Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead

Richard J. Bruckner
Director

April 21, 2010

TO: Wayne Rew, Chair
Pat Modugno, Vice-Chair
Esther L. Valadez, Commissioner
Leslie G. Bellamy, Commissioner
Harold V. Helsley, Commissioner

FROM: Mark Child
Zoning Permits 1 Section

SUBJECT: **PROJECT NUMBER- R2008-01980**
CONDITIONAL USE PERMIT – RCUP200800165
3418 Shoreheights Dr.

BACKGROUND

The Hearing Officer's determination was appealed to the Regional Planning Commission by the neighbors. On February 16, 2010 a conditional use permit was granted to authorize the applicant Omnipoint Communications the installation of a new wireless telecommunications facility in the public right-of-way (ROW).

REQUIRED ENTITLEMENTS

The CUP authorizes the construction, maintenance and installation of a new wireless telecommunications facility consisting of three (3) panel antennas, to be mounted on a 22'6" concrete textured octagonal pole within the public road right-of-way (ROW). The antennas will be enclosed by a 30" x 66" radom placed on the top of the pole. The overall height of the pole is 28' and the associated equipment will be placed in a vault across the street.

LOCATION

3418 Shoreheights Dr., in the community of Malibu in the Malibu Zoned District.

DISCUSSION

Since the hearing package was distributed Regional Planning has received Four letters of opposition from two separate citizens which are attached for your review.

MOTIONS

The following is a denial motion.

SUGGESTED DENIAL MOTION

I MOVE THAT THE REGIONAL PLANNING COMMISSION CLOSE THE PUBLIC HEARING AND DENY THE APPEAL AND UPHOLD THE HEARING OFFICER'S DECISION FOR PROJECT NUMBER R2008-01980 WITH ASSOCIATED CONDITIONAL USE PERMIT NO. RCUP200800125 WITH FINDINGS AND CONDITIONS.

Should you have any additional questions or comments prior to the hearing contact Daniel Fierros at (213) 974-6443, or by e-mail at DFierros@planning.lacounty.gov.

Attachments:
Opposition letters
Draft Findings of Approval
Draft Conditions

MC:DF
4/21/2010

Dundas I. Flaherty
3749 Malibu Vista Drive
Malibu, California 90265
Telephone (310) 454-0041 Fax (310) 454-5113
nonsolum@earthlink.net

8 April 2010

Attn: Hearing Officer
Project No. R2008-01980-(3)
Los Angeles County Regional Planning
320 West Temple Street
Los Angeles, CA 90012

Re: Project No. R2008-01980-(3)

Dear Hearing Officer:

Further to my letter to you dated 2 April 2010 regarding the referenced project, there's a new technology being rolled out by all the major US cell phone carriers that obsoletes the technology embodied in T-Mobile's proposed antenna installation on Shoreheights Dr.

The new technology is a femtocell, an in-home device connecting to broadband service in the home. Here we get good broadband service from Charter Cable for $30/month. Carriers provide cell service to the femtocell via broadband Internet. The femtocell serves multiple cell phones within the home. AT&T describes its femtocell offering at: http://www.wireless.att.com/learn/why/3gmicrocell/

Yesterday's *New York Times* had an article (hyperlink below) on femtocells suggesting that femtocell prices will fall to $49 from one carrier, that carriers may eventually give them away, and that the following numbers of femtocells will be shipped:

This year	571,000
2011	1.9 million
2013	40 Million

APR 12 2010

http://www.nytimes.com/2010/04/07/technology/07cell.html?scp=4&sq=richtel&st=cse

I understand that the Hearing Officer said at the first hearing that femtocells are too expensive and dismissed them as an alternative than the proposed tower for that reason. That view was probably wrong when expressed, and it's certainly wrong now. T-Mobile could give free femtocells at all 500 homes on our hill at its cost of perhaps $30 each for a total of $15,000, plainly less than the cell tower it proposes would cost, provide better service, and would spare us property value losses exceeding $1 million.

Please deny the CUP tentatively approved for the proposed tower. It is unnecessary with T-Mobile's advertised good-to-excellent current service, and it's technologically obsolete, with femtocell and other evolving technology offering better, cheaper service. Don't degrade our neighborhood and cause other problems described in my earlier letters to you by letting T-Mobile build out poor, obsolete technology when better solutions are at hand/imminently on the way.

Sincerely,

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4 April 2010

Attn: Hearing Officer
Project No. R2008-01980-(3)
Los Angeles County Regional Planning
320 West Temple Street
Los Angeles, CA 90012

Re: Project No. R2008-01980-(3)

Dear Hearing Officer:

Further to my letter to you dated 2 April 2010 regarding the referenced project, attached are two screenshots from T-Mobile's website.

The screenshots show T-Mobile's coverage in our area as:

For Voice Coverage: "Excellent," Very Good," and "Good."

For Data Coverage: "Fast Mobile Web," and "Mobile Web."

Both with zero uncovered area for voice or data.

Just to be entirely clear, the source of the screenshot information is T-Mobile itself. You may verify that at http://coverage.t-mobile.com/default.aspx.

The clear conclusion to be drawn from this information is that there's no problem with T-Mobile's voice and data coverage in our neighborhood, hence no need now for the cell tower proposed by T-Mobile. To the extent such a need develops, there is plenty of time to come up with A Better Plan as outlined in my letter to you dated 2 April 2010.

I again ask that you deny the referenced land use proposal to be heard on appeal on 21 April 2010 and to ask you to lead the way toward a better plan.

Thanks for listening.

Sincerely,

Dundas I. Flaherty

RECEIVED
APR - 6 2010

Personal Coverage Check

Check if T-Mobile coverage is right for you with Personal Coverage Check

Street
Intersection ex: Broadway and W 148th Street
City State Zip
search
clear

Voice Coverage | Data Coverage

Prepaid and FlexPay coverage map >

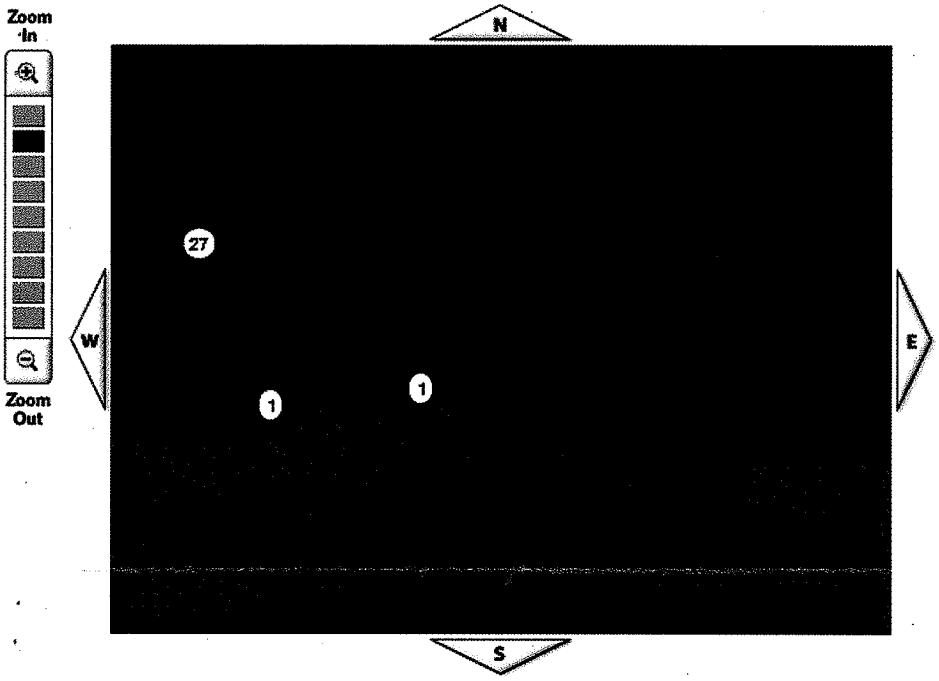
Learn more about T-Mobile's expanded coverage >

Network Speed

Very Fast Mobile Web | Fast Mobile Web | Mobile Web

Partner Web | None

Click here for detailed descriptions



Please zoom in to see street level coverage details for the areas where you live, work, and play.

Print

Map Legend

X Address Location
T-Mobile HotSpot Display
Roaming HotSpot (Additional charges apply)
Find a T-Mobile HotSpot ›

MAP INFORMATION: Maps approximate anticipated coverage outdoors, which varies by location, may include limited or no coverage areas, and do not guarantee service availability. Within coverage areas, network changes, traffic volume, outages, technical limitations, signal strength, your equipment, obstructions, weather and other conditions may interfere with service quality and availability. Portions of the maps include networks operated by our roaming partners; we are not responsible for their performance. 3G Coverage requires a 3G device. Devices not purchased from T-Mobile or an authorized dealer may not work on our network. T-Mobile to T-Mobile calls are directly dialed between T-Mobile devices while on the T-Mobile USA network (and not roaming in the US or internationally); voicemail and other T-Mobile service numbers not included. **Roaming:** Nationwide roaming refers to usage while on a roaming partner's network within coverage area; currently not available for webConnect™ data plans. International roaming incurs additional charges and refers to usage outside of the US. 850 Roaming Coverage requires a multi-band device. Certain devices and features will not work when roaming. Ask a sales representative or visit www.t-mobile.com/morecoverage for more information. If you travel outside of coverage areas, your device will not work.

Personal Coverage Check

Check if T-Mobile coverage is right for you with Personal Coverage Check

Street
Intersection ex: Broadway and W 148th Street
City State Zip
search
clear

Voice Coverage | Data Coverage

Prepaid and FlexPay coverage map >

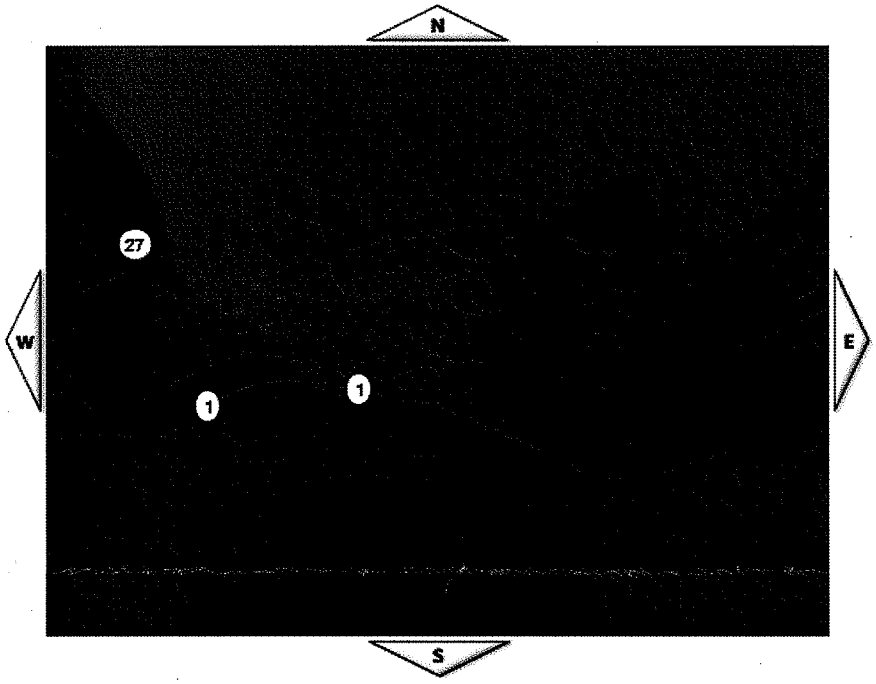
Learn more about T-Mobile's expanded coverage >

Signal Strength

Excellent	Very Good	Good
Moderate	Partner	None

Based on outdoor coverage - indoor and in-car coverage can vary.
Click here for detailed descriptions

Zoom In



Zoom Out

Please zoom in to see street level coverage details for the areas where you live, work, and play.

Print

Map Legend
X Address Location
T-Mobile HotSpot ☑ Display
Roaming HotSpot (Additional charges apply)
Find a T-Mobile HotSpot ›

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RECEIVED
APR - 5 2010

2 April 2010

Attn: Hearing Officer
Project No. R2008-01980-(3)
Los Angeles County Regional Planning
320 West Temple Street
Los Angeles, CA 90012

Re: Project No. R2008-01980-(3)

Dear Hearing Officer:

As instructed in your *Notice of Hearing* posted at the site of the proposed construction, I'm writing to ask that you deny the referenced land use proposal to be heard on appeal on 21 April 2010 and to ask you to lead the way toward a better plan.

I'll begin with the case for a better plan below, then identify problems with the proposal which I believe should lead to its denial. I'm presenting my views to you by (hard copy) letter per the *Notice of Hearing*. I'd be pleased to send you and others to whom I'll be sending copies of this letter the same letter and its exhibits in digital form; email me at nonsolum@earthlink.net and I'll promptly send you the letter with exhibits.

There are two advantages to having the letter in digital form. One is that certain sources are cited by Internet addresses; in digital form, the reader can use these addresses as hyperlinks to reach the source cited fast and without rekeying addresses. The second is that certain exhibits are very high resolution photographs of other actual/potential antenna sites; printed photos lack the richness of detail in digital images, which clearly show antennas already erected on what I believe are better sites than the one proposed.

Part I. A Better Plan

To the extent that there is a problem with cell phone and wireless coverage in our community of some 500 homes on the same hill as the Getty Villa Museum off Pacific Coast Highway at Coastline Drive, we are only a small part of poor cell/wireless coverage according to:

http://www.gotreception.com/

The website shows antenna locations and areas of coverage for the principal cell/wireless carriers. The website's local map shows no coverage in the coastal area from our community out to the County line and beyond, with minor exceptions.

A Better Plan would provide good cell/wireless coverage with consumer choice among carriers for the entire coastal area from Santa Monica to Oxnard and beyond. The terrain suggests siting antennas on high ground in this hilly/mountainous region. Best economics and consumer choice suggest that carriers share antenna sites.

Because some of the best locations appear to be on State Park land and some may be in the Coastal Zone, A Better Plan would call for interagency cooperation, and the result

would need to be consonant with the strictest environmental esthetics and protection. While the name "Regional Planning" implies such a role for your agency, my impression is that the bulk of your work is evaluating and granting permits for matters like the T-Mobile (hereinafter, "TM") proposal at hand, rather than actual planning of matters like cell phone coverage for regions like the County coastal area.

One action I ask you take is to refer our cell-phone coverage problem to an appropriate state-wide agency for leadership toward A Better Plan, putting the TM proposal on hold. I will write separately to others with copies of this letter, but I think we would get farther faster with your agency taking the initiative in its planning role by getting the right state agency to tackle the problem and building a team to develop A Better Plan.

Our cell-phone coverage problem is not novel. There are people and companies in industry who have dealt with similar problems elsewhere, that have expertise in their technology and where it's going, and that are capable of team play. For example, American Tower is a U. S. company that owns and operates cell and wireless antenna sites. Many of those sites are shared by multiple carriers. Revenues from leasing antenna sites/facilities to carriers exceeded $1.7 billion for 2009. Here are excerpts from the company's recent 10-K report:

> We are a leading wireless and broadcast communications infrastructure company that develops, owns, and operates communications sites, including wireless communications towers, broadcast communications towers and distributed antenna system ("DAS") networks. Our portfolio of wireless and broadcast towers consists of towers that we own and towers that we operate pursuant to long-term lease arrangements, including, as of December 31, 2009, approximately 20,000 towers in the United States and approximately 7,000 towers in Mexico, Brazil and India.
>
> Of the approximately 27,200 communications sites in our portfolio as of December 31, 2009, approximately 83% are located on land we do not own. Ground agreements for land underlying our towers generally have an initial term of five years with three or four additional automatic renewal periods of five years, for a total of twenty to twenty-five years.
>
> We believe the growth in the number of wireless service subscribers, the minutes of use per subscriber and the further adoption of wireless data applications by subscribers will require wireless carriers to add new cell sites and new equipment to existing cell sites to maintain the performance of their networks in the areas they currently cover and to extend service to areas where coverage does not yet exist.
>
> In addition, we believe that as the usage of wireless data applications, such as email, internet access and video, continues to grow on a widespread basis, wireless carriers may be compelled to further increase the cell density of their existing networks, deploy new technology and equipment, and expand their network coverage. To meet this demand, we believe wireless carriers will continue to outsource their communications site infrastructure needs as a means to accelerate access to their markets and more efficiently use their capital, rather than construct and operate their own communications sites and maintain their own communications site service and development capabilities.

The full 10-K is at:

http://phx.corporate-ir.net/phoenix.zhtml?c=98586&p=irol-SECText&TEXT=aHR0cDovL2NjYm4uMTBrd2l6YXJkLmNvbS94bWwvZmlsaW5nLnhtbD9yZXBvPXRlbmsmaXBhZ2U9Njc5ODQyNiZhdHRhY2g9T04=

The big takeaways from American Tower's 10-K:

1. American Tower and their competitors are in the business of providing solutions to our need for A Better Plan.

2. Cell and wireless demand is growing and there will be a corresponding need for cell sites.

3. Technology is moving and sites need to plan, when established, for flexibility to handle future growth and new technology.

4. Companies like American Tower are ready to pay for leasing land. That could be a source of revenue for the State from its parklands.

Besides help available from the cell industry, there must be examples of good solutions to cell/wireless coverage in areas like ours that are hilly/mountainous, near water, and with terrain that can't be built on. Switzerland, Germany, and the Scandinavian countries have surely faced such problems and developed solutions that are pacesetting from an environmental standpoint. There have to be best practices worth looking into. If industry is approached collaboratively by the appropriate state agency, it might very well study and report on best practices worldwide in areas like ours and present its best ideas at its expense.

In contrast with A Better Plan, please consider what's wrong with approving TM's proposal when you look at the problem from the four corners and take the long view:

- It's one-carrier. If TM wants to bring in other carriers, it would get to do so on its own terms, which could well be at odds with the interests of the community.

- It's an inferior site. I'll identify better ones in Part II: Problems with the Proposal.

- The site is limited with respect to expansion and the structure proposed is not capable of accommodating multiple carriers, wireless, and other services that entail bulkier hardware.

- There's essentially no revenue for the State, County, or anyone but TM.

- Approval sets a precedent for other carriers to propose their own antenna sites in our community. That creates the prospect that, by approving TM's proposal, Regional Planning ("RP") feels obligated to approve similar proposals from other carriers. That creates the possibility that a poor proposal turns into an outbreak of cell sites on our hill with an epidemic of similar blight right in front of homes all over our hill.

If you OK TM's proposal, you tap the smallest of the four major carriers instead of the carriers collectively and capabilities like American Tower's. TM has only 10% market share. (source: http://www.tomsguide.com/us/verizon-at-t-cellphone,news-1419.html). Three carriers are each significantly larger than TM: AT&T, Verizon, and Sprint. You'd be letting the most minor among the major carriers preempt the field so the benefit we'd get from the larger carriers gets delayed, impeding a better solution.

The best action you could take is to park TM's proposal and initiate government action toward creating and achieving A Better Plan than what you've tentatively approved that's now on appeal.

Part II. Problems with the Proposal

There are multiple problems with the proposal, any one of which is sufficient for you to accept the appeal and disapprove the proposal.

1. The proposal is inconsistent with our neighborhood's esthetic. We have underground utilities with nicely designed, pleasantly laid out light poles and minor amounts of cable hardware as the only above-ground utility equipment. We have a proven mechanism for ensuring that our neighborhood's esthetic is maintained, the Architecture Committee of our homeowner's association. Rather than taking the judgment on yourself, you should ask TM to submit its plans to our Architecture Committee, which TM can contact by phone or email at: 310-573-0071 or Architectural@sunsetmesa.net.

Our neighborhood is protected by recorded CC&Rs. An excerpt:

> No building, garage, fence or balcony shall be erected, placed or altered on any lot until the building plan, and specifications have been approved in writing by the Architecture Committee as to compliance with the ocean view protection clause, as set forth in Section (f) herein, and as to the conformity and harmony of external design with existing structures in the Tract in which the proposed erection, placement or alteration is located.

The Architecture Committee has functioned well for almost 50 years. It is fair, fast, and effective. It would not have been burdensome for TM to submit its proposal to the Committee before submitting it to you, and that's something you should ask TM to do now.

2. The proposed construction would blight our neighborhood needlessly with inferior coverage, because there are better sites that aren't right in front of people's homes. For example:

- There's one hill very close that's some 200 feet higher in elevation than the Shoreheights site with better LOS coverage of our hill and Castellammare. It's on a steep slope on unbuildable terrain that's probably State park land. The closest run to existing utilities, about 100 yards, would be via a concrete drainage swale connecting to the storm drain on Blue Sail Drive. The same site and nearby sites that have nearly as good LOS coverage are accessible from a) County property at the Cloudcroft drainage basin at the end of Cloudcroft Drive and b) the uphill end of Surfview Drive, where a posted State Park begins. These sites are close enough to community electricity that lines could be run underground. Antennas could be kept below ridgelines and blended into

tough terrain so as not to be visible from below. The sites afford enough room to install antenna structures large enough to accommodate multiple carriers, both wireless and cell signals, and future needs from evolving technology. The Shoreheights proposal can't do that.

- Two line-of-sight (LOS) miles away (maybe less) there's a developed site at the end of Everdin Mtwy. It's roughly NW from here and has a similarly commanding view of our Mesa and a lot else. Look at it very close up on a Google Sat Map and you'll see a number of buildings. One of the buildings is a white dome you can see from the ground here. Exhibit I attached is a telephoto of the Everdin site establishing that there are antennas already there. This is a big site, with utilities there, enough room to support all the carriers and for them to grow, and enough room to make the antenna installation look better than it does now.

- There's a peak with a similarly commanding LOS view of the Mesa about one mile north of us. It's accessible by a fire road that branches south off the "E. Topanga Fire Road." There's a clearing at the top but no sign of buildings or utilities. It's probably state park property, and the tower company might have to spend a little money and make a deal with the state, but they could provide good service from that site.

- There's a trailhead park at the top of Surfview Drive. Just above the park, there's a structure on a ridge that appears to be an antenna. See the photograph in Exhibit II. This site would have good LOS coverage of our hill, but would be harder to camouflage esthetically, especially with the ridgeline.

I don't claim any special expertise on cell antenna sites, just common sense and some engineering background. I do believe that any fair-minded person looking at the hilly/mountainous terrain surrounding our community, some with antennas, would conclude that it's worth looking at best practices with cell antennas in other places and looking at the alternative sites noted above before committing to the proposed Shoreheights site .

3. There's a precedent with the City denying a TM cell tower proposal like ours. It was reported in a local paper and is accessible in the paper's archives at:

http://www.palisadespost.com/content/index.cfm?Story_ID=3976

One of the key points was neighborhood esthetics where the neighborhood also has underground utilities. We should get equal protection and not suffer because we're in the County instead of the City. Part of our hill is in the City, and it's likely that, if other carriers want to put antennas on our hill, they'll bring them to the County part of our hill, because RP will be seen as easier than the City if/after you've approve TM's proposal.

4. The Hearing Officer's Package ("HOP") prepared for the first hearing was condescendingly dismissive of geology concerns. The writer evidently relied on the AESCO Technologies Geotechnical Report. The report is a normative report relying on drilling samples. On page 1-1, the report defines its scope, which does not including looking around the neighborhood and seeing/evaluating an active landslide one house away from the site TM proposes. See Exhibit III for a photo

of the landslide, which appears to affect two houses very close to the site TM proposes

I understand that the geology question was treated dismissively at the hearing as well. I believe from conversations with neighbors that County files contain both original geology reports for construction of that house, which may have involved a waiver by the County, and reports filed with the County when the latest landslide occurred a few years ago. Following that slide, I believe that the County prohibited occupancy because of safety issues, and that reports were submitted to the County satisfactory for a permit to resume occupancy.

There was/is a landslide area a few dozen feet from the proposed antenna site. The house may be fit for occupancy because it has a foundation way down in bedrock and sits on the caissons visible in Exhibit III, but that does not mean there isn't a landslide that wouldn't affect the stability of that whole side of the street, including TM's proposed site.

The AESCO report ignores the landslide problem, excluding it from its scope. Files sufficient for a reasonable evaluation of the landslide risk and the degree to which the proposed construction might exacerbate it very likely exist in the County's (RP's) files. I ask you to have skilled staff look at those files and include its conclusions on the landslide risk in the HOP for the appeal. If necessary for that to happen, the hearing can be postponed or continued. If RP finds additional risk, it might reasonably ask TM for further study and/or to hold harmless homeowners put at risk by exacerbation of the landslide risk by the antenna construction. There's precedent for that in that TM, as part of its proposal, has undertaken to hold the County harmless generally.

For RP to tell concerned homeowners to commission a new geology study to evaluate their concern with the landslide and its potential exacerbation by TM's proposal, if approved, is terrible, dodgy performance by RP, since RP can and should first look at geology reports in its own files and, with people on its staff with the requisite skills, assess those reports itself and either instruct TM to look further into the matter or tell the appellant substantively why that's not necessary.

5. It's clear that some property values would be damaged by having a cell tower put just feet away from people's homes. That's common sense. There's no way to prove the point experimentally, though homeowners who'd be affected could readily find experts who would so testify. One way to resolve the issue and any difference in views would be for you to require TM to settle the issue financially with affected owners. Alternatively, such owners might sue TM to prevent loss of their property value, and were I one of them, I'd have done that already.

6. TM, TM's parent company, Deutsche Telekom ("DT"), and RP all have histories of corruption. DT's has been reported on extensively. For example, see:

http://www.dw-world.de/dw/article/0,,4007413,00.html

and

http://www.spiegel.de/international/business/0,1518,555363,00.html

On RP, the coverage of the local matter involving Emmet Taylor was less extensive, but there's one story, with no followup in the Los Angeles Times at:

http://articles.latimes.com/2002/oct/12/local/me-fraud12

I crossed paths with Mr. Taylor about two years before he was indicted;, he took part in dealing with a case where I asked for help from RP. There's no way to prove what did/didn't happen, but I formed the impression, based on doing business in many different countries, including some where corruption is common, that I did not get straight play from RP.

To raise the odds that we're getting straight play on the TM proposal, I'd ask you to: a) have whoever prepares the HOP for the appeal hearing include disclosure of any payments made by TM to the County or promised to be made besides the token amounts already disclosed and include certification that neither RP nor County employees have received any improper payments or promises from TM or anyone acting on its behalf, and b) similar disclosure by TM, including campaign contributions made in California, and certification by TM that no improper payments or promises have been made in connection with the proposal at issue, specifically payments or promises of the kind prohibited by the Foreign Corrupt Practices Act.

7. Ten years as a term for the CUP is too long. In contrast with what we ordinarily think of as utilities with mature technology (power, water, land-line phones), the technology of cell/wireless service is changing rapidly. See, for example:

http://en.wikipedia.org/wiki/4G

There will be a 5G and more after that, nobody knows how wireless will evolve, and there's no telling what demands will be put on antenna installations by growing demand and evolving technology. If TM's proposed small installation proves inadequate to needs two or three years in the future and good multi-carrier service is available from alternative sites, the Shoreheights antenna, if it exists then, should be subject to review with a view toward its removal as obsolete and unnecessary. I ask you to limit the term of the CUP to three years.

Finally, to preserve the grounds for possible future litigation, I also object to the exemption of the proposed tower as a small structure and to its construction as exempt from Coastal Commission review.

Conclusion

My writing you began with an objection to blighting our neighborhood with the tower TM proposed. As I looked into the matter and thought about it, I concluded that the problem ought to be looked at in a different way from RP's usual way of looking at submissions one at a time and generally siding with developers. I concluded that RP is probably not the right agency to think big, as I outlined in A Better Plan, but I would gladly be proved wrong on that.

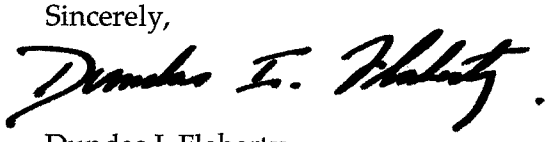
Nevertheless, I have objected on conventional grounds, and I'm sure you understand why from my arguments.

I will write and send copies of this letter to others whom I think could help make A Better Plan happen.

If I can provide further information or do anything else helpful, you can phone me at 310/454-0041 or email nonsolum@earthlink.net. Let me know if you'd like copies of my letters to others, photos of other sites mentioned in the text but for which photos werem't included, screen grabs of Google Maps sat shots, or anything else that might help.

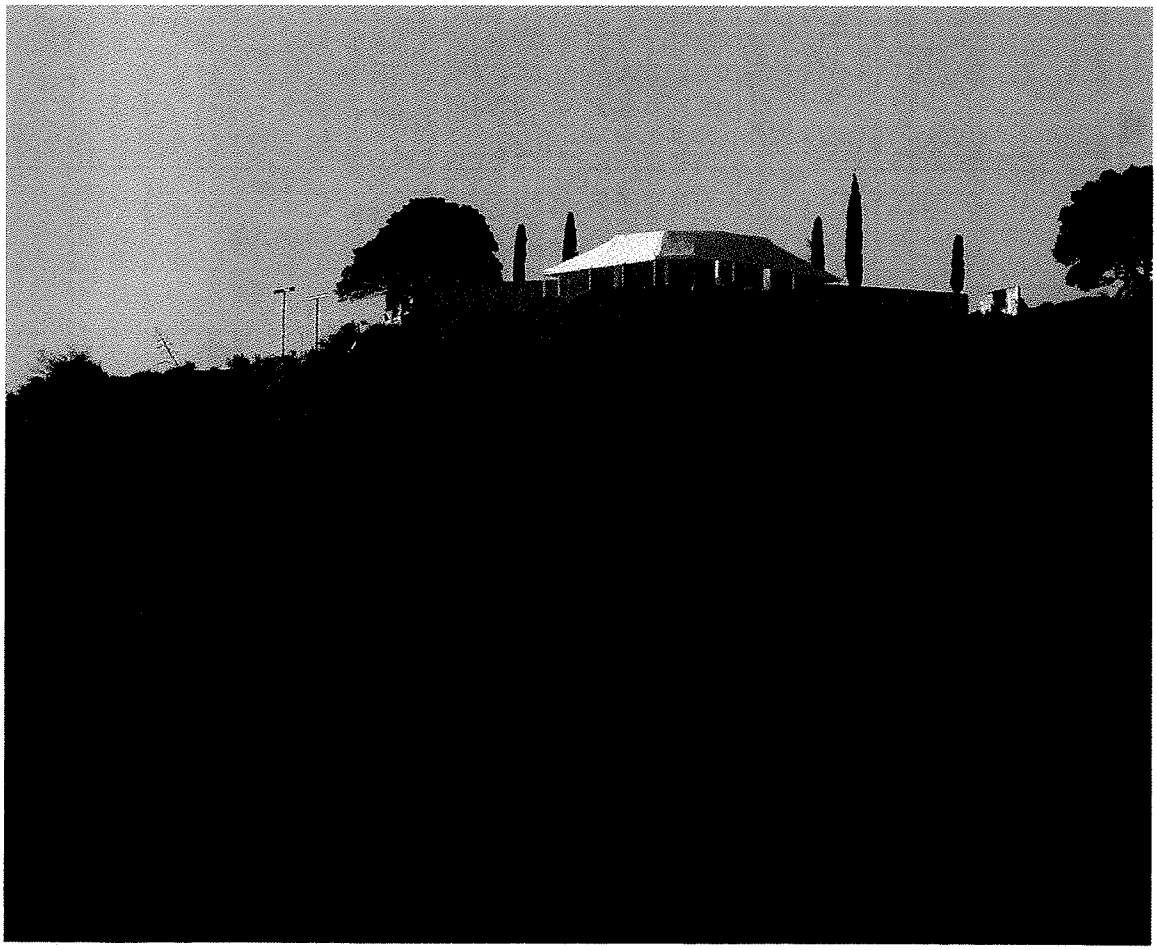
Thanks for listening.

Sincerely,



Dundas I. Flaherty

Exhibit I

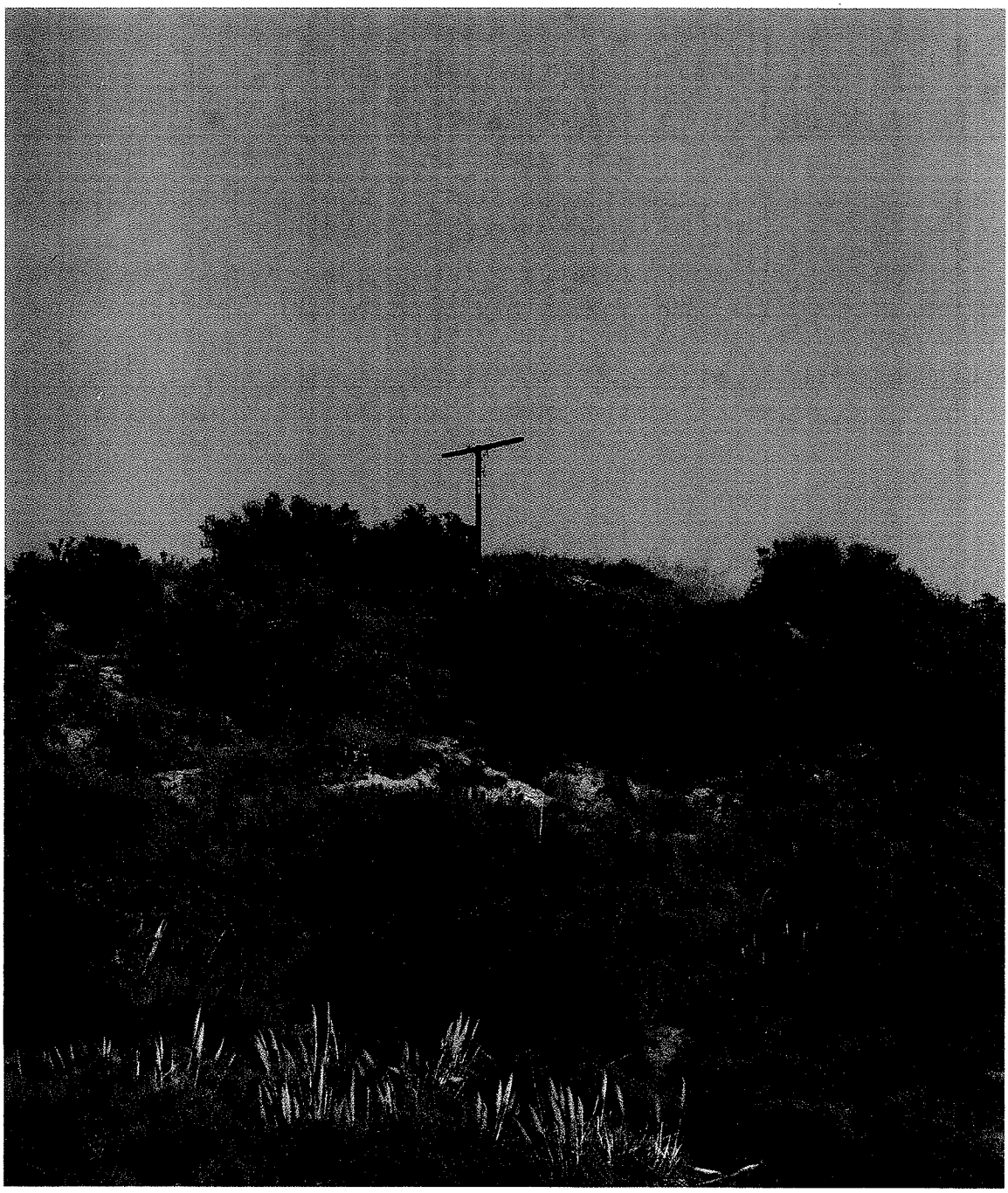


This is an excerpt from a telephoto of the Everdin site described in the text. There are clearly antenna structures at the left, and what appear to be Italian Cypresses may actually be antennas.

This site is less than 2 LOS miles from our community and has terrific coverage.

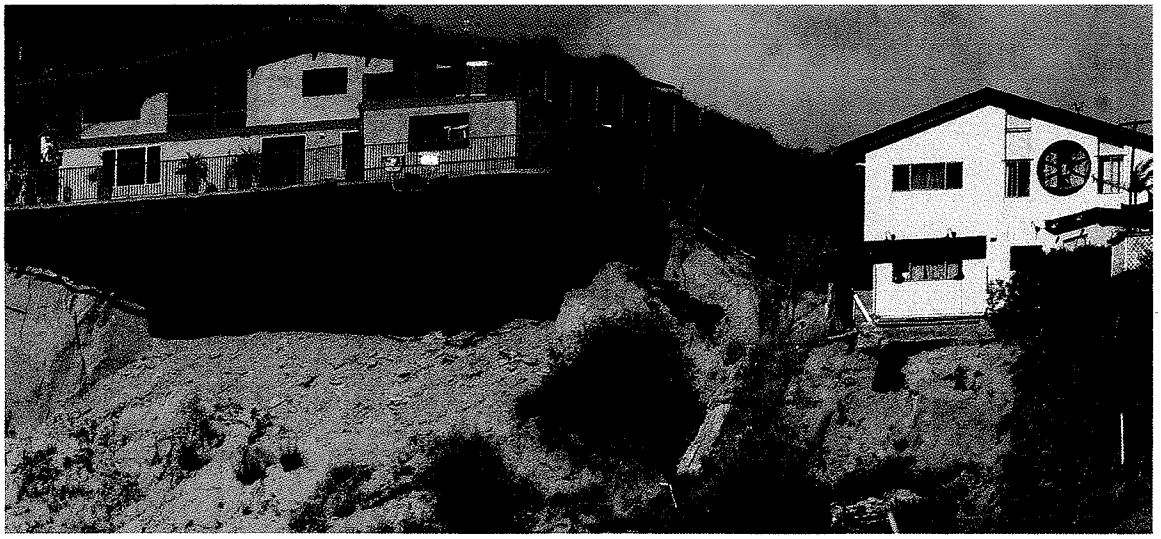
Google Maps satellite images of this installation suggest a developed area with utility service.

Exhibit II



This photo is an excerpt of a telephoto shot from below in the trailhead park at the top of Surfview Drive. LOS coverage from this site is better than coverage from the site proposed by TM, but not as good as others noted in the text.

Exhibit III



This is a photo excerpted from a long telephoto shot taken from below from Topanga Canyon Boulevard.

The site TM proposes for its antenna structure is on the other side of the house shown.

The slide appears to affect both houses.

Dear Daniel Fierros,

We are against having a tower erected on Shore heights Dr (behind fence, county) Malibu 90265.

(1) Health Reasons
(2) Environmental concerns
(3) Loitering
(4) Overnight trespassers
(5) Visual Objections.

Thank you very much for including us among others w/like concerns.

Sincerely,
Mrs. Henry K. (Toni) Cordier
April 12 - 2010

RECEIVED
APR 14 2010

310-459-2066.
HENRY K. CORDIER, F.A.S.A., F.S.V.A.
Fine Arts and Personal Property Appraisals