

FILE COPY

APPENDIX F (Executive Director's Report 8/21/98)

**WRITTEN COMMENTS RECEIVED DURING THE PUBLIC REVIEW PROCESS ON
THE REVISED PROPOSED CELLULAR FACILITY PLAN SUBMITTED MARCH 17,
1998 WITH JUNE 1, 1998 REVISIONS**

<u>Date Received:</u>	<u>From:</u>
June 17, 1998	JAZZBOW@aol.com
June 16, 1998	William R. Farr, Mt Holly, NJ
June 22, 1998	Fav1126005@aol.com
July 6, 1998	Lt. Jonathan D. Wainwright, Evesham Township Police Department
July 7, 1998	Captain Stephen Addezio, Captain of Police Medford Twp.
July 7, 1998	Stephen A. Emery, Acting Chief of Police Pemberton Township Police Dept.
July 9, 1998	Jack & Michele Salemi, Tabernacle NJ 08088 (with attachments)
July 9, 1998	Richard W. Hunt, Evesham Township Solicitor (with attachment; letter from Jane Nogaki, referenced below)
July 9, 1998	Jane Nogaki Marlton NJ 08053
July 9, 1998	William McLaughlin, Tabernacle NJ
July 9, 1998	Document entitled <i>The Effects of the telecommunications Act of 1997 on the Infrastructure of Atlantic Electric a connective company</i> (Nicholas K. Salavatore Atlantic Electric Real Estate Department)
July 15, 1998	Bert Harper, Chief of Police, Westhampton Twp. Police Department
July 15, 1998	James F. Hansen, Chief of Police, Mount Holly Twp. Police Department
July 16, 1998	Stephen M. Aspero GALLO GEFNER FENSER, P.C. Hackensack, NJ (with attachments)
July 17, 1998	Michael J. Gross, Esq. (Giordano, Halleran & Ciesla)
July 17, 1998	Michael E. Benson, Esq. (Woodbine Borough Municipal Atty.) (With attachments)
July 17, 1998	Thomas Glynn Hammonton, NJ
July 17, 1998	Jack J. Salemi Tabernacle, NJ (with attachments--copy of <i>The Effects of the telecommunications Act of 1997 on the Infrastructure of Atlantic Electric a connective company</i> see above)
July 17, 1998	Glenn Orr Marlton NJ with attachment
July 17, 1998	Paul J. Tuliano Burlington County Association of Chiefs of Police

July 17, 1998 John P. Butler, CPA Data Processing Coordinator
Office of the Clerk of the Board of Burlington County Freeholders

July 20, 1998 Mike Gordon, Group Manager, Conservation Assistance
US Dept of Interior (NPS) Chesapeake/Allegheny System Support

July 22, 1998 Bob Harbinson Evesham, NJ

July 22, 1998 Jennifer Borys, Secretary, Marlton Lakes Civic Association (with
map) 2 letters: 1 re: cell plan; 1 re: App. No. 98-0272.01

July 24, 1998 Frederick F. Galdo Burlington County Administrator/Board Clerk

July 27, 1998 William P. Cloyes Brighton Beach, NJ

July 27, 1998 Michael E. Benson, Esq. , Solicitor, Borough of Woodbine
(with attachment)

July 28, 1998 Anthony & Susan Melsi Marlton, NJ

July 29, 1998 Lynda A. Medvec Evesham NJ (with same attachment to both)
2 letters: 1 re: cell plan; 1 re: App. No. 98-0272.01

July 29, 1998 Patricia J. Carr Evesham, NJ
2 letters: 1 re: cell plan; 1 re: App. No. 98-0272.01

July 30, 1998 Robert E. & Rita Riebel Mitchell Evesham Township NJ

July 30, 1998 Wynne Falkowski, Chairperson Coalition Against Toxics
Atco, NJ 08004

July 30, 1998 Richard C. & Paulette Powell Sewell, NJ

July 31, 1998 Carleton K. Montgomery, Executive Director,
Pinelands Preservation Alliance

July 31, 1998 Michael J. Gross, Esq. (Giordano, Halleran & Ciesla)

July 31, 1998 Jack J. Salemi Tabernacle, NJ (with attachments)

August 3, 1998 Mr. & Mrs. John G. Takacs Evesham Twp. NJ

August 4, 1998 Christen Erichsen New Gretna, NJ

August 6, 1998 Todd A. Ganghamer, Director of Planning & Zoning
Manchester Township

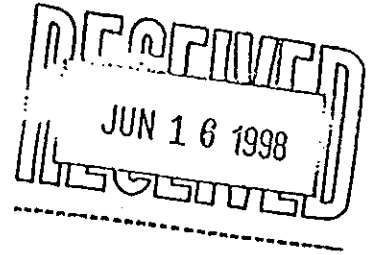
To: JAZZZBOW@aol.com
From: Public Programs <info@njpines.state.nj.us>
Subject: Re: towers
Cc:
Bcc:
<-Attachments:

At 08:15 AM 6/13/98 EDT, you wrote:

>Please do not allow towers to spoil the only unspoiled scenery left in
>this
>state, I grew up in the pines and it would be a crime to spoil their beauty
>

45 Brained Street
Mt. Holly, NJ 08060

15 June 1998



PINELANDS COMMISSION
New Lisbon, N.J. 08064

Please take note of my opposition to permitting the installation of any more transmission towers within the Pinelands, and in fact, to the existence of those currently installed.

I assume that the Commission is continually under strong pressure from economic interests to allow this and other kinds of development but I, for one, rely on the commissioners to hold fast and resist those pressures. The purposes of having the Pinelands protected outweigh the importance of providing cellular phone service.

My wife, Laura, joins me in taking this position.

Yours,

William R. Farr
William R. Farr

Fav1126005@aol.com, 08:46 AM 6/22/98, Re: tower locations

To: Fav1126005@aol.com
From: Public Programs <info@njpines.state.nj.us>
Subject: Re: tower locations
Cc:
Bcc:
Attachments:

At 09:34 PM 6/17/98 EDT, you wrote:

>Be advise Bayside State Prison, Leesburg N.J. has a 140 feet water tower
>that
>is vacant of antennas that may be utilize for cell phone. Also fire towers
>may
>be utilize and other various water tank towers thru out the state
>

Fav1126005@aol.com, 08:09 PM 6/22/98 , Re: tower locations

From: Fav1126005@aol.com
Date: Mon, 22 Jun 1998 20:09:23 EDT
To: info@njpines.state.nj.us
Subject: Re: tower locations

Contact fred vineyard, bayside state prison engineer for water tower
information at 609 785 0040 309



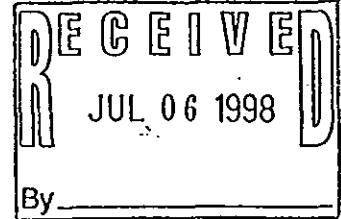
EVESHAM TOWNSHIP POLICE DEPARTMENT

JOSEPH M. CORNELY
Chief of Police

984 TUCKERTON ROAD
MARLTON, NJ 08053
609-983-1116
FAX 609-988-0954

July 2, 1998

State of New Jersey
The Pinelands Commission
15 Springfield Road
P.O. Box 7
New Lisbon, New Jersey 08064



RE: Comprehensive Plan for Wireless Communications Facilities in the Pinelands

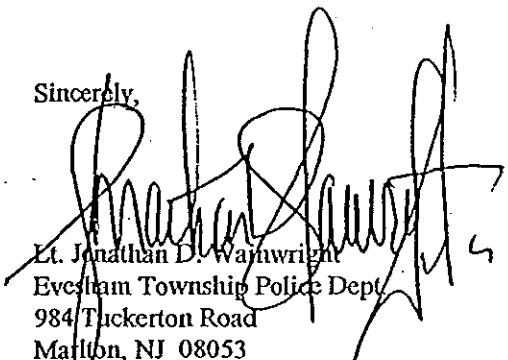
Dear Chairman Sullivan and Members of the Commission,

Evesham Township Police, in conjunction with the municipalities throughout Burlington County, are currently deploying equipment to allow emergency and public safety agencies to utilize wireless data services, (CDPD) provided by Bell Atlantic Mobile.

This service will promote and enhance public safety throughout Burlington County, including the Pinelands Management Area. We support the "Comprehensive Plan for Wireless Communications Facilities in the Pinelands" submitted by the cellular carriers, which when implemented, will improve coverage throughout Burlington County and Pinelands Management Area.

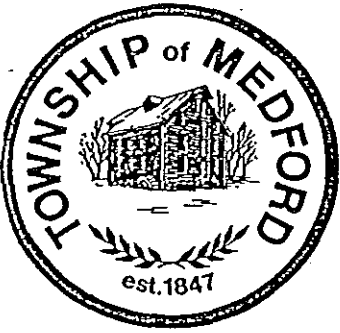
Because this coverage is so very vital and the technology so badly needed, we request that your commission give all due consideration toward approval of this plan. We believe that by doing so, it will be in the best interest of officer safety.

Sincerely,



Lt. Jonathan D. Wainwright
Evesham Township Police Dept.
984 Tuckerton Road
Marlton, NJ 08053
609-985 4348

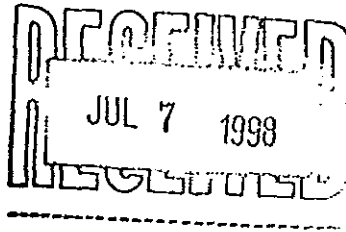
cc: Mr. Jeff Mathesen - B.C. Communications
Mr. John Butler - B. C. Data Processing
Mr. Ed Witts - Bell Atlantic Mobile



DEPARTMENT OF PUBLIC SAFETY

91 Union Street, Medford, N.J. 08055-2432

EMS Division
609-654-5731
Fire Division
609-953-3291
Police Division
Emergency 9-1-1
Non Emergency 609-654-7511
Admin. Fax 609-654-5996
Patrol Fax 609-953-5835



July 2, 1998

State of New Jersey
The Pinelands Commission
15 Springfield Road
PO Box 7
New Lisbon, NJ 08064

RE: Comprehensive Plan for Wireless Communications Facilities in the Pinelands

Dear Chairman Sullivan and Members of the Commission:

Burlington County, in conjunction with the municipalities throughout the County, are currently deploying equipment to allow various emergency and public safety entities to utilize a wireless data service (CDPD) provided by Bell Atlantic Mobile.

This service will provide public safety throughout Burlington County, including the Pinelands Management Area. We support the "Comprehensive Plan for Wireless Communications Facilities in the Pinelands" submitted by the cellular carriers, which when implemented, will improve coverage throughout Burlington County and the Pinelands Management Area, thereby allowing these agencies to take full advantage of this technology.

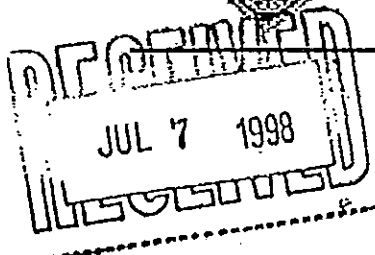
Respectfully yours,

Stephen Addezio
Captain of Police

PEMBERTON TOWNSHIP POLICE DEPARTMENT

CHIEF PAUL J. TULIANO JR.

500 Pemberton-Browns Mills Road
Pemberton, N.J. 08068-1539
Phone 609-894-7955/Fax 609-894-0302



July 7, 1998

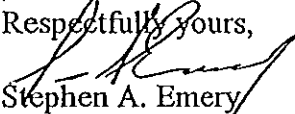
State of New Jersey
The Pinelands Commission
15 Springfield Road
P.O. Box 7
New Lisbon, New Jersey 08064

RE: Comprehensive Plan for Wireless Communications Facilities in the Pinelands

Dear Chairman Sullivan and Members of the Commission,

Burlington County, in conjunction with the municipalities throughout the County, are currently deploying equipment to allow various emergency and public safety entities to utilize a wireless data service (CDPD) provided by Bell Atlantic Mobile.

This service will promote public safety throughout Burlington County, including the Pinelands Management Area. We support the "Comprehensive Plan for Wireless Communications facilities in the Pinelands" submitted by the cellular carriers, which when implemented, will improve coverage throughout Burlington County and the Pinelands Management Area, thereby allowing these agencies to take full advantage of this technology.

Respectfully yours,

Stephen A. Emery
Acting Chief of Police

August 16, 1995

Jack & Michele Salemi
5 Bridlewood Ct.
Tabernacle, NJ 08088

Mr. Terrence D. Moore
Executive Director
Pinelands Commission
PO Box 7
New Lisbon, NJ 08064

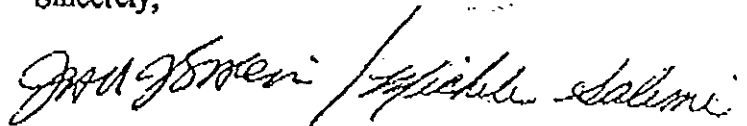
Dear Mr. Moore:

On behalf of the many angry residents residing in a two mile radius of the proposed 180+ ft. Bell Atlantic Mobile transmitting tower, two modular equipment buildings, and access road, at block 101 lot 5 in the Ward Sand & Gravel property, we submit this petition of opposition.

As stated, this is only a two mile radius response of residents in opposition. These towers transmit electro-magnetic energy 7 miles . We will be starting another petition covering a 7 mile area. Many of the addresses on the petition, that indicate Sooy Place Road, Vincentown, are mailing addresses with residents actually residing in Woodland Twp. Chatsworth.

We hope the Pineland Commission Will make the correct decision for preserving our Beautiful Pine Barren Natural Resource Forrest Region, and not harming any of its Inhabitants, Physically or Emotionally.

Sincerely,



Jack & Michele Salemi

cc: Congressman Jim Saxon
Senator Leonard T. Connors
Ms. Theresa Lettman

July 26, 1995

To: All concerned neighbors

Re: Bell Atlantic Mobile Systems Tower Proposal

As Many of our neighbors might already be aware of, Bell Atlantic Mobile System plans to erect a 199 ft. cellular phone tower on Ward Sand C., located on Sooy Place Rd. in Woodland Township.

This tower will place many of our homes on Sooy Place and Bridlewood Ct. in its RED ZONE. This zone is where the towers highest energy is emitted. (5 mile RADIUS)

Recently the Pinelands Commission reversed thier position on hight limits from 35 ft. to 200 ft. to accomodate Bell Atlantic. The reason given for this accomodation was to increase communication between ambulances and hospitals in emergencies, and better general mobile phone communication. We spoke to Senator Connors about this and he called it rediculous. He is currently working on this project with us.

The only people that will benefit from this tower are Bell Atlantic Mobile and the owners of Ward Sand Co. Ward plans to lease this site for 25 years at a substantial amount of money. During this 25 year lease, we will be the people exposed to the electro magnetic radio waves continually, and looking at this site in the middle of our Pine Barrens.

As many people might remember, last year a group of Medford Lakes people banned together to keep a cellular tower like this one out of thier town. They stated the reasons being the unknown health risks of living in an electro magnetic field, the eye sore it would cause and the devaluation of thier properties. The people of Medford Lakes won.

We truly believe the people who live here do not want to look at this tower, or live with its emissions in its high energy zone of untested technology for Bell or Wards gains.

We also believe if we ban together as the people in Medford lakes did, we can stop this insanity.

If you are interested in helping us with this cause, please attend the next town meeting on August 8, 1995 at 7:30 PM at the Municipal Building in Chatsworth, or call Jack at 859-9649.

Thank you,



Jack Salemi

PETITION

W

e the undersigned residents and property owners in Woodland and Tabernacle Townships oppose all of the variances and/or ordinance exemptions being requested by Bell Atlantic Mobile Systems, Inc. to construct a 180+ foot free standing cellular antenna tower, the two associated free standing modular equipment buildings and roadways, on the property owned by the Ward Sand and Materials, Inc (Block 101, Lot 5).

The undersigned oppose the above described variances for their unknown long term potential health risks and hazards, potential impact on property values, concern for the environment and the long term implications of granting variances that are unrelated to the principle business of the Ward Sand and Materials Company.

The undersigned are committed to the preservation of our community's and family's safety and the environment of our townships.

NAME	ADDRESS	TELEPHONE NUMBER
Michelle Klimi	58 Bridlewood Ct. Tabernacle	859-9649
Jack Galeri	5 BRIDLEWOOD CT TABERNADE	859-9649
Carrie Foley	4 Bridlewood Ct. Tabernacle	859-8141
Jim Makint	4 Bridlewood Ct. Tabernacle	859-8141
Leonard Knight	6 Bridlewood Ct. Tabernacle	859-9302
Harold Martin	6 Bridlewood Ct. Tabernacle	859-1971
John Bony	1 Bridlewood Tabernacle	859-9448
Steph & Bony	1 Bridlewood Tabernacle	859-9448
Mike Egg	214 Sooy Place Rd. Tabernacle	859-8831
Phil C. Egg	214 Sooy Place Rd. Tabernacle	859-8831
Dennis Carlson	RD #1 Sooy Place Rd. Vincentown	859-1401
Paul A. Fraefact	RD1 Sooy Place Rd. Vincentown	859-0119
Patricia A. Herbert	RD1 Sooy Place Rd. Vincentown	859-0119
Carl Kuster	RD1 Sooy Place Rd. Vincentown	859-3971
Jack Jancusi	354 Sooy Place Rd. Vincentown	859-1210
John J. Jancusi	Rd #1 Sooy Place Rd. Woodland	859-3608
Ray E. Jancusi	Sooy Place Rd, Woodland	859-3569
John M. Forte	Sooy Rd. Woodland Twp	859-3886
Maria Forte	Sooy Rd. Woodland Twp	859-3886
Monica D. Goff	194 Sooy Place Tabernacle	859-0319
Bob Goff	194 Sooy Place Tabernacle	859-0319
Michael J. Ford	179 Sooy Pl. RD. Tabernacle	859-0058

PETITION

W

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The undersigned are committed to the preservation of our community's and family's safety and the environment of our townships.

<u>NAME</u>	<u>ADDRESS</u>	<u>TELEPHONE NUMBER</u>
Harrison Alexander	177 Sorey Place Rd.	859-8636
Andrew Grantham	176 Sorey Place Rd.	859-0209
Michelle [unclear]	174 Sorey Road	859-9547
Brad [unclear]	170 Sorey Rd.	859-8180
W. Hamilton	71 Avenue Rd.	859-2425
Colin J. Hamilton	71 AVENUE RD.	859-2425
Matty Hamble	71 AVENUE RD	" "
W. [unclear]	65 Ave Rd.	859-9772
[unclear]	65 Avenue Rd.	859-9772
J. Caputo	63 Avenue Road	859-8399
M. [unclear]	63 Avenue Road	859-8399
Rochelle [unclear]	53 AVENUE ROAD	859-2906
Carol [unclear]	53 Avenue Road	859-2906
Thomas [unclear]	47 Avenue Road	859-3728
Laura [unclear]	47 Avenue Rd.	859-3728
William Moffatt	214 POWELL PLACE RD.	859-1514
William [unclear]	190 Sorey Place	859-4075
Charles [unclear]	186 Sorey Place	859-9221
James [unclear]	186 Sorey Place	859-9221

PETITION

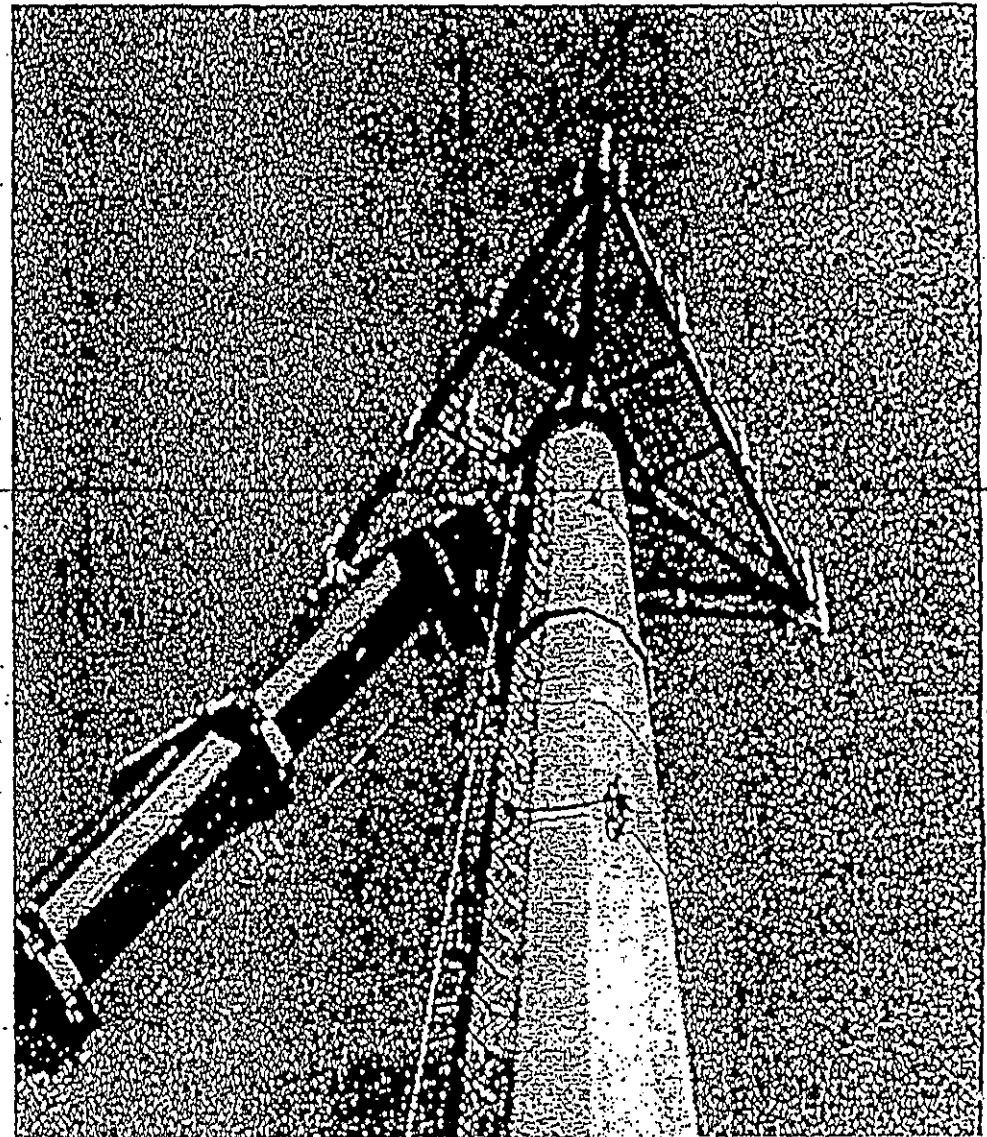
<u>NAME</u>	<u>ADDRESS</u>	<u>TELEPHONE NUMBER</u>
Suzanne Williams	179 Sooy Place Rd	859-0058
Lizette A. DeTata	8 Bridlewood Ct, Tabernacle	859-1584
Merald C. DeTata	8 Bridlewood Ct, Tabernacle	859-1584
John Fleming	8 Bridlewood Ct, Tabernacle	859-1584
Alburt Weber	7 Bridlewood Ct, Tabernacle	859-3362
Sam W. Kelle	7 Bridlewood Ct, Tabernacle	859-3362
Mae J. Bannister	R31 Sooy Place Rd Vincentown	859-2723
Barbara E. Clark	208 Sooy Place Rd Tabernacle	859-8447
Leticia S. Lee	208 Sooy Place Rd Tabernacle	859-8447
Robert E. King	208 Sooy Place Rd TAB	859-8447
Sharon Bowen	15 Peggy Ln, Tabernacle NJ	859-3286
John King	19 Peggy Lane Tabernacle	859-0140
Sharon Bowen	15 Peggy Lane Tabernacle	859-3386
Daniel Thull	16 Peggy Lane TABERNACLE	859-0140
Jacqueline Kauter	9 Peggy Lane Tabernacle	859-0140
Johanna Curie	1 South Duff Dr. Vincentown NJ	859-9490
Ch. Britz	2 Bridlewood Ct TABERNACLE	859-3969
Dorothy Breitner	2 Bridlewood Ct, Tabernacle	859-3969
Christine	RD #1 Box 352 Sooy Rd. Vincentown NJ	859-2457
Pat Arent	RD #1 Box 352 Vincentown	859-2457
Andy Glicks	Sooy Place Vincentown	859-1703
Ken Nirkas	Sooy Place Vincentown	859-1703
Bob Coats	Sooy Rd TABERNACLE	859-3613
Wanda J. Miller	Sooy Rd, VINCENTOWN	859-9017
Diane S. Miller	Sooy Rd, VINCENTOWN	859-9017
Margaret Knight	6 Bridlewood Ct, Tabernacle NJ	859-9302
Wanda S. Miller	20 Sooy Rd, VINCENTOWN NJ	859-2785
Richard J. Walnut	20 Sooy Rd Vincentown NJ	859-2785
John C. Yeet	205 Sooy Rd. TABERNACLE	859-0084
Ernie Yeet	205 Sooy Pl. Rd Tabernacle	859-0084
Donna L. Yeet	209 Sooy Pl. Rd Tabernacle	859-0516
Jeff Israel	209 Sooy Pl. Rd Tabernacle	859-0516
Jeanne Bowen	209 Sooy Pl. Rd Tabernacle	859-0560

TOWERING PROPERTY CONCERNS

The construction of cellular towers continues to meet resistance from residents, but the antennas' effect on property values remains inconclusive.

By RAYMOND FAZZI
BUSINESS WRITER

They can tower above a neighborhood by 150 feet or more. Their proliferation across the nation's landscape is a telltale sign of a



Towering

From page G1

the second concern: the possibility that towers depress the value of surrounding properties.

"The property value issue is just as fuzzy as the health issue, some officials say.

"For every study that someone does to show there isn't any effect, there's the perception out there that there is," said Beverly Scarano, an appraiser who sits on the Monmouth County Board of Taxation.

"But it's so difficult to prove unless you have data."

The data about which Scarano is talking are comparative studies that prove that, with everything else being equal, a home near a cellular tower will have a lesser value than a comparable home that is nowhere near a tower.

In tax appeals that come before the board, Scarano said, such studies are often done to show power lines, landfills, highways or other structures are reducing property values.

But, those cases are easier to prove because those structures have been around a lot longer than cellular towers, she said.

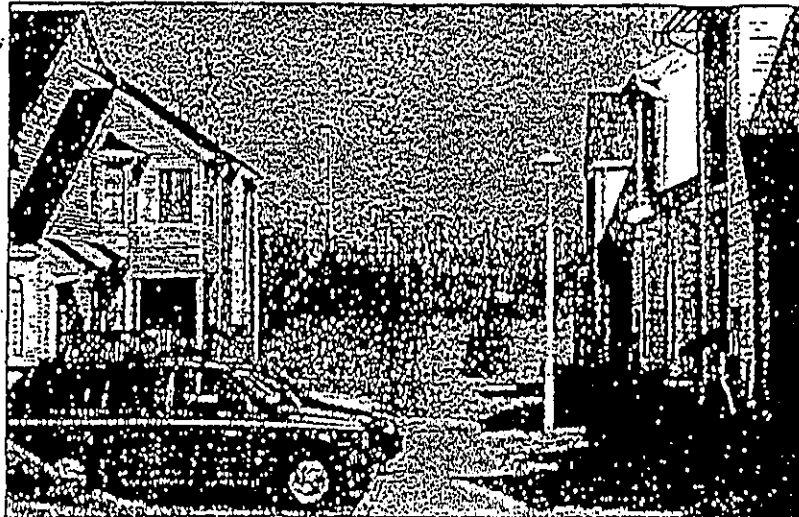
Yet as cellular companies continue to place antennas, the case history on the issue continues to grow.

And the interpretations of the towers' impact on property values remain divided.

Robert McNeely Vance & Co. in Somerville, an appraisal firm that is a consultant to cellular companies, has studied more than 50 cellular antenna locations, appraiser Mark Tinder said.

"We have yet to find any marketable impact," he stated.

Not all the case studies involved towers of 100 feet or more. Some studies looked at antennas discreetly



NICK COSTELLO/Staff photographer

● The new 150-foot Comcast Cellular Communications tower can be seen from The Harbor Club on Lighthouse Lane in Sayreville.

placed on water towers, for example.

Nonetheless, he said, comparative studies by the firm have not turned up depressed values for homes near antennas.

"Although there might be the perception by some people that their homes would be stigmatized, the market itself has shown that not to be the case," he said.

"The fact of the marketplace is that people who are so predisposed are evidently such a small amount of the home-buying public that the marketplace itself is not reflecting this great concern or stigma."

But some appraisers argue that one merely has to use his common sense to realize that, in some cases, towers can affect property values.

"The question you have to ask yourself is: If I had two houses to buy, would I want to buy a lot where I know there is a cellular tower, or do I want a lot without a cell tower?" said

Joe Haydu, an appraiser with Benchmark Appraisal Inc. in Lakewood.

"The answer is obvious."

Less clear, he said, is how much

less a home near a cell site may be worth.

"The \$64,000 question is how much or less?" he said. "Is it 10 percent, 20 percent, 30 percent?"

Michael Inzelbuch, an attorney in Lakewood, has worked both sides of the issue.

He's represented 29 objectors to cellular tower construction. He also has acted as a representative or consultant in 16 cases for companies looking to build towers.

By Inzelbuch's estimate, there are more than 100 pending applications before local zoning boards in New Jersey for new cellular tower construction. He expects hundreds more because newly licensed wireless communications companies are starting to emerge in the marketplace.

"There are going to be hundreds more of these things," he said.

Inzelbuch said his research on the issue has failed to turn up conclusive evidence that cell towers are hazardous or detrimental to property values.

He's commissioned four studies on behalf of tower objectors looking at

property values in Monmouth, Bergen and Somerset counties. None of the studies, he said, could find a tower-induced deflation of values.

One of the studies was started in 1988. It centered on properties surrounding a 396-foot antenna tower in Warren Township, in Somerset County.

In an initial study, and three subsequent updates, including one in 1996, no diverse effects were seen on real estate values, said appraiser Robert M. Vance, principal of Robert McNeely Vance & Co.

The study, he said, compared three different properties: those in proximity of the tower, those in the same neighborhood but a farther distance from the tower, and comparative properties no where near any towers.

Homes looked at in all three areas sold for about \$150 per square foot, he said.

The development near the tower was Wedgewood Estates, an upscale complex where homes cost \$300,000 or more, he said. The study looked at homes as close as 400 to 500 feet from the tower, he said.

For Haydu of Benchmark Appraisal, the issue is close to home.

His parents own property in a rural area of Blairstown Township in Warren County that has been earmarked for construction of a 180-foot cellular tower.

The issue has been controversial. Residents and municipal officials have been fighting the proposal for years, Bernice Haydu said.

The undeveloped land, about 4.5 acres, has been for sale for several years, she said. The controversy over the cellular tower began in 1994. She blames the prospect of the tower for her inability to sell the land.

"People don't want that eyesore," she said. "If you have small children, you're also very concerned about safety."

cellular antenna near his Freehold Township home, Donald Amarese, didn't hesitate. He fought it.

"We're near a state park, so it's a pretty nice area here," he said. "Most of the objections were to the sight of the tower. It's an eyesore."

Residents fought and won a battle to keep a cellular tower out of their neighborhood last year.

It's a scenario that has been played out with mixed results throughout the rest of the state and country.

In the communities of Plumsted Township, Little Silver, West Long Branch, Old Bridge Township and Middletown Township, proposals for new cellular towers have created controversies over the past few years.

Fueling the confrontations are fast-growing cellular companies, including AT&T Wireless, Bell Atlantic Nynex Mobile and Comcast Cellular Communications — and the need to expand their facilities for a growing base of customers who use cellular phones, pagers and other wireless communications devices.

With court precedent favoring cellular companies, under the assumption that the antennas are for the public good, many of the cases have led to tower construction over the objection of residents.

Cellular companies, meanwhile, acknowledge they've been trying to be more discreet about constructing towers. Several companies in the nation, including one in Holmdel Township, specialize in disguising towers as trees.

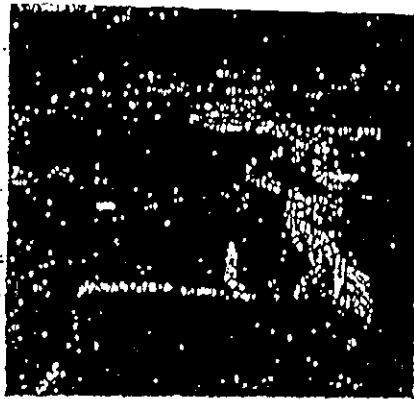
Yet the legal battles continue. And at the center of the controversies, in most cases, is a question that has yet to be answered definitively: *Do cellular towers lower property values?*

In proceeding after proceeding, two main fears continually spring up among residents fighting the construction of a cellular tower.

One of the concerns is about safety. Scientific studies are inconclusive, but some fear the electromagnetic radiation produced by cellular towers pose a health risk to surrounding residents.

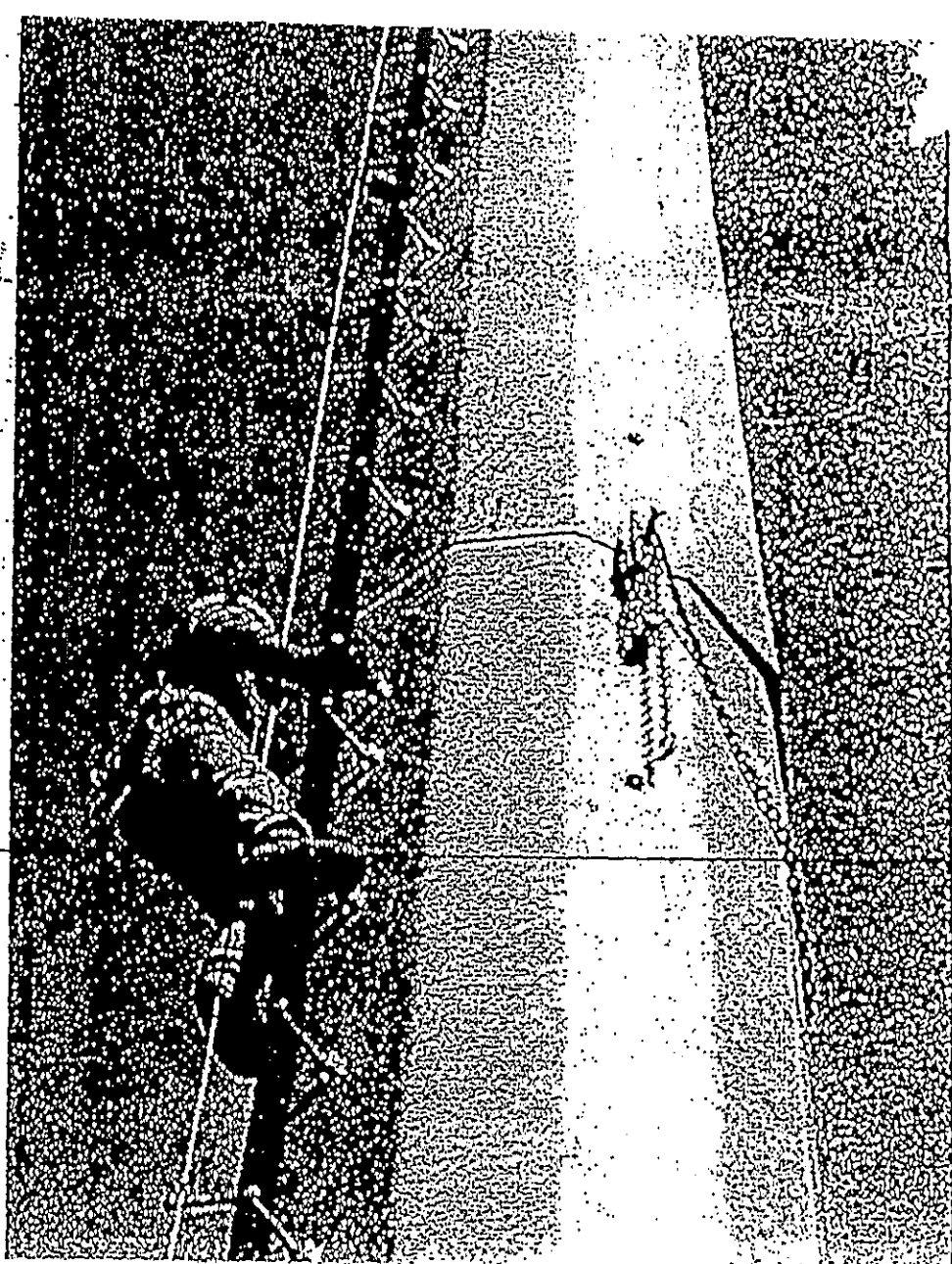
This concern, and the perception that towers are simply ugly to look at, leads to

Please see *Towering*, page G7



Dick Costello/Staff photographer

● Jim Clarke of Ultimate Building Concepts of French Camp, Calif., works on a 150-foot Comcast Cellular Communications tower off Route 35 in Sayreville, at right. The tower, erected last Tuesday, is near Lockwood's Marina, above.



From page G1

percent. Most of those will be built on existing structures.

Bell Atlantic Nynex has 220 cellular facilities in New Jersey. Sixty-five percent are on existing structures, like buildings, water tanks and towers

The average cellular tower is anywhere from 40 and 50 feet high, to 200 feet high.

Q Cellular companies have been criticized for not sharing tower space to limit the need for more towers. Is this situation changing?

A I think where we've not wanted

tions where our needs were different. We have tried to compromise those needs where possible and practical.

Q Has resistance by municipal officials and residents made cellular tower construction difficult?

A I think there was a period of time, over the last five years, when there was a heightened sense of

think the carriers have made an effort to bring in expert witnesses to address those concerns.

Even though you normally read newspaper stories about contentious hearing processes, 90 percent of the time these sites are approved without any public opposition. That's either because they are on existing structures or are situated such that they don't raise public concerns.

Antennas may be 'trees' or even fake bell towers

Richard Enright is director of engineering for Bell Atlantic Nynex Mobile's northern New Jersey operations. The region includes Monmouth, Middlesex, Somerset and Union counties. Bell Atlantic Nynex Mobile is one of six wireless communications companies doing

Q&A

Raymond Fazzl

business in the state. It is a joint subsidiary of Bell Atlantic Corp. and Nynex Corp., which also are hoping to merge into the nation's second-largest telecommunications company this year.

Q How has Bell Atlantic Nynex Mobile responded to concerns that cell towers are detrimental to property values?

A The carriers are sensitive to that issue. They have worked closely in the last several years to co-locate, where possible and to maximize the use of existing structures.

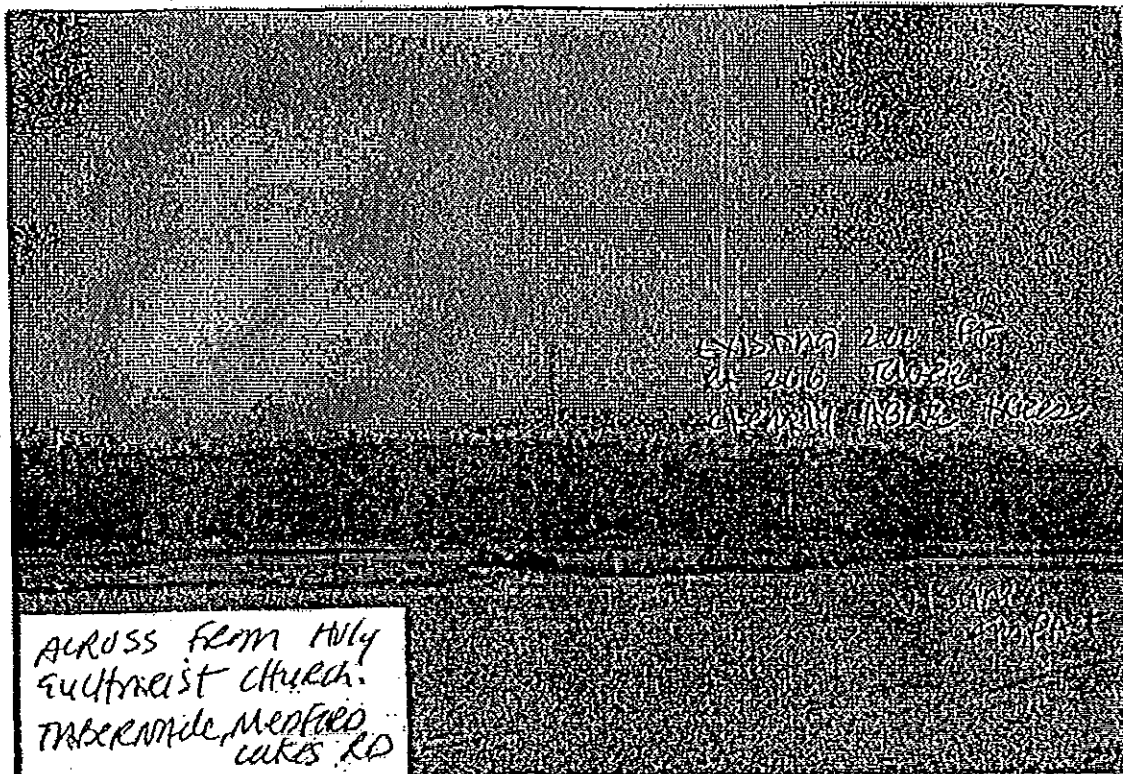
We've tried to use creative solutions to address that issue, like architecturally screening antennas on roofs. We are about to build our first tree (an antenna disguised as a tree) in Ringwood. AT&T Wireless will build its first tree antenna in Franklin Lakes. We and three other carriers plan to locate an antenna inside a fake bell tower on convent property in Mendham.

Our siting process is one where we look for existing structures first. Where no existing structures exist, we are looking at industrial and commercial zones. Only as a last resort do we build in a residential zone.

Q How many cellular towers do Bell Atlantic Nynex Mobile and other wireless companies have in New Jersey?

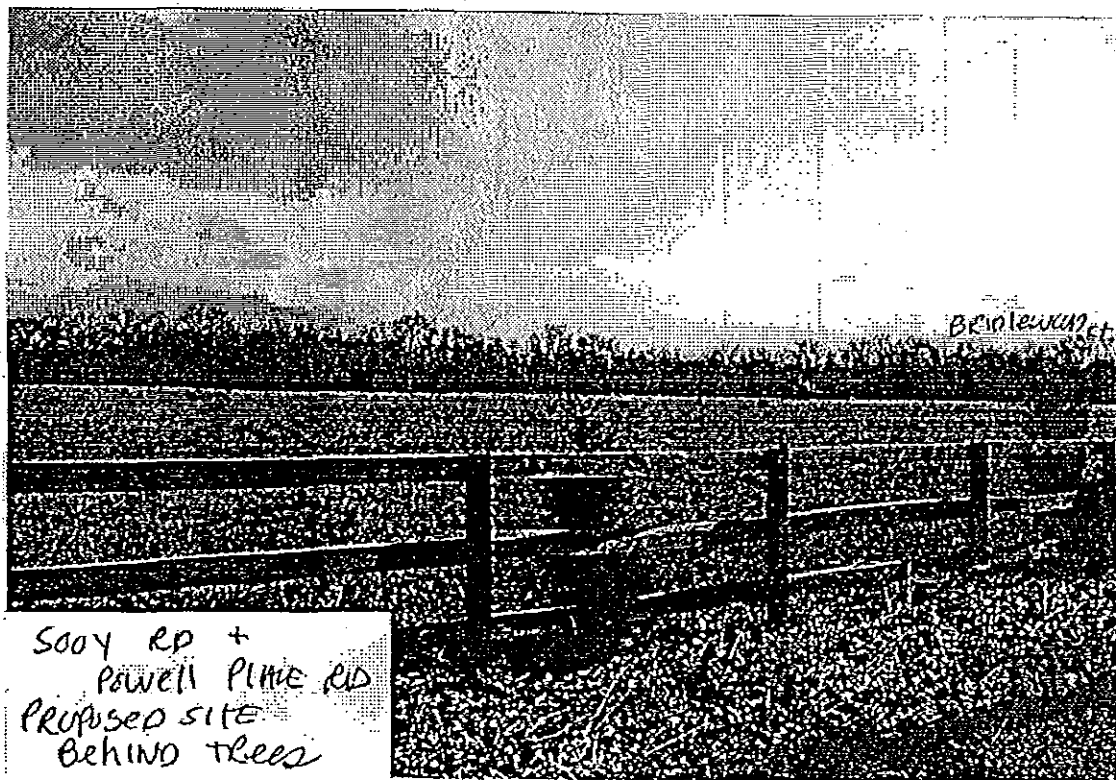
A There are 400-plus existing cell sites, but not all of them are towers. There will be a need over the next five years to increase that by 30 to

Please see Q&A, page G7



ACROSS FROM HOLY
EVANGELIST CHURCH.
TRABERNADE, MEDFORD
LAKES RD

SABINA 200 FT
21 200 TO 220
CANTON INDIAN HILLS



SOOY RD +
POWELL PLUM RD
PROPOSED SITE
BEHIND TREES

Brentwood

ESTIMATED TOWER CONSTRUCTION SITE

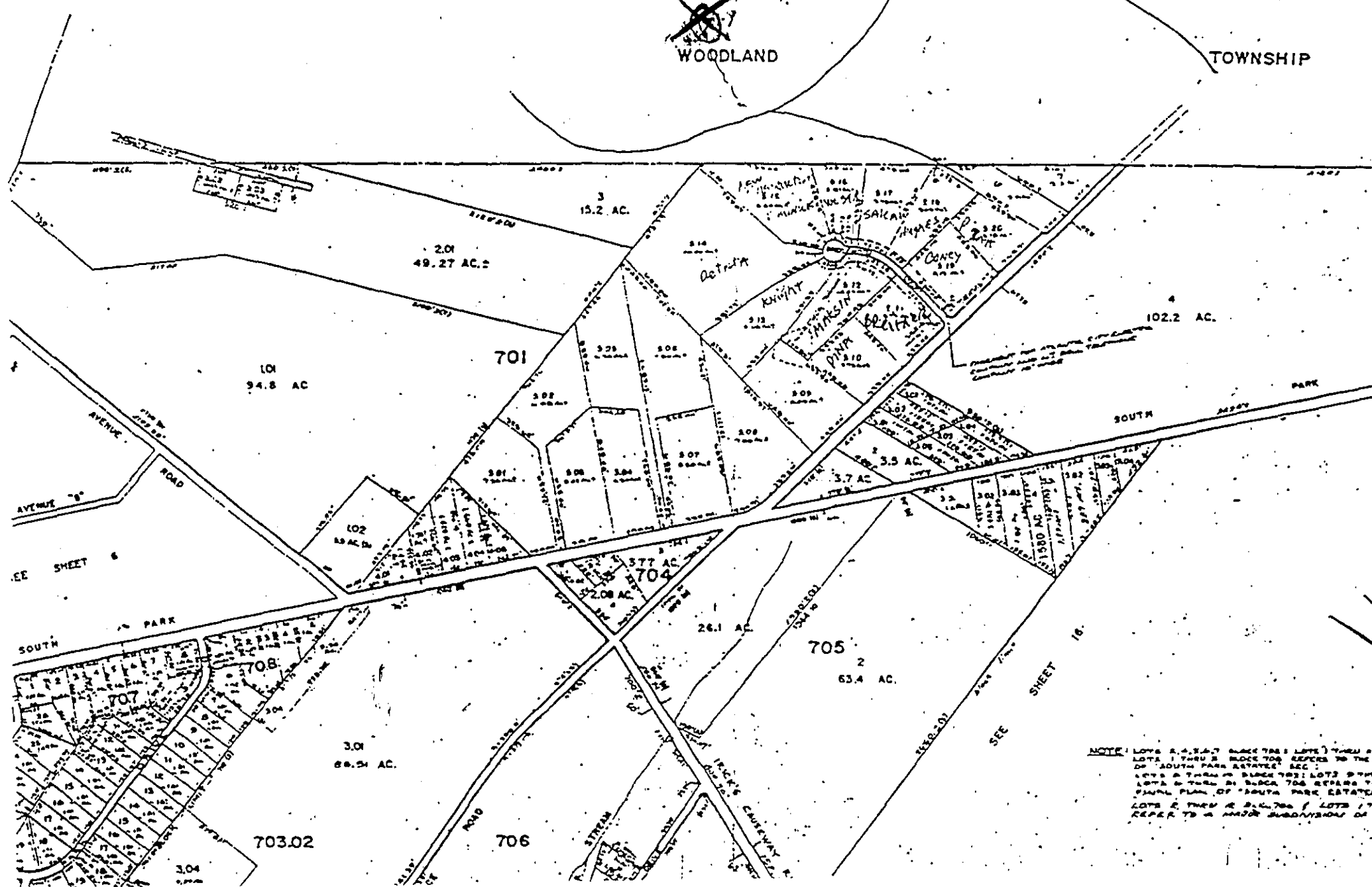
BLOCK 101
LOT 5 WARD SAND G.

BURLINGTON

COUNTY

~~WOODLAND~~

TOWNSHIP



NOTE: LOTS 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 341, 342, 343, 344, 345, 346, 347, 348, 349, 350, 351, 352, 353, 354, 355, 356, 357, 358, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, 382, 383, 384, 385, 386, 387, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 489, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 519, 520, 521, 522, 523, 524, 525, 526, 527, 528, 529, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891, 892, 893, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 930, 931, 932, 933, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000.

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MEMBERS OF THE FIRM ARE LICENSED
TO PRACTICE IN N.J., CO., NY, CT, PA, NC
ACADEMIC CRIMINAL LEGAL ATTORNEY
OCENTERS WORKERS COMPENSATION ATTORNEY

July 9, 1998

Marlton
File No. 09325-1

Hand-Delivered

The Pinelands Commission
P. O. Box 7
New Lisbon, NJ 08064

Attention: Chairman Daniel Kelleher
Director William Harrison
Members of the Pinelands Commission

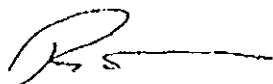
RE: Evesham Township/Cellular Telephone Towers

Dear Chairman Kelleher, Director Harrison, and Commission Members:

Please accept this letter on behalf of Mayor Augustus F. Tamburro and Township Council, with regard to the above referenced matter. This firm is the Township Solicitor for Evesham. This letter is sent to emphasize that the Township governing body agrees with the position set forth in the July 9, 1998 letter of Jane Nogaki, an Evesham Township resident and member of the Evesham Township Environmental Commission. In sum, it appears that there are three existing suitable structures upon which the cellular providers can locate antennas, in the immediate vicinity of proposed Tower No. 9. As the Comprehensive Plan for Wireless Communications clearly is geared toward these existing structures, and the proposed tower is immediately adjacent to a residential area in the Township, we would agree with Ms. Nogaki that proposed Tower No. 9 should be eliminated or relocated in favor of the use of an existing structure.

Please make this letter a part of the record for the public hearing, and give due consideration to the position of Evesham Township, and Ms. Nogaki, in this regard.

Very truly yours,



RICHARD W. HUNT

RWH/rbr/lcr
Enclosure

cc: Mayor and Members of Council, Evesham Township
Florence N. Ricci, Evesham Township Manager
Charlene Grabowski, Planning Board Secretary
Ms. Jane Nogaki

223 Park Avenue
Marlton, NJ 08053
July 9, 1998

re: Cellular Telephone Towers in the Pinelands

Chairman Kelleher and Members of the Pinelands Commission.

Thank you for holding this public hearing about the proposed Cellular Telephone Towers Comprehensive Plan for the Pinelands. The guidance given by the Pinelands Commission to the cellular providers to ensure the "least number" of facilities, and to use existing structures wherever possible is a reasoned approach which I support.

In examining the plan, I have noted a seeming inconsistency with the guidance regarding proposed tower #9, a new structure to be located in southern Evesham Township. It appears the proposal for this new structure violates the guidance that existing structure be used when feasible in the "height restricted region covering the Agricultural Production Area, Rural Development Area, and Select villages (blue shaded area). The Cellular Providers(CP's)s are required to verify that no existing suitable structure exists within the immediate vicinity of the proposed facility.

As noted on the enclosed map, three existing water towers that are existing suitable structure are located within three miles of the proposed yellow triangle site #9 (Group 1 facility).

These existing locations are:

1. Water Tower, Cooper and Taunton Road, Berlin Township
2. Water Tower, Kings Grant Golf Links, Evesham Twp.
3. Water Tower, Kings Grant, Connecting Way, Evesham Twp

In fact, Berlin Township Ordinance 1997-12 specifically identifies two specific sites for the location of commercial antennas or towers, at Block 2401, Lot 1, in the I zone and the Berlin Borough Water Tower at Block 2103, Lot 8.02.

In light of three existing suitable structures, I urge the Pinelands Commission to require that proposed facility 9 be reclassified from Group 1 to Group 2, cellular facilities which may be located on existing structures.(green triangles), thus fulfilling the goal of limiting the construction of new facilities to the least number.

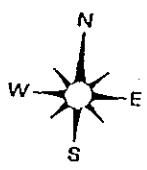
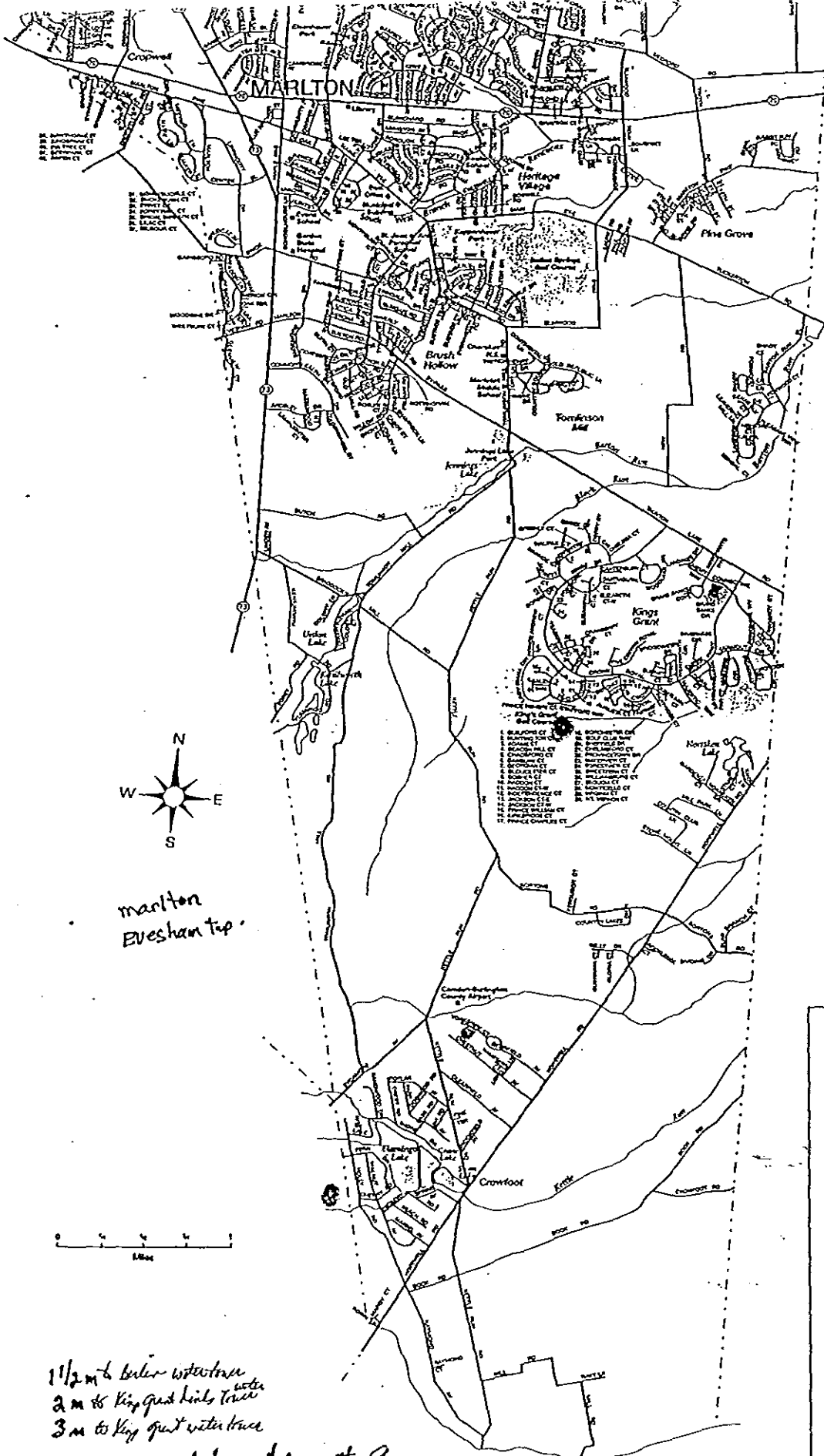
This request takes on added urgency in the light of negotiations between Cellular Providers and a property owner in a residential area on Chestnut Avenue in southern Evesham Township. Neighbors within 500 feet of the proposed facility are justifiably concerned for their health and safety. I see no reason for the siting of a tower facility in a residential neighborhood when three water towers within three miles of the Chestnut Avenue site provide reasonable alternative existing sites.

By requiring proposed facility #9 to locate on nearby structures, 1 of 16 proposed new structures can be eliminated. My comments today are limited to review of facility #9, and do not constitute an endorsement of the remaining 15 proposed structures.

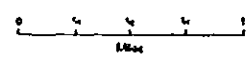
Jane Nogaki
223 Park Avenue
Marlton, NJ 08053
609-767-1110

cc:Mayor Gus Tamburro, Evesham Township
Florence Ricci, Evesham Township Manager

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marlton
Evesham Twp.



1 1/2 m to water treatment
2 m to King quit lands tract
3 m to King quit water tank

proposed Location # 9
existing water tower structures

William Mc Laughlin
5 Oak Drive
Tabernacle, NJ 08088

Pinelands Commission
New Lisbon, NJ

Re: testimony at 7/9/98 public hearing for proposal to install cellular phone towers
submitted by William Mc Laughlin

Dear Sir:

The proposal to locate towers to provide extensive phone coverage of the Pinelands area raises concerns. The Pinelands is a National Reserve with wildlife habitat preservation as an integral part of its comprehensive management plan. And, as a biosphere reserve with international significance, review for authorization of anthropogenic disturbances must not lack equal consideration for maintaining viable wildlife habitat. Although we appear to be forced into accepting a political decision that electromagnetic fields will not adversely affect human welfare, the potential impacts to wildlife caused by the introduction of extensive electromagnetic fields should be weighed carefully. Many species of wildlife have a physiological makeup that makes use of the Earth's natural background magnetic field for navigation. Authorizing artificial magnetic fields throughout a habitat preservation area such as the Pinelands National Reserve raises the question of whether Earth's ambient magnetic field will be allowed to remain perceptible anywhere within the Great Atlantic Migratory Flyway. And, what does such a determination hold for the future of the migratory species that utilize this flyway.

Additionally, without predetermining the effects that extended coverage of these electromagnetic fields will have on wildlife movements, the plan should be implemented in stages that will enable such an assessment prior to any commitment to extensive coverage.

As we encroach upon vestiges of undisturbed area within a fast-growing metropolitan area, it would seem likely that new technology will quickly make this proposed ground-based communication network obsolete. Because it can reasonably be expected that satellite communication networks will replace this ground-based network as the carrier of choice, restoration of the original landscape aesthetics should be ensured up-front as a permit condition, and the towers should not be permitted to inherit other uses simply because they persist beyond their originally intended use.

While some components are to be located on pre-existing towers at negotiated rental fees, new towers are to be located in areas restricted to other land uses because of their costs to Pineland resources and aesthetics. If the Pinelands Commission approves the construction of a new tower within restricted land use areas of a particular township, how does such an approval affect a township's prospect of renting space from pre-existing towers that were located in an environmentally sensitive manner? It appears that a plan which provides added wildlife protection from electromagnetic fields may also provide for a greater use of pre-existing towers with more revenue potential for the owners who had located them in an environmentally sensitive manner.

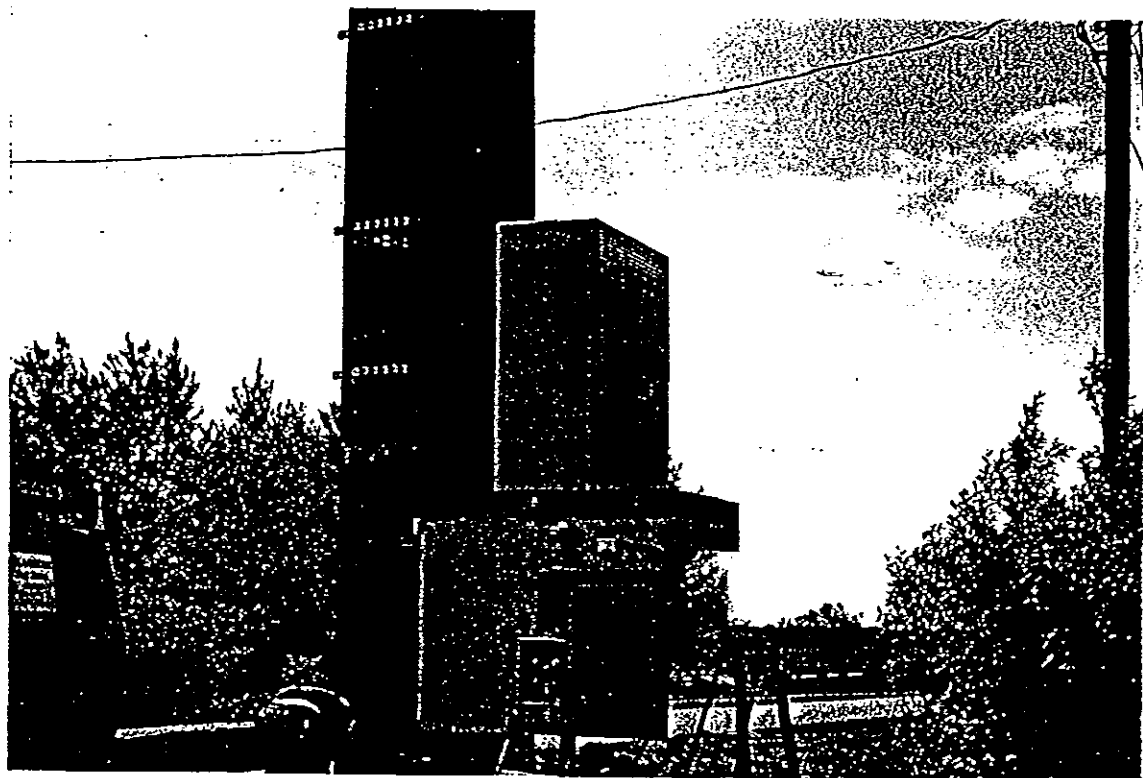
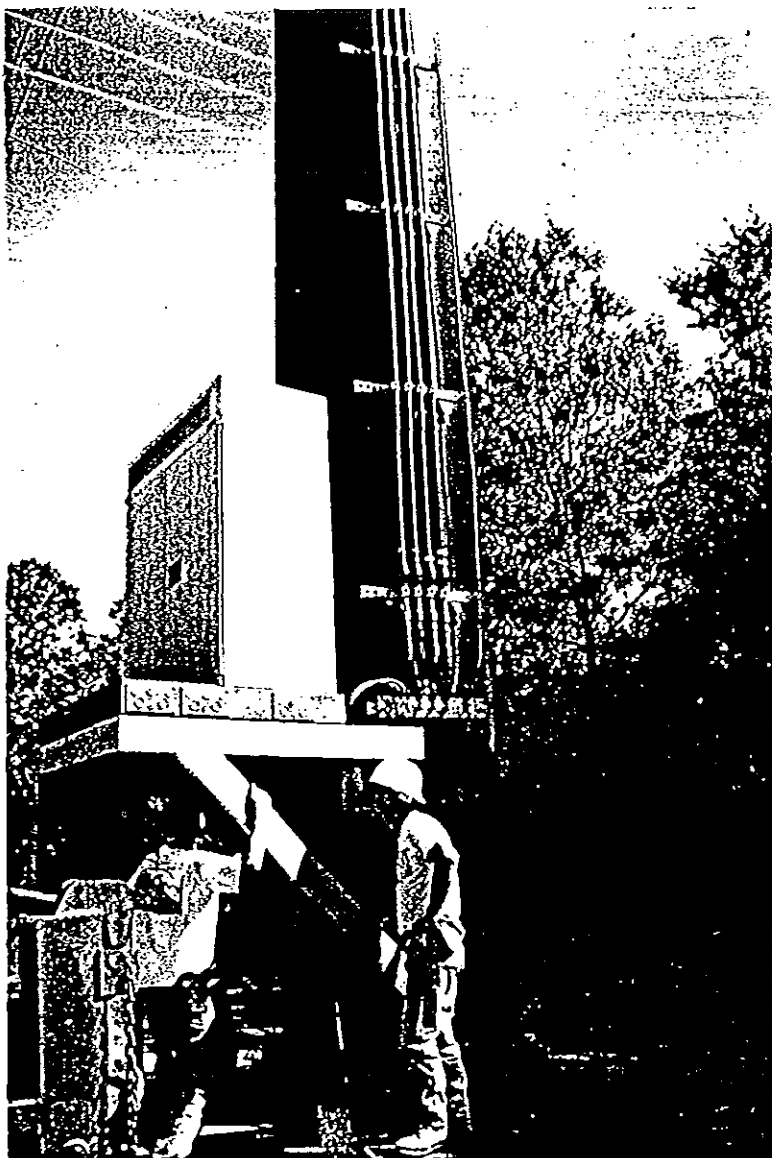
Sincerely,
William Mc Laughlin

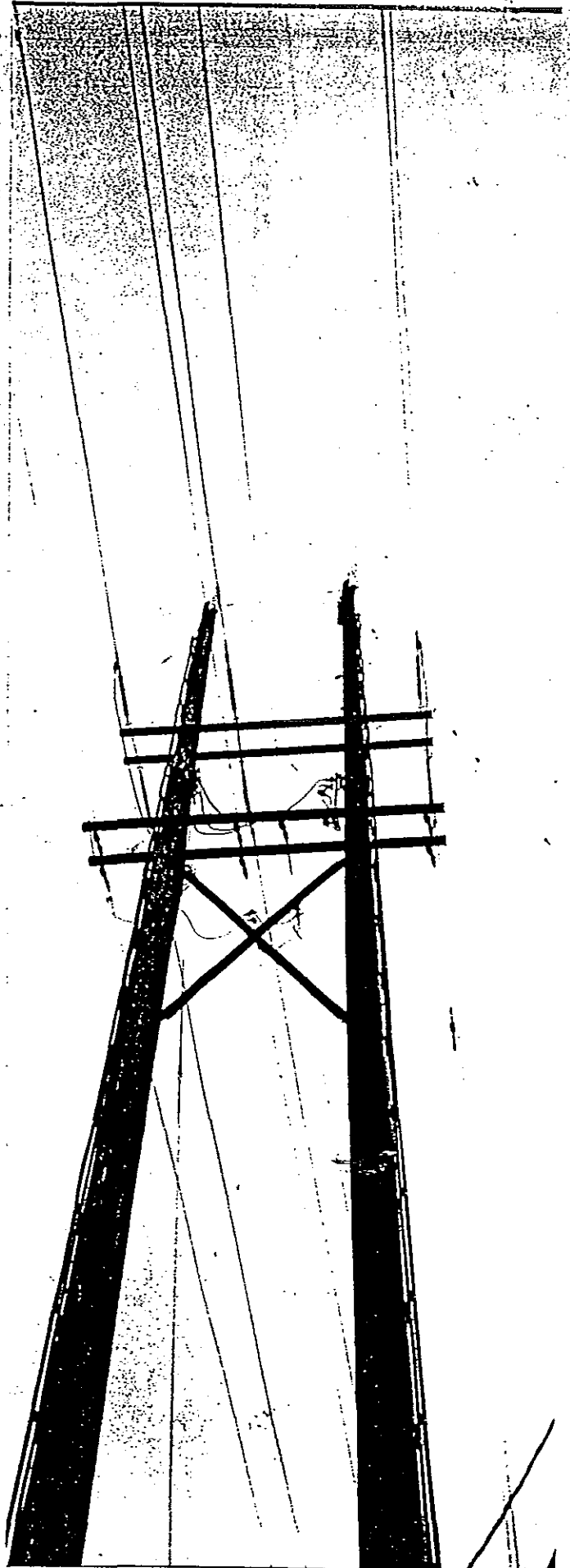
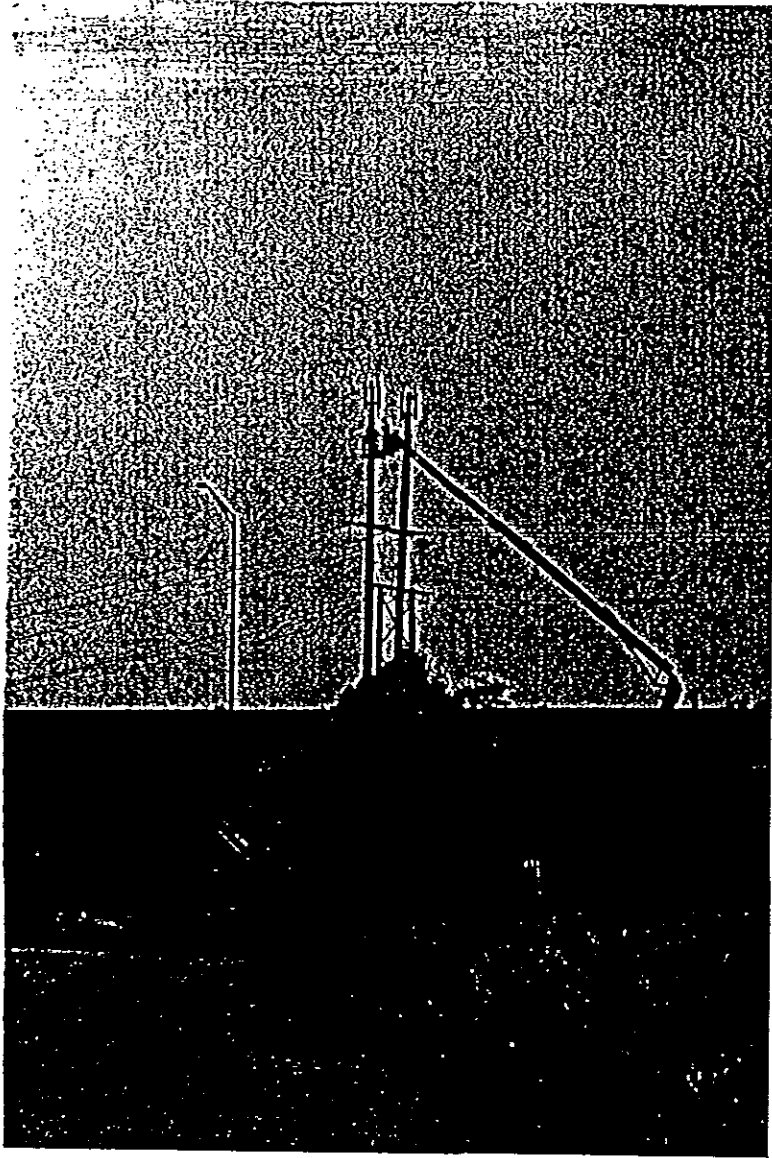
For more information, please contact:

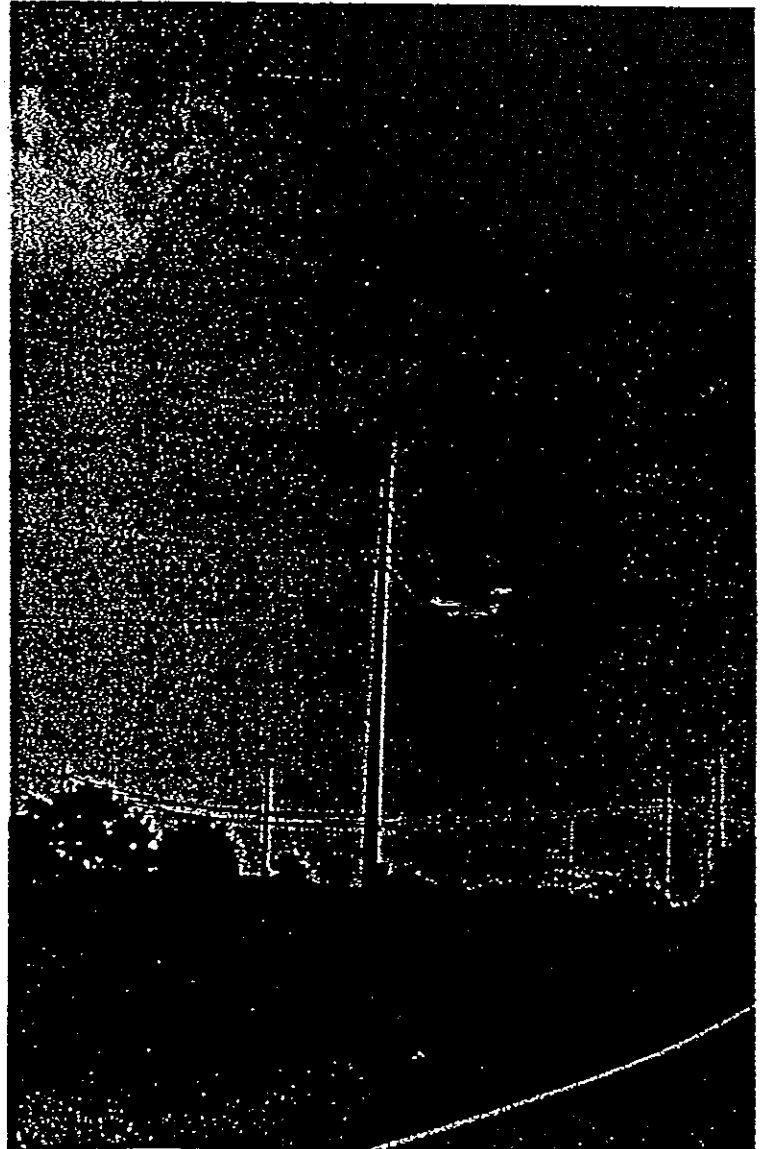
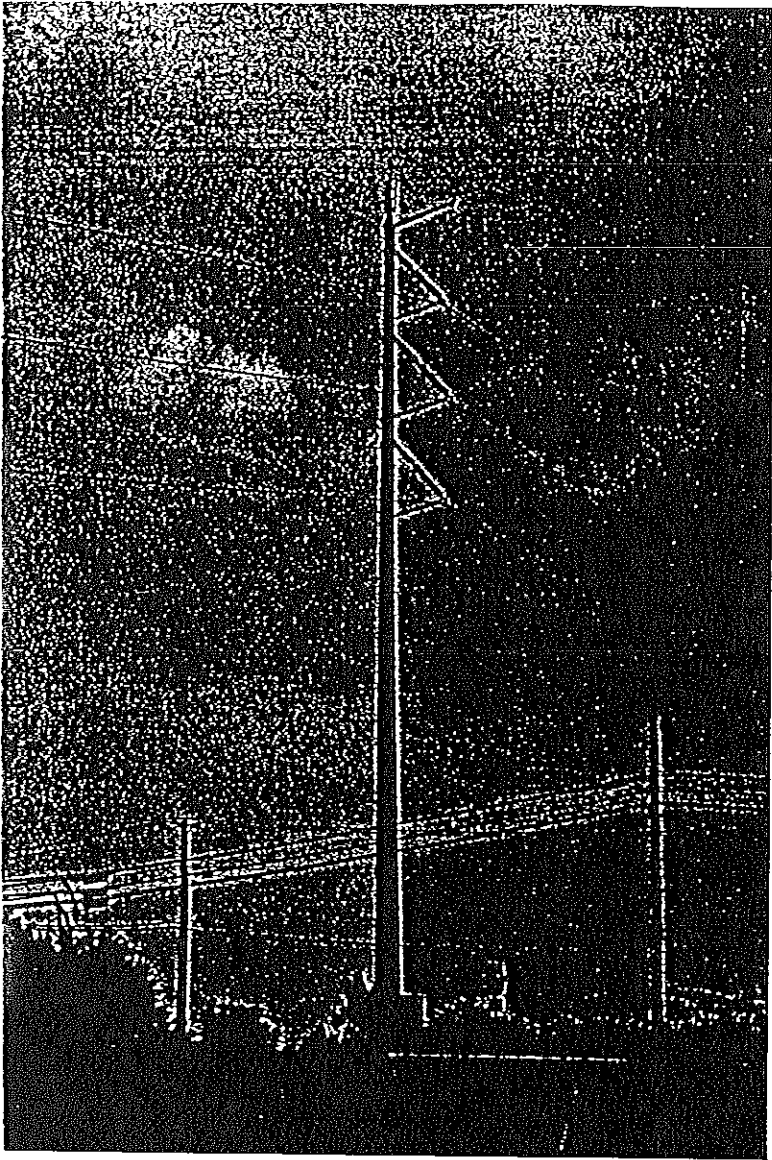
Nick Salvatore
Atlantic Electric
Real Estate Department
5100 Harding Highway
Mays Landing, NJ 08330

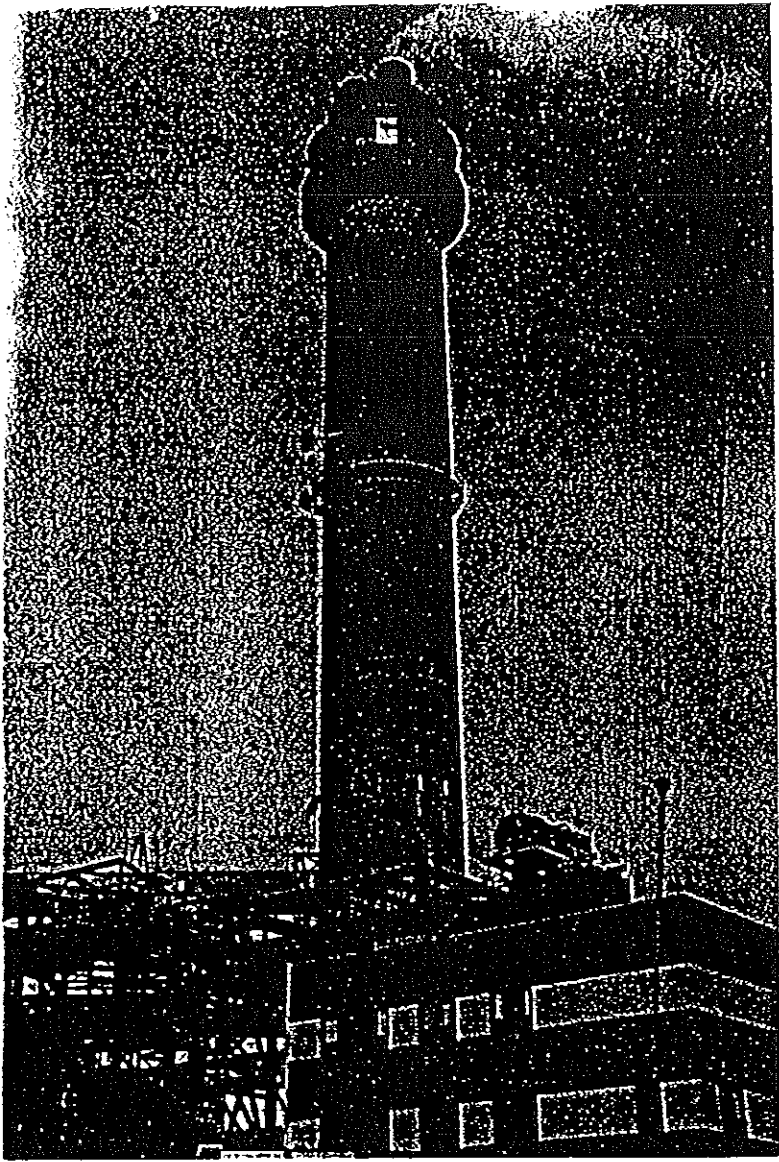
Phone: 609-625-5395

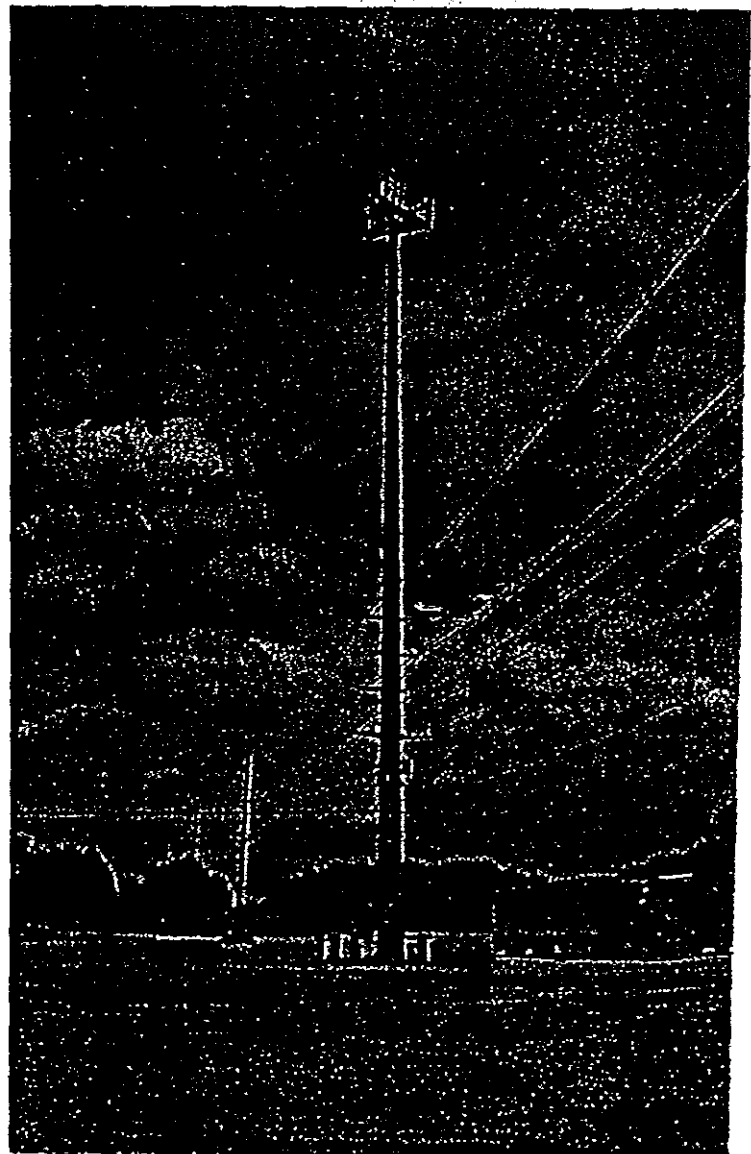
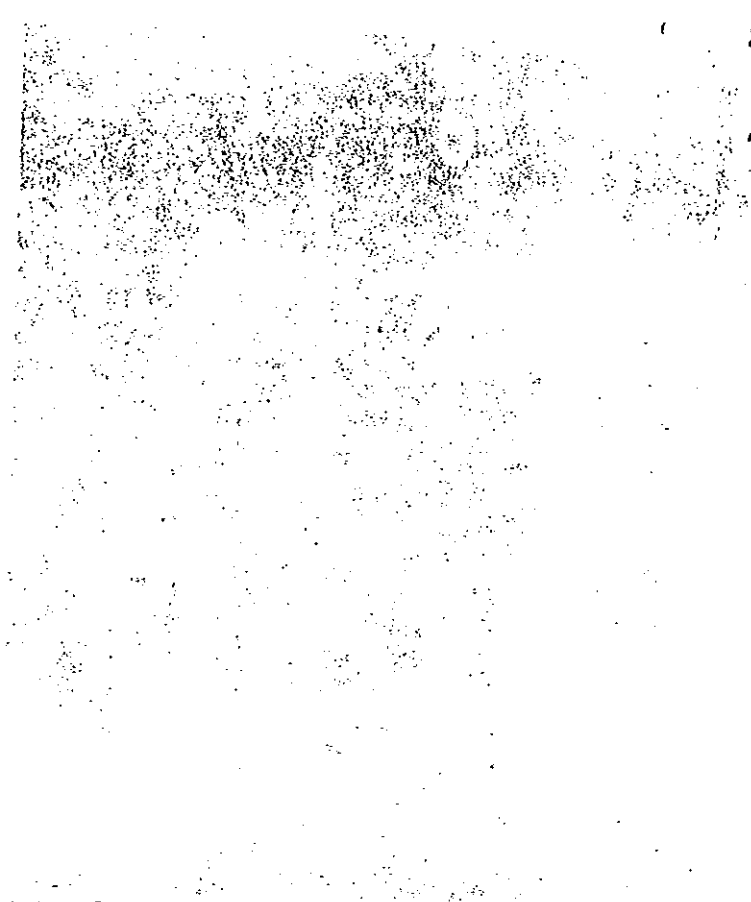
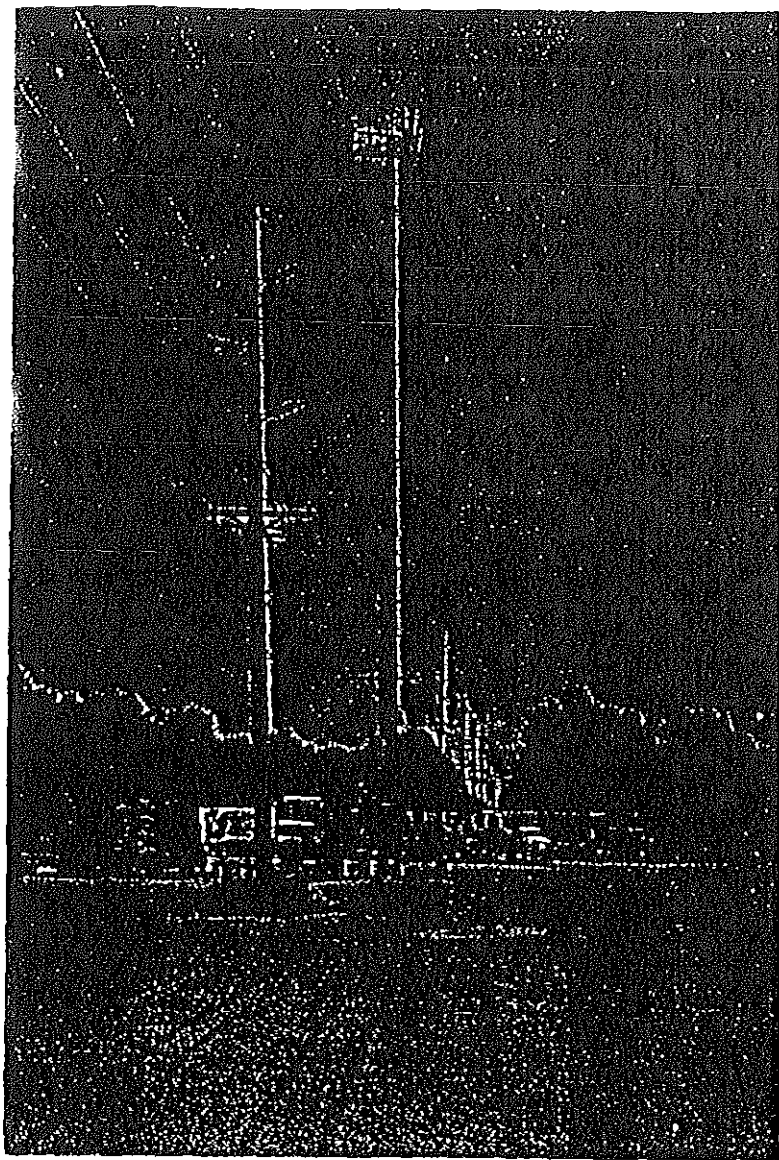
Fax.: 609-625-5804

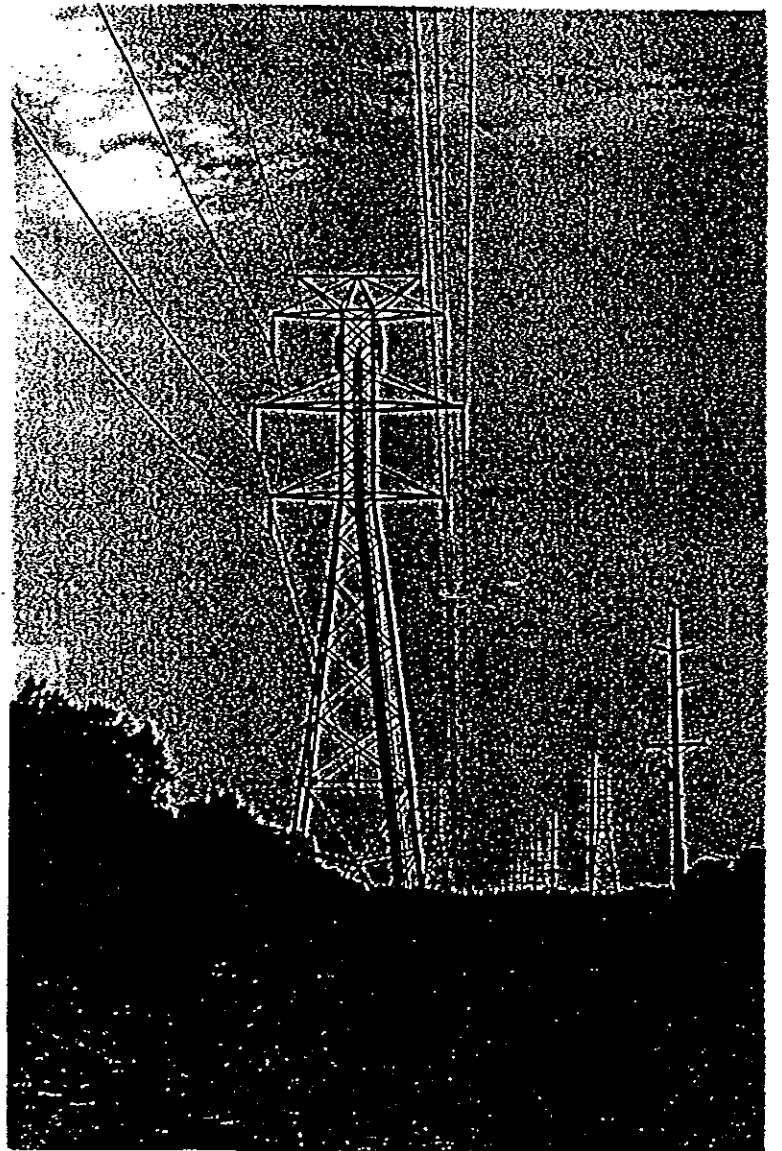
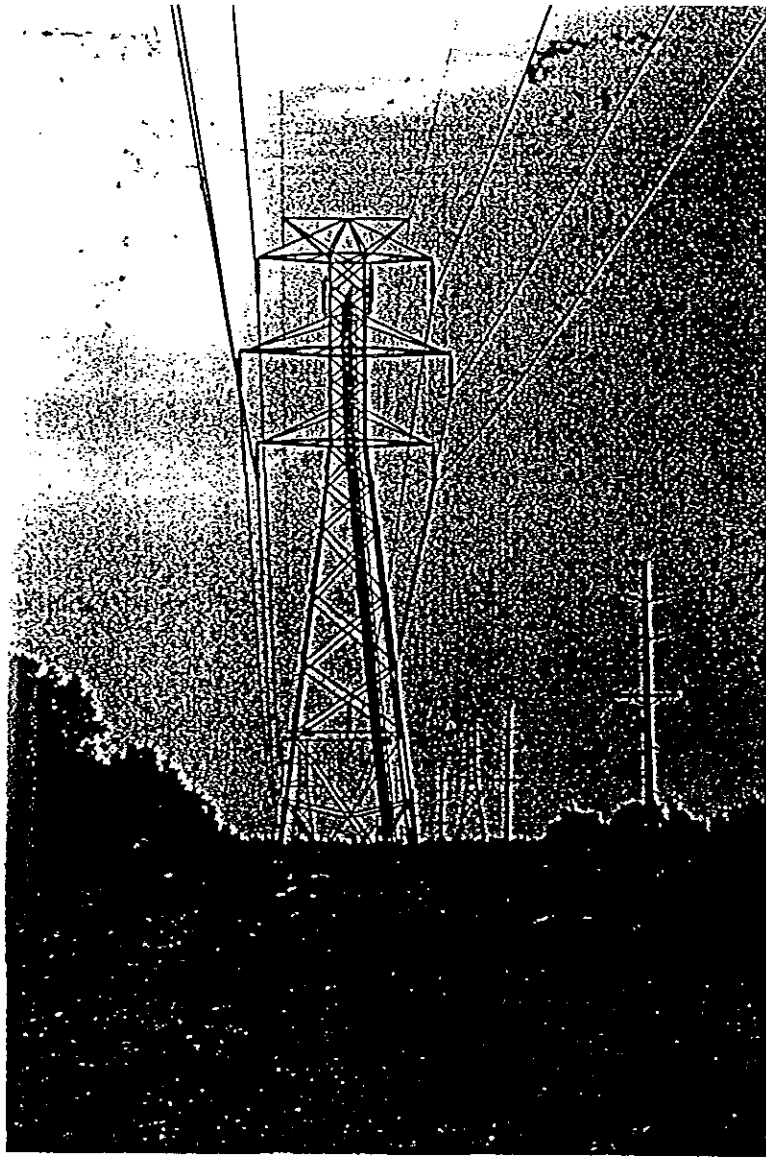


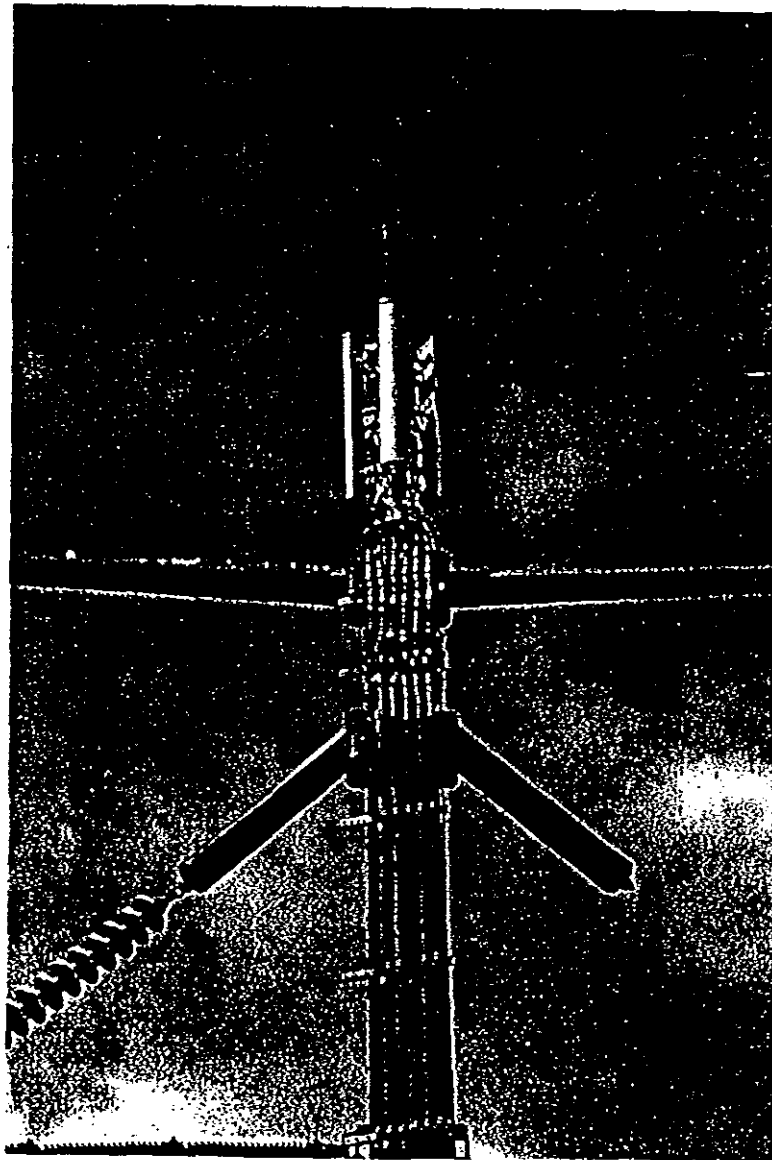
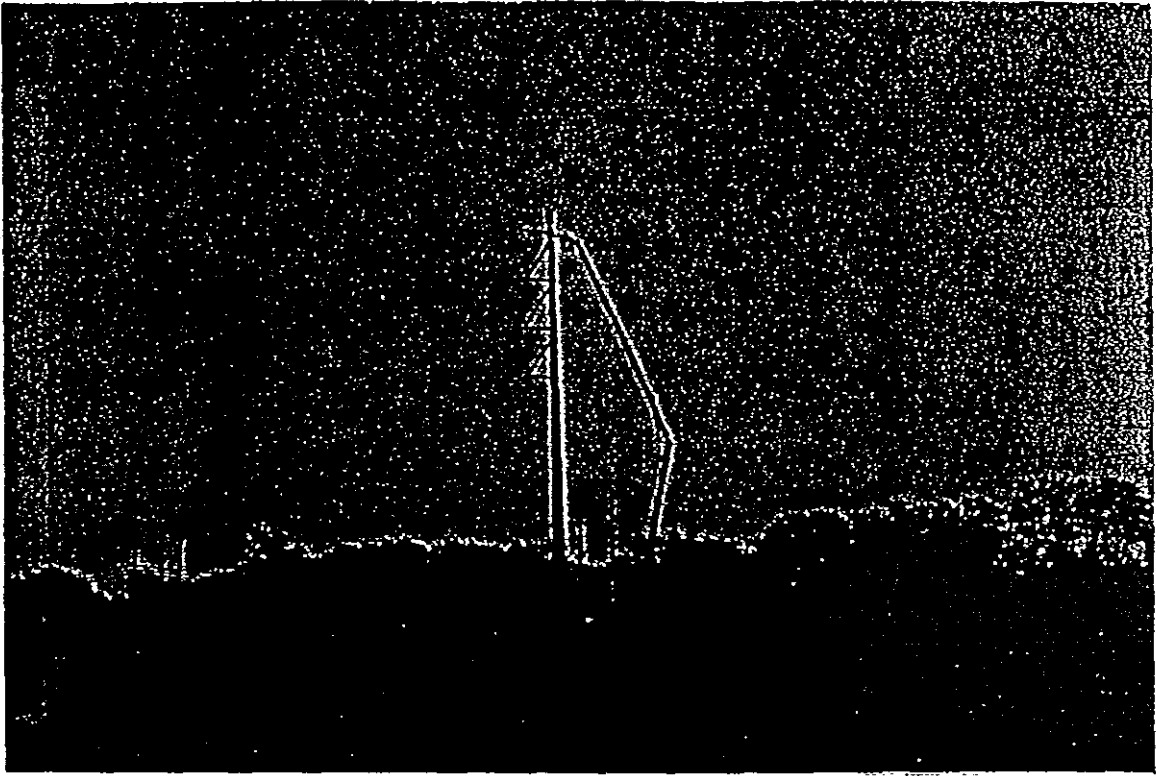


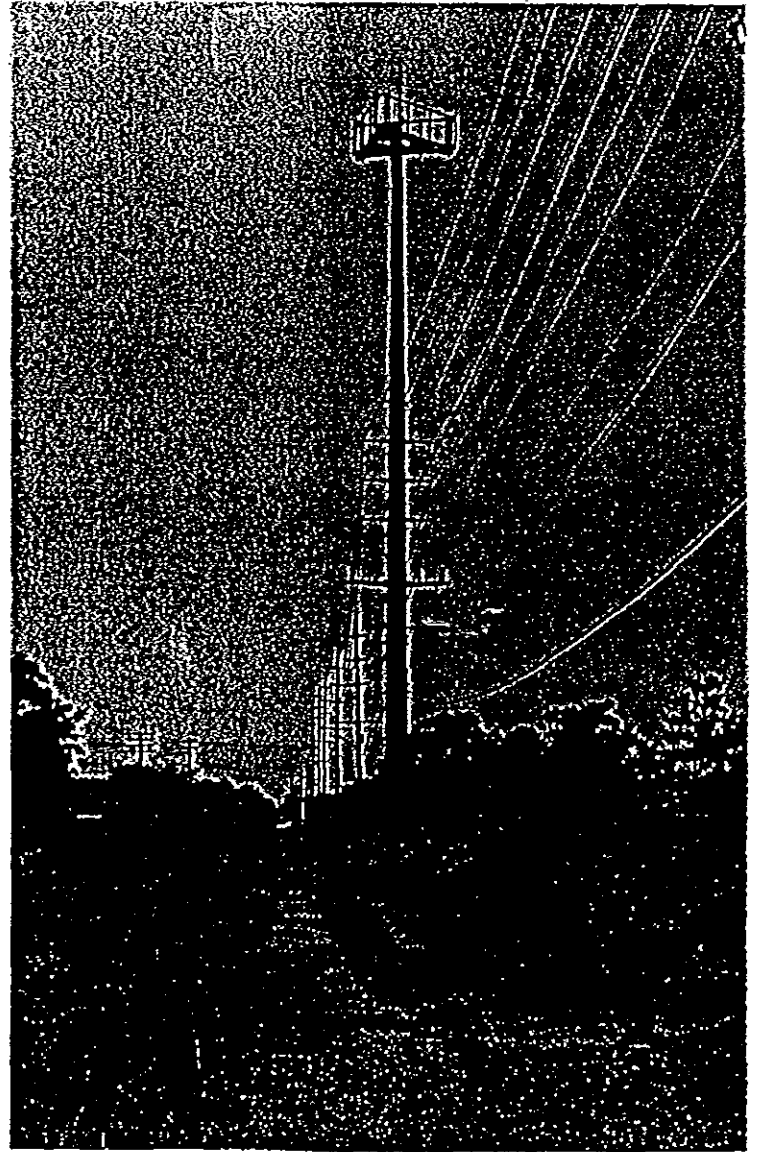
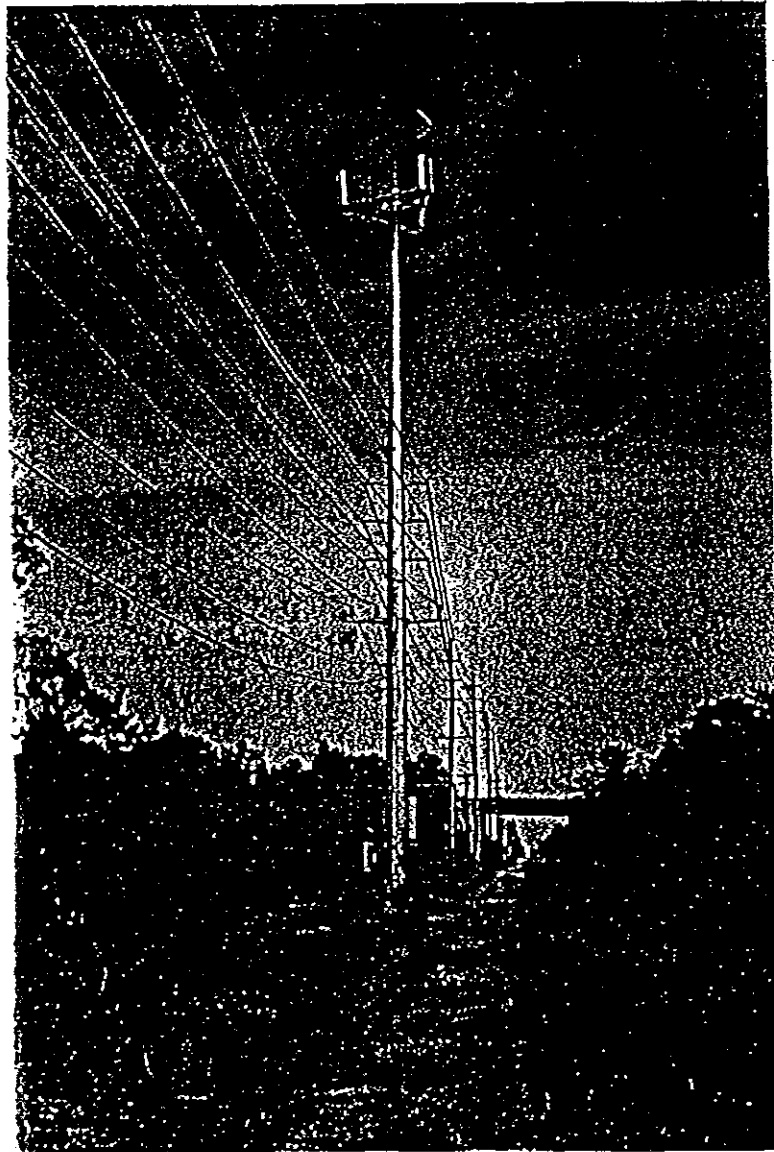
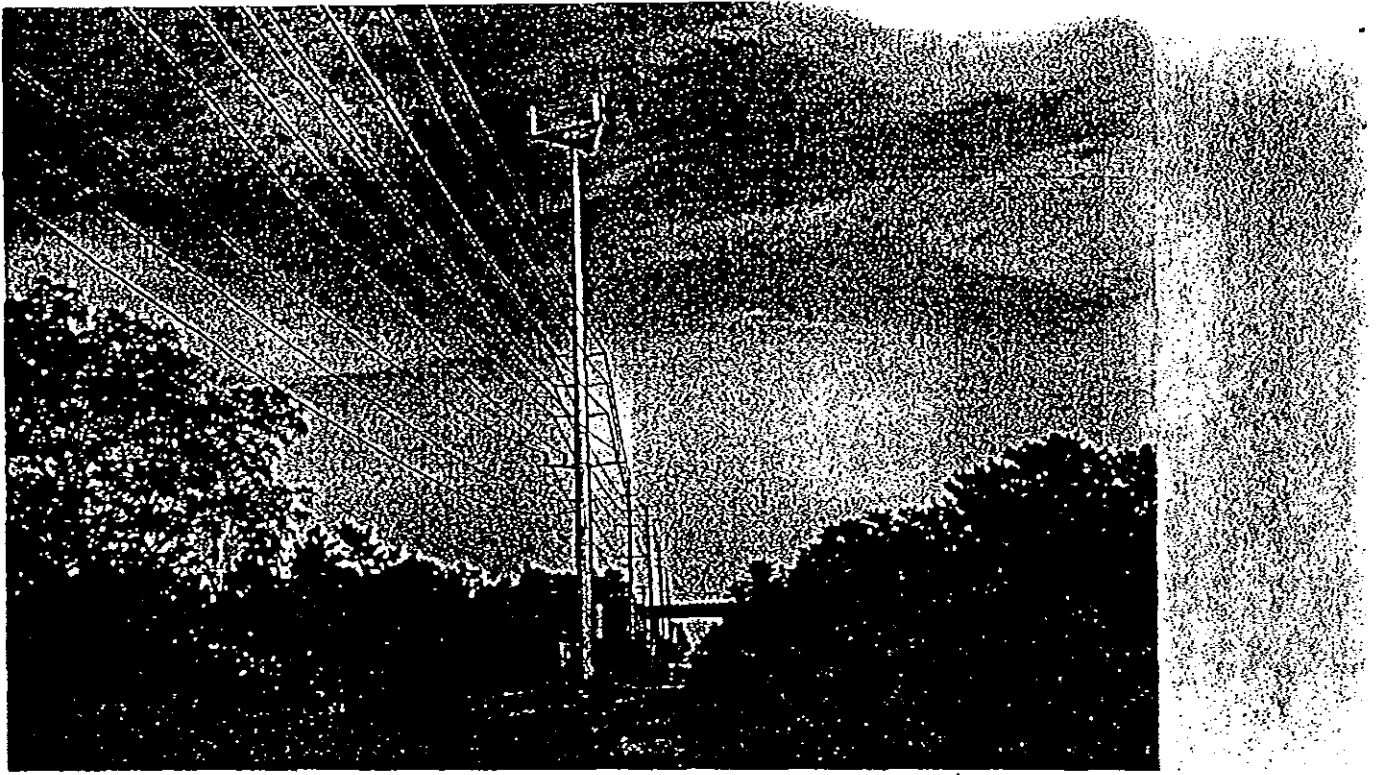


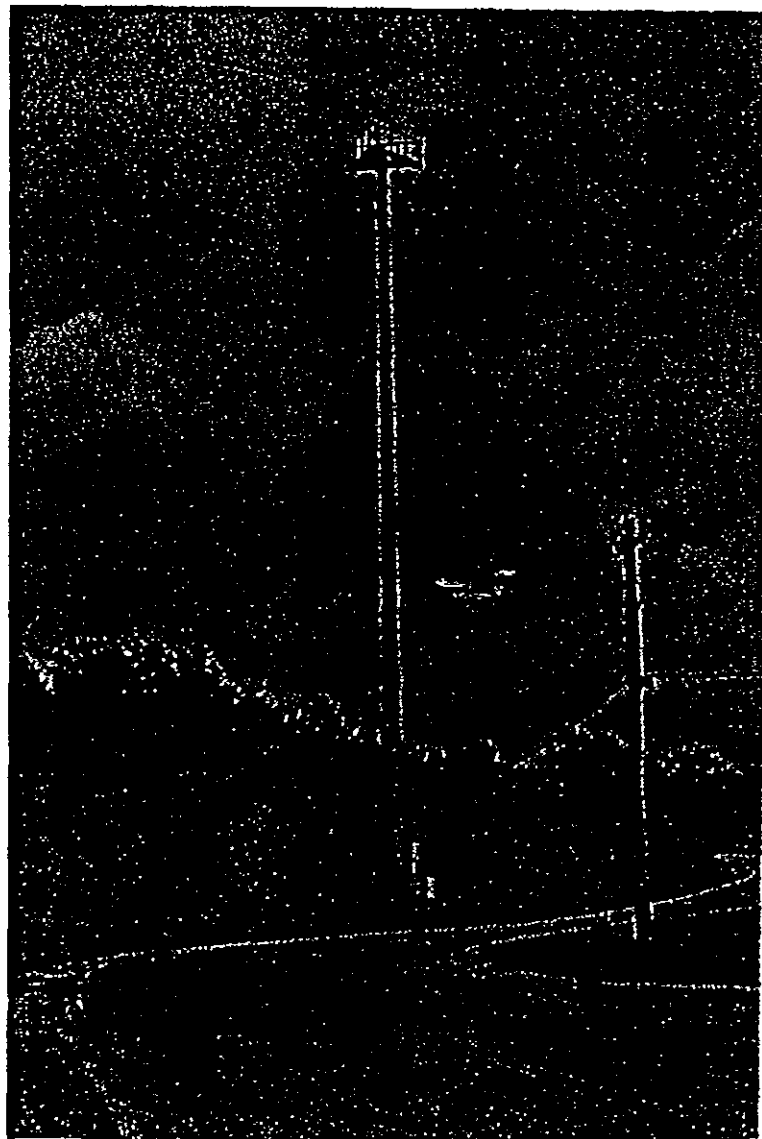
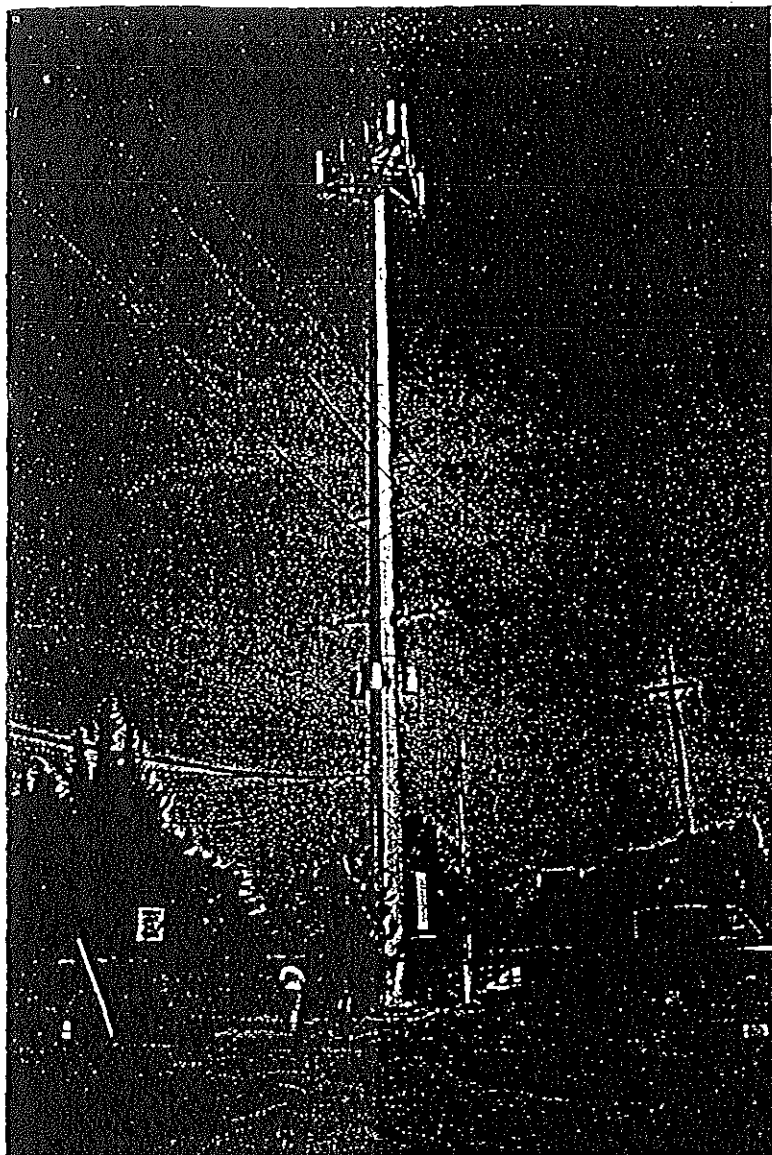


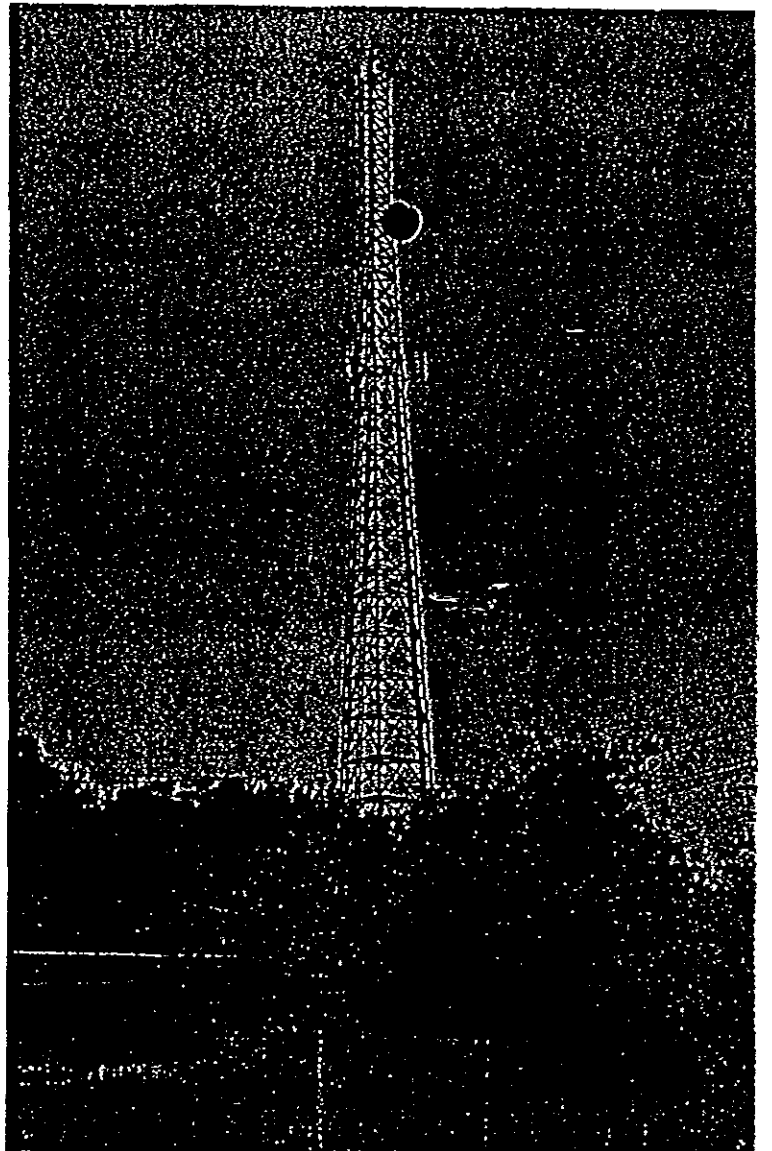
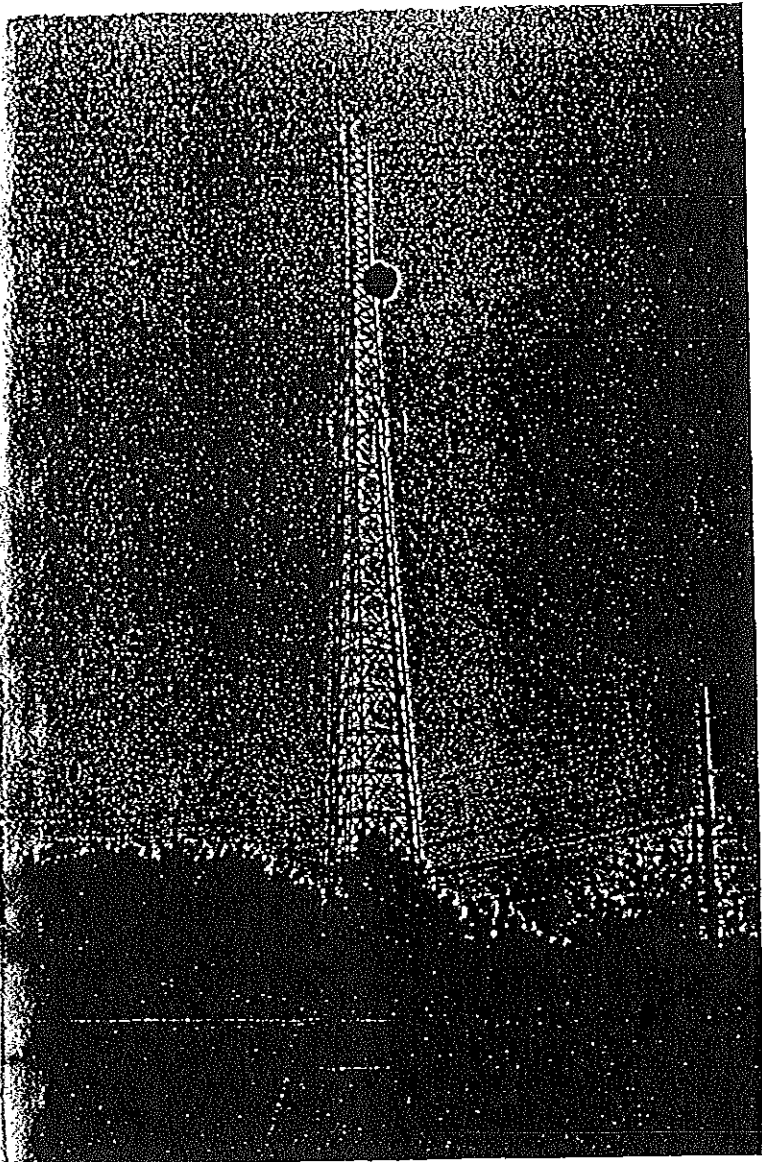












**THE EFFECTS OF THE
TELECOMMUNICATIONS ACT OF 1996
ON THE INFRASTRUCTURE OF
ATLANTIC ELECTRIC**

a conectiv company

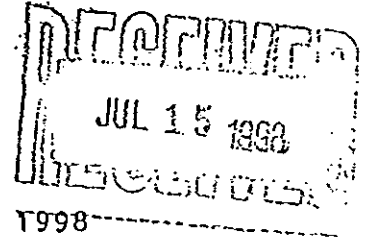
Nicholas K. Salvatore
Atlantic Electric
Real Estate Department

Westampton Township Police Department

710 Rancocas Road • Westampton, NJ 08060-9612

Phone: (609) 267-3000 • Fax: (609) 261-7551

Bert Harper - Chief of Police



July 14, 1998

State of New Jersey
The Pinelands Commission
15 Springfield Road
P. O. Box 7
New Lisbon, New Jersey 08064

RE: Comprehensive Plan for Wireless Communications Facilities
in the Pinelands

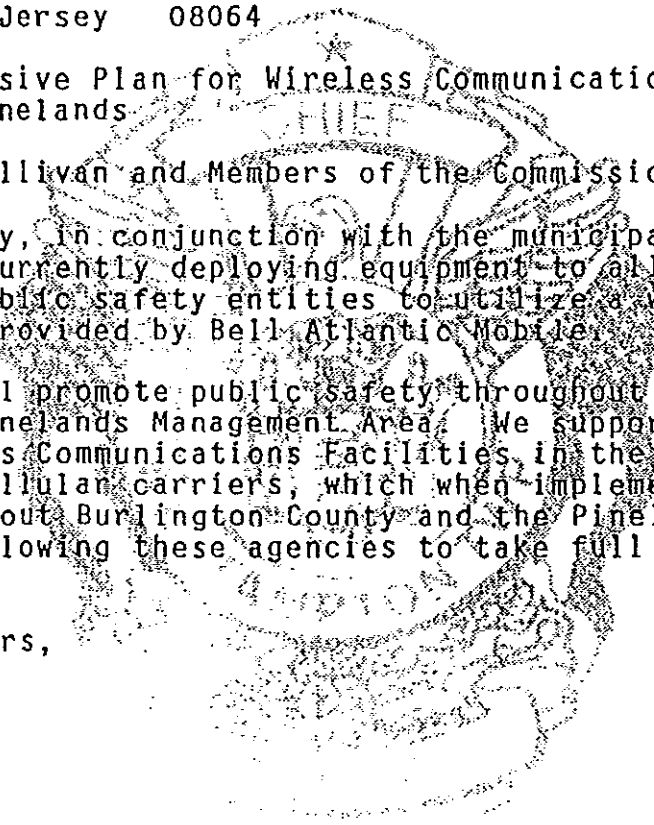
Dear Chairman Sullivan and Members of the Commission,

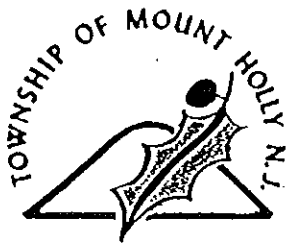
Burlington County, in conjunction with the municipalities throughout the County, is currently deploying equipment to allow various emergency and public safety entities to utilize a wireless data service (CDPD) provided by Bell Atlantic Mobile.

This service will promote public safety throughout Burlington County, including the Pinelands Management Area. We support the "Comprehensive Plan for Wireless Communications Facilities in the Pinelands" submitted by the cellular carriers, which when implemented, will improve coverage throughout Burlington County and the Pinelands Management Area, thereby allowing these agencies to take full advantage of this technology.

Respectfully yours,

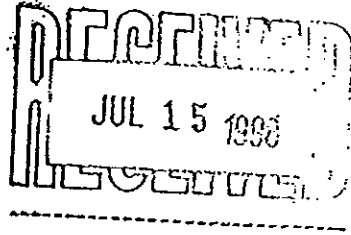
Bert Harper
Bert Harper
Chief of Police





1671

JAMES F. HANSEN, Chief of Police



Mount Holly Township Police Department
P.O. Box 411
23 Washington Street
Mount Holly, New Jersey 08060

POLICE EMERGENCIES
(609) 267-8300

POLICE ADMINISTRATION
(609) 267-0170
FAX: (609) 267-6627

July 14, 1998

State of New Jersey
The Pinelands Commission
15 Springfield Road
P.O. Box 7
New Lisbon, New Jersey 08064

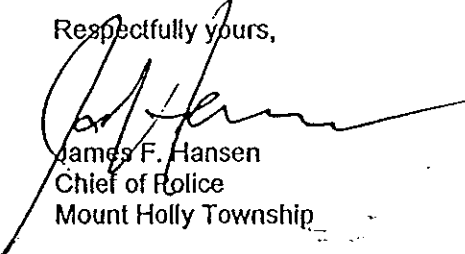
RE: Comprehensive Plan for Wireless Communications Facilities in the Pinelands

Dear Chairman Sullivan and Members of the Commission,

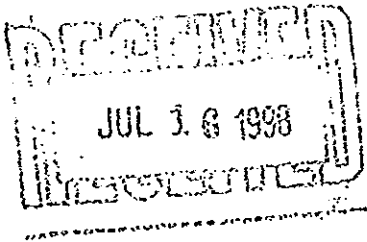
Burlington County, in conjunction with the municipalities throughout the County, are currently deploying equipment to allow various emergency and public safety entities to utilize a wireless data service (CDPD) provided by Bell Atlantic Mobile.

This service will promote public safety throughout Burlington County, including the Pinelands Management area. We support the "Comprehensive Plan for Wireless Communications Facilities in the Pinelands" submitted by the cellular carriers, which when implemented, will improve coverage throughout Burlington County and the Pinelands Management Area, thereby allowing these agencies to take full advantage of this technology.

Respectfully yours,



James F. Hansen
Chief of Police
Mount Holly Township



GALLO GEFFNER FENSTER, P.C.
COUNSELLORS AT LAW
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411 HACKENSACK AVENUE
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TARA L. PHELAN^{*}
LENA V. BALLAS

CERTIFIED CIVIL TRIAL ATTY/
N.J. & N.Y. BAR^{*}
N.J. & PA. BAR^A
N.J., N.Y. & FLA. BAR^D
N.Y. BAR ONLY^{*}

MICHAEL A. GALLO^{*}
STEPHEN A. GEFFNER^{*}
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FRANK M. COSCIA
JAY JOSEPH FRIEDRICH^D
ROBERT A. RECIO
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HERBERT FENSTER
DOUGLAS R. EISENBERG
STEPHEN M. ASPERO^{*}
WILLIAM PAGANO
ROBERT LEVY^{*}
OF COUNSEL

July 13, 1998

The Pinelands Commission
Post Office Box 7
15 Springfield Road
New Lisbon, New Jersey 08064
Attention: Mr. John C. Stokes
Assistant Director

Re: Proposed Comprehensive Plan (Revised) for Cellular
Communications Facilities (hereinafter referred
to as the "Comprehensive Plan")

Dear Commission Members and Mr. Stokes:

In connection with the referenced matter, please be advised that we have been asked to furnish this submittal to The Pinelands Commission (the "Commission") on behalf of GPU Telcom Services, Inc. ("GPU Telcom") and Jersey Central Power & Light Company d/b/a GPU Energy with respect to the Carriers' revised Comprehensive Plan.

GPU Telcom has authorized us to confirm the following to the Commission:

1. We submit a copy of the "Comprehensive Map of Cellular Facilities in the Pinelands Area/March 1998" which was downloaded from the Pinelands internet Web site. In addition to the service territory of GPU Energy and its infrastructure of transmission and other towers noted on Exhibit B of our prior submittal, please note the area highlighted in yellow in the Northeast sector of the Pinelands Area which contains GPU infrastructure available to the Carriers for co-location purposes.

2. We resubmit a copy of our letter to the Commission, dated February 25, 1998 and request that the same be admitted as part of the records and testimony for the Hearing on the revised Plan that commenced on July 9, 1998.

GALLO GEFNER FENSTER

The Pinelands Commission
Post Office Box 7
New Lisbon, New Jersey 08064
Attention: Mr. John C. Stokes
July 13, 1998
Page 2

3. We would request that the Commission receive clear and concise testimony as to why the Carriers have indicated on the Comprehensive Map, depicted by a yellow triangle, that there are proposed cellular sites that "are unlikely to be located on existing structures".

Please allow us to confirm that GPU Telcom remains committed to the utilization of its facilities, equipment and other infrastructure on a fair and reasonable basis, both as to access and cost and, where feasible, on a co-location basis.

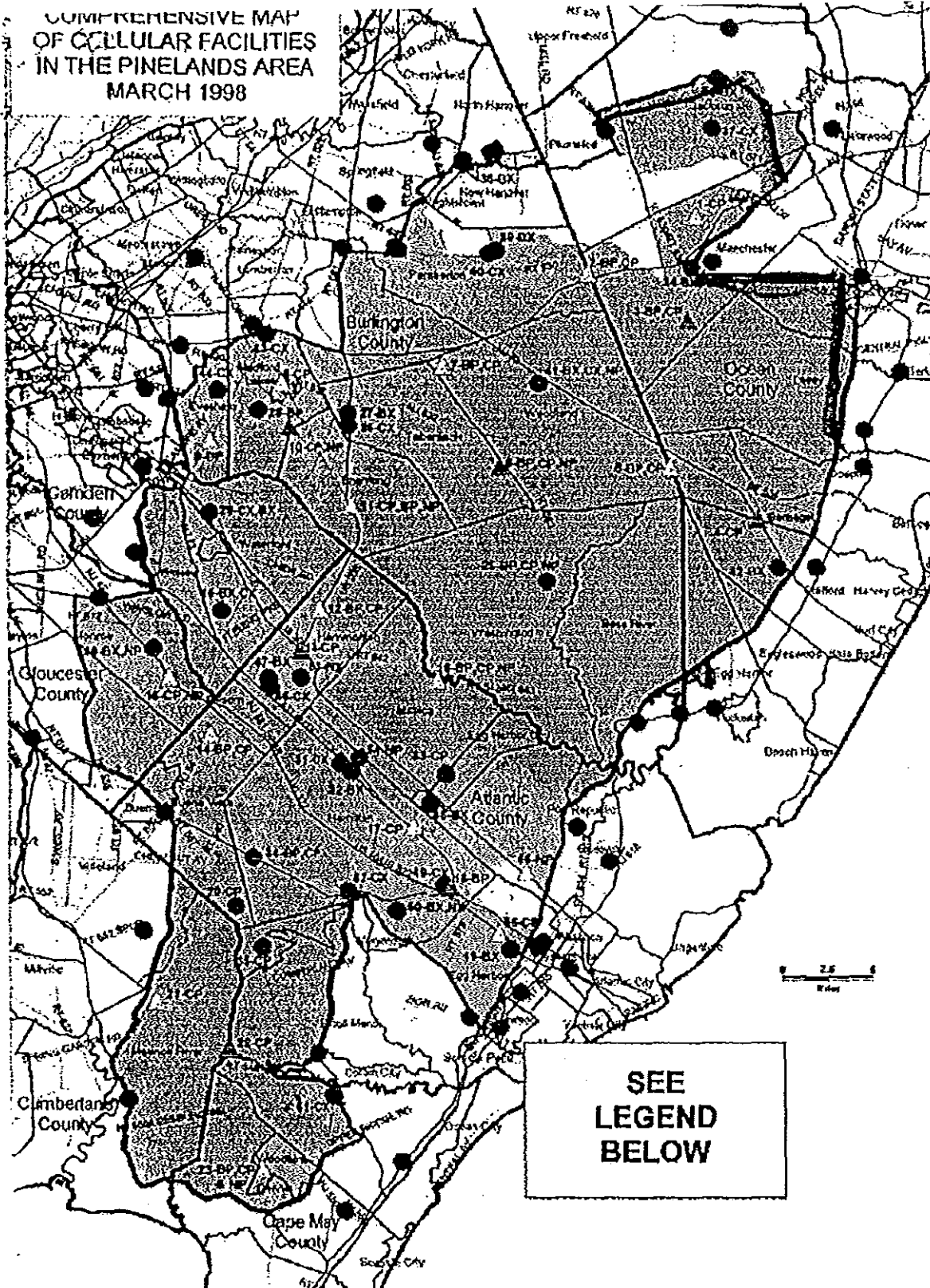
Respectfully submitted,

GALLO GEFNER FENSTER, P.C.

By: 
Stephen M. Aspero

SMA:bms
encls.

COMPREHENSIVE MAP
OF CELLULAR FACILITIES
IN THE PINELANDS AREA
MARCH 1998



GPU ENERGY
TRANSMISSION
LINE

SEE
LEGEND
BELOW

LEGENDS

REGION LEGEND



All Height/Least Number Restrictions Apply
(Preservation Areas, Forest Areas, Special Agricultural
Production Areas and Select Villages)



Height Restricted; Least Number
Restrictions Do Not Apply



(APA, RDA and Select Villages)
No Restrictions Apply
(RGA and Pinelands Towns)

FACILITY LEGEND



Existing Cellular Communications Facilities



Proposed Cellular Communication Facilities
to be Located on Existing Structures



Proposed Cellular Communication Facilities
Which may be Located on Existing Structures



Proposed Cellular Communication Facilities
Which are Unlikely to be Located on Existing
Structures

CELL PROVIDER LEGEND

BX - BAM Existing Cell

CX - Comcast Existing Cell

NX - Nextel Existing Cell

BP - BAM Proposed Cell

CP - Comcast Proposed Cell

NP - Nextel Proposed Cell

KEY LEGEND

 Pinelands Boundary

 Township Boundary

 County Boundary

 Existing Road



GALLO GEFFNER FENSTER, P.C.
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MICHAEL A. GALLO*
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CERTIFIED CIVIL TRIAL ATTY*
N.J. & N.Y. BAR*
N.J. & PA. BAR*
N.J., N.Y. & FLA. BAR*
N.Y. BAR ONLY*

February 25, 1998

The Pinelands Commission
Post Office Box 7
New Lisbon, New Jersey 08064
Attention: William F. Harrison, Esq.

Re: Proposed Comprehensive Plan for Cellular
Communications Facilities (hereinafter
referred to as the "Comprehensive
Communications Facility Plan")

Dear Commission Members and Mr. Harrison:

In connection with the referenced matter, please be advised that we have been asked to furnish this submittal to The Pinelands Commission (the "Commission") on behalf of GPU Telcom Services, Inc. ("GPU Telcom").

BACKGROUND STATEMENT

GPU Telcom is wholly owned by GPU Advanced Resources, Inc. which entity is, in turn, wholly owned by GPU, Inc. GPU, Inc. wholly owns Jersey Central Power & Light Co. d/b/a GPU Energy (herein referred to as "GPU Energy").

As a result of certain agreements between GPU Telcom and GPU Energy, GPU Telcom has the power and authority to convey to third parties by license, including without limitation, cellular/wireless providers, rights to use GPU Energy's electric transmission and distribution utility infrastructure located in State of New Jersey, including the geographical region known as the "Pinelands Area".

In connection with the proposed Comprehensive Communications Facility Plan, please allow us to confirm that GPU Telcom has recently become aware of the efforts by Comcast/Cellular One, Bell Atlantic NYNEX Mobile Systems, Inc. and Nextel Communications, Inc. (collectively, the "Carriers") to satisfy the provisions of N.J.A.C. 7:50-5.4, in particular, subsection (c)6 therein (herein referred to as "Regulation Part 6") and to thereby obtain the

The Pinelands Commission
Post Office Box 7
New Lisbon, New Jersey 08064
Attention: William F. Harrison, Esq.
February 25, 1998
Page 2

consent of the Commission to install up to twenty-five new radio communications towers in the Pinelands Area. In that regard, through the courtesies of others, we have been furnished with copies of various submissions made to the Commission, but we have by no means reviewed all submissions (we understand that certain of the more recent submittals are not yet public). Indeed, neither GPU Telcom nor the undersigned has attended any public meetings held with respect to the referenced matter. To our knowledge, with the exception of Atlantic Energy's letter to Mr. Larry Leggett, dated December 19, 1997, which generally mentioned the co-location interest on the part of GPU Telcom, no written submissions by GPU Telcom have been made by or on behalf of GPU Telcom.

FORMAL STATEMENT

GPU Telcom has authorized us to confirm the following to the Commission:

1. Among other business activities and operational services, GPU Telcom provides telecommunications services and facilities, both for its own account and for license by unrelated cellular, wireless, fiber and other telecommunications providers;

2. GPU Telcom has successfully negotiated, executed and delivered multi-site wireless antenna attachment agreements and licenses with various members of the cellular/wireless community, including Nextel Communications and Comcast, for the use of GPU Telcom's New Jersey and Pennsylvania facilities;

3. To the extent that members of the Commission may be under the mistaken impression that GPU Telcom has been actively negotiating a multi-site wireless antenna attachment agreement with Bell Atlantic Mobile, we respectfully confirm to the Commission that while drafts of such an agreement were circulated and information exchanged with Bell Atlantic Mobile during and after February of 1995, no meaningful negotiations have ever commenced with respect to the either the Pinelands Area or any other regions in New Jersey; however, GPU Telcom remains interested in concluding such an agreement with Bell Atlantic Mobile;

4. In the Pinelands Area alone, GPU Telcom controls and has license rights to, inter alia, approximately 27 miles of utility facilities and infrastructure, including transmission towers (please see Exhibit A and Exhibit B for additional details). In

The Pinelands Commission
Post Office Box 7
New Lisbon, New Jersey 08064
Attention: William F. Harrison, Esq.
February 25, 1998.
Page 3

this regard, it should be noted that steel lattice and tubular transmission towers that support electric transmission lines are installed along the power line at approximately 600 foot intervals. Thus, approximately 225 transmission towers are located in the Pinelands Area alone and are available through GPU Telcom for third-party co-location needs under the to-be-fashioned Comprehensive Communications Facility Plan;

5. Similar to those rights just described, GPU Telcom has rights to utility infrastructure, facilities, transmission and distribution lines that lay immediately adjacent to and just outside the Pinelands Area which are also available to third parties under the to-be-fashioned Comprehensive Communications Facility Plan;

6. Regulation Part 6 requires specific compliance with the condition set forth in subsection 3 of Section 5.4(c) that the new antenna installation "utilizes an existing communications or other suitable structure, to the extent practicable" [emphasis added]. We would respectfully suggest that all GPU Telcom's facilities located in and adjacent to the Pinelands Area constitute both existing facilities and suitable structures (as the same are contemplated under the Regulations), and as such, we believe that it would be appropriate to have the same mapped and made a specific part of the Comprehensive Communications Facility Plan;

7. Regulation Part 6 requires that where more than one entity is providing the "same type of service" that the Comprehensive Communications Facility Plan "shall be agreed to and submitted jointly by all such providers" and shall provide for the "joint construction and use" by all such providers [emphasis added]. Although not defined in N.J.A.C. 7:50-5.4, we believe that the term "provider" includes GPU Telcom; thus, the Commission may wish to determine if GPU Telcom and others similarly situated should be direct participants in this matter. In all events and as contemplated by Regulation Part 6, it is essential that the agreed-to Comprehensive Communications Facility Plan ensure that GPU Telcom has joint access to and joint use of whatever new communications towers the Commission may allow the Carriers or any others to install, and that GPU Telcom (and others similarly situated) also be granted specific co-location rights with respect to all existing communications towers owned by the Carriers and any others and which shall be part of any approved Comprehensive Communications Facility Plan; and

GALLO GEFNER FENSTER

The Pinelands Commission
Post Office Box 7
New Lisbon, New Jersey 08064
Attention: William F. Harrison, Esq.
February 25, 1998.
Page 4

8. We respectfully submit that although the Commission has apparently concluded that broadband PCS cellular providers are not proper parties to the Comprehensive Communications Facility Plan, a decision seemingly based upon the Carriers' and the PCS providers' differing operational radio frequency (RF) ranges, we see no particular distinction made under N.J.A.C. 7:50-5.4 or the Telecommunications Act of 1996 which would justify the classification of PCS providers as other than operators of cellular telecommunications systems for use in providing wireless (cellular) services, the same business as the Carriers' business. Please note that we have generally compared the map of desired sites prepared by Sprint PCS to the map of the Carriers' desired sites prepared by the Commission (please see copies attached as Exhibit C and Exhibit D) and we note a remarkably similar overlap. If Sprint PCS or any other interested broadband PCS cellular provider is made part of the Comprehensive Communications Facility Plan, and to the extent that they are allowed to construct any new antenna structures and facilities in the Pinelands Area, we believe that under the Regulations, the same should be made available to GPU Telcom Services as a co-locator under the to-be-fashioned Comprehensive Communications Facility Plan.

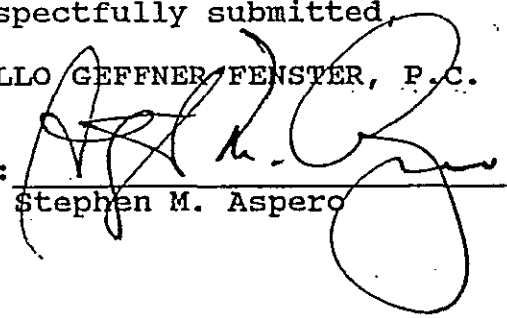
Please allow us to confirm that GPU Telcom remains committed to the utilization of its facilities, equipment and other infrastructure on a fair and reasonable basis, both as to access and cost and, where feasible, on a co-location basis.

In closing, we would ask that the Commission consider allowing GPU Telcom to participate in this matter as a formal party under the applicable Regulations. Pending that determination, we would ask that the undersigned and GPU Telcom be placed on all appropriate notice lists.

Respectfully submitted,

GALLO GEFNER FENSTER, P.C.

By:


Stephen M. Aspero

SMA:bms

EXHIBIT A

Approximate GPU Telcom Facilities Coverage
Distances Between Towns in the Pinelands Area

- | | | |
|----|--------------------------|-------------------------------------|
| 1. | Manitou to Whiting: | 8 miles; 130' tubular support poles |
| 2. | Manitou to Oyster Creek: | 9 miles; Transmission Towers |
| 3. | Glidden locale: | 4 miles; Transmission Towers |
| 4. | Van Hiseville locale: | 5 miles; Transmission Towers |
| 5. | Cookstown locale: | 1 mile; Transmission Towers |



metro and Coastal Regions
TRANSMISSION SYSTEM MAP

Legend

- INTERCONNECTION
- 500 kV TRANSMISSION LINE
- 230 kV TRANSMISSION LINE
- 115 kV TRANSMISSION LINE
- 69 kV TRANSMISSION LINE
- 34.5 kV TRANSMISSION LINE
- GENERATING STATION
- GENERATING STATION, NON-COMPANY OWNED
- 500 kV SUBSTATION
- 500 kV SUBSTATION, NON-COMPANY OWNED
- 230 kV SUBSTATION
- 230 kV SUBSTATION, NON-COMPANY OWNED
- 115 kV SUBSTATION
- 115 kV SUBSTATION, NON-COMPANY OWNED
- 69 kV SUBSTATION
- 69 kV SUBSTATION, NON-COMPANY OWNED
- 34.5 kV SUBSTATION
- 34.5 kV SUBSTATION, NON-COMPANY OWNED
- COUNTY BOUNDARY

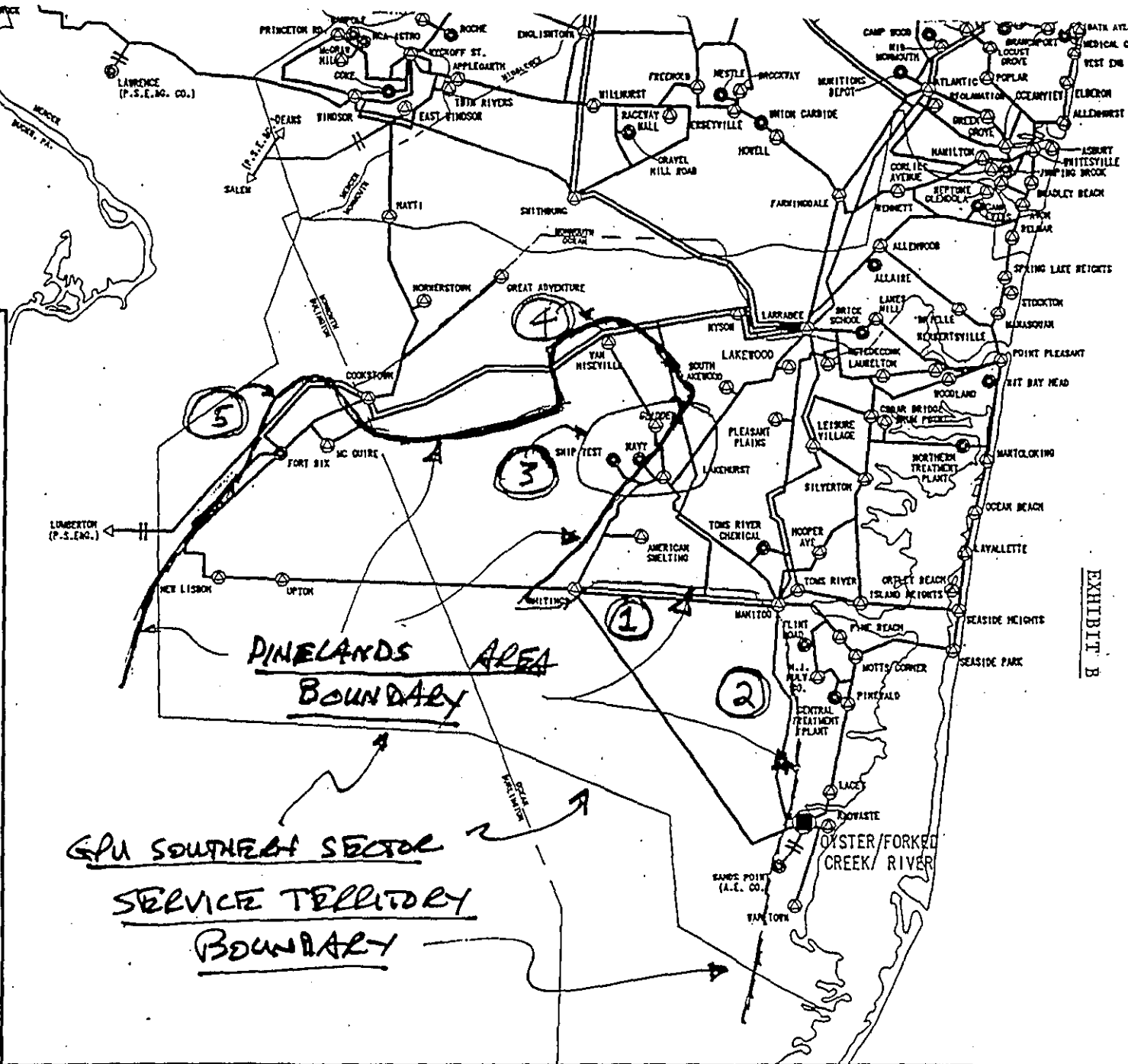
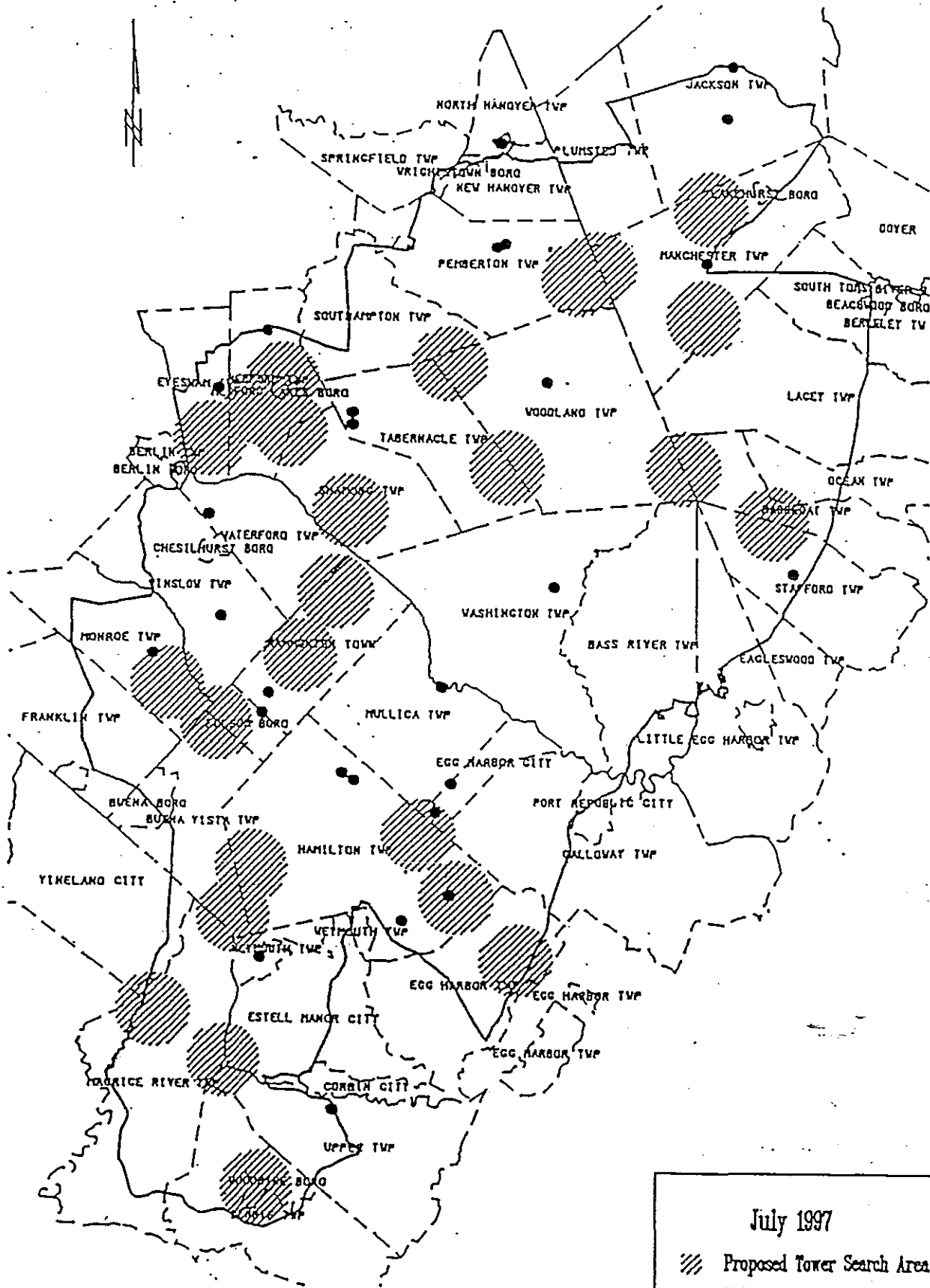


EXHIBIT B

PROPOSED CELLULAR FACILITIES PLAN IN THE PINELANDS AREA

New Jersey Pinelands Commission



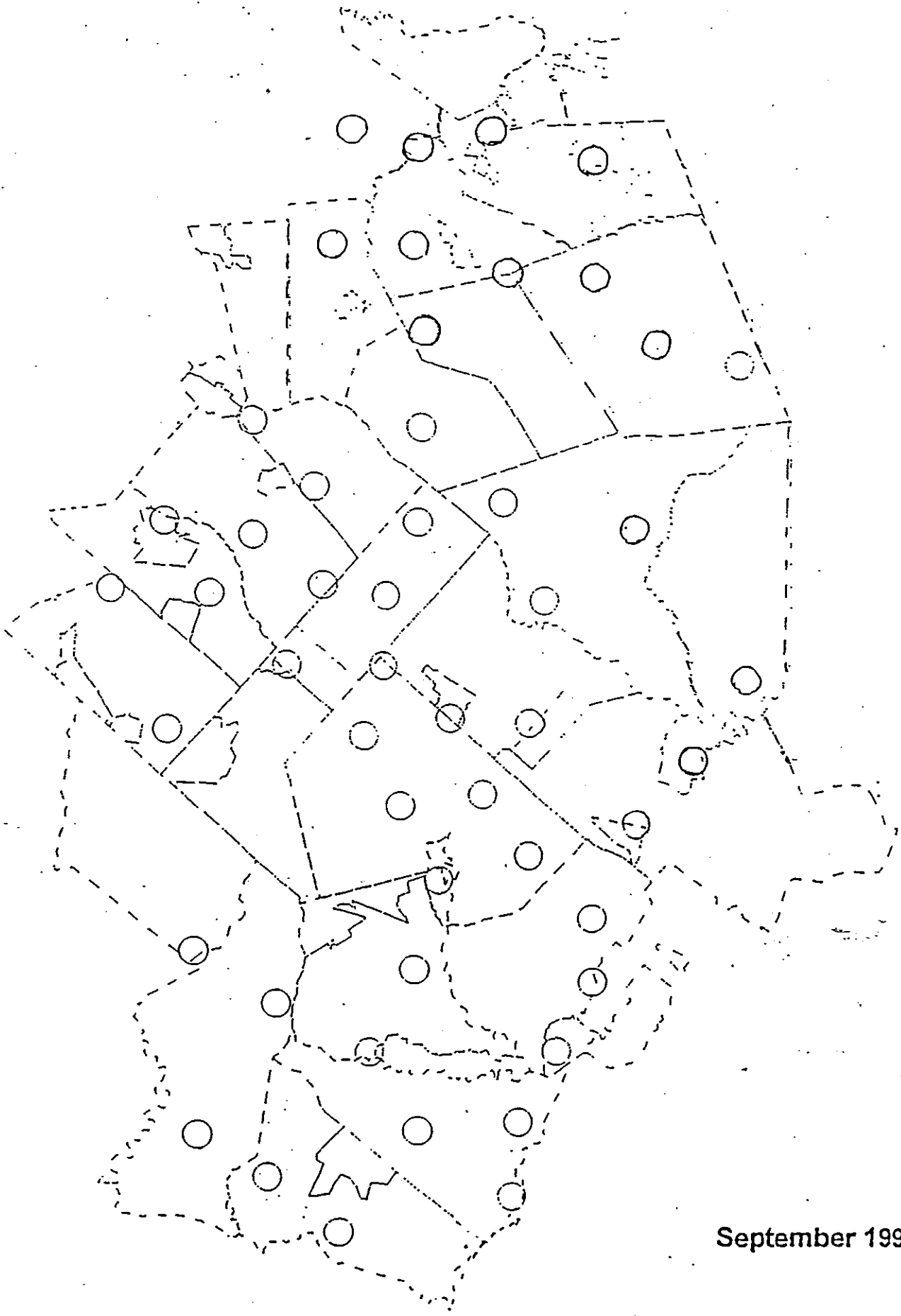
July 1997

- ▨ Proposed Tower Search Area
- Existing Tower Facility
- Pinelands Area Boundary
- - - Municipal Boundaries

Plan map created by Pinelands Commission staff based on information submitted by Bell Atlantic Mobile Systems, Inc., Concept/Collector One and Nextel.
 For further information regarding the proposed Cellular Facilities Plan, please contact Andrea Helms of the Pinelands Commission at (609) 894-3342 or see the Pinelands Commission web page at <http://www.state.nj.us/pinelands/>.

EXHIBIT D

**PROPOSED CELL LAYOUT FOR SPRINT PCS
IN NEW JERSEY PINELANDS**



September 1997

GIORDANO, HALLERAN & CIESLA

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW
125 HALF MILE ROAD

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(609) 695-3900

PLEASE REPLY TO: MIDDLETOWN

DIRECT DIAL NUMBER:

(732) 219-5486

DIRECT E-MAIL:

mgross@ghclaw.com

JOHN C. GIORDANO, JR.
JOHN R. HALLERAN
FRANK R. CIESLA
BERNARD J. BERRY, JR.
THOMAS A. PLISKIN
JOHN A. AIELLO
MICHAEL J. GROSS
RICHARD L. FRIEDMAN DA
GEORGE J. TYLER
JOHN A. GIUNCO
NORMAN M. HOBBS DA
EDWARD S. RADZELY
STEVEN M. BERLIN DA
SHARLENE A. HUNT

NICHOLAS P. KAPUR
LAURA N. ANDERSON
PAUL V. FERNICOLA DA
JAY S. BECKER
TIMOTHY D. LYONS
SEAN E. REGAN
DEBRA J. RUBENSTEIN
MICHAEL A. PANE
J. SCOTT ANDERSON

PHILIP D. FORLENZA
MICHAEL J. CANNING DA
PAUL H. SCHNEIDER
M. SCOTT TASHIY
MICHELE A. QUERQUES
DAVID P. CORRIGAN DA
EDWARD C. BERTUCIO, JR. DA
ANDREW B. ROBINS
MICHAEL A. BRUNO
MARGARET B. CARMELI
KURT E. ANDERSON
PAUL T. COLELLA
STEVEN J. BRODMAN
GERALD P. LALLY

CRAIG S. VIRGIL
CHARLES A. CERUSI
PATRICK S. CONVERY
JACQUELINE DECARLO
GREGORY A. PETROFF
STEVEN M. DALTON
NICOLE DEVANEY
EDWARD C. NORMANDIN

COUNSEL:
ELIZABETH CHRISTIAN
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JOANNE S. GRAY

OF COUNSEL:
S. THOMAS GAGLIANO

JOHN C. GIORDANO
(1921-1949)

DA CERTIFIED CIVIL
TRIAL ATTORNEY

DA CERTIFIED CRIMINAL
TRIAL ATTORNEY

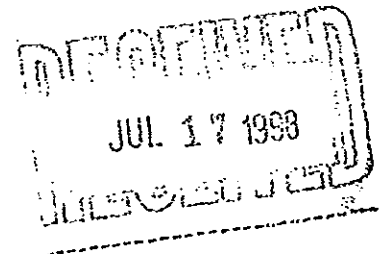
CLIENT/MATTER NO.

9164/006

July 16, 1998

VIA LAWYERS SERVICE #8573761

Terrance Moore, Executive Director
Pinelands Commission
15 Springfield Road
P.O. Box 7
New Lisbon, NJ 08064



Re: Comprehensive Plan for Wireless Communication Facilities in the Pinelands –
Response to Public Hearing Comments

Dear Mr. Moore:

On behalf of Bell Atlantic Mobile, Comcast Metrophone/Cellular-One and Nextel Communications, Inc., (the “Cellular Providers” or “CPs”) we herewith submit a response to several of the comments made at the July 9, 1998 public hearing, as follows:

1. There were substantial comments related to individual proposed sites. The CPs fully recognize that notwithstanding the contents of the Comprehensive Plan, applications for individual sites must be made to the Pinelands Commission and municipalities. During the course of those applications, the CPs will carefully evaluate and reevaluate the location of each facility to be certain that it meets the siting criteria of the Pinelands Commission Regulations to the maximum extent practicable. If this means moving an originally proposed location, this will be considered.

2. There was testimony questioning the need for new cellular facilities. Aside from the anecdotal evidence presented at the hearing, more importantly the CPs formulated radio plots, which were reviewed by Pinelands Commission staff and consultants. We believe that these radio plots verify the need for the proposed facilities. Although these radio plots are proprietary for planning purposes, they are disclosed when individual site applications are made. Additionally, the CPs maintain that the establishment of technical need for service lies within the sole jurisdiction of the FCC.

Terrance Moore, Executive Director

July 16, 1998

Page 2

3. A statement was made that there are electrified fences around the facilities. We would like to clarify the record and state categorically that there are no electrified fences around our facilities, either existing or proposed.

4. There was an allegation of potential groundwater contamination. There are over 17,000 cell sites nationwide and there has been no identified groundwater problem caused by installation of foundations for towers. In addition, the CPs will follow all construction code requirements. An issue was also raised that lightning might strike fuel sources stored at facilities. There has never been a fire at any of our 4,000 facilities caused by lightning strikes and the commenter did not reference any specific instances.

5. Issues concerning noise and light impacts were raised. These are dealt with in the site planning process and are governed by local ordinances.

6. There was opposition expressed to towers in the Preservation & Forest Areas. The Pinelands Commission regulations specifically contemplate towers in those areas. Furthermore, cellular customers are entitled to service wherever they are, whether it be in the Preservation Area or the Regional Growth Area.

7. There were some comments indicating that the proposed locations of these facilities were not specific enough and were only approximate. The proposed approximate locations comply with the Pinelands Commission regulations at N.J.A.C. 7:50-5.4(c)6, which only requires the plan to provide approximate locations of all proposed facilities. This recognizes the business realities of attempting to site cellular facilities as well as the fact that this is a five to ten year master plan.

8. There were concerns raised that the removal of one facility from the plan would impact all other facilities. The CPs have taken into account impact on adjacent facilities. The removal of one facility or the relocation of one facility will not impact all other facilities. Furthermore, the CPs are required by their FCC License and the Telecommunications Act of 1996 to service the entire Pinelands Area.

9. There was a concern raised as to the impact of cellular towers on military flights. All proposed site locations must be filed with the Federal Aviation Administration for review and approval.

10. Merely to clarify the record, the height of site 7 is proposed at 180 feet and is designed to expand to 200 feet. We have no knowledge of the origin of the 318 or 368 feet referenced at the public hearing.

GIORDANO, HALLERAN & CIESLA
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW

Terrance Moore, Executive Director
July 16, 1998
Page 3

11. There was a reference to satellite technology. This is responded to in the Comprehensive Plan. This technology is not commercially available and the CPs cannot wait for future technology since their FCC license requires adequate service at the present time.

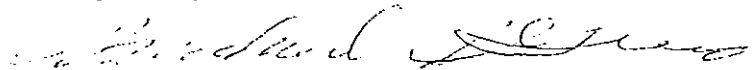
12. There was an inference that the CPs did not want to site their facilities on existing Atlantic Electric towers. Not all CPs have fully negotiated leases or contracts with Atlantic Electric. We will consider Atlantic Electric structures for any proposed location, if they are practicable, as defined in the Comprehensive Plan.

13. There was a reference to a charge of \$6,000-\$7,000 per month to certain emergency service providers for colocation on the CP's towers. The CPs do not charge emergency service personnel rental fees for use of the tower structures throughout the Pinelands.

14. There was an allegation that the construction of these facilities causes a reduction in property values. There is no case of which we are aware that holds that cellular facilities cause a reduction in property values.

We greatly appreciate the opportunity to respond to some of the comments raised at the public hearing and look forward to a favorable recommendation to the Commission. Thank you for this opportunity to comment.

Respectfully submitted,

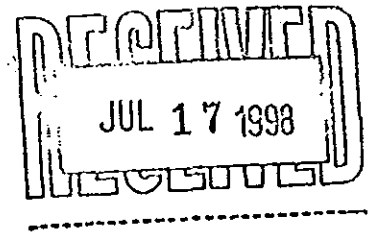


MICHAEL J. GROSS

MJG/ew

Borough of Woodbine

Municipal Building
809 Franklin Street
Woodbine, New Jersey 08270
(609) 861-2266
FAX: 861-2529



William Pikolycky
Mayor

Michael E. Benson
Solicitor

Frances P. Pettit
Clerk/Collector

July 15, 1998

Please reply to:
Michael E. Benson, Esquire
BUONADONNA, BENSON & PARENTI
1138 East Chestnut Avenue
Vineland, New Jersey 08360

The Pinelands Commission
P.O. Box 7
New Lisbon, NJ 08064

ATTENTION: TERRENCE MOORE, EXECUTIVE DIRECTOR

RE: COMPREHENSIVE PLAN FOR WIRELESS COMMUNICATIONS FACILITIES IN
THE PINELANDS

Dear Mr. Moore:

As Solicitor for the Borough of Woodbine, I am submitting this correspondence as follow up comment with regard to the Commission's cellular communications hearing held on July 9.

As you know, the Borough of Woodbine has expressed substantial concern over the originally planned location for a cellular tower in Woodbine. The location was Block 99, Lot 1, on Hamilton Avenue, in a region designated by Pinelands as Rural Development Area. The site is referenced in the Comprehensive Plan as Facility 23. The Borough of Woodbine considered the area inappropriate for such development, not in conformance with the Commission's standards for development in such region, and, moreover, the Borough stressed that there were existing structures available for siting a cellular antenna.

The new Comprehensive Plan submitted by the industry reflects that Bell Atlantic Mobile proposes relocating its facility from the restricted Rural Development Area to the unrestricted Regional Growth Area in Woodbine. The Plan does not yet specify a particular site, but it is clear that the Plan contemplates the construction of a new tower, since Facility 23 is described under that portion of the Plan entitled "Proposed Cellular Communication Facilities Which Are Unlikely To Be Located On Existing Structures." (See page 3 of the proposed Plan.)

While the Borough encourages avoidance of development in the Rural Development Area, it remains concerned that the Plan still ignores existing structures for location of a cellular antenna. The most obvious and relevant structures would appear to be the Borough's water tower as well as a State Police communications tower. Of

The Pinelands Commission
ATTENTION: TERRENCE MOORE, EXECUTIVE DIRECTOR
Page -2-
July 15, 1998

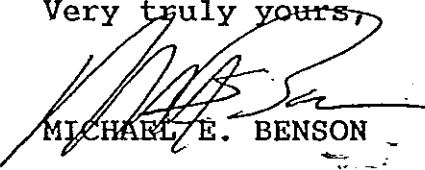
particular interest is the reference in the Plan, or Facility 23, to co-locating Comcast and Nextel with Bell Atlantic. Nextel has, in fact, negotiated with the Woodbine Municipal Utilities Authority (owner of the water tower) and agreed to locate its cellular antenna on the water tower. Attached hereto is a copy of correspondence dated July 8 from Cari Russo of Nextel addressed to the Solicitor for the Woodbine MUA reflecting that the Lease Agreement for the use of the water tower is being processed for final execution. Also attached is a copy of correspondence dated July 13 from Robin van Laer of Nextel reflecting that the Lease Agreement for the use of the water tower has been fully executed.

We firmly believe, and it is particularly underscored by the Lease Agreement with Nextel, that the Borough's existing water tower is a more than adequate facility for cellular requirements in the Woodbine area. We are further informed that Nextel is negotiating a location for a tower with the Township of Dennis. While it is our understanding that the proposed site (at or near the existing Township municipal complex) is outside the jurisdiction of the Pinelands Commission, it is clear that such a site, if utilized by Bell Atlantic, would more than sufficiently cover whatever concerns Bell Atlantic may have for extension of service through the Dennis Township area.

In light of the above, we would urge the Pinelands Commission to require that the industry more comprehensively explore the use of existing tower structures in the Borough, such as outlined above.

Thank you for your kind consideration.

Very truly yours,



MICHAEL E. BENSON

MEB:sjd
Enclosures

cc: Mayor William Pikolycky
Chairman Steve Zenyuk, Woodbine Planning/Zoning Board
William F. Harrison, Esq., Asst. Director, Project Review



Nextel Communications
Three Greenwood Square
9329 Street Road
Bensalem, PA 19020
215 633-6300 FAX 215 633-6340

July 8, 1998

Richard H. Daniels, Esq.
211 Buck Street
P.O. Box 727
Millville, NJ 08332

Re: Nextel/Woodbine Agreement


Dear Mr. Daniels:

Thank you for sending me the executed copies of the Agreement. Our property manager, Robin van Laer is processing those leases and will return two fully executed copies to you. Also you will receive a letter of introduction from her. She will be the point of contact for the MUA once my duties are complete.

Enclosed please find a set of drawings I believe address all the requirements in your letter of July 1. Please have your engineer review these as soon as possible. As soon as we have a written review and acceptance letter from your engineer, we will submit our application to the Pinelands.

As you review the attached plans, please call me with your questions and comments. You can reach me on my desk line at 215.633.6597 or on my cellular line at 215.416.3797.

Sincerely,


Carl Russo



Nextel Communications
Three Greenwood Square
3329 Street Road
Bensalem, PA 19020
215 633-6300 FAX 215 633-6340

July 13, 1998

To Whom It May Concern:

Please find enclosed, a fully executed Lease Agreement and a Certificate of Insurance for your records.

Please provide me with any keys and/or special access requirements pertaining to the leased premises at your earliest convenience (if any). Also, please provide me with an after hours emergency contact and telephone number.

If you have any zoning or construction related questions, please refer them to your leasing contact. I am the Property Manager whom will be managing this site after to construction process is complete.

We look forward to a mutually beneficial relationship with you.

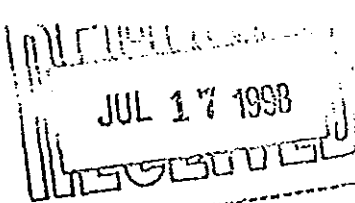
Sincerely,

A handwritten signature in cursive script, appearing to read "Robin van Laer".

Robin van Laer
Mid-Atlantic Region Property Manager

Enclosures

Thomas Glynn



4772 Pleasant Mills Road
Hammonton NJ. 08037

E-mail tpglynn@bellatlantic.net

July 16, 1998

Dear , Commissioners

I would like to add the following comments to the testimony I gave at the hearing in Mays Landing on July 9. If you follow the regulation 7.50-5.4 as it is now written , the siting of tower 16, as proposed by Bell Atlantic, to site the tower on the property of the Sweetwater Vol. Fire Company, would violate several of the provisions of this regulation. Section c- subsection v states the tower must minimize visual impacts as viewed from existing residential dwellings located on contiguous parcels. Placing this tower between my dwelling and the fire house is hardly minimizing visual impact. This siting would also impact various other dwelling in the area, but since the plan had not been approved, or the site submitted, I thought the existing regulations would prevail in preventing the siting of this tower at this location. It seems I was probably mistaken, as I have observed soil testing and various other preliminary steps that must be taken before building any structure. I am concerned that this tower will be placed between my septic system and the system for the Fire house. At the present time, the septic for the fire house is experiencing problems and building a retention basin, as included in the plans, would only add to these problems and possibly affect my system. I am also concerned if there is a fall zone connected with these towers. If so, my dwelling would be within the 200 or even 150 feet of a tower at this site.

I consider the area where I reside, one of the more scenic and fragile pieces of the Pines. I live within 400 yards of the Mullica River, at the confluence with the Batsto river. In keeping with the provision in 7.50.5.4, the towers must minimize the visual impact to specified river corridors and to areas of low intensive recreation . I feel this site does not qualify in either regard.

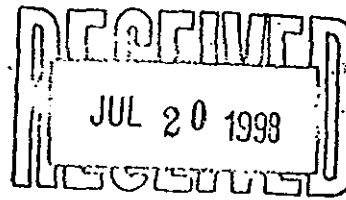
I attended a plan review at the fire house where the representative from Bell Atlantic stated that this site would not require them to construct any roads or run utilities. The cost to the providers of cellular service should not be a consideration to the CMP, as they are the ones asking to construct these towers. I realize that they must be cost effective, but not at the expense of the pinelands or to property owners affected by this construction.

There are other sites within the radius of five miles, and many sites closer than five miles, that would comply with the guidelines cited in 7.50.5.4. I would ask the Commission to keep these considerations in mind when approving or disapproving the CMP, and if approved, the specific sitings.

The Mullica River is enjoyed by many people, both from N.J. and elsewhere. It deserves our protection and does not need the intrusion of technology, in the form of towers, to its many wonderful and scenic views.

Thank You

Thomas Glynn



FAXED
7-16-98

July 16, 1998

Jack J. Salemi
5 Bridlewood Ct.
Tabernacle, NJ 08088

Mr. Terrence Moore
Mr. John Stokes
Pineland Commission
P.O. Box 7
New Lisbon, NJ 08064

Dear Mr. Moore & Mr. Stokes,

Thank you for the opportunity to testify at the July 7, 1998 Mays Landing Cellular Tower meeting.

Can you please have the industry provide the exact engineering data used to determine each site location proposed in their new plan, especially site #7 at Ward Sand and Gravel Co., located in Chatsworth, Woodland Twp. NJ.

I strongly feel that this site should be moved out of the Pristine Preservation Forest area, as proposed now, and constructed at Rt. 206 and Rt. 70, at the Dept. of Transportation. We have existing comcast cellular service here now.

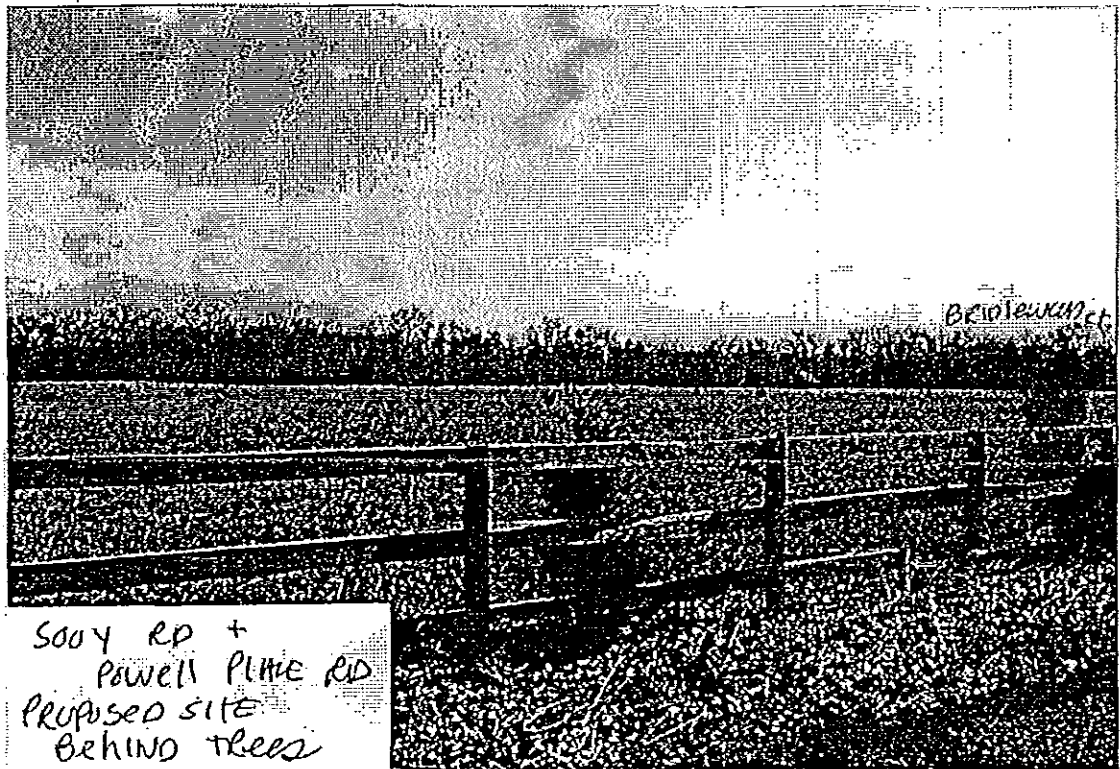
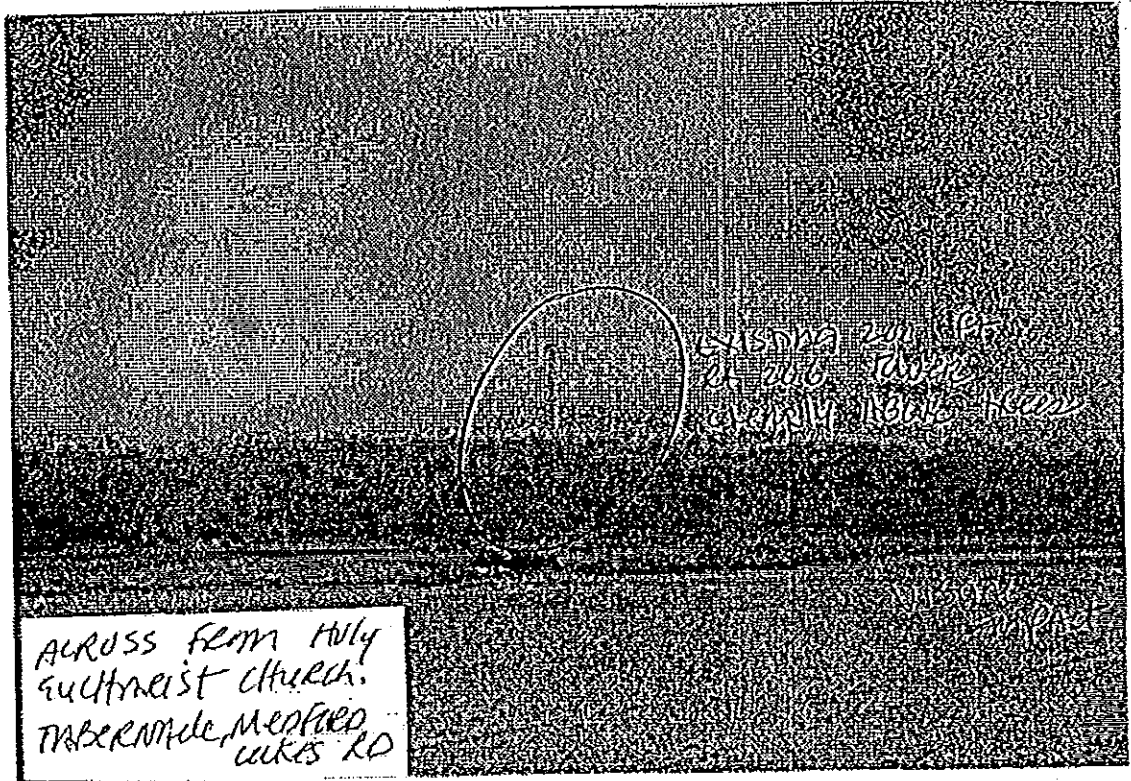
I am amazed at why the cellular industry plans do not unite with the Atlantic Electric Co. existing structures or any other existing structures for co-habitation. Their greed and ignorant direction concerning co-habitation and doing what is right for the industry development will cause the public to constantly battle their direction.

Please keep me informed of all developments concerning this issue. I greatly appreciate your strong stand on Preserving our Beautiful Pristine Pineland Forest region.

Sincerely,

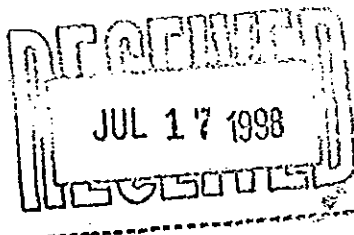
A handwritten signature in cursive script, appearing to read "Jack J. Salemi". The signature is written in dark ink and is positioned above the printed name.

Jack J. Salemi



Also enclosed was a copy of "The Effects of
the Telecommunications Act of 1997 on the
Infrastructure of Atlantic Electric" distributed at
P.L. Hearin July 9, 1998 - appears previously in this
document

The Pinelands Commission
P.O. Box 7
New Lisbon, N.J. 08064



July 16, 1998

A letter to the Pinelands Commission concerning
Cell Site Designation PHI-EVE2, Application # 980272.01

I am writing this letter to implore you to reject the Bell Atlantic Mobile proposal to construct a cellular communications tower in the Little Mill Acres residential development in southern Evesham township. The proposed 200' high tower would rise up approximately 100' feet away from the home of one neighbor, 200' from the home of another neighbor, and about 300' from my home. Our pristine Pinelands residential community of about 50 upper-middle-class homes would suddenly have a skyline dominated by this tower.

After first hearing of this proposed tower 3 weeks ago, I was directed to the Pinelands Commission web site where an excerpt from the 'Comprehensive Plan for Wireless Communications Facilities in the Pinelands' was published. This document described the Cellular Providers plan to improve the quality and range of their cellular service throughout the Pinelands, and the Pinelands Commission's regulations to ensure minimum impact to the Pinelands area. Regulation 7 requires that the Cellular Providers use existing structures wherever possible. Regulation 8 requires that when a new tower must be built because there are no viable alternatives, that tower is to be sited to avoid visual impacts to scenic areas and residential areas.

While not an expert in analog cellular technology, as Network Manager of a Fortune 100 company, I do have some familiarity with wireless communications. I decided to survey the area surrounding the proposed tower site. The Cellular Providers 'Comprehensive Plan' notes that they perform a general survey for suitable existing structures within a 5 mile radius before proposing a new tower. By venturing less than 2 miles from the proposed tower site, I encountered several existing structures that would appear to be viable alternatives. The attached map pinpoints 2 water towers, a Sprint PCS tower, and a whole string of electric power towers - all at a greater height than the stated requirement, and all within 2 miles of the proposed new tower. By extending the search to a 5 mile radius, there are literally dozens of apparently viable existing structures.

I next visited the county library where the 'Comprehensive Plan' in its entirety (not just the excerpt I was using) is available for public review. Surely the Cellular Providers must have found those same existing structures that I found, and reasons why these existing structures were found unacceptable would surely be documented in the 'Plan'. There is one page in the 'Plan' that lists existing structures across the Pinelands. This list identifies only one existing structure in towns neighboring this proposed site (an unnamed tower in Berlin, identified by longitude and latitude, that I assume is the Berlin Water Tower). For this structure, nor for all the other structures on that page, is there any indication as to whether the structure would be used or could be used. In summary, there was no useful information on existing structures in the 'Comprehensive Plan'.

My wife and I, along with some neighbors, attended the Pinelands Commission's session held to solicit public comment on the 'Comprehensive Plan'. At that session, we

were made aware that while the Pinelands-wide 'Comprehensive Plan' was not yet approved by the Commission, Bell Atlantic Mobile (BAM) has already submitted an application to the Commission to erect their tower in our community.

Along with the tower application is an Environmental Impact Report, provided by Bell Atlantic Mobile, specific to the Little Mill Acres Tower (Cell Site Designation PHI-EVE2). I was amazed to find that there is still no information provided on existing structures investigated and reasons these alternatives were rejected. Equally amazing to me is the way in which they describe our community and it's surroundings in their report.

The BAM Environmental Impact Report Project Narrative section states that 'adjacent to the site, in the Northern and Eastern direction is a residential type development, in the Western direction is a densely populated deciduous tree region. More specifically, about 100 feet to the north is the Little Mill Acres community, and about 50 feet to the west is the Moore YMCA children's camp.

The Planning Compliance Statement section states that the proposed site is 'located on Chestnut Street in the Southern portion of the Township, north of the Marlton Lakes vicinity and between Hopewell and Kettle Run Road. That describes exactly the location of the Little Mill Acres development, but as elsewhere in this submittal, references to Little Mill Acres are conspicuous by their absence. This despite a big wooden sign with some attractive landscaping at the entrance to our community (provided voluntarily by some neighbors).

The Planning Compliance Statement further states that the proposed facility will meet the needs of Evesham Township, Medford, Waterford, Berlin, Voorhees Township, and Berlin Boro. Several of these areas are not even in the Pinelands - in fact the proposed tower siting is only about ¼ mile inside the Pinelands border. Does this represent 'a demonstrated need to locate the facility in the Pinelands' ?

The Planning Compliance Statement goes on to say the Comprehensive Plan 'further demonstrates the need for this particular communications facility in this vicinity of the Pinelands'. I quote from the Plan: 'This facility is proposed by Bell Atlantic Mobile and is located in Evesham within the "height restricted" area. This facility is required for coverage.' That's it! No other information provided! No other references to this tower! Again, a clearly demonstrated need?

Continuing with the Planning Compliance Statement: '... there is no existing structure with the necessary height or structural capacity to be expanded to the necessary height for multiple users, in the area where this service is proposed in order to provide the required coverage.' As stated before there are at least 8 existing structures within 2 miles - all at a greater height than the stated requirement, and all apparently structurally capable (water towers, electric towers). Since Bell Atlantic is currently the *only* Cellular Provider that requires this tower, it would seem that just putting their service on an existing structure would solve the problem.

Concerning recreation facilities and campgrounds at Marlton Lakes and the YMCA children's camp lakes: 'The dense forest areas between the proposed tower site and these recreation areas, as well as the distance, will eliminate or minimize visual impacts and any direct line of sight of the tower. A visit to Marlton Lakes would make one question that assertion. Many years ago, the Berlin Water Tower was erected to the dismay of Marlton Lakes residents. Despite an abundance of trees *around* the

lake, the trees do little to block the view *across* the lake. This proposed cellular tower would dominate the northern skyline much as the Berlin Water Tower does the southern vista. The problem would be even greater for the YMCA camp lakes given their much closer proximity (less than 1000 feet) to the proposed tower site.

Another dubious claim: 'the nearly continuous and medium dense growth of trees at the edge of the cartway of Chestnut Avenue and the other local roads in the vicinity will minimize line of sight to the tower for travelers of these roads.' Chestnut Street has dense foliage at one end near Hopewell and at the other end near Kettle Run. For the long stretch in between, particularly on the tower side of the road and including the property hosting the proposed site, the tree density is sparse. In addition, the other local roads (specifically Deerfield Rd., Long Ave., Hampshire Ct., and Yorkshire Ct. in Little Mill Acres) will have a clear line of sight to the tower for an estimated 75% of their combined length. Most of the homes will also have a clear line of sight to the tower.

Lastly, and possibly the most outrageous of all the statements, the Planning Compliance Statement describes how the 'combination of setback, proposed landscape buffer and existing forest or tree stands will serve to minimize visual impacts from the surrounding properties.' I leave it to the reader to picture the scene: **my neighbors sitting on their back deck... 100 feet away stands a 200 foot high lattice tower... fortunately, the visual impact is minimized by a ring of 10 foot tall Virginia Pines growing around the base of the tower.**

Just one final thought. If indeed a tower must be built, is the optimal site one that is in a Rural Development zone, within 100 feet of a residential neighborhood on one side and 100 feet of a children's camp on the other? Again, a quick survey of the surrounding area would suggest three obviously better alternatives. To the north of Little Mill Acres is the abandoned Aero Haven airport. This property is large enough that a site could be found that minimizes visual impact to all. An even better location would be the abandoned Marlton dump a little over 2 miles north of the proposed site, which again would result in minimal visual impact.

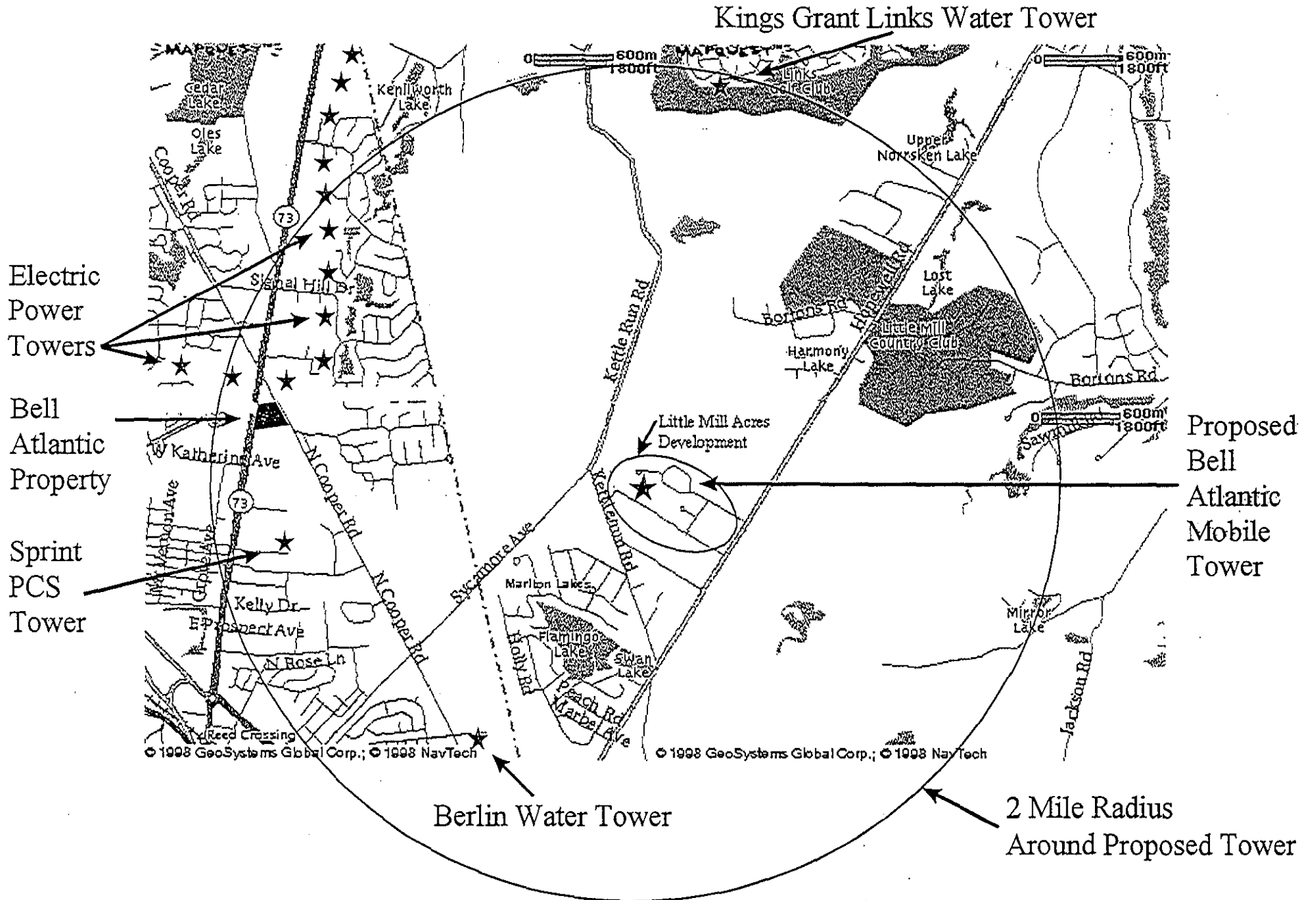
However, the best and most obvious location, should a new tower truly be required, can be found less than 2 miles to the west of the proposed site. This property is outside the Pinelands area. It is located on the border of Berlin and Voorhees (two of the towns to be served by the proposed tower) at the intersection of Rt. 73 and Cooper Road, 2 major thoroughfares. It is located hundreds of feet from the electric power towers mentioned previously, and just up the street from the Sprint PCS tower mentioned previously. This would not be a case of spoiling a currently pristine area. The property is zoned Economic Industrial Business (EIB) and would support the erection of a tower. The friendly people at the Voorhees Municipal Building explained to me that a Dual Use variance would be required, but other than that the erecting of a tower at that site seemed appropriate. The 6 acre property hosts a building for service personnel, and a large parking area for the service vehicles. Visible inspection of the property shows that about 5 of the 6 acres are paved as a parking lot, and at least 2-3 of those acres are vacant. The property is block 303 lot 6 on the Voorhees tax map. The property owner is Bell Atlantic.

Thank you for your attention

A handwritten signature in black ink, appearing to read 'Glenn Orr'. The signature is fluid and cursive, with a large loop at the end.

Glenn Orr
3 Yorkshire Ct.
Little Mill Acres
Marlton, N. J. 08053
610-591-7118 (work)
609-767-3689 (home)

PHI-EVE2 Alternative Existing Sites



BURLINGTON COUNTY ASSOCIATION
OF CHIEFS OF POLICE
500 PEMBERTON-BROWNS MILLS RD.
PEMBERTON, N.J. 08068
609-894-7955

JUL 17 1998

July 16, 1998

State of New Jersey
The Pinelands Commission
15 Springfield Road
P.O. Box 7
New Lisbon, N.J. 08064

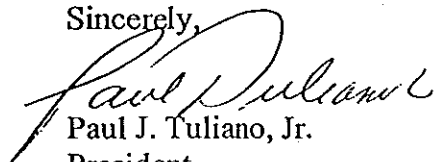
Re: Comprehensive Plan for Wireless Communications
Facilities in the Pinelands

Dear Chairman Sullivan & Members of the Commission:

Burlington County, in conjunction with the municipalities throughout the County, are currently deploying equipment to allow various emergency and public safety entities to utilize a wireless data service (CDPD) provided by Bell Atlantic Mobile.

This service will promote public safety throughout Burlington County, including the Pinelands Management Area. We support the "Comprehensive Plan for Wireless Communications Facilities in the Pinelands" submitted by the cellular carriers which, when implemented, will improve coverage throughout Burlington County and the Pinelands Management Area, thereby allowing these agencies to take full advantage of this technology.

Sincerely,



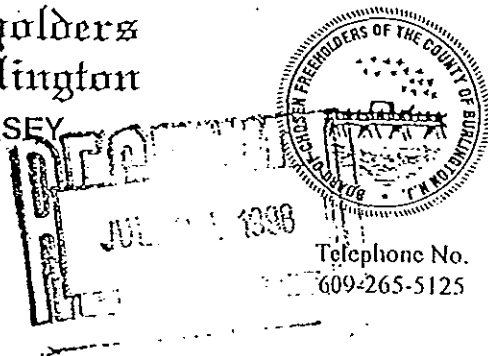
Paul J. Tuliano, Jr.
President
Burlington County Association
of Chiefs of Police

Board of Chosen Freeholders
Of The County of Burlington

MOUNT HOLLY, NEW JERSEY

08060

Clerk of the Board
Office of Data Processing
P.O. Box 6000
49 Rancocas Road, 1st Floor
Mount Holly, NJ 08060



July 17, 1998

State of New Jersey
The Pinelands Commission
15 Springfield Road
P.O. Box 7
New Lisbon, New Jersey 08064

RE: Comprehensive Plan for Wireless Communications Facilities in the Pinelands

Dear Chairman Sullivan and Members of the Commission,

Burlington County, in connection with the municipalities throughout the County, is currently deploying equipment for the use of substantially all police, fire and emergency medical service entities. This equipment requires the use of the cellular digital packet data (CDPD) method of communication provided by Bell Atlantic Mobile.

CDPD will become an essential component for the public's safety throughout Burlington County, including the Pinelands Management Area. As the individual responsible for supervising the general Data Processing function for the County of Burlington I support the "Comprehensive Plan for Wireless Communications Facilities in the Pinelands" submitted by the cellular carriers. I believe that when this plan is implemented, it will greatly improve our police, fire and EMS services ability to provide responsive coverage throughout Burlington County and the Pinelands Management Area.

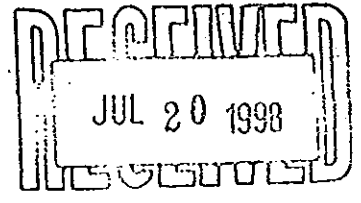
Respectfully yours,

John P. Butler, C.P.A.
Chief Accountant/Data Processing Coordinator



United States Department of the Interior

NATIONAL PARK SERVICE
Chesapeake/Allegheny System Support Office
U. S. Custom House
200 Chestnut Street
Philadelphia, PA 19106



IN REPLY REFER TO:

L32(PHSO/S&P-C)

July 16, 1998

Terrence D. Moore, Executive Director
The Pinelands Commission
P. O. Box 7
New Lisbon, NJ 08064

Dear Mr. Moore:

Thank you for the opportunity to comment on the application submitted by Bell Atlantic Mobile, Comcast Metrophone/Cellular-One, and Nextel Communications, Inc. for Pinelands Commission certification of a Comprehensive Plan for Wireless Communication Facilities in the Pinelands. As you are aware, both the Great Egg Harbor and Maurice Rivers are units of the National Park System under the National Wild and Scenic Rivers System. Two towers were identified for placement within the ¼ mile federal designated boundary of these rivers. The following comments are related to the placement of these new towers, specifically Facilities #14 and #21.

- This Master Plan does not include particulars about specific sites, but rather sets forth a framework, making it extremely difficult to evaluate the potential detrimental visual and environmental effects of new towers in both federally designated river corridors.

We are concerned about the possible affect that Facility #21 may have on the scenic viewshed of the Manumuskin River, described as a "pristine, completely undisturbed natural river system" in the Pinelands Comprehensive Management Plan (page 36, 1980), and designated as "scenic" under the National Wild and Scenic River System criteria.

In addition, Facility #14 lists a proposed facility in the "general vicinity of the Great Egg Harbor River...but not so close in proximity that it is likely to visually intrude upon the river." Once again, not knowing the exact location, nor having the opportunity to view any applications received, makes evaluating the potential impacts of this proposed facility virtually impossible.

- Given the need to protect both the recreational and scenic resources of the Maurice and Great Egg Harbor Rivers, it is difficult to understand how mitigation can be


achieved when the proposed towers will not comply with the "height restricted" areas and may possibly be visible from the river.

- It is our understanding that Pinelands staff tried to ensure that the "least number" criteria is met. Since there is no narrative assessment of how the companies arrived at the final number listed in the Master Plan, it is difficult to conclude that the "least number" is accurate. We recognize the companies' desire to provide seamless coverage in New Jersey; however, once again there is no narrative explanation of where coverage gaps exist or what possible co-located facilities were evaluated and dismissed.

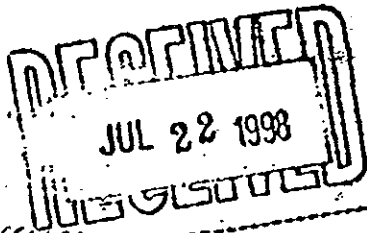
Based on the information contained in the Master Plan, we find it difficult to adequately assess the potential impacts of the proposed towers as they relate to the Maurice and Great Egg Harbor National Scenic and Recreational Rivers. It is our opinion that placement of a tower within the ¼ mile federal boundary contradicts recommendations made in both the Great Egg Harbor River "Final Guidelines for Local River Management Plans" and draft Great Egg Harbor River "Comprehensive Management Plan" and may adversely affect significant resources. In addition, any intrusions in the "pristine" Manumuskin River corridor should be avoided.

We would be pleased to review any additional details that you can provide about these two towers that can alleviate our concerns. Thank you for the opportunity to comment.

Sincerely,


for Mike Gordon, Group Manager
Conservation Assistance

Cc: Steve Kehs, Cumberland County
Julie Akers, Great Egg Harbor Watershed Assoc.



Pinelands Commission
New Lisbon, N.J.
08064

7-20-98
Bob Harbinson
105 Deerfield Ave
Evesham, N.J.
08053

Ref: Comprehensive Plan
appl: 98-0272.01

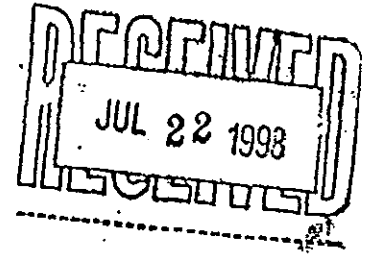
MR. MOORE,

I'm against the proposed tower being built in my neighborhood. I moved here 12 years ago because of the natural beauty of the area and the PROTECTION OFFERED BY the Pinelands Commission against this kind of development.

Sincerely,

Bob Harbinson

Marlton Lakes Civic Association
222 Lakeshore Drive
Evesham Township, NJ 08053
July 24, 1998



re: Cellular Telephone Towers Comprehensive Plan in the Pinelands

Dear Mr. Moore:

The Marlton Lakes Civic Association of Evesham Township wishes to comment on the proposed Cellular Telephone Towers Comprehensive Plan for the Pinelands. The guidance given by the Pinelands Commission to the cellular providers to ensure the "least number" of facilities, and to use existing structures wherever possible is a position we support. However, because site specific proposals are not delineated, approval for the conceptual plan is problematic.

In examining the plan, we have noted a seeming inconsistency with the guidance regarding proposed tower #9, a new structure to be located in southern Evesham Township. It appears the proposal for this new structure violates the guidance that existing structure be used when feasible in the "height restricted region covering the Agricultural Production Area, Rural Development Area, and Select villages (blue shaded area). The Cellular Providers(CP's)s are required to verify that no existing suitable structure exists within the immediate vicinity of the proposed facility.

As noted on the enclosed map, three existing water towers that are existing suitable structure are located within three miles of the proposed yellow triangle site #9 (Group 1 facility).

These existing locations are:

1. Water Tower, Cooper and Taunton Road, Berlin Township
2. Water Tower, Kings Grant Golf Links, Evesham Twp.
3. Water Tower, Kings Grant, Connecting Way, Evesham Twp


In fact, Berlin Township Ordinance 1997-12 specifically identifies two specific sites for the location of commercial antennas or towers, at Block 2401, Lot 1, in the I zone and the Berlin Borough Water Tower at Block 2103, Lot 8.02.

In light of three existing suitable structures, we urge the Pinelands Commission to require that proposed facility 9 be reclassified from Group 1 to Group 2, cellular facilities which may be located on existing structures (green triangles), thus fulfilling the goal of limiting the construction of new facilities to the least number.

This request takes on added urgency in the light of negotiations between Cellular Providers and a property owner in a residential area on Chestnut Avenue in southern Evesham Township. Neighbors within 100 feet of the proposed facility are justifiably concerned for their health and safety. We see no reason for the siting of a tower facility in a residential neighborhood when three water towers within three miles of the Chestnut Avenue site provide reasonable alternative existing sites.

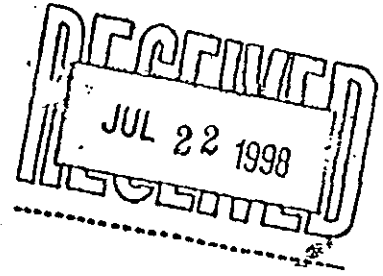
By requiring proposed facility #9 to locate on nearby structures, 1 of 16 proposed new structures can be eliminated. These comments are limited to review of facility #9, and do not constitute an endorsement of the remaining 15 proposed new structures. The Marlton Lakes Civic Association questions the validity of the comprehensive proposal and urges it be reconsidered.

Sincerely,


Jennifer Borys
Secretary

cc: Mayor Gus Tamburro, Evesham Township
Florence Ricci, Evesham Township Manager

Marlton Lakes Civic Association
222 Lakeshore Drive
Evesham Township, NJ 08053



July 24, 1998

Terry Moore, Executive Director
Pinelands Commission
P.O. Box 7
New Lisbon, NJ 08064

re: Cellular Telephone Tower Application 98-0272-01

Dear Mr. Moore:

I am writing on behalf of the Marlton Lakes Civic Association, representing 350 families in the southern portion of Evesham Township. We are neighbors of the proposed cell phone tower mentioned above (Block 66, Lot 1.01 and 1.02), and live within a range of 500 to 2000 feet of the applicant. We are concerned about the danger to the safety and health of the residents and the environment from potentially damaging effects of electromagnetic fields, damage to groundwater (we are all on domestic potable shallow wells), and damage to property values and aesthetic values in the area.

We are further concerned that the proposed cell phone tower is proposed in a residential neighborhood, and borders a YMCA Camp on Kettlerun Road. Residents are living within approximately 100 feet of the proposed structure, and within the "fall zone" of the tower. Up to 100 children a day utilize the YMCA Camp on the adjacent property during the summer months.

Additionally, we don't believe this application is consistent with Evesham's zoning code (160.37) which does not permit tanks, towers, or other structures for water, electricity, radio or telephone in residential zones.

Recently you held a public hearing about the proposed Cellular Telephone Towers Comprehensive Plan for the Pinelands. The guidance given by the Pinelands Commission to the cellular providers (six criteria in N.J.A.C 7:50-5.4(c)4) to ensure the "least number" of facilities, to use existing structures wherever possible, and to locate facilities in non-residential zones is a reasoned approach which the Marlton Lakes Civic Association supports.

The application cited above seems inconsistent with the guidance regarding proposed tower #9, a new structure to be located in southern Evesham Township. It appears the proposal for this new structure violates the guidance that existing structure be used when feasible in the "height restricted region covering the Agricultural Production Area, Rural Development Area, and Select villages (blue shaded area). Southern Evesham is in the Rural Development Area. The Cellular Providers (CP's) are required to verify that no existing suitable structure exists within the immediate vicinity of the proposed facility.

As noted on the enclosed map, three existing water towers that are existing suitable structure are located within three miles of the proposed yellow triangle site #9 (Group 1 facility), currently under Pinelands Commission review as Application 98-0272-01.

These existing locations are:

1. Water Tower, Cooper and Taunton Road, Berlin Township
2. Water Tower, Kings Grant Golf Links, Evesham Twp.
3. Water Tower, Kings Grant, Connecting Way, Evesham Twp

In fact, Berlin Township Ordinance 1997-12 specifically identifies two specific sites for the location of commercial antennas or towers, at Block 2401, Lot 1, in the I zone and the Berlin Borough Water Tower at Block 2103, Lot 8.02.

In light of three existing suitable structures, the Pinelands Commission should amend the plan to require that proposed facility 9 be reclassified from Group 1 to Group 2, cellular facilities which may be located on existing structures (green triangles), thus fulfilling the goal of limiting the construction of new facilities to the least number, and avoiding residential areas. Such a reclassification would render the current application moot, because it would not meet the above two criteria.

The need has not been demonstrated for the siting of a tower facility in a residential neighborhood when three water towers within three miles of the Chestnut Avenue site provide reasonable alternative existing sites. Therefore the Marlton Lakes Civic Association requests that the Application 98-0272-01 be denied.

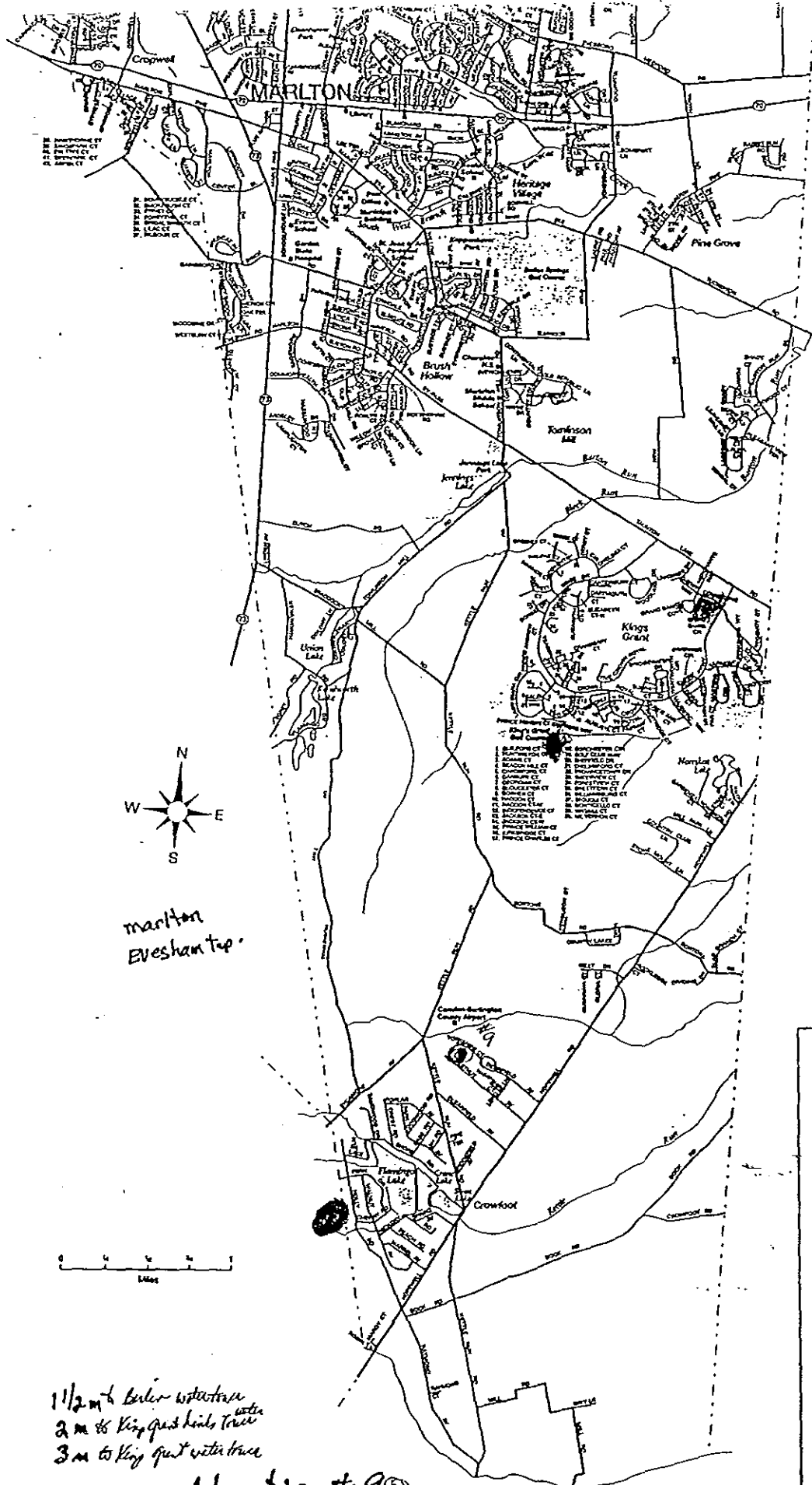
Sincerely,



Jennifer Borys,
Secretary
Marlton Lakes Civic Association

cc: Mayor Gus Tamburro, Evesham Township
Florence Ricci, Evesham Township Manager

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4
3
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marlton
Evesham top

1 1/2 m to Kier water tower
2 m to King quit heirs tree
3 m to King quit water trace

proposed Location # 90
existing water tower structures

Board of Chosen Freeholders
Of The County of Burlington

P.O. BOX 6000

MOUNT HOLLY, NEW JERSEY

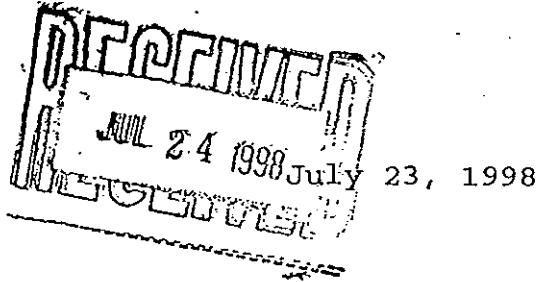
08060



OFFICE OF THE
BURLINGTON COUNTY FREEHOLDERS

Theresa D. Brown
Vincent R. Farias
Philip E. Haines
William S. Haines, Jr.
James K. Wujcik

Frederick F. Galdo
County Administrator/
Board Clerk
609-265-5020
Fax: 609-702-7000



Terrence D. Moore
Executive Director
Pinelands Commission
P.O. Box 7
New Lisbon, NJ 08064

Re: Comprehensive Plan for Wireless Communications
Facilities in the Pinelands

Dear Mr. Moore:

Reference is made to the public hearing convened on the above-captioned subject July 9, 1998 in Hamilton Township, Atlantic County.

The revised cellular plan has been reviewed by Burlington County staff, including our 9-1-1 Emergency Coordinator. The Commission is to be commended for its efforts to encourage co-location of equipment on existing structures and proposed new towers. From a public safety perspective, Burlington County believes that the proposed cellular plan will have a positive impact upon the ability of citizens to contact our 9-1-1 emergency system in times of need.

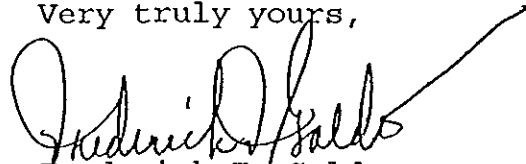
We are also in the process of planning upgrades and/or a replacement of our county-wide public safety radio communications system. This system is responsible for providing dispatch services to all of the fire departments and emergency squads in Burlington County, as well as, a majority of the police departments. Tower 16 in the proposed plan is a new site currently anticipated to be situated adjacent to the Sweetwater Fire Station. Construction of this tower by Bell Atlantic is strongly encouraged, since the site will play an integral role in Burlington County's new radio system.

The County does need to establish other tower locations within the Pinelands area if we are to provide the level of emergency communications that is required. We are evaluating other sites identified in the plan, to determine 1) if they can meet the county's needs insofar as the coverage area is concerned; and 2) if it is possible to co-locate county radio antennae on facilities owned and/or constructed by other users.

Page 2
July 23, 1998
Comprehensive Plan for
Wireless Communication

Again, and on behalf of the freeholders, I must underscore that our concern is public safety. Eliminating the communication gaps in both the existing cellular coverage and in the county-wide public safety communications network is paramount if we are to provide our residents with the ability to be located and assisted in times of emergency.

Very truly yours,



Frederick F. Galdo
County Administrator/Board Clerk

FFG/gw

cc: Board of Chosen Freeholders
Evan H. C. Crook, County Solicitor
William Connors, Director/Public Safety
Jeff Matheson, 9-1-1 Coordinator
Harold L. DeLaRoi, Management Specialist

WILLIAM P. CLOYES

JUL 27 1998

31 WEST 87TH ST.

BRIGHTON BEACH, NJ

0800 863361

JULY 23, 1998

HONORABLE CHAIRMAN

PINELANDS COMMISSION

DEAR SIR:

I STRONGLY URGE YOU AND
THE MEMBERS OF THE COMMISSION
TO OPPOSE NEW CONSTRUCTION,
PARTICULARLY CELL-PHONE TOWERS
THAT THE COMMUNICATIONS
INDUSTRY WANTS TO ERECT IN
THE "PYGMY PINE" FOREST OF NEW
JERSEY. WE DROVE THROUGH THE
FOREST YESTERDAY ON ROUTE 72,
WITNESSED ITS BEAUTY AND
DECLARED THAT IT WOULD BE
CRIMINAL TO FILL THIS
BEAUTIFUL FOREST WITH "SIGHT
POLLUTION" FROM CELL-PHONE
TOWERS.

MY TELEPHONE AND TV
LINES TO MY HOME ARE UNDER-
GROUND, AND I WISH IT WERE

OVER-

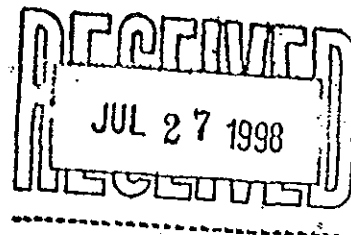
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A LAW THAT ALL ELECTRIC
LINES WERE PLACED ^{8 FT} UNDER -
GROUND. TELEPHONE POLES
AND POWER LINES ARE A
TERRIBLE SOURCE OF SIGHT
POLLUTION IN OUR COMMUNITIES.
PLEASE DO NOT LET THE
PINELANDS BECOME POLLUTED
WITH UNSIGHTLY CELL-PHONE
TOWERS. LET BELL ATLANTIC'S
NEW YORK ENGINEERING DEPT.
TO COME UP WITH OTHER
OPTIONS.

Sincerely,

William P. Cloyer

Borough of Woodbine

Municipal Building
809 Franklin Street
Woodbine, New Jersey 08270
(609) 861-2266
FAX: 861-2529



William Pikolycky
Mayor

Michael E. Benson
Solicitor

Frances P. Pettit
Clerk/Collector

July 24, 1998

Please reply to:
Michael E. Benson, Esquire
BUONADONNA, BENSON & PARENTI
1138 East Chestnut Avenue
Vineland, New Jersey 08360

The Pinelands Commission
P.O. Box 7
New Lisbon, NJ 08064

ATTENTION: TERRENCE MOORE, EXECUTIVE DIRECTOR

RE: COMPREHENSIVE PLAN FOR WIRELESS COMMUNICATIONS FACILITIES IN
THE PINELANDS

Dear Mr. Moore:

In connection with the Borough of Woodbine's position in the above matter, I am enclosing a copy of correspondence of July 17 from counsel for Cellco/Bell Atlantic addressed to Judge Callinan in the context of pending litigation with the Borough of Woodbine. Of interest to the Borough is the quotation in the correspondence that if Bell Atlantic is unable to locate a site in the Regional Growth/Town Center area, it would revert to the site referenced in their first Comprehensive Plan (i.e. Hamilton Avenue), which is located in the Restricted Rural Development area.

The Borough would take exception to any reversion to the disputed Hamilton Avenue site and would urge that the Comprehensive Plan, if approved, preclude the Rural Development area and, as noted in my previous correspondence of July 15, 1998, require that the cellular antenna be placed on an existing structure in the Borough of Woodbine.

Thank you for your kind attention.

Very truly yours,

MICHAEL E. BENSON

MEB:sjd
Enclosures

cc: Mayor William Pikolycky
Chairman Steve Zenyuk, Woodbine Planning/Zoning Board
Warren O. Stilwell, Esquire

G:\SHARON\CELLCO\MOORE2.LTR

LAW OFFICES
WARREN O. STILWELL
9615 VENTNOR AVENUE - THIRD FLOOR
P.O. BOX 3426
MARGATE, NEW JERSEY 08402
(609) 822-1118
FAX (609) 822-1105

WARREN O. STILWELL
MICHAEL C. LEARN

July 17, 1998

RECEIVED JUL 22 1998

Honorable John F. Callinan, J.S.C.
Court House
9 North Main Street
Cape May Court House, New Jersey 08210

Re: Cellco vs. Borough of Woodbine
Docket No. L-537-97 P.W.

Dear Judge Callinan:

I am writing this letter per my conversation with Rosemarie Smith regarding a status update of the pending Pinelands Comprehensive Plan (the "Plan") and its effect upon the appeal.

First, the most recently submitted Plan shows the "approximate location" of the site being moved from an area classified rural development to a less sensitive, regional growth or town center area. Second, even though the regulation requires "approximate" locations, the Plan provides that when an approximate location encompasses more than one classification area, that the less sensitive area would be used first, and more sensitive areas used only if a site could not be found in a less sensitive area. Third, what this means is that the site under consideration in the appeal will only be viable if we cannot locate a site in the regional growth/town center area. Fourth, the Plan has not yet been approved by the Pinelands Commission. A public hearing was held on July 9, 1998. According to N.J.A.C. 7:50-5.4(c), the Executive Director of the Pinelands Commission has 30 days to issue a report recommending approval, approval with conditions or a denial. The Pinelands Commission then has 30 days within which the recommendation should be approved or modified. We have reason to believe that the Pinelands Commission will consider the matter at its September meeting.

Because it is possible that we will not be able to find a site in the Regional Growth area of Woodbine and because the Plan has not yet been approved, we are respectfully requesting that the matter continue to be listed as inactive.

WARREN O. STILWELL

Page -2-
July 17, 1998

Under the circumstances, I think the next status update should be provided in September. If you have any questions, please call.

Respectfully,

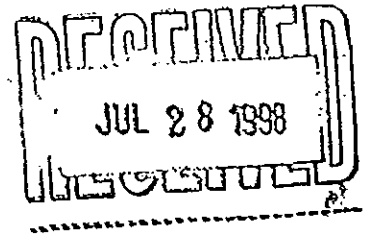
A handwritten signature in cursive script that reads "Warren O. Stilwell".

WARREN O. STILWELL

WOS/mls

cc: Claire Schultz
Michael E. Benson, Esq.

Anthony & Susan Melsi
101 Long Lane
Little Mill Acres
Marlton, NJ 08053



26 July 1998
Mr. John Stokes
Pinelands Commission
P.O. Box 7
New Lisbon, NJ 08064

Regarding: Application 98-0272.01 Cell Tower at Little Mill Acres

Dear Mr. Stokes:

In October of 1984 we moved to a rural residential area in southern Evesham Twp., and have enjoyed the beauty of the Pinelands since that time. It recently came to our attention that Bell Atlantic plans to erect a 200 ft. tower several lots away from our home in Little Mill Acres.

My understanding is that Bell Atlantic applied for this approval even before the Pinelands Commission finalized its comprehensive plan. Regulation 7, under the Pinelands rules, requires that all providers use existing structures wherever possible. There are several suitable alternatives within our geographic area that Bell Atlantic fails to mention. These need to be explored to a greater degree. There are water towers, a SprintPCS tower, a string of electric towers, and other structures within two miles of the proposed new tower. Why must a structure tower above a 40 foot treeline, destroying the unobstructed view.

A tower near a closed airport facility, which many private pilots still use as a flyby sight, may create some safety issues right in the middle of a residential area.

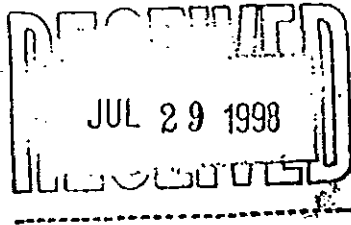
I understand that Regulation 8, under the comprehensive plan, states that the tower needs to be sited to avoid visual impacts on the scenic and residential areas. This tower not only affects surrounding residents, but also YMCA Camp Moore, and the people that enjoy that facility. It is interesting to note that Bell Atlantic recently made a presentation of cellular phones to the camp (see pg. 4 of The Central Record, July 23 1998).

There are better alternatives for the placement of this facility. There is also the possibility of using space on existing structures. One of the many available sites to consider is Bell Atlantic's existing facility at Cooper Rd. And Rte. 73.

An obstructed view not only destroys the purpose of the Pineland Commission's charge to protect these areas, but also hurts existing property values and marketability. We appreciate your sensitivity to these concerns. We hope you will vote against the placement of this tower next to Little Mill Acres. Let's preserve the beauty of the Pinelands and Evesham Twp.

Sincerely,

Anthony and Susan Melsi
cc: Gus Tamburro, Mayor of Evesham Twp.



July 24, 1998

The Pinelands Commission
P.O. Box 7
New Lisbon, New Jersey 08064

Attention: Terrance Moore, Executive Director

Re: Comprehensive Plan for Wireless Communications in the Pinelands

Dear Mr. Moore:

I am a resident of Evesham Township, NJ located at 5 Yorkshire Court in Little Mill Acres Development. The site for proposed cellular tower #9 (application #98-0272.01) is located approximately 100 feet from my home. The close proximity of a 200 foot tower to my family's home, especially the bedroom areas, is quite alarming. I would, therefore, like to voice my concern and state reasons why I feel this site does not comply with the guidelines set forth in the regulations governing the Comprehensive Plan for Wireless Communications in the Pinelands.

According to the criteria for Rural Development areas in Regulation #8, new towers are to be located in non-residential zones. The site for proposed cell tower #9 and the surrounding areas are zoned Rural Development #2. Application #98-0272.01 describes the northern and eastern areas adjacent to the site as "residential type development" under Existing Site Conditions. Also, section 4 part 2 refers to "numerous residential lots" are located in this area.

According to Regulation #7, utilization of existing structures must be demonstrated. Application #98-0272.01 section 3 states that "there is no existing structure with the necessary height or structural capacity to be expanded to the necessary height for multiple users." I find this statement difficult to comprehend. Numerous existing structures are located within 2 or 3 miles of this proposed site. These include three water towers, two of which are located in the Kings Grant section of Marlton and one in Berlin, a Sprint PCS tower located in Voorhees, Kettle Run Fire Station located on the corner

of Chestnut and Hopewell Roads as well as numerous electrical towers owned by Atlantic Electric. Bell Atlantic Mobile reportedly attempted to lease the existing tower at the Kettle Run Fire Station but it was "too expensive." I would like to review their cost analysis of leasing an existing structure versus building a new structure. Regardless of cost, this demonstrates that alternative existing structures are available for placement of a cell antenna.

However, if Bell Atlantic Mobile is focused on constructing a new structure in order to recoup costs through leasing to other companies, they did not have to look farther than their own back yard. Bell Atlantic Mobile owns a 6 acre parcel of land zoned business/industrial located approximately 2 miles from proposed cell tower #9 on Cooper Road near Route 73 in Voorhees Township bordering Berlin and southern Evesham Township. This site would service Evesham Township, Medford, Waterford, Berlin, Voorhees Township and Berlin Boro as stated in section 1 of Application #98-0272.01.

Section 4 part 1 and 2 of the application have eluded to the fact that a dense forest exists south and west of the site which "would completely obscure any view of the tower from ...Kettle Run Road." The trees which comprise this "dense forest" are deciduous trees, 50 to 60 feet in height, which lose their leaves from the end of October until the middle of May. As my property runs parallel to the "dense forest" situated west of the proposed tower, I can attest to the fact that during late fall, winter and early spring there is no "dense canopy" to obscure the view of the tower from travelers along Kettle Run Road.

Section 4 part v of application #98-0272.01 states the proposed site is "set back 300 feet from Chestnut Avenue" thereby placing the structure approximately 100 feet from my property which is located in a residential development. The proposed 20 feet wide landscape buffer and 7 foot high chain link fence will not minimize the visual impact of a 200 foot tower adjacent to a ranch style home. The tower will be approximately 140 feet from my sons' bedrooms, who are 9, 11, and 12 years old. There is significant controversy concerning potential health risks from living under towers. Why place our children, as well as ourselves, in potential jeopardy if there are safer alternatives?

Section 4 part ii states that the two "Y" camps west of the site are "located between 750 to 1000 feet away." Camp Moore is located in the dense forest to the west of the proposed tower. My property runs approximately 500 feet side by side with Camp Moore toward Kettle Run Road. The children from Camp Moore play games and roam the woods located 35 feet from the proposed site and have been seen wandering on the open field designated for the proposed tower. The swimming area for the YMCA camp is located approximately 750 and 1000 feet away from the proposed site.

Section 4 part vi denotes that Evesham's zoning ordinance for Rural Development #2 allows public service infrastructure as a conditional use. However, Zoning Code #160-37 in the Master Plan for Evesham Township states **"tanks, towers or other structures to provide for water, electricity, radio, telephone or similiar provisions shall not be permitted in residential zones."** (See Attached Zoning Code)

Application #98-0272.01 also lacks information needed to address the foundation for the tower, fall zone area and possible use of large air conditioning units required to cool equipment. The foundation for the tower is of concern as residents in the surrounding area including Little Mill Acres Development obtain their water via wells ranging from 60 to 360 feet deep. Our well is only 66 feet in depth.

Our home and Camp Moore are clearly within the fall zone of the proposed 200 foot tower. Despite all safety precautions when constructing a tower, natural disasters do occur which can cause towers to fall as demonstrated in Maine after a severe ice storm.

Our family resides in a quite, serene neighborhood far away from busy highways, airports and industry. If large air conditioning units are used on this site, significant noise pollution will greatly impact upon this peaceful country-like setting. My husband and I relocated from nothern New Jersey to raise our family in this country-like environment. I grew up in the flight path of Newark Airport and did not relocate to raise a family under a tower. I am in disbelief that I am fighting against the construction of a 200 foot tower proposed 100 feet from my property while residing in the protected area of the Pinelands.

In summary, Application #98-0272.01 does not meet the regulations governing the Comprehensive Plan for Wireless Communications in the Pinelands as the proposed site is located in a residential area and numerous alternative existing structures for cell antenna placement have been demonstrated. The visual impact as well as possible noise pollution and health concerns on the residential area surrounding this proposed 200 foot tower will be tremendous. As previously stated, the most suitable site which is zoned for a tower of this magnitude is located just 2 miles from proposed site #9, outside of the protected area of the Pinelands, in Bell Atlantic Mobile's own back yard.

Respectfully submitted,
Lynda A. Medvec

July 24, 1998

The Pinelands Commission
P.O. Box 7
New Lisbon, New Jersey 08064

Attention: Terrance Moore, Executive Director

Re: Cellular Telephone Tower Application #98-0272.01

Dear Mr. Moore:

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Respectfully submitted,
Lynda A. Medvec

- a. Front yard: fifty (50) feet.
- b. Rear yard: fifty (50) feet.
- c. Side yard: fifteen (15) feet, thirty-five (35) feet aggregate.
- d. Frontage: one hundred (100) feet.
- e. Impervious coverage limit: fifteen percent (15%) of the parcel.

↙
§ 160-37. Tanks and towers.

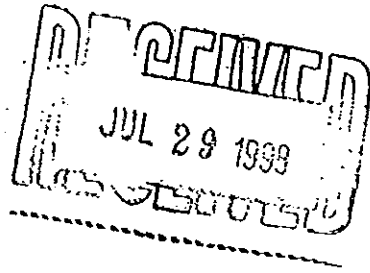
Tanks, towers or other structures to provide for water, electricity, radio, telephone or similar provisions shall not be permitted in residential zones.

§ 160-38. Transfers of density.

A. Forest Area. Residential dwelling units on 1.0 acre lots existing as of January 14, 1981 shall be permitted in the FA and FW Zones, provided that:

1. The owner of the lot proposed for development acquires sufficient vacant contiguous or non-contiguous land which, when combined with the acreage of the lot proposed for development, equals at least 20 acres if development is proposed in the FA Zone and at least 12 acres if development is proposed in the FW Zone.
2. All lands acquired pursuant to subsection 1 above, which may or may not be developable, are located within the same zoning district where development is proposed;
3. All non-contiguous lands acquired pursuant to subsections 1 and 2 above are permanently dedicated as open space through recordation of a deed to the property with no further development permitted except agricultural, forestry and low intensity recreational uses. Any such deed restriction shall be in a

July 27, 1998



Pinelands Commission
P. O. Box 7
New Lisbon, NJ 08064

Dear Mr. Moore,

This letter is in reference to the Bell Atlantic Application #98-0272.01 submitted to the Pinelands Commission for the construction of a 200 foot lattice cell tower, 345 square foot modular building and other site additions.

I am writing to protest the potential construction of this Bell Atlantic 200 foot lattice cell tower, 345 square foot modular building and other related site additions on Block 66, Lots 1.01 and 1.02 in Evesham Township, Burlington County. This property is a private residence on Chestnut Avenue, totally surrounded by private residences in Little Mill Acres and along Chestnut Avenue and situated next to a YMCA Children's summer camp and family swim club. There has been no formal notification of the application to build this tower complex and our community has discovered the plan by accident.

I understand the Pinelands Commission is now reviewing the various Cellular Providers' (Bell Atlantic, Comcast, Nextel) Comprehensive Plan for compliance with Pinelands Commission regulations. These regulations were established to minimize impacts to the Pinelands area. Regulation 7 requires that the cellular providers use existing structures wherever possible. Regulation 8 requires that when a new tower must be built because there are no viable alternatives, that tower be to be sited to avoid visual impacts to scenic areas and residential areas.

The plan drafted by the Cellular Providers notes that they perform a general survey for suitable existing structures within a five-mile radius before proposing a new tower. Less than two miles from the proposed Little Mill Acres tower, there are several existing structures that would appear to be viable alternatives. There are two water towers, a Sprint PCS tower and numerous electrical power towers – all at a greater height than the stated requirement, and all within two miles of the proposed new tower. Within a 3 to 5 mile radius of the proposed tower, there are dozens of existing structures and/or available industrial/commercial land that would be much more suitable than the residential community of the proposed site.

The Pinelands Commission held a session on July 9, 1998 to solicit public comment on the Comprehensive Plan. The Cellular providers presented their plans, but provided no information on existing structures. In fact, the only information on existing structures was presented by Atlantic Electric, trying to convince the Providers to use their electric towers instead of the current plan to erect new towers. At this same session, it was learned that, while the Comprehensive Plan was not yet approved by the Commission, Bell Atlantic had already submitted an application to erect the Little Mill Acres Tower.

Along with the tower application, Bell Atlantic provided an Environmental Impact Report specific to the Little Mill Acres Tower. My neighbors and I were amazed to discover that there is still no information provided on existing structures investigated and reasons these

alternatives were rejected. The proposed location is in the middle of residential homes and is 100 feet south of Little Mill Acres home development and about 50 feet east of the YMCA children's Camp Moore.

This Environmental Impact Report states that "adjacent to the site, in the northern and eastern direction is a residential type development, in the western direction is a densely populated deciduous tree region." More specifically, homes are situated on either side and directly across the street of the proposed tower and also about 100 feet behind (to the north) is the Little Mill Acres community, and about 50 feet west is the YMCA camp.

The report states that the proposed facility will meet the needs of Evesham, Medford, Waterford, Berlin, Voorhees Townships and Berlin Boro. Several of these areas are not even in the Pinelands; in fact, the proposed tower siting is only about a mile inside the Pinelands border. This does not represent "a demonstrated need to locate the facility in the Pinelands."

Concerning recreation facilities and campgrounds at Marlton Lakes and YMCA Camp Moore lakes, the report states "The dense forest areas between the proposed tower site and these recreation areas, as well as the distance, will eliminate or minimize visual impacts and any direct line of sight of the tower." A visit to Marlton Lakes would make one question that assertion. Many years ago, the Berlin Water Tower was erected to the dismay of Marlton Lakes residents. Despite an abundance of trees around the lake, the trees do little to block the view across the lake. The proposed tower is much closer to existing homes and would dominate the skyline from all directions.

I question the ^{legality} necessity, feasibility, aesthetics and safety of placing a 200-foot lattice tower plus an accompanying utility building complex in a Rural Development Zone in the middle of a stable residential community and right next to a Children's camp. A survey of the surrounding area would suggest a better alternative. The most obvious location can be found less than two miles from the proposed site. This property is outside the Pinelands area. It is located on the border of Berlin and Voorhees (two of the towns to be served by the proposed tower) at the intersection of Rt. 73 and Cooper Rd, two major thoroughfares. It is located near some of the other towers mentioned above, so this would not spoil a currently pristine area. The property is zoned Economic Industrial Business. Visible inspection of this property shows that about five of the six acres are paved as a parking lot, and at least two to three of those acres are vacant. The property owner is Bell Atlantic.

Cc

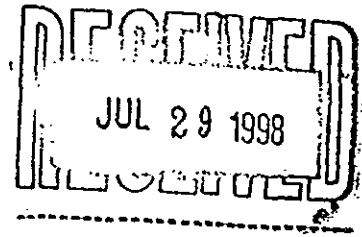
Sincerely,



Patricia J. Carr
1 Yorkshire Ct
Evesham, NJ 08053-7104

July 27, 1998

Pinelands Commission
P. O. Box 7
New Lisbon, NJ 08064



Dear Mr. Moore,

This letter is in reference to the Comprehensive Plan for Wireless Communications Facilities in the Pinelands.

I am writing to protest the potential construction of a Bell Atlantic 200 foot lattice cell tower, 345 square foot modular building and other related site additions on Block 66, Lots 1.01 and 1.02 in Evesham Township, Burlington County. This property is a private residence on Chestnut Avenue, totally surrounded by private residences in Little Mill Acres and along Chestnut Avenue and situated next to a YMCA Children's summer camp and family swim club. There has been no formal notification of the application to build this tower complex and our community has discovered the plan by accident.

I understand the Pinelands Commission is now reviewing the various Cellular Providers' (Bell Atlantic, Comcast, Nextel) Comprehensive Plan for compliance with Pinelands Commission regulations. These regulations were established to minimize impacts to the Pinelands area. Regulation 7 requires that the cellular providers use existing structures wherever possible. Regulation 8 requires that when a new tower must be built because there are no viable alternatives, that tower be sited to avoid visual impacts to scenic areas and residential areas.

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100 feet south of Little Mill Acres home development and about 50 feet east of the YMCA children's Camp Moore.

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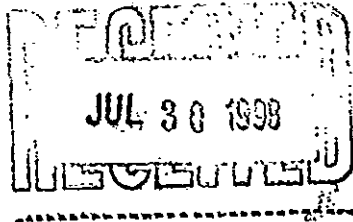
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Cc

Sincerely,



Patricia J. Carr
1 Yorkshire Ct
Evesham, NJ 08053-7104



279 Chestnut Avenue
Evesham Township, NJ 08053
July 29, 1998

Mr. Moore, Director
Pinelands Commission
P.O. Box 7
New Lisbon, NJ 08064

re: Comprehensive Plan for Wireless Communication

Dear Mr. Moore:

In 1989 we purchased the property on which we built our family home in Evesham Township. We had a clear understanding of zoning restrictions and the character of this residential neighborhood. This property is located twenty-two feet from the land parcel where a proposed cell tower (facility #9) might now be erected. We strenuously object to this major change to the complexion of our immediate surroundings.

While perusing the application for facility #9, we found that it is loaded with misrepresentations. We will attempt to clarify some of these overt distortions.

- There are various existing structures in the local area which might accommodate the necessary equipment.
- There are large stretches of land without residential development in the local area.
- Camp Moore (YMCA Children's Camp) is located within 100 feet not 750 feet as stated in the application.
- The forest canopy will do nothing to obscure the tower, which will be visible for multiple miles. The proposed site is an open field and there is minimal tree growth along the parcel of land on Chestnut Avenue.
- The visual intrusion will be significant in this residential neighborhood.

Locating this tower in a residential neighborhood will place a substantial hardship on area property owners as well as a visual intrusion to thousands of people in the local area. There are existing sites with the proper zoning for such structures.

While the company makes appeals for public health and safety, one cannot escape the profit motive. No one wants Bell Atlantic Mobile profit to dictate the quality of lives in this local area.

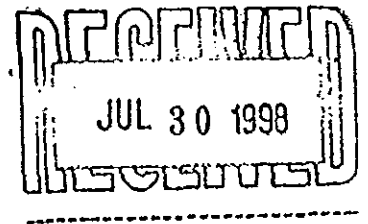
Sincerely,



Robert E. Mitchell
Rita Riebel Mitchell

COALITION AGAINST TOXICS

223 Park Avenue
Atco, New Jersey 08004
(609) 767-1110



WYNNE FALKOWSKI
CHAIRPERSON
DAVID C. COPELAND
VICE-CHAIRMAN
JANE NOGAKI
SECRETARY-TREASURER

July 29, 1998

Terry Moore, Executive Director
Pinelands Commission
P.O. Box 7
New Lisbon, NJ 08064

Re: Pinelands Comprehensive Plan for Wireless Communication Facilities within the Pinelands

Dear Mr. Moore:


The following comments relative to the above-referenced plan represent Coalition Against Toxics' opposition to siting a cellular tower in a residential area of Evesham Township (9BP) and our opposition to siting a cellular tower (5BP-CP) in the "Pygmy Pine" area of the Pinelands.

The proposed Pinelands Comprehensive Plan for Wireless Communications Facilities Within the Pinelands indicates that towers should be located wherever possible on existing structures and away from residential, recreational and environmentally sensitive areas. Towers 9 and 5 violate the criteria, and should be eliminated from the plan.

Other proposed towers may also violate the standards; our comments are limited to just these two proposed structures which we have had the opportunity to personally review. However, we are opposed to any new towers which don't strictly meet to the standards set forth in the plan.

We recognize the need for adequate telephone communications, but feel the applicant should adhere to the Pineland's Comprehensive Plan and place their equipment on existing structures or construct new towers in commercially zoned areas away from homes, recreational facilities, and environmentally sensitive areas.

Sincerely,


Wynne Falkowski, Chairperson
Coalition Against Toxics

Richard C Powell
1264 Tanager Rd
Sewell NJ 08080
609-468-5257
July 30, 1998

To whom it may concern,

In reference to comments on tower in the pinelands. I find it very sad, that we would consider something so ugly in such beautiful area. I think of the people who own this property to give it up for pennys. Also the owners of pineland property, who are very restricted in what they have to do to build a home in the pinelands.

My husband and I own 55 acres in the pinelands and are hoping to build a home in the near future. We were very distress to find that a tower was going to be build next to our property on Indave in Mullica Township. When it comes to towers we get very nervous. Because we have a 150 ft. metropower tower 15 feet

from our property line on
Tanyard Rd. in Sewell N.J.

There are some reasons.

1. The owners of the towers don't care about the people who live next to them or how it depreciates the property around them.
2. The birds sit on them and dropping from ~~them~~ ^{the birds} fall on your cars and property.
3. Large icicles fall from the tower in winter creating a hazard. (no one listens).
4. The modular unit used to service ^{the tower}, they come to 2 to 3 in morning and are very noisy.

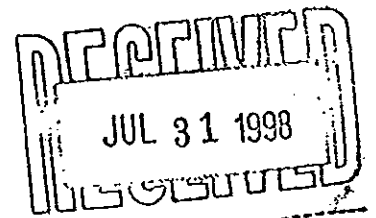
We put our home up for sale, to get away from metrophone towers, only to find one is ~~proposed~~ ^{proposed} for our street in the Jewlands. I believe that these towers should be in the back yards of the people who profit from them.

Sincerely
Richard & Lucille Danz



Pinelands
Preservation Alliance

114 Hanover Street Pemberton, New Jersey 08068 Phone 609.894.8000 Facsimile 609.894.9455



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Nan Hunter Walnut
Coordinator,
Pine Barrens Coalition

Betty Wilson
Former Deputy Commissioner,
NJ Dept. of Env. Protection

Carleton K. Montgomery
Executive Director

July 30, 1998

Terrence Moore
Executive Director
The Pinelands Commission
P.O. Box 7
New Lisbon, NJ 08064

Re: Proposed Cellular Telephone Tower Plan for the Pinelands

Dear Mr. Moore:

This letter is to provide the Pinelands Commission with the views of the Pinelands Preservation Alliance ("PPA") regarding the proposed plan (the "Plan") submitted by three cellular telephone service providers (the "Providers") for consideration by the Pinelands Commission under the Comprehensive Management Plan. As explained below, PPA submits that the Plan should not be approved in its current form, but that the Commission should require the Providers to provide additional information, and to alter certain proposed locations for new towers, before giving the Plan final consideration.

PPA is an alliance of conservation-minded citizens and environmental organizations that is devoted to preserving the natural and cultural resources of the New Jersey Pinelands. The scenic and aesthetic values of the Pinelands are among its most precious resources. PPA is deeply concerned that the Provider's proposed Plan may cause unjustified and unnecessary damage to the Pinelands, and that the Plan as currently proposed is likely to fail in achieving its own stated purposes and the objectives of the Comprehensive Management Plan (the "CMP").

Because the Providers seek to build new facilities in areas other than Regional Growth Areas and Pinelands Towns, the CMP requires that the Providers to submit "a comprehensive plan for the entire Pinelands Area" which

- "demonstrate[s]" compliance with several specific requirements, including that
- (a) facilities in the Preservation, Forest and other specified areas are "the least number necessary to provide adequate service,"
 - (b) "[t]here is a demonstrated need for the facility ... as well as a demonstrated need to locate the facility in the Pinelands ...,"
 - (c) each antenna "utilizes an existing communications or other suitable structure, to the extent practicable."

The current Plan fails to satisfy these requirements because, while the Plan makes numerous *representations* with respect to these requirements, it does not

demonstrate compliance with these provisions.

The building of numerous new, very tall cellular telephone towers presents exactly the kind of piecemeal, incremental degradation that most threatens the Pinelands today. In many instances, the Providers can be expected to argue that it is appropriate to build a new tower in a given place because there are already homes, buildings or other structures in the area. In many instances, the Providers will propose to build a tower in places that today are still relatively pristine. In either case, the presence of cellular telephone towers is sure to draw others who will assert that now the damage is done, let there be a little more. This argument knows no bounds.

The Commission and its staff have accomplished a great deal in bringing the Providers to put forward the current Plan -- a significant improvement over the Providers' original plans. Nevertheless, we believe the Plan is still deficient under the CMP and must be further improved before it is ready for the Commission's approval.

These comments are organized to provide separate substantive explanations of the deficiencies we believe exist in the current Plan, and the reasons in each case that these deficiencies cause the Plan, in its current form, to fail under the legal requirements of the CMP.

1. Towers In Preservation and Forest Areas

PPA is very concerned that the proposed Plan includes three new towers [2, 5, 7], plus one possible new tower [6], in the Preservation Area, and one possible new tower [22] in the Forest Area. PPA is opposed to having any new towers built in these areas if it is humanly possible. Because the proposed Plan provides such a vague description of the proposed towers, we cannot evaluate whether all or any of these towers are genuinely necessary to provide adequate service, based on the current Plan document. For this reason, PPA submits that the Plan should not be approved. At an absolute minimum, the Commission must scrutinize these facilities very, very carefully -- because these facilities compromise the integrity of the places we value most highly for preservation.

Moreover, one of these facilities, No. 5, is a new tower which the Providers propose to build within a dwarf or pygmy pine forest along Route 72. PPA believes this tower should not be built. Clearly, the visual impact of such a tower is vastly exaggerated if placed in the pygmy pine forest, and it is difficult to guess how the industry would mitigate that impact in any sufficient manner. Because it appears to us that it will be impossible to meet the siting requirements for this tower, this tower should be relocated outside the pygmy pine forest.

While the exact location of this tower is not stated in the Plan, the location of the symbol on the Providers' map and the comments of the Bell Atlantic Mobile representative in the attached news story appear to demonstrate that the Providers seek the right to build the tower

within the heart of the West Plains near the county line along Route 72. In addition, we are highly skeptical that this site is necessary for any reason. We recently tested cellular service along Route 72, during mid-day on a weekday, and found that existing service was just fine, except for a very short stretch beginning at the junction with Route 539, where the road dips into a depression. This location is about 4 miles east of the county line at which the Providers' map places tower No. 5.

The pygmy pine forests are so extraordinary -- and their scenic value is so easily damaged -- that the Commission simply should not permit this tower, and should not approve the current Plan so long as it includes this location for a new tower. There is no *genuine* public need for a tower in this location. The purpose of this tower clearly is not to provide service to Pinelands residents, but to upgrade the service available to people driving along Route 72 to and from the beach. We believe that any safety requirements can be more than adequately satisfied with multiple antennas placed on the existing telephone poles in the very small stretch that may currently represent a "dead zone" in service (and can be augmented with call boxes for those individuals who do not have a cell phone.)

Similar concerns arise because the current Plan includes two towers [14, 21] which the Plan itself states are to be located in or near Wild & Scenic Rivers, the Great Egg Harbor and Maurice Rivers, and one [16] to be located on the Mullica River. The current Plan is simply too vague to evaluate these proposed facilities in any reliable way. For this reason, the Plan unquestionably fails to demonstrate compliance with the CMP requirements.

The CMP requires that the Plan "shall . . . *demonstrate*," for any tower to be located in any area other than a Regional Growth Area or certain Pinelands Towns, that the tower is needed to serve the local communications needs of the Pinelands and that the facility cannot use existing structures. *See* NJAS 7:50-5.4(c)1, 3 & 6 (emphasis added). The current Plan patently fails to demonstrate compliance with the need and use of existing structure requirements as to facilities Nos. 2, 5, 6, 7, 14, 16, 21 and 22. Of these, our greatest concerns lie with facilities Nos. 5, 14, 16 and 21.

2. Concerns Arising From Bifurcated Approval Process

The proposed Plan asks the Pinelands Commission to approve the number and very approximate location for towers *before* the Providers give specific information about any of the actual towers, including their actual location. The current Plan does not provide meaningful information about the details of individual towers, or of how Providers will meet site-specific requirements, and the Providers have given only the most approximate locations for these towers in the form of symbols on a map. The vagueness of the Plan in these respects creates a number of concerns for us.

First, it must be made absolutely clear to the public and the industry that approval of this or a similar Plan would be only the first step in the process of public review and Commission evaluation of the actual cellular facilities and towers. Each individual tower must meet siting requirements before it can be built. It may be that some towers *cannot* meet these requirements.

Second, the Plan does not give meaningful information on the sites proposed for scenic river corridors -- and it does not address the requirements for Scenic Corridors in general. Scenic Corridors under the regulations include not only the Mullica River, but also all roadways and many other rivers and streams.

Third, we do not believe the *map* the industry has produced is sufficiently reliable, because the Providers are unwilling even to specify the *area* they believe the circles and triangles on the map actually represent. The fact that the industry has not even given coordinates or other descriptions of the *areas* represented by each symbol on the map calls the reliability of the map itself into question. Indeed, there are rumors about Providers negotiating with land owners for placement of towers in sites that appear to be quite distant from the corresponding symbol on the Providers' map, suggesting that the map may be significantly misleading in at least some instances.

Fourth, the anecdotal evidence of PPA and of several of the individuals who testified at the public hearing on this matter strongly suggest that existing service is already very good in the vicinity of at least some of the proposed new towers. The current Plan provides no explanation of this fact, and no meaningful data to support the placement of the facilities making up the overall array. The anecdotal experiences, combined with the lack of hard data justifying the pattern, call into question whether the Plan does in fact "demonstrate" a minimum number of facilities and maximum use of existing structures as the CMP requires.

Fifth, PPA is currently attempting to obtain access to the so-called ANET data the Providers have submitted to the Commission's consultants, but the Providers appear to be resisting public access to all or part of this data. Assuming the Providers continue to oppose public access to all or some of the data, a lack of public access would profoundly undermine the entire process leading to approval of the Plan. PPA believes that if the Commission relies, either directly or indirectly through its consultants and staff, on information that is not available to the public, this element of secrecy would make a mockery of the public participation process which the Commission's procedures guarantee, and which the Commission so far has applied to this particular issue.

In light of these facts, the vagueness of the Plan creates the possibility that, even if the Commission approved the Plan, the Plan may not succeed. As the Commission has recognized in the past, the entire array of facilities depends on the location of each one of the other facilities. If one tower is removed from the array, or has to be located sufficiently far from the place

identified in the Plan, it is quite possible that the Providers will assert the entire Plan must be changed -- and that additional towers must be build -- in order to provide complete coverage. We are concerned that this approach could put undue pressure on the Commission in each site application process -- or may lead Providers to demand additional new towers beyond those many new towers proposed in this Plan. In that case, the Plan will have failed to achieve the purposes and requirements of the CMP.

These concerns lead PPA to believe that the current Plan should not be approved until the Providers:

- a. give more meaningful, and substantially more specific, information on the location of each tower for which they have not already submitted individual site applications,
- b. address what will happen in each case if a facility ultimately cannot be built where it is currently proposed. That is, the Providers should provide a back-up plan for each new facility,
- c. give sufficient information demonstrating that the Plan can satisfy the Scenic Corridors and Wild and Scenic Rivers requirements, and
- d. require that any data the Providers seek to rely upon, or ask the Commission to consider, in order to demonstrate compliance with the CMP requirements be made available for public review and copying.

Without this information, we believe that the current Plan does not meet the requirements of NJAS 7:50-5.4(c)1, 3 & 6, because it is too vague to "demonstrate" the need for each proposed facility or that the facilities will be located on existing structures to the maximum extent possible. For the same reason, this plan does not satisfy 7:50-5.4(c)6, because it does not demonstrate that the fewest possible facilities are proposed for the areas designated in the regulations. Again, the Plan makes many representations as to compliance, but does not demonstrate compliance with these requirements.

3. Use of Existing Structures

PPA submits that the proposed Plan does not meet the regulatory requirement that it demonstrate use of existing facilities wherever possible, because the Plan makes no reliable commitment to place the seven facilities in its Group 2 list on existing structures.

The Plan proposes seven facilities that *may be* located on existing structures, but carefully reserves the right to build new towers for these facilities if the Providers determine they are unable to use existing structures. The Plan merely says that "Final decisions will be made when

the facility application is pursued.”

In light of the fact that the industry is not making any genuine or reliable commitment to use existing structures for these seven facilities, PPA submits that the Commission (a) should *assume* in evaluating the Plan that all these towers will actually be new towers, and (b) should not approve the Plan, because the Providers have not demonstrated compliance with NJAS 7:50-5.4(c)3. Alternatively, the Commission should approve the Plan only upon the Providers obtaining contractual commitments sufficient to ensure that all seven facilities will be placed on existing structures.

In addition, some of the individuals who testified at the public hearing on the Plan stated as to specific towers that they were aware of existing structures nearby, but the Plan did not contemplate using those structures. Again, the combination of this anecdotal evidence and the Providers’ unwillingness or inability to provide justifications for the choices they have made in proposing certain facilities for new towers and certain for existing structures, make it impossible to conclude that the current Plan meets the requirements the CMP places upon it.

We note, moreover, the efforts of Atlantic Energy, or Connectiv, to volunteer its existing facilities as sites for cell phone antennas. Because the use of existing structures can virtually eliminate most problems with the Plan, we would expect the Providers to embrace this offer and tell the Commission and the public what it is doing to take advantage of these existing structures. The Providers, however, have not done so. This fact again calls into question the reliability of the Plan as currently proposed.

4. Industry Participation

The current Plan is presented by only a segment of the cellular telephone industry, those providing service in the 800 MHZ range. The CMP requires that all providers of “the same type of service” present a joint plan. The Providers interpret “the same type of service” to include only those using the 800 MHZ range, and to exclude other providers of telephone service, such as the PCS providers.

PPA believes it is unfortunate that the Providers here are taking that approach, because it means that this Plan is not truly comprehensive. From the *consumer’s* point of view, all segments of the industry, the Providers here as well as the PCS industry, would provide the same type of service, so the restrictive definition of the CMP appears not only unfortunate in narrowing the scope and utility of this plan, but also rather artificial.

In light of these concerns, we believe that, at a minimum, the Providers and the Commission staff should provide the Commission and the public more detailed information about exactly how exclusion of other providers may limit the current Plan, how other providers may require additional facilities beyond those set forth in the Plan, and whether the Commission

can refuse to approve additional facilities in the Pinelands if other providers come forward later on and claim the right to build new towers.

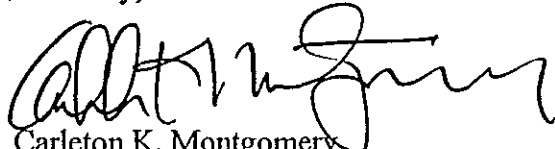
5. Co-location Provisions

The Plan contains relatively detailed commitments on co-location of different Providers' antennas on a given tower. However, the Plan leaves open the possibility that in some cases a Provider may not be permitted to locate on one of the proposed facilities. Thus, it appears a provider might in that case make a claim for the right to build a tower or install new facilities beyond those contemplated in the Plan.

We believe that the Commission should make clear in approving any Plan that a participating Provider will not be permitted to seek approval for additional facilities just because it cannot reach agreement with another Provider on co-location. Only in this fashion can the Plan satisfy the requirement that it provide for "the joint construction and use of the least number of facilities" as required by NJAS 7:50-5.4(c)6. In its current form, the Plan does not meet this requirement.

In conclusion, PPA strongly objects to building new towers in our most sensitive and extraordinary Pinelands habitats. We hope that the staff and the Commission will take the steps necessary to protect these precious and irreplaceable landscapes. We also believe that the vagueness of the current Plan makes it impossible for the Commission to determine that the Plan meets the CMP requirements. While we applaud the efforts of the Commission and the Commission staff to bring the Plan up to the standards of the CMP, we believe the Plan just is not there yet.

Sincerely,



Carleton K. Montgomery
Executive Director

REGION

July 16, 98
Atlantic City Press

Battle brews over big towers in Barnegat's dwarf forest

■ The Pinelands Preservation Alliance doesn't want to see the area's unique pygmy pines overshadowed by cell-phone towers.

By MICHAEL S. YAPLE
Staff Writer

BARNEGAT TOWNSHIP — Carleton Montgomery stands off of Route 72, overlooking a carpet of green pines stretching to the horizon in either direction.

"It's globally rare, almost unique in the United States," he said of the area where drivers can actually see over the top of the forest.

As executive director of the Pinelands Preservation Alliance, Montgomery doesn't want to see New Jersey's unique "pygmy pine" forest be the site of new construction

— particularly any of the nearly two dozen cell-phone towers that the communications industry wants to erect in the pinelands.

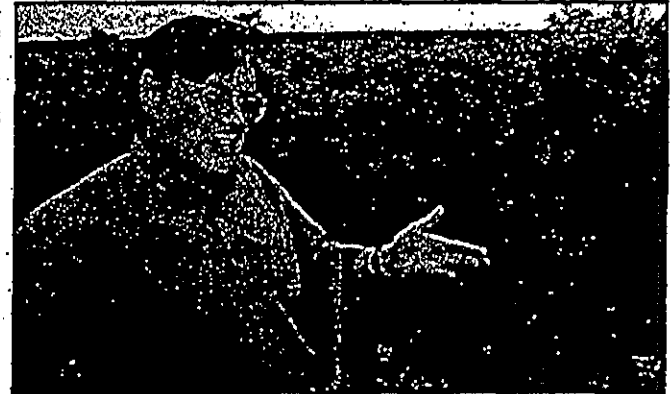
Sitting in Bell Atlantic's offices in Maryland is Heidi Hemmer, network engineering director. Her company has received numerous gripes about poor coverage throughout the pinelands' million acres.

In fact, some people who attended last week's Pinelands Commission hearing — people like fire chiefs and even school teachers — said they supported the plan to build the cell-phone towers not just for convenience, but for safety.

But others like Montgomery opposed at least parts of the plan — specifically the towers proposed along scenic rivers and the one proposed in the western Barnegat Township area of the pygmy pines.

"We understand the Preservation Alliance's concerns,

□ See Forest, Page C4



With a view of the pygmy pine forest in the background, Carleton Montgomery, executive director of the Pinelands Preservation Alliance, explains his organization's stand against placing cell-phone towers in the forest.

Staff photo by Bill Gross

Forest

(Continued from Page C1)

but we still need to provide service and we will build in that area," said Hemmer. "Not building in that area is not an option."

She said the three phone companies that proposed the cell-phone tower plan — Bell Atlantic Mobile, Comcast/Cellular One and Nextel — will do what they can to ensure the least "visual impact," as engineers call it.

But there seems to be little that could be done to conceal a tower as tall as 200 feet in a forest of 5-foot pines.

According to the phone companies' 10-year plan, as many as 23 cell-phone towers would stretch as far south as Woodbine in Cape May County northward to Barnegat and Manchester townships in Ocean County.

The Pinelands Preservation Alliance doesn't oppose the entire plan, but it is against anything in the pygmy pines or the towers proposed along three rivers: The Maurice River in Cumberland County, Great Egg Harbor River in Atlantic County and the Mullica River on Burlington County's southern border.

"It may be possible to mitigate the visual impacts along the rivers, but it's not possible to do that here," he said of the dwarf

pinetrees.

There are only two other places in the country with a pygmy pine forest, according to Andy Windsch, an ecologist for both The Nature Conservancy and the New Jersey Natural Heritage Program. One is Long Island and the other is in the Catskill area, both in New York, both about 1,000 acres.

"Ours is 10,000 acres," Windsch said.

"It's a distinct race within the species," he said of the pines, which have cones that remain closed with resin for many years until a forest fire opens them for re-seeding. "It's really a good adaptation to fire."

He also said other plant species, such as the threatened broom crowberry, rely on the sandy soil and frequent fire environment in the pine forest.

The communications companies say their proposed towers are part of a 10-year plan, and it may indeed take many years to build them by the time they get government approvals.

The Pinelands Commission is taking people's written testimony on their opinions about the cell-phone tower plan until Friday. The commission is expected to vote on the plan at a meeting within the next few months.

Even if the commission approves the plan, the communications companies would still need local-government approval to build each of the towers.

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OCERTIFIED CIVIL
TRIAL ATTORNEY
A CERTIFIED CRIMINAL
TRIAL ATTORNEY

CLIENT/MATTER NO.

9164/006

July 30, 1998

VIA LAWYERS SERVICE #8573777

Terrance Moore, Executive Director
The Pinelands Commission
15 Springfield road
New Lisbon, New Jersey 08064

Re: Comprehensive Plan for Wireless Communication Facilities in the Pinelands
Response to Public Hearing Comments

Dear Mr. Moore:

We are in receipt of a notice that the comment period in the above-referenced matter has been extended until July 31, 1998. We are also in receipt of a copy of a letter dated July 13, 1998 from Stephen M. Aspero, Esq., submitted on behalf of GPU Telcom Services, Inc. and Jersey Central Power & Light Co. d/b/a GPU Energy.

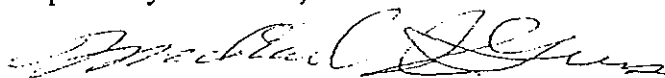
Our clients have reviewed the location of the GPU infrastructure in the northeast sector of the Pinelands area and have determined that none of the infrastructure available is suitable, at this time, to serve the needs of the CPs. In addition, Bell Atlantic Mobile and GPU have recently revived negotiations on a master lease agreement. If such a master lease agreement is reached and if collocation on the GPU towers will satisfy the service needs of the CPs, these towers may be considered in the future. At this time, however, these towers do not meet service needs as identified in the proposed Comprehensive Plan. We appreciate GPU Telcom's commitment to allow use of its facilities on a fair and reasonable basis and where feasible, on a collocation basis.

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ATTORNEYS AT LAW

Terrance Moore, Executive Director
July 30, 1998
Page 2

If appropriate, these CPs would take advantage of these towers, but cannot given the current configuration of the towers and the needs analysis.

Respectfully submitted,



MICHAEL J. GROSS

MJG/ew

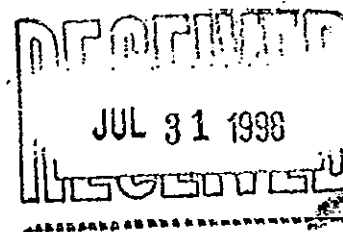
Cc: Heidi Hemmer
Warren Stillwell, Esq.
S. Thomas Gagliano, Esq.

::ODMA\PCDOCS\GHCDOCS\9676\1

Jack J. Salemi
5 Bridlewood Ct.
Tabernacle, NJ 08088

July 31, 1998

Mr. Terrance Moore
Pineland Commission
PO Box 7
New Lisbon, NJ 08064



Dear Mr. Moore,

Thank you for having Betsy Piner and John Stokes ask for, and receive the consultants technical report regarding site #7 in Woodland Twp. I reviewed their report yesterday, and not being an engineer to understand the graphs, I did my own field test this morning.

DATE: 7/31/98

TIME: 08:15 AM

CONDITIONS: Rainy

DRIVE LOCATIONS: From RT. 206, and RT. 70 (Red Lion Circle) East Bound to Rt. 72 (4 Mile Circle), then to Pemberton.

RESULTS: No interference or loss of communication, while traveling along this route.

I called my home using my standard car phone, under the Comcast service. At Rt. 206 and Rt. 70 (Red Lion Circle), the reception was not as clear as traveling East Bound on Rt. 70 and actually improved the closer I drove to RT. 72 (4 Mile Circle).

CONCLUSION: There is cell phone coverage here under the Comcast network, using the 5 towers already constructed in the general area. The consultants original recommendation to move Site #7 in Woodland Twp. to Rt. 70 and Rt.206 (Red Lion Circle) should be carried out, and Site #7 in Woodland Twp. should be eliminated.

THERE IS NO NEED FOR SITE 7 IN WOODLAND TWP., DUE TO ALREADY EXISTING COVERAGE.

While at the Farm Fair in Lumberton, NJ on Friday, 7/24/98, my wife, Michele, my three children and myself, along with Carl Pulaski, a neighbor, stopped at the Comcast Booth. We spoke to their representative Mr. Thomas J. Wolfe, He stated, "Comcast has full State of New Jersey Coverage". He is the Sales Manager for Nationwide Roadside Assistance, Cellular/Digital Phone Sales. He is located at the Heritage Bldg. 703 Stokes Road in Medford, NJ 08055. Phone 1-800-IN TOWN-1. He gave me his card and wrote the coverage area on the back. (Copies included)

I hope the Pineland Commission makes the correct decision concerning site #7, and minimizing the tower construction in the entire Pineland Region.

PLEASE CONSIDER: * There is existing coverage concerning site #7, consequently, this location is not needed.

- * Their will be visual impact at site #7. This 180 ft. tower will far exceed the height of the trees, photo's submitted in Mays Landing.
- * Site #7 is part of the most pristine of the Pineland Region and should be preserved, not visually polluted.
- * Property value issues, under equal conditions, people prefer a home without any questionable problems and towers are perceived as questionable health problems. (Article submitted in Mays Landing).
- * Bell Atlantic Rep., Harry Fisher, stated under oath, at 's Woodland Township's initial meeting, that if you took the existing towers and overlap the areas of coverage, there is coverage with some dead spots. Bell Atlantic should Erect the Rt. 206 & Rt. 70 Location, or co-locate on the existing Comcast towers.
- * Utilize the Atlantic Electric already existing towers, as per Michele Costello, Atlantic Electric Rep. (609) 625-5820.
- * 911 Emergency Issue is not reliable service, do to the fact that it is impossible to pin-point the exact location of the call. It is simply a good back-up for the already widely used 2-way radio system.
- * Electric fences surrounding each tower site are a concern for children and wildlife.
- * Back-up fuel driven generators at each tower site in the dry forest region is a forest fire concern.

- * Building an access road to serve site #7 would mean the removal of many trees in this pristine area. Each location must be luminated 100% of the day and night. Each location must run an air condition unit for cooling, what is the level of noise emitted. NOISE POLLUTION.
- * Foundation 40 ft. deep into drinking wells of people who live in the area of each 180 ft tower.
- * Electro Magnetic Energy emitted off every tower is an untested science. Steven Foster, the cell phone spokesman for the cell industry, was quoted as saying that, "It is beyond the ability of science to prove there's a hazard. People are asking questions that basically can't be answered". Asbury Park Press 7/24/94.
- * Senator Byron Baer, requesting a Senate hearing of the safety of Driving and talking on a cell phone. The cell phone future is uncertain.
- * Dr. John Violanti, at the Rochester Institution of Technology, conducted a 5 year study of driving/talking on a cell phone. He concluded there is a 34% greater chance of causing an accident while driving. Dr. Violanti phone # 716-475-2393.

People love the Pinelands Region for the beauty it offers to bike, nature hike, boat, fish, camp and get away from reality. The Pineland Preservation Alliance has stated that 70% of the Pinelands already has coverage. Let's keep it pristine and do what is right for the area, not the industry.

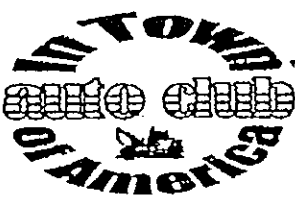
(Bylines 1992)
JJS

Sincerely,



Jack J. Salemi

FARM FAIR 7/24/98



Thomas J. Wolff
Sales Manager

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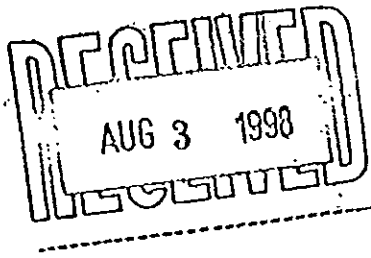
11/09

PARKING

\$5

Thank You

The parking fee benefits the Farm Fair Organization
and the Northern Burlington County NFA Chapter.



Mr. & Mrs. John G. Takacs
8 Hampshire Court
Evesham Twp., NJ 08053

Mr. Moore, Director
The Pinelands Commission
PO Box 7
New Lisbon, New Jersey 08064

Re: Comprehensive Plan
Application No.: 98-0272.01

Dear Mr. Moore:

We are writing this letter to express our objection to the above application by Bell Atlantic Mobile to erect a 200 foot cellular tower at 282 Chestnut Avenue, Evesham Township, New Jersey. Our property borders Chestnut Avenue and it is approximately two blocks from the proposed site. Notwithstanding Bell Atlantic's representations, this tower would be visible from our house.

We have reviewed Urban Engineers, Inc. letter dated 5-19-98 and addressed to William Harrison, Esquire. It is evident from this letter that the proposed site does not satisfy the requirements of N.J.A.C. 7:50-5, et seq. The report is full of unsubstantiated statements and, quite frankly, misleading facts.

In particular, the code at section 7:50-5.4(c)3 mandates that "the antenna utilize(s) all existing communications on other suitable structure...The engineer's report claims that there exists no existing structure...for multiple users." However, the report does not set forth why Bell Atlantic needs an antenna for multiple users. Evidently, there exist pre-existing structures to both satisfy the code requirements as well as Bell Atlantic's requirements. However, Bell Atlantic does not want to simply meet their needs. They clearly want to build a large, unsightly, 200 foot tower in the middle of a relatively urban suburban area in the pinelands, then subcontract this tower's

capabilities out to other cell phone providers. This is not acceptable and should be rejected solely on this basis.

To impose a cell phone tower next to a YMCA camp amongst numerous residential properties will most certainly denigrate the aesthetics of our community, as well as the surrounding pinelands. This proposal is in contravention of the N.J.A.C. and the very essence of what the pinelands are meant to be.

Ostensibly, Bell Atlantic wishes to enhance their service in our vicinity, and therefore, should be relegated to use pre-existing structures throughout the area. It is an insult to hide behind this pretense and ask that a tower be placed in an area that is an enclave of tranquility within an ever increasing urbanized environment purely for economic reasons. The Pinelands Commission was not established to sanction this offensive corporate behavior and should deny Bell Atlantic's proposed plan as too visually obtrusive upon the recreational facilities, major and minor roadways, existing residences and the many trails and paths that exist throughout the wooded area in the immediate and proximate area.

We trust this letter conveys our strong opposition to Bell Atlantic's proposal. Should this tower be built, it will only serve as an excuse for another entity to seek further devastation of a fragile environmental area. The Pinelands Commission needs to preserve and enhance the aesthetics of our area and carefully adhere to its mandates.

Sincerely,

A handwritten signature in cursive script that reads "Mr. & Mrs. John G. Takacs". The signature is written in dark ink and is positioned above the typed name.

Mr. and Mrs. John G. Takacs

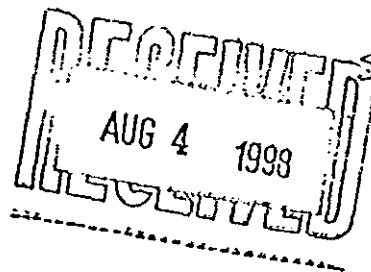
8.3.98

Pineland Commission,

I wish to express my opinion
that the Pineland Commission NOT
permit the construction of cellular
towers in the pine plains, ever.

We must hold our ground
against every unsound development
scheme -

Build the towers next to the
fire towers or within Pineland
communities (group development).



Sincerely,

CHRISTEN ERICHSEN
NEW GRETNA

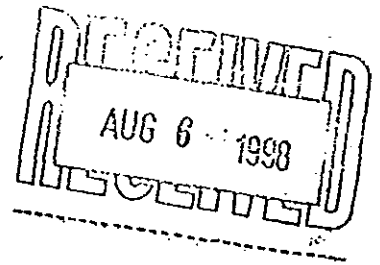


Manchester Township

1 Colonial Drive

Lakehurst, New Jersey 08733

(908) 657-8121



August 3, 1998

THE PINELANDS COMMISSION

P.O. Box 7

New Lisbon, NJ 08064

Attn: Mr. Terrence D. Moore, Director

Re: PROPOSED CELL TOWER FACALITIES PLAN

Dear Mr. Moore:

I attended the meeting hosted by the Pinelands Commission held on July 9th concerning the revised cell tower plan.

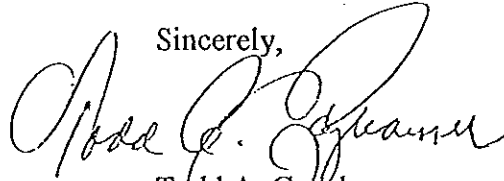
It was encouraging to hear that the new plan proposed 16 new towers as opposed to 26 in the previous request. However, as reflected by the many comments made at the meeting, the recent plan still lacks clarity with regard to specific locations. It is very difficult to assess the impact on local land use when a tower could be located within five miles from where it is shown on the proposed siting map.

For instance, within five miles of the proposed site in the Beckerville area of Manchester Township is our POR-LI (Pinelands Office Research-Light Industrial) zone. Recently adopted ordinance 98-008 added regulations for the location and approval of wireless telecommunications towers and antennas within the township. If locations were more site specific, the proposed tower could be shown in that zone where it would be deemed a permitted use, and could be designed and regulated by ordinance. Further, Manchester Township Ordinance 98-008 and the Master Plan for tower locations would be in agreement.

We ask that the Pinelands Commission take our concerns into consideration before final adoption of the plan.

Thank you.

Sincerely,

A handwritten signature in cursive script, appearing to read "Todd A. Ganghamer".

Todd A. Ganghamer
Director of Planning & Zoning