**Public Comment Received on PCS Plan**
**Original Closing Date (11/22/99) Extended to 12/17/99**

Updated as of December 17, 1999

| # | Date of Submission | Name | Mailing Address | Type of Submission |
|---|---|---|---|---|
| 1. | 11/15/99 | Douglas L. Heinold | Parker McCay & Criscuolo Three Greentree Center Marlton NJ 08053 | Fax |
| 2. | 11/18/99 | Lynn Kendrick | P.O. Box 207 Dorothy NJ 08317 | Email |
| 3. | 11/18/99 | John H. Robinson | 23 Schoolhouse Lane Cape May Ct Hse., NJ 08210 | Email |
| 4. | 11/18/99 | Laura Lynch | 11 Lumar Rd. Lawrenceville, NJ 08648 | Email |
| 5. | 11/18/99 | Geraldine Satz | 96 Atlantic Avenue Margate NJ 08402 | Email |
| 6. | 11/18/99 | Fred Schaum | 105 Stoney Brook Rd Towaco, NJ 07082 | Email |
| 7. | 11/18/99 | Zwerling Family | 77 4th St Somerset, NJ 08873 | Email |
| 8. | 11/18/99 | Mike Medici | PO Box 53 Morris Plains NJ 07950 | Email |
| 9. | 11/18/99 | Sunil Somalwar, PhD | 1015 S. Park Ave. Highland Park, NJ 08904 | Email |
| 10. | 11/19/99 | Veronica Rowan | 239 Montgomery St. 2C Highland Park, NJ 08904 | Email |
| 11. | 11/19/99 | Craig S. Farrell | 14 Jessica Place Monmouth Beach NJ 07750 | Email |
| 12. | 11/19/99 | James C. Scott | 2 Judith Court Ocean Twp. NJ 07712 | Email |
| 13. | 11/19/99 | Jakob Franke | 424 Tappan Road Northvale, NJ 07647 | Email |
| 14. | 11/19/99 | Gay A. Raab | 2467 Route 10 East Bl. 31-4A Morris Plains NJ 07950 | Email |

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|---|---|---|---|---|
| 15. | 11/19/99 | William R. Berbaum | 41 Watchung Plaza Ste. 381<br>Montclair NJ 07042-4117 | Email |
| 16. | 11/19/99 | Fran Duggan | 102 Ilford Avenue<br>North Arlington NJ 07031 | Email |
| 17. | 11/19/99 | David Hays Buckley | 90 Jefferson Avenue<br>Maplewood NJ 07040-1231 | Email |
| 18. | 11/19/99 | C Solomon | | Email |
| 19. | 11/19/99 | Joseph Phillips | 4 Picardy Road<br>Succasunna NJ 07876 | Email |
| 20. | 11/19/99 | Tanya G McCabe | 375 Union Ave<br>Belleville NJ 07109 | Email |
| 21. | 11/19/99 | Loren D. Mendelsohn | 3 Morris Place<br>Towaco NJ 07082 | Email |
| 22. | 11/19/99 | Tom Boghosian | 3722 Lehigh Court<br>Mays Landing NJ 08330 | Email |
| 23. | 11/19/99 | Liz Marshall | 5 Old Orchard Rd<br>Hardwick NJ 07825 | Email |
| 24. | 11/19/99 | Ron McGee | 64 Birch Road<br>Ringwood NJ 07456 | Email |
| 25. | 11/19/99 | Camille Gutmore | 181 River Road<br>Nutley NJ 07110 | Email |
| 26. | 11/19/99 | Andrew S. Ewing<br>Conservation Chair | Bergen Co. Chapter<br>National Audubon Society<br>490 Vance Ave<br>Wyckoff, NJ 07481-1130 | Email |
| 27. | 11/19/99 | Patricia Salese<br>Conservation Chair | Sierra Club (Loantka group)<br>15 Springholm Drive<br>Berkeley Heights NJ 07922 | Email |
| 28. | 11/19/99 | Philip Salkie | 547 West Hill Rd<br>Califon NJ 07830 | Email |
| 29. | 11/19/99 | Lisa Carolina Gonzalez | 14706 Manor Road<br>Phoenix MD 21131 | Email |
| 30. | 11/19/99 | Lois M Lasher | 824 Third Place<br>Plainfield NJ 07060 | Email |

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|---|---|---|---|---|
| 31. | 11/19/99 | William R. Schultz | 46B Bartle Court<br>Highland Park, NJ 08904-2032 | Email |
| 32. | 11/19/99 | Filomena Brogna | 301 West Sylvania Ave<br>Neptune City NJ 07753 | Email |
| 33. | 11/19/99 | Jonathan Goodnough | 711 Adams St #2<br>Hoboken NJ 07030 | Email |
| 34. | 11/19/99 | Andrea Zacharias | Rutgers University<br>26226 DPO Way<br>New Brunswick NJ 08901 | Email |
| 35. | 11/19/99 | Jason Kurtz | 55 Morgan Place<br>North Arlington NJ 07031 | Email |
| 36. | 11/19/99 | Prof. Richard H. Colby | Richard Stockton College<br>Pomona NJ 08240-0195 | Email |
| 37. | 11/19/99 | Robert Galanty | 284 Kennedy St<br>Iselin NJ 08830 | Email |
| 38. | 11/19/99 | Bob Praetorius | 39 Dennis Ct.<br>Hightstown NJ 08520 | Email |
| 39. | 11/19/99 | Bob Moyer | 2424 Phillips Rd<br>Forked River NJ | Email |
| 40. | 11/19/99 | Hugh M. Carola | 30 Maple Ave<br>Hackensack, NJ 07601 | Email |
| 41. | 11/19/99 | Paul Schickler | 901 Ave. H, Apt. 1E<br>Brooklyn NY 11230 | Email |
| 42. | 11/19/99 | Kerry Miller | 549 Winsor Street<br>Bound Brook NJ 08805 | Letter |
| 43. | 11/20/99 | Pat Palmer | 165 Harrison St<br>Princeton NJ 08540 | Email |
| 44. | 11/20/99 | Edith Biondi | 520 Haworth Ave<br>Haworth NJ 07641 | Email |
| 45. | 11/20/99 | Loretta Dunne | 125 North Drexel Street<br>Woodbury NJ 08096 | Email |
| 46. | 11/20/99 | Michael S. Brown | 159 Carlisle Rd<br>Audubon NJ 08106-1209 | Email |
| 47. | 11/20/99 | Brian E. Bragg | 110 Passaic Ave<br>Summit NJ 07901 | Email |

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|---|---|---|---|---|
| 48. | 11/21/99 | Ellen Friedman | 524 Main St<br>Lodi, NJ 07644 | Email |
| 49. | 11/21/99 | Richard Goldsmith<br>Rywzaz@aol.com | 115 Vanderveer Avenue<br>Somerville, NJ 08876 | Email |
| 50. | 11/21/99 | Michael Gallaway<br>Pinelands Coordinator<br>NJ Chapter of Sierra Club | 36 West Lake Rd.<br>Medford NJ 08055. | Email |
| 51. | 11/21/99 | Bob Jonas | 756 Crescent Pkwy<br>Westfield NJ 07090-2304 | Email |
| 52. | 11/22/99 | Matthew L. Visco | 25 Colts Neck Terrace<br>Yardville NJ 08620 | Email |
| 53. | 11/22/99 | Virginia Calder | 64 Academy Circle<br>Oakland NJ 07436 | Email |
| 54. | 11/22/99 | Peter Weckesser | 228 Hidden Woods Ct.<br>Piscataway NJ 08854 | Email |
| 55. | 11/22/99 | John Emerich | 24 Altamont Rd<br>Edison, NJ 08817 | Email |
| 56. | 11/22/99 | David Korfhage | 19 Heritage Blvd<br>Princeton, NJ 08540 | Email |
| 57. | 11/22/99 | David Wasmuth | 651 Riverside Ave. C-40<br>Lyndhurst NJ 07071 | Email |
| 58. | 11/22/99 | Barbara Reisman | 69 Essex Avenue<br>Montclair NJ 07042 | Email |
| 59. | 11/22/99 | Robert P. Jusko | 2114 W. Lacey Rd<br>Forked River, NJ 08731 | Email |
| 60. | 11/22/99 | Laurel Kornfeld | 106 North Sixth Avenue<br>Highland Park, NJ 08904 | Email |
| 61. | 11/22/99 | Jane Nogaki<br>Board of Trustees | NJ Environmental Federation<br>223 Park Avenue<br>Marlton NJ 08053 | Email<br>(followed by letter) |
| 62. | 11/22/99 | Michael J. Herson | 451 Hasbrouck Blvd<br>Oradell, NJ 07649 | Email |
| 63. | 11/22/99 | Stephen R. Knowlton | 77 Church Street<br>Fair Haven NJ 07704 | Email |

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|---|---|---|---|---|
| 64. | 11/22/99 | Patricia Sziber | 19 Wildwood Way<br>Titusville NJ 08560 | Email |
| 65. | 11/22/99 | Debra Minter | 101 Boardwalk #901<br>Atlantic City NJ 08401 | Fax |
| 66. | 11/22/99 | Paul Tarlowe | 40 Brookside Ave<br>Hackettstown NJ 07840 | Email |
| 67. | 11/22/99 | Carleton Montgomery<br>Executive Director | Pinelands Preservation Allnce.<br>114 Hanover St<br>Pemberton, NJ 08068 | Fax |
| 68. | 11/23/99 | Robert F. Hesse | 5 Mawhinney Ave.<br>Hawthorne, NJ 07506 | Email |
| 69. | 11/24/99 | Michael Gordon<br>Conservation<br>Assistance Manager | National Park Service<br>200 chestnut Street<br>Philadelphia PA 19106 | Fax |
| 70. | 11/30/99 | David A. Harpell | 2417 Ramshorn Drive<br>Manasquan NJ 08736 | Email |
| 71. | 11/30/99 | Jonathan Stillwell | 121 Oswego Avenue<br>Audubon, NJ 08106 | Email |
| 72. | 12/02/99 | Amie Osowski | 35 Glen Manor Drive<br>Glen Gardner, NJ 08826 | Email |
| 73. | 12/15/99 | Bob Moyer | 2424 Phillips Road<br>Bamber Lake, NJ 08731 | Email |
| 74. | 12/15/99 | Mildred/Edward<br>Kaliss | 137 Chaucer Place<br>Cherry Hill, NJ 08003 | Email |
| 75. | 12/16/99 | Clifford G. Day,<br>Supervisor | US Department of Interior<br>Fish & Wildlife Service<br>927 North Main Street Bldg. D1<br>Pleasantville, NJ 08232 | Fax/Letter |
| 76. | 12/16/99 | Carleton Montgomery<br>Executive Director | Pinelands Preservation Allnce.<br>114 Hanover St<br>Pemberton, NJ 08068 | Fax/Lettter |
| 77. | 12/17/99 | Michael Gross, Esq.<br>Giordano, Halleran &<br>Ciesla | PO Box 190<br>Middletown, NJ 07748 | Letter |

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PMC
Parker McCay & Criscuolo P.A.
ATTORNEYS AT LAW

Three Greentree Centre
Route 73 and Greentree Road
Marlton, New Jersey 08053
Telephone: 856-596-8900
Telecopier: 856-596-9631
Email: pmcapmclaw.com
Web: www.pmclaw.com

November 15, 1999

File No. 09325-0001

Via Fax: (609)894-7330
John C. Stokes, Assistant Director
The Pinelands Commission
P. O. Box 7
New Lisbon, NJ 08064

**Re: EVESHAM TWP. – Cell Towers**
**Proposed Plan by Sprint/Omnipoint**

Dear Mr. Stokes:

As you know, this office acts as Solicitor for the Township of Evesham. I am in receipt of Sprint and Omnipoint's proposed plan for the location of cell towers within the Pinelands. On page 13 of the plan, Sprint proposes "Facility 28" within the next five (5) years in Evesham Township, presumably to be collocated on "Facility 9" as proposed in the plan presented by the original three providers.

Facility 9 is the Bell Atlantic tower, which the Township has vigorously opposed since July of 1998. The Township's main difficulty with Facility 9 is its location near residential development. The Township has taken great steps to reasonably address the location of cell towers within its borders, including passage of the first Pinelands' approved cell tower ordinance. Litigation by Bell Atlantic challenging our ordinance was defended. At this point, Bell Atlantic is no longer pursuing that site, and the litigation between the Township and Bell has been amicably resolved between the parties, with the assistance of your office.

For obvious reasons, the Township continues to oppose Facility 9, now referred to as Facility 28. It is respectfully submitted, in light of the history of this issue, that any plan by Sprint and/or Omnipoint that is accepted by the Pinelands must not include this site and must otherwise conform to Evesham's Cell Tower Ordinance.

PMC
Parker McCay & Criscuolo P.A.
ATTORNEYS AT LAW



I will be present at tomorrow evening's meeting on this issue, at the County College Teleconference Center, to voice these concerns for the record. Thank you for your consideration in this regard.

Very truly yours,
Parker, McCay & Criscuolo, P.A.

DOUGLAS L. HEINOLD

cc: Mayor Augustus F. Tamburro (Via Fax: 983-2022)
Florence N. Ricci, Township Manager (Via Fax: 985-3695)

**Lynnk3377@aol.com, 08:38 AM 11/18/19, Cell phone towers in Pinelands**

From: Lynnk3377@aol.com
Date: Thu, 18 Nov 1999 08:38:02 EST
Subject: Cell phone towers in Pinelands
To: planning@njpines.state.nj.us
X-Mailer: AOL 4.0 for Windows 95 sub 243

Regarding the proposals for new cell phone towers in the Pinelands:
As an ordinary citizen, residing in Weymouth Township, Atlantic County, I
would like to cast a vote in favor of the towers in Maurice River Township
and Estell Manor Township.
I have had a cell phone for over 3 years, and use it mostly for emergencies.
On several occasions I have had to use the phone when I was at home - in
situations such as sudden loss of land-based telephone service, which we
experience frequently. I have never been able to get a cell phone signal,
and thus, have to drive about a half-mile from my home to Tuckahoe Road, park
on the side of the road, and make my cell-phone call. If these situations
had been life-threatening emergencies, what would I have been able to do?

If the technology is available to avert situations such as the above, it
should be used-for the greater good. I am not anti-environment, and the
preservation of any land is a good thing. But the preservation of just one
life is of far greater value.

The placement of towers in sensitive areas should not be denied, but the
construction should be done in the least damaging way possible . Please
consider the broad implications that can, and will, be brought about by
denial.

Lynn Kendrick
Dorothy, New Jersey

Complete mailing address for Lynn Kendrick:
P.O. Box 207, Dorothy, N.J., 08317

From: "John H. Robinson" <jsrob@bellatlantic.net>
To: "Betsy Piner" <planning@njpines.state.nj.us>
Subject: Re: PCS Towers
Date: Fri, 19 Nov 1999 12:05:01 -0500
X-MSMail-Priority: Normal
X-Mailer: Microsoft Outlook Express 4.72.3110.1
X-MimeOLE: Produced By Microsoft MimeOLE V4.72.3110.3

Mrs. Piner,
My complete mailing address is:
John Robinson
23 Schoolhouse Ln.
Cape May Ct. Hse., NJ
08210
-----Original Message-----
From: Betsy Piner <planning@njpines.state.nj.us>
To: John H. Robinson <jsrob@bellatlantic.net>
Date: Friday, November 19, 1999 8:49 AM
Subject: Re: PCS Towers

>Thank you for your comment regarding the PCS plan. In order for us to have
>a complete record of your submission, would you kindly send us your
>complete mailing address. Thank you.
>
>At 12:55 PM 11/18/1999 -0500, you wrote:
>>I would just like to say that I feel ANY new cellular, PCS, or other type
>of tower in the Pinelands should be discouraged. Why should we destroy
>irreplaceble forrest for the sake of phone service? Our precious pinelands
>are more important than phone service!
>>I ask you NOT to approve any more destruction of our trees. Please limit
>phone towers to already existing towers and structures such as water
>towers. I now reside in Cape May Court House, but was raised in Estell
Manor.
>>Estell Manor has already been ravaged by new home construction. There is
>an already existing tower in the Dorothy section of Weymouth Township that
>intertwines borders with Estell Mnaor. Can't this location be considered?
>>Thank you for your time.
>>John Robinson
>>

From: llynch@dept.english.upenn.edu (Laura Lynch)
Subject: Pinelands Cell Towers
To: planning@njpines.state.nj.us
Date: Thu, 18 Nov 1999 21:11:29 -0500 (EST)
X-Mailer: ELM [version 2.4 PL23-upenn3.3]

(This is a copy of what I sent earlier today, except that this contains my
mailing address at the bottom.)

> Dear Sir or Madam:
>
> I am writing to protest the planned installation of cellular phone towers
> in the New Jersey Pinelands.
>
> There is as yet no proven need for more towers; if the plan is to be
> approved, please conduct a study to demonstrate need.
>
> Two of the proposed towers are to be placed near the Great Egg Harbor
> River, which is federally protected under the Wild and Scenic Rivers Act.
> Cellular phone towers aren't wild, and they certainly are not scenic.
>
> Although the Pinelands Commission might require some of the towers to
> blend into the scenery, it is difficult to imagine how this will be done
> in the Pine Plains, where trees typicaly reach a maximum height of
> approximately ten feet or less.
>
> Lately, the Pinelands Commission has seemed to be determined to undermine
> the preservation of the Pinelands: the CMP has already been amended to
> allow the building of a high school on previously protected land in
> Tabernacle, and the head of the Commission - a known environmentalist -
> has been ousted for his anti-development leanings.
>
> The Pinelands Comprehensive Management Plan was designed to preserve the
> Pinelands while allowing for careful, controlled development. The
> Pinelands Commission was formed to carry out the CMP. By allowing

> seemingly small encroachments, such as cellular phone towers, into
> undeveloped regions of the Pinelands, the Commission is setting a bad
> precedent for future development.
>
> Please carefully consider what you are about to do. If you keep chipping
> away at the Pinelands, you might find that you've put yourselves out of
> work.
>
> Sincerely,
>
> Laura Lynch
11 Lumar Rd.
Lawrenceville, NJ 08648

> llynch@english.upenn.edu

X-WebTV-Signature: 1
ETAsAhQGvVOLQiz5iUAIV6Aif9AF9E9XMQIUI+eFXLPGUZ4GB2chAaUDu
nfAhgQ=
From: GerrieS@webtv.net (Geraldine Satz)
Date: Thu, 18 Nov 1999 21:28:51 -0500 (EST)
To: planning@njpines.state.nj.us
Subject: Pinelands

No new towers. The pinelands are a New Jersey treasure. Let's keep it
that way. Geraldine Satz, 9600 Atlantic Ave., Margate, N.J. 08402.
609-487-0132

Gerrie
Let's go birding!

From: PFSchaum@aol.com
Date: Fri, 19 Nov 1999 10:27:44 EST
Subject: Re: Cellular Towers
To: planning@njpines.state.nj.us
X-Mailer: Windows AOL sub 45

In a message dated 11/19/99 8:44:59 AM Eastern Standard Time, planning@njpines.state.nj.us writes:

<< Thank you for your comment regarding the proposed PCS Plan. In order for us
to have a complete record of your submission, would you kindly submit your
complete mailing address. Thank you.

At 09:39 PM 11/18/1999 EST, you wrote:
>Please do not put cellular towers in the NJ Pinelands. It's time to draw
the
>line to mindless development and preserve what little we have of our
natural
>land.
>
>Fred Schaum
>
>E-Mail: pfschaum@aol.com
> >>
The mailing address is 105 Stoney Brook Rd, Towaco, NJ 07082

From: EZwerling@aol.com
Date: Thu, 18 Nov 1999 21:54:22 EST
Subject: Please Say No to Cellular/PCS Towers
To: planning@njpines.state.nj.us
X-Mailer: Windows AOL sub 45

To Whom It May Concern,

The Pine Barrens are a unique natural heritage that we must preserve for my kids and their kids' sakes. The introduction of 200 foot towers into these pristine areas is simply another foot in the door, another chipping away at the unspoiled beauty of the barrens. A little now, a little more tomorrow and finally there will be nothing left to preserve - no one will think the tattered remains are worth preserving. The whole state will look like Route 18 in East Brunswick, which was once quite beautiful.

Please hold the line, now and forever.

Please preserve OUR Pine Barrens.

The Zwerling Family (Eric, Naomi, Matthew, Samantha)
77 4th St.
Somerset, NJ 08873
(732)932-8065

Date: Thu, 18 Nov 1999 22:51:05 -0500
From: Mike Medici <medici@iname.com>
X-Mailer: Mozilla 4.61 [en]C-CCK-MCD (Win98; I)
X-Accept-Language: en
To: planning@njpines.state.nj.us
Subject: Cell Towers

I have photographed the changing landscape of the Pinelands for many
years. As you well know this is a unique and treasured resource and
should be preserved for future generations to enjoy.

Unfortunately if you continue to allow further development of any kind
including the ridiculous cell towers you will have permitted further
destruction of this unique land.

I invite you to join me on a walking trip through the Pinelands and I am
sure on this journey the wonder and beauty will overtake you !

RESIST THE POWER AND CONTROL OF THE CORPORATIONS AND POLITICAL INFLUENCE
!

IF YOU CANNOT PROTECT THE PINES, THEN STEP DOWN FROM YOUR POSITION AND
ALLOW OTHERS "WHO ARE CONCERNED" FOR THE PRESERVATION OF THIS WONDER TO
REPLACE YOU !

DON'T ALLOW THE TOWERS TO BE BUILT, NOR ANY OTHER DEVELOPMENT!

Mike Medici
PO Box 53
Morris Plains, NJ 07950

email medici@iname.com

X-Originating-IP: [128.6.248.8]
From: "Sunil Somalwar" <svsomalwar@hotmail.com>
To: planning@njpines.state.nj.us
Subject: PCS tower in the Pinelands
Date: Thu, 18 Nov 1999 21:07:23 PST

Dear Planner,

Please - absolutely no transmission tower in the Pinelands.
Thank you,

Sunil Somalwar, Ph.D.
1015 S. Park Ave.
Highland Park, NJ 08904

Date: Fri, 19 Nov 1999 00:13:47 -0500
From: Veronica Rowan <aradya@eden.rutgers.edu>
X-Mailer: Mozilla 4.7 [en]C-AOL (Win98; I)
X-Accept-Language: en
To: planning@njpines.state.nj.us
Subject: PCS tower plan

Aren't there enough towers in the area already? I don't see the need
for any more.

Veronica Rowan
239 Montgomery st. 2C
Highland Park, NJ 08904

From: "Craig Farrell" <csfarrell@home.com>
To: <planning@njpines.state.nj.us>
Subject: Proposed Cell Towers in Pinelands
Date: Fri, 19 Nov 1999 00:26:22 -0500
X-MSMail-Priority: Normal
X-Mailer: Microsoft Outlook Express 4.72.3110.5
X-MimeOLE: Produced By Microsoft MimeOLE V4.72.3110.3

Dear Pinelands Commission Members:

A recent article in the The Press of Atlantic City brought to my attention
that you will soon be reviewing a request by Omnipoint and Sprint PCS to
build PCS towers in the Pinelands.

The article sheds little light on the location, height, and environmental
impact of the towers. I would hope that you would be more thorough in your
investigation of this matter than The Press of Atlantic City was. Some of
your recent decisions indicate a pro-development, pro-business stance that
shows little regard for preserving a tremendous example of God's creation
for our children.

Do not stick your heads in the Pinelands sand and attempt to ignore the
consequences of your actions. While Sprint PCS and Omnipoint and the rest of
corporate America may love you guys for your willingness to destroy the
Pinelands, future generations will recognize your lack of willpower and
inability to resist the siren call of greed.

Nature can recover from man's environmental destruction; too bad that it can
takes hundreds and sometimes thousands of years. The Pinelands is a unique
ecological resource that future generations should be able to enjoy in a
state unsullied by man. It's not too late for the Pinelands Commission to
start acting like they care about preserving the Pinelands for future
generations.

If you get the chance, please ask these questions for me during

your
examination of this issue:

Moshe Kam - He is apparently your hired consultant. I am concerned about
conflicts of interest. Has he ever worked for Sprint PCS or Omnipoint or any
of its business partners? Does he have a business relationship with any
Commission members or their businesses? Does Drexel University receive any
funding from the companies involved or from industry promotional organizations? If he has worked for the Pinelands Commission before, did he
recommend in favor of industry or in favor of environmentalists?

Second opinions - The need for more towers is based on principles of
cellular and PCS network design. How many PCS or cellular networks has Moshe
Kam designed? Is all his knowledge theoretical, or has he actually built a
PCS network? I would suggest getting a second opinion, since there is great
likelihood that you're not going to get the other side of the story.
University professors are typically teaching information that is 5 years
behind the technology they are supposedly experts in. This is the Internet
age, and professors have a hard time keeping up with the pace of technology.
In Mr. Kam's case, to have the industry expertise to advise you on this
matter would mean he has designed networks for the major cellular and PCS
vendors in America. If they are his customers, you cannot possibly hope for
him to provide an unbiased opinion.

If they are not his customers, then he probably doesn't know what he is
talking about. If that is the case, then just find yourself an independent
consultant who is not a professor. He would probably know more about the
industry.

Height and location of towers - The article does not shed much light on
this. Seems like some key information to me.

Environmental impact of new towers - What about it? Is there a lot of trench digging and other acts of rape on the Pinelands? Forget how ugly these towers are; you can disguise them as pine trees and they'll still be an eyesore.

Necessity of Cellular and PCS in the Pinelands - I mean really, do we need more cellular and PCS in the Pinelands? The primary users of these services are businesses. Is the Pinelands Commission supposed to be pro-business, pro-technology? Is that what the Pinelands is about? Do we want the Pinelands to be just like Northern New Jersey? Do we want the congestion, the over-development, the orgy of greed and utter disregard for God's landscape that is northern New Jersey? I think not.

Is Cellular and PCS less intrusive than land-based communications? That's a good question. I suspect it is, but if cellular and PCS is the best and least-intrusive form of communication, it doesn't mean that we have to have seamless coverage throughout the Pinelands.

In places where there are few homes, there is no compelling argument for increased coverage. Sure, hikers will be able to dial 911 and have a better chance of getting through, but that's not a compelling argument. The environmental cost is too high to insure that some city slicker who can't find the subway can be rescued from his stupidity by the Pinelands authorities.

In developed areas with roads already built, increased coverage does not seem as objectionable. You've already raped the land by building a road, houses and businesses; what's a few towers going to do to ruin the view? However, towers in the pygmy pines of Woodlands Township and near the Great

Egg Harbor River sound aesthetically nauseating and something you should try
hard to avoid.

The fundamental question - is again, how much of this cellular and PCS do we
need in the Pinelands? If we deny these requests and wait five years, will
technology have advanced so far that these towers are unnecessary and
obsolete? Is it not an act of love for future generations to even show such
foresight?

Sincerely,

Craig S. Farrell
14 Jessica Place
Monmouth Beach, NJ 07750
732-728-1882

From: "Scott" <jcs1997@prodigy.net>
To: <planning@njpines.state.nj.us>
Subject: Wireless towers-NO
Date: Fri, 19 Nov 1999 07:11:56 -0500
Organization: Prodigy Internet
X-MSMail-Priority: Normal
X-Mailer: Microsoft Outlook Express 5.00.2314.1300
X-Mimeole: Produced By Microsoft MimeOLE V5.00.2314.1300

Sirs,

The proposal to increase both the number and size of wireless cell towers in the Pinelands should be closely examined, and summarily rejected. While there may be some reason to add or increase the size of towers in 1 or 2 of the cases on the outer fringe areas adjacent to roads any additions should be aesthetically harmonious with the area. The overall proposal to add this many towers over the next year is absurd.

Adding huge towers in the middle of a pygmy pine forest? Come on. No way, right?

Better to stop this now. Tower technology is developing quickly, and 5 years from now smaller and better disguised towers will be the norm. There is no over ruling public need for additional towers now, and the proposal clearly is meant to enrich associated corporate interests at the expense of the public in general.

I hope these comments help make the proper decision.

James C Scott
2 Judith Court
Ocean Township, NJ 07712
732-517-8815

Attachment Converted: "c:\eudora\attach\Wireless.htm"

Sirs, The proposal to increase both the number and size of wireless cell towers in the Pinelands should be closely examined, and summarily rejected. While there may be some reason to add or increase the size of towers in 1 or 2 of the cases on the outer fringe areas adjacent to roads any additions should be aesthetically harmonious with the area. The overall proposal to add this many towers over the next year is absurd. Adding huge towers in the middle of a pygmy pine forest? Come on. No way, right? Better to stop this now. Tower technology is developing quickly, and 5 years from now smaller and better disguised towers will be the norm. There is no over ruling public need for additional towers now, and the proposal clearly is meant to enrich associated corporate interests at the expense of the public in general. I hope these comments help make the proper decision. James C Scott2 Judith CourtOcean Township, NJ 07712732-517-8815

X-Sender: dhb@mail.buckleydelcano.com
To: planning@njpines.state.nj.us
From: David Hays Buckley <dhb@buckleydelcano.com>
Subject: No new towers in the Pinelands!
Cc: dschvejda@igc.org, David Hays Buckley
<dhb@buckleydelcano.com>
Date: Fri, 19 Nov 1999 08:55:30 -0500

To the Guardians of The Pines:

I believe that it is your mission to guard the Pine Barrens from human
encroachment so that they may be maintained as the New Jersey, national and
world treasure that they are.

I strongly oppose the construction and or expansion of "cellular" or "PCS"
or any other kind of tower that impinges on the natural beauty of this
magnificent area.

Please maintain your vigilance and have as your overriding concern the
preservation of the remaining pristine wilderness that we have in this, the
most developed and densely populated of our United States.

Sincerely,

David Hays Buckley
90 Jefferson Avenue
Maplewood, New Jersey 07040-1231
973 275 1056

Date: Fri, 19 Nov 1999 07:46:11 -0500 (EST)
From: Jakob Franke <jf31@columbia.edu>
Sender: jf31@columbia.edu
To: planning@njpines.state.nj.us
Subject: pineland towers

Please don't rush through the permit for more towers in the pinelands.
It's a unique area, and there should be absolutely no alternatives before
consideration is given to this proposal.
Not enough time and notification has been provided to properly address the
issues.
Don't issue the permits yet!

Sincerely,

Jakob Franke
424 Tappan Road
Northvale, NJ 07647

Tel. 201-768-3612

From: Italia88@aol.com
Date: Fri, 19 Nov 1999 08:03:17 EST
Subject: Cell Towers in Pinelands
To: planning@njpines.state.nj.us
X-Mailer: AOL 4.0 for Windows 95 sub 10

It's time to stop destroying our beautiful natural resources. I recently heard that cell towers are proposed for the Pygmy Forest in the Pine Barrens. With the trees only topping 10 feet, how can we put up those ugly towers? I know technology has it's place in today's society, but there has to be a limit on what we take away from our future. Preserving our natural habitats and resources should be something we stand up for as a state. Too many of our farm lands, forests and shore lines are being torn up for housing developments and progress. The Pine Barrens is the biggest untouched acreage left in NJ. Let's not destroy any small piece of that.

SAY NO TO CELL TOWERS!

Thank you,
Gay A. Raab
2467 Route 10 East
Bl. 31-4A
Morris Plains, NJ 07950
Italia88@aol.com

P.S. Yes, I am a cell phone user. I also work for the state's largest telecommunications company.

From: Berbaumw@aol.com
Date: Fri, 19 Nov 1999 08:23:26 EST
Subject: No Cell Towers
To: planning@njpines.state.nj.us
X-Mailer: Windows AOL sub 45

To: planning@njpines.state.nj.us

No more cell towers in the NJ Pines.

NO TOWERS - NO WAY

William R. Berbaum
41 Watchung Plaza, Suite 381
Montclair, NJ 07042-4117

From: "Fran Duggan" <fduggan@worldwidedreams.com>
Organization: RGA Accessories, Inc.
To: planning@njpines.state.nj.us
Date: Fri, 19 Nov 1999 08:33:39 -0500
Subject: PCS towers
Priority: normal
X-mailer: Pegasus Mail for Win32 (v3.01d)

The PCS tower proposal (Comprehensive Plan for PCS Facilities in the
Pinelands Area) is outrageous! Please do not approve this plan!
Frances Duggan
102 Ilford Avenue
North Arlington, NJ 07031

X-Sender: dhb@mail.buckleydelcano.com
To: planning@njpines.state.nj.us
From: David Hays Buckley <dhb@buckleydelcano.com>
Subject: No new towers in the Pinelands!
Cc: dschvejda@igc.org, David Hays Buckley
<dhb@buckleydelcano.com>
Date: Fri, 19 Nov 1999 08:55:30 -0500

To the Guardians of The Pines:

I believe that it is your mission to guard the Pine Barrens from human
encroachment so that they may be maintained as the New Jersey, national and
world treasure that they are.

I strongly oppose the construction and or expansion of "cellular" or "PCS"
or any other kind of tower that impinges on the natural beauty of this
magnificent area.

Please maintain your vigilance and have as your overriding concern the
preservation of the remaining pristine wilderness that we have in this, the
most developed and densely populated of our United States.

Sincerely,

David Hays Buckley
90 Jefferson Avenue
Maplewood, New Jersey 07040-1231
973 275 1056

From: csolomon@ets.org
X-Incognito-SN: 283
Date: Fri, 19 Nov 1999 09:01:44 -0500 (EST)
Subject: Opposed to cell towers in the pinelands
To: planning@njpines.state.nj.us
Reply-to: csolomon@ets.org
X-Incognito-Version: 5.0.1.89

I am writing to express my opposition to the positioning of communications
in the PInelands. This is outrageous, especially in view of the fact that
the communciatons comapany "need" towers of such height in order to sell
"vertical real estate." Please deny these requests. At the very least, the
public comment period should be extended so that members of the community
can be heard.

Date: Fri, 19 Nov 1999 06:30:53 -0800 (PST)
From: Joseph Phillips <joe_phillips@yahoo.com>
Subject: NO TOWERS!
To: planning@njpines.state.nj.us

Hello,

I am writing to express my extreme oppisition to approving the construction of two towers in the Pinelands area. The pines are about the only place left in NJ, perhaps on the entire eastern seaboard where one can finally escape all the development, traffic, sights, and sounds, of the regions sprawling and out of control development. The last thing we need is a dregraded viewshed in the pines. This is a place to go to look up and see the sky without the frame of development, to gaze across miles of undeveloped land and see nothing but nature's work. These towers are not needed. Why should we, the citizens who live and work on this earth give up this area piece by piece to companies who only seek to profit. Please, stop these towers and let the Pinelands live on in as natural a state as possible.

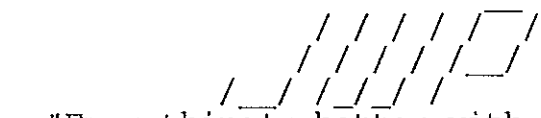
Sincerely,

Joseph W. Phillips
4 Picardy Road
Succasunna, NJ 07876

(973) 584-3282

joe_phillips@yahoo.com

=====



"Everything's better with a banjo"

To: planning@njpines.state.nj.us
Cc: dschvejda@igc.org
Subject: Towers
X-Mailer: Juno 1.49
From: "Tanya G. McCabe" <tanyagm@juno.com>
Date: Fri, 19 Nov 1999 09:34:02 EST

The pine barrens are supposed to be protected!! Please no new towers in
the Pine Barrens!!

Tanya McCabe

---

Date: Fri, 19 Nov 1999 09:56:51 -0500
From: "Loren D. Mendelsohn" <lmend@crow.admin.ccny.cuny.edu>
Organization: City College of New York
X-Mailer: Mozilla 4.7 [en] (WinNT; I)
X-Accept-Language: en,en-GB
To: planning@njpines.state.nj.us
Cc: SierraAct@aol.com
Subject: PCS Towers in the Pinelands

Dear Dr. Brady,

As a New Jersey resident who makes extensive use of our wilderness resources (I am a hiker and a backpacker), I am writing to express my opposition to the building of additional telecommunications towers in the Pinelands wilderness. I have seen such towers in other locations, particularly in northern New Jersey, where mountain top wilderness areas have been destroyed by their placement. This is particularly an issue, since the area where the towers are to placed is a pigmy pine forest, and their presence will not even be partially hidden by the vegetation. The visual impact will be profound, to say nothing of the impact of the construction itself.
It has been my experience that construction projects in wilderness areas leave deep scars which take decades to heal, if they heal at all. Often, in the case of towers such as those currently being contemplated, permanent access roads also need to be constructed to make it possible to service the towers.

Let Sprint and Omnipont find a different, non-wilderness location for their towers.

Sincerely,

Loren D. Mendelsohn
3 Morris Place
Towaco, NJ 07082
(973) 402-1799

X-Sender: boghosia@mail.atlantic.edu (Unverified)
X-Mailer: QUALCOMM Windows Eudora Light Version 3.0.6 (32)
Date: Fri, 19 Nov 1999 10:00:00 -0600
To: planning@njpines.state.nj.us
From: Tom Boghosian <boghosia@atlantic.edu>

Please do not erect the towers. Tom Boghosian 3722 Lehigh Court, Mays
Landing, NJ 08330

From: "Liz" <liz@lifespeed.net>
To: <planning@njpines.state.nj.us>
Subject: Pinelands Towers
Date: Fri, 19 Nov 1999 09:48:55 -0500
X-MSMail-Priority: Normal
X-Mailer: Microsoft Outlook Express 4.72.3110.5
X-MimeOLE: Produced By Microsoft MimeOLE V4.72.3110.3

I am writing to express opposition to new cell towers being built in the Pinelands. Please leave this beautiful area alone.
Liz Marshall
5 Old Orchard Rd.
Hardwick, NJ 07825

Attachment Converted: "c:\eudora\attach\Pineland.htm"

X-Sender: rmcgee@mail.amelar.com
Date: Fri, 19 Nov 1999 10:01:39 -0500
To: planning@njpines.state.nj.us
From: Ron McGee <rmcgee@amelar.com>
Subject: Have You Gone Mad?

Massive towers despoiling the Pinelands, the only natural area of its
kind in the state, just to support cell phone service? That is absolutely asinine! Let's compromise. Install two pay phones at a nearby rest stop instead.

.

Ron McGee
64 Birch Road
Ringwood, NJ 07456

X-Originating-IP: [128.6.53.199]
From: "camille gutmore" <cgutmore@hotmail.com>
To: planning@njpines.state.nj.us
Subject: NO TOWERS IN PINELANDS!!
Date: Fri, 19 Nov 1999 07:13:20 PST

Having just read of the plan to build towers in the Pinelands I need to
express my concern and opinion. This is the beginning of a disaster!! NO NEW
TOWERS; NO WAY!!!

Camille Gutmore
181 River Road
Nutley, NJ 07110
973.667.2203

From: Stu342@aol.com
Date: Fri, 19 Nov 1999 10:18:32 EST
Subject: New towers in the Pinelands
To: planning@njpines.state.nj.us
X-Mailer: AOL 4.0 for Windows 95 sub 38

To whom it may concern:

I am writing to you today to express my concern over the proposal to build 7
new PCS towers in the Pinelands National Reserve. I am especially concerned
that the proposed plan lacks any scientifically demonstrated need for these
new towers. Without proof of need, I do not see how such a plan can be
approved. Please do not allow this proposal to proceed.

Thank you for your attention to this matter.

Andrew S. Ewing
Conservation Chair
Bergen County Chapter, National Audubon Society
490 Vance Ave.
Wyckoff, NJ 07481-1130

X-Server-Uuid: 3789b954-9c4e-11d3-af68-0008c73b0911
From: "Salese, Patricia (IS)" <PSalese@NA2.US.ML.com>
To: "'planning@njpines.state.nj.us'"
<planning@njpines.state.nj.us>
Subject: PCS towers
Date: Fri, 19 Nov 1999 10:25:08 -0500
X-Mailer: Internet Mail Service (5.5.2448.0)
X-WSS-ID: 142BB42C98777-01-01

Patricia Salese
15 Springholm Dr.
Berkeley Heights, NJ
07922
908.464.5581
~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~
Dr. Barry Brady - Pinelands Commission,

This email is in response to the proposed PCS towers in the Pinelands
National Reserve.

I am fervently OPPOSED to this construction. This area is a vital ecological
region. There is NO REASON for these towers to be built here. There is very
little demonstrated need for them.

I do not believe it is fair for the interests of a few to impose on the good
of the public.
The way I see it, Sprint and Ominpoint are taking the easy way out for
themselves by
attempting to build here. If you allow these towers to be built, where will
it stop?
This land was not preserved so that special interest could have an easier
time of it.

Thank you for your attention to this matter.
Sincerely,
Patricia Salese
Sierra Club
Conservation Chair - Loantka group

Patricia Salese
Merrill Lynch & Co.
Infrastructure Solutions ~ Process Management
732.627.8069
PSalese@NA2.US.ML.com
~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~

From: Phil Salkie <phil@howman.com>
Subject: A Vote against the tower plan
To: planning@njpines.state.nj.us
Date: Fri, 19 Nov 1999 11:33:21 -0500 (EST)

Sirs,

I am opposed to the plan in its current form. While I understand that improved cellular coverage is an economic benefit, I feel that there are areas of the state which should be reserved as scenic, undeveloped, and undevelopable, and the pygmy forest certainly counts as one of these. The Great Egg Harbor river area is also an area of great scenic importance, in a federally recognized wild area. I hope that you will deny the permits to erect towers in these sensitive areas, and we will all just have to live with not being able to pick up our e-mail while walking through some of New Jersey's last remaining wild lands.

Thank you,

Philip Salkie
547 West Hill Road
Califon, NJ 07830
908-638-4595

X-Originating-IP: [24.3.15.106]
From: "Lisa Carolina Gonzalez" <lcgpanther@hotmail.com>
To: planning@njpines.state.nj.us
Subject: Re: no more towers
Date: Thu, 25 Nov 1999 16:13:12 PST

ok no problem, my mailing address is 14706 Manor Rd. PHoenix MD 21131

>From: Betsy Piner <planning@njpines.state.nj.us>
>To: "Lisa Carolina Gonzalez" <lcgpanther@hotmail.com>
>Subject: Re: no more towers
>Date: Fri, 19 Nov 1999 12:25:02
>
>Thank you for your comments regarding the PCS plan. Please provide us with
>your mailing address so that we will have a complete record of your
>transmission. Thank You.
>
>At 08:33 AM 11/19/1999 PST, you wrote:
> >hello,
> >my name is lisa and i really want you to not put any towers through the
> >pinelands. i love nature and nature is responsible for everything we
>have.
> >i respect nature and i hope you do to. so if you are thankful for your
>life
> >and the fact that you are able to breath you will not put any new towers
>up
> >that can hurt nature. thankyou
> >
> >_____
> >Get Your Private, Free Email at http://www.hotmail.com
> >
> >
>

_____
Get Your Private, Free Email at http://www.hotmail.com

To: planning@njpines.state.nj.us
Date: Thu, 18 Nov 1999 23:32:14 -0800
Subject: Comments on the proposed new PCS towers in the Pine Lands
X-Mailer: Juno 3.0.13
From: Louis M Lasher <lmlasher@juno.com>

No news towers are needed. Please respect the sanctity of the the Pines
Lands Reserve, and cease consideration
of this senseless further intrusion into a unique ecosystem.

My names is Louis M Lasher and I live at 824 Third Place in Plainfield NJ
07060, and I don't really see why "gaps in coverage" of a handful of PCS
cell phone companies warrants this compromise of the Ecological Reserve.

In fact I must state that the recent trends in policy concerning the
Pinelands seem to be a complete betrayal of the original intension of the
1979 preservation partnership between the state and federal government.
It seems to me that "planning" should not mean being the servant of every
business interest that approaches your offices. Let us make sure our
collective priorities are straight, after all you should be acting in the
best interest of the state, not helping every shady business to pillage
our natural resources.

Thank you for your consideration on this issue, but this issue should
have never been considered at all.

From: ParadoxWRS@aol.com
Date: Fri, 19 Nov 1999 11:45:11 EST
Subject: Pinelands: No New Towers
To: planning@njpines.state.nj.us
X-Mailer: Windows AOL sub 44

Dear Commisioners

I am voter here in New Jersey and I hike in the Pinelands a great deal. I am
strongly opposed to the building of communications towers in the Pinelands.
Please, NO NEW TOWERS!

William R. Schultz
46 B Bartle Court
Highland Park, NJ 08904-2032

X-Originating-IP: [128.6.175.83]
From: "Filomena B" <fillyb@hotmail.com>
To: planning@njpines.state.nj.us
Subject: NO TOWERS
Date: Fri, 19 Nov 1999 11:59:27 PST

Please don't build the towers in the forest or over the Egg Harbor river.
We really don't feel they are necessary. We think the preservation of
wildlife takes priority over the towers. The Pinelands is so important to
New Jersey. It makes me proud to have such a large area of woodlands in my
very own state. Please don't build. If you do, you'll start a trend
because if you can build, why can't others? Soon, there will be no
Pinelands left. PLEASE! You have the power to keep NJ's wilderness intact.
Don't support this development, support the future of our state. I want
to be able to take my children to the woods of NJ someday.
Once again, I urge you...PLEASE DON'T BUILD.

Sincerely,
Filomena Brogna (age 18)
301 West Sylvania Ave
Neptune City, NJ 07753
...but my home at my mom's is right in the Pinelands:
373 Heritage Way
Tuckerton, NJ 08087

From: "Goodnough, Jon (ELS)" <j.goodnough@elsevier.com>
To: "'planning@njpines.state.nj.us'"
<planning@njpines.state.nj.us>
Subject: Additional cell phone towers in the Pinelands
Date: Fri, 19 Nov 1999 13:05:20 -0500
X-Mailer: Internet Mail Service (5.5.2448.0)

No new towers, no way!

Jonathan Goodnough
711 Adams St. #2
Hoboken NJ 07030

Date: Fri, 19 Nov 1999 12:40:21 -0500 (EST)
From: Andrea Zacharias <abz@eden.rutgers.edu>
X-Sender: abz@er3.rutgers.edu
To: planning@njpines.state.nj.us
Subject: No New towers, No Way!

No new towers, No Way!
We have to protect our land... what will be left for the future?

Andrea Zacharias
26226 DPO Way
New Brunswick, NJ 08901
732-373-8191

The world is good-natured to people who are good-natured.

-- William Makepeace Thackeray

From: Wild1872@aol.com
Date: Fri, 19 Nov 1999 15:34:02 EST
Subject: No PCS Towers!
To: planning@njpines.state.nj.us
X-Mailer: Windows AOL sub 54

November 19, 1999

Dear Sirs:

I strongly oppose the building of new PCS towers in the heart of the Pinelands. The Pinelands is the largest tract of open space remaining on the eastern seaboard, and everything possible must be done to keep it pristine. I believe the proposed PCS towers will only contribute to the Pinelands demise. In addition, this plan should be terminated because of the lack of any scientifically demonstrated need for the towers. Therefore, I ask you to vote against big business and for the preservation of the scenic and ecological integrity of the Pinelands.

Sincerely,

Jason Kurtz
55 Morgan Place
North Arlington, NJ 07031

Alternate-recipient: prohibited
Date: Fri, 19 Nov 1999 16:45:58 -0500 (EST)
From: Richard Colby <Dick.Colby@stockton.edu>
Subject: additional communication (telephone) towers in Pinelands
To: planning <planning@njpines.state.nj.us>
Posting-date: Fri, 19 Nov 1999 16:59:00 -0500 (EST)
Importance: normal
Priority: normal
UA-content-id: C130ZYEWOA899
A1-type: MAIL

I'm a Trustee of the Great Egg Harbor Watershed Association, which has been working with the National Park Service office in Philadelphia, for the last 15 years, to bring Wild & Scenic status to the River. Scenic Rivers are federally entitled to a 1/4 mile visual buffer (viewshed), measured inland from the river edge. Before you infringe on that corridor, may I urge that you:

1. Demand a map of existing towers, with the extent of their electronic "ranges" marked to indicate gaps in coverage.

2. Demand a map showing existing tall structures, such as water towers and existing cell phone towers, that could be adapted to mount additional antennas. (E.g. there is a water tower in my town, Egg Harbor City, with two or three different sets of communication antennae mounted to it.)

3. Ask your consultant to prepare an alternate plan for providing coverage, and to estimate the relative costs of the two plans.

THEN you'll have a better basis for evaluating the company applications.

from Dick Colby (Prof. Richard H. Colby), Environmental Studies Program, Richard Stockton College, Pomona NJ 08240-0195. office phone 609 - 652-4355.

Date: Fri, 19 Nov 1999 17:52:51 -0500
From: Bob Galanty <mago@erols.com>
Reply-To: mago@erols.com
Organization: Magnum Opus Engineering
X-Mailer: Mozilla 4.04 [en] (Win95; I)
To: planning@njpines.state.nj.us, dshvejda@igc.org, techie@monmouth.com
Subject: cell towers

11-19-99

Robert Galanty
284 Kennedy St
Iselin , N J 08830

732-283-4925

Dear Sir or Madam:

In reference to cell towers in the Pinelands , I feel it is totally inappropriate. The US government helped set aside these lands for the enjoyment , multi benefits and future of the people of New Jersey.It was never intended for these lands to be commercially developed by profit making organizations. The clincher here is PROFIT MAKING ORGANIZATION.
Legally this term mandates NOT INHERENTLY BENEFICIAL, which is the point you missed in order to place these towers on public land.
The 1996 Telecommunications Act prohibits preemption, Please locate these towers elsewhere.

Thank You,

Robert Galanty

From: "BobP" <bobp@k2nesoft.com>
To: <planning@njpines.state.nj.us>
Subject: no new towers
Date: Fri, 19 Nov 1999 20:29:46 -0500
X-MSMail-Priority: Normal
X-Mailer: Microsoft Outlook Express 5.00.2314.1300
X-MimeOLE: Produced By Microsoft MimeOLE V5.00.2314.1300

please dont put any new cell towers in the pinelands.

it will ruin the pinelands

thank you

bob praetorius
39 dennis ct
hightstown nj 08520

Attachment Converted: "c:\eudora\attach\nonewtow.htm"

From: pbx@cybercomm.net
Date: Fri, 19 Nov 1999 20:37:55 -0500
X-Mailer: Mozilla 4.61 [en] (Win95; U)
X-Accept-Language: en
To: planning@njpines.state.nj.us
CC: ppa <ppa@pinelandsalliance.org>
Subject: No new towers!

None!, especially in the pygmy pines in Woodland Township. What can you
possibly be thinking of? This is as bad as the Tabernacle school and the
Lacey township cemetary.

You are eating away at the pines.....it has to stop!

Bob Moyer
2424 Phillips Road
Forked River, NJ

From: HCarola@aol.com
Date: Fri, 19 Nov 1999 22:47:31 EST
Subject: NO CELL/PCS TOWERS IN THE PINELANDS!
To: planning@njpines.state.nj.us
X-Mailer: AOL 4.0 for Windows 95 sub 9

To: The Pinelands Commission

From: Hugh Carola
30 Maple Ave.
Hackensack, NJ 07601
201-457-1582

Re: Proposal to allow construction of additional cell/PCS towers in Pinelands

Dear Commissioners:

I read today with disgust of this most recent attack on the integrity of the Pinelands (which belongs to ALL New Jerseyans - not the developers, not the cranberry growers and not even the Commission.) in the form of this fast-tracked plan to allow the construction of more than 20 communications towers throughout the region.

I am therefore registering my opposition to the plan and to the way the Commission has begun to rubber-stamp virtually all development plans that now come before it. You work for the people of New Jersey, not the monied interests in South Jersey.

And for the record, I am a SPRINT PCS customer. (201-362-3428)

Sincerely,

Hugh M. Carola

From: JoisyGuy@aol.com
Date: Fri, 19 Nov 1999 23:31:52 EST
Subject: Cellular phone towers
To: planning@njpines.state.nj.us
X-Mailer: Windows AOL sub 45

As a former resident and still frequent visitor to New Jersey, I oppose the
building of new cellular towers, or increasing the height of old ones, in the
Pinelands.

Paul Schickler
901 Ave. H, Apt. 1E
Brooklyn, NY 11230

November 19, 1999

Kerry Miller
549 Winsor Street
Bound Brook, NJ 08805

Pinelands Commission
Springfield Road
New Lisbon, NJ 08064
FAX (609) 894-7331

Dear Commissioners:

I am writing to comment on the issue of cell towers in the Pinelands. As I understand it, Sprint and PCS are seeking authorization to build seven more towers within the Pinelands. They claim that there are "gaps" in cellular/pager service in some areas of the Pinelands, yet they have failed to provide documentation on the location or extent of these gaps. In addition, some of the proposed towers would be inappropriately high, up to 200 feet, for the scenic, undisturbed areas in which they are proposed.

I understand that the Commission cannot deny tower applications in an across-the-board manner. However, the Commission can, and should **demand scientific documentation of need** (the alleged gaps, *and* the future market needs for the technology in question) before capitulating on this issue. The Preservation Area is rural; small gaps do not justify major additional tower intrusions into the landscape. And any new towers should be limited to the regulated growth areas, not sited in the pygmy pines, on the Forked River, or in the Preservation Area.

It seems that Sprint and PCS may be seeking approvals based more on their desire to position themselves well for future competition than on a substantial, current need for increased service. Under no circumstances should towers be allowed for speculative purposes.

I hope that the Pinelands Commission will not be afraid to stand its ground against corporate pressure. As you all know, the Pinelands are one of a kind; the public depends on you to protect this natural treasure and its viewscape for future generations.

Sincerely,

Kerry Miller

Kerry Miller

Date: Mon, 22 Nov 1999 16:08:48 -0800 (PST)
From: Pat G Palmer <patpalmer@yahoo.com>
Reply-To: pat@harbormist.com
Subject: Re: i'm against more towers in pygmy forest areas of the pinelands
To: Betsy Piner <planning@njpines.state.nj.us>

Pat G. Palmer
165 N Harrison St
Princeton, NJ 08540

--- Betsy Piner <planning@njpines.state.nj.us> wrote:
> Thank you for your comments regarding the PCS plan.
> In order for us to
> have a complete record of your submission, would you
> kindly send us your
> complete mailing address. Thank you.
>
> At 05:18 AM 11/20/1999 -0500, you wrote:
> >I'm against more towers in pygmy forest areas of
> the pinelands. The
> >one that is there is an eyesore. Although I love
> my cell phone, I can
> >do without it while in specially preserved areas.
> >
> >Please speak out against this further destruction
> of a formerly wild
> >area.
> >
> >Regards,
> >
> >Pat Palmer
> >Princeton, NJ
> >
> >--
> >
> >http://www.harbormist.com/pat/
> >mailto:pat@harbormist.com
> >
> >
> >
> >
>
>
>

From: StRalph@aol.com
Date: Sat, 20 Nov 1999 06:57:24 EST
Subject: towers in the pinelands
To: planning@njpines.state.nj.us
X-Mailer: AOL 3.0 for Windows 95 sub 49

No new towers . No way.

Edith Biondi
520 Haworth Ave.
Haworth,N.J, 07641

Date: Sat, 20 Nov 1999 08:08:27 -0500
From: Loretta Dunne <ledunne@erols.com>
X-Mailer: Mozilla 4.6 [en] (Win98; I)
X-Accept-Language: en
To: planning@njpines.state.nj.us
Subject: Proposed Cell Phone Towers

To the members of the Pineland Commission:
I am strongly opposed to building any more cell phone towers in the Pinelands. I am already concerned about those that were erected and I believe that no more should be put up. The Pinelands is a special, protected area and should be treated as such. To make exceptions for type time of industry is not the way to protect this environement.
Please reject this plan.

Thank you,
Loretta Dunne
125 North Drexel Street
Woodbury, NJ 08096

Date: Sat, 20 Nov 1999 08:34:52 +0000
From: Mike Brown <eyebrown@snip.net>
Reply-To: eyebrown@snip.net
X-Mailer: Mozilla 3.01-C-MACOS8 (Macintosh; I; PPC)
To: planning@njpines.state.nj.us
Subject: New Towers?

From:
Michael S. Brown
159 Carlisle Rd.
Audubon,N.J. 08106-1209

I am writing this letter to voice my concern over new PCS Towers in the Pinelands. If there is a need for new towers, I can reluctantly understand that. However any tower in the midst of the pygmy pines seems an injustice. Of all of the treasures in the Pinelands, the pygmy pines are unique and truly awe inspiring. I would hope the spirit of the management plan would take into account the breathtaking scene of standing in the middle of fully mature trees only 10 feet tall. A tower of any size would seem to say that the protection of this forest is not warranted. I am not in favor of any new towers; but especially not in the pygmy pines. I really hope that true preservation will be considered important in this matter.

Michael S. Brown

Date: Sat, 20 Nov 1999 21:13:27 -0500
From: Brian Bragg <bbragg@home.com>
Organization: @Home Network
X-Mailer: Mozilla 4.5 [en]C-AtHome0405 (Win98; U)
X-Accept-Language: en
To: planning@njpines.state.nj.us
Subject: PCS Facilities

I strongly oppose the proposed amendments to permit the installation of new PCS facilities in the Pine Barrens. These towers will significantly interfere with this ecological region and mar its beauty. The Pine Barrens area has unique value in our State, much of which has already been overdeveloped. We should be exceedingly cautious of proposals that impair or destroy the unique, unspoiled qualities that the Pine Barrens offer. There has been no showing of compelling need for these towers, and the proposed amendments should be rejected.

Brian E. Bragg
110 Passaic Avenue
Summit, NJ 07901

Date: Sun, 21 Nov 1999 10:10:20 -0400
From: Ellen Friedman <efrie@rcn.com>
Reply-To: efrie@rcn.com
X-Mailer: Mozilla 4.5 (Macintosh; I; PPC)
X-Accept-Language: en
To: planning@njpines.state.nj.us
Subject: New cell phone towers

I am outraged that new cell phone towers are proposed for placement in the pinelands. This wonderful wilderness in the heart of such a heavily populated state will be further marred by these towers.

Ellen Friedman
524 Main St.
Lodi, NJ

07644

**Rwyzaz@aol.com, 09:37 PM 11/21/19, towers**

From: Rwyzaz@aol.com
Date: Sun, 21 Nov 1999 21:37:49 EST
Subject: towers
To: planning@njpines.state.nj.us
X-Mailer: AOL for Macintosh sub 54

Enough is enough. The people of NJ are not ALL interested in a free for all take what you can get and run approach. The developers and commercial interests are. But do we always have to sell out our birthright for cold cash today without a serious thought about tomorrow. This project is proposed so that more fools can talk on their phones while walking down the street, saying nothing that wont wait until they get home or to the office. Try sitting in a train to Washington or Baltimore while six conversations go on continuously around you. Worse yet the plague of people driving and talking at the same time. Shouldn't there be some limit!! The easier you make it the more they will use it. Some countries have successfully slowed and discouraged the rape of the woods, farmlands and open lands by NOT building superhighways. Maybe the lesson could be applied to traffic control on the talk superhighway. Stop the excess towers. Enough is enough!

**Rwyzaz@aol.com, 04:54 PM 11/22/19, Re: towers**

From: Rwyzaz@aol.com
Date: Mon, 22 Nov 1999 16:54:42 EST
Subject: Re: towers
To: planning@njpines.state.nj.us
X-Mailer: AOL for Macintosh sub 54

Richard Goldsmith
115 Vanderveer Avenue
Somerville, NJ 08876

From: MFGhome2@aol.com
Date: Sun, 21 Nov 1999 22:11:00 EST
Subject: Proposed PCS Plan
To: planning@njpines.state.nj.us
X-Mailer: Windows AOL sub 45

Nov. 21, 1999

The following are comments regarding the proposed plan for PCS providers in the Pinelands. These comments reflect the position of the New Jersey Chapter of the Sierra Club.

The first comment has to do with the undemocratic procedure the Pinelands Commission has followed in allowing such a short period of time for the public to review technical analysis that the Commission has developed. To allow the public only a few days severely limits the ability of the concerned public to make reasonable comments. The public comment period should be extended regarding this very sensitive issue.

Approving this plan would severely undermine the previous "comprehensive" plan that was approved. It seemed the whole point was to avoid piecemeal, redundant towers that would severely affect the scenic resources of the Pines. And now we have a plan for even more towers with a total lack of evidence as to the necessity of the towers. Why can't "adequate service" be spelled out clearly? If this were done it would seem rather straightforward to determine the need and placement for new towers. Also, to place a tower smack in the middle of the West Plains seems laughable if it weren't actually being proposed. Such a symbolic and real affront to the aesthetics of the landscape the Commission is charged to protect should be met with the stiffest resistance. That this placement is actually in the plan suggests the Commission is bending over backwards to please a powerful interest without any justification of the need for such a tower.

**MFGhome2@aol.com, 10:11 PM 11/21/19, Proposed PCS Plan**

The proposed plan does not meet CMP standards, does not involve all
providers, and does a very poor job of justifying the number and placement of
these towers. The NJ Chapter of the Sierra Club strongly urges the Commission
to reject this plan and make the process more democratic.

Michael Gallaway
Pinelands Coordinator
NJ Chapter of the Sierra Club

**MFGhome2@aol.com, 11:28 PM 11/23/19, Re: Proposed PCS Plan**

From: MFGhome2@aol.com
Date: Tue, 23 Nov 1999 23:28:07 EST
Subject: Re: Proposed PCS Plan
To: planning@njpines.state.nj.us
X-Mailer: Windows AOL sub 45

Dear Folks,

Regarding my previously submitted comments, my mailing address is 36 West
Lake Rd., Medford NJ 08055. Thank you. Michael Gallaway

From: YNOKE@aol.com
Date: Sun, 21 Nov 1999 22:49:13 EST
Subject: Cell Towers in the Pines
To: planning@njpines.state.nj.us
X-Mailer: Windows AOL sub 45

It seems strange that so much effort is put into preserving the beautiful
and unique natural areas in this wonderful state of ours and then we proceed
to despoil it a few feet at a time. We have to see NO to the shopping
centers, senior citizen developments , creeping urban sprawl and now the Unsi
ghtly Cell Towers.....
The very last thing that NJ citizens want to see as they view the Pygmy Pine
Forest is an ugly steel tower.....Does every inch of the Pine Barrens
have to have complete Wireless Coverage ?????
And this is not the sentiments of just another Tree-hugger.... I'm an
invester with holdings in numerous Telecommunication Corporations and
Wireless Enterprises.

We have to say an emphatic NO to any new cell towers in the Pines. Enough
is enough...I'll just have to drive another five miles to call the office, SO
WHAT !

With Stately Devotion, Bob Jonas

756 Crescent
Pkwy

Westfield, NJ
07090-2304

908-232-7059

ynoke@aol.com

Priority: Normal
X-MSMail-Priority: Normal
To: planning@njpines.state.nj.us
From: "Matt Visco" <MATTVISCO@prodigy.net>
Subject: Oppose towers in Pinelands
Date: Mon, 22 Nov 99 01:08:28 PST

November 22, 1999

I am writing to you in strong opposition to the construction of radio, celluar or other such towers in the Pinelands of New Jersey.

Sincerely,

Matthew L. Visco
25 Colts Neck Terrace
Yardville, NJ 08620

From: cal@nis.net
X-Sender: cal@pop.nis.net
X-Mailer: Windows Eudora Pro Version 2.2 (32)
Date: Mon, 22 Nov 1999 05:30:40 -0500
To: planning@njpines.state.nj.us
Subject: Towers in the Pinelands

Please STOP any new towers in the Pinelands! NO new towers, please!!

Virginia Calder
64 Academy Circle
Oakland, NJ 07436

cal@nis.net

From: "Weckesser, Peter M, CSCIO" <pweckess@att.com>
To: "'planning@njpines.state.nj.us'"
<planning@njpines.state.nj.us>
Subject: Pineland Towers?
Date: Mon, 22 Nov 1999 08:26:45 -0500
X-Mailer: Internet Mail Service (5.5.2448.0)

NO new Towers for the pinelands.

Peter Weckesser
228 Hidden Woods Ct.
Piscataway, NJ 08854

Reply-To: "John Emerich" <Johnre@worldnet.att.net>
From: "John Emerich" <Johnre@worldnet.att.net>
To: "Betsy Piner" <planning@njpines.state.nj.us>
Subject: Re: Towers
Date: Mon, 22 Nov 1999 12:48:07 -0500
X-MSMail-Priority: Normal
X-Mailer: Microsoft Outlook Express 5.00.2014.211
X-MimeOLE: Produced By Microsoft MimeOLE V5.00.2014.211

Sure:

John Emerich
24 Altamont Rd.
Edison, N.J. 08817

----- Original Message -----
From: Betsy Piner <planning@njpines.state.nj.us>
To: John Emerich <Johnre@worldnet.att.net>
Sent: Monday, November 22, 1999 11:06 AM
Subject: Re: Towers

Thank you for your comments regarding the PCS plan. Would you kindly send
us your mailing address so that we might have a complete record of your
submission. Thank you.

At 09:09 AM 11/22/1999 -0500, you wrote:
>Enough with all the towers in these sensitive beautiful areas. These are
>private companies in search of a profit, let them find it somewhere else.
>
>
>

Date: Mon, 22 Nov 1999 13:39:32 -0500 (EST)
From: David Korfhage <korfhage@phoenix.Princeton.EDU>
To: Betsy Piner <planning@njpines.state.nj.us>
Subject: Re: towers

Certainly:

David Korfhage
19 Heritage Blvd.
Princeton, NJ 08540

On Mon, 22 Nov 1999, Betsy Piner wrote:

> Thank you for your comments regarding the PCS plan. Would you kindly send
> us your mailing address so that we might have a complete record of your
> submission. Thank you.
>
>
> At 09:33 AM 11/22/1999 -0500, you wrote:
> >I was recently informed that the Pinelands Commission is considering
> >approving a plan to build a number of cell phone towers in the Pinelands.
> >I would like to express my grave reservations regarding this plan. Wild
> >lands are rare enough in New Jersey that the Commission should make an
> >effort to preserve, with minimal human impact, one of the largest areas of
> >open space in New Jersey. To see a tower while paddling down an allegedly
> >"wild and scenic river" would certainly take away from both the wildness
> >and the scenic-ness of the experience. And as for disguising towers (to
> >say nothing of the possibility of "disguising" a tower in a pygmy forest),
> >"disguised" towers are never quite as disguised as I would like--I want my
> >forests to have trees.
> >
> >I hope the Commission will reconsider its planned approval of the towers.
> >
> >David
> >
> >
> >

From: GEORGEWAZZ@aol.com
Date: Mon, 22 Nov 1999 09:41:14 EST
Subject: Re: No towers in the Pinelands!
To: planning@njpines.state.nj.us
X-Mailer: AOL 4.0 for Windows 95 sub 229

My mailing address is:
David Wasmuth
651 Riverside Ave. C-40
Lyndhurst, NJ 07071

Please don't approve communication towers in the Pinelands!

Reply-To: "Barbara Reisman" <breisman@worldnet.att.net>
From: "Barbara Reisman" <breisman@worldnet.att.net>
To: <planning@njpines.state.nj.us>
Subject: NO NEW CELL PHONE TOWERS IN THE PINELANDS
Date: Mon, 22 Nov 1999 10:16:16 -0500
X-MSMail-Priority: Normal
X-Mailer: Microsoft Outlook Express 4.72.3110.1
X-MimeOLE: Produced By Microsoft MimeOLE V4.72.3110.3

To the Pinelands Commission:

Please do not allow additional cell phone towers to be build in the PInelands. These will be an intrusion into the Pinelands and will violate the preservation and protection of this valuable New Jersey resource.

Barbara Reisman
69 Essex Avenue
Montclair, NJ 07042

Attachment Converted: "c:\eudora\attach\NONEWCEL.htm"

**Janet Pierce**

**From:** <Chcboy@aol.com>
**To:** <info@njpines.state.nj.us>
**Sent:** Monday, November 22, 1999 11:16 AM
**Subject:** pcs tower plan

Dear Sirs:

I have lived in the Pinelands area for 20 years. I see absolutely no problem with locating cell/pcs towers in any area of the Pinelands. They are clean and will cause no environmental problems to the land or wildlife. We need these towers and common sense should rule. Also, they provide an additional benefit of creating fire roads to help during a forest fire.

If you are concerned with the looks of a tower, I would suggest that they be made to look like tree's as I've seen in parts of Pennsylvania.

I am a proponent of the Pineland Commission, but the commission has lost its common sense over the years. They are so used to saying no to everything that comes across their desk, that I can understand Governor Whitman trying to put other people on the board. There is a saying that "Absolute power will absolutely corrupt"

Robert P. Jusko
2114 W. Lacey Rd.
Forked River, NJ 08731

Date: Mon, 22 Nov 1999 11:30:43 -0500 (EST)
From: Laurel Kornfeld <laurel2000@mail.com>
To: planning@njpines.state.nj.us
Subject: No New Towers In the Pinelands
X-Mailer: mail.com
X-Originating-IP: 198.138.33.199

I am writing to express my strong opposition to any new cellular towers in the Pinelands. These will destroy the character of this unique landscape and have no place there. As a local N.J. environmental official (member, Highland Park Environmental Commission), I am concerned about environmentally sane policies all over N.J. and support a bottom line of conservation and protection of all our natural resources.

Sincerely,
Laurel Kornfeld
106 North Sixth Avenue
Highland Park, N.J. 08904

NJ ENVIRONMENTAL FEDERATION

*Winner of the NJ Governor's Award for Outstanding Achievement in Pollution Prevention*

## COMMENTS FROM THE NEW JERSEY ENVIRONMENTAL FEDERATION RE : COMPREHENSIVE PLAN FOR PCS COMMUNICATIONS FACILITIES IN THE PINELANDS

November 22, 1999

The New Jersey Environmental Federation(NJEF) offers the following comments on the proposed PCS facilities plan in hopes that the Pinelands Commission will reject the plan in its current form and extend the comment period for further review.

### Process

the Commission has allowed less than three weeks for the public to analyze and comment on this Plan. The comment period closes by Nov. 21, just 18 days from when the public was noticed of the public hearing and availablilitly for public review on November 3rd. This leaves the public with the impression that the Commission is rushing this plan through .under pressure from the PCS providers.

NJEF requests an extension of the comment period of thirty days so that more thorough review of the plan can occur, including review of the staff analysis of the plan. The thirty day clock should begin ticking only when the internal staff review and analysis has been made available to the public.

### The Proposed Plan fails to meet CMP Standards

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 PCS 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. Not all the proposed additional new towers appear to be necessary, as is evidenced by tower #28 that is proposed "if needed" . Because the plan does not include any demonstration of compliance with the CMP's specific requirements, NJEF urges the the Commission to reject the plan.

The plan as submitted lacks the supporting detail and rationale which would warrant approval. NJEF urges its rejection, for approval would signal other prospective providers that the Pinelands Commission is not consistent in enforcing its requirements, particularly when "want" gets confused with "need".

NJEF finds it especially troubling that this plan proposes six new towers, one of them in the most sensitive Plains area, based on the request of two provide, Sprint and Omnipoint. How many times are more towers going to be added on when subsequent providers decide they have an interest in providing service in the area?

Jane Nogaki
Board of Trustees

CLEAN WATER ACTION 25TH ANNIVERSARY Our Water, Our Health, Our Future

*New Jersey Chapter of Clean Water Action, Washington, D.C.*

**State Office** ❑
902 Main Street, Suite 104
Belmar, NJ 07719
(732) 280-8988
Fax: (732) 280-0371

**Legislative Office** ❑
1 Lower Ferry Road
Trenton, NJ 08628
(609) 530-1515
Fax: (609) 530-1508

**South Jersey Office** ❑
223 Park Avenue
Atco, NJ 08004
(609) 767-1110
Fax: (609) 768-6662

**National Office** ❑
4455 Connecticut Ave., NW, Suite A300
Washington, DC 20008
(202) 895-0420
Fax: (202) 895-0438

X-Server-Uuid: 00bfa4b8-ccde-11d2-bd4a-0008c7cf9821
Conversion: Allowed
Original-Encoded-Information-Types: IA5-Text
Priority: urgent
Disclose-Recipients: Prohibited
Alternate-Recipient: Allowed
Importance: high
Date: 22 Nov 1999 09:58:09 -0700
From: "Michael J Herson" <Michael.J.Herson@amexpub.com>
To: "planning%njpines.state.nj.us."
<planning@njpines.state.nj.us>
Subject: Comments regarding cell towers in the Pinelands.
X-WSS-ID: 1427A9E5120125-40-03

planning@njpines.state.nj.us.

Comments regarding cell towers in the Pinelands.
Please forward these comments to the appropriate parties. Thank you.

To whom it may concern:

I am adamantly opposed to despoiling the scenic viewshed of the Pinelands with
communication towers.
The tower proposal would significantly diminish the serenity and beauty of the
area.

As a Pinelands visitor, I feel that the Pinelands should be a place to get
away from it all and get in touch with nature. I leave my laptop at home.
These towers would benefit only a small minority of compulsive cell phone
users who have to use their cellphones wherever they go. These are the same
people who talk incessantly on their cell phone while in the movies and the
theater, the dentist's waiting room and the supermarket and while at the
beach.

Why should everyone else have to suffer by having the view of the forest
compromised by manmade objects.

The towers are unnecessary. There are alternatives. If these cell phone
junkies and real estate developers need to communicate so badly,

they can
purchase a satellite phone system such as the Iridium.

I am also opposed to camouflaging these towers to make them look like Pine
Trees. Although this is sometimes a viable alternative in a more populous
area, the height of these towers would make these fake trees seem totally out
of place.

It is time for a backlash against these towers. These towers are jarring and
ugly enough in our suburban environment. . The Pinelands should be kept in the
most natural state possible. We should value the scenic beauty of our parks
and wilderness areas. Otherwise in a few years we could end up with cell
towers on the lip of the Grand Canyon and the top of Mount Rushmore.

Lets impose a moratorium on these towers. It is possible that in a few years,
technology will progress to the point where the tall towers will no longer be
necessary. Let's wait for that day.

Let's keep our open space open.

Thank you.

Michael J. Herson
451 Hasbrouck Blvd.
Oradell, NJ 07649
h (201) 262-9472
w (212) 827-6464

Reply-To: "Stephen Knowlton" <knowlton@worldnet.att.net>
From: "Stephen Knowlton" <knowlton@worldnet.att.net>
To: <planning@njpines.state.nj.us>
Subject: PCS towers
Date: Mon, 22 Nov 1999 12:47:53 -0500
X-MSMail-Priority: Normal
X-Mailer: Microsoft Outlook Express 5.00.2014.211
X-MimeOLE: Produced By Microsoft MimeOLE V5.00.2014.211

Dear Pinelands Commission:

I understand that SprintPCS and Omnipoint, two companies that provide Personal Communications Systems, are seeking approval from the Pinelands Commission to build seven additional towers in the Pinelands.

I urge you to disapprove this proposal or make significant changes in the plans. These towers will require new access roads and will severely impact on the wilderness appearance in the Pinelands, particularly in the pygmy pines area.

You could also restrict the installations to existing sites or require that the technology be improved to the range of the transmitters is increased.

Sincerely,

Stephen R. Knowlton
77 Church St.
Fair Haven, NJ 07704
732-747-7011

Attachment Converted: "c:\eudora\attach\PCStowe1.htm"

From: "Sziber, Patricia" <psziber@molbio.Princeton.EDU>
To: "'planning@njpines.state.nj.us'"
<planning@njpines.state.nj.us>
Subject: Communications Towers
Date: Mon, 22 Nov 1999 14:49:36 -0500
X-Mailer: Internet Mail Service (5.5.2448.0)

To the Commission:

I am horrified to learn of plans by two wireless communications purveyors to erect seven new PCS towers in the Pinelands. It is even more outrageous that these plans have been put on a fast track by the Commission. May I remind you that you are charged with protection of New Jersey's most unique and fragile natural treasure, not with facilitating the construction of 200-foot towers within an ecosystem of global significance. There is no paint nor modification in the world that will make these structures blend into the pygmy forest or any other part of the Pinelands. The viewshed would be destroyed in any case.

I protest this plan and the way it is being fast-tracked and I insist there be no new towers in the Pinelands.

Patricia Sziber
19 Wildwood Way
Titusville, NJ 08560

DEBRA MINTER
101 BOARDWALK # 901
ATLANTIC CITY, N.J. 08401
609-572-1057
debraminter@hotmail.com

Mr. Bill Harrison
New Jersey Pinelands Commission
Box 7
New Lisbon, N.J. 08064

November 22, 1999

Dear Mr. Harrison:

This letter is to express my outrage regarding the very recently proposed plan by Sprint PCS and Omnipoint to build seven additional towers in the Pinelands. I am further outraged by the apparent railroading of this plan by the N.J. Pinelands Commission.

The preservation and protection of our unique Pinelands is of the utmost importance for ourselves, and future generations of human beings and wildlife who enjoy the experience and uniqueness of the Pinelands. Besides destroying the aesthetic experience of the Pinelands, the towers interfere with the migratory pattern of birds, causing suffering and death amongst the wildlife population.

The question of preserving and protecting this unparalleled nature is an extremely important issue and clearly additional time is needed to debate the consequences of building additional 200 feet towers. Ample time for public opinion has certainly not been given to such a critical issue. I only learned of this new proposal after reading an article in the November 18, 1999 Atlantic City Press. What is the rush to push this plan through for approval? I urge the Commission to reconsider your deadline for public opinion and expand the deadline so you may hear from the public. This critical matter concerns not only New Jersey residents, but anyone who visits our fine state to experience the Pinelands.

Towers of 200 feet are certainly not in harmony with the pristine nature experience of the Pinelands. Especially in the pygmy pine forests. In the November 1, 1999 the Atlantic City Press ran a delightful article regarding the best places in South Jersey to see the autumn colors. A map showed the nearby areas to visit and enjoy the exquisite autumn sites. I have visited most of these areas and so enjoyed seeing the natural beauty of our state. Sadly, so very sadly, an extremely similar map published on November 18, 1999 showed those same locations where the PCS towers would be built, thus spoiling the best places to see the autumn foliage.

My question to you and the N.J. Pinelands Commission is simple. What are your priorities for the Pinelands? To protect and preserve the unique beauty and balance of nature the New Jersey Pinelands offers all of us, or to assist PCS and Omnipoint in financial gain at the tragic loss of nature?

In this time of Thanksgiving I give thanks for the opportunity to experience the natural beauty of New Jersey. I urge you and the Commission to continue to preserve and protect the New Jersey Pinelands. Thank you.

Sincerely,

Debra Minter

cc: Governor Christine Whitman

Date: Mon, 22 Nov 1999 18:20:42 -0500
From: Paul Tarlowe <ptarlowe@nac.net>
X-Mailer: Mozilla 4.06 [en] (Win98; U)
To: planning@njpines.state.nj.us
Subject: Tower comment

No new towers, please, especially in the Pinelands. There are enough
already.

Paul Tarlowe
40 Brookside Ave.
Hackettstown, NJ 07840
908-850-1007

*Pinelands*
*Preservation Alliance* 114 Hanover Street Pemberton, New Jersey 08068 Phone 609.894.8000 Facsimile 609.894.9455

November 22, 1999

Via Facsimile
John C. Stokes
Assistant Director, Planning & Management
New Jersey Pinelands Commission
15 Springfield Road
PO Box 7
Lisbon, NJ 08064

Re: Proposed PCS Facilities Plan

Dear Mr. Stokes:

The Pinelands Preservation Alliance ("PPA") and the New Jersey Conservation Foundation ("NJCF") submit the following additional comments on the proposed Comprehensive Plan for PCS Communications Facilities in the Pinelands, as revised through October 25, 1999. This letter will supplement PPA's oral testimony, in which the New Jersey Conservation Foundation joins.

PPA and NJCF want first to reiterate that we believe very strongly that the Commission has not provided adequate or fair opportunity for the public to review and comment upon the Plan and its purported bases in the record, and that the Plan remains wholly deficient in justification or demonstration that it meets the existing CMP requirements. We urge the Commission to extend the public comment period and make all information which the staff, the Commission and their experts may use in evaluating the Plan available to the public well before the close of the comment period. Without such disclosure and opportunity to review and comment, the Commission and the providers cannot meet the procedural and substantive requirements of the CMP.

**Lack of Support for Plan.** As we noted in our oral comments, the Plan is wholly lacking in scientific or any other kind of support for the assertions in the Plan that it meets CMP requirements. PPA was informed sometime on Friday, November 19, that certain charts may be available at the Commission to review. If this is correct, it is clearly unfair and inadequate opportunity to review and evaluate this material before today's close of public comment. During the comment period, PPA had asked whether there was any such material in the file for review and was told there was not. A last minute addition of these charts to the file cannot cure the lack of evidence in the public record to support the Plan.

**New Tower in the West Plains.** In PPA's oral testimony, we objected strongly to

the proposed construction of a new tower on the West Plains. Commission staff have since noted that the Plan may not include a new tower in the West Plains because the coordinates in the Plan for that facility lie off the West Plains. The Plan, however, expressly states that the providers require a new tower in the West Plains. The Plan, therefore, is at best highly ambiguous on a key point, and at worst misleading. For this reason alone, the Plan should not be approved in its current form.

**Amendment to the Existing Plan:** The new PCS Plan is not identified as an amendment to the existing wireless communications facilities plan previously approved by the Commission. It is instead presented as a separate plan. This method of presentation creates the possibility that the PCS providers would deem themselves authorized to construct new towers within a half-mile of the sites previously identified in the existing plan, whether or not the cellular providers also build within the approximate areas of the same sites on the existing plan. The Commission should not approve the proposed PCS Plan given this potentially disastrous ambiguity.

For all these reasons and those set forth in PPA's oral testimony, PPA and NJCF strongly urge the Commission to reject this plan as inconsistent with the CMP.

Sincerely,

Carleton K. Montgomery
Executive Director

Date: Tue, 23 Nov 1999 07:23:57 -0800 (PST)
From: Robert Hesse <rfhesse@yahoo.com>
To: planning@njpines.state.nj.us

Hi,

As a taxpayer and lifetime resident of the state of New Jersey I am opposed to opening of the pinelands as well as other wooded areas to development.

Sincerely,

Robert F. Hesse
5 Mawhinney Avenue
Hawthorne, NJ 07506
(973) 423-3544

# United States Department of the Interior

NATIONAL PARK SERVICE
Philadelphia Support Office
200 Chestnut Street
Philadelphia, PA 19106



IN REPLY REFER TO:
L7421(PHSO/S&P/PP&NR)

NOV 24 1999

William F. Harrison, Esq.
Acting Executive Director
The Pinelands Commission
P.O. Box 7
New Lisbon, NJ 08064

Dear Mr. Harrison:

This letter is submitted in response to the Commission's Public Notice, dated November 3, 1999, regarding a public hearing on a PCS facilities plan that has been submitted for certification by Sprint PCS and Omnipoint. Please consider this as our written testimony.

The National Park Service has reviewed the plan and has considered the comments of the public, Commission staff and others as regards their specific concerns and recommendations. Based on this review, and in consideration of the authorities, interests and responsibilities of the National Park Service in protecting the national interest in the Pinelands, we offer the following comments:

Public Involvement

The most common concern received by this office has been the perception that the procedures for public notice and comment, while meeting the provisions of the Comprehensive Management Plan (CMP), were inadequate for full public disclosure and informed comment. Specifically, there is a concern, shared by this office, that the need and siting of facilities, especially those to be located in the "height and least number of structures restricted" areas, is not demonstrated in the public information. We understand that the CMP provides, but that there has been no public request in this instance, for additional information or a continuance. Therefore, we recommend that such additional information be made available on future plans and amendments.

Pinelands National Reserve

The CMP, as approved by the Secretary of the Interior, identifies specific areas of critical importance within the Pinelands. These include several areas, such as the Mullica River, Pine Plains, and other scenic river corridors that are mentioned in the plan as being in the area of the proposed facilities. The plan further states that the PCS providers recognize their obligation to minimize the visual impact and that they will pursue locations and design features to mitigate the impact to the maximum extent practicable. However, the details of the location and design, which are matters beyond the plan, are subject to development applications that have yet to be written. In addition, the intended scenic "mitigation" and determination of "maximum extent practicable" may be difficult to achieve. Therefore, we request that we be kept informed of the developments as they progress.

Wild and Scenic Rivers

Both the Maurice and Great Egg Harbor National Scenic and Recreational Rivers contain natural, scenic and recreationally remarkable resources, which were the basis for designation into the national system. It is policy, as contained in the draft management plans for these rivers, to prohibit any development within the 1/4 mile federal boundary that negatively impacts these resources. Therefore, we request that the Commission keep us advised of any plan, amendment thereto and application for any development to be located or relocated within the boundary of these nationally designated rivers.

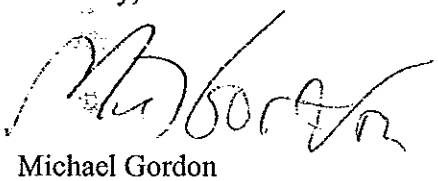
In this instance, we understand that there is only one site, facility #14 in Hamilton Township, located within the boundary of a nationally designated river--the Great Egg Harbor River. However, we also understand that no alternative sites were found and that the Township Zoning Board has approved the site. We request that we be kept informed of the development of this facility.

Land and Water Conservation Fund/Section 502

The National Park Service has continuing responsibilities under Section 6f of the Land and Water Conservation Fund Act of 1965, Public Law 88-578, and Section 502 of Public Law 95-625, which established the Pinelands National Reserve. This includes the assurance that no property acquired or developed with federal financial assistance shall be converted to other than intended uses without the approval of the Secretary of the Interior. We therefore request that we be advised of all plans, amendments and applications for development of communication facilities on or adjacent to any such lands.

Thank you for the opportunity to comment on these matters. If you have questions regarding this response, please contact Mr. Gene Woock of this office at 215-597-1903.

Sincerely,



Michael Gordon
Conservation Assistance Manager
Philadelphia Support Office
National Park Service

cc:
Robert McIntosh, RDO, Boston

**Janet Pierce**

**From:** <HarpSmith5@cs.com>
**To:** <info@njpines.state.nj.us>
**Sent:** Tuesday, November 30, 1999 8:07 PM
**Subject:** Communication Towers

I was very disturbed to hear of the increasing number of cell towers being built in the Pinelands. I truly believe that the mission of the Pinelands Commission should be that of conservation and the use of this region for any other purpose is unacceptable.

David A. Harpell

**HarpSmith5@cs.com, 05:45 PM 12/2/199, Fwd: Public Comment on PCS pla**

From: HarpSmith5@cs.com
Date: Thu, 2 Dec 1999 17:45:21 EST
Subject: Fwd: Public Comment on PCS plan
To: planning@njpines.state.nj.us
X-Mailer: Unknown (No Version) sub 44

Dear Ms. Piner,

As requested, my mailing address is:

2417 Ramshorn Drive
Manasquan, NJ 08736

Thank you,
David A. Harpell
Return-Path: <planning@njpines.state.nj.us>
Received: from rly-xa02.mx.cs.com (rly-xa02.mail.cs.com [172.31.34.47]) by
air-xa01.mail.cs.com (vx) with ESMTP; Thu, 02 Dec 1999 09:37:02 -0500
Received: from zeus.jersey.net (zeus.jersey.net [209.66.0.10]) by
rly-xa02.mx.cs.com (v65.4) with ESMTP; Thu, 02 Dec 1999 09:36:51
-0500
Received: from mholly-dial57.jersey.net (mholly-dial57.jersey.net
[209.66.6.57]) by zeus.jersey.net (8.9.1/or whatever) with SMTP id
JAA26603 for <HarpSmith5@cs.com>; Thu, 2 Dec 1999 09:37:02 -0500
(EST)
Message-Id: <3.0.6.16.19991202093237.0f570376@jersey.net>
X-Sender: planning@jersey.net (Unverified)
X-Mailer: QUALCOMM Windows Eudora Light Version 3.0.6 (16)
Date: Thu, 02 Dec 1999 09:32:37
To: HarpSmith5@cs.com
From: Betsy Piner <planning@njpines.state.nj.us>
Subject: Public Comment on PCS plan
Mime-Version: 1.0

Comments: Authenticated sender is <jstillwe@mediqprn.com>
From: "Jonathan Stillwell" <jstillwe@mediqprn.com>
To: planning@njpines.state.nj.us
Date: Tue, 30 Nov 1999 14:15:18 +0000
Subject: Say No to towers.
Reply-to: jstillwe@mediqprn.com
X-Confirm-Reading-To: jstillwe@mediqprn.com
X-pmrqc: 1
Priority: normal
X-mailer: Pegasus Mail for Win32 (v2.42)

Dear Sirs and Madams:

I am against the building of celllular towers in the pines. They totally take away from the beauty of the pygmy forest and are a hazard to birds. The birds are bringing in more and more money for the state in terms of the birdwatcher tourist dollar. Birdwatchers are always upper class people who spend alot of money when they visit, and don't cause other problem such as littering.
Why should we let telephone companies determine that our pines are desposable so they can claim total coverage areas for cellular phone users. The inconvenience to cellular phone users would be minimal if they simply cannot use their phones in the woodlands. Your agency should not belong to Comcast.
Then there is the issue of wilderness development. Building a road through virgin pinelands to a tower site is a waste of habitat and invites vandalism, littering and firebug activity.
Finally, in 5 to 10 years it's evident that the cellular phone network will be satellite based, and these towers will become obsolete.
If you take the money for the cellular towers, you will be selling out to outside interests, harming the pinelands in a way that will discourage eco-tourism, and leaving your agency with useless towers that will be expensive to remove, or be a hazardous playground for anyone who happens upon them. Imagine the ensuing lawsuits when a teen falls from the reckage of an old tower.

Jonathan Stillwell
121 Oswego Avenue
Audubon, New Jersey 08106

X-Originating-IP: [204.126.143.33]
From: "Amie Osowski" <amie_osowski@hotmail.com>
To: planning@njpines.state.nj.us
Subject: Towers in the Pinelands
Date: Thu, 02 Dec 1999 10:09:16 PST

Please do not allow anymore communications towers in the Pinelands!

Amie Osowski
35 Glen Manor Drive
Glen Gardner, NJ 08826
amie_osowski@hotmail.com

From: pbx@cybercomm.net
Date: Tue, 14 Dec 1999 22:07:49 -0500
X-Mailer: Mozilla 4.61 [en] (Win95; U)
X-Accept-Language: en
To: planning@njpines.state.nj.us
CC: Phil Reynolds <mailbox@gsenet.org>, ppa <ppa@pinelandsalliance.org>,
Kerry Jennings <bamber@cybercomm.net>,
alison <alison@shorenetworks.com>, Audrey Moloney <APZM@AOL.Com>,
Bob Bruneau <bruneau@skyhigh.com>, Bob Moyer <pbx@cybercomm.net>,
Claire Moyer <ClaireKM@AOL.Com>, craig noak <cnoack@erols.com>,
Joe Wszolek <oltown@AOL.Com>, Mike Baker <mike@mikebaker.com>,
PAUL Follman <PAUL.FOLLMAN@inrange.com>,
Thomas Daily <tjdaileejc@AOL.Com>, Doug Cook <kcook@skyhigh.com>
Subject: Personal Communication Service Plan Comment

Please entertain my objection as a private citizen to a portion of the
Personal Communications Services Plan within the Pinelands as written. I
object to proposed facility numbers 33 and 62 because a facility in
these locations will ruin forever the sense of the last remaining wilderness in Southern New Jersey.

In the plan, the PCS providers propose that..."if service does not exist,
calls.....do not go through...and that compromises the safety and security
of those...traveling through the Pinelands area" (page 3).

If you use this logic, we need to provide cell phone service in every
wilderness area in North America. No trip to Denali National Park in
Alaska would be complete without immediate phone access would it? Just
place one over there on top of Mt. McKinley!

My point is, we need to keep that area of wilderness along Route 72 and
539 just the way it is for people like me...people who need to get away
for awhile, without the distractions found throughout the rest of this
crowded state. I'm more than willing to take my chances with a

lack of
service in these areas for the sake of a true wilderness experience.

I want to tell you something, and this might seem like strange behavior
to some people. About 3 weeks ago, I climbed up to the top of a 25-foot
pitch pine tree that was located about ¼ mile South of Route 72 in the
West Pygmy Pine Plains. The view from just 25 feet up in this fabled
area was both wild and exhilarating. There were nothing but pines and
cedar trees in every direction for miles. I felt a great sense of relief
and gratitude for this remaining area. Are you going to take this experience away from me? Is nothing sacred anymore?

Lets save this last piece of truly wild Pine Barren landscape for people
like me…for now, and forever.

Bob Moyer
Bamber Lake, NJ

Robert Moyer
2424 Phillips Road
Forked River, NJ 08731

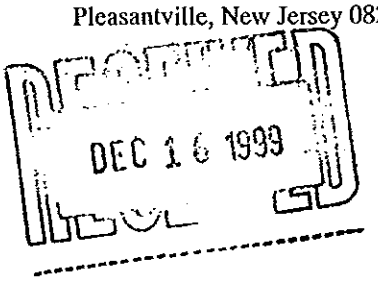
Date: Wed, 15 Dec 1999 10:47:16 -0800 (PST)
From: mildred kaliss <budmilmilbud@yahoo.com>
Subject: cellular phone towers in pinelands
To: planning@njpines.state.nj.us

I oppose the construction of cellular phone towers in the Pinelands. This area should be left in its pristine state.
Edward Kaliss 137 Chaucer Place, Cherry Hill, N.J. 08003

# United States Department of the Interior

FISH AND WILDLIFE SERVICE
Ecological Services
927 North Main Street (Bldg. D1)
Pleasantville, New Jersey 08232

ES-99/363




December 10, 1999

Dr. Barry Brady
New Jersey Pinelands Commission
P.O. Box 7
New Lisbon, New Jersey 08064

Dear Dr. Brady:

The U.S. Fish and Wildlife Service (Service) has reviewed the *Comprehensive Plan for Personal Communication Service (PCS) Facilities in the Pinelands Area* (Plan) submitted to the New Jersey Pinelands Commission by Sprint PCS and Omnipoint on October 25, 1999. The Plan includes a total of 67 existing and proposed PCS facilities within the Pinelands. Thirteen of these facilities could potentially consist of new towers, rather than collocation of equipment on existing buildings or towers within the Pinelands. Table 1 depicts seven proposed PCS communication facilities, which might be located on existing structures (i.e., undetermined). Table 2 identifies six proposed facilities, which are unlikely to be located on existing structures.

Table 1. Proposed PCS communication facilities for which collocation on existing structures is undetermined.

| Site ID # | Latitude | Longitude | Municipality | County |
|---|---|---|---|---|
| 10 | 39.65050 | 74.79030 | Hammonton | Atlantic |
| 13 | 39.60420 | 74.88190 | Folsom | Atlantic |
| 17 | 39.35778 | 74.88749 | Maurice River | Cumberland |
| 33 | 39.91600 | 74.38300 | Manchester | Ocean |
| 34 | 39.75500 | 74.31300 | Barnegat | Ocean |
| 41 | 39.79700 | 74.58100 | Tabernacle | Burlington |
| 65 | 39.72333 | 74.37556 | Bass River | Ocean |

Table 2. Proposed PCS communication facilities for which collocation on existing structures is unlikely.

| Site ID # | Latitude | Longitude | Municipality | County |
|---|---|---|---|---|
| 14 | 39.56530 | 74.81830 | Hamilton | Atlantic |
| 15 | 39.51810 | 74.78831 | Hamilton | Atlantic |
| 20 | 39.89720 | 74.59330 | Woodland | Burlington |
| 40 | 39.37440 | 74.76190 | Estell Manor | Atlantic |
| 62 | 39.82166 | 74.44750 | Woodland | Burlington |
| 64 | 39.95333 | 74.41056 | Manchester | Ocean |

The New Jersey Pinelands represents a unique environment. The Pinelands is the most extensive tract of open space on the mid-Atlantic coast and is home to many rare species of flora and fauna. In an attempt to preserve the Pinelands and its unique natural and cultural resources, the United States Congress passed the Federal Pinelands National Preserve Act of 1978 (P.L. 95-625). In 1979, the State of New Jersey passed legislation to protect the Pinelands via the Pinelands Protection Act (N.J.S.A. 13: 18A), which resulted in the creation of the Pinelands Commission. As you are aware, the Pinelands Commission, through the Pinelands Comprehensive Management Plan , is the governing regulatory authority over the Pinelands National Reserve. In addition, the United Nations Educational, Scientific and Cultural Organization recognizes the significance of this relatively undisturbed environment, and in 1983 designated the Pinelands as the first international Biosphere Reserve.

The Service recognizes the benefits of wireless communication service to human safety; nevertheless, the Service has a mandated responsibility to protect our nation's federal trust fish and wildlife resources, which include migratory birds and plants and animals protected under the Endangered Species Act (87 Stat. 884;16 U.S. C. 1531 *et seq.*). Communication towers have been blamed for the deaths of millions of migratory birds (Kane, 1998). In addition, several federally listed species inhabit the Pinelands. In view of this, the Service has concerns regarding the potential placement of up to 13 new communication towers within such an ecologically sensitive preservation area.

The Service has reviewed the locations of the proposed PCS facilities listed in Tables 1 and 2 of this letter and provides the following comments.

## FEDERALLY LISTED SPECIES

Nine of the proposed communications towers listed in Tables 1 and 2 have the potential to affect federally listed endangered species, depending on the final design and location of the facilities. Service records indicate that federally listed endangered and threatened species occur within less than 5.0 miles of the latitude and longitude (as provided in the Plan) of tower sites 10, 20, 33, 34, 40, 41, 62, 64, and 65. Those species that may be adversely affected by construction activities include the federally listed (threatened) bog turtle (*Clemmys muhlenbergii*), Knieskern's beaked-rush (*Rhynchospora knieskernii*), sensitive join-vetch (*Aeschynomene virginica*), and swamp pink (*Helonias bullata*); the federally listed (endangered) American chaffseed (*Schwalbea americana*); and bog asphodel (*Narthecium americanum*), a candidate species under consideration by the Service for possible inclusion on the list of Endangered and Threatened Wildlife and Plants.

Federally listed species are afforded protection under the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*) pursuant to Section 7(a)(2), which requires every federal agency, in consultation with the Service, to ensure that any action it authorizes, funds, or carries out is not likely to jeopardize the continued existence of any listed species or result in the destruction or adverse modification of critical habitat. An assessment of potential direct, indirect, and cumulative impacts is required for all federal actions that may affect listed species. Therefore, any proposed activities that may directly or indirectly affect American chaffseed, bog turtle, Knieskern's beaked-rush, sensitive join-vetch, swamp pink, or other federally listed species under the jurisdiction of the Service, would require Section 7 consultation with the Service.

## NATIONAL WILD AND SCENIC RIVERS SYSTEM

A review of Service records indicates that four of the proposed PCS communication facilities (sites 13, 14, 15, and 40) are located within the vicinity of the Great Egg Harbor National Scenic and Recreational River. The National Wild and Scenic Rivers System was established for the protection of designated rivers (and their surrounding environments) containing important scenic and recreational values, fish and wildlife, and historic and cultural sites. Therefore, the Service recommends that the Pinelands Commission invite comments from the National Park Service regarding potential adverse impacts of cellular towers to the Great Egg Harbor National Scenic and Recreational River. Please contact the following office of the U.S. Department of the Interior:

National Park Service
Philadelphia Support Office
200 Chestnut Street
Philadelphia, Pennsylvania 19106

## MIGRATORY BIRDS

The growing number of communication towers and antennas in New Jersey represents a potential cumulative impact concern regarding migratory birds. Migratory birds are a federal trust resource and are protected under the Migratory Bird Treaty Act (40 Stat. 755; 16 U.S.C. 703-712). Communication towers and antennas may pose a collision hazard to migratory birds in flight and may pose a threat to nesting birds attracted to the site, depending on tower height, physical design, lighting, and nest location. To avoid potential cumulative adverse impacts to migratory birds, the Service prefers and recommends concealing antennas or attaching new antennas to existing structures. If this is not feasible, and tower construction is deemed necessary, tower design should allow for multiple transmitters to be located on a single new tower, under 200 feet in height and constructed without lights or guy wires. In addition, the tower should be located in a previously disturbed area to minimize environmental impacts. Enclosed is a paper entitled "Impacts from Communication Towers and Antennas," which contains recommendations to protect migratory birds.

The Service appreciates the opportunity to provide comment on the Plan. Please contact Andrea Cherepy of my staff at (609) 646-9310 extension 30 if you have any questions about the enclosed material or require further assistance regarding communications towers and their potential adverse impacts to federal trust resources.

Sincerely,

Clifford G. Day
Supervisor

Enclosure

## REFERENCE

Kane, R. 1998. Birds and Tower Kills. *New Jersey Audubon*, Winter 1998-1999: 26-27.

# IMPACTS FROM COMMUNICATION TOWERS AND ANTENNAS

## Authority

The Federal Communication Commission (FCC) requires all license applicants for antenna facilities and structures, including cellular communication towers, to review their proposed actions for environmental consequences. The FCC rules implementing the National Environmental Policy Act of 1969 (83 Stat. 852; 42 U.S.C. 4321 *et seq.*) (NEPA) are presented under 47 CFR Sections 1.1301 to 1.1319. These rules place responsibility on each applicant to investigate all of the potential environmental effects of tower construction. Section 1.1307(a) lists several categories that may significantly affect the environment. Included in this list are: facilities proposed for location in a wilderness area, wildlife preserve, or flood plain; facilities that may affect federally listed threatened or endangered species or designated critical habitat, or are likely to jeopardize the continued existence of any proposed endangered or threatened species or likely to result in the destruction or adverse modification of proposed critical habitats, as determined by the Secretary of the Interior pursuant to the Endangered Species Act (87 Stat. 884; 16 U.S.C. 1531 *et seq.*); and facilities whose construction will involve significant change in surface features (e.g., wetland fill, deforestation, or water diversion). If the proposed antenna structure falls under one of the listed categories, Section 1.1308(a) requires the applicant to prepare an Environmental Assessment (EA) addressing alternative sites or facilities (Section 1.1311(a)(4)) and all aspects of the site with special environmental significance, (e.g., wilderness areas, wildlife preserves, natural migration paths for birds and other wildlife (Section 1.1311(b)). Under section 1.1307(c), preparation of an EA may also be required for actions otherwise categorically excluded, if an interested party petitions the FCC with environmental concerns.

## Migratory Birds

All native migratory birds (e.g., waterfowl, shorebirds, passerines, hawks, owls, vultures, falcons) are afforded protection under the Migratory Bird Treaty Act (40 Stat. 755; 16 U.S.C. 703-712). Migratory Birds are a federal trust resource responsibility, and the U.S. Fish and Wildlife Service (Service) considers migratory bird concentration areas as environmentally significant.

Communication towers and antennas may pose a collision hazard to migratory birds in flight and may pose a threat to nesting birds attracted to the site, depending on tower height, physical design, lighting, and site location. To avoid potential cumulative adverse impacts to migratory birds, the Service prefers and recommends concealing antennas or attaching new antennas to existing structures. Antennas have been concealed on rooftops; flagpoles; bell, cross, and clock towers; road signs; silos; water towers; monopoled towers; and custom projects. Where attachment to an existing (non-tower) structure is not feasible, new transmitters should be co-located on existing towers to avoid construction of new towers. If this is not feasible and tower construction is deemed necessary, tower design should allow for multiple transmitters to be co-

located on a single new tower, under 200 feet in height and constructed without lights or guy wires.

Occurrences of mortality from birds colliding into towers under foggy daytime conditions are documented in scientific literature. Occurrences are also documented of birds congregating around towers with aviation warning lights while migrating at night during inclement weather. During these events, birds circling the towers have been killed from colliding with guy wires, other birds, and the ground, and have died from exhaustion. Therefore, to protect migrating birds, communication towers and associated facilities should be sited away from bird concentration areas, which include: traditional migratory flight corridors (e.g., ridges, shorelines, river valleys); stopover or resting areas (e.g., land bounding large bodies of water, wetlands, forests, and natural grasslands); bird reserves (e.g., National Wildlife Refuges, State Wildlife Management Areas, private sanctuaries); and seasonal flight paths (e.g., between feeding and nesting or roosting areas). Some of the primary bird concentration areas of concern in New Jersey include the Cape May peninsula, the Delaware Bay and coast, the Delaware and Hudson River corridors, the Atlantic Coast, and the Highlands ridges. Also, the Service maintains five National Wildlife Refuges in New Jersey: Cape May, Edwin B. Forsythe, Great Swamp, Supawna Meadows, and Walkill River. More information about National Wildlife Refuges is enclosed.

Birds, other than nocturnal birds such as owls, generally have poor night vision. To allow birds to detect and avoid tower guy wires, the Service recommends increasing the visibility of tower guy wires to birds, particularly at night. Increased visibility should be accomplished without the use of artificial lighting (i.e., through manufacturing, the use of reflective paint or other materials, attaching large balls, or the use of other available technology).

As communication technology advances and tower-based technology becomes obsolete, the Service recommends decommissioning those towers that are no longer needed, particularly towers within bird concentration areas. Tower decommissioning, including removal, should be provided for in any application for license submitted to the FCC.

Information on tower kills, including mechanisms, studies, literature, bibliographies, legislation, links, and summaries by state, is provided on the following website: *http://www.towerkill.com.* Information regarding the affects of lighted structures on migrating birds can be found in the 1996 publication by the World Wildlife Fund and the Fatal Light Awareness Program, entitled; *Collision Course: the hazard of lighted structures and windows to migrating birds.* In addition, the Service's Office of Migratory Bird Management maintains a partial bibliography of over 125 citations (1960-1998) on bird kills at towers and other man-made structures. The bibliography may be accessed at the following website: *http://www.fws.gov/r9mbmo/issues/tower.html.*

## Wilderness Areas

Wilderness is a designation made by Congress pursuant to the Wilderness Act (78 Stat. 890; 16 U.S.C. 1131-1136), which established the National Wilderness Preservation System. The Act defines wilderness as "an area where the earth and its community of life are untrammeled by man, where man himself is a visitor who does not remain; an area of underdeveloped federal land retaining its primeval character and influence, without permanent improvements or human habitation and which is protected and managed to preserve its natural conditions." Therefore, by definition, no cellular towers or antenna facilities are permitted within federally designated wilderness areas. In New Jersey, federally designated wilderness areas are associated with two larger federal land holdings, Great Swamp National Wildlife Refuge and Edwin B. Forsythe National Wildlife Refuge. These areas are given the added designation of "wilderness" to preserve their natural values; permanent structures in wilderness areas are prohibited.

## National Wildlife Refuges

The Service administers a national system of wildlife refuges. Five National Wildlife Refuges have been established within the State of New Jersey, each with a role in protecting the diversity of our Nation's flora and fauna and the natural habitats upon which our native species depend. The National Wildlife Refuge System Administration Act of 1966 (80 Stat. 927; 16 U.S.C. 668dd-668ee) provides guidelines and directives for administration and management of all areas in the refuge system. In order for a commercial cellular tower or antenna facility to be constructed within a National Wildlife Refuge ( i.e., Cape May, Edwin B. Forsythe, Great Swamp, Supawna Meadows, or the Wallkill River National Wildlife Refuge), a compatibility determination would be required before a Special Use Permit from the Service's Division of Refuges and Wildlife could be granted.

**For further information, please contact:**

U.S. Fish and Wildlife Service
New Jersey Field Office
927 N. Main Street, Building D-1
Pleasantville, New Jersey 08232
Phone: (609) 646-9310
Fax: (609) 646-0352

Pinelands
Preservation Alliance

114 Hanover Street Pemberton, New Jersey 08068 Phone 609894.8000 Facsimile 609894.9455
E-mail ppa@pinelandsalliance.org



December 16, 1999



Via Facsimile and First Class Mail
John C. Stokes
Assistant Director, Planning & Management
New Jersey Pinelands Commission
15 Springfield Road
PO Box 7
Lisbon, NJ 08064

Re: Proposed PCS Facilities Plan

Dear Mr. Stokes:

The Pinelands Preservation Alliance ("PPA") and the New Jersey Conservation Foundation ("NJCF") submit these supplemental comments on the proposed Comprehensive Plan for PCS Communications Facilities in the Pinelands, as revised through October 25, 1999. We appreciate the Commission's extending the period for public comment. Having reviewed the material incorporated into the Commission's file on this matter, we conclude that the proposed Plan clearly does not meet the standards of the Comprehensive Management Plan and must be rejected.

**Lack of Support for the Plan.** We have reviewed the additional material in the Pinelands Commission file on the Plan and the draft Technical Report of the Commission's consultants dated November 23, 1999. Unfortunately, these materials confirm that there is no scientific support for the proposed Plan or its assertions it meets CMP requirements in the public record. We note the following deficiencies in this regard:

- The only data supplied by the applicants are ANET plots for the six proposed new towers beyond those already approved. These plots prove nothing of relevance because (a) they use different signal levels as thresholds, (b) those plots which identify signal thresholds as "marginal" and "adequate" provide not basis, and there is no basis elsewhere in the record, to justify those designations, and (c) the plots necessarily make assumptions about the location of other, nearby facilities that are not substantiated as accurate and current.

- The draft Technical Report also provides no basis whatsoever to conclude that the Plan meets CMP requirements. Specifically,

  - The Report does not discuss or seek to justify the signal thresholds which the applicants use on the ANET charts. Since neither the Commission's consultants nor the applicants provide any justification for those thresholds, either in the form of technical analysis, experiments or industry standards, they remain essentially meaningless in terms of the CMP standards. It is telling that, after this issue was so clearly raised with respect to the first cellular plan, neither PCS companies nor the Commission has even attempted to justify in the public record any reason to accept any given signal strength as the measure of "adequate service."

  - The Report does, for the first time, discuss numerical criteria for the three *different* parameters of signal to interference ratio, dropped call rate and blocked call rate. However, it is astonishing that the Report *does not even attempt to link those criteria to the proposed PCS Plan.* Instead, the Report states only that *future* amendments should be judged against those criteria.

  - In addition, the Report fails to link those three parameters to the actual basis for the Plan, the signal thresholds reflected in the ANET plots, and the Report fails to provide any basis for the numerical criteria it lists.

  - The Report claims that the criteria used for evaluating "Quality of Service" are the same as used to evaluate the cellular plan. This is not credible given that (a) the consultants' report on the cellular plan never provided quantitative or qualitative measures for the three parameters and (b) the draft Report on the PCS Plan never attempts to apply the new numerical measures to the PCS Plan.

- The Technical Report purports to rely on a range of data and information which it identifies only in wholly summary fashion. These materials are said to include, for instance, calculations and experiments reported by the providers as the basis for the Plan, "limited" independent experiments, results of field tests conducted by Sprint Spectrum L.P., unidentified "background, technical, administrative and

other information," and various unidentified correspondence. None of this material, other than the few ANET plots discussed above, has been included in the public record. It would not be proper for the Commission to rely on a technical report which is itself based on information that is not in the record and available for public review.

- The record contains representations by the providers that are not verified in the public record. For example, in a November 22, 1999 letter from Mr. Zublatt it is claimed that the providers conducted tests to verify proposed and existing PCS coverage, yet those tests are not documented in the record.

**New Towers.** As we have previously noted, the Plan calls for construction of new towers in the area of the Pine Plains and the Great Egg Harbor River. There is a lack of specific information or confusion over where these towers are really going to be located, given the latitude built into the proposed Plan as to actual locations. We object very strongly to approving the Plan if it would make it possible for providers to build towers on the Pine Plains or in the corridor of any river designated for special protections by the federal Wild & Scenic Rivers program or the CMP.

**Plan Is Designed To Serve Roads, Not Communities:** The draft Technical Report makes clear, for the first time, that the proposed PCS Plan's new towers are located in order to serve roads, not communities. The Commission should reexamine this key point, as it should provide a basis to reduce the number of new towers that must be approved as required to provide "adequate service."

**The Plan Is Not Comprehensive:** The proposed Plan is not presented by all PCS companies that have licenses to provide service in the Pinelands. The Commission has already undermined the requirement for a "comprehensive" plan by approving the existing cellular plan without the PCS providers. It would simply make a mockery of that concept to approve this plan without even having all PCS providers involved.

The Plan excuses this defect by stating that "The Plan signatories are those current PCSs, licensed by the Federal Communications Commission (FCC) to provide such service throughout southern New Jersey including the New Jersey Pinelands, as are ready, willing and able to participate in preparation of such a plan." The willingness of the other providers is not and should not be an excuse from meeting the CMP requirement. There is no evidence that it is not feasible for the other providers to

participate. The evidence is simply that they are not willing. In this circumstance, the CMP clearly requires that no additional towers be approved for exemption from the CMP's height limitations.

**Amendment to the Existing Plan:** As we have already noted, the new PCS Plan is not identified as an amendment to the existing wireless communications facilities plan previously approved by the Commission. It is instead presented as a separate plan. This method of presentation creates the possibility that the PCS providers would deem themselves authorized to construct new towers within a half-mile of the sites previously identified in the existing plan, whether or not the cellular providers also build within the approximate areas of the same sites on the existing plan. The Commission should not approve the proposed PCS Plan given this potentially disastrous ambiguity.

For all these reasons and those set forth in PPA's oral testimony, PPA and NJCF strongly urge the Commission to reject this plan as inconsistent with the CMP.

Sincerely,

Carleton K. Montgomery
Executive Director
Pinelands Preservation Alliance

GIORDANO, HALLERAN & CIESLA
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
125 HALF MILE ROAD
POST OFFICE BOX 190
MIDDLETOWN, NEW JERSEY 07748
(732) 741-3900
FAX: (732) 224-6599
441 EAST STATE STREET
TRENTON, NEW JERSEY 08625
(609) 695-3900
PLEASE REPLY TO: MIDDLETOWN





DIRECT DIAL NUMBER
(732) 219-5486

DIRECT E-MAIL
mgross@ghclaw.com

CLIENT/MATTER NO.
11644/002

December 16, 1999

Via Federal Express
William F. Harrison, Esq.
Acting Executive Director
The Pinelands Commission
P.O. Box 7
57 Springfield Road
New Lisbon, NJ 08064

Re: Comment on PCS Facilities Plan

Dear Mr. Harrison:

Please be advised that this firm represents Delaware Valley Cellular Communications, doing business as "Cellular One," which is a provider of cellular phone service, and Delaware Valley PCS Communications, which is licensed to provide PCS Communications Services within a portion of the Pinelands.

We have reviewed the comprehensive plan for PCS Communications Facilities in the Pinelands submitted by Sprint Spectrum, L.P. and Omnipoint PCS Entrepreneurs, Inc. dated December 23, 1998 revised through October 25, 1999 ("PCS Plan"). On behalf of our clients we have two primary concerns.

The first concern, on behalf of Cellular One, is that the approval of this PCS Plan, in its present form, would jeopardize the ability of the cellular providers, which already have an approved plan, to retain the lead role in developing certain sites under that plan approved in September of 1998 (the "Cellular Plan"). The cellular providers spent four years designing the Cellular Plan and the PCS Plan merely supplements the Cellular Plan with the addition of several sites. Additionally, it would not be conducive to the spirit of cooperation and "least number of

towers" in either the Cellular Plan or the PCS Plan if both cellular and PCS providers pursue separate lead roles in working to develop the sites listed on both plans.

Therefore, we propose that prior to a PCS carrier being allowed to initiate negotiations, etc., for a site, they obtain the consent of the prime cellular carriers identified in the Cellular Plan, which consent would not be unreasonably withheld. The spirit and intent of the Cellular Plan would thereby be implemented without the problematic scenario of both cellular and PCS carriers attempting to take the lead on these common sites.

The second concern is on behalf of Delaware Valley PCS Communications, which owns certain PCS licenses within parts of the Pinelands Area. This PCS interest is not specified in the PCS Plan. Although we chose not to participate as a lead or to influence the location of sites in the proposed PCS Plan, we hereby request to be listed in that Plan as a co-locator so that we are advised of co-location opportunities and have an opportunity to reserve space on the proposed sites.

Thank you for the opportunity to submit these comments and should you have any additional questions, please do not hesitate to contact me.

Very truly yours,

Michael J. Gross

MICHAEL J. GROSS by Dara Rubenstein

MJG/cc