

ELLEN JASEG



Cave-in at Echo Park Site Kills Construction Worker

A 30-year-old construction worker was killed Wednesday when he was buried by a cave-in at a construction site in Echo Park. Jesus Flores of El Monte was helping to dig foundations for an apartment house at 1416 W. Sunset Blvd. when part of a hillside caved in on top of him, said Los Angeles Fire Department spokesman Jim Williamson. Flores was knocked face down and buried under more than two feet of earth. Fellow workers tried feverishly to clear Flores' face. Paramedics, above, who arrived a few minutes later, helped to clear the earth away to chest level and tried to revive him without success. Fellow worker Eddie Perla, left, was there when Flores died. "I thought he'd made it because he was beating at the dirt," Perla said. The district attorney's office and the California Occupational Safety and Health Administration are investigating.



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May 15, 1989

Richard Meehan
 701 Welch Road, Suite 1120
 Palo Alto, California 94304

RE: SUBJECT AREAS FOR TESTIMONY

Dear Dick:

The following are areas we will cover in your direct testimony on May 24, 1989.

1. Background and training.
2. Definitions and difference between a soils engineer, geo-technical engineer, and geologist.
3. Definitions and descriptions of:
 - a. Bedding planes;
 - b. Dips and strikes;
 - c. Borings;
 - d. Bedrock and top soil;
 - e. Shear tests;
 - f. and significance of presence of water.

Involvement with 1411 West Sunset:

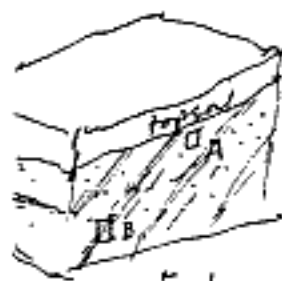
- a. Documents reviewed;
 - b. Visit to site and vicinity: Description (use of pictures); and
 - c. Discussion of geologic map of the area. (I have a copy of the California Division of Mines and Geology Report and map for the Elysian Park - Repetto Hills area.)
5. Standard procedure for soils work on property such as 1411 W. Sunset:
- a. Borings - Size and placement;
 - b. Preparation of a report;
 - c. On site observations;
 - d. Standard practice re use of a geologist when bedding planes are present.

Review of deficiencies in the original and supplemental soils report:

- a. Original calculations re strength of soil (700 v 300 psi);
- b. Reliance on presence of sandstone bedrock for calculations when borings show silty, siliceous shale.

7. Hypothetical:

- a. Calculation unshored vertical cut in hilly area would stand to 23 1/2 feet.



fractures -

4. Ifu Tested "A" type sample
 "B" type sample
 - low/no cohesion past stream
 - much time, not IS

Assessment
 - wide spread
 - theory

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Mr. Meehan
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- b. Observation by employee with training in geology (a few units short of a B. S.) that bedding planes dipping south are present.
- c. Visit to site after all or almost all of excavation, including a 14 16 foot vertical cut is made.
- d. Prepared soils report for property at 1316 West Sunset, to which is attached a geology report showing south dipping bedding planes.
- e. Access to & sometimes refers to geologic maps for the area.
- f. Opinion as to whether is an extreme departure from the standard of care not to take some action?
- g. What should soils engineer in that position do?

I will talk to you the afternoon of May 22.

Very truly yours,

Jan
JAN CHATTEN-BROWN
Special Assistant to the District Attorney
Environmental Crimes/OSHA Division

jw

From report of ...