

Squaw Mountain Communication, Inc.
Denver's Leading Telecommunications Site

Susan Wood
Jefferson County Planner
100 Jefferson County Parkway
Golden, Colorado 80419

June 16, 2001

RE: Application for Rezoning and Exemption from Platting (case # 00015485RZPL and 00015485EXPI)

Dear Ms. Wood,

This letter is in reply to the Pinnacle Towers Inc. (PTI) response to community comments dated May 30, 2001 and the misinformation that was submitted referencing Squaw Mountain. See the attached PTI's corresponding pages for your convenience. Pg. 17 ph. 2, PTI says Squaw Mountain Communications, Inc. (SMC) makes a bald (bold) assertion to claim we can accommodate 22 TV and 8 FM stations. I guess I'm perplexed. What is so bold about the truth? Isn't PTI proposing the same thing? Lets not cloud true statements by additional complex rhetoric. Squaw Mountain has adequate land, adequate approved building facilities and Tower space to accommodate all the broadcasters in the Denver Market. Unlike Eldorado, SMC already has an approved ODP to back it up. As PTI states, Pinnacle has to go through a "rigorous and expensive" plan. That's because PTI is trying to get zoning approval for a facility that has a multitude of site-specific issues as well as strong community opposition. Squaw Mountain successfully obtained their approval over a decade ago.

Squaw Mountain Communications, Inc. can provide more than adequate facilities for all Broadcasters. Squaw Mountain has 3 different tower sites, and unlike Eldorado, Squaw Mountain Communications, Inc. has easy access, as the county plows up to the front security gate. Due to the strategic placement of the tower sites on Squaw Mountain, SMC is not exposed to the excessive 200-mph winds that have been recorded by the State, in the Eldorado area.

On page 17 paragraph 2, the amount of vertical seperation is relative. Squaw Mountain Communications, Inc. is located on 30 privately owned acres with 2 sides being National Forest, and is not subject to public access or significant development. It also sits back from the property lines; RF Fields are below the National Standards at all locations on and off the property. The tower location is away from the property line which gives ample room. Eldorado is not a highly developed residential area, neither is Squaw Mountain. However, Eldorado is much closer to significant population than Squaw Mountain. The 13 houses within 1 mile of the surrounding area on SMC are below and away from the towers; no threat is posed to them. Squaw Mountain's location provides a safe environment. No public area will ever exceed the standards.

In relation to PTI's comment about Squaw Mountain Communications, Inc. perhaps needing taller towers (pg. 17, ph. 2). Due to SMC's HAAT (Height Above Average Terrain) if you were holding an antenna in your hand on SMC, it's the equivalent of a 2000 ft. tower on flatland. A taller tower is of no benefit to the broadcasters or SMC. This argument is meaningless, that would be like saying a 1500 ft. tower in the center of Lakewood would be no problem. In the Mullaney - Raines report, figure 2-6, it shows all sites, including Eldorado, would have some populated blanketing interference, despite Eldorado's 1500 ft. vertical separation.

Continuing on pg.17, ph.2 PTI comments that if the towers on SMC were taller (which is explained above as unnecessary), the taller towers might interfere with other communications facilities. Building the tower 1500' (or some figure in that range) as to interfere with the top of Squaw Mountain is not what SMC has ever requested, planned, built or considered and has no intention or need to consider. That's like saying if PTI built a 100,000 ft. tower will they interfere with a space shuttle, both scenarios are creative meaningless.

Contrary to the comment (pg.17 ph 2) KYGO's Booster "multiplies rather than consolidates sites." The KYGO Booster is in fact on an existing consolidated multi-user site. In Boulder alone the following have booster/translators; KYGO 98.5 and KXPX 96.5 on Squaw Mountain, KIMN 103 on Mt.Morrison, KXKL 105 Mt.Chief, KXUU 102.1 in Estes Park, as well as, KHHH on Lookout Mountain has a 94.1 translator, KJMN has a 101.7 translator and KRFX on Lookout has a 103.1 translator in Boulder. Lookout Mountain, Mt Morrison, Mt.Chief and Squaw Mountain all need a booster/translator in order to get good coverage in Boulder. Please note, potential clients on Eldorado will need translators/boosters in their respective areas. It's not about Eldorado's glass being half full and Squaw Mtn's being half empty. Squaw Mountain works and so does Eldorado, Lookout Mtn. and Mt. Morrison. **The difference is, Squaw Mountain Communications, Inc. has an approved ODP as a Community Telecommunications facility, does not effect public health or create a negative visual impact on the beautiful mountain backdrop.** Squaw Mountain Communications, Inc. can construct more facilities as clients come on board (PTI refers to this as scalable, reference pg.3, ph.3).

As we've stated before, all 4 major sites, Squaw Mtn., Eldorado, Lookout Mtn. and Mt. Morrison, work and work well. Due to the terrain in Colorado, all sites have shadowing. It appears that Eldorado has their shadowing for a large stretch at Green Mtn., Lakewood, Littleton, West Boulder, N. and S. Table Mountain and parts of Douglas County (which the census bureau projects the largest growth % to happen in Douglas Cty). Squaw has proven it can technically solve shadowing; Eldorado should also be able to. PTI's Longley Rice report (Mullaney-Raines figure 7-16) shows that all sites are similar in coverage and all sites get a large % of the population. Squaw Mountain Communications, Inc. reaching the most people at 2,622,652 vs. Eldorado at 2,340,585.

The statement on Pg 18 of the Mullaney-Raines report finds that "each of the sites provides suitable coverage, subject only to the shadowing from Squaw Mountain. However Eldorado is found to be superior when consideration is given to interference to residential electronics and RF exposure issues." PTI's own report (Mullaney-Raines pg. 3 of 15) actually shows Squaw Mountain as having the least predicted interference. How does that make Eldorado superior? Based on the PTI report Squaw Mtn. is superior. Both SMC and Eldorado have the smallest populations effected, both being negligible.

The heavy treatment of singling out SMC in PTI's reports leads one to several conclusions. An example of this unbalanced treatment is that PTI did not do a shadowing study on any site except Squaw Mountain, yet every site has shadowing. (Mullaney-Raines figure 17-20) Then PTI blew up the quadrants to make a more dramatic effect. From a marketing standpoint that's brilliant but one could question PTI's motive. Due to the terrain, all sites in Colorado have shadowing, as witnessed by the need for the number of stations on different sites that have existing booster/translators as demonstrated above. Perhaps Jeffco may wish to have Mr. Hart do a study pulling up all the boosters/translators in the area, which will give Jefferson County conclusive proof that shadowing exists on all sites.

Squaw Mountain Communications, Inc, due to its location, does not have to compensate for the Quiet Zone, as do other sites (reference pg. 3,10,11,12,13). The Quiet Zone is a sacred cow. Speculation of decommissioning is just that, speculation. Given the history, in the recent past, of other companies with vast wealth and power behind them having failed to eliminate the Quiet Zone, it appears highly unlikely the Quiet Zone will be decommissioned, now or ever. Compensating for the Quiet Zone is site specific to Eldorado, Lookout and Mt. Morrison, and is not an issue for Squaw Mountain Communications, Inc.

On page 4, ph.1, PTI states that their "proposed towers will have a visual effect, which can not be avoided" and pg.5, ph.3, PTI states "placing telecommunications facilities in populated areas results in health concerns, but placing them in unpopulated areas raises concerns of visual impacts" SMC does not and will not stand above the ridgeline. Unlike Eldorado, Squaw Mountain Communications, Inc. does not have, nor foresees in the future, the need for strobing, lighting and painting, due to the height of the towers. SMC is well away from populated areas eliminating health concerns. Both negative visual impact to the mountain backdrop and health issues can be avoided by Broadcasters consolidating and moving to an already approved Community Telecommunications Site - Squaw Mountain Communications, Inc.

With the multiple unresolved issues confronting PTI, it would appear that PTI could best serve it's own cause by addressing only relevant, factual issues and those relating to Eldorado. PTI states (Pg.36, ph.2) "PTI has demonstrated that other sites are incapable of accommodating the proposed facility" that simply is not true. **SQUAW MOUNTAIN COMMUNICATIONS, INC. can accommodate and facilitate everything that PTI is proposing and SMC is already approved to do it NOW!**

Sincerely,



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CC:

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