

1 tree in question, and is tree number twenty-one in the report provided to the Camp. (Attached
2 hereto as Exhibit E, is a true and correct copy of the report provided to the Camp, dated July 18,
3 2010.) The tree was healthy, except for one dead limb on it that I recommended the Camp remove.
4 Otherwise, the tree did not show signs or indications of potential for failure. The tree had robust
5 foliage growing on it and its leaves looked healthy. In this report I also recommended that the
6 Camp monitor the trees every eighteen months.

7 13. While at the Camp I noticed that there were no signs present warning campers and staff
8 that the larger trees could break. I also observed that the area around the base of the tree had not
9 been excavated, as the root collar was not exposed and there were no signs of digging or disturbing
10 the soil. One other thing I saw while at the Camp in 2010 was that an oak near the basketball court
11 that I had recommended be removed was still there (this tree was identified as tree number 5 in my
12 prior report); although it appeared that at some point the Camp had moved a picnic table that had
13 been near this tree.

14 14. In April, 2011, I received an email from Adam Weisberg from Camp Tawonga, asking
15 for my thoughts on one of the Camp's trees that had recently failed. This came as a bit of a surprise
16 as it was the first time the Camp had initiated contact with me for any reason apart from requesting
17 that I come and inspect their trees. (Attached hereto as Exhibit F, is a true and correct copy of the
18 email from Adam Weisberg to me, dated April 4, 2011.) I explained in general terms how saturated
19 soil and heavy snow can affect trees, and also said that "such occurrences [tree failures] are part of
20 nature and no one is able to accurately predict all failures." (Attached hereto as Exhibit G, is a true
21 and correct copy of the email chain of communications between Adam Weisberg and me, dated
22 April 4, 2011.) In our emails back and forth, Mr. Weisberg stated that "For now, we'll plan on
23 having you back on the time table you recommended – every 18 months which means January
24 2012." (Please refer to Exhibit G, page 1.) I was expecting that the Camp would contact me and
25 arrange for me to come inspect their trees in January, 2012, as Mr. Weisberg stated he would, but I
26 never did receive any further communication from the Camp until June, 2013. (Attached hereto as
27 Exhibit H, is a true and correct copy of the email I received from Ken Kramarz, the then Executive
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18708 – DECLARATION OF DENICE F. BRITTON ISO MSJ