

First Amendment to the 2003 AT&T Local Communications Facilities Plan



CMP Policy and Implementation Committee

February 27, 2026

Presentation Outline

- Overview of CMP LCF regulatory framework
- History of certified LCF plans
- AT&T proposed amendment
- Staff findings
- Conclusion & Next steps

Background on CMP LCF rules

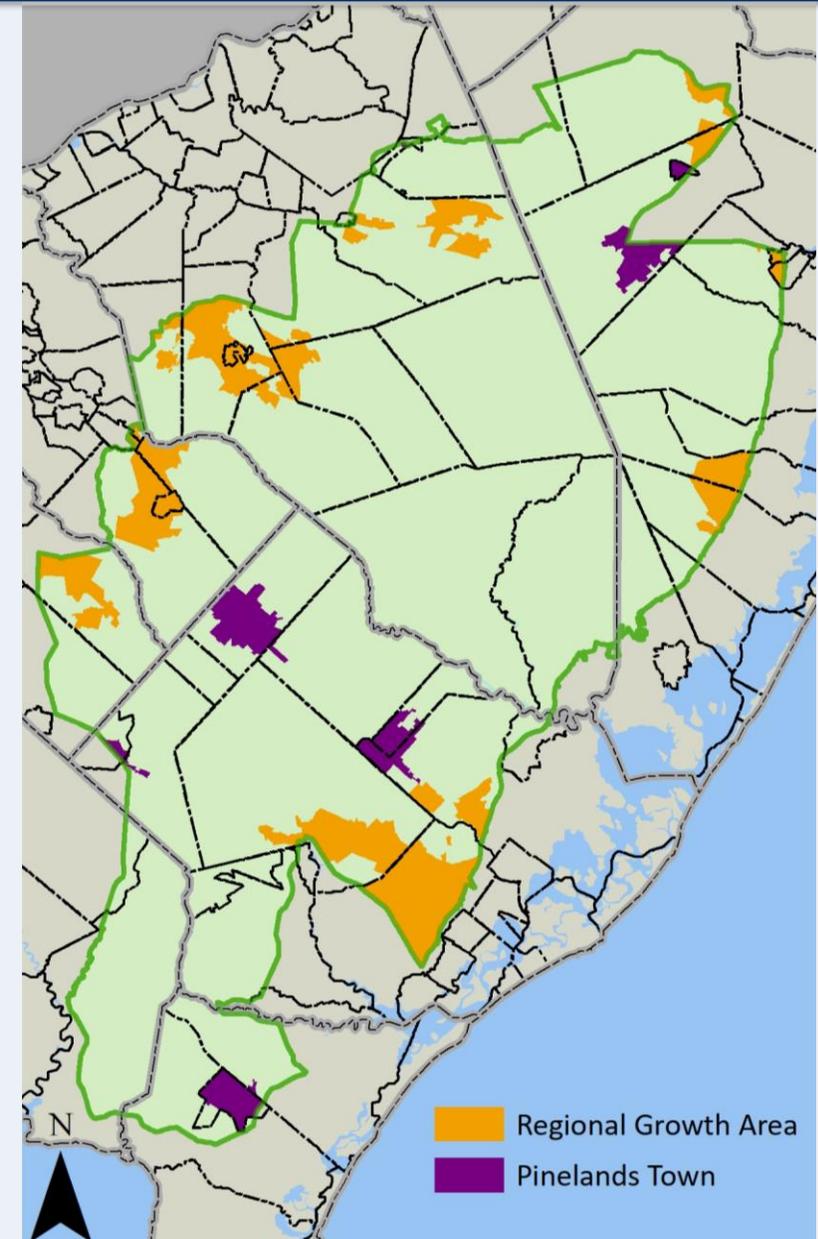
CMP Height Regulations (N.J.A.C. 7:50-5.4)

Purpose

To protect the scenic resources of the Pinelands Area

Height Limits

- Regional Growth Area; Pinelands Towns: No CMP limit
 - Subject to municipal regulations
- Everywhere else: 35-foot limit
 - 89% of the Pinelands Area
 - Some exemptions (accessory antennas, silos, barns, fire towers, church spires...)
 - CMP amended in 1995 to address local communication facilities; previously not exempt



What is a Local Communications Facility?

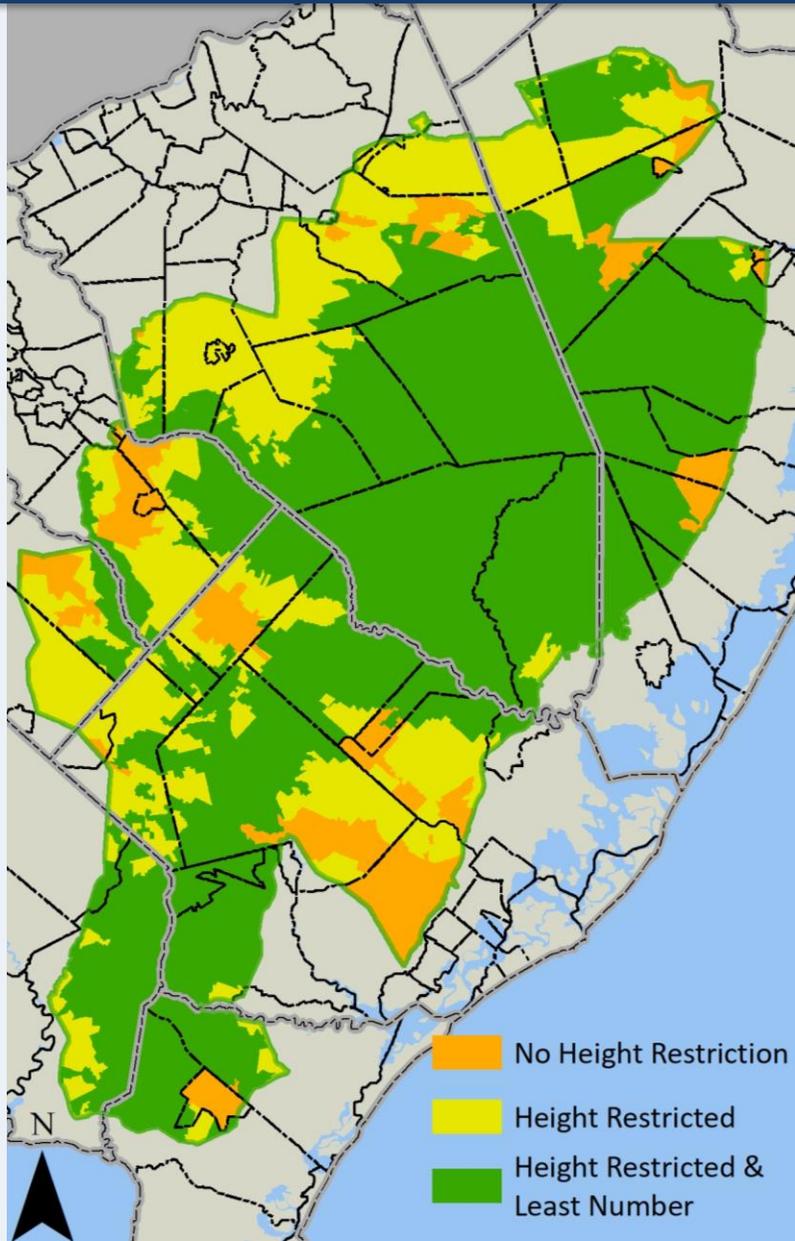
- An antenna and any supporting structure, together with associated accessory facilities
- Intended to serve a limited, localized audience through point-to-point communication
 - Includes cellular telephone facilities, paging systems, and dispatch communications
 - Does **not** include radio or television broadcasting facilities or microwave transmitters



CMP LCF Regulations: Key Principles

- RGA and Pinelands Towns: No height limits
- Everywhere else: LCF structure may exceed 35 feet (up to 200 feet), if:
 - Demonstrated need exists
 - Existing suitable structures are used where practicable
 - New towers accommodate co-location
 - Siting and visual impact standards are satisfied
 - Comprehensive plan is certified

Comprehensive Planning



- Submitted jointly by providers of like service
- Includes 5- and 10-year planning horizons
- Identifies approximate locations of all facilities
- Demonstrates least number necessary in PAD, FA, SAPA, and enumerated Villages
- Requires Commission certification
- Amendments
 - Build upon previously certified network configuration
 - Ensures least number in the PAD, FA, SAPA, and enumerated Villages

Individual Applications for New Towers

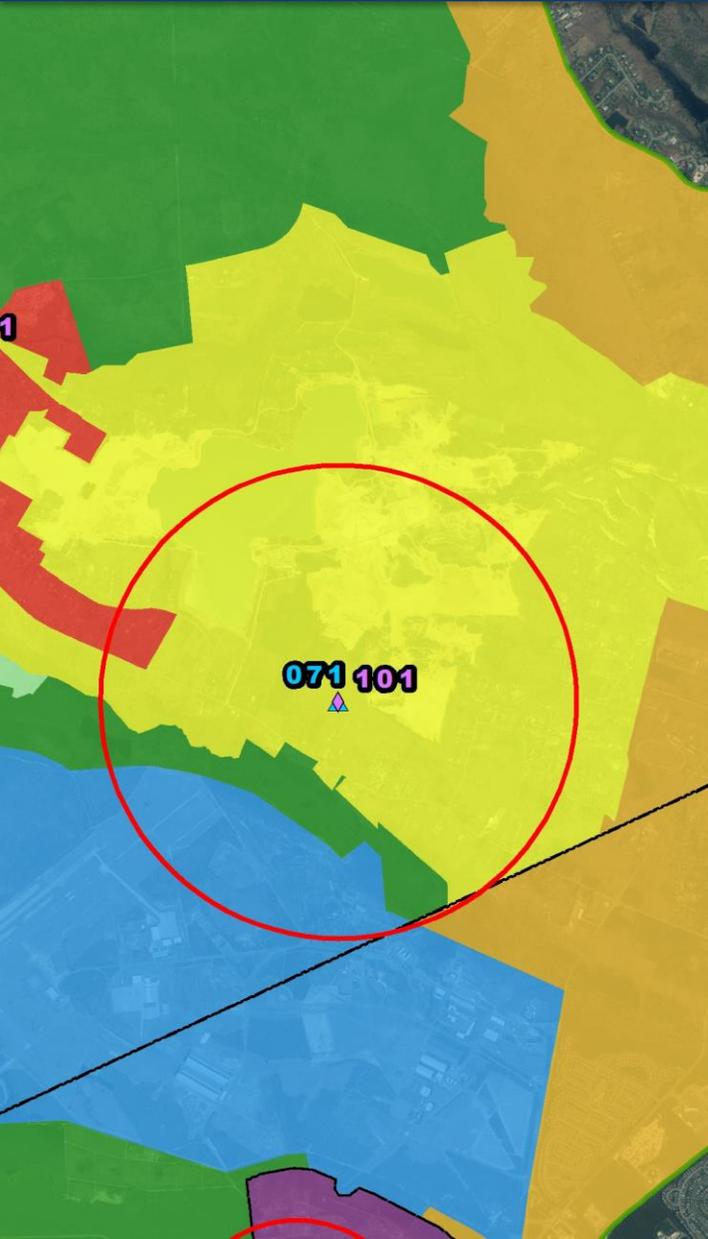
Regional Growth Areas and Pinelands Towns

- Must comply with CMP environmental standards

All other management areas:

- Must comply with:
 - CMP environmental standards
 - Certified comprehensive plan
 - CMP LCF siting and design standards
 - Hierarchical siting policy

Hierarchical Siting Policy Example



- Proposed Site - Jackson Township
 - Previously included in T-Mobile and Sprint Plans
 - 1-mile search radius associated with site
- Hierarchical Siting Policy:
 1. Existing Suitable Structures (within municipality and management area of proposed location)
 2. Existing Suitable Structures (within remainder of the search area)
 3. If no suitable structure is available, new tower sites must comply with CMP standards and follow management area preference

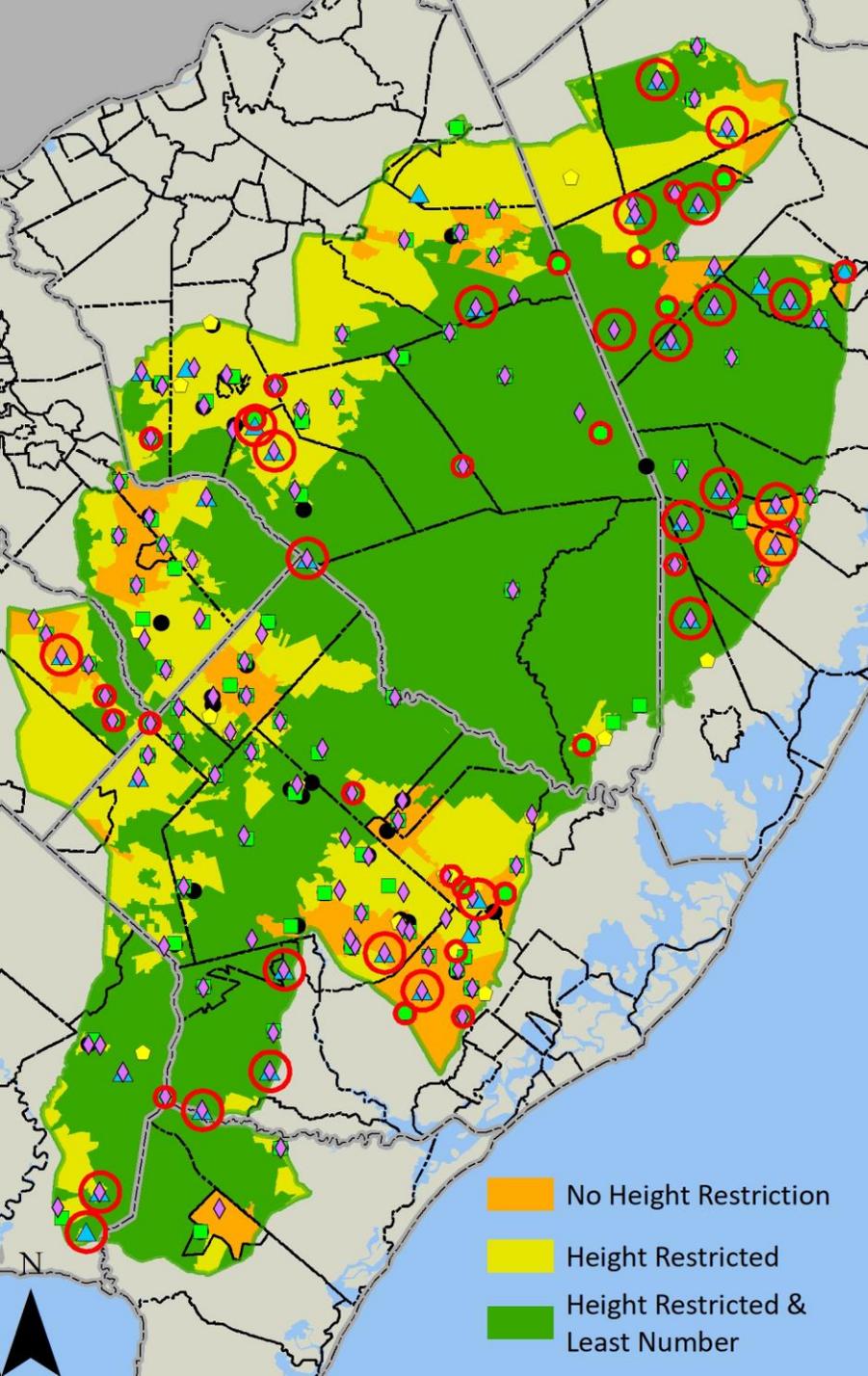
Summary of Certified LCF Plans

Summary of Comprehensive Plans

LCF Plan	Certification Date	Participants
Cellular Plan	9/11/1998	Bell Atlantic Mobile, Comcast, Nextel
PCS Plan	1/14/2000	Sprint, Omnipoint
AT&T Plan	12/12/2003	AT&T
T-Mobile Plan	11/10/2011	T-Mobile
Public Safety Tower Plan	5/11/2012	Pinelands Area Counties
Sprint Plan	11/8/2013	Sprint

Original Provider	Succeeded By
Bell Atlantic Mobile	Verizon
Comcast	Cingular Wireless -> AT&T
Nextel	Sprint -> T-Mobile
Omnipoint	T-Mobile

Sites in Comprehensive Plans



- Cellular Plan (1998)
- ⬠ PCS Plan (2000)
- AT&T Plan (2003)
- ▲ T-Mobile Plan (2011)
- ◆ Sprint Plan (2013)
- Search Areas for Unbuilt Sites

1st Amendment to the AT&T Plan

Background on the Proposed Amendment

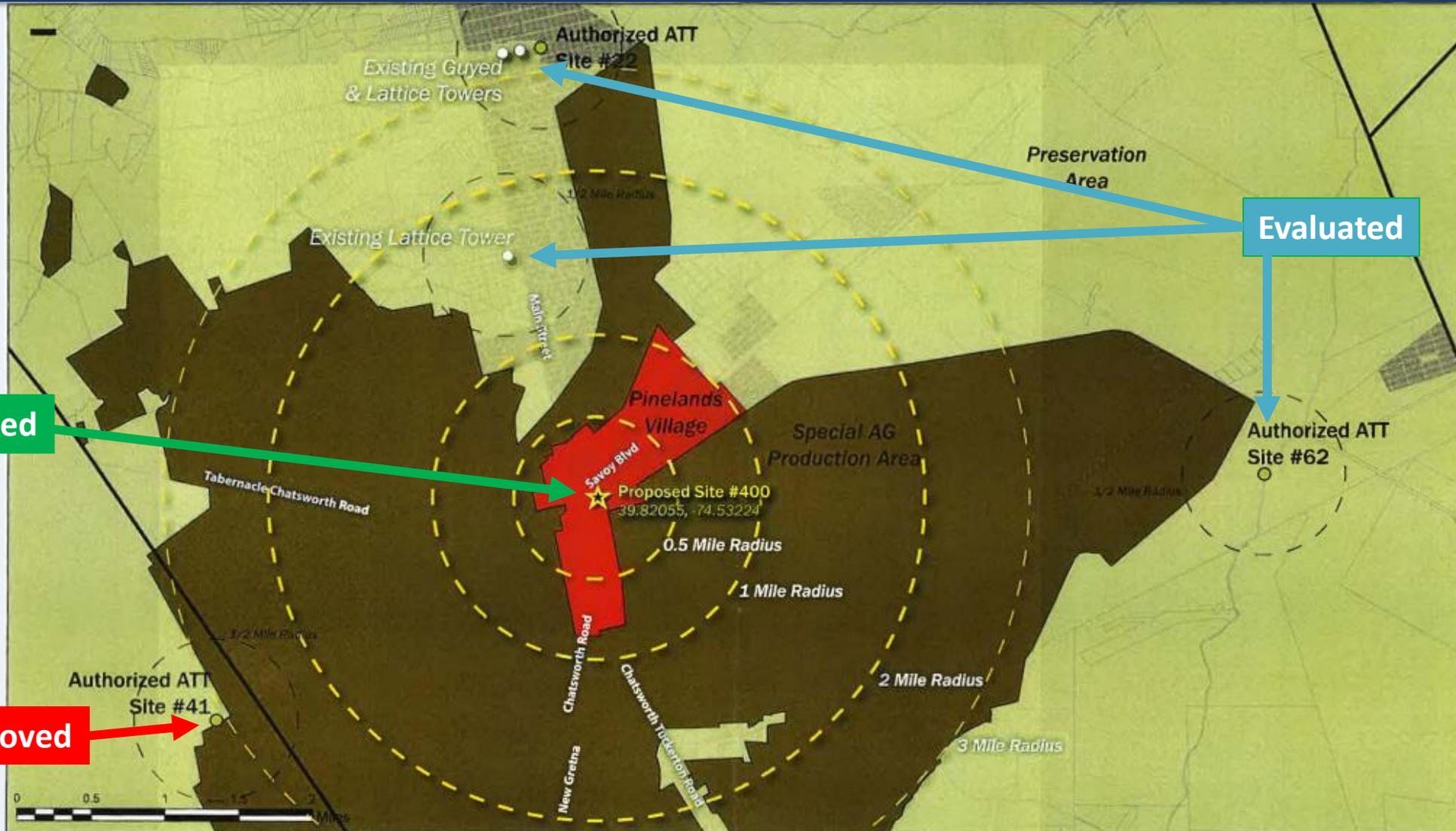
2020 development application

- 120-foot LCF tower
- Proposed at Woodland Volunteer Fire & EMS Station
- CF Issued in July 2020
- Municipal approvals first granted September 2020
- Staff determination:
 - FirstNet antennas do not qualify as an accessory use
 - No existing site in the Village of Chatsworth contained in certified plans

Summary of the Proposed Amendment

- Amends the 2003 AT&T Plan by replacing authorized but unbuilt Site 041 with a new search area identified as Site 400
- The search is centered on Block 4914, Lot 2, located in the Pinelands Village of Chatsworth, Woodland Township
- Maintains the same ½ mile search radius as the previously certified AT&T Plan

Summary of the Proposed Amendment



Site to be added

Site to be removed

Evaluated



Demonstrated Need

- Amendment contains justification with existing coverage maps
- Commission's independent RF consultant confirmed:
 - a coverage gap in the Village of Chatsworth was demonstrated
 - Existing authorized or nearby facilities cannot address the gap; proposed Site 400 would provide necessary coverage

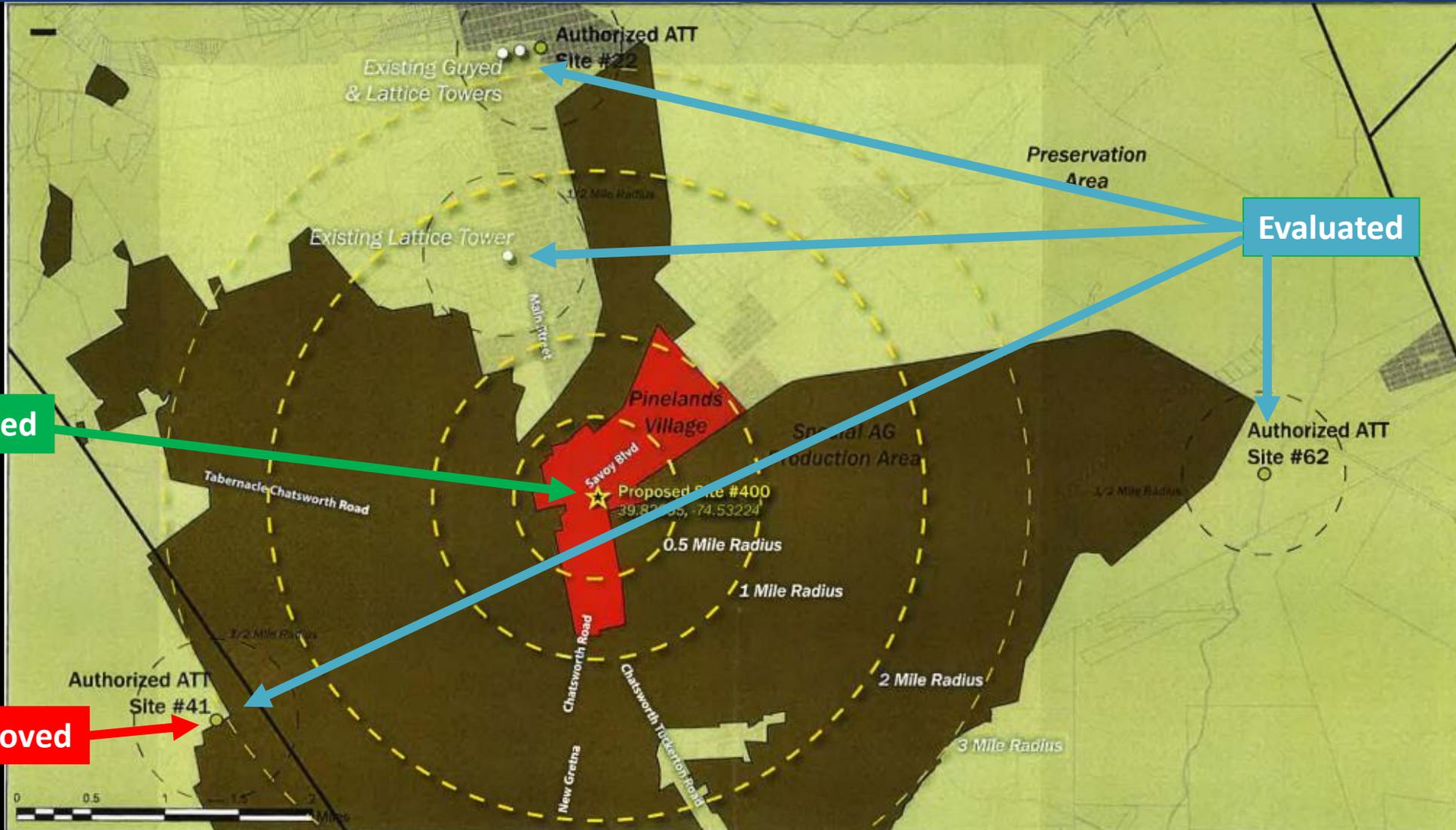
Least Number of Facilities

- CMP requires facilities in PAD, FA, SAPA, and enumerated Villages (including Chatsworth) to be the least number necessary to provide adequate service
 - Amendment does not increase AT&T's total facilities within the Pinelands
 - Replaces previously approved Site 041 (Wharton State Forest) with proposed Site 400, which more effectively addresses the Chatsworth coverage gap

Use of Existing Suitable Structures

- Amendment evaluates nearby towers and tall structures finding that existing structures:
 - Lack sufficient height
 - Are at capacity
 - Their location would not resolve the coverage gap
- Independent RF consultant concurs that co-location at existing nearby communication towers would not provide adequate coverage in Chatsworth
- Similar demonstration will need to be made during application

Summary of the Proposed Amendment



Siting Criteria & Design Standards

- If existing suitable structure cannot be used, a proposed tower must comply with hierarchical siting policy and CMP siting standards
- Amendment identifies locations within the Village likely consistent with CMP siting criteria
- Includes photographic inventory and visual simulations within the Village
- **Certification does not approve a specific tower location**
- Full compliance with hierarchical siting policy, environmental standards, and CMP siting criteria required at application stage

Conclusion & Next Steps

Conclusion & Next Steps

- Staff is recommending certification of the amendment
- Staff is asking the P&I Committee to provide a recommendation to the full Commission on whether to certify the amendment
- Tentatively scheduled for consideration by the full Commission on March 13th

