



May 26, 2026

Town of Groton
Zoning Board of Appeals
173 Main St.
Groton, MA 01450

RE: 703 Chicopee Row – Proposed 120-foot monopole personal wireless services facility

Dear Members of the Town of Groton - Zoning Board of Appeals,

To the extent that the requested relief from dimensional requirements may be interpreted as a variance under M.G.L. Chapter 40A, Section 10 and Groton Zoning By-Law §218-2.4.B(2), TowerCom C – PRV, LLC (“TowerCom”) respectfully submits the following narrative in support of its ZBA Application Form:

A. Description of the Land and Proposed Use

The subject property is located at 703 Chicopee Row and is owned by the Groton-Dunstable Regional School District. The site includes existing municipal and school-related buildings, including a Town maintenance facility and associated improvements.

The proposed use is the installation of a 120-foot monopole personal wireless services facility, including associated ground equipment within a secured 35 ft x 70 ft lease compound. The facility is designed to support multiple wireless carriers and improve telecommunications service within the Town and the school district. T-Mobile is identified in the Special Permit application as the initial colocation tenant on the site.

B. Identification of Requested Variances

The Applicant seeks relief from the following provisions of the Groton Zoning By-Law:

- **§ 218-10.1 (G)(2) - Setback requirements from 5% slope areas (150 feet).** Proposed tower location is on a slight ridge and is approximately 40 ft away from where grade exceeds a 5% slope.
- **§ 218-10.1 (G)(3) - Setback requirements from existing structures (500 feet).** Proposed tower is approximately 110 ft from the existing Town maintenance building and approximately 175 ft from the existing Town emergency communications self-support tower.



These relief requests are necessary to accommodate the proposed facility at the most technically feasible location on the property for both the Applicant's tenants (wireless carriers) and the property owner (GDRHS).

C. Unique Site Conditions

The subject property is uniquely constrained by a combination of:

- **Topographic & dense forestation conditions**, including areas of slope that trigger setback requirements throughout the parcel; the proposed location minimizes required clearing and limits visibility from abutting parcels
- **Existing municipal and school-related improvements**, limiting available siting areas on the parcel; the proposed tower location was carefully sited in coordination with the Town officials and the GDRHS district.
- **The need to maintain appropriate separation from existing public safety communications infrastructure**, including microwave paths and equipment; and
- **Radiofrequency engineering requirements**, which dictate precise siting to fill a demonstrated coverage gap in the Town.

D. Substantial Hardship

Literal enforcement of the zoning requirements would result in substantial hardship by effectively precluding the development of a telecommunications facility capable of effectively addressing the documented coverage gap.

TowerCom has submitted information to the Planning Board and presented radiofrequency data from Ookla, a global leader in connectivity intelligence, demonstrating the gap. The need has also been verified by T-Mobile (see attached letter).

Additionally, and as noted by Brian Falk (Town Counsel) in an email dated May 14, 2026 to Takashi Tada (Town Planner):

... "the applicant may not necessarily be tied to the usual decision criteria by the Planning Board and ZBA. Under the Telecommunications Act 1996 and related case law, the applicant may bring forward data with respect to a significant gap in coverage with no feasible alternative locations for the tower and demonstrate that a denial of either a special permit or a variance would have the



effect of prohibiting wireless service in the area. The boards can take that evidence into consideration when issuing decisions on this type of application.”

TowerCom respectfully submits:

- Compliance with setback requirements would eliminate the technically viable locations on the property that would require similar consideration;
- The inability to construct the facility would prevent the Town, School District, and residents from realizing the public safety and connectivity benefits of improved wireless infrastructure.

This hardship is not financial alone but relates to the functional inability to provide necessary telecommunications services.

E. No Substantial Detriment to the Public Good

The requested relief may be granted without substantial detriment to the public good, as:

- The facility has been sited to **minimize visual impact** and is not located within 500 feet of any other abutting parcel; the tower is approximately ¼ mi. from the school building
- The design avoids interference with **public safety communications**, as confirmed through coordination with the Patriot Regional Emergency Communications Center;
- The unmanned facility generates **minimal traffic, noise, and environmental impact**; and
- The project provides **enhanced emergency communications capability**, which directly benefits the public.

F. Consistency with the Intent of the Zoning By-Law

Granting the requested relief will not nullify or substantially derogate from the intent or purpose of the Groton Zoning By-Law.

Overall, the proposal:

- Advances the By-Law’s intent to support necessary infrastructure while minimizing potential impacts;
- Encourages co-location by other wireless carriers;
- Is consistent with state and federal policy promoting reliable wireless communications; and
- Has been developed through collaborative engagement with Town and School Board officials, reflecting local planning priorities.



In sum, TowerCom respectfully requests the Board's consideration of its petition at the Board's upcoming June 2026 hearing.

Sincerely,

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Encl: Exhibit A – Zoning Drawings dated 03/30/2026
Exhibit F – Certification of Abutters List, dated 04/03/2026
Exhibit I – T-Mobile Letter of Interest

Cc: Takashi Tada, Town of Groton
Sherry Kersey, Groton Dunstable Regional School District