

ENVIRONMENTAL STATEMENT  
K256CT DENVER, CO, CH 256D  
MINOR CHANGE APPLICATION  
MOUNTAIN COMMUNITY TRANSLATORS, LLC  
FEBRUARY 2022

The applicant proposes mounting a new antenna on an existing 15.2 meter un-registered tower. The proposed Center of Radiation will be 12.8 meters Above Ground Level. An 8 element Yagi, with dual polarization, Nicom BLK 8-E directional antenna system is proposed. Calculations were made using FM Model for Windows, version 2.10. The proposed antenna Center of Radiation, above ground, was reduced by 2 meters to allow for the average height of a human on the ground. FM Model predicts a peak exposure of  $15.6 \mu\text{w}/\text{cm}^2$  at a distance of 11 meters from the base of the tower. This represents 7.8 % of the allowable Maximum Permissible Exposure (“MPE”) of  $200 \mu\text{w}/\text{cm}^2$  for uncontrolled environments at any point on the ground. Since the Nicom antenna is not specifically listed in the FM Model program, the Opposed V-Dipole “EPA Type 2” antenna was used for the study since it best reflects the antenna to be utilized. With an Effective Radiated Power of only 99 watts, it should be categorically excluded from environmental processing.

The applicant will ensure that the public access to the tower is restricted by fencing, anti-climb devices or other appropriate measures. The site will be posted with RF warning signs. If climbing of the tower by authorized personnel becomes necessary, transmitter power will be reduced to safe operating levels, or transmission even terminated, as necessary as not to exceed the RF exposure limits to tower workers. The

licensee will cooperate with other users at the site with the scheduling of such tower or antenna maintenance.

No modification of the existing tower is proposed, other than the proposed side mounting of the antenna system and addition of a transmission line. The tower was constructed prior to March 16, 2001. The National Programmatic Agreement generally allows such a collocation without consultation or review under Section 106 and Subpart B of 36 CFR §800. The applicant believes that it is in full compliance with the Agreement, and that no further study is required.