

1 A I don't remember that I signed up any of those
2 trees for trims, but I'd have to see the records to
3 verify that.

4 And when you say did I make any recommendations,
5 who are you referring to?

6 Q Anyone. Make a recommendation to PG&E? Did you
7 make a recommendation to anyone at ACRT, like your
8 supervisor? Did you make a recommendation to the Camp?
9 Anything.

10 A If I determined that a tree does not need to be
11 worked, then I'm not going to go back to my supervisor
12 or anyone else and say, "I think we need to work that
13 tree."

14 But I did talk to the manager at the Camp,
15 because he requested that I show him which trees I was
16 going to trim in the Camp. So we walked, and I showed
17 him the trees we were going to trim in the Camp, and we
18 discussed how much I was going to trim them, because he
19 was concerned which trees and how much. It was one of
20 those situations where a customer is requiring what we
21 call minimum trim. Take it, just taking the least
22 amount out of a tree to protect the power lines without
23 taking too much out of a tree. Worried about the
24 aesthetics of the tree.

25 Q Okay.

1 A And when I talked to him, when I was done showing
2 him the trees, and to the best of my memory I said
3 something to the effect of, "I have some concerns about
4 some of the trees in this area." Whether I said "this
5 area" or "the seating area," I said, "I have some
6 concerns about some of these trees."

7 And at that point he put up his hands and said,
8 "Stop. I have my trees checked every year by a private
9 arborist, we are fine." Something to that effect.

10 And I said, "Okay."

11 Q Did you tell him what the concerns were?

12 A I didn't pursue it at that point.

13 Q Okay. But you were concerned enough to talk to
14 him about it?

15 A Yes. I felt I had a moral obligation to say
16 something to him about it.

17 Q Is that because what you saw as a hazard to
18 people?

19 A Yes.

20 Q Did you ever speak with -- I got a lot of bad
21 questions this afternoon. That's another one.

22 Did the manager -- you call him a Camp manager?

23 A I think he was -- my impression was he was the
24 manager of the facility.

25 Q Okay. To your knowledge or understanding, did he

1 MS. BIENIEK: Join.

2 MR. LEE: Join.

3 THE WITNESS: Okay. So --

4 BY MR. KNOWLES:

5 Q Go ahead.

6 A What's the question exactly?

7 Q Well, let me ask it this way.

8 What tree or trees were responsible for the
9 concern that caused you to start talking to this
10 gentleman and saying, "I'm concerned about these trees"?

11 A And -- you know, trying to remember back as to
12 like which tree or trees, species and whatever, I don't
13 remember exactly. But I remember that there were some
14 very large trees in the area, and I didn't -- when I
15 take out my binoculars to inspect a tree, that's taking
16 it up a level of inspection. Okay.

17 Q Did you do that with these?

18 A Yes, I did.

19 Q Okay.

20 A Because I was concerned about crotches, and
21 attachments, and things like that. I found absolutely
22 no reason that I could justify to work those trees based
23 on GO 95 and all the other parameters that we work
24 under. But, I had concerns, and I felt I had a moral
25 obligation to say something to somebody at the Camp that

1 if that tree was in my backyard and my kid's swing set
2 was underneath there, that I wouldn't want the swing set
3 there. And, you know, depending on where the
4 conversation went or whatever, I would kind of express,
5 you know, what could be done and some ideas. But the
6 conversation never went there.

7 Q What was your intended statement going to be to
8 him about the trees had he let you go on?

9 MR. PRAY: Objection, calls for speculation.

10 MR. MALONE: Join.

11 MS. BIENIEK: Join.

12 MR. LEE: Join.

13 MR. CARR: Join.

14 THE WITNESS: Like I said, I would have expressed
15 concern that there's a large seating area with -- and
16 this is a children's camp -- and I wouldn't feel
17 comfortable that those trees being that near to that
18 seating area. But, I mean, I've worked in county parks,
19 and it's the exact same thing, and there's picnic
20 benches underneath them. And I never felt comfortable
21 with that either. So -- but I would, I would at least
22 tell him that.

23 BY MR. KNOWLES:

24 Q Okay. But you never got a chance to expand on
25 what you were --