



Little Akaloa Clubrooms
BU 3590-003 EQ2
Detailed Engineering Evaluation
Quantitative Report

Christchurch City Council



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Little Akaloa Clubrooms

Detailed Engineering Evaluation Quantitative Report

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Little Akaloa Clubrooms Building
BU 3590-003 EQ2

Detailed Engineering Evaluation
Quantitative Report - SUMMARY
Final – Version Two

Little Akaloa, Banks Peninsula

Background

This is a summary of the quantitative report for the building structure, and is based on the Detailed Engineering Evaluation Procedure document (draft) issued by the Structural Advisory Group on 19 July 2011, visual inspections on 18 January 2012, available drawings and calculations.

Key Damage Observed

Key damage observed includes:-

- Collapse of the top section of the chimney on the west side of the building.

Critical Structural Weaknesses

The following potential critical structural weaknesses have been identified.

- Lack of subfloor bracing (<34%NBS)

Indicative Building Strength

Based on the information available, and from undertaking a quantitative assessment, the building's original capacity has been assessed to be less than 34%NBS along the building and across the building, limited by the subfloor bracing. The building's post-earthquake capacity excluding critical structural weaknesses is in the order of 58%NBS along the building and 63%NBS across the building.

The building has been assessed to have a seismic capacity less than 34% NBS and is therefore earthquake prone. Failure of the piles would, in the worst case, result in the building dropping around 300mm to the ground level. It is expected that the building superstructure would remain intact and not collapse.

Recommendations

It is recommended that:

- a) A strengthening scheme be developed to increase the overall capacity of the building to 67%NBS.

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1 Introduction

Opus International Consultants Limited has been engaged by Christchurch City Council (CCC) to undertake a detailed seismic assessment of the Little Akaloa Clubroom building, located at Little Akaloa, Banks Peninsula following the M6.3 Christchurch earthquake on 22 February 2011.

The purpose of the assessment is to determine if the building is classed as being earthquake prone in accordance with the Building Act 2004.

The seismic assessment and reporting have been undertaken based on the qualitative and quantitative procedures detailed in the Detailed Engineering Evaluation Procedure (DEEP) document (draft) issued by the Structural Engineering Society (SESOC) on 19 July 2011.

2 Compliance

This section contains a brief summary of the requirements of the various statutes and authorities that control activities in relation to buildings in Christchurch at present.

2.1 Canterbury Earthquake Recovery Authority (CERA)

CERA was established on 28 March 2011 to take control of the recovery of Christchurch using powers established by the Canterbury Earthquake Recovery Act enacted on 18 April 2011. This act gives the Chief Executive Officer of CERA wide powers in relation to building safety, demolition and repair. Two relevant sections are:

Section 38 – Works

This section outlines a process in which the chief executive can give notice that a building is to be demolished and if the owner does not carry out the demolition, the chief executive can commission the demolition and recover the costs from the owner or by placing a charge on the owners' land.

Section 51 – Requiring Structural Survey

This section enables the chief executive to require a building owner, insurer or mortgagee to carry out a full structural survey before the building is re-occupied.

We understand that CERA require a detailed engineering evaluation to be carried out for all buildings (other than those exempt from the Earthquake Prone Building definition in the Building Act). CERA have adopted the Detailed Engineering Evaluation Procedure (DEEP) document (draft) issued by the Structural Engineering Society (SESOC) on 19 July 2011. This document sets out a methodology for both initial qualitative and detailed quantitative assessments.

It is anticipated that a number of factors, including the following, will determine the extent of evaluation and strengthening level required:

1. The importance level and occupancy of the building.

2. The placard status and amount of damage.
3. The age and structural type of the building.
4. Consideration of any critical structural weaknesses.

Any building with a capacity of less than 34% of new building standard (including consideration of critical structural weaknesses) will need to be strengthened to a target of 67% as required by the CCC Earthquake Prone Building Policy.

2.2 Building Act

Several sections of the Building Act are relevant when considering structural requirements:

Section 112 - Alterations

This section requires that an existing building complies with the relevant sections of the Building Code to at least the extent that it did prior to the alteration.

This effectively means that a building cannot be weakened as a result of an alteration (including partial demolition).

Section 115 – Change of Use

This section requires that the territorial authority (in this case Christchurch City Council (CCC)) is satisfied that the building with a new use complies with the relevant sections of the Building Code 'as near as is reasonably practicable'.

This is typically interpreted by CCC as being 67% of the strength of an equivalent new building. This is also the minimum level recommended by the New Zealand Society for Earthquake Engineering (NZSEE).

Section 121 – Dangerous Buildings

This section was extended by the Canterbury Earthquake (Building Act) Order 2010, and defines a building as dangerous if:

1. In the ordinary course of events (excluding the occurrence of an earthquake), the building is likely to cause injury or death or damage to other property; or
2. In the event of fire, injury or death to any persons in the building or on other property is likely because of fire hazard or the occupancy of the building; or
3. There is a risk that the building could collapse or otherwise cause injury or death as a result of earthquake shaking that is less than a 'moderate earthquake' (refer to Section 122 below); or
4. There is a risk that other property could collapse or otherwise cause injury or death; or
5. A territorial authority has not been able to undertake an inspection to determine whether the building is dangerous.

Section 122 – Earthquake Prone Buildings

This section defines a building as earthquake prone (EPB) if its ultimate capacity would be exceeded in a 'moderate earthquake' and it would be likely to collapse causing injury or death, or damage to other property.

A moderate earthquake is defined by the building regulations as one that would generate loads 33% of those used to design an equivalent new building.

Section 124 – Powers of Territorial Authorities

This section gives the territorial authority the power to require strengthening work within specified timeframes or to close and prevent occupancy to any building defined as dangerous or earthquake prone.

Section 131 – Earthquake Prone Building Policy

This section requires the territorial authority to adopt a specific policy for earthquake prone, dangerous and insanitary buildings.

2.3 Christchurch City Council Policy

Christchurch City Council adopted their Earthquake Prone, Dangerous and Insanitary Building Policy in 2006. This policy was amended immediately following the Darfield Earthquake on 4 September 2010.

The 2010 amendment includes the following:

1. A process for identifying, categorising and prioritising Earthquake Prone Buildings, commencing on 1 July 2012;
2. A strengthening target level of 67% of a new building for buildings that are Earthquake Prone;
3. A timeframe of 15-30 years for Earthquake Prone Buildings to be strengthened; and,
4. Repair works for buildings damaged by earthquakes will be required to comply with the above.

The council has stated their willingness to consider retrofit proposals on a case by case basis, considering the economic impact of such a retrofit.

If strengthening works are undertaken, a building consent will be required. A requirement of the consent will require upgrade of the building to comply 'as near as is reasonably practicable' with:

- The accessibility requirements of the Building Code.
- The fire requirements of the Building Code. This is likely to require a fire report to be submitted with the building consent application.

2.4 Building Code

The Building Code outlines performance standards for buildings and the Building Act requires that all new buildings comply with this code. Compliance Documents published by The Department of Building and Housing can be used to demonstrate compliance with the Building Code.

On 19 May 2011, Compliance Document B1: Structure was amended to include increased seismic design requirements for Canterbury as follows:

- 36% increase in the basic seismic design load for Christchurch (Z factor increased from 0.22 to 0.3);
- Increased serviceability requirements.

2.5 Institution of Professional Engineers New Zealand (IPENZ) Code of Ethics

One of the core ethical values of professional engineers in New Zealand is the protection of life and safeguarding of people. The IPENZ Code of Ethics requires that:

Members shall recognise the need to protect life and to safeguard people, and in their engineering activities shall act to address this need.

- 1.1 *Giving Priority to the safety and well-being of the community and having regard to this principle in assessing obligations to clients, employers and colleagues.*
- 1.2 *Ensuring that responsible steps are taken to minimise the risk of loss of life, injury or suffering which may result from your engineering activities, either directly or indirectly.*

All recommendations on building occupancy and access must be made with these fundamental obligations in mind.

3 Earthquake Resistance Standards

For this assessment, the building's earthquake resistance is compared with the current New Zealand Building Code requirements for a new building constructed on the site. This is expressed as a percentage of new building standard (%NBS). The loadings are in accordance with the current earthquake loading standard NZS1170.5 [1].

A generally accepted classification of earthquake risk for existing buildings in terms of %NBS that has been proposed by the NZSEE 2006 [2] is presented in Figure 1 below.

Description	Grade	Risk	%NBS	Existing Building Structural Performance	Improvement of Structural Performance	
					Legal Requirement	NZSEE Recommendation
Low Risk Building	A or B	Low	Above 67	Acceptable (improvement may be desirable)	The Building Act sets no required level of structural improvement (unless change in use) This is for each TA to decide. Improvement is not limited to 34%NBS.	100%NBS desirable. Improvement should achieve at least 67%NBS
Moderate Risk Building	B or C	Moderate	34 to 66	Acceptable legally. Improvement recommended		Not recommended. Acceptable only in exceptional circumstances
High Risk Building	D or E	High	33 or lower	Unacceptable (Improvement required under Act)	Unacceptable	Unacceptable

Figure 1: NZSEE Risk Classifications Extracted from table 2.2 of the NZSEE 2006 AISPBE Guidelines

Table 1 below compares the percentage NBS to the relative risk of the building failing in a seismic event with a 10% risk of exceedance in 50 years (i.e. 0.2% in the next year). It is noted that the current seismic risk in Christchurch results in a 6% risk of exceedance in the next year.

Table 1: %NBS compared to relative risk of failure

Percentage of New Building Standard (%NBS)	Relative Risk (Approximate)
>100	<1 time
80-100	1-2 times
67-80	2-5 times
33-67	5-10 times
20-33	10-25 times
<20	>25 times

3.1 Minimum and Recommended Standards

Based on governing policy and recent observations, Opus makes the following general recommendations:

3.1.1 Occupancy

- The Canterbury Earthquake Order¹ in Council 16 September 2010, modified the meaning of “dangerous building” to include buildings that were identified as being

¹ This Order only applies to buildings within the Christchurch City, Selwyn District and Waimakariri District Councils authority

EPB's. As a result of this, we would expect such a building would be issued with a Section 124 notice, by the Territorial Authority, or CERA acting on their behalf, once they are made aware of our assessment. Based on information received from CERA to date, this notice is likely to prohibit occupancy of the building (or parts thereof), until its seismic capacity is improved to the point that it is no longer considered an EPB.

3.1.2 Cordoning

- Where there is an overhead falling hazard, or potential collapse hazard of the building, the areas of concern should be cordoned off in accordance with current CERA/Christchurch City Council guidelines.

3.1.3 Strengthening

- Industry guidelines (NZSEE 2006 [2]) strongly recommend that every effort be made to achieve improvement to at least 67%NBS. A strengthening solution to anything less than 67%NBS would not provide an adequate reduction to the level of risk.
- It should be noted that full compliance with the current building code requires building strength of 100%NBS.

3.1.4 Our Ethical Obligation

- In accordance with the IPENZ code of ethics, we have a duty of care to the public. This obligation requires us to identify and inform CERA of potentially dangerous buildings; this would include earthquake prone buildings.

4 Building Description

4.1 General

The Little Akaloa Clubroom building is a single storey timber framed structure with timber weatherboard cladding and lightweight corrugated iron roof. The building sits on square concrete pile foundations with a low ground clearance.

The building is situated on a section with a gradual slope and is situated adjacent to two tennis courts and the Little Akaloa Community Hall. The land slopes gradually from the hills in the south down to the road at the north of the section. The building is approximately 6.8m long in the north-south direction and 4.9m wide in the east-west direction. The building consists of one tongue and groove lined room with tongue and groove flooring and a chimney on the western side of the building. The apex of the roof is approximately 3.6m above the ground and the building has a wall stud height of approximately 2.4m.

The building age is unknown, but is expected to have been constructed in the 1920's.

4.2 Gravity Load Resisting System

The roof is a timber framed roof with exposed rafters, timber sarking and lightweight corrugated cladding.

The walls are timber framed with a stud height of approximately 2.4m, stud size of 100mm x 50mm and stud spacing of 600mm (assumed).

The subfloor consists of tongue and groove flooring on suspended timber framing which sits on square concrete pile foundations. The spacing between the ground level and the top of the piles is around 300mm.

4.3 Seismic Load Resisting System

Lateral support for the roof is provided through its hip roof design and timber sarking.

The main lateral support for the building is provided by the tongue and groove wall lining to the exterior walls.

No subfloor bracing appears to have been installed.

5 Survey

Copies of the following drawings were referred to as part of the assessment:

- One architectural sketch of the building completed by Opus Architecture titled “Little Akaloa Club Rooms, floor plan and section”.

No copies of the design calculations or structural drawings have been obtained for this building.

The drawings have been used to confirm the structural systems, investigate potential critical structural weaknesses (CSW) wherever possible and identify details which required particular attention

6 Damage Assessment

The building shows a lot of damage to the external cladding due to a lack of maintenance, however appears to have suffered only minor damage as a result of the recent earthquake events. The following damage has been noted:

6.1 Collapsed chimney

The top section of the chimney has collapsed above the gutter and is now lying on the ground adjacent to the building.

7 General Observations

Overall the building has performed well under seismic conditions which would be expected for a timber framed single storey structure. The building has sustained little damage and continues to be fully operational.

Due to the non-intrusive nature of the original survey, many connection details could not be ascertained.

8 Detailed Seismic Assessment

8.1 Critical Structural Weaknesses

As outlined in the Critical Structural Weakness and Collapse Hazards draft briefing document, issued by the Structural Engineering Society (SESOC) on 7 May 2011, the term 'Critical Structural Weakness' (CSW) refers to a component of a building that could contribute to increased levels of damage or cause premature collapse of the building.

We have identified the following potential critical structural weaknesses in the building

- a) There does not appear to be any form of subfloor bracing provided.

8.2 Seismic Coefficient Parameters

The seismic design parameters based on current design requirements from NZS1170.5:2004 and the NZBC clause B1 for this building are:

- Site soil class D, clause 3.1.3 NZS 1170.5:2004
- Site hazard factor, $Z=0.3$, B1/VM1 clause 2.2.14B
- Return period factor $R_u = 1.0$ from Table 3.5, NZS 1170.5:2004, for an Importance Level 2 structure with a 50 year design life.
- Ductility factor $\mu_{max} = 1.25$ for the timber-framed building.

8.3 Detailed Seismic Assessment Results

A summary of the structural performance of the building is shown in the following table. Note that the values given represent the worst performing elements in the building, as these effectively define the building's capacity. Other elements within the building may have significantly greater capacity when compared with the governing element.

Table 2: Summary of Seismic Performance

Structural Element/System	Failure mode and description of limiting criteria	Critical Structural Weakness and Collapse Hazard	% NBS based on calculated capacity
Walls in the east west direction i.e. across the building	Bracing capacity of the wall linings along the building	No	63%
Walls in the north south direction i.e. along the building	Bracing capacity of the wall linings across the building	No	58%
Roof diaphragm	Capacity of the roof plane sarking.	No	>100%
Pile foundations	Subfloor bracing capacity of the concrete pile foundations	Yes	<34%

8.4 Discussion of Results

The building has a calculated capacity of less than 34% NBS as limited by the subfloor bracing capacity of the concrete piles.

Failure of these piles would, in the worst case, result in the building dropping around 300mm to the ground level. It is expected that the building superstructure would remain intact and not collapse.

8.5 Limitations and Assumptions in Results

Our analysis and assessment is based on an assessment of the building in its undamaged state. Therefore the current capacity of the building will be lower than that stated.

The results have been reported as a %NBS and the stated value is that obtained from our analysis and assessment. Despite the use of best national and international practice in this analysis and assessment, this value contains uncertainty due to the many assumptions and simplifications which are made during the assessment. These include:

- Simplifications made in the analysis, including boundary conditions such as foundation fixity;
- Assessments of material strengths based on limited drawings, specifications and site inspections;
- The normal variation in material properties which change from batch to batch;
- Approximations made in the assessment of the capacity of each element, especially when considering the post-yield behaviour.

9 Geotechnical Assessment

9.1 Regional Geology

The published geological map of the area, (Geology of the Christchurch Area 1:250,000, Forsyth, Barrell and Jongens, 2008) indicates the site is located on grey to brown alluvium, comprising of silty sub-angular gravel and sand forming alluvial fans.

9.2 Peak Ground Acceleration

Interpolation of United States Geological Survey (USGS) Shakemap: South Island of New Zealand (22 Feb, 2011) indicates that this location has likely experienced a Horizontal Peak Ground Acceleration (PGA) of approximately 0.05g to 0.15g during the 22nd February 2011 Earthquake. Estimated PGA's have been cross checked with Geonets' Modified Mercalli intensity scale observations.

9.3 Expected Ground Conditions

No relevant site investigation data is available from Environment Canterbury database in the vicinity of this building.

9.4 Site Observations

The building was inspected by Opus Structural Engineers on the 18th January 2012. The following observations were made from site notes and photographs.

- The building is located 200m west of the beach on gentle sloping land.
- A tennis court has been cut into the slope approximately 5m west of the building. This appears to be undamaged.
- A manmade swale/drain is located down the west side of the Club Rooms and along the tennis court to the road.
- Google Earth images suggest that there may be a water run-off channel down the hill to the south of the building.
- Top section of the chimney has fallen off.
- The concrete footpath surrounding the building falls toward the road (north), following the natural topography with minimal cracking.
- The timber power pole on the north west corner of the hall is not vertical.

9.5 Conclusions and Discussion

The current foundations of this building are not visible, but the building does not appear to have suffered from differential settlement or lateral movement, therefore it could be assumed that the current foundations are adequate. The paved tennis courts and the surrounding cantilever block wall appear to be in good condition, indicating that no ground

deformation has occurred. The pavement between the Community Hall and Clubrooms does not appear to have settled due to the earthquakes and has likely to have been constructed this way to aid in surface water run-off. The swale/drain to the west of the building is less than 0.5m deep; therefore it is considered that there is a low risk of lateral spreading at this site. Based on site observations, no further geotechnical investigations are recommended.

10 Remedial Options

Any remedial options for increasing the seismic capacity above 67% NBS would need to address the bracing capacity of the wall linings and the subfloor bracing capacity in both directions.

11 Conclusions

- (a) The building has a seismic capacity of less than 34% NBS and is therefore classed as earthquake prone.
- (b) Due to the calculated capacity the building is classed as grade D, high risk and has a relative risk of failure of approximately 25 times that of building complying with current codes.
- (c) The seismic capacity is governed by the lack of bracing to the subfloor structure. Failure of the piles would, in the worst case, result in the building dropping around 300mm to the ground level. It is expected that the building superstructure would remain intact and not collapse.
- (d) The existing brick chimney has collapsed above the roof gutter level. A new compliant chimney could be constructed if required.

12 Recommendations

- (a) Strengthening options be developed for increasing the seismic capacity of the building to at least 67% NBS.
- (b) Options be developed for existing chimney repair, demolition or replacement.

13 Limitations

- (a) This report is based on an inspection of the structure with a focus on the damage sustained from the 22 February 2011 Canterbury Earthquake and aftershocks only. Some non-structural damage is mentioned but this is not intended to be a comprehensive list of non-structural items.
- (b) Our professional services are performed using a degree of care and skill normally exercised, under similar circumstances, by reputable consultants practicing in this field at the time.

- (c) This report is prepared for the CCC to assist with assessing remedial works required for council buildings and facilities. It is not intended for any other party or purpose.

Appendix A – Photographs



Photo 1: Eastern perimeter wall



Photo 2: Northern perimeter wall



Photo 3: View toward the north west corner of the building with community hall in the background



Photo 4: West perimeter wall



Photo 5: View of the concrete pile at the north west corner of the building



Photo 6: View of the subfloor



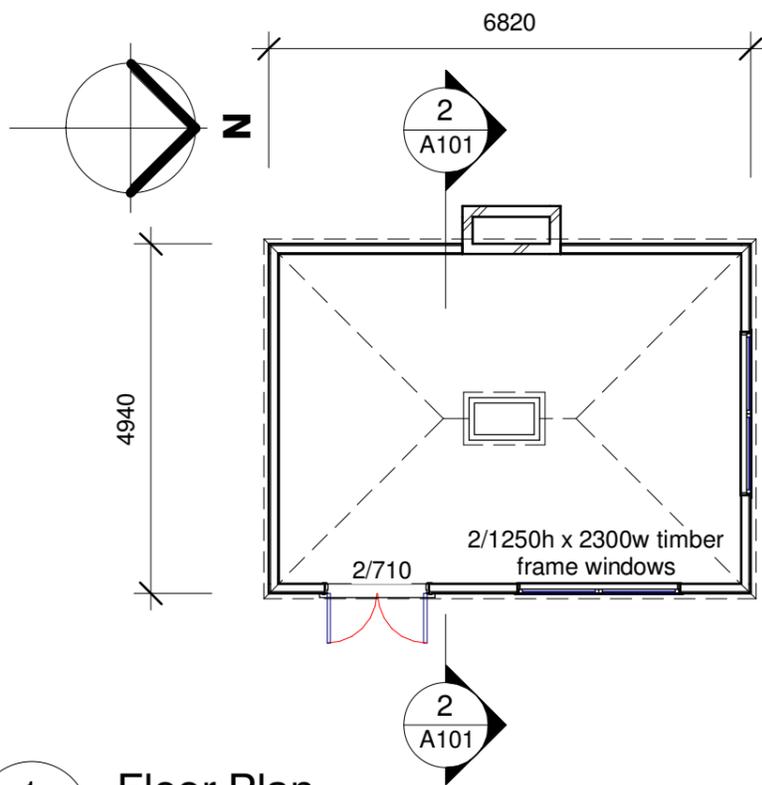
Photo 7: View toward the interior of the south wall



Photo 8: View toward the interior of the west wall

Appendix B – Floor Plan

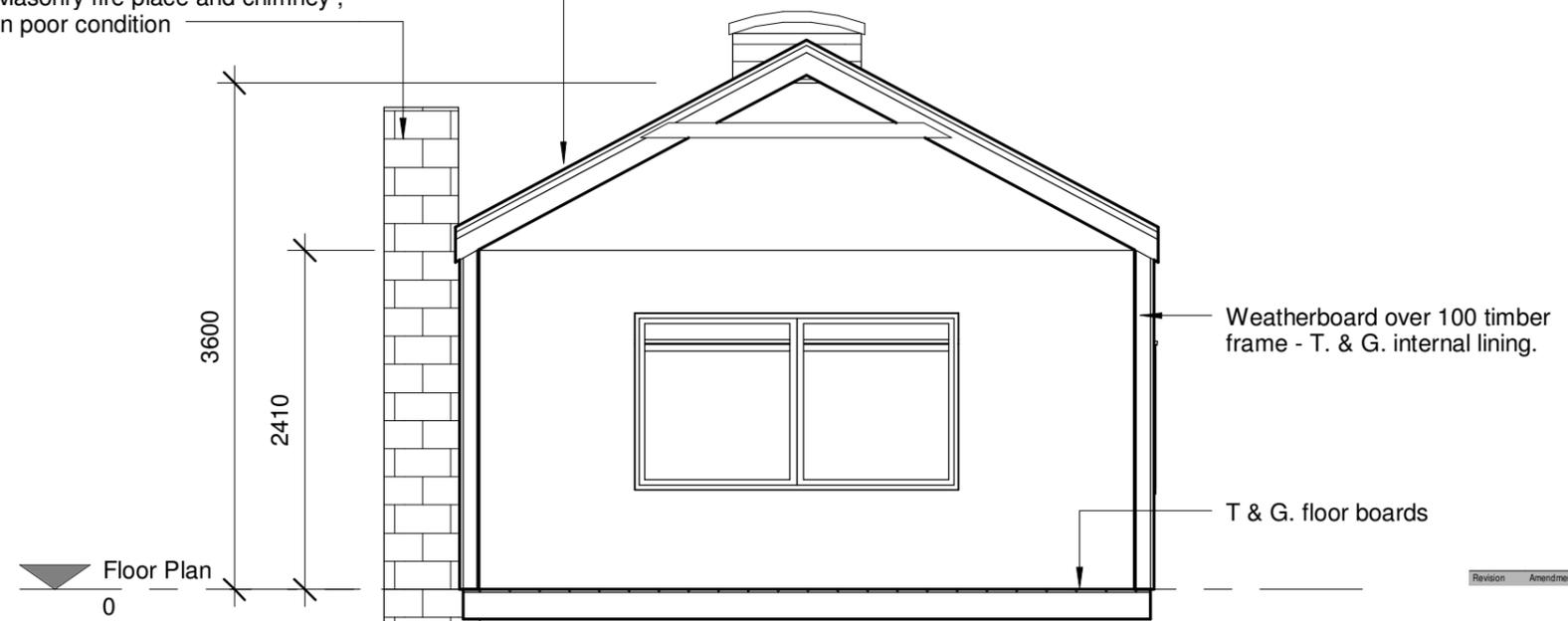
150mm
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1 Floor Plan
A101 1 : 100

Corrugated roof sheet over timber framing - Roof pitch 28°

Masonry fire place and chimney , In poor condition



2 Section 1
A101 1 : 50



Revision	Amendment	Approved	Revision Date

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Drawn	Designed	Approved	Revision Date
HF	HF	AH	30.03.12

Project No. _____ Scale _____

As indicated

Project
CHRISTCHURCH CITY COUNCIL
LITTLE AKALOA CLUB ROOMS
Title
FLOOR PLAN & SECTION

Drawing No.	Sheet No.	Revision
	A101	RA

Draft

Appendix C – CERA DEE Spreadsheet

Location		Building Name: Little Akaloa Clubrooms	Reviewer: Alistair Boyce
Building Address: 584 Little Akaloa Road	Unit No: Street	CPEng No: 209860	Company: Opus International Consultants
Legal Description:		Company project number: 6-QUCCC.72	Company phone number: 3635400
GPS south: 43 40 32.00	Degrees Min Sec	Date of submission: 17/02/2014	Inspection Date: 20/01/2012
GPS east: 172 59 22.00		Revision: Final V2	Is there a full report with this summary? yes
Building Unique Identifier (CCC): BU 3590-003 EQ2			

Site	Site slope: slope < 1 in 10	Max retaining height (m): 0
	Soil type: silty sand	Soil Profile (if available):
	Site Class (to NZS1170.5): D	If Ground improvement on site, describe:
	Proximity to waterway (m, if <100m):	Approx site elevation (m): 5.00
	Proximity to cliff top (m, if < 100m):	
	Proximity to cliff base (m, if <100m):	

Building	No. of storeys above ground: 1	single storey = 1	Ground floor elevation (Absolute) (m): 5.00
	Ground floor split? no		Ground floor elevation above ground (m): 0.30
	Storeys below ground: 0		if Foundation type is other, describe: Square concrete piles
	Foundation type: other (describe)	height from ground to level of uppermost seismic mass (for IEP only) (m):	Date of design: Pre 1935
	Building height (m): 3.60		
	Floor footprint area (approx): 34		
	Age of Building (years): 80		
	Strengthening present? no	If so, when (year)?	And what load level (%g)?
	Use (ground floor): public	Brief strengthening description:	
	Use (upper floors):		
	Use notes (if required):		
	Importance level (to NZS1170.5): IL2		

Gravity Structure	Gravity System: load bearing walls	rafter type, purlin type and cladding: Corrugated iron cladding
	Roof: timber framed	joist depth and spacing (mm):
	Floors: timber	type:
	Beams: timber	typical dimensions (mm x mm):
	Columns: timber	
	Walls:	

Lateral load resisting structure	Lateral system along: lightweight timber framed walls	Note: Define along and across in detailed report!	note typical wall length (m): 1m - 5m
	Ductility assumed, μ: 1.25	0.00	estimate or calculation? estimated
	Period along: 0.40		estimate or calculation?
	Total deflection (ULS) (mm):		estimate or calculation?
	maximum interstorey deflection (ULS) (mm):		
	Lateral system across: lightweight timber framed walls	0.00	note typical wall length (m):
	Ductility assumed, μ: 1.25		estimate or calculation?
	Period across: 0.40		estimate or calculation?
	Total deflection (ULS) (mm):		estimate or calculation?
	maximum interstorey deflection (ULS) (mm):		

Separations:	north (mm):	leave blank if not relevant
	east (mm):	
	south (mm):	
	west (mm):	

Non-structural elements	Stairs:	describe:
	Wall cladding: other light	Timber weatherboard
	Roof Cladding: Metal	describe:
	Glazing: timber frames	Corrugated iron
	Ceilings: none	
	Services(list):	

Available documentation	Architectural: partial	original designer name/date: Sketch drawn from January 2012 site visit
	Structural: none	original designer name/date:
	Mechanical: none	original designer name/date:
	Electrical: none	original designer name/date:
	Geotech report: none	original designer name/date:

Damage Site: (refer DEE Table 4-2)	Site performance:	Describe damage:
	Settlement: none observed	notes (if applicable):
	Differential settlement: none observed	notes (if applicable):
	Liquefaction: none apparent	notes (if applicable):
	Lateral Spread: none apparent	notes (if applicable):
	Differential lateral spread: none apparent	notes (if applicable):
	Ground cracks: none apparent	notes (if applicable):
	Damage to area: none apparent	notes (if applicable):

Building:	Current Placard Status: green	
Along	Damage ratio: 0%	Describe how damage ratio arrived at:
	Describe (summary):	
Across	Damage ratio: 0%	$Damage_Ratio = \frac{(\%NBS\ (before) - \%NBS\ (after))}{\%NBS\ (before)}$
	Describe (summary):	
Diaphragms	Damage?: no	Describe:
CSWs:	Damage?: yes	Describe: Lack of subfloor bracing
Pounding:	Damage?: no	Describe:
Non-structural:	Damage?: no	Describe:

Recommendations	Level of repair/strengthening required: minor structural	Describe:
	Building Consent required: yes	Describe:
	Interim occupancy recommendations: do not occupy	Describe: CCC to review occupancy
Along	Assessed %NBS before: 33%	#### %NBS from IEP below
	Assessed %NBS after: 33%	If IEP not used, please detail assessment methodology: Quantitative
Across	Assessed %NBS before: 33%	#### %NBS from IEP below
	Assessed %NBS after: 33%	

