

DELAWDER COMMUNICATIONS, INC.

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ENGINEERING REPORT

Willow Creek, CA, FM Minor Modification for New Station

EXHIBIT 31 - ENVIRONMENTAL STATEMENT

The proposed antenna is being side-mounted at the 26 meter level on an existing tower structure with an overall height (including appurtenances) of 34.7 meters AGL. The existing tower is part of the Horse Mountain antenna farm. Therefore, pursuant to 47 CFR Section 1.1306, Note 1, this proposal is categorically excluded from the provisions of 47 CFR Section 1.1307(a). (47 CFR Section 1.1307(a)(4) is not applicable to this proposal.)

This FM station proposal specifies a maximum ERP that is less than 0.3 kilowatts (peak). Assuming: (a) a maximum ERP of 0.3 kilowatts and circular polarization (for 0.6 kW total); (b) a relative field of 0.3 maximum for pertinent downward vertical angles; and (c) a distance of 20 meters from the lowest antenna element to 2 meters above ground level, the maximum power density is calculated as follows:

$$S = 33.4 (F)(F)(ERP) / [(R)(R)]$$

Where, S equals power density in uW/cm²

F equals the relative field factor

ERP equals the effective radiate power in watts

R equals the distance in meters

$$= 33.4 (0.3)(0.3)(600) / [(20)(20)]$$

$$= 4.5 \text{ uW/cm}^2$$

4.5 uW/cm² represents less than 3% of the uncontrolled power density limit (200 uW/cm² for FM). The electromagnetic radiation from this proposed operation will not produce a value in excess of the radiation standard. The electromagnetic radiation from the proposed operation will not combine with other facilities on or near the structure to produce a significant change in value.

If this is a structure that may support various other operations, the applicant will cooperate with the other operators in establishing a plan for work done on the structure in close proximity to the existing antenna.