

1	to your knowledge, does that mark the buffer zone boundaries?	2	Q. Your map is tiny, and I can't read it.
3	A. Your map is tiny, and I can't read it.	4	Q. Okay. Fair enough. It is tiny.
5	MS. WYATT-BULLMAN: Do you have a bigger	6	one?
6	MR. NEY: Not at the moment.	7	THE WITNESS: Right. That's what I'm
7	MS. WYATT-BULLMAN: Because there's a key.	8	trying to see.
8	Q. (By Mr. Ney) Do you recall an instance in	9	which the City has acquired private property that is
9	part of the area designated as Gun Club Landfill --	10	Baby Gun Club Landfill, rather?
10	Q. Have the boundaries of Baby Gun Club	11	A. You'll probably need to refer to the City
11	attorneys relating to that acquisition.	12	that You've been in your current position?
12	Q. Have the boundaries of Baby Gun Club	13	I. Landfill changed that You know of since the time
13	that You've been in your current position?	14	that You've been in your current position?
14	Q. Have the boundaries of Baby Gun Club	15	A. You'll probably need to refer to the City
15	attorneys relating to that acquisition.	16	Landfill changed that You know of since the time
16	Q. (By Mr. Ney) Do you recall an instance in	17	that You've been in your current position?
17	which the City has acquired private property that is	18	I. Landfill changed that You know of since the time
18	part of the area designated as Gun Club Landfill --	19	that You've been in your current position?
19	Q. Have the boundaries of Baby Gun Club	20	A. Have the boundaries changed? Well, Baby
20	attorneys relating to that acquisition.	21	Gun Club Landfill is really kind of, like,
21	Q. What does that mean?	22	hypothetical.
22	A. That means it's not a real name. Like	23	Q. What does that mean?
23	it's not a permitted Landfill.	24	A. That means it's not a real name. Like
24	it's not a permitted Landfill.	25	it's not a permitted Landfill.

1. Q. Okay.
2. A. It's just --
3. Q. It's an unpermitted dump site; is that correct?
4. A. I know it's not a separate permitted landfill called Baby Gun Club.
5. Q. It's an unpermitted dump site; is that correct?
6. A. I know it's not a separate permitted landfill called Baby Gun Club.
7. Q. Okay. What is it be -- well, as part of its post-closure care activities, has the City or the City's agents changed the topography of Baby Gun Club landfill by moving dirt, adding dirt?
8. A. To Baby Gun Club?
9. Q. Yes, ma'am.
10. A. No.
11. Q. Has that occurred with regard to Gun Club landfill?
12. A. Yes.
13. Q. And is that something that the City does,
14. A. Or is that something that an outside contractor would do?
15. Q. Is that something that an outside contractor or is that something that an outside contractor who would be the outside contractor who has performed those activities, if any, at any point within the past ten years?
16. A. Outside contractor.
17. Q. Who would be the outside contractor who has performed those activities, if any, at any point within the past ten years?
18. A. Ten years? CH2M Hill, Arcadis, and Weston.