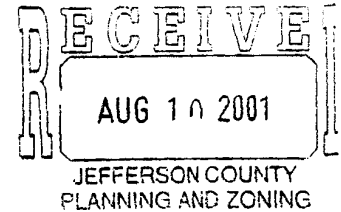




ROCKY MOUNTAIN CHAPTER
1410 Grant St, Suite B303
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Kirk Cunningham, Conservation and
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Susan Wood, Case Manager
Jefferson County Planning and Zoning
100 Jefferson County Parkway, Suite 3550
Golden, CO 80025

RE: Case no. 00015485RZP1 and 00015485EXP1

Dear Ms. Wood,

These comments are submitted on behalf of approximately 10,000 members of the Sierra Club who live in Boulder County, Jefferson County, and other counties whose views of the foothills would be marred by further development of the Eldorado Mountain site by Pinnacle Towers, Inc.

The Sierra Club has been following the Pinnacle Towers, Inc. request to rezone Eldorado Mountain and wishes to express a number of concerns. A primary criterion in assessing the appropriateness of any rezoning is whether the proposed use is consistent with the historical and existing land uses in the area.

Eldorado Mountain has a broadcasting facility that has been in existence since the early 1980's. The existing facility was approved under a Special Use permit for one acre of land, which enabled the current 160-foot tower and support buildings. The Pinnacle Towers, Inc. proposal would allow for a significant expansion of the existing facility.

We observe however that the subject property is a prominent landmark in a large continuous of corridor of recreational and conservation lands joining Jefferson and Boulder Counties. Much of the land surrounding Eldorado Mountain has been carefully protected from industrial development by local municipal and county, and state governments. The Pinnacle property is bounded on the north by Boulder City Open Space land and on the west by Eldorado Canyon State Park. Jefferson County Open Space itself has made significant investment in the Eldorado Mountain area in acquiring the Ranson/Edwards Homestead, the Lacey and the Asel properties.

The summit of Eldorado Mountain is shared by the City of Boulder that acquired the Eldorado Mountain Open Space as a concluding phase of the Conda Mine episode. In that effort,

415-acre open-pit mine on the eastern side of the mountain was closed following more than 6 years of dedicated community involvement and the efforts of local governments and State Parks. The Conda Mine was widely opposed because of its horrendous visual impacts on land adjoining the State Park, land that is an integral part of the prominent Front Range mountain backdrop view.

The Pinnacle property is bounded on the west by portions of Eldorado Canyon State Park acquired from the BLM in 1997, following an original application made ten years earlier. The BLM transferred this land to State Parks for public recreation. The Pinnacle Tower plan would access the tower facility through the BLM patented land belonging to Eldorado Canyon State Park. It is inconsistent with the purpose of the State Park to provide corporate access to the site through this land. Such access is still contingent on Jefferson County approval. We understand that the access road does not meet County standards for emergency access, and it seems that the provision for a heliport and helicopter access would enable client and personnel access. The intrusive noise and overhead flights would further interfere with recreational uses of the State Park.

We understand that until recently, the Keller family was negotiating the sale of over 1000 acres of land adjacent to the site and to the State Park that was previously proposed for development of an open pit mine. The acquisition of the Keller property by Jefferson County Open Space would be consistent with long-range preservation efforts and recreational land uses in the area and is strongly supported by the Sierra Club. Such uses are preferable to industrial development in this area, and Jefferson County should pursue the acquisition of these lands for public open-space.

The Pinnacle Tower proposal is antithetical to the existing conservation and recreational land uses in the area. The Pinnacle plan will spoil an extremely valuable public asset that currently serves a large population of Denver area residents and connects thousands of acres of public open space and park lands. The Sierra Club is concerned that the Pinnacle proposal is already interfering with the management of these public lands.

Along the entire mountain backdrop of the Front Range, the land surrounding Eldorado Mountain has been the object of persistent attempts by multiple jurisdictions, agencies, and community groups to preserve the natural environment and the scenic qualities of the area. The area was specifically identified as a critical preservation area in the 1994-1998 Mountain Backdrop Study. Eldorado Canyon State Park is widely regarded as an exceptionally beautiful public recreational area. The proposal to develop a large, multiple tower facility on Eldorado Mountain for high-power DTV broadcasting and other telecommunication purposes, relies on the use of public land to mitigate the negative impacts of the large-scale expansion of the existing site. This is an unacceptable use of public land that was acquired for the preservation of natural beauty and wildlife habitat.

Pinnacle's proposed facility with towers up to 450 feet tall would dominate the mountain back drop near Eldorado Canyon State Park, and create a significant visual impact in a heavily used recreational area. The Pinnacle proposal will directly impact the outdoor experience of hundreds of thousands of residents and visitors alike who use these areas. Pinnacle's towers, buildings and obstruction lighting would be prominently visible on approach to the State Park and from many vistas within the Park, and from other area open space lands. We feel that this would permanently degrade and destroy the view of the Flatirons from the north and along Highway 93.

It should be pointed out that the existing facility has grown in recent years with the addition of numerous antennae on the transmitter building that is visible from the east. The ridgeline site is also noticeable at night with the flood light that has been present for a number of years now.

We are not sure whether these visual impacts were planned or analyzed as part of the 1984 permit, and we believe that these present impacts are not desirable on the mountain backdrop.

In our considered opinion, Eldorado Mountain is not an appropriate site for a large-scale, multiple tower facility. Other existing and potential sites with fewer overall impacts should be used for such a facility. Alternate sites should be systematically evaluated so that an informed, well-planned choice is made by the County. In conclusion, we request that Jefferson County deny approval the rezoning proposal.

Sincerely,



Kirk Cunningham