Hollywood or Santa Monica. In addition, some faults identified within the City of Beverly Hills are blind (i.e. San Vicente) which is not believed to be capable of surface rupture but should be considered for ground shaking estimates. Figure 1 presents a good starting point for local mapping. Note that the lack of local data makes much of the initial mapping speculative and uncertain. Additional data will be required to make the mapping more accurate.

The City can be an active partner in this process. A relatively small amount of geological seismic investigation would generate a substantial amount of clarity. For example, running several deep seismograph lines at key locations would substantially clarify the underlying geological structure and answer several major questions, including: whether the Newport-Inglewood fault Zone enters the City or veers westward toward the ocean, and whether and how the Santa Monica Fault Zone connects to the Hollywood Fault Zone. That seismograph process is very likely to simplify the preliminary mapping in Figure 1.

Another step would require utilizing the regulatory power to require that all new major developments directly address the presence of seismic faults as part of the project planning process. The seismic investigation requirement normally excludes light commercial and single family residential projects: the cost is prohibitive versus the life safety risk. This step has already been taken in the approval process for the 9900 Wilshire project (which Metro indicated is underlain by strands of the West Beverly Hills Lineament and Santa Monica Fault Zones). Expanding the requirement City-wide would be extremely beneficial.

A multi-step incremental approach may be the best approach to modernizing the City seismic policies:

1. Establish a City Engineering Geologist position (staff or contract) in order to assist in the preparation of City regulations regarding seismic hazards and ensure a consistent standard implementation for investigation and review in accordance with CGS standards and protocols.
2. Conduct a detailed geologic review of all available data in order to establish a geological model of the most likely fault structures within the City. Available data sources include ground water basin studies, fault damage reporting from Northridge, USGS gravity studies, geomorphic evaluations, oil field structural assessments, continuing fault investigations along the Hollywood Fault in Los Angeles and West Hollywood, and along the Santa Monica and West Beverly Hills Lineament Fault Zones in Century City and Beverly Hills, and a gathering of historic geotechnical reports for projects already built within and around the City of Beverly Hills. Figure 1 is based upon only a portion of the available information.
3. Contact other jurisdictions that have adopted seismic hazard zones (i.e. City of San Diego, County of Riverside, among many others). Adopt a City seismic hazard zone ordinance that incorporates the experience of other municipalities. At a minimum, the ordinance should include a mapping of potentially hazardous seismic zones plus a requirement for additional investigation or engineering requirements for new development within the restricted zones.
4. Assemble and retain data from site investigation reports and other sources in order to refine the potential seismic hazard zone mapping and local geological model. Periodically update the model as new information is obtained.
5. Make all submitted fault studies readily available to the public for use by future developers and researchers. Future investigators can build upon the work of previous investigations, ensuring continuity and reducing overall expense.
6. Support and consider sponsoring geologic studies of the most likely fault locations within the City. Collaboration and joint research efforts with the USGS, CGS and area universities in this effort are available and cost-effective. Ongoing research will allow restricted zones to be more tightly drawn or eliminated altogether.
7. Significantly revise the portions of the General Plan dealing with seismicity to identify the specific risks and mitigations available to the City. This is required for compliance with FEMA standards and a precondition to disaster relief funding.

A change in direction is already being implemented at the 9900 project. Several other steps could begin immediately with staff work and preparation.

References

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City of Santa Monica, Municipal Code, Article 8 Building Regulations, Section 12 Building Code, 8.12.50 Supplemental Land Hazards Zone Requirements, 11/27/07

City of West Hollywood, General Plan, Seismic Safety Plan, Geologic and Seismic Technical Background Report, General Plan Update, 03/15/10

City of West Hollywood, Municipal Code, Title 19 Zoning Ordinance, Article 19.3 Site Planning and General Development Standards, Chapter 19.32 Seismic Safety, 2001

Crook, R.C., Proctor, R.J., 1992; The Santa Monica and Hollywood Faults and the southern boundary of the Transverse Ranges Province; *in* Engineering Geology Practice in Southern California, edited by Bernard Pipkin and Richard Proctor, Association of Engineering Geologists, Special Publication No. 4, pp. 233–246.

Hildenbrand, T.G., Davidson, J.G., Ponti, D.J., Langenheim, V.E.; 2001; Implications for the formation of the Hollywood Basin from Gravity interpretations of the Northern Los Angeles Basin, California; United States Geological Survey Open-File-Report OFR 2001-394.

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EXHIBIT C

6/11/2014

PrimeSource Project Management Mail - 9900 INVESTIGATION STATUS



Timothy Buresh <tim.buresh@primesourcepm.com>

9900 INVESTIGATION STATUS

Susan Kirkgard <kirkgard@geoconinc.com>
To: Timothy Buresh <tim.buresh@primesourcepm.com>

Mon, Dec 30, 2013 at 5:10 PM

Hi-Tim,

I understand your position and urgency. I have forwarded your email to Patrick Perry, my client representative. Contact info will be forwarded to you as well.

Susan

*Susan Kirkgard, CEG
Senior Geologist
Geocon West, Inc.
818.841.8388 (office)
626.862.5920 (cell)*

Sent from my Verizon Wireless 4G LTE DROID
[Quoted text hidden]

9900 INVESTIGATION STATUS

Timothy Buresh <tim.buresh@primesourcepm.com>

Mon, Dec 30, 2013 at 5:01 PM

To: Roy Shlemon <rshlemon@jps.net>

Cc: "Brogan, Kevin H." <KBrogan@hfbllp.com>, "Laurence S. Wiener" <LWiener@rwglaw.com>

Roy,

Please see the message that I just sent Susan Krikgard requesting a release of the information from the 9900 investigation. We are running out of time - anything that you or the City could do to expedite any kind of release would be greatly appreciated. Even a partial interim report related to the WBHL faulting (or lack thereof) would be beneficial. Please help!

----- Forwarded message -----

From: Timothy Buresh <tim.buresh@primesourcepm.com>

Date: Mon, Dec 30, 2013 at 4:55 PM

Subject: 9900 INVESTIGATION STATUS

To: "Susan F. Kirkgard CEG" <kirkgard@geoconinc.com>

Cc: "Brogan, Kevin H." <KBrogan@hfbllp.com>

Susan,

Roy Shlemon and I were in an unrelated meeting several weeks ago. I understand from Roy Shlemon that the field portion of the work on 9900 has been completed and that your final report is anticipated sometime in January. Roy indicated that the findings presented to him so far included the following points:

- both trenches were clean, meaning that any fault activity is lower than bottom of trench (which I would guess to be in the +40,000 year old range)
- that you found at least one of the marker beds predicted by Miles Kenney in your trenches
- that the line of borings along Santa Monica Boulevard mirrored the findings from the BHHS investigation, from the 10000 Santa Monica investigation and from the KGS interim report in May 2013 - no active faults, and perhaps no faults at all to the bottom of boring depth
- that the line of borings along the western edge of the property (plus the strip covered by the trench) also indicate a lack of Santa Monica Boulevard faulting at least to the bottom of borings/bottom of trench
- that your overall findings were consistent with the KGS transect profiles shared with you

It sounds like the only faults encountered on/near the site were the one or two indicated by the El Rodeo and service station tank investigations around the NW corner of the site. I know that your owner had a choice whether to investigate this corner or to just do a project setback. Roy implied that your owner elected to do an expanded investigation and that you had already completed additional continuous core borings and perhaps even additional CPTs at the north end. Roy had the impression that your additional investigation had concluded that these faults were inactive.

If all of this is true, congratulations to you and your owner!

It is extremely unfortunate that the Metro Century City Fault Investigation was the first and only regional report dealing with this portion of Century City and west Beverly Hills. It is even more unfortunate that the Metro investigation was so wrong. Metro has now cost the BHUSD and several private parties including your client at 9900 millions of dollars in unnecessary investigation costs to chase faults that either do not exist or are so old as to pose little risk. Unfortunately, despite all of the individual study results that contradict Metro, Metro and its advocates continue to propagate the same position. That is why the BHUSD has chosen to augment and expand the KGS report to present an alternative regional model and explanation of the Cheviott Hills area of Century City and west Beverly Hills: there needs to be a published alternative model of the area, one that

incorporates all of the recent studies and information that was overlooked by Metro. The KGS report will be submitted to CGS. CGS is prepared to quickly review the final report. The report has taken on added importance with the pressure on CGS to complete the Santa Monica Fault AP mapping process. That is adding importance to the KGS report that goes way beyond our individual sites.

We are scrambling to make the KGS report as up to date and comprehensive as possible. We would obviously like to incorporate any 9900 findings that you can release. I understand that your client's prior instructions were to withhold all data. That position made some sense given the perceived risks involved. However, given that your field work is done and the positive outcomes of your investigation, we are respectfully requesting that the decision to embargo all information be revisited. Your investigation has covered a valuable chunk of real estate (geologically speaking) that is unavailable to BHUSD. Having a gap in the data will provide an opportunity for the naysayers at Metro and elsewhere to challenge our conclusions - and indirectly, your project's investigation and clearance.

The KGS report is an important tool in rebutting the incorrect claims made by the Metro Century City Fault Investigation once and for all. Please help us make this report as strong as possible and release the investigation results fro 9900 whether as your final report, as an interim report, as raw data sets. Unfortunately, the ongoing CEQA litigation is forcing us to turn in the KGS report very shortly. Time is of the essence.

I would be pleased to discuss this matter with your client. Please forward this message or send me the appropriate contact information. Thank you.

-

PrimeSource PM, LLC

Tim Buresh

5 Single Tree Lane

Rolling Hills Estates, CA 90274

424/903-9412 Cell

424/206-9633 Office

tim.buresh@primesourcepm.com

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PrimeSource PM, LLC

Tim Buresh

5 Single Tree Lane

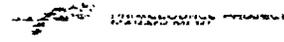
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424/206-9633 Office

tim.buresh@primesourcepm.com

EXHIBIT D



<miles.kenney@yahoo.com>

Reply-To: Miles Kenney <miles.kenney@yahoo.com>

To: Karen McLaurin Buresh <karen.buresh@primesourcepm.com>

Karen,

Below is 1 of 2 emails from Susan Kirkgard to me on January 27, 2014.

Miles

M D. KENNEY PHD, PG
KENNEY GEOSCIENCE - KGS

CELL -

State of California Professional Geologist (PG 8246)

An independent consulting Geologist

Specializing in fault hazards, structural geology, geomorphology, dune systems (aeolian systems), groundwater basin stratigraphic analysis, and alluvial fan flooding and deposition

**CONFIDENTIAL - SUBJECT TO ATTORNEY-CLIENT PRIVILEGE
AND/OR WORK PRODUCT DOCTRINE**

From: Susan Kirkgard <kirkgard@geoconinc.com>

To: Miles Kenney <miles.kenney@yahoo.com>

Sent:

RE: CONFIDENTIAL - 9900 Wilshire Investigation

Happy Monday Miles!

My client for 9900 is still not interested in sharing information. As it stands now, you will be able to see the data and results after the report is approved by the city.

We expect to submit our draft report mid-March and hope for a quick turn-around. Perhaps by the end of March we will submit our final report if all stays on schedule.

Sorry I cannot be more precise as to timing or offer up any preliminary results so far.

Hope that helps.

Susan

From: Miles Kenney [mailto:miles.kenney@yahoo.com]

Sent:

Susan Kirkgard

Subject: CONFIDENTIAL - 9900 Wilshire Investigation

Hi Susan and happy Monday...

I am checking regarding the 9900 Wilshire fault investigation.

Ya, I know, I suspect I am not allowed to see the results quite yet, but I would like to know when this may be possible and during what stage of the report that will be possible. For example, during the review process, or after.

Thank you!

Miles

Kenney GeoScience - kgs

Vista, CA, 92083

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State of California Professional Geologist (PG 8246)

An independent consulting Geologist

Specializing in fault hazards, structural geology, geomorphology, dune systems (aeolian systems), groundwater basin stratigraphic analysis, and alluvial fan flooding and deposition

**CONFIDENTIAL - SUBJECT TO ATTORNEY-CLIENT PRIVILEGE
AND/OR WORK PRODUCT DOCTRINE**

EXHIBIT E

Doug Evertz

From: Doug Evertz
Sent: Friday, February 07, 2014 11:56 AM
To: 'aalexander@aalexander.net'
Subject: BHUSD

Allan,

You will recall I represent Beverly Hill Unified School District and we spoke on January 29th regarding the 9900 Wilshire project. In particular, we discussed whether the District and its geologists could review the results of the 9900 project seismic investigation being prepared by Susan Kirkgard of Geocon. During our call, you indicated your client will not share the report until is it approved by Roy Shlemon at the City.

While I appreciate your client may not want to release a draft report at this time, I'm hoping our geologists can at least review and/or speak with Ms. Kirkgard about the field investigations performed last November and review the raw data that was obtained, including boring logs and trench mapping. Again, we are not asking to review any preliminary analyses or conclusions. Instead, we are simply asking for the opportunity for our respective geologists to talk to one another and review the objective underlying data that was obtained during the site investigation. I believe it is in the mutual interests of our clients to be working together.

Thanks and I'll look forward to hearing from you.

Doug

Douglas J. Evertz

Partner

650 Town Center Drive • Suite 550 • Costa Mesa, CA 92626

Voice: (714) 277-1702 | Fax: (714) 277-1777 | Cell: (949) 285-5448

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MURPHY & EVERTZ

Attorneys at Law



EXHIBIT F

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EMAIL ADDRESS DEVERTZ@murphyevertz.com

March 10, 2014

File No.
40085.00001

VIA E-MAIL AND U.S. MAIL

Mayor John Mirisch
Honorable Members of the City Council
City of Beverly Hills
455 North Rexford Drive
Beverly Hills, California 90210

Re: 9900 Wilshire Project

Dear Mayor Mirisch and Honorable City Council Members:

This law firm serves as special land use and litigation counsel to the Beverly Hills Unified School District ("District"). I am writing regarding the City Council Meeting held on March 4, 2014 and, in particular, Agenda Item D-7, the consideration of an agreement with Stegeman and Kastner, Inc. for construction oversight coordination services for the 9900 Wilshire Project ("Agenda Item"). I am writing to correct certain misstatements that were contained in the staff report and put forth at the Council's consideration of this matter. Unfortunately, despite continued communication on many on-going matters between the City and the District, City staff did not advise any representative of the District that this matter was to be considered at the Council's March 4th meeting. If the District had been timely apprised that the Agenda Item would be considered by the City Council on March 4th, the District would have been present at the Council meeting to present clear, concise and accurate record in this matter. Because the District was denied this opportunity, we are writing to correct any misimpressions the Council may have about the District's actions in this matter. We are further writing to advise you that, contrary to the staff report accompanying the Agenda Item, the District had not approved the Stegeman and Kastner, Inc. contract.

The District's involvement in connection with this matter dates back to 2008 when the City approved a project to begin construction in 2009 and in its approval requested District approval of certain matters due to the proximity of the project site to several District schools and property. The District was not a party to that approval agreement. The project sat idle for many years as the original developer went bankrupt and the property changed hands multiple times. The District had no involvement with the project over that time. In mid-late December of 2013, David Yelton contacted Superintendent Dr. Gary W. Woods regarding the potential selection of Stegeman and Kastner, Inc. to oversee the latest iteration of the project. At no point during this time were there any discussions that the City was requesting a response from the District within any specific time frame, let alone the fourteen (14) days put forth by City Staff at the March 4th City Council meeting. At the time Mr. Yelton contacted the District about this matter, the District was entering the time period of its Winter Break through January 5, 2014.

Mayor John Mirisch and City Council Members
City of Beverly Hills
March 10, 2014
Page 2

As City staff was advised by Superintendent Woods, on January 21, 2014, the District Board met to consider the City's request - - and again, there was no indication from the City that the City wanted District approval of Stegeman and Kastner, Inc. within a certain period of time or by a date certain date or even that the matter was time sensitive. The District took no action on this matter at its January 21st meeting. At no time, either prior to the January 21st meeting or after, was the District provided any updated information on either the project, as presently proposed, or on the current qualifications or proposal by Stegeman and Kastner, Inc. for services in connection with the project. Superintendent Woods advised City staff of the outcome of the January 21st District Board meeting.

The District only learned of the consideration of this Agenda Item late afternoon on March 4th by pure happenstance, when reviewing the City Council agenda for an unrelated matter. The District was surprised to see the statements in the staff report accompanying the Agenda Item, stating that, "The selection of Stegeman and Kastner, Inc. was reviewed and *jointly selected* by the Beverly Hills Unified School District and the City to provide construction management plan services." As set forth above, the District never approved and "jointly selected" Stegeman and Kastner, Inc.

Immediately upon learning of the Agenda Item on the afternoon of March 4th I sent to you, Mr. Kolin and Mr. Yelton an email requesting the Agenda Item be continued. Questions were raised as to why my email request was coming in at the eleventh hour and why no one from the District was in attendance at your meeting. The reason, of course, is that the District had not previously been apprised of the Agenda Item and at the very time of the City Council meeting on March 4th, the District Board was holding its own regularly-scheduled Board meeting which required the attendance of Board members and staff.

It was incorrectly represented at the City Council meeting that Superintendent Woods was personally apprised by City Staff that the Stegeman and Kastner, Inc. contract would be on the March 4th City Agenda. This is not the case. When the District, on its own, ultimately learned the afternoon of March 4th that (i) the Stegeman and Kastner, Inc. contract was on the City's Agenda, and (ii) it was being represented that the District had "approved" the contract, I immediately sent my email to notify you that was not in fact the case. The District requested that this particular Agenda Item be continued for the sole and limited purpose of affording the School Board an opportunity to consider the request. This reasonable request was denied.

Mayor John Mirisch and City Council Members
City of Beverly Hills
March 10, 2014
Page 3

During the course of the Council's consideration of the Agenda Item, statements were made about the District's motivations as they relate to the 9900 Wilshire Project, the developer, and securing seismic data. I will not detail each one of those here. Please be advised, however, that the District and the developer are working cooperatively together and have exchanged, and continue to exchange, seismic data. The District has no intention of attempting to delay this project in any manner in an effort to obtain data it already has, or which is not yet complete, but expects to receive in due course. This District would hope that the City will continue to foster this cooperation and sharing of data and information on a subject that is so important to all of us.

As you are aware, the City and the District share many common interests and work together very effectively on many matters. For example, the Mills Act items on the same March 4th Agenda, had been the subject of repeated contact between the City and the District before being placed on the March 4th Agenda. The City and the District have enjoyed a positive and mutually beneficial working relationship. The District hopes that the City's course of action in connection with the Agenda Item is an aberration and that the spirit of openness and cooperation will continue to prevail in our dealings.

Sincerely,



Douglas J. Evertz of
MURPHY AND EVERTZ LLP

DJE/ssp

cc: Larry Wiener, City Attorney (Via E-Mail)
School Board, Beverly Hills Unified School District (Via E-Mail)
Dr. Gary W. Woods, Superintendent (Via E-Mail)

EXHIBIT G



Jeffrey Kolin, City Manager

March 25, 2014

Mr. Douglas J. Evertz
Murphy and Evertz, LLP
650 Town Center Drive, Suite 550
Costa Mesa, CA 92626

Re: 9900 Wilshire Project

Dear Mr. Evertz,

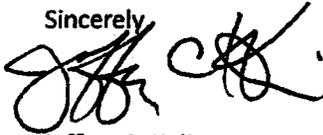
Thank you for your letter on behalf of the Beverly Hills School District ("District") dated March 10, 2014. In your letter, you corrected statements made by staff in their report presented to City Council on March 4, 2014 regarding consideration of an agreement with Stegeman and Kastner, Inc. for construction oversight services at the 9900 Wilshire project. You are correct that staff did not notify the District that this item would be on the agenda for our March 4, 2014 meeting. For this oversight, I apologize on behalf of the City. We have worked cooperatively with the school district in the past and wish to continue our positive and mutually beneficial working relationship. We will make sure you are notified of future agenda items.

The District in the past has been provided with the conditions of approval for this project. Several conditions were included to provide special consideration of District concerns particularly related to any construction impacts that may impact El Rodeo Elementary School. The condition related to selection of the Construction Management Plan Coordinator, specifically condition #33a, states that [the Coordinator] "shall be mutually agreed upon by the City of Beverly Hills and the Beverly Hills School District. If the District does not agree with the City on a Coordinator within a 14 calendar day period after being presented with the list of qualified coordinators, the Director of Community Development shall have the authority to select the Coordinator". City staff understood that the request went before the District Board on January 21, 2014 and no action was taken. Having received no approval or denial, the Director selected the Coordinator as provided for in condition #33a. Again, I apologize and recognize there could have been better communication. Steps have already been taken to improve the process of coordinated review and approval by the City and the District.

The timing in this particular case was critical. Demolition on the 9900 Wilshire project is expected to continue for approximately fifty (50) days. There is about eight (8) weeks of preliminary monitoring that must be completed prior to the start of demolition. Our staff communication and representation was inadequate, we will do better in the future. We felt it was important to move forward with the District concerns foremost in mind to ensure complete demolition while El Rodeo School was not in session.

We appreciate the good relationship that the City has with the District and commit to ensuring that our partnership remains open and cooperative.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeffrey C. Kolin', written over a printed name.

Jeffrey C. Kolin
City Manager
City of Beverly Hills

cc: Beverly Hills City Council
Larry Wiener, City Attorney
School Board, Beverly Hills Unified School District
Dr. Gary W. Woods, Superintendent

EXHIBIT H

From: Timothy Buresh <tim.buresh@primesourcepm.com>
Sent: Thursday, May 22, 2014 10:00 AM
To: Laurence S. Wiener; Jeff Kolin; David Yelton
Cc: Doug Evertz
Subject: 9900 Site Investigation Results and Core Access

Dear Larry, Jeff and David:

I understand that the 9900 seismic investigation report is complete and awaiting final review by David's office. We earlier received partial results directly from the property owner. Those partial and preliminary reports identified faulting at the NW corner of the site and determined that further investigation was required. Subsequently the property owner drilled continuous core borings along Wilshire Boulevard and apparently those cores were considered insufficient by the City to conclusively determine the activity level of the faults. We have since learned that the property owner declined to perform trenching or other steps to clear those faults and has elected to take a setback.

While the decision to take a setback instead of clearing a fault is the property owner's prerogative, it creates an immediate issue regarding the seismic safety of the El Rodeo campus and of the adjacent portions of the City of Beverly Hills. The City must now consider the fault potentially active which has negative implications for the City. For example, Dr. James Dolan has repeatedly insisted that this fault continues across the City of Beverly Hills and connects to the Hollywood fault system and that the entire fault system is interrelated and active - the theory presented in the MTA Century City Fault Investigation. If true, this conclusion would be very significant to the seismic safety of the entire northern side of the City; if left unanswered, the potential will raise concern and risk perception, perhaps needlessly. It is clearly in the City's best interests to determine conclusively whether these inferred faults are or are not active.

The current status of the 9900 investigation is also problematic for the BHUSD as the faults in question may intersect the El Rodeo campus. The indeterminate status conclusion apparently reached at 9900 differs substantially from BHUSD's preliminary seismic investigation of the El Rodeo campus which concluded that the faults appeared to be inactive. This creates a serious concern for the BHUSD and will undoubtedly raise a regulatory concern with CGS. Because the safety of children is of paramount concern to the BHUSD, additional investigation of the faults has already been authorized by the Board for immediate action. The lack of resolution of the status of the faults found in the 9900 investigation will have far reaching unintended consequences for the City and BHUSD. A cooperative approach is recommended to resolve this issue.

The BHUSD formally requests that prior to the finalization of the investigation, report and conclusions, and City acceptance of that report, the City allow independent confirmation of the 9900 data and analysis by geologists retained by the BHUSD. The BHUSD specifically requests a copy of the latest draft report including all appendices, and that BHUSD geologists be given immediate access to directly observe the continuous core samples taken during the 9900 investigation. In exchange, the BHUSD will share all information derived from its further investigation of these faults. Joint participation in the core review by the City's peer reviewer or other experts is invited. We believe that the City has the regulatory power in an open approval process to share this information and to obtain access to these cores. There is no obvious downside for the property owner as a determination of inactivity at El Rodeo would extend to the 9900 site. There is no downside for the City as the presence of a potentially active fault has already been established and conclusively determining the safety of children, residents and property is a well established interest and responsibility of the City.

The BHUSD is prepared to act immediately upon access to these cores wherever they are being stored. Thank you for your assistance.

PrimeSource Project Management

Tim Buresh
One Civic Plaza Drive, Suite 500
Carson, CA 90745
424/903-9412 Cell

EXHIBIT I



Timothy Buresh <tim.buresh@primesourcepm.com>

9900 Investigation

Laurence S. Wiener <LWiener@nwglaw.com>

Wed, May 28, 2014 at 6:09 PM

To: Timothy Buresh <tim.buresh@primesourcepm.com>, Karen McLaurin Buresh <karen.buresh@primesourcepm.com>

Cc: Doug Evertz <DEvertz@murphyevertz.com>, David Yelton <dyelton@beverlyhills.org>

Tim,

My secretary is arranging for a messenger to have the hard copy delivered tomorrow. If we have an electronic copy, I am happy to provide an electronic copy if that is easier for you. Let me know which you prefer.

We understand the desire for the cores and, as I mentioned to you, I have spoken to David Yelton several times about this issue in the past two days. He is working directly with GeoCon to try to determine if the cores still exist and to get that access.

Larry

From: Timothy Buresh [mailto:tim.buresh@primesourcepm.com]

Sent: Wednesday, May 28, 2014 5:43 PM

To: Laurence S. Wiener

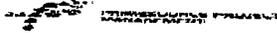
Cc: Doug Evertz; Karen McLaurin Buresh

Subject: 9900 Investigation

[Quoted text hidden]

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NOTICE: This communication may contain privileged or other confidential information. If you are not the intended recipient of this communication, or an employee or agent responsible for delivering this communication to the intended recipient, please advise the sender by reply email and immediately delete the message and any attachments without copying or disclosing the contents. Thank you.



Timothy Buresh <tim.buresh@primesourcepm.com>

9900 Investigation

Timothy Buresh <tim.buresh@primesourcepm.com>

Wed, May 28, 2014 at 5:42 PM

To: "Laurence S. Wiener" <LWiener@rwglaw.com>

Cc: Doug Evertz <devertz@murphyevertz.com>, Karen McLaurin Buresh <karen.buresh@primesourcepm.com>

Larry -

I spoke to Roy Shlemon after our conversation. He confirmed that the City was given an electronic copy of the 9900 investigation. Please send a copy as soon as possible. Dr. Shlemon also indicated that he has not been approached by anyone from the City regarding coordinating access to the 9900 cores. These cores represent a valuable asset to the BHUSD and its efforts to evaluate geologic conditions at the El Rodeo school. This particular area is very complicated geologically making any characterization task difficult; the dearth of hard data across the area makes it even more difficult. If the City is unable to produce the cores, BHUSD will be forced to replicate the work in our investigation, an avoidable and unnecessary expense.

PrimeSource Project Management

Tim Buresh

One Civic Plaza Drive, Suite 500

Carson, CA 90745

424/903-9412 Cell

424/287-0760 Office

tim.buresh@primesourcepm.com

EXHIBIT J



David Yelton, Acting Building Official
Community Development Department

May 19, 2014

Allen Matkins Leck Gamble Malory & Natsis LLP
Attention: Patrick A. Perry
515 South Figueroa Street, 9th Floor
Los Angeles, CA 90071

Subject: Acceptance of Peer-Review Recommendation: "Investigations for Potential Surface Fault Rupture:" 9900 Wilshire Boulevard, City of Beverly Hills, California.

Dear Mr. Perry:

The "Fault Rupture Investigation" (Investigation) for the proposed development at 9900 Wilshire Boulevard, in the City of Beverly Hills, California as prepared by your Consultants-of-Record, Geocon West, Inc. (Geocon) has been peer reviewed by the City's consultant, Roy J. Shlemon & Associates, Inc. (RSA). The peer review included critique of the "Phase I Investigation" (comprehensive literature review titled "Fault Rupture Hazard Evaluation, Project No. A9009-06-01, dated April 22, 2013), and the "Phase II Site-Specific Fault Rupture Investigation" (Project No. A9009-06-01A dated May 6, 2014). The geologic investigation and peer review are required by the City in conformance with the current building codes and with current geologic-standards-of practice that ensure public health, safety and welfare.

Accordingly, in reliance on the technical documentation and assurances provided by the Consultants-of-Record, including their opinions and conclusions, the City of Beverly Hills now formally accepts the Technical Recommendations of the Reviewer (attached).

Sincerely,

A handwritten signature in black ink that reads "D. Yelton".

Attachment: Roy J. Shlemon & Associates, Inc. "Recommendation For Acceptance," May 2014

EXHIBIT K

ROY J. SHLEMON & ASSOCIATES, INC.
Geologic and Environmental Consultants

P.O. Box 3066
Newport Beach, CA 92659-0620

Tel: 949-675-2696
E-mail: rshlemon@jps.net

Quaternary Geology
Economic Geomorphology
Soil Stratigraphy
Geoarchaeology
PG 2867; CPG 1766; CPESC 2167

RECOMMENDATION FOR ACCEPTANCE

**INVESTIGATIONS FOR POTENTIAL SURFACE FAULT RUPTURE
9900 Wilshire Boulevard, City of Beverly Hills, California**

This document summarizes a peer review of a "Fault Rupture Investigation" for a proposed development at 9900 Wilshire Boulevard in the City of Beverly Hills, California. The City requires the peer review in conformance with building codes and to ensure public health, safety and welfare.

The investigations were carried out by Geocon West, Inc. (Geocon; Consultants of Record) on behalf of Allen Matkins Leck Gamble Malory and Natsis, LLP (Los Angeles), a legal firm representing the Applicant. The main purpose of the Geocon investigation was to determine if previously inferred faults projected into the site are "active" according to current State of California definition (surface or near-surface ground rupture within the last 11,500 years). Geocon (2013) previously submitted a comprehensive literature review ("Phase I investigation") of the regional geological framework and the neotectonic setting. The Consultants have now completed "Phase II" of their investigations, mainly site-specific subsurface exploration that conforms to the required standard-of-practice for assessing potential surface fault rupture; mainly, excavating and geologically documenting (logging) trench exposures, advancing cone penetrometer tests (CPT), and drilling and interpreting continuous-core samples within and immediately adjacent to the 9900 Wilshire site.

The Geocon, Phase II report now provides appropriate geologic maps, trench logs, cross sections, boring logs, soil-stratigraphic profiles, groundwater elevations and other data applicable to assess potential fault presence and activity. Accordingly, the fundamental conclusions of the Consultants-of-Record are:

1. That Geocon has now completed the necessary on-site investigations thus conforming to current standards-of-practice for fault-activity assessments in southern California;

Peer Review

Page 2

2. That previous investigations near the 9900 Wilshire site indicated possible NW-trending splays of the active Newport-Inglewood fault zone and generally E-W and NE trending splays of the Santa Monica fault zone potentially impacted the central and northwest corner of the proposed development.
3. That Geocon now addresses potential on-site faulting by emplacing and logging 3, 20+ ft deep trenches, along the south, east and west sides of the property, respectively; by interpreting two NE-SW seismic lines across the property (within the existing parking structure); and by assessing the potential for on-site impact of Santa Monica fault zone splays in the northwest part of the site and elsewhere by interpreting geologic and soil-stratigraphic continuity as recorded in continuous cores and in CPT transects;
4. That, as exposed in the site trenches, datable sediments were identified as to their continuity and age, based mainly on relative development of soil (pedogenic) profiles, particularly remnant argillic horizons (Appendix E).
5. That trench and core-exposed sediments generally exceed 20,000 to 30,000 in age, and therefore are of sufficient antiquity to confidently assess potential offset of Holocene (11,500 yr) sediments;
6. That last displacement of previously postulated, NW-trending splays of the Newport-Inglewood fault, if present, took place more than 11,500 years ago, and hence deemed "not active" according to State of California definition.
7. That previously inferred NE-trending splays of the Santa Monica fault zone through the central part of the site similarly do not break pre-Holocene sediments as exposed in site trenches and as interpreted in site seismic lines;
8. That several splays of the Santa Monica Fault Zone (West Beverly Hills Lineament[s]), designated by Geocon as faults "F through J," are identified offsite, immediately adjacent to the north and west boundary of the property; and that faults G, H, and I, respectively, cut Holocene age sediments as deduced from interpretation of cores and CPT lines in this area and therefore are "active."
9. That Fault J, projecting across the northwest corner of the site, is pre-Holocene in age and therefore does not warrant mitigation for surface fault rupture.

Peer Review

Page 3

10. That, nevertheless, owing to uncertainties in fault dip and projection between cores and CPT lines, Geocon reasonably recommends establishment of a 50-ft wide structural setback (for habitable structures) parallel to the NW corner of the site;

Accordingly, the Consultants of Record have now completed a standard-of-practice investigation to assess potential active faulting at the 9900 Wilshire site in the City of Beverly Hills.

Therefore, based substantially in and on reliance of the technical documentation and assurances provided by the Consultants-of-Record, including their opinions and conclusions, and on our present understanding as to the possible presence and relative impact of active faults within and adjacent to the proposed development, we conclude that the combined Phase I and Phase II Geocon investigations now meet the current geologic standard-of-practice for evaluating the site-specific potential for surface fault rupture. Accordingly, the combined reports, and their fundamental conclusions, thus warrant acceptance by the City of Beverly Hills.

Please note that the Geocon reports focus solely on potential surface or near-surface fault rupture; and that they specifically do not address potential high seismic accelerations, ground deformation or other structural design and geotechnical requirements required by applicable building codes or by present professional engineering and geological standards of practice. It is therefore incumbent upon Geocon, or other consultants, to provide this information to the City of Beverly Hills for review and potential acceptance prior to issuance of building permits.

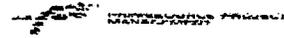
Recommended for Acceptance



Roy J. Shlemon, Ph.D.
Peer Reviewer

May 2014

EXHIBIT L



https://mail.google.com/mail/u/0/?ui=2&ik=e57a8a3a16&view=pt&q=9900&qs=true&search=query&msg=146494a11b26fbcc&siml=146494a11b26fbcc

FW: 9900 Wilshire Blvd. Project - Soil Core Samples Re. Seismic Fault Rupture Investigation

Laurence S. Wiener <LWiener@rwglaw.com>
To: Timothy Buresh <tim.buresh@primesourcepm.com>

Thu, May 29, 2014 at 11:42 AM

Tim,

I am sorry to report to you that I just received this email from David Yelton. If there is another question that I should be asking, please let me know.

Larry

From: David Yelton [mailto:dyelton@beverlyhills.org]
Sent: Thursday, May 29, 2014 11:16 AM
To: Laurence Wiener
Subject: 9900 Wilshire Blvd. Project - Soil Core Samples Re. Seismic Fault Rupture Investigation
Importance: High

Hi Larry,

I just received confirmation from Susan Kirkgard, Senior Geologist for Geocon, Inc. that the "Core Boxes" were disposed of as part of the building pre-demolition by the on-site general contractor.

David Yelton, CBO

Plan Review and Building Inspection Manager

Department of Community Development

Development Services Division

City of Beverly Hills

455 N. Rexford Drive

Beverly Hills, CA 90210

P: 310.285.1154 | F: 310.273.0972

E-mail: dyelton@beverlyhills.org

EXHIBIT M

Subject: FW: Geotechnical Report for 9900 Wilshire Blvd.

From: Jeffrey C. Kolin [<mailto:jkolin@beverlyhills.org>]

Sent: Friday, May 30, 2014 10:52 AM

To: Gary Woods

Subject: Geotechnical Report for 9900 Wilshire Blvd.

Hi Gary,

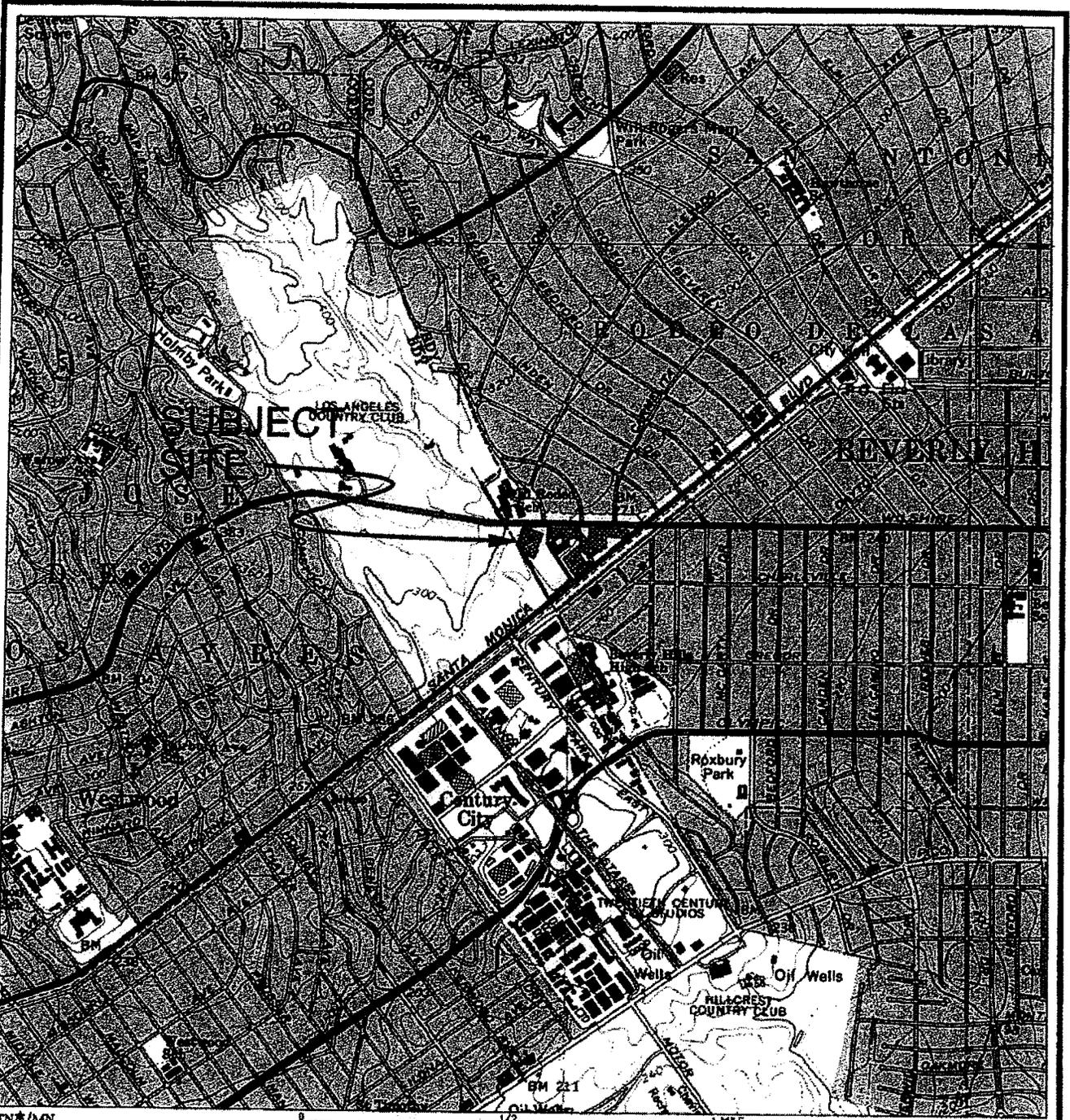
I wanted to give you a quick update on the seismic report for the 9900 Wilshire Blvd project. We have been working with the developer of the project and our peer reviewer, Dr. Schlemen to complete the report. We have talked several different times about the District's interest in getting access to the report and its data. I got an email from Tim Buresh last Thursday, May 22, asking to allow the District to independently confirm the data and analysis in the report with geologists hired by BHUSD. Unfortunately, the core samples were destroyed when preparations began for demolition and toxic materials removal on the site and the City has formally accepted the report based on our peer review process and staff review.

A hard copy of the report and a CD has been provided to Tim Buresh. Larry Wiener has spoken directly with Tim to provide him with this background information and to express our continued interest to work with the District. I wanted to make sure you were aware of the status of this report and of Tim's request in case you received phone calls from Tim or board members.

Jeff Kolin
City Manager
City of Beverly Hills
310-285-1012
jkolin@beverlyhills.org

The City keeps a copy of all E-mails sent and received for a minimum of 2 years. All retained E-mails will be treated as a Public Record per the California Public Records Act, and may be subject to disclosure pursuant to the terms, and subject to the exemptions, of that Act.

EXHIBIT N



TN+ / MN
134°

1000 FEET 0 500m 1000m MILE

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REFERENCE: U.S.G.S. TOPOGRAPHIC MAPS, 7.5 MINUTE SERIES, BEVERLY HILLS, CA QUADRANGLE

GEOCON
WEST, INC.



ENVIRONMENTAL GEOTECHNICAL MATERIALS
3303 N. SAN FERNANDO BLVD. - SUITE 100 - BURBANK, CA 91504
PHONE (818) 841-8388 - FAX (818) 841-1704

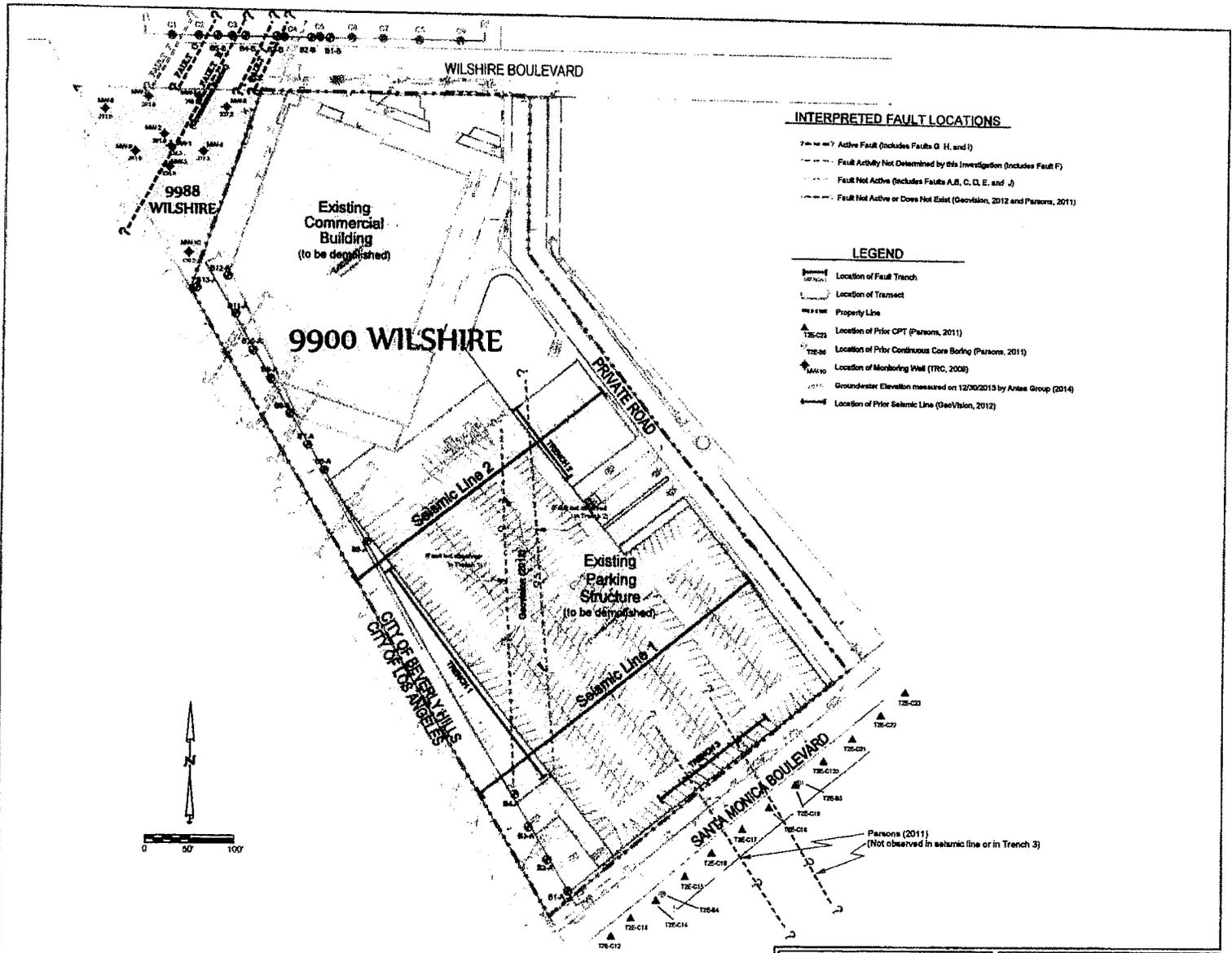
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VICINITY MAP

FAULT RUPTURE HAZARD INVESTIGATION

9900 WILSHIRE BOULEVARD
BEVERLY HILLS, CALIFORNIA

MAY 2014	PROJECT NO. A9009-06-01A	FIGURE 1
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INTERPRETED FAULT LOCATIONS

- Active Fault (Includes Faults G, H, and I)
- Fault Activity Not Determined by this Investigation (Includes Fault F)
- Fault Not Active (Includes Faults A, B, C, D, E, and J)
- Fault Not Active or Does Not Exist (Geovision, 2012 and Parsons, 2011)

LEGEND

- Location of Fault Trench
- Location of Trench
- Property Line
- ▲ Location of Prior CPT (Parsons, 2011)
- Location of Prior Continuous Core Boring (Parsons, 2011)
- ◆ Location of Monitoring Well (TRC, 2008)
- ▲ Groundwater Elevation measured on 12/30/2013 by Artes Group (2014)
- Location of Prior Seismic Line (Geovision, 2012)

Parsons (2011)
(Not observed in seismic line or in Trench 3)

BASE MAP: Modified after Peones, 2013, "Scratch Exhibit", Job No. 1844010100, Sheet 1 of 1

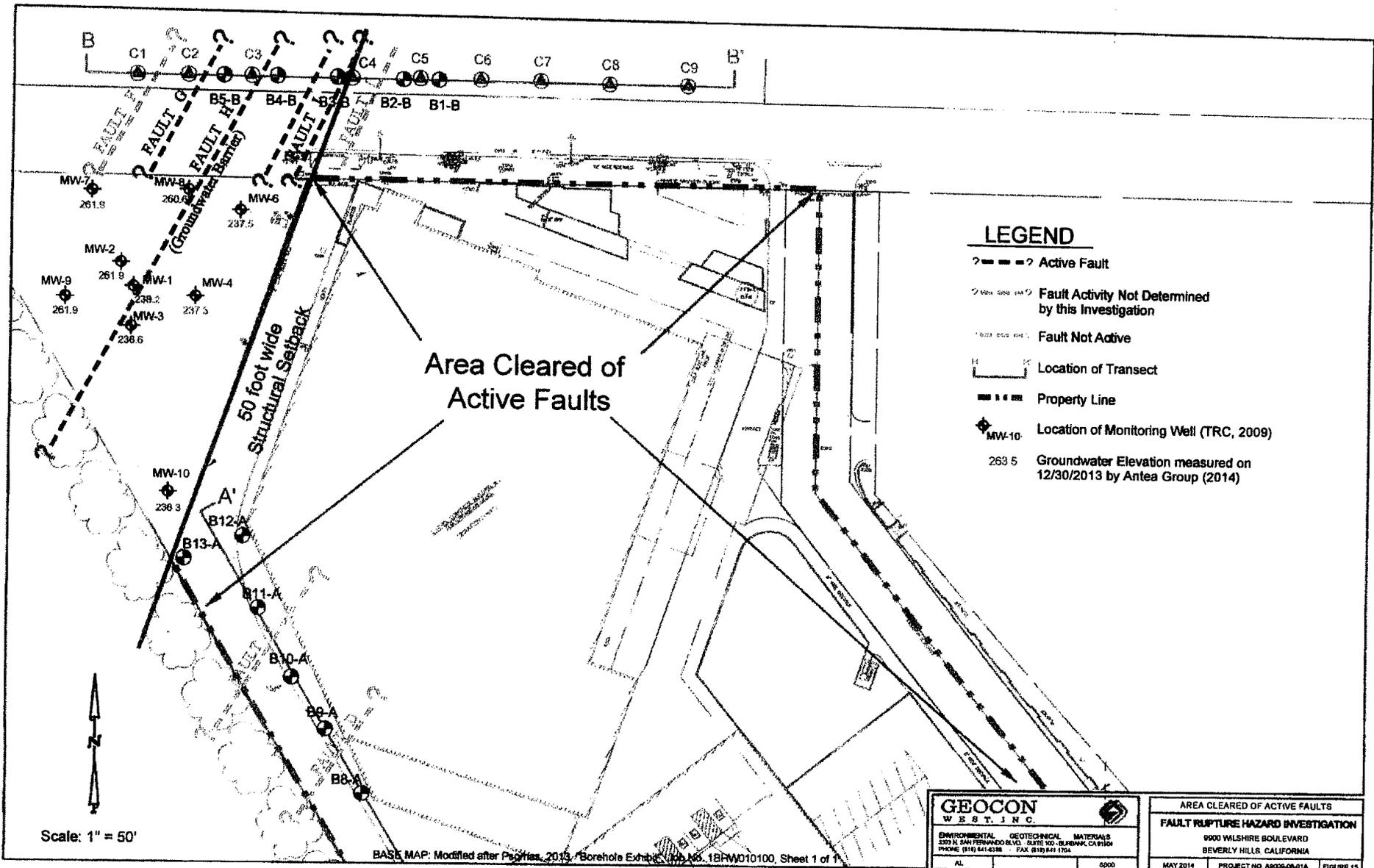
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W B S T I N C.

ENVIRONMENTAL GEOTECHNICAL MATERIALS
232 1/2 SAN FERNANDO BLVD., SUITE 100, BURBANK CA 91504
PHONE (818) 841-4388 FAX (818) 841-1704

AL 5000

INTERPRETED FAULTS
FAULT RUPTURE HAZARD INVESTIGATION
9900 WILSHIRE BOULEVARD
BEVERLY HILLS, CALIFORNIA

MAY 2014	PROJECT NO A9009-05-01A	FIGURE 14
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BASE MAP: Modified after Parsons, 2013, Borehole Exposed, Job No. 18PW010100, Sheet 1 of 1

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WEST, INC.

ENVIRONMENTAL GEOTECHNICAL MATERIALS
200 N. SAN FERNANDO BLVD. SUITE 100 - BURBANK, CA 91504
PHONE (818) 841-4338 FAX (818) 841-1704

AL 0000

AREA CLEARED OF ACTIVE FAULTS		
FAULT RUPTURE HAZARD INVESTIGATION		
9900 WILSHIRE BOULEVARD		
BEVERLY HILLS, CALIFORNIA		
MAY 2014	PROJECT NO. A9009-06-01A	FIGURE 13