

**From:** [Board of Supervisors, \(BOS\)](#)  
**To:** [BOS Legislation, \(BOS\)](#)  
**Subject:** FW: BoS Hearing Supporting Materials - 530 Sansome  
**Date:** Friday, September 24, 2021 4:00:36 PM  
**Attachments:** [PykeResumeLegal.pdf](#)  
[Pyke letter re 447 Battery Street.pdf](#)

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**From:** Chandni Mistry <chandni@zfplaw.com>  
**Sent:** Friday, September 24, 2021 3:56 PM  
**To:** Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>  
**Cc:** Brian O'Neill <brian@zfplaw.com>; Ryan Patterson <ryan@zfplaw.com>  
**Subject:** BoS Hearing Supporting Materials - 530 Sansome

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Good afternoon,

Please find attached supporting documents to add to the file for 530 Sansome. This is for the hearing that is scheduled for October 5<sup>th</sup>.

Thank you,

Chandni Mistry  
Administrative Assistant  
Zacks, Freedman & Patterson, PC  
601 Montgomery Street, Suite 400  
San Francisco, CA 94111  
Telephone: (415) 956-8100  
Facsimile: (415) 288-9755  
[www.zfplaw.com](http://www.zfplaw.com)

**PLEASE NOTE THAT ZACKS, FREEDMAN & PATTERSON HAS MOVED. EFFECTIVE MARCH 9, 2021, OUR NEW ADDRESS IS:  
ZACKS, FREEDMAN & PATTERSON, PC  
601 MONTGOMERY STREET, SUITE 400  
SAN FRANCISCO, CA 94111  
PHONE, FAX AND EMAIL ADDRESSES REMAIN THE SAME.**

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**Robert Pyke, Consulting Engineer**

Zacks Freedman & Patterson PC  
600 Montgomery Street, Suite 400  
San Francisco CA 94111-2607

Attention: Brian O'Neill, Esq.

Re: Potential Impact of the Construction of the 530 Sansome Street Hotel Project to the 447 Battery Street Building, San Francisco CA

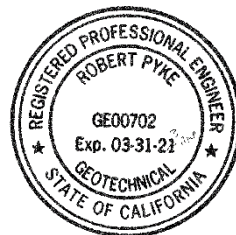
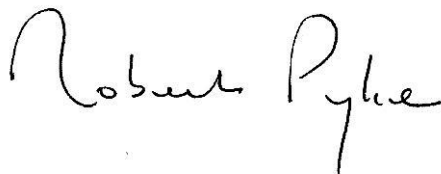
Dear Brian,

I have reviewed both the Geotechnical Investigation Report prepared by Langan Engineering and Environmental Services, Inc., dated December 20, 2019, and the letter to you dated July 28, 2021, by Eddy T. Lau, Geotechnical Engineer.

I basically concur with Mr Lau's findings. It is critically important to establish what kind of foundation supports 447 Battery Street and to tailor underpinning and shoring requirements for that foundation. An impervious shoring system is likely required in order to maintain the existing groundwater level under 447 Battery Street. Tiebacks under the building are not acceptable for the present condition and make no sense should 447 Battery be redeveloped at some future point.

Please let me know if I can be of further assistance.

Regards,



Robert Pyke Ph.D., G.E.

# **Robert Pyke, Consulting Engineer**

## **RESUME**

### **EDUCATION**

B.E. in Civil Engineering, University of Sydney, 1963  
Ph.D. in Civil Engineering, University of California, 1973  
[major in geotechnical engineering; minors in rock mechanics  
and environmental planning]

### **EXPERIENCE**

Australian Department of Works - 1964 to 1968. Staff Engineer engaged in investigations, design and construction of a major earth-and-rockfill dam and trunk water supply pipelines.

University of California, Berkeley - 1969 to 1973. Teaching and Research Assistant; conducted research for Ph.D. thesis on settlement and liquefaction of sands during earthquakes.

Dames & Moore, San Francisco - 1973 to 1976. Project and Senior Engineer on a variety of projects involving the behavior of foundations and earth structures subjected to wave and earthquake loadings including nuclear power plants, earth dams, pipelines, harbor facilities and offshore platforms.

Self Employed - 1977 to present - Individual consultant on special geotechnical, earthquake and water resources engineering problems.

### **REGISTRATIONS**

Civil Engineer, California, 1976, CE 27248  
Geotechnical Engineer, California, 1987, GE 702

### **PROFESSIONAL SOCIETIES**

American Society of Civil Engineers  
Earthquake Engineering Research Institute  
Seismological Society of America  
United States Society on Dams

## **RECENT MAJOR PROJECT EXPERIENCE**

EPRI/DoE Ground Motion Study - Developed guidelines for conduct of site investigations and site response analyses including updated generic shear modulus reduction and damping curves.

Mormon Island Auxiliary Dam, California - Member of consulting board (with J.K.Mitchell, L.W.D.Finn and R.B.Peck) for Bureau of Reclamation on seismic upgrade.

Seven Oaks Dam, San Bernardino County, for Los Angeles District, Corps of Engineers. Consultant on design and construction of major dam adjacent to the San Andreas fault.

San Francisco - Oakland Bay Bridge, East Span Seismic Safety Project - With Earth Mechanics Inc., member of seismic ground motion team, team leader for studies of seismic stability of the Oakland Mole.

Yucca Mountain Nuclear Waste Repository - Member of Seismic Advisory Panel (with J.C.Stepp, C.A.Cornell, R.P.Kennedy and C.A.Costantino).

San Pablo Dam, Orinda, California - Member of board of technical review board (with J.K.Mitchell and Don Babbitt) for East Bay Municipal Utility District on seismic upgrade to a major dam in a populated area.

Chemical and Metallurgical Research Laboratory Replacement, Los Alamos National Laboratory. Consultant on seismic issues associated with design of major nuclear research facility.

Idaho National Laboratory. Member, Blue Ribbon Panel for review of seismic design of IWTU (with C.A.Costantino, T.Houston, R.Lee and W.Lettis).

Bay Area Rapid Transit System, San Francisco Transition Structures and TBT Uplift Studies. Consultant to Parsons Brinkerhoff and BART.

Treasure Island, San Francisco Bay. Key consultant to development team on proposed \$6 billion commercial-residential re-development of former Navy base located on potentially liquefiable sands and soft Bay Muds. Facilitator of Independent Review Panel comprised of Professors J.K.Mitchell, I.M.Idriss, R.B.Seed and R.W.Boulanger.

Hondsbosche and Pettermer Dikes, for ARCADIS NL, the Netherlands. Third party review of proposed raise of critical North Sea dike.

Delta Protection Commission, California. With University of the Pacific Business Forecasting Center, principal contributor to Delta Economic Sustainability Plan.

Navy Base Container Terminal, for South Carolina State Ports Authority. Review and analysis of causes of excessive deformations of cantilever containment wall.

## **SPECIALIZED EXPERIENCE**

### **AS EXPERT WITNESS OR CONSULTANT**

"Superwell" litigation, San Bernadino, California - Consultant to East Valley Water District and others on potential for damage resulting from earthquake-induced liquefaction - for Attorney Cynthia Lundvigsen.

McDonald Island, Sacramento-San Joaquin Delta - Expert witness for defendants in lawsuit resulting from 1982 levee failure - for Boornazian, Jensen and Garthe, Oakland.

Yuba River Levee Failure - Expert witness for plaintiffs in lawsuit resulting from 1986 levee failure - for the Law Offices of Stanley J. Bell.

Anderson Ranch Homeowners' Association, Danville - Consultant/expert witness on dispute involving allegation of ancient landslide and litigation resulting from subsequent landslide - for the Law Offices of Ronald M. Abend. Supervision of repair for Homeowners' Association.

Stone Valley Road Pipeline, Alamo - Expert witness for EBMUD in defense of construction claims - for Crosby, Heafey, Roach and May.

Mission at Meadow Hills, Fremont - Expert witness on claims for construction defects in townhouse development - for Abend, Lepper, Jacobsen, Schaefer & Hughes.

Lafayette Pointe, Lafayette - Expert witness on claims for construction defects in condominium development - for Abend, Lepper, Jacobsen, Schaefer & Hughes.

Lighthouse Cove, Redwood Shores - Consultant to Edward Margason and Berding & Weil on differential settlement of town homes constructed on reinforced concrete slabs on Bay Mud site.

Santa Clarita General Mail Facility - Expert witness for HK Systems Inc. and Popham Haik Schnobrich & Kaufman on claim related to damage sustained in the Northridge Earthquake.

The Greens Condominiums, Simi Valley, California - Expert witness for defendants Earth Systems Consultants and Ritchey, Fisher, Whitman & Klein relative to opposing views regarding evaluation of slope stability.

The BoardWalk, Redwood Shores - Consultant to Edward Margason and Berding & Weil on differential settlement of town homes constructed on post-tensioned concrete slabs on Bay Mud site.

Plum Island, Foster City - Consultant / expert witness in suits involving settlement, corrosion, cracking and seismic resistance of reinforced concrete slabs supporting town homes - for Law Offices of Nick T. Reckas.

Rancho Solano, Solano County - Consultant to Edward Marguson and Tarkington, O'Connor & O'Neill and defendants on evaluation of slope stability in residential subdivision.

Twelker Residence, San Jose - Consultant / expert witness for defendant Gill properties and Herr & Zappala on dispute involving slope stability.

Connor Property, Castro Valley, Alameda County – Expert witness for defendant Henry Justiniano and McNichols, Randick, O'Dea & Tooliatos on dispute involving a three-foot high retaining wall!

Kate Valley Landfill, Canterbury, New Zealand – Expert witness on static and seismic slope stability issues in dispute before the Environment Court of New Zealand.

Loukas Property, Alamo, Contra Costa County – Expert witness for the Law Offices of Simon Kisch on inverse condemnation claim against Caltrans resulting from a landslide.

Skoumbas Property, Orinda, Contra Costa County – Expert witness for Law Offices of Nick T. Reckas on inverse condemnation claim against the City of Orinda resulting from improper discharge of storm drainage and consequent erosion.