

ENVIRONMENTAL STATEMENT
K225CZ BOULDER, COLORADO, CH. 225D
HUNT BROADCASTING, LLC
FCC FORM 349
MAY 2019

The applicant proposes mounting a new antenna on an existing 51 meter registered tower, 1024061. The proposed Center of Radiation will be 41 meters Above Ground Level. The ERP will be 0.25 kilowatts (250 watts) with horizontal and vertical polarization. A Nicom BKG 77, non-directional one bay antenna 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 $6.6 \mu\text{w}/\text{cm}^2$ at a distance of 11 meters from the base of the tower. This represents 3 % 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 worse case "Type 1" antenna was used for the study.

There are four other users at this site, K260AL Arvada, Colorado, facility ID 140238, K274BW Berthoud, Colorado, facility ID 140247, K245AD Arvada, Colorado, facility ID 140240 and K255DA Boulder, facility ID 157875. From FCC records, K260AL produces a worst case peak exposure of $2.935 \mu\text{w}/\text{cm}^2$ at any point on the ground. K274BW produces a worst case peak exposure of $0.767 \mu\text{w}/\text{cm}^2$ at any point on the ground. K245AD produces a worst case peak exposure of $5.8473 \mu\text{w}/\text{cm}^2$ at any point on the ground, and K255DA produces a worst case peak exposure of $6.6 \mu\text{w}/\text{cm}^2$ at any point on the ground. Even if all five of these facilities were directly added together,

the worst case peak exposure on the ground would be 22.7493 $\mu\text{W}/\text{cm}^2$ at any point on the ground, or still well below the 200 $\mu\text{W}/\text{cm}^2$ limit for un-controlled areas.

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.