



April 5th, 2026

Town of Groton
Planning Board
173 Main Street
Groton, MA 01450

Re: Narrative for Supporting the Applications for Special Permit (Sec. 218-10.1) and Site Plan Review (Sec. 218-2.5) for the Proposed Personal Wireless Services Facility @ Groton-Dunstable Regional School District Property_703 Chicopee Row

Petitioners: TowerCom C-PRV, John Stevens, Bene Dituri

Dear Members of the Town Planning Board:

On behalf of TowerCom Enterprises C-PRV (“TowerCom”), we respectfully submit this application for a Special Permit pursuant to Section 218-10.1 and Site Plan Review pursuant to Section 218-2.5 of the Town of Groton Zoning By-Laws, for the construction of a 120-foot monopole (+ 5-foot lightning rod) personal wireless services facility on property owned by the Groton-Dunstable Regional High School District at 703 Chicopee Row.

This letter summarizes how the proposed facility complies with the applicable provisions of the Groton Zoning By-Laws and outlines the materials submitted in support of this application and the steps that TowerCom has taken up this point of filing the Petitions.

I. Executive Overview

The proposed project consists of the installation of a 120-foot monopole telecommunications tower (+ 5 ft lightning rod, and appurtenances), associated ground equipment, and related infrastructure designed to support multiple wireless carriers. T-Mobile will collocate its wireless communications facilities to the tower and is attached to TowerCom’s zoning petition. The monopole will be located in a 35 ft. x 70 ft. lease compound, secured by fencing, just west of the existing Town maintenance facility and garage.

The facility is intended to improve wireless coverage in the town and throughout the school district property, enhance emergency communications reliability for first responders, as well as provide lease revenue to the School District.



A. Coordination with Town and Stakeholders

TowerCom has held numerous conversations with Town staff and officials (“Land Use Committee”), starting with an “Informational Session” that was held on December 17, 2025 to discuss the proposed development, the school district’s needs, and the town’s needs for more robust and consistent emergency communications. TowerCom’s engineering team (TEP OPCO, LLC) has submitted a certified letter pursuant to the Town’s By-Laws describing the need from their analysis (see enclosed Exhibit D). TowerCom has also received acknowledgment of the need from other wireless network operators, including T-Mobile, whose collocation interest is attached to the Special Permit petition (see enclosed Exhibit I).

At the conclusion of the Informational Session” TowerCom began to address many of the questions and comments of the group to prepare for a Pre-Submission Review meeting with the Town Planning Board.

On February 25th, 2026, after reviewing the proposal with the Patriot Regional Emergency Communications Center, TowerCom’s proposal was confirmed to provide adequate “standoff” (setback) from the Town’s microwave equipment and path, mitigating any potential concerns for physical interference (see enclosed Exhibit J).

On February 26th, 2026, TowerCom presented the proposed development to the Town Planning Board as a Pre-Submission Review discussion at the Town’s public meeting. Several site design topics were discussed during the meeting including TowerCom’s request for setback waivers which are currently included in the Zoning petitions for the Board’s consideration.

II. Project Overview

A. Compliance with Section 218-10.1 – Personal Wireless Services Facilities

The proposed facility complies with the intent and requirements of Section 218-10.1, along with the requested waivers related to setback provisions, which are included in the application. The requested setback waivers are limited in scope and are necessary to allow the facility to be sited in a location that both satisfies technical requirements and minimizes broader impacts to surrounding areas.

As demonstrated in the certified engineering materials prepared by TEP OPCO, LLC:

- The tower has been designed as a **monopole structure** with minimal visual profile. There are no external lighting elements of the tower or compound currently incorporated into the design as discussed with the Planning Board. The lease compound will be secured by a galvanized chain link fence.



- The proposed site represents the least intrusive and most technically feasible placement, balancing coverage objectives with community needs and impact considerations.
- The facility is designed to accommodate multiple carriers, aligning with by-law preferences for shared infrastructure.
- The facility will comply with all applicable Federal regulations, **and** State and local building and safety codes.

B. Compliance with Section 218-2.5 – Site Plan Review

The application includes detailed plans addressing site design, parking, utilities, and drainage. The facility will generate minimal traffic and will be designed to operate independently from school infrastructure.

TowerCom believes the proposed facility meets the technical needs of the community and bridges an important coverage gap that exists within the Town while meeting the intent of the Town's zoning requirements. We respectfully request approval of the Special Permit and Site Plan Review.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'John Stevens', is written over a horizontal line.

John Stevens
Vice President
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Encl: Exhibit D - MA Licensed Engineering Reports by TEP
Exhibit I – TMobile confirmation letter of coverage need
Exhibit J – Correspondence with Patriot Regional Emergency Communications Center