

## **Declaration of Holly E. Manion**

I, Holly E. Manion, declare as follows:

1. I am a licensed real estate broker in the State of California, and I have lived in Rancho Santa Fe my entire life. My license number is DRE 00646025. I have been a real estate professional full time for 40 years, and I founded Rancho Santa Fe Realty located in Rancho Santa Fe, California. My firm is now part of Pacific Sotheby's International Realty.

2. I represent buyers and sellers in North San Diego County. I have had numerous experiences with clients who when informed that wireless cell sites are located on or near properties in which they were interested initially, have refused to pursue transactions because of these wireless facilities. Currently, I represent sellers who have placed their home in Rancho Santa Fe on the market. It is a 4 bedroom, 3 bathroom house designed by a master architect in San Diego with stunning views. It is located on two usable acres. My clients are asking in excess of \$2 million for the property. A utility pole to which three wireless antennas are attached is located on the County right of way close to the front garden. Three potential buyers came to tour the property, but would not even walk in the door because they were so concerned about the close proximity of the wireless cell site and its potential health risks. There is one prospective buyer who loves the property as it is perfect for her family of four. Her mother, however, will not lend her daughter the necessary down payment to purchase the property due to her concern about the potential health hazard resulting from the wireless antenna especially for her grandchildren who would play in the front yard. The property has been on the market for more than four months, with no offers and few showings. The current market for equivalent homes in this area is strong.

3. Another example of which I am familiar involves two of the least expensive lots in Rancho Santa Fe Covenant. They are listed for less than \$1 million, an exceptionally low price for the area. One of the lots is 2.9 useable acres, with lovely views. It was just reduced in price from \$715,000 to \$630,000. It has been on the market 325 days with no offers. I have shown this property twice this year to qualified buyers. They had no interest in making offers after they learned that there is a wireless cell site disguised as palm trees near these properties. These fake palm trees with their wireless facilities are at least 1,500 feet away in an adjacent community, Hacienda Santa Fe. Although the lots are gorgeous, neither of these two clients were interested in pursuing a purchase at any price.

4. Numerous of my clients have refused to purchase properties near a well-known sports park in Encinitas because of the wireless antennas that are mounted on athletic field light standards towering over the playing fields.

5. I am a member of the San Diego County Board of Realtors, and I use the "Local Area Disclosures for San Diego County" in all of my transactions as required by the Board. This form includes a disclosure of Electrical and Magnetic Fields and notes the

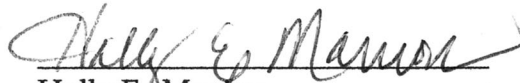
"public concern with EMFs" affecting a property's value. Attached as Exhibit A to my declaration is a true and correct copy of the current version of the "Local Area Disclosures for San Diego County." In addition, I use the "Seller Property Questionnaire" for all my transactions. The Questionnaire states "Note to Seller: Purpose: To tell the Buyer about known material or significant items affecting the value or desirability of the Property ...." It includes a disclosure for "[neighborhood noise, nuisance or other problems from sources such as, but not limited to, the following: ... cell phone towers...." Attached as Exhibit B to my declaration is a true and correct copy of the current version of the Questionnaire.

6. In my professional experience, wireless sites that generate radio frequency emissions on or near residential properties cause a diminution in the value of these properties. This is due to the fact that some likely buyers refuse to even look at them, which leads to the properties staying on the market longer than like properties that do not have cell sites in the vicinity. Over time, this inevitably leads to sellers lowering prices to ensure they can sell their properties.

7. My neighbors and I are extremely happy that Rancho Santa Fe Association is installing 60 miles of underground fiber optic cable network. The trenching for fiber optics is almost completed and we will have the system up and running this year. We believe this network is going to provide us with better quality, faster, safer, and more secure Internet connection than we currently have with the wireless systems available to us. It is my understanding that fiber optics do not emit radio frequency radiation like wireless systems. It is my professional opinion that if the communities in which I work only had fiber optics and no wireless facilities, my clients would no longer have the health and safety concerns I discussed above. I also believe I would then be able to sell their properties more quickly and at top dollar.

I declare under penalty of perjury that the foregoing is true and correct.

April 8, 2019

  
Holly E. Manion