



PINELANDS PRESERVATION ALLIANCE

17 PEMBERTON ROAD
SOUTHAMPTON, NJ 08088
PHONE 609.859.8860 FAX 609.859.8804
ppa@pinelandsalliance.org

September 29, 2011

Larry Liggett
NJ Pinelands Commission
15 Springfield Road
P.O. Box 359
New Lisbon, New Jersey 08064

Re: T-Mobile Northeast, LLC's amendment to PCS Communications Facilities Plan

Dear Mr. Liggett:

The Pinelands Preservation Alliance reviewed the amendment to the PCS Communications plan submitted by T-Mobile Northeast, LLC and has the following comments:

PCS - 69

This location comes up in Manchester Township on the Heritage Mineral Tract, which is 8,000 acres in size. A portion of this tract, approximately 3,450, acres are within the Pinelands Protection Area. Since the applicant is asking for this as a location in its PCS plan they must be looking to place a tower on the Pinelands portion of the tract.

A settlement agreement was signed by the land owner, DEP CAFRA and the Pinelands Commission which calls for no development of those portions of the Heritage Mineral tract located within the Pinelands area. Development of a cell tower on those portions of the tract that are considered deed restricted or areas to be used for habitat enhancement pursuant to the stipulation of settlement would void this agreement.

Site #69 should be removed from plan.

PCS – 70

This location comes up at the intersection of Horicon Avenue and Route 539, mostly surrounded by state owned land. The PCS document says there appears to be “substantially

developed areas” that would be appropriate but looking at aerial photos there are no mining or landfill sites. There is a paint ball facility and a gun club but no substantial development in the area. No sites that meet the CMP requirements can be seen on aerial photos and disturbance is within the joint base property.

PCS - 72

Once this site is in the plan, what are the assurances that the applicant will use the First Energy Electric transmission towers? If they don't get permission will this mean an additional new tower? This concern is raised due to the large amount of undeveloped public open space in the area and PPA would not support its use.

PCS - 76

The location comes up in the Barnegat Township Forest Area and is listed as an existing structure. This existing structure may be the sand and gravel mining site known as the Old Johnson pits. The site is currently being used as a solid waste trucking depot, without any applications to Barnegat Township or the Pinelands Commission. This violation needs to be resolved before anyone is allowed to move forward with a plan that includes this site.

PPA learned from the first cell tower plan approved that even though the plan says there is an “existing structure” the towers for sand and gravel mining operation will not support what is needed to provide cell service. It will entail a new larger structure and should be considered a new structure, not an existing one, in the plan.

PCS - 77

This location comes up in Lacey Township in the Preservation area and is near Webbs Mills in the Greenwood Wildlife Management Area, which is state owned land. This would be on the edge of the Forked River Mountain 5 mile buffer, no structures or sites that meet the CMP currently exist. This location should be removed from plan.

PCS - 81

This location comes up in Lacey Township in the Forest Area and is near a junkyard which would qualify as existing commercial, but if the applicant does not secure this location, the closest alternative site would be the firehouse down the road, meaning encroachment into the 5 mile buffer of the Forked River Mountains. This site should not remain in the plan unless there are assurances from the applicant that it will not enter the 5 mile buffer of the mountains.

PCS - 83

This location comes up in Berkeley Township in the Forest Area at the intersection of Dover Road and Pinewald-Keswick Road. Double Trouble State Park and County Route 530 intersection property is located in this area. There are no locations that meet the CMP

requirements. Moving west is towards RJ Miller AirPARK and east is towards the Forked River Mountains. The applicant should demonstrate that there is a suitable location or Site #83 should be removed from plan.

PCS - 86

This site is listed as being in the Forest Area of Stafford Township. A view of aerial photos doesn't reveal any sites that meet the CMP requirements. The PCS plan suggests there is an existing firehouse. This may be the firehouse in Warren Grove in Little Egg Harbor Township, but this firehouse lot does not appear to be large enough to support new construction of a cell tower. If it cannot be sited at the firehouse there doesn't appear to be a location that meets the CMP and this location should not remain in the plan. It is hard to imagine that a cell tower could be compatible with the existing structures and uses of the Village of Warren Grove.

PCS – 88

This site is also in Little Egg Harbor Township, near Route 539 & Munionfield Road. This is the Pinelands Preservation Area and is entirely surrounded by state owned public open space. This area is within the area listed in the Special Areas Map of the CMP, Figure 7.1, page 204 as the area necessary to maintain ecological integrity of the Pines Plains. It is documented habitat for a large number of threatened and endangered species, receiving an ecological integrity score of 100%, which would make it even harder to site a cell tower. Without a location that meets the CMP for siting a cell tower this site should be taken out of the plan.

PCS-107

This site is located in Estell Manor in the Forest Area. No mining sites, previously disturbed lands, and no structures currently exist. This area includes the Great Egg Harbor Wild and Scenic River boundary. Without an idea of what the company's alternatives might be this location should be removed from plan.

PCS -111

This site is located in Waterford Township in the Rural Development Area. The only commercial or industrial zone in the area is the Atco Raceway. If it is not placed at the raceway, PPA would not be supportive of the area to the east which is Wharton State Forest.

Respectively submitted,

Theresa Lettman
Director for Monitoring Programs