On behalf of Joint Base McGuire-Dix-Lakehurst (JB MDL) New Jersey, the following comments are provided regarding a proposed amendment to the Comprehensive Management Plan for PCS Communications Facilities in the Pinelands, dated 1 August 2011, by T-Mobile. JB MDL became aware of the T-Mobile proposal on 27 September, the same day as the Public Hearing, and could not make comments in person.

The materials available on the Pinelands Commission website do not provide enough information to determine if the proposed changes will have a significant impact to JB MDL operations. Specifically:

1. Six tower locations (69, 70, 71, 72, 90, and 104) are on or close to the Joint Base. The exact location, site elevation, and tower height are necessary to determine if the towers will interfere with military aviation. Three of the towers are aligned with military runway approaches or are within Accident Potential Zones.
2. Three towers (77, 76, and 86) are located along the flight path between JB MDL and the Warren Grove Aerial Gunnery Range. Location, elevation, and height data are necessary to determine if these towers would interfere with flights between these two facilities.
3. It is unclear how T-Mobile’s written materials can imply that the towers will be too short to require FAA concurrence when tower height is not provided in any of the documents.
4. It is unknown if the towers will be equipped with navigational lights to prevent aircraft collisions.

The Joint Base is in a phase of vibrant growth and has been the recipient of additional missions from other base closures. Our air traffic has been increasing. It is critical that cell phone tower placement, height and lighting be carefully considered as our mission increases in and around NJ. Military aviation has been a traditional and accepted use of the Pinelands for almost one hundred years.

JB MDL looks forward to commenting on the proposed changes to your plan when information can be provided to determine the specific impacts of the changes. Please provide the information for our review when available. If you have any questions, please contact me at 732-323-7544.

DENNIS BLAZAK, GS15, DPAC
Deputy Asset Manager, 87th Civil Engineer Squadron