

ACME Heritage Consultants LLC

Archaeology • Architectural History • Preservation Planning

February 9, 2026

Re: Preliminary Historical Resources Review of the Groton TWR-X Chicopee Telecommunications Project

ACME Heritage Consultants LLC (ACME) has been contracted by the Trileaf Corporation, on behalf of TowerCom C-PRV, LLC, to provide a review of the proposed undertaking as specified in the Federal Communications Commission 2004 (FCC 04-222) Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission. This agreement implements Section 106 of the National Historic Preservation Act of 1996, as amended ("NHPA") (codified at 16 U.S.C. §470f), requiring federal agencies to take into account the effects of certain of their Undertakings on Historic Properties. Information gathered by ACME will be submitted to the FCC as part of the Form 620 New Tower Submission Packet.

Historic Property is defined as "Any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register maintained by the Secretary of the Interior. The Area of Potential Effects for the undertaking is separated, for the purposes of the agreement, as the APE for visual effects and the APE for direct effects. The APE for direct effects is "limited to the area of potential ground disturbance on any property, or any portion thereof, that will be physically altered or destroyed by the Undertaking." The APE for visual effects is "the geography area in which the Undertaking has the potential to introduce visual elements that diminish or alter the setting, including the landscape, where the setting is a character-defining feature of a Historic Property that makes it eligible for listing on the National Register.

The proposed undertaking will have an overall height, including all appurtenances, of 125'-0" above ground level. The agreement (FCC 04-222) specifies that the APE for visual effects is a half mile from the tower site "if the proposed Tower is 200 feet or less in overall height."

ACME conducted a search of the files of the Massachusetts Historic Commission (Massachusetts State Historic Preservation Office) using the MACRIS Maps online system on February 4, 2026. There are no previously reported Historic Properties within the APE for direct effects or the APE for visual effects.

As per the agreement (FCC 04-222) a field visit is now needed to further investigate if previously unidentified historic properties are present in the APE for direct effects. This field visit will take place when the ground is snow free.

Sincerely,



Matthew Spigelman, PhD, RPA
Principal, ACME Heritage Consultants LLC