



6. My own involvement in Docket 378 and activities relating to preparation to participate in the hearing on this docket included, but were not limited to: researching 422A farmland statutes and lease agreements with the Tanner family, and contacting the Department of Agriculture; reviewing previous documents related to the ATT application on Rabbit Hill Rd from 2002, subsequent town meetings and correspondence from town to that applicant and to the Siting Council from that time period; comparing that application and technical report to the minimal information provided by the applicant in Docket 378; discussions with the Attorney General's office; attending the Warren Town meeting; review of the Town of Washington and the Town of Warren telecom regulations; reviewing tax maps of the area, reviewing slope maps; telephone calls to Connecticut Light and Power, reviewing state listed species in the area and contacting the Connecticut DEP; obtaining DEP documentation of species of concern in the coverage area; locating and communicating with ornithologist John McNeely; conversations with members of Audubon, conversations with local artists and photographers and with neighbors on Rabbit Hill, communicating with biologist Elizabeth Corrigan; researching US Fish and Wildlife recommendations on towers, reviewing American Birding Conservancy's arguments in the case against the FCC, communicating with other state environmental groups concerned with the siting of a tower on state owned farmland, discussing these issues with our First Selectman and other officials of the town, including our own commission and commission chairman; reviewing the Town Plan of Conservation and Development and Natural Resource Inventory; viewing two balloon floats from various locations in town and photographing and printing those pictures, and one on site visit; researching, finding and copying maps; multiple close readings of the application and all other documents produced by the applicant; preparation of examination of the applicant; preparation of letters, including notice of intent to become a party; preparation of briefs and filings; personally multiple copying and filing and serving pre-filed testimony; personally multiple copying and filing and serving pre-filed exhibits; multiple trips to the post office; attendance of two sessions of the public hearing on Docket 378, a pre hearing conference and an additional subsequent public hearing on the docket;

7. I am a volunteer serving the public for six years on the Conservation Commission. My days are otherwise spent in gainful employment as an artist and art teacher. My business as a private art teacher has suffered dramatically since the application was made to the Siting Council in March. My evenings are also spent working as a portrait artist and on personal business and time with my daughter. I have lost months worth of time since this application hit the Siting Council and probably at least one hundred additional hours from the first letter to town in August of 2008

8. Having to defend the rights of the citizens of the Town of Washington and their interests through the Town's Conservation Commission was required the moment SBA began its municipal consultation period on the proposed Site A and has consumed time since the process began in the August of 2008. The municipal consultation period on Site B was defective and we had no idea of where site B was located until days before the

application went to the Siting Council, but we were also required to defend the Town's interests against that defective site while preparing for the hearing.

9. In order for the Town of Washington, its Conservation Commission and I as the Town's Cell Tower designee, to fulfill obligations to residents of the Town of Washington, we had to participate in this docket formally, and we had to prepare for and provide all formal filings in keeping with diligent defense of the Town's rights and interests.

10. I personally have spent well over three hundred hours since the end of February 2009, researching, writing and filing briefs, letters, pre-filed testimony, gathering and multiple copying exhibits in preparation for the public hearing, attending two lengthy formal hearing sessions, a pre trial conference and an additional Siting Council hearing on the docket, time spent in preparation for the hearings, including but not limited to preparing cross examination of the applicant, and preparing my own direct case. Expenditures of over \$1200, for which I have receipts, countless other expenses were incurred personally as I worked on this application from my home with my own supplies and resources and were not kept track of.

11. I spent days ignoring health problems and family demands in order to collect, copy and compile pre-filed exhibits, testimony and other documents to be timely filed and served in this Docket. Every weekend for months was consumed with research and documentation preparing for a hearing we had asked, and were denied, additional time to prepare for. This has been accomplished at great personal sacrifice of time and resources that would ordinarily have been devoted to family and my profession and students. I was unable to spend the last day with my canine companion of more than 13 years because I was attending the last hearing on this Docket before the applicant pulled their application.

12. I took time off from work to attend the hearing sessions and to prepare documents for formal filings; I turned down work in the month of May and June so that I could be available for the hearing, cancelling classes that earn \$1500 per session. I did not pursue my own portrait work in this time period, as I knew I would not have the time to complete any new commissions. Portraits prices begin at \$2000. I spent my own personal funds in order to defend the rights implicated by the SBA application.

13. These preparations include substantial expenditures as well as worry and concern that my efforts on behalf of my town should be effective and useful to my town and to its residents who have entrusted me with their interests.

14. I have been materially injured by having been required to defend the rights of my Town and Townspeople and myself, or risk waiving them.

Sworn to before me  
This 22th day of June, 2009

Diane Dupuis  
Diane Dupuis

Victoria M. Cherniske  
Notary Public

