



RESOLUTION OF THE NEW JERSEY PINELANDS COMMISSION

NO. PC4-26- 04

TITLE: Issuing an Order to Certify the First Amendment to the 2003 AT&T Plan, submitted by New Cingular Wireless PCS, LLC d/b/a AT&T

Commissioner Mauriello moves and Commissioner Irick seconds the motion that:

WHEREAS, on June 16, 1995, the Pinelands Commission adopted amendments to the Pinelands Comprehensive Management Plan, effective August 21, 1995, to allow local communications facilities to exceed the 35-foot height limitation set forth at N.J.A.C. 7:50-5.4, provided that a comprehensive local communications facilities plan for the entire Pinelands Area is submitted to and approved by the Pinelands Commission; and

WHEREAS, on September 11, 1998, the Pinelands Commission approved a comprehensive local communications facilities plan submitted jointly by Bell Atlantic Mobile, Comcast/Cellular One, and Nextel Communications; and

WHEREAS, on January 14, 2000, the Pinelands Commission approved an amendment to the comprehensive local communications facilities plan submitted jointly by Sprint Spectrum, L.P. and Omnipoint PCS Entrepreneurs, Inc.; and

WHEREAS, on December 12, 2003, the Pinelands Commission approved an amendment to the comprehensive local communications facilities plan submitted by AT&T Wireless PCS of Philadelphia, LLC; and

WHEREAS, on November 10, 2011, the Pinelands Commission approved an amendment to the comprehensive local communications facilities plan submitted by T-Mobile Northeast LLC d/b/a T-Mobile; and

WHEREAS, on May 11, 2012, the Pinelands Commission approved the Public Safety Tower Plan submitted by the New Jersey Office of Information Technology in coordination with state and county agencies providing emergency wireless communications services in the Pinelands Area; and

WHEREAS, on November 8, 2013, the Pinelands Commission approved an amendment to the comprehensive local communications facilities plan submitted by Sprint Spectrum L.P.; and

WHEREAS, on November 26, 2025, New Cingular Wireless PCS, LLC d/b/a AT&T submitted the First Amendment to the 2003 AT&T Plan, which the Executive Director deemed complete on December 1, 2025; and

WHEREAS, a public hearing to receive testimony concerning the First Amendment to the 2003 AT&T Plan was duly advertised, noticed and remotely conducted on January 14, 2026, at 9:30 a.m., with a live broadcast on the Pinelands Commission's public YouTube channel and an opportunity for the public to call in during the broadcast; and

WHEREAS, the Executive Director has found that the First Amendment to the 2003 AT&T Plan is consistent with the standards and provisions of the Pinelands Comprehensive Management Plan; and

WHEREAS, the Executive Director has submitted a report to the Commission recommending issuance of an order to approve the First Amendment to the 2003 AT&T Plan; and

WHEREAS, the Commission's CMP Policy and Implementation Committee has reviewed the Executive Director's report and has recommended that the First Amendment to the 2003 AT&T Plan be approved; and

WHEREAS, the Pinelands Commission has duly considered all public testimony submitted to the Commission concerning the First Amendment to the 2003 AT&T Plan and has reviewed the Executive Director's report; and

WHEREAS, the Commission expressly recognizes that approval of this amendment modifies the existing comprehensive planning framework for the siting of local communications facilities, but does not approve any specific application for development of any local communications facility; and

WHEREAS, the Pinelands Commission accepts the recommendation of the Executive Director; and

WHEREAS, pursuant to N.J.S.A. 13:18A-5h, no action authorized by the Commission shall have force or effect until ten (10) days, Saturdays, Sundays and public holidays excepted, after a copy of the minutes of the meeting of the Commission has been delivered to the Governor for review, unless prior to expiration of the review period the Governor shall approve same, in which case the action shall become effective upon such approval.

NOW, THEREFORE BE IT RESOLVED that

1. An order is hereby issued to approve the First Amendment to the 2003 AT&T Plan, submitted by New Cingular Wireless PCS, LLC d/b/a AT&T.
2. The Pinelands Commission expressly affirms that review of any applications for development of the local communications facility authorized by the amendment shall be conducted in accordance with the Executive Director’s Report, dated February 18, 2026, including its appendices, in order to ensure consistency with the requirements of the Pinelands Comprehensive Management Plan.

Record of Commission Votes

	AYE	NAY	NP	A/R*		AYE	NAY	NP	A/R*		AYE	NAY	NP	A/R*
Asselta	X				Lohbauer	X				Rittler Sanchez	X			
Avery	X				Matro	X				Signor	X			
Buzby-Cope			X		Mauriello	X				Wallner	X			
Irick	X				Meade			X		Matos	X			
Lettman			X		Pikolycky	X								

*A = Abstained / R = Recused

Adopted at a meeting of the Pinelands Commission

Date: March 13, 2026



Susan R. Grogan
Executive Director



Laura E. Matos
Chair



State of New Jersey

THE PINELANDS COMMISSION

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LAURA E. MATOS
Chair
SUSAN R. GROGAN
Executive Director

Report on the First Amendment to the 2003 AT&T Plan, Submitted by New Cingular Wireless PCS, LLC d/b/a AT&T

February 18, 2026

Warren O. Stilwell, Esq., on behalf of
New Cingular Wireless PCS, LLC d/b/a AT&T
Cooper Levenson
1125 Atlantic Avenue
Atlantic City, NJ 08401

Findings of Fact

I. Background

In 1995, the Pinelands Commission amended the Pinelands Comprehensive Management Plan (CMP) to address the growing need for wireless communication services within the Pinelands Area. The amendment established a framework for permitting local communications facilities (i.e., wireless communication towers or cell towers) exceeding thirty-five feet in height in management areas outside Regional Growth Areas and Pinelands Towns.

Under this framework, wireless service providers must submit a comprehensive Local Communications Facilities Plan (LCF Plan) identifying all existing facilities within the Pinelands and the approximate vicinity of proposed facilities. The CMP establishes standards governing the Commission's certification of an LCF Plan. Once certified, development of any individual facility included in the plan requires submission of a development application to the Commission. At that time, the applicant must demonstrate that the proposed development satisfies the CMP's minimum environmental standards, complies with the siting standards at N.J.A.C. 7:50-5.4(c), and, when located outside a Regional Growth Area or Pinelands Town, is consistent with a site identified in a certified LCF Plan. To date, six LCF Plans have been certified, as summarized in Table 1 below.

The First Amendment to the 2003 AT&T Plan originated from a 2020 development application (App # 1981-0162.002) for a 120-foot local communications tower proposed as an accessory use to the Woodland Volunteer Fire & EMS Station in the Pinelands Village of Chatsworth, Woodland Township. The tower was intended to provide FirstNet emergency communications service to the station. A Certificate of Filing was issued on July 27, 2020, and municipal approvals were first granted on September 15, 2020.

Table 1. Summary of Approved LCF Plans

LCF Plan	Certification Date	Participants	Search Area Extent (in miles)
Cellular Plan	9/11/1998	Bell Atlantic Mobile, Comcast, Nextel	5
PCS Plan	1/14/2000	Sprint, Omnipoint	0.5
AT&T Plan	12/12/2003	AT&T	0.5
T-Mobile Plan	11/10/2011	T-Mobile	1
Public Safety Tower Plan	5/11/2012	Pinelands Area Counties	3*
Sprint Plan	11/8/2013	Sprint	1

*The search area extent for the Public Safety Tower Plan was amended from 1 mile to 3 miles on July 14, 2017.

During Commission review, a substantial issue arose as to whether the proposed facility qualified as an “accessory structure or use” under the CMP. Since the FirstNet public safety network also transmits commercial wireless service in addition to its priority use for first responders, the proposed tower did not meet the CMP definition of an accessory use. Additionally, no previously certified LCF Plan identified a facility within the Village of Chatsworth. Accordingly, AT&T elected to pursue an amendment to the 2003 AT&T Plan to propose a site within the Village of Chatsworth.

Beginning in 2023, AT&T engaged in discussions with Commission staff regarding an LCF Plan amendment. On June 29, 2023, staff provided preliminary comments on two potential sites and outlined the demonstrations required by the CMP for inclusion in any amendment. On June 18, 2024, AT&T submitted a draft amendment proposing one site in the Village of Chatsworth. On October 29, 2024, Commission staff responded that additional analyses were necessary to demonstrate compliance with CMP standards. A revised draft was submitted on October 3, 2025, and additional staff comments were provided on October 28, 2025. A final draft was submitted on November 26, 2025 (see Exhibit A), and deemed complete on December 1, 2025.

II. Comprehensive Local Communications Facilities (LCF) Plan Amendment

The following document has been submitted to the Pinelands Commission for certification:

- The First Amendment to the 2003 AT&T Plan, submitted by New Cingular Wireless PCS, LLC d/b/a AT&T

A. Summary of the First Amendment to the 2003 AT&T Plan

The proposed amendment to AT&T’s previously certified LCF Plan seeks approval to modify the company’s wireless network configuration within the Pinelands Area by replacing an authorized but unbuilt facility (Site 041) with a new search area identified as proposed Site 400. The search area is centered on Block 4914, Lot 2, located in the Pinelands Village of Chatsworth, Woodland Township. The amendment incorporates all other previously authorized AT&T facilities and does not expand AT&T’s overall tower configuration within the Pinelands. Instead, it substitutes proposed Site 400 for previously authorized Site 041. Consistent with the hierarchical siting policy established as part of the certification of the 2003 AT&T Plan (see Exhibit B), the proposed Site 400 maintains a one-half mile

search area radius. Mapping exhibits, propagation studies, and related documentation support the amendment.

B. Standards for Certification

The proposed amendment has been reviewed to determine whether it conforms to the standards for certification of an amendment to an LCF Plan set forth at N.J.A.C. 7:50-5.4(c)6v. The applicable standards and findings are outlined below.

1. Joint Submission by Providers of the Same Type of Service

N.J.A.C. 7:50-5.4(c)6v requires that a proposed LCF Plan amendment be sent by certified mail to all local communications providers offering the same type of service or holding a franchise within the Pinelands Area for review and comment. AT&T provided proof that notice of the proposed amendment was sent via certified mail to T-Mobile and Verizon, the other wireless providers operating within the Pinelands Area. Both providers are participants of other previously certified LCF Plans. The CMP authorizes the Commission to proceed with review of a proposed LCF amendment if other providers decline to participate. Neither T-Mobile nor Verizon has objected to, or requested to participate in, the current amendment process.

Accordingly, this standard for certification is met.

2. Review of Alternative Technologies

N.J.A.C. 7:50-5.4(c)6 requires that LCF Plan amendments include a review of alternative technologies that may become available for use in the near future. The amendment evaluates Distributed Antenna Systems (DAS), small cell installations, and modifications to existing nearby facilities. It explains that while such technologies may be appropriate in dense or urbanized environments, they are not technically capable of providing the wide-area, macro-cell coverage necessary to serve Chatsworth Village and its surrounding rural road network. In particular, federal requirements associated with the FirstNet public safety network require reliable coverage across broader geographic areas, including heavily forested and sparsely developed portions of the Pinelands.

Accordingly, this standard for certification is met.

3. Approximate Location of All Existing and Proposed Facilities

N.J.A.C. 7:50-5.4(c)6 requires that LCF Plan amendments identify the approximate location of all existing and proposed facilities. The amendment identifies all existing on-air AT&T facilities within the Pinelands and incorporates by reference the previously authorized but unbuilt sites included in the 2003 AT&T Plan, except Site 041. Staff verified that the on-air sites correspond to those listed in the 2003 AT&T Plan. The amendment removes previously authorized but unconstructed Site 041, which was centered on Block 2201, Lot 6 in Tabernacle Township, which is located within Wharton State Forest in the Preservation Area District. The amendment adds proposed Site 400, a one-half mile search area centered on Block 4914, Lot 2 in the Pinelands Village of Chatsworth, Woodland Township.

Accordingly, this standard for certification is met.

4. Five- and Ten-Year Planning Horizons

N.J.A.C. 7:50-5.4(c)6 requires that LCF Plan amendments include five- and ten-year planning horizons. The amendment includes a planning horizon statement indicating that AT&T intends to rely on its existing and previously approved facilities, together with proposed Site 400, to provide commercial wireless and FirstNet emergency communications service over the next ten years. No additional tower sites within the Pinelands Area are proposed beyond proposed Site 400 and those previously authorized under the 2003 AT&T Plan.

Accordingly, this standard for certification is met.

5. Demonstrated Need to Serve Local Communication Needs of the Pinelands

N.J.A.C. 7:50-5.4(c)6 requires that LCF Plan amendments demonstrate *likely consistency* with the requirement that there is a demonstrated need for each proposed facility to serve the local communication needs of the Pinelands, including those related to public health and safety, as well as a need to locate the facility in the Pinelands in order to provide adequate service to meet these needs.

The amendment includes propagation analyses and mapping demonstrating that reliable service at the -95 dBm threshold is not currently available in significant areas of Chatsworth Village and surrounding roadways, and that neither Site 041 nor adjacent facilities can provide adequate coverage to meet the identified need. This coverage is necessary for emergency services operating within and in proximity to the Village of Chatsworth. It should also be noted that the Village of Chatsworth is located far from the boundaries of the Pinelands Area, and, therefore, it is not feasible to provide adequate service to the identified coverage gap from outside of the Pinelands Area.

The Commission's independent radiofrequency consultant reviewed the submitted analyses and concurs that there is demonstrated need for the facility based on a gap in coverage in the Village of Chatsworth that cannot be addressed by existing authorized sites or nearby facilities, and that the proposed Site 400 would satisfy that coverage gap (see Exhibit C).

Accordingly, this standard for certification is met.

6. Least Number of Facilities Necessary

N.J.A.C. 7:50-5.4(c)6 requires that LCF Plan amendments demonstrate that the facilities to be located in the Preservation Area District, the Forest Area, the Special Agricultural Production Area and the seventeen Pinelands Villages enumerated in N.J.A.C. 7:50-5.4(c)6 are the least number necessary to provide adequate service, taking into consideration the location of facilities outside the Pinelands. The Pinelands Village of Chatsworth is among the enumerated Pinelands Villages.

The amendment does not increase the number of AT&T's facilities within the Pinelands. Instead, it eliminates previously approved Site 041 and replaces it with proposed Site 400, which more effectively addresses the gap in coverage that exists in Chatsworth. It is also important to recognize that Site 041 is located in Wharton State Forest in an area that is far removed from the

population that needs to be served and where a host of factors would likely preclude the development of a new tower and the necessary infrastructure to support it. The removal of Site 041 is not anticipated to create a new coverage gap requiring an additional tower.

Accordingly, this standard for certification is met.

7. Use of Existing Communications or Suitable Structures

N.J.A.C. 7:50-5.4(c)6 requires that LCF Plan amendments demonstrate *likely consistency*, and note the need to demonstrate consistency during individual development applications, that existing suitable structures be used to the extent practicable. The amendment documents the evaluation of nearby telecommunications towers and other tall structures. Technical analyses indicate that available structures either lack sufficient height, are at capacity, or would not resolve the identified coverage gap even if modified. The Commission's radiofrequency consultant reviewed these analyses and agreed that co-location on existing structures would not provide adequate reliable coverage in Chatsworth Village (See Exhibit C). It is important to note that any application for the siting of a new tower at proposed Site 400 will require a reevaluation of suitable structures within the one-half mile search area.

Accordingly, this standard for certification is met.

8. Consistency with Siting Criteria for New Structures

N.J.A.C. 7:50-5.4(c)6 requires that LCF Plan amendments demonstrate *likely consistency*, and note the need to demonstrate consistency during individual development applications, that if an existing communications structure or other suitable structure cannot be used, then the antenna and any necessary supporting structure is located to meet the siting criteria contained in N.J.A.C. 7:50-5.4(c)4. Those siting criteria include requirements to minimize visual impacts to certain uses, structures, and specified areas. Additional restrictive siting criteria are provided for sites located outside of Regional Growth Area, Pinelands Towns and Pinelands Villages.

The proposed search area is centered within the Pinelands Village of Chatsworth, which is surrounded by lands within the Preservation Area District and Special Agricultural Production Areas. Areas outside the Village of Chatsworth contain extensive tracts of preserved land, areas of environmental constraints, limited to no lands that meet the siting requirements. However, the amendment identifies sites within the Village of Chatsworth where a tower is likely consistent with CMP siting criteria. The amendment also includes photographic inventory and simulations documenting the visual impacts of a tower proposed on Block 4914, Lot 2.

It is noted that approval of the plan amendment does not constitute approval of a specific tower location or development proposal. Full compliance with the detailed siting hierarchy, visual impact standards, and minimum environmental standards of the CMP must be demonstrated through a subsequent application for development. At the plan level, however, the Commission finds that the amendment demonstrates likely consistency with the siting criteria of N.J.A.C. 7:50-5.4(c)4.

Accordingly, this standard for certification is met.

9. Co-Location, Height Limits, and Joint Construction

N.J.A.C. 7:50-5.4(c)6 requires that LCF Plan amendments acknowledge that support structures must be designed to accommodate other providers with overlapping service areas and must not exceed 200 feet in height. The amendment acknowledges these requirements and indicates that the proposed monopole will be designed to accommodate co-location consistent with CMP standards. The structure will not exceed the 200-foot maximum height and will be capable of accommodating additional carriers where technically feasible.

Accordingly, this standard for certification is met.

10. Plan for Shared Services

N.J.A.C. 7:50-5.4(c)6 requires that LCF Plan amendments include a plan for shared services, unless precluded by federal law or regulation, where such sharing would reduce the number of facilities. The amendment does not include a shared services plan. As stated in the previously certified 2003 AT&T Plan, AT&T maintains that shared services are precluded by federal law. No previously certified LCF Plan has included a shared services plan due to that legal interpretation.

Accordingly, this standard for certification is met.

Public Hearing

A public hearing to receive testimony concerning the First Amendment to the 2003 AT&T Plan was duly advertised, noticed and remotely conducted on January 14, 2026, at 9:30 a.m., with a live broadcast on the Pinelands Commission's public YouTube channel and an opportunity for the public to call in during the broadcast. Mr. Lanute conducted the hearing, which was held remotely and broadcast live on the Pinelands Commission's public YouTube channel. The public was provided the opportunity to call in during the public hearing to provide testimony. No testimony was provided.

Written comments on the First Amendment to the 2003 AT&T Plan were accepted through January 16, 2026. No written comments were received.

Conclusion

Based on the Findings of Fact cited above, the Executive Director has concluded that the First Amendment to the 2003 AT&T Plan complies with Comprehensive Management Plan standards for the certification of an amendment to a certified comprehensive local communications facilities plan. Accordingly, the Executive Director recommends that the Commission issue an order to certify the First Amendment to the 2003 AT&T Plan.

SRG/DBL
Attachments

**NEW CINGULAR WIRELESS PCS LLC D/B/A AT&T FIRST
AMENDMENT TO
TO THE 2003 AT&T PLAN**

1. PLAN INTRODUCTION AND BACKGROUND

This is a proposed amendment by New Cingular Wireless PCS, LLC d/b/a AT&T (hereinafter referred to as AT&T) to amend the comprehensive plans which have been approved by the Pinelands Commission. The approved plans are: a comprehensive plan for Cellular communications providers approved in 1998. The Cellular Plan participants were Bell Atlantic Mobile Systems (succeeded by Verizon Wireless), Comcast/Cellular One (succeeded by New Cingular Wireless PCS, LLC and which acquired AT&T around 2002-2003 and changed the name by which it does its wireless communications business to AT&T), and Nextel (which was merged with Sprint and then its assets acquired by T-Mobile)) The Cellular Plan was amended in 2000 by the PCS Plan. The Cellular and PCS Plans were amended by the AT&T Plan in 2003. The plans were amended in 2011 at the request of T-Mobile. The Plans were amended by Sprint in 2013, and finally, it was amended in 2012 by the Public Safety Tower Plan which was further amended in 2017. Consequently, this proposal by New Cingular Wireless PCS LLC to add One (1) additional site (hereinafter referred to as the Chatsworth Site is the Seventh Amendment to the original Cellular Plan. As with the previous plans and amendments, this proposed Seventh Amendment does not supersede but incorporates all of the prior approved plans and amendments thereto. Even though this is the 7th Amendment to the Cellular Plan, technically it is also the first amendment to the 2003 AT&T Plan. This plan shall therefore be titled the “First Amendment to the 2003 AT&T Plan” (AT&T Amendment) .

This AT&T Amendment is proposing a search area in the Chatsworth Village area of Woodland Township in order to perform two functions. First, to address deficiencies in its coverage in the area to be served by the proposed search area. Second, to provide FirstNet service to the area to be served by the site. FirstNet is the only nationwide wireless communications network that was designed and built specifically for first responders, and the extended public safety community. The FirstNet Authority (a duly created Federal Authority) awarded AT&T a contract to build and manage the Nationwide Public Safety Broadband Network. The radio frequencies dedicated for use by FirstNet can be installed at existing sites by using or slightly modifying the existing AT&T equipment and infrastructure. The FirstNet equipment therefore occupies essentially the same space as the AT&T system and therefore is not a separate system requiring its own comprehensive plan and

Pinelands Commission approval. Also, the search area for FirstNet is the same as for AT&T. The radio frequencies used by the FirstNet system are available for use by AT&T customers unless the FirstNet system is being used by first responders. The first responders take priority on the system. All future sites deployed by AT&T in New Jersey (including the Pinelands) will include and augment the FirstNet network as they are launched. Within the Pinelands specifically, no additional AT&T/FirstNet sites that would require an amendment to the approved wireless carrier plans are deemed necessary at this time. Rather, AT&T will use the proposed Chatsworth site and sites already approved by the Pinelands Commission.

The Chatsworth site is proposed to be located in or near a Pinelands Village (Chatsworth) adjoining the Pinelands Special Agriculture Production Area within Woodland Township. Within this area several candidates conforming to the requirements of the CMP have been located. However, for purposes of the plan we have identified a search area that we reference as "Proposed Site 400." (a/k/a Site 400). Site 400 has been analyzed herein to demonstrate that this proposed amendment is likely to satisfy the requirements of NJAC 7:50-5.4 (c) 3, and 4. AT&T understands that it will be the burden of the developer of a site in the search area to file an appropriate application with the Pinelands Commission and receive all required approvals for the actual site. This includes demonstrating consistency with N.J.A.C. 7:50-5.4(c)2,3,4, and 5. The Exhibits that have been submitted with and incorporated into this AT&T Amendment show Site 400 and demonstrate that there is at least one viable site.

It should also be noted that approved but unbuilt Site 041 is frequently mentioned in this Plan Amendment because it has already been approved and incorporated into several of the Plans that have been adopted including the AT&T Plan. Site 041 has been analyzed for potential use and it has been determined to be unbuildable due to issues with access and constructability and the fact that it is too far from Chatsworth Village to provide an adequate level of service. AT&T has determined that the proposed Chatsworth site eliminates the need for AT&T to utilize site 041 .

The AT&T Amendment includes the following:

1. Each of the sites previously approved by the Pinelands Commission contained in the Cellular Plan and the six amendments that followed. Please note that the Plans/Amendments and supporting documents are on the Pinelands Commission web site and the approved sites contained therein are included herein by reference.

2. Documentation in the form of a list of the sites from which AT&T is providing services in the Pinelands, together with cross references to certain sites approved for the Cellular and PCS plans on which AT&T is collocated designated as Exhibit 1. All of the sites on the list either deploy or are capable of deploying FirstNet service. This list together with the sites in the Plans and Amendments already filed, which are incorporated herein, together with the search area of the one site proposed herein, satisfies the requirement of N.J.A.C. 7:50-5.4 (c)6 to provide the approximate location of all proposed facilities.

3. Radio wave propagation maps. Each of these maps shows the radio wave coverage from either the existing AT&T coverage and/or the proposed coverage to be achieved by Site 400. The coverages are depicted with thresholds of -95 dBm, and -105dBm. Additionally each map has overlaid the outline of the Pinelands designated "Chatsworth Village". Each of the exhibits is designated as follows: Exhibit 2A titled "AT&T Existing Reliable Coverage"; Exhibit 2B titled "AT&T Proposed Reliable Coverage"; Exhibit 2C titled "AT&T Reliable Coverage with Original Site #41"; Exhibit 2D titled "AT&T Reliable Coverage with "Chatsworth" raised to 219' AGL; Exhibit 2E titled "AT&T Reliable Redundant Coverage with "Chatsworth" and adjacent site on-air and both raised to 219" AGL"; Exhibit 2F titled "AT&T Reliable Coverage with "Chatsworth raised to 219' AGL and Site 062 at 200' AGL." Exhibits 2A thru 2F demonstrate that: 1) there is a service coverage gap in the area and, therefore, a need for a site in the area proposed; 2) that existing tall structures in the general vicinity of the search area are not suitable structures for the service coverage needs ; 3) that the two previously approved AT&T sites that have not been built (sites 062 and 041 on the AT&T Plan Amendment) cannot meet the demonstrated coverage need; and, there are no other existing or Pinelands Commission approved sites that could reasonably be used in place of a new site in this area.

4. Exhibits 3A thru 3F. Each of the Exhibits 3A thru 3F is designated and described as follows:

Exhibit 3A/Map A - Existing ATT Site 041/Proposed Site 400 / Site Inventory - 6 Miles

Map A illustrates the Pinelands Management Areas in the +/- 6 mile radius surrounding existing ATT site 041. Developed, on-air sites are primarily

located to the west in the Growth and Development Areas, and Villages. Several unbuilt search areas located to the east, including ATT Site 041, are located in the Special Agricultural Production or the Preservation Areas. Chatsworth Village (Pinelands Village PMA) is located +/- 3 miles to the northeast of ATT Site 041 and is the only Pinelands Management Area other than the Special Agricultural Production or the Preservation Area surrounding ATT Site 041. Exhibit A also shows the approximate location of Site 400 and demonstrates that it is about 2 1/2 miles outside of the 1/2 mile search area of Site 041.

Exhibit 3B/Map B - Existing ATT Site 041/Proposed Site 400 / Open Space Inventory - 6 Miles

Map B illustrates the preserved Open Space in the +/- 6 mile radius in the area of existing AT&T Site 041 and proposed Site 400. The inventory shows a majority of the +/- 5 miles surrounding AT&T Site 041 and Site 400 are located within preserved Open Space Areas. The 0.5 mile search area surrounding AT&T Site 041 is completely located within the Franklin Parker Preserve (to the east) and the Wharton State Forest (to the west). It is important to note the Franklin Parker Preserve was established in 2003, after the ATT Site 041 was originally approved. The proposed AT&T Site 400 is located +/- 3 miles to the northeast of existing AT&T Site 041 in the Village of Chatsworth, outside the areas of preserved open space, and outside the Special Agricultural Production and Preservation Areas.

Exhibit 3C/Map C - Proposed Site 400 / Pineland Management Areas – 3 Miles

Map C illustrates the Pineland Management Areas in the +/- 3 mile radius surrounding proposed AT&T Site 400. The proposed site is central to surrounding authorized sites and centrally located within the Village of Chatsworth. The Pineland Management Areas in the +/- 0.5 mile radius surrounding the proposed AT&T Site 400 are limited to the Village of Chatsworth and the Special Agriculture Production Areas with Preservation Areas expanding beyond the 0.5 mile radius.

Exhibit 3D/ Map D - Proposed Site 400 / Chatsworth Village Zoning - 1 mile

Map D illustrates the designated open space, water bodies, wetlands, and zoning designations within the +/- 1 mile radius surrounding proposed AT&T Site 400 in the Chatsworth Village and Woodland Township. The proposed site is centrally located within the developable areas of the Chatsworth Village. Areas within the 0.5 mile radius surrounding proposed AT&T Site 400 include the only commercial zoning designations; the CN-Neighborhood Commercial and LI-Light Industrial Zoning Districts.

Exhibit 3E/Map E - Proposed Site 400 / Chatsworth Village Zoning & Land Use - 0.5 Mile

Map E illustrates the existing land uses and zoning designations within the +/- 0.5 mile radius surrounding proposed AT&T Site 400 in the Chatsworth Village and Woodland Township. The proposed site is located in Woodland Township's LI-Light Industrial Zoning District adjacent to non-residential and wooded land uses. Several parcels identified with a non-residential land use are located in the 0.25 mile radius surrounding proposed AT&T site 400.

Exhibit 3F/Map F - Proposed Site 400 / Chatsworth Village Zoning & Aerial - 0.25 Mile

Map F illustrates an aerial photograph and zoning designations within the +/- 0.25 mile radius surrounding proposed AT&T Site 400 in the Chatsworth Village and Woodland Township. The proposed location will allow a wireless communications tower to be constructed in a designated commercial and/ or industrial zoning district, on previously developed lands with non-residential land uses, and at a location buffered from residential land uses and roadways with existing, preserved, wooded vegetation.

The Exhibit Maps 3A to 3F demonstrate that a proposed facility in the area of Site 400 is likely to be consistent with NJAC 7:50-5.4C6, and as required therein also demonstrates that a site in the area would likely be consistent with NJAC 7:50-5.4C2,3,and 4 and 5.

5. Attached as Exhibit 4A thru 4J are a Photographic Inventory & Simulations of proposed AT&T Site 400, with a 160-foot Monopole-Wireless Telecommunications Facility. Exhibit 4A is the photographic key map showing a proposed location of Site 400 and the location from which each of the following photographs were taken. Note that in Exhibits 4B, 4C, 4D, and 4E that the heavy growth made it so that viewing of the monopole from these locations was not possible. Instead, a yellow dotted vertical line with a small ball at the top depicts where the monopole would be. The photographs demonstrate consistency with Pinelands regulations 7:50-5.4 (c) 4ii, that the siting minimizes visual impacts from publicly dedicated roads and highways etc. It is also understood that a demonstration will need to be made that the actual site when proposed will adhere to the buffer and setback requirements established in the certified land use ordinance of Woodland Township.

5. Attached as Exhibit 5 is an email from John Kafka of the Burlington County Department of Public Safety, Division Head-Communications Support Division, that advises that the Burlington County radio tower on Canal St., in the Chatsworth section of Woodland Township, is maxed out and has no room to co-locate any other carriers. Consequently it was eliminated from consideration.

NEW JERSEY PINELANDS COMPREHENSIVE PLAN REQUIREMENTS

Pursuant to N.J.A.C. 7:50-5.4(c)6 iv, applicants may propose Amendments to an approved plan from time to time. Such Amendments shall be reviewed by the Commission according to the requirements set forth in subsection (c)6.

N.J.A.C. 7:50-5.4(c)6 provides (in summary): If the (proposed wireless communications) facility is proposed to be located in any Pinelands management area other than a Regional Growth Area or a Pinelands Town, a comprehensive plan for the entire Pinelands Area must be submitted to the Pinelands Commission for certification. Said plan shall also demonstrate that the facilities to be located in

“the...Pinelands Village of...Chatsworth..”, are the least number necessary to provide adequate service. AT&T submits that the information submitted in connection with this Plan Amendment satisfy these requirements.

Based on the information submitted herein AT&T submits that:

- Site 400 as depicted on the Exhibits is located within a Pinelands Village within Woodland Township’s LI (Light Industrial) Zone.
- No visual impacts are expected from the special scenic areas referenced in N.J.A.C. 7:50-5.4(c)4iii. or iv. given the distance of the site from those features.
- There are contiguous parcels to this site containing existing residential dwelling units. However, Woodland Township has not adopted any special buffer or setback requirements for local communications facilities. Therefore, only general setback and buffer standards contained in their code would need to be met for this site in order to satisfy N.J.A.C. 7:50-5.4(c)4v.
- The wetlands that exist in the area are far enough away that they do not negatively impact development.
- The information submitted herein demonstrates that it is likely when an application is submitted for an actual site in this area that it will be consistent with the requirements of the NJAC 7:50-5.4 et. seq.

The Applicant recognizes that an application for a site in this area will need to provide the required information for the specific site for which the application is made. The following is information intended to demonstrate that this plan satisfies the requirements of the NJAC 7:50-5.4 et seq.

DEMONSTATION OF NEED/SEVICE GAP

Exhibits 2A-2G graphically show the AT&T existing and proposed coverage in the area of Site 400. AT&T engineers have determined that -95dBm and 105 dBm are signal strengths that will be able to provide reliable data/streaming services, voice services and FirstNet service which will satisfy necessary criteria for reliable service such as covering population centers, and connecting to adjacent sites so that there are no breaks in the coverage, and affording greater coverage to areas for use by First Responders. Exhibit 2A shows that there is a gap in the existing coverage. Exhibit 2B has added the coverage that will be achieved from the proposed site 400.. The coverage to be achieved from the Site 400 clearly fills in the gap that exists in this area. Which includes the more populous area of the Village of Chatworth, the major roads, and a significantly large area that will benefit from enhanced public safety. .

DEMONSTRATION THAT EXISTING TALL STRUCTURES ARE NOT SUITABLE TO PROVIDE ADEQUATE SERVICE

Exhibit 3A shows all of the sites surrounding the proposed Chatsworth site 400. There are two sites shown that are not providing any service. The first such site is the “Burlington County Guyed Tower at -39.84763, -74.70292”. This site is also on the Public Safety Tower Plan as “Chatworth” and is shown as such on Exhibits 3A and 3B. With respect to this tower, inquiries were made to Burlington County as to the availability of space on that tower. John Kafka, Dept. of Public Safety, Division Head-Communications Support Division in his email of August 10, 2023, attached as Exhibit 5, advised that the Tower is filled to capacity and he lists the entities occupying the space. Mr. Kafka advises “...we have no room to co-locate any other carriers.” The second such site is the “Fire Tower located at -39.807354, -74.589299. The fire tower is over 3 miles from the Chatworth search area, in the middle of open preserved space. The fire tower was deemed unsuitable because of its distance from the area of need and because it could not be serviced by power or telco due to open space restrictions. Exhibit 2A also shows all of the other existing sites in the area and the radio wave propagation from each. None of the sites is capable of providing reliable coverage to the Chatsworth area. Of note is that Exhibit 2D and E show the site identified

as “ATC 222’ Guyed tower -3986444, -74.53968. It so happens that there are two towers in close proximity to each other at this site. AT&T is already on one of the towers, and the other tower would provide redundant coverage. Exhibit 2D and E demonstrate that even if AT&T were able to raise the height of its antennas to 219’ on either of these towers, that the coverage would still not be adequate to provide reliable service in the Chatsworth Village area. The conclusion is that there on no suitable existing tall structures that can be used to provide adequate service.

DEMONSTRATION THAT EXISTING APPROVED AT&T SITES 041 AND 062 CANNOT MEET THE DEMONSTRATED NEED

ANALYSIS OF SITE CP 006 / PCS 041 / ATT 041

Site CP 006 / PCS 041 / ATT 041 is located west of the municipal boundary between Woodland and Tabernacle Township in Burlington County. The site is located south of New Gretna Chatsworth Road and Speedwell Place Road, both of which are unimproved roadways at Lat. 39.797; Long. -74.581. The approved site is located on the boundary of the Pinelands Preservation Area and the Pinelands Special Agricultural Production Area.

AT&T’s Professional Planner, Brian Seidel, drove the area for both site 041 and 062. Mr. Seidel found that the approved site location for 041 is very rural and generally undeveloped. Apple Jack Road is the closest improved roadway, located approximately 1.4 miles to the northeast of the approved site location. Two residential properties were identified on Apple Jack Road. A tower has not been constructed in this location. Site CP 006 / PCS 041 / ATT 041 was eliminated from consideration due to the distance from the intended RF coverage area and the lack of available utilities. A coverage map Exhibit 2C is attached showing that the coverage from 041 is not sufficient to eliminate the need for the proposed site. Finally as has been previously stated herein AT&T has determined that the proposed Chatsworth site eliminates the need for AT&T to utilize site 041.

ANALYSIS OF SITE PCS 062 / ATT 062

Site # PCS 062 / ATT 062 is located southwest of NJ Highway 73 just south of the intersection of NJ Highway 73 and Lauries Road on an unimproved dirt road at Lat. 39.822; Long. -74.448.

The previously approved site PCS 062 / ATT 062 is located approximately 4.0 miles to the east of site 400. It is located within the P-P Pinelands Preservation Area of Woodland Township, Burlington County. A tower has not been constructed in this location.

The PCS 062 / ATT 062 location is very rural and generally undeveloped. State Highway 72 is the closest improved roadway, located approximately 0.4 miles to the northeast of the approved site location. No developed properties were observed within 1.0 mile of the approved location. Site PCS 062 / ATT 062 was eliminated from consideration due to the lack of population, the distance from the intended RF coverage area, and the lack of available utilities. A coverage map Exhibit 2F is attached showing that the coverage from 062 is not sufficient to eliminate the need for the proposed search area.

DEMONSTRATION THAT THE SITING REQUIREMENTS OF NJAC 7:50-5.4 (C) 4vii REQUIRING SITING AT THE LOCATON WHICH WILL HAVE THE LEAST VISUAL IMPACT ON THOSE USES AND RESOURCES DESCRIBED IN 4ii, 4iii, AND 4v.

As set forth above, the attached Exhibits 4A thru 4J demonstrate that the antenna and supporting structure can be sited at the location that is consistent with the locational requirements of N.J.S.A 7:50-5.4(C)vi. This Plan Amendment recognizes that it will be the Applicants burden to demonstrate satisfaction with the Pinelands regulations at the time that an application is made for Pinelands approval of a specific site. AT&T has provided information herein to demonstrate that at least one site does satisfy the requirements cited in 7:50-5.4(c)4 ii, iii, and v. As support for this statement that at least one site satisfies N.J.A.C. 7:50-5.4 (c)4ii, please see Exhibits 4A thru 4J.

As support that the plan satisfies the requirements of N.J.S.A. 7:50-5.4 (c)4iii, Mr. Seidel advises:

The Pine Plains are located approximately 9 miles to the east of the proposed site. (Site 400). N.J.A.C. 7:50-6.105(a) designates 'wild and scenic' rivers and requires structures within 1,000 feet of the centerline of these identified rivers to be 'designed to avoid visual impacts' as viewed from these rivers. There are no designated wild and scenic rivers within 1,000 feet of the proposed facility. The closest identified resource to the proposed facility is 'The Wading River-Confluence with the Mullica River to Route 263 Crossing at Speedwell', which is located 3.8 miles to the south to the subject property

As support that the plan satisfies the requirements of N.J.S.A. 7:50-5.4 (c)4v, we note that Site 400 is of sufficient size to be able to comply with all buffer and setback requirements. At the time that an actual application is made the plans and drawings in support of the application will demonstrate compliance

FUTURE SITE LOCATIONS / 5-10 YEAR HORIZON PLAN

Pursuant to N.J.A.C. 7:50-5.4 (c) 6, the Plan shall provide 5 and 10 year horizons for future FirstNet/AT&T site locations. FirstNet communications service is provided through AT&T's wireless network, therefore, the provided inventory of existing and Pinelands Commission approved site locations will be utilized and prioritized over the next 5-10 years to provide AT&T as well as FirstNet service. It is also worth repeating in regard to the 5 and 10 year Plan: All future sites deployed by AT&T in New Jersey (including the Pinelands) will include and augment the FirstNet network as they are launched. Within the Pinelands specifically, no additional AT&T/FirstNet sites that would require an amendment to the approved wireless carrier plans are deemed necessary at this time. Rather, AT&T will use the proposed Chatsworth site and sites already approved by the Pinelands Commission.

Review of Alternate Technologies that may become available for use in the near-future N.J.A.C. 7:50-5.4 (c)6

As set forth by each of the Plans and Amendments approved by the Pinelands Commission, the primary alternatives to building sites using towers capable of being extended to 200' are Distributed Antenna Systems technology, a/k/a DAS and small cell technology. Neither system is considered reliable in an environment that covers large open spaces, forests and waterways. While DAS systems can be used outdoors, they are generally deployed to provide improved INBUILDING service. The radio frequency coverage from a DAS system is directed along the road on which it is placed and each site only covers a very limited distance (a thousand feet or so). Similarly, a small cell also has a very small RF footprint. Such systems would not achieve coverage goals for FirstNet which needs the ability of a macro site to cover areas of 2 mile radius or more so that first responders can fight fires and respond to emergencies far from roads. Further, many areas of the Pinelands do not have sufficient number and placement of existing structures, such as utility poles, to accommodate a DAS or small cell deployment. Also, the CMP regulations regarding ground disturbance as well as environmental factors involving various species, plants and wild and scenic areas also make DAS and small cells impractical. Finally small cells are also, in many instances, on small towers and would be subject to all of the same regulations as set forth in the CMP.

Approximate location of all proposed facilities per N.J.A.C. 7:50-5.4 (c)6

Attached as Exhibit 1 is a list of all of the sites on which AT&T is located and which have or are capable of having FirstNet service located thereon. This list together with the sites approved in the Plans and Amendments already approved by the Pinelands Commission which are incorporated herein, together with the location of the one site proposed herein, satisfies the requirement of N.J.A.C. 7:50-5.4 (c)6 to provide the approximate location of all proposed facilities.

Co-Locations

AT&T has in the previous plans already agreed to abide by the requirement to provide co-location. AT&T also agrees to allow co-location in accordance with its prior representations to the proposed Chatworth tower.

Conclusion

The addition of one site, in the Chatsworth area, to the existing Plans in which AT&T or its predecessors in interest have participated is consistent with those Plans and satisfies the requirements set forth in N.J.A.C. 7:50-5.4 et seq. This Amendment has the added benefit of allowing FirstNet service to be deployed in the

Chatsworth Village area thereby enhancing the public health and safety of the entire area.

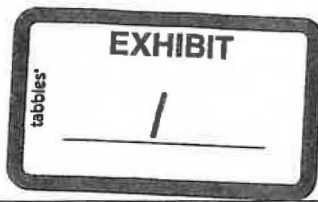
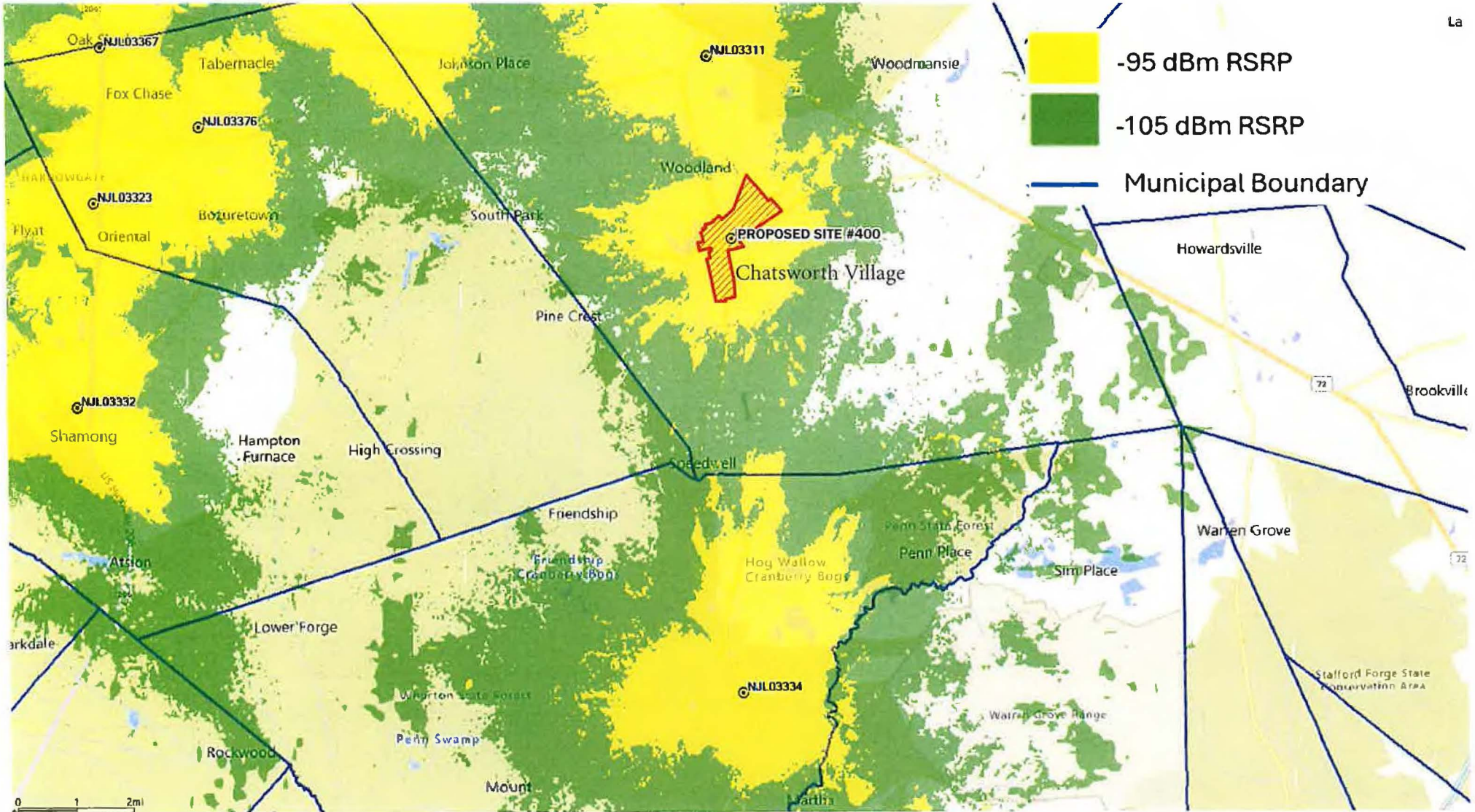


Exhibit 1: Existing AT&T On-Air Sites

September 2025

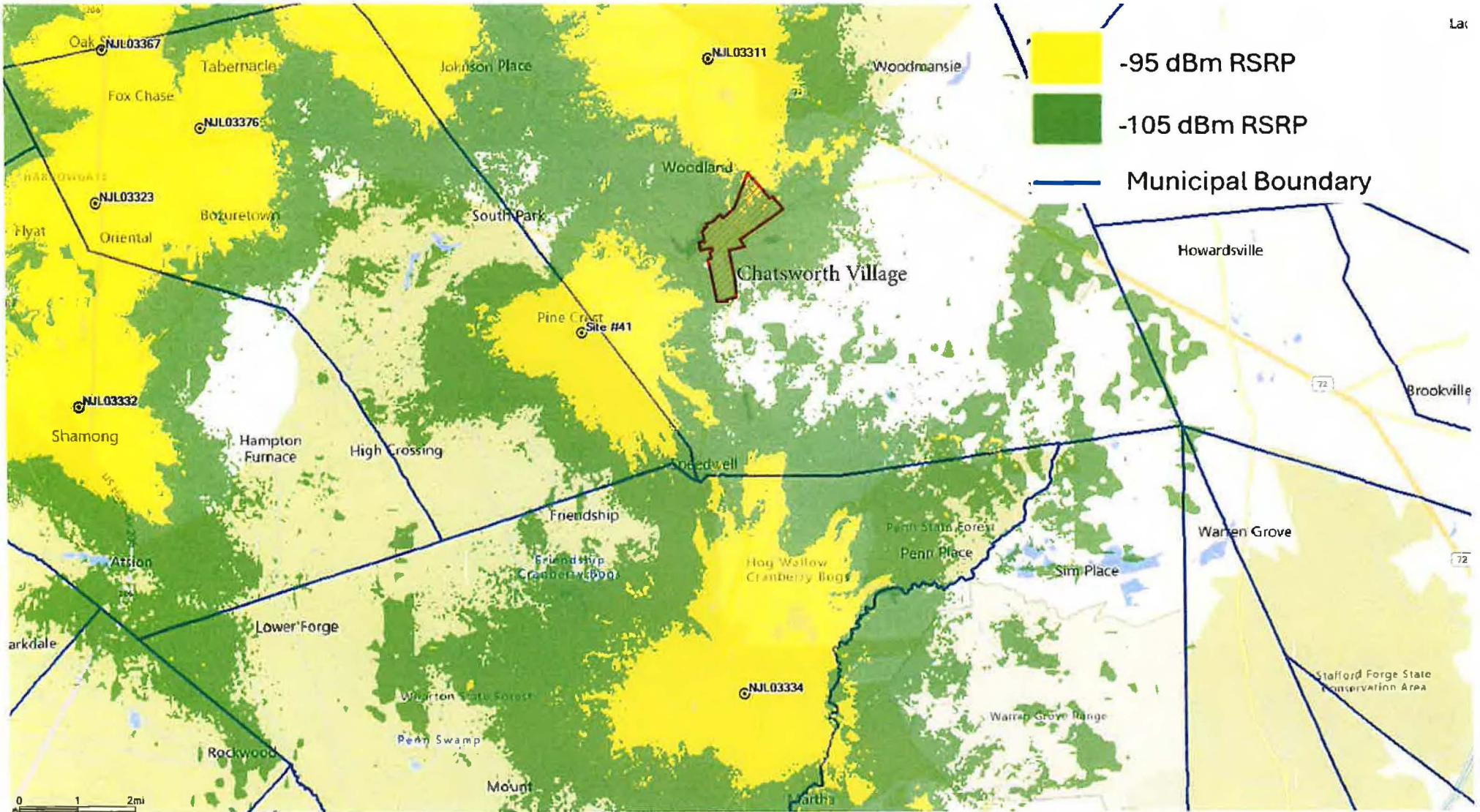
Latitude	Longitude	Name	PCS Plan	Cellular Plan	ATT Plan
39.64680	-74.939883	CECIL	1	30	1
39.74417	-74.911940	WILLIAMSTOWN JUNCTION	2		2
39.51903	-74.692894	LAURELDALE HAMILTON	7	17	7
39.48111	-74.849194	MIZPAH	11	34	11
39.56580	-74.817000	PENNY POT	14		14
39.89667	-74.593389	WOODLAND	20		20
39.86442	-74.539667	CHATSWORTH	22	41	22
39.77902	-74.742394	ATIONS	23	11	23
39.86503	-74.809190	MEDFORD LAKES	27	8	27
39.70792	-74.530678	JENKINS	29	25	29
39.67108	-74.773831	DUTCHTOWN	30	12	30
39.62232	-74.645519	BATSTO	31	16	31
39.40050	-74.826700	DOROTHY NJ	32	35	32
39.79639	-74.370280	BARNAGET	35	5	35
39.95667	-74.379170	MANCHESTER	39	24	39
39.47920	-74.698303	MAYS LANDING EAST	43		43
39.72266	-74.858325	WATERFORD WORKS	47		47
39.63300	-74.806000	HAMMONTON NORTH	48		48
39.71556	-74.291940	STAFFORD	59	42	59
39.40605	-74.571180	SHORE MALL		19	300
39.44724	-74.573086	ATLANTIC CITY AIRPORT			304
39.43860	-74.683603	BABCOCK ROAD		50	308
39.45281	-74.746270	MAYS LANDING			309
39.57612	-74.865650	CEDAR LAKE NJ		14	310
39.44883	-74.631508	EXIT 12 AC EXPWY			313
39.48935	-74.533261	STOCKTON UNIVERSITY SOUTH			315
39.48310	-74.651700	HAMILTON TOWNSHIP			322
39.98770	-74.551803	HANOVER FURNACE			328
39.82958	-74.736366	TABERNACLE		26	331
39.87967	-74.647354	BURRS MILL		7	332
39.95298	-74.551109	Mt Misery			336
39.84529	-74.829040	TAUNTON LAKE		28	337
39.85708	-74.870750	KINGS GRANT	26	44	338
39.60503	-74.433920	GREENBUSH			340
39.78483	-74.911700	BERLIN TOWNSHIP			343
39.75371	-74.882797	ATCO		29	344
39.70740	-74.895103	BRADDOCK			348
39.28657	-74.754722	TUCKAHOE		51	352
39.60376	-74.755250	SWEETWATER NJ			363
39.84780	-74.702500	EAST TABERNACLE			364
39.73780	-74.869400	CHESILHURST			366
39.42108	-74.584140	PLEASANTVILLE WEST		56	371
39.36318	-74.927675	HUNTERS MILL		21	372
39.61530	-74.855003	CE WATER TANK			373
39.90222	-74.822778	MEDFORD	45	43	
39.24201	-74.813578	WOODBINE			
39.48621	-74.600130	POMONA NJ			
39.54703	-74.638194	EGG HARBOR		33	
39.55528	-74.746392	ELWOOD		31	
39.61750	-74.820556	HAMMONTON		46	
39.67875	-74.869806	BLUE ANCHOR		45	
39.68142	-74.994000	WILLIAMSTOWN			
39.77397	-74.828854	PARKDALE			
39.86732	-74.733798	TANGLEWOOD			
39.96889	-74.590833	BROWNS MILLS		40	
40.00120	-74.623300	FORT DIX			

AT&T Proposed Reliable Coverage



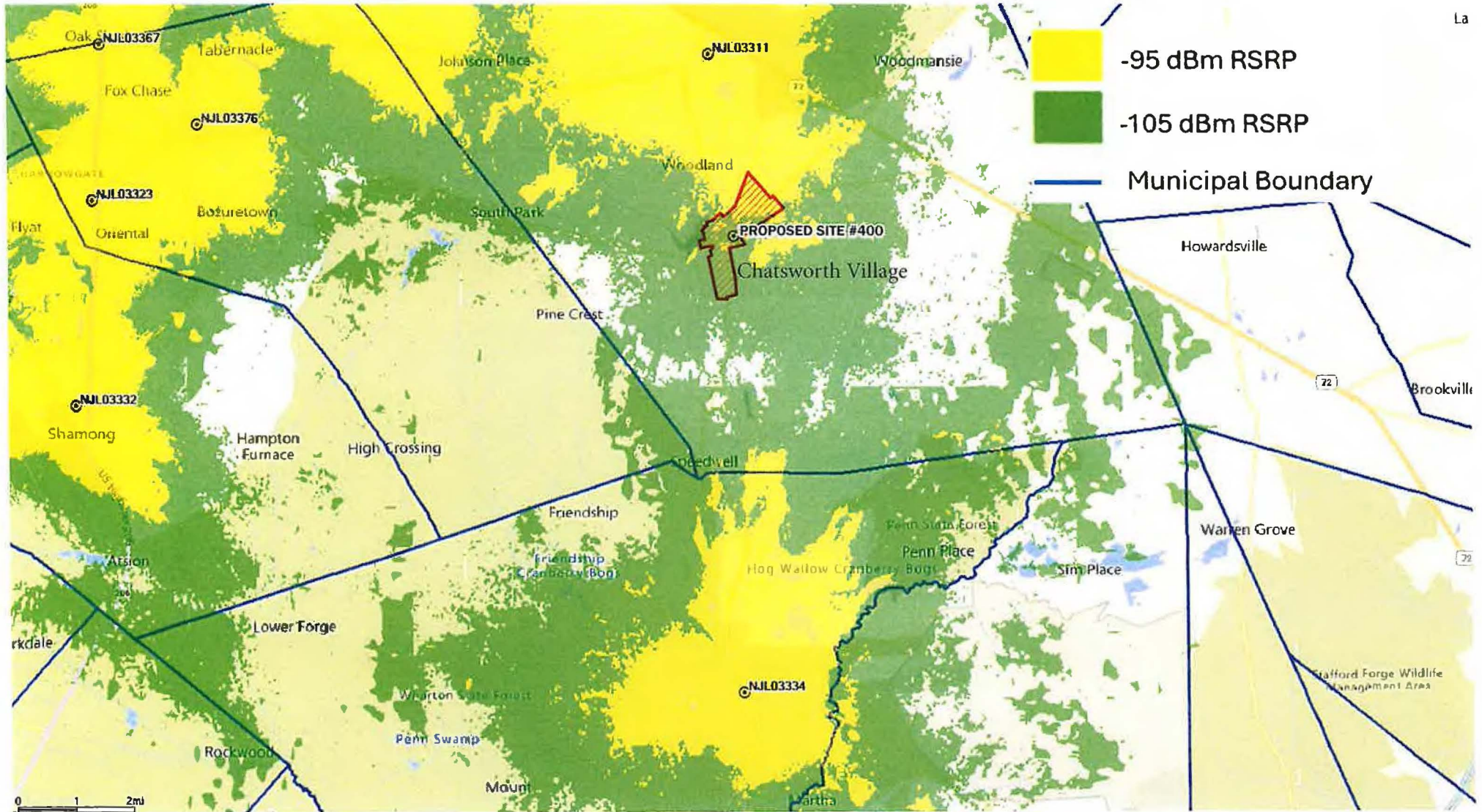
PO Box 165
Fairview Village, PA 19409
Phone: 610.304.2024
info@dBmEng.com

AT&T Reliable Coverage with Original Site #41



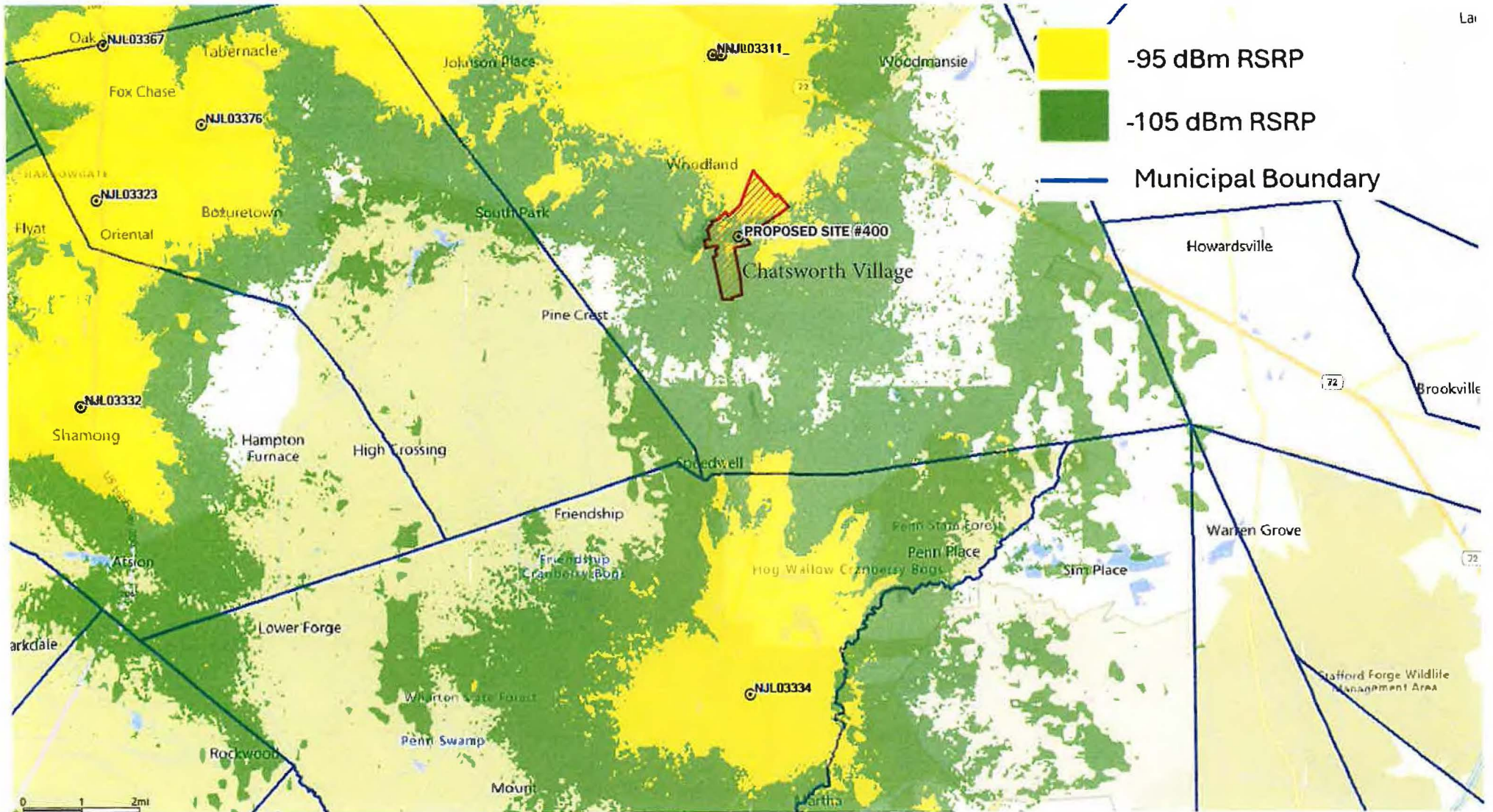
PO Box 165
Fairview Village, PA 19409
Phone: 610.304.2024
info@dBmEng.com

AT&T Reliable Coverage with "Chatsworth" raised to 219' AGL



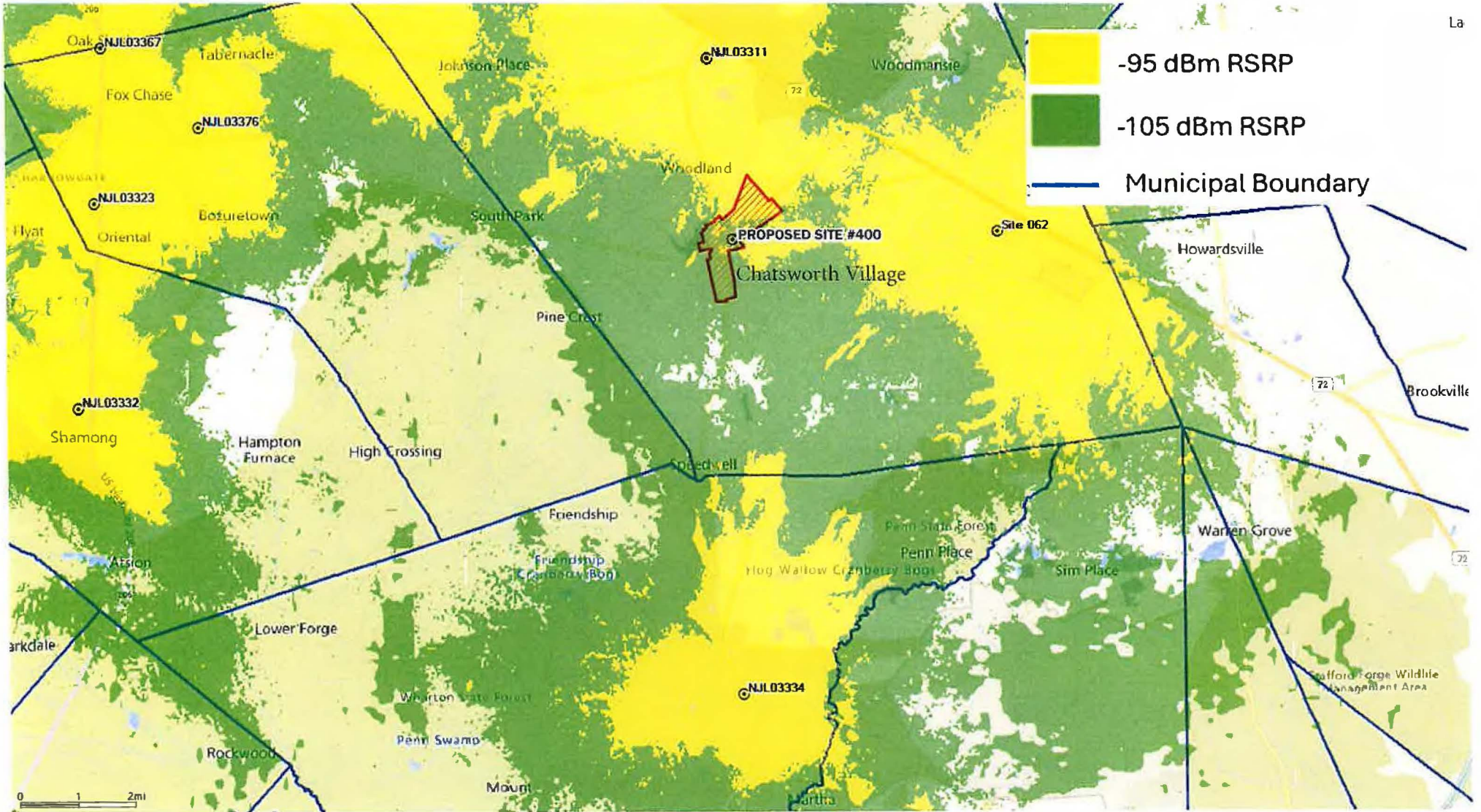
PO Box 165
Fairview Village, PA 19409
Phone: 610.304.2024
info@dBmEng.com

AT&T Reliable Redundant Coverage with “Chatsworth” and adjacent site on-air and both raised to 219’ AGL

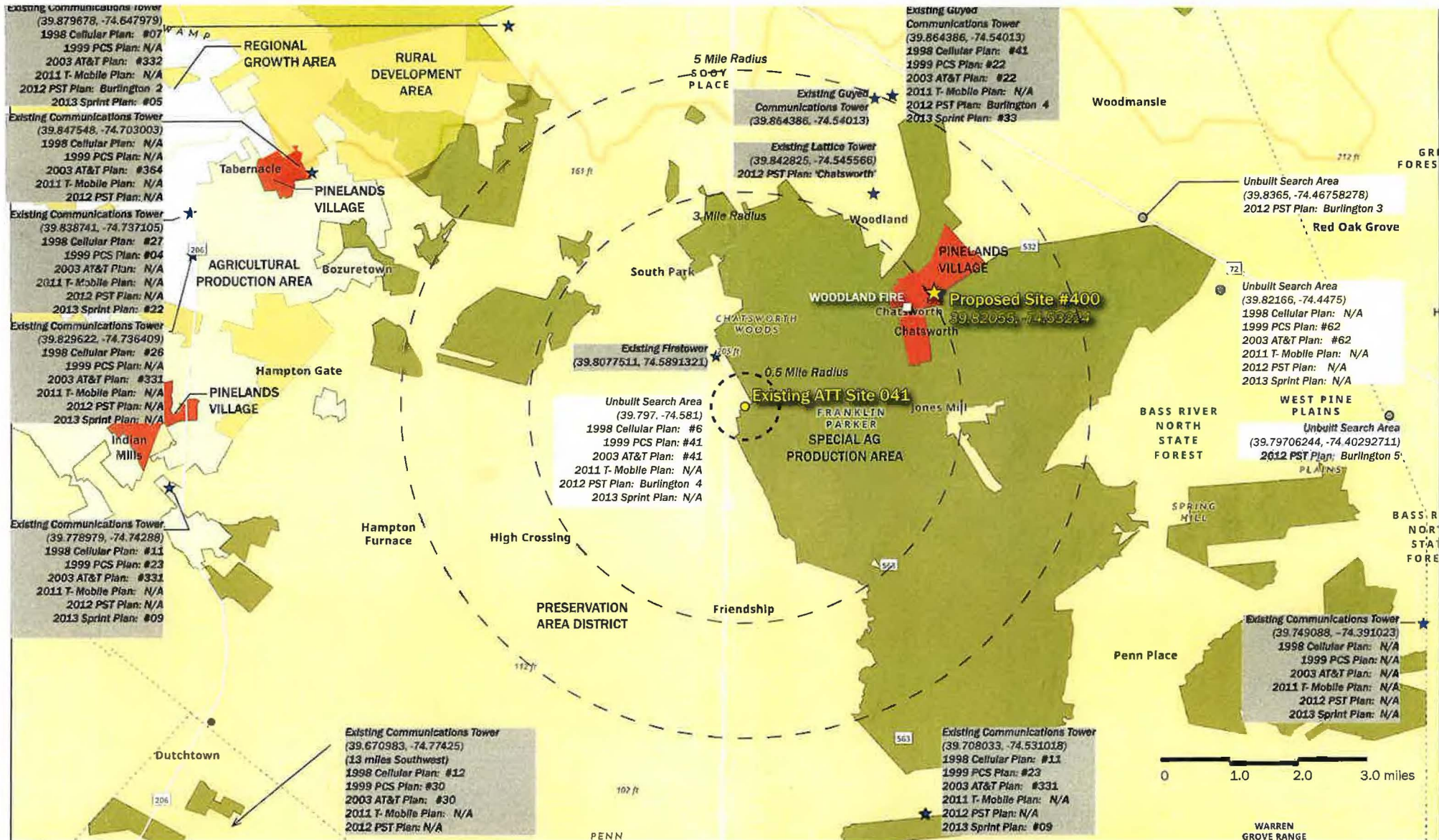


PO Box 165
Fairview Village, PA 19409
Phone: 610.304.2024
info@dbmEng.com

AT&T Reliable Coverage with “Chatsworth” raised to 219’ AGL and “Site 062” at 200’ AGL



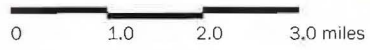
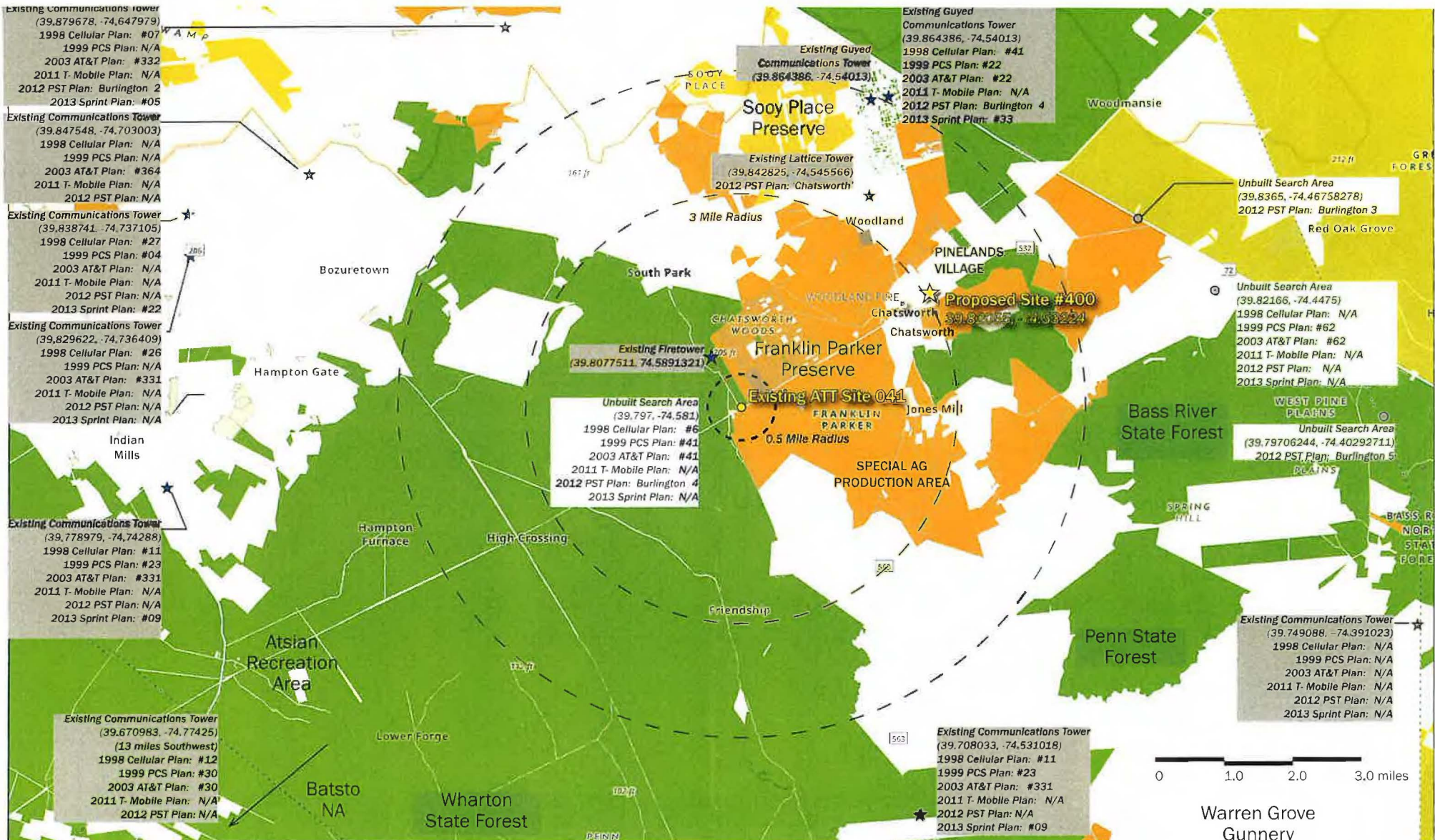
PO Box 165
Fairview Village, PA 19409
Phone: 610.304.2024
info@dBmEng.com



Map A - Existing ATT Site 041/ Proposed Site 400/ Site Inventory - 6 Miles
 Woodland Township, Burlington County, NJ
 September 25, 2025

EXHIBIT
 3A

- Graphics Key
- ★ Existing Facilities and Tall Structures
 - Unbuilt Search Areas



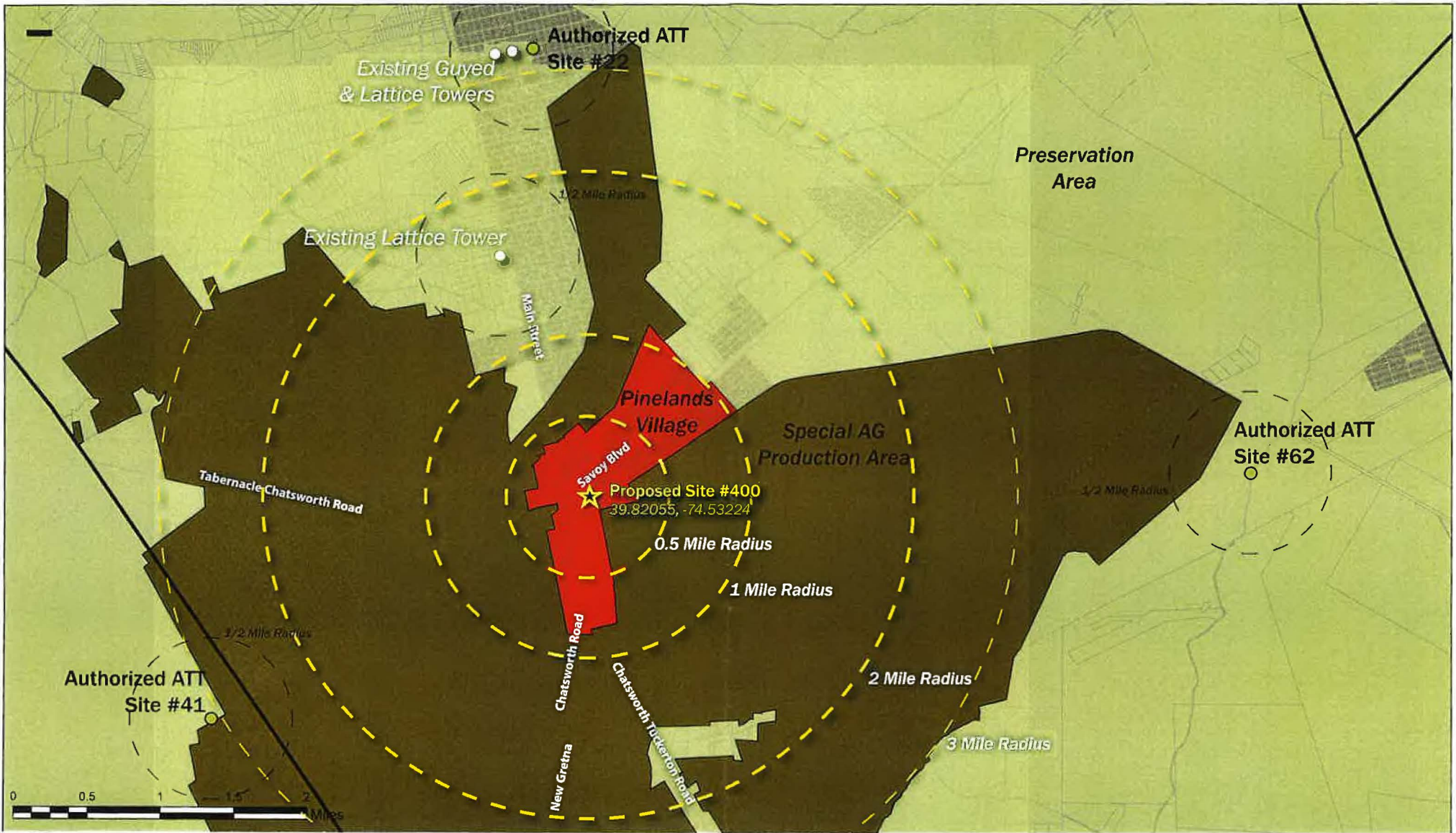
Warren Grove Gunnery

- Graphics Key
- ★ Existing Facilities and Tall Structures
 - ⊙ Unbuilt Search Areas



Map B - Existing ATT Site 041/ Proposed Site 400/ Open Space Inventory - 6 Miles
 Woodland Township, Burlington County, NJ
 September 25, 2025

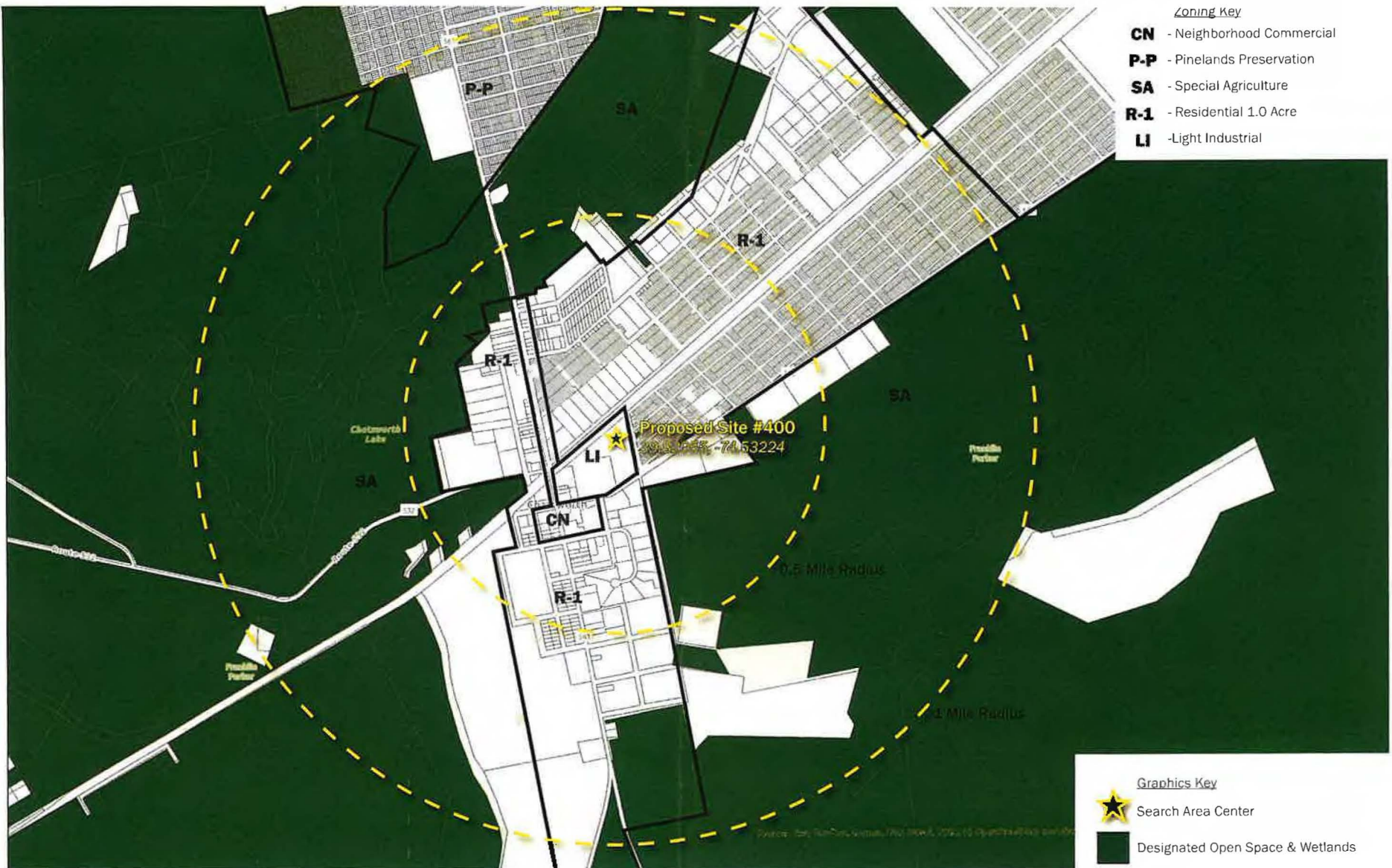
EXHIBIT
 3 B



Map C - Proposed Site 400/ Pineland Management Areas - 3 Miles
 Woodland Township, Burlington County, NJ
 September 25, 2025

EXHIBIT
 3C

- Zoning Key
- CN** - Neighborhood Commercial
 - P-P** - Pinelands Preservation
 - SA** - Special Agriculture
 - R-1** - Residential 1.0 Acre
 - LI** - Light Industrial

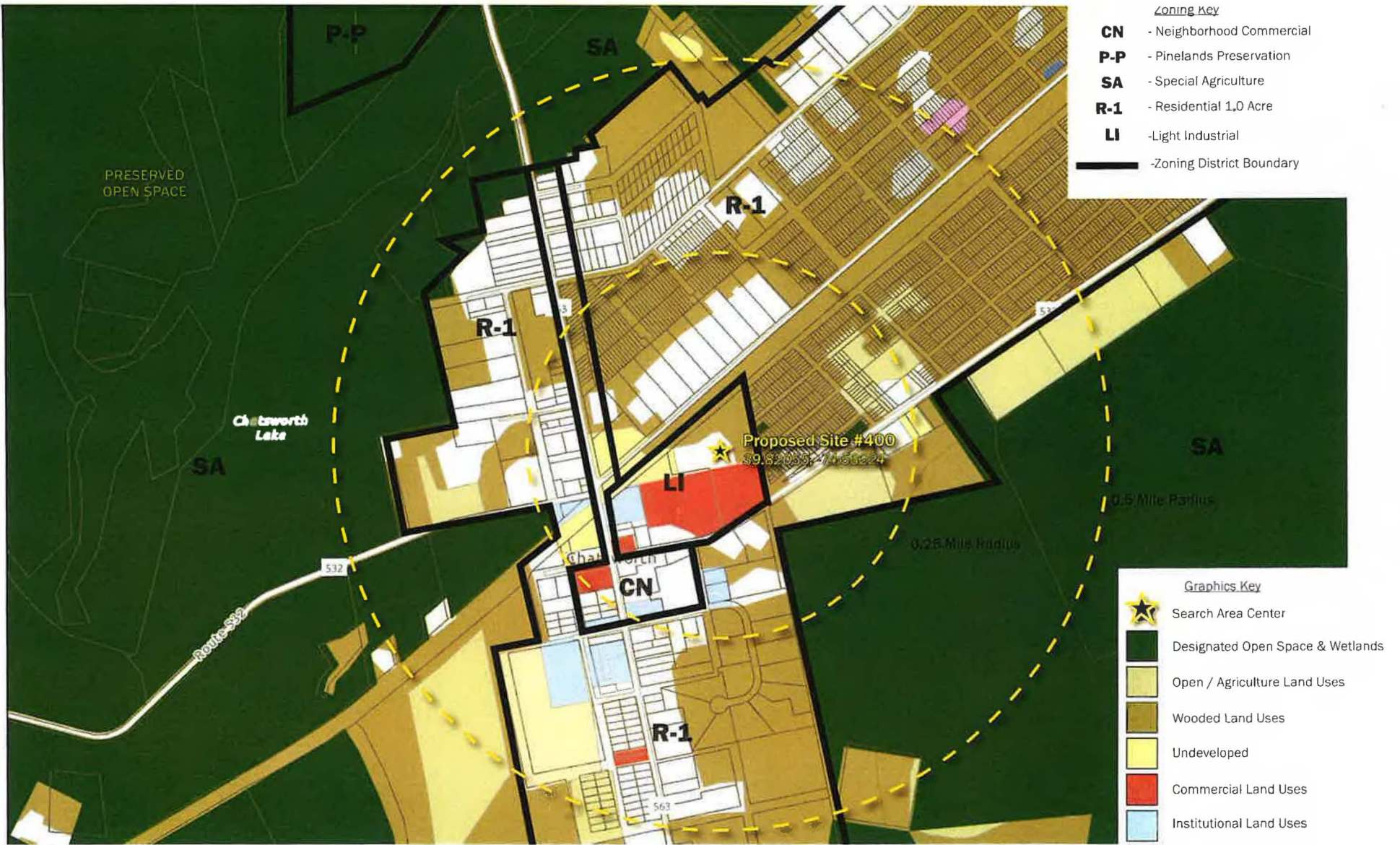


- Graphics Key
- Search Area Center
 - Designated Open Space & Wetlands



Map D - Proposed Site 400/ Chatsworth Village Zoning - 1 Mile
 Woodland Township, Burlington County, NJ
 September 25, 2025

EXHIBIT
 30



- Zoning Key
- CN** - Neighborhood Commercial
 - P-P** - Pinelands Preservation
 - SA** - Special Agriculture
 - R-1** - Residential 1.0 Acre
 - LI** - Light Industrial
 - - Zoning District Boundary

- Graphics Key
- Search Area Center
 - Designated Open Space & Wetlands
 - Open / Agriculture Land Uses
 - Wooded Land Uses
 - Undeveloped
 - Commercial Land Uses
 - Institutional Land Uses
 - Industrial Land Uses
 - Residential Land Uses



Map E - Proposed Site 400/ Chatsworth Village Zoning & Land Use - 0.5 Mile
 Woodland Township, Burlington County, NJ
 September 25, 2025





Map F - Proposed Site 400/ Chatsworth Village Zoning & Aerial - 0.25 Mile
 Woodland Township, Burlington County, NJ
 September 25, 2025



Photographic Inventory & Simulations

Proposed AT&T Site 400 / 39.82055, -74.53224
160-foot Monopole - Wireless Telecommunication Facility

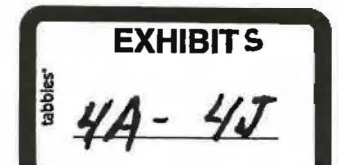
1555 Chatsworth Barnegat Road
Chatsworth, NJ 08019
Woodland Township, Burlington County

September 25, 2025

Prepared For:



Prepared By:





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Photographic Key Map - Proposed ATT Site 400



Yellow Arrows
Anticipated Visibility



Blue Arrows
Obscured Visibility

White Arrows
Not Visible

tabbles®

EXHIBIT

4/A





View # 1 - From Main Street & Peacock Street



Proposed AT&T Site 400 / 39.82055, -74.53224
Exhibit Prepared: September 25, 2025

EXHIBIT
tabbles®
4B

Not Visible





View # 2 - From Savoy Boulevard (Viewing East)

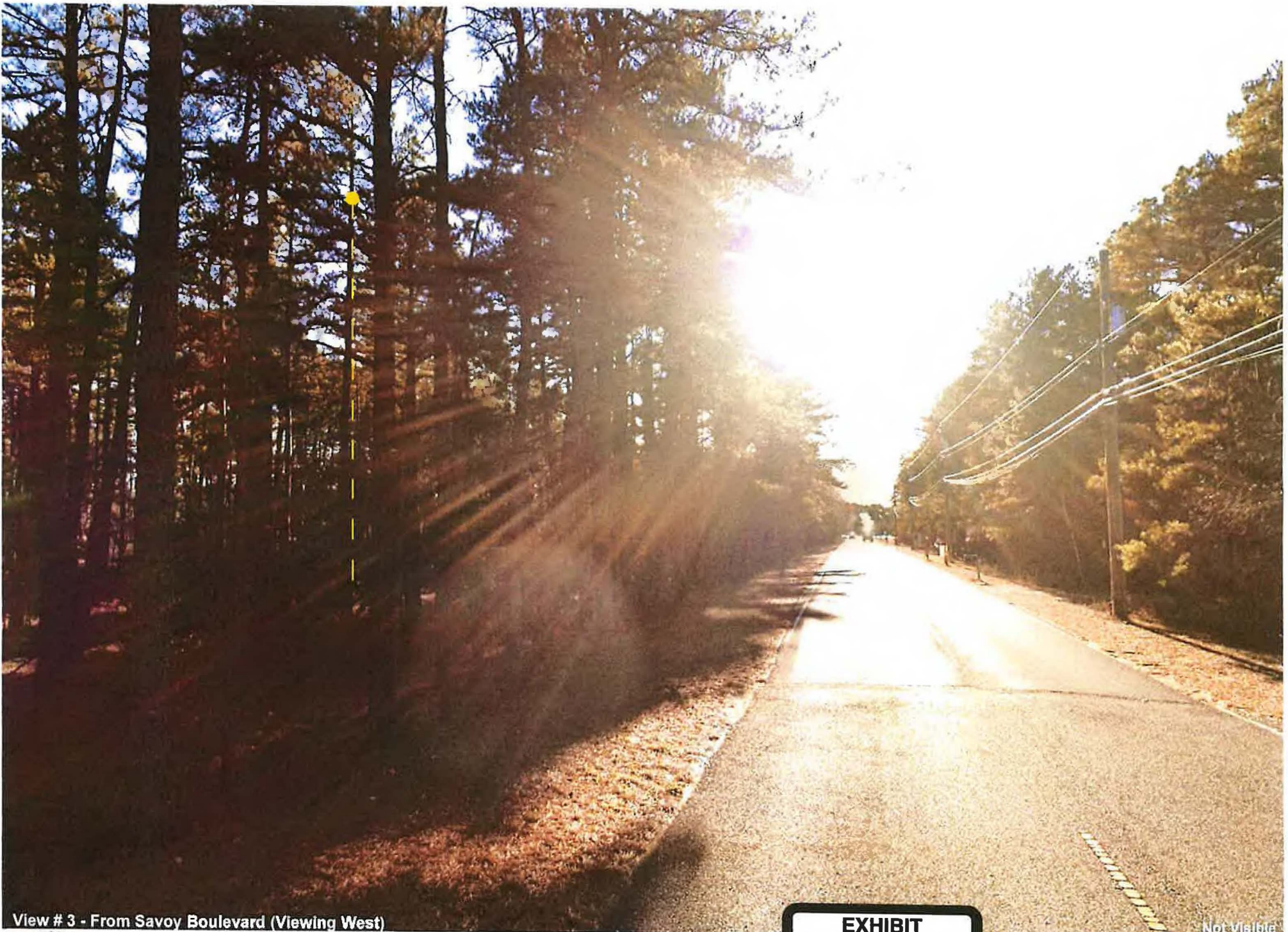


Proposed AT&T Site 400 / 39.82055, -74.53224
Exhibit Prepared: September 25, 2025

EXHIBIT
4/C

Not Visible





View # 3 - From Savoy Boulevard (Viewing West)



Proposed AT&T Site 400 / 39.82055, -74.53224
Exhibit Prepared: September 25, 2025

EXHIBIT
tabbles®
40

Not Visible





View # 4 - From Chatsworth Barnegat Road



Proposed AT&T Site 400 / 39.82055, -74.53224
Exhibit Prepared: September 25, 2025

tabbles[®]
EXHIBIT
4E

Not Visible





View # 5 - From Chatsworth Barnegat Road



Proposed AT&T Site 400 / 39.82055, -74.53224
Exhibit Prepared: September 25, 2025

tabbles®

EXHIBIT

4F

Anticipated Visibility



seidel planning & design
land solutions



View # 6 - From Main Street & First Street



Proposed AT&T Site 400 / 39.82055, -74.53224
Exhibit Prepared: September 25, 2025

EXHIBIT

4/G

tabbles

Anticipated Visibility





View # 7 - From Tabernacle Chataworth Road



Proposed AT&T Site 400 / 39.82055, -74.53224
Exhibit Prepared: September 25, 2025

tabbles[®] EXHIBIT
4H

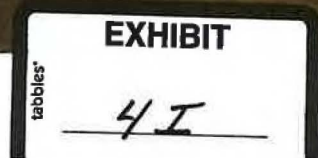
Anticipated Visibility
 **seidel** planning & design
land - solutions



View # 8 - From Main Street



Proposed AT&T Site 400 / 39.82055, -74.53224
Exhibit Prepared: September 25, 2025



Obscured Visibility





View # 9 - From Tabernacle Chatsworth Road



Proposed AT&T Site 400 / 39.82055, -74.53224
Exhibit Prepared: September 25, 2025

EXHIBIT

tabbles®

4 J

Anticipated Visibility





From: Kafka, John <jkafka@co.burlington.nj.us>
Sent: Thursday, August 10, 2023 11:51 AM
To: Bert Stern <bstern@towernorth.com>
Cc: Lash, Christopher <Christopher.Lash@jacobs.com>; Gubbei, Gary <ggubbei@co.burlington.nj.us>
Subject: RE: Communications Tower on Canal Street / Woodland Township

All concerned,

The Burlington County radio tower on Canal St in the Chatsworth section of Woodland Twp, NJ is a single antenna structure used to support multiple antennas operated by different carriers. The following is currently co-located on this tower:
700 MHz National Interoperability 7 TAC channels 52, 54 and 76.
Burlington County Public Safety (BCPS) 700 MHz P25 trunked system.
BCPS VHF 4 Channel PSSN simulcast system.
BCPS VHF Fire paging.
BCPS Office of Emergency Management ARES/RACES.
New Jersey State Police P25 trunked system.
New Jersey Forest Fire VHF
State of NJ Interoperability
WBZC FM Broadcast
Unfortunately, the tower is currently maxed out and we have no room to co-locate any other carriers.

Respectfully,

John Kafka

County of Burlington - Dept. of Public Safety
Division Head - Communications Support Division
1 Academy Drive Westampton, NJ 08060
609 518 7762-Office
609 820 1036-Cell
609-265 1323-FAX
jkafka@co.burlington.nj.us

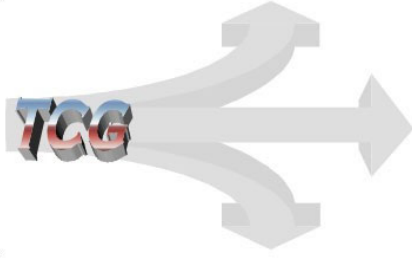
Appendix D - Hierarchical Policy for Locating Individual Wireless Facilities

The Plan also references a one-half mile radius around every proposed facility's approximate location. To properly apply the CMP's standards within the context of this Plan, if approved, the following procedure (adopted by the Commission on September 11, 1998) will be used when the companies seek to finalize these approximate locations.

1. Except as otherwise specifically noted in this report, there will be a general presumption that a facility's final location will be within the immediate area of the location proposed in this Plan, i.e., the Pinelands management area group and municipality described in the Plan as further defined using the geographic coordinates prepared by the Commission's staff. If it proves to be infeasible to site the facility on an existing, suitable structure (i.e., one that does not require a change in mass or height which significantly alters its appearance), the use of other existing structures or, as appropriate, eligible sites which meet the standards in N.J.A.C. 7:50-5.4(c)4 will be considered. The company's feasibility assessment will need to include confirmation from other parties to this Plan who are slated to share the facility that the selected site meets their needs.
2. If siting of the facility within the immediate area of the Plan location is infeasible, the company will broaden its search area consistent with the service need for the facility and in conformity with other appropriate technical considerations, but in no case will that area extend beyond a half-mile radius. This will require consultation with other parties to this Plan who are slated to share the facility to ensure that any new location meets their needs.
3. Within that broader search area, consideration will first be given to locating the needed antenna on an existing, suitable structure if that structure does not require a change in mass or height that significantly alters its appearance.
4. Failing that, the use of other existing structures that may require a significant change in mass or height (if appropriate in view of the CMP's standards, including those related to visual impacts) or sites for a new structure within the search area will be evaluated. Only those structures or sites which meet the requirements of N.J.A.C. 7:50-5.4(c)4. and other applicable CMP standards will be selected. If that broader search area crosses the boundaries of the Pinelands Area or its management areas, the company will seek to site the facility in the following order of preference:
 - a. Outside the Pinelands;
 - b. Pinelands Regional Growth Areas, Pinelands Towns and the developed portions of Military and Federal Installation Areas;
 - c. Pinelands Rural Development Areas, Agricultural Production Areas, undeveloped portions of Military and Federal Installation Areas and Pinelands Villages other than those expressly identified in N.J.A.C. 7:50-5.4(c)6; and

d. Pinelands Preservation Area District, Special Agricultural Production Areas, Forest Areas and the Pinelands Villages expressly identified in N.J.A.C. 7:50-5.4(c)6.

5. If no feasible structures or sites are found, the company should reexamine the surrounding facility network and propose an amendment to this Plan which conforms to CMP standards. Of course, the company retains its right to seek a waiver of strict compliance from the standards of the CMP, although the Executive Director notes that the tests will be difficult to meet.



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Review of
New Cingular Wireless PCS LLC D/B/A AT&T
First Amendment
to the 2003 AT&T Plan

presented to the
New Jersey Pinelands Commission
November 26, 2025

Prepared by
Bruce Eisenstein, Ph.D., P.E.

December 22, 2025

A handwritten signature in blue ink that reads 'Bruce A. Eisenstein' with a stylized flourish at the end.

Bruce A. Eisenstein, Ph.D., P.E.

Introduction

In preparation for this report, we reviewed the following Federal Document:

***** The FCC Telecommunications Act of 1996**

We read and reviewed the package submitted on November 26, 2025 by Warren. O. Stillwell, Esq. Attorney for AT&T:

Application of New Cingular Wireless PCS LLC d/b/a AT&T fir First Amendment To the 2003 AT&T Plan

In addition , we reviewed the following Web Sites referenced in the 12/8/2025 email from Brad Lanute [PINELANDS]:

State of New Jersey Pinelands Commission:

- (1) **Planning for Wireless Communications Facilities
(specifically the 2003 Appendix B (Technical Consultants Review): At&T Siting Plan Amendment)**
<https://www.nj.gov/pinelands/landuse/current/wireless/>
- (2) **The Comprehensive Management Plan**
<https://www.nj.gov/pinelands/cmp/>
- (3) **Pinelands Property Maps**
<https://www.nj.gov/pinelands/home/maps/interactivemap/>
- (4) **Pinelands Property Map (Chatsworth area)**
<https://www.nj.gov/pinelands/home/maps/maps/documents/archD.pdf>
- (5) **Data**
<https://www.nj.gov/pinelands/home/maps/datas/index.shtml>

Background

Cellular communication is enabled by allowing a handheld or mobile unit to communicate with an antenna site located near the base station at the center of a cell. Both the handheld and the base station must put out sufficient power so that they can “hear” each other. The handheld units are mobile, frequently in cars, and as the handheld crosses from one cell to another there must be a “handoff” or the call will be dropped creating an interruption in service. Consequently, sufficient power must be available traversing from cell to cell.

However, cell towers cannot emit too much power since the aim is to confine the signal to the rough borders of the cell. Consequently, the emissions from cell towers are generally low power and since the power from the cell tower degrades exponentially with distance from the tower site, the level of exposure for people on the ground is safe if the site is in full compliance with FCC standards. For that reason, when a cell site is to be constructed, it is required to produce a compliance report to show that the standards of the FCC have been met.

In addition, for the information of the Commission, propagation plots are required to show that the site is necessary and appropriate to satisfy the design standards of the applicant.

Analysis

The applicant is requesting a modification to their 2003 Siting Plan Amendment (Web Site 1 from above). This is to improve the AT&T coverage in the area of Chatsworth Village for both wireless users and First Responders under the Federal FirstNet Authority for which AT&T was awarded a contract to “build and manage the National Public Safety Broadcast Network. The Exhibits 2A through 2F provided by DBM Engineering P. C. in the application package serve to demonstrate justification of the proposal to add Site 400 in Chatsworth and eliminate the need for AT&T to use the prior approved Site 41 to the AT&T Comprehensive Plan for the State of New Jersey Pinelands.

Exhibit 2A “Existing AT&T Reliable Coverage” is a propagation plot showing wireless coverage at a power level of -95 dBm¹ around the area of Chatsworth Village. It shows that the Village has very little reliable coverage at present.

Exhibit 2B “AT&T Proposed Reliable Coverage” is a propagation plot including the proposed antenna site 400 showing wireless coverage at a power level of -95 dBm including the entire area of Chatsworth village.

Exhibit 2C “AT&T Reliable Coverage with Original Site #41” is a propagation plot not

¹ It should be noted that this power level is reasonable for design purposes and comports with numbers we have seen in other locations.

including the proposed antenna site 400 but with the prior approved Site #41 showing no improvement in wireless coverage for Chatsworth Village at a power level of -95 dBm.

Exhibit 2D “AT&T Reliable Coverage with “Chatsworth” raised to 219’ AGL” is a propagation plot showing wireless coverage at a power level of -95 dBm around the area of Chatsworth Village with the adjacent NJL03311 (called “Chatsworth”) raised to 219’ AGL and showing minimal improvement in reliable coverage at -95 dBm in Chatsworth Village.

Exhibit 2E AT&T Reliable Redundant Coverage with “Chatsworth” and adjacent site on-air and both raised to 219’ AGL” is a propagation plot showing wireless coverage at a power level of -95 dBm around the area of Chatsworth Village with both the adjacent NJL03311 (called “Chatsworth”) and the site to the left of NJL03311 on the map raised to 219’ AGL and still showing minimal improvement in reliable coverage at -95 dBm in Chatsworth Village.

Exhibit 2F “AT&T Reliable Coverage with “Chatsworth” raised to 219’ AGL and “Site 062” at 200’ AGL” is a propagation plot showing wireless coverage at a power level of -95 dBm around the area of Chatsworth Village with both the adjacent NJL03311 (called “Chatsworth”) site at 219’ AGL and the prior approved but unbuilt Site 062 if on air would again provide only minimal improvement in reliable coverage at -95 dBm in Chatsworth Village.

Conclusions

We agree that removing Site 41 from the Comprehensive Plan and replacing it with the Proposed Site 400 in Chatsworth Village would meet the requirements of reliable coverage at -95dBm in Chatsworth Village and the surrounding area. In addition, the requirement for AT&T to provide FirstNet service to First Responders in the area will be met.

The proposed Site 400 is to be located “in or near a Pinelands Village (Chatsworth)” but the actual site has not been specifically identified. When and if that happens, the applicant will be required to “demonstrate satisfaction” with the Pinelands regulations at the time that an application is made for Pinelands approval of a specific site. In addition, zoning and RF safety requirements will have to be demonstrated by application to the appropriate municipal entity.