

Correspondence received by the Concord Select Board
Week Ending – September 30, 2024

1. Pierce Brown 100 Newbury Court
2. Edward Sinni 21-4 Concord Greene
3. Alisha Boyajian Citizen Petitioner
4. Michael Mahoney 29 Concord Greene

I strongly urge the Select Board to appoint a Study Committee for the RTE issue at your upcoming meeting on September 30. I was present at the SB Meeting in November 2023 when it was originally passed and was astonished at the shortness of the discussion time allowed prior to the vote on such a serious issue for so many taxpayers. I also feel that the RTE causes divisiveness

among taxpayers in our town. A measurable line now exists which separates those with lesser valued houses from those with higher valued ones and mandates different treatment for the two classes. It is too soon yet to see what the ultimate effect of this polarization will have. Fairness has always been one of Concord's lodestars. All the more reason to appoint a Study Committee to fairly and fully explore RTE in all its aspects.

Pierce B. Browne

100 Newbury Court

Concord, MA

Dear Selectmen,

My name is Edward Sinni and I reside in Concord Greene. I would like to offer my support for the proposed and soon to be voted on, Concord Tax Adjustment Proposal. I am a senior citizen on a fixed income and with a disability that preempts my working further. If this proposal is not voted to be implemented it may mean my moving away. Given that I down sized here in Concord and remained here purposely as many of us do, my vote is meant for the positive reason of my commitment to our Town overall and not just my own personal financial advantage.

Having said that, I hope and support the Selectmen's vote to implement this very important change which brings equity to residents' taxes. Thank you for your attention,

Edward Sinni

21-4 Concord Greene

Concord, MA 01742

Dear Town Manager and Members of the Select Board,

Thank you for continuing to work toward responsibly increasing the cellular network capacity in Concord. I am following meeting minutes and hope the landfill RFP will soon be issued. I do understand that the RFP has already been issued for the Umbrella site and that there is opposition from some building occupants and surrounding neighbors.

At the risk of being overly repetitive, I am writing to suggest that the town continue to pursue the DPW yard at Keyes Rd. I am well aware of the obstacles presented at Keyes Rd and that there may also be some resident and employee opposition to the site, but I would like to offer the following points:

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- Based on public meetings and comments, it seems that Public Works is likely to seek a new, bigger site for their operations. This means they would not have to manage for long, the loss of about 50 square feet of space to a tower facility or any discomfort or concerns around office space being too close to the tower.
- A new tower would not likely be built and operating for at least 18 months. If the tower is up and running for a short period before DPW yard is able to vacate, a variety of accommodations for concerned employees could be made, such as work-from-home options
- or alternative work space at individual requests or possibly signal-shielding window covers. Some vehicles could be temporarily parked at alternate locations to free up maneuvering space if needed.
- The likely possibility of selling the Keyes Rd parcels for future housing development does not have to exclude a tower.
- The town could carve out a very small section to remain under town ownership for a multiprovider monopole facility. The tower could be built and operating long before any houses are built (I would guess at least 5 years, maybe 10 if the tower ball gets rolling now). When houses are eventually built, the tower would be pre-existing and

- visible. Prospective buyers will obviously have the choice of whether to purchase those homes, unlike scenarios where antennas are hidden in cupolas in the middle of existing neighborhoods. I personally wouldn't buy a house in very close proximity to a cell tower, but many people would. Various members of town boards and offices have argued that they do not believe cell towers affect property value. Lastly, future housing development is only theoretical and plans change. Our need for improved cellular capacity has been described as an immediate, definitive priority.
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- The Keyes Rd site is
- the only
- viable location in Concord Center to offer at least some distance from homes and schools. The town, in good faith, could say they have done the very best possible to balance community need and safety in the thickly settled town center. Resident opposition would be dramatically diffused.
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As a cellphone-user, concerned parent, wireless safety advocate, and resident who is invested in the vitality and well-being of our community, I continue to support a new wireless communication facility in the DPW lot on Keyes Rd. I have attached the memo I worked on with a group of residents in preparation for the 2024 Town Meeting. We decided to pull the article at the last minute to focus only on the landfill since we believed at the time that the TriCon option was a done deal, however, we are very confident the article would have received enough votes to pass.

I hope the Keyes Rd option remains a discussion point for the Town Manager's office and the Select Board.

Thank you,

February 12, 2024

TO: Town of Concord MA, Select Board

FROM: Alisha Boyajian, Citizen Petitioner

SUBJECT: Article 39 -Citizen Petition: Citizen Support for a New Cell Tower Located at the Public Works Parcel at Keyes Road

This memo is in response to the Select Board Chair's request for abbreviated information regarding Annual Town Meeting Warrant Article presentations. I am putting forth Article 39 with the support and input from a group of residents who are interested in supporting the town in improving cell coverage as quickly as possible, while minimizing negative impacts on the community.

History of the 141 Keyes Rd Site:

In December 2006 Omnipoint/T-mobile applied to site a wireless facility in the DPW yard at 141 Keyes Rd. Initially the Concord Historical Commission moved to support the application, but after some community opposition, the Historical Commission retracted their initial support. The Historic Districts Commission denied the project a certificate of appropriateness on 2/1/07. The tower application did not receive permits after this certificate denial.

In early 2019, the town issued a Request for Proposals for 141 Keyes and received two proposal responses from tower building companies, Wireless Edge and US Wireless. The proposals included a variety of multi-provider facility designs, including a stealth monopole, and a few options for exact site location suggestions within the parcel. The Town declined both proposals.

Almost two years ago, during the [Select Board meeting on March 7, 2022](#) the assistant town manager presented the results of a balloon test. Verizon performed the test on December 10, 2021, to mimic the viewshed of a 112 ft tower at 141 Keyes Rd. The results were minimal to no visual impact on surrounding areas, including the viewshed from the Old North Bridge (**see Attachment A**). However, the assistant town manager stated that Verizon preferred a location with less public scrutiny and was pursuing an agreement with an undisclosed, private entity.

Coverage Potential from a 141 Keyes Rd Tower:

In 2003 the town hired an RF engineer to do an [in depth study](#)¹ of the existing and potential wireless infrastructure in Concord. Regarding the DPW Yard at 141 Keyes, the report states, “A new tower at this site could serve the Town Center very well for a number of carriers.” While the report did not include a coverage map showing the Keyes Rd site in isolation, it did include a few modeled coverage maps depicting potential coverage with Keyes Rd, in addition to other existing and potential sites. **See Attachment B** for one example that depicts coverage reaching from Keyes Rd, through the downtown area, and to most of CCHS campus.

In 2018, the Town commissioned a different independent RF consultant to create projected Verizon coverage maps for a few sites in Concord, including the DPW yard on Keyes Rd. The maps were presented at a Select Board meeting on 1/22/2018 and showed great coverage for the downtown area extending toward Rte 2 to just past Laurel Street (**See Attachment C**).

Most recently, Verizon submitted to the Town a modeled coverage map depicting a 90 foot tower at 141 Keyes Rd. This map is not date stamped, but it probably relates to the Verizon assessment discussed at the Select Board meeting on 3/7/22. The map shows good coverage for the downtown area that extends toward Rte 2, all the way to parts of the CCHS campus (**see Attachment D**).

After reading a [2019 FCC report](#),² and consulting with both an RF engineer from the University of New Hampshire and a telecommunications lawyer experienced in reviewing wireless facility applications, we learned that projected coverage maps are not 100% accurate. The RF report commissioned by the town in 2003 states, “Computer estimated coverage analysis is not an exact science”. The maps for any one tower site will look different as the input parameters, such as signal strength, tower height, and transmitted frequency, are changed. The modeled maps are useful tools in assessing potential sites but they do not provide definitive information on how well a site will actually perform once built.

If the Town would like a more reliable assessment of the actual coverage that would be achieved by a Keyes Rd tower, they may choose to send up an antenna during a balloon test to the anticipated tower height and measure real signal strengths in the desired coverage area. This was suggested as an option in the 2003 RF report commissioned by the Town and by the RF engineer we recently consulted.

¹ <https://concordma.gov/DocumentCenter/View/15044/Evaluation-of-Wireless-Deployment-Issues-2003>

² <https://www.fcc.gov/document/mf-ii-coverage-maps-investigation-staff-report>

If the Town chooses to rely *only* on computer models, the combination of data provided from the 2003 RF study and coverage maps, the RF coverage maps presented at the January 2018 Select Board Meeting, and the most recent coverage map created by Verizon indicate that a tower located at 141 Keyes Rd would provide the improved coverage our town is seeking.

Addressing Weaknesses of a Tower Site at Keyes Rd:

Our zoning bylaws have a 1,000 ft setback from schools and homes for newly constructed towers to “minimize any adverse impacts on the residents of the Town... with regard to the general safety, welfare and quality of life in the community;” (Zoning Bylaw for Personal Wireless Communication Facilities 7.8.1(e)). While it would not be possible to achieve the full 1,000 ft setback in the DPW Yard at Keyes, the parcel offers the only opportunity in Concord Center to achieve more than 700 feet from schools and homes, with just a couple single family homes brushing against that 700 feet. Comparatively, one of the church cupolas in town is 230 feet from the one preschool, 400 feet from a second preschool, and has more than 25 homes in that same 700 foot radius. Concerns around RF tower emissions decrease with distance. Attempting to place the tower at the greatest distance possible from schools and homes is worthwhile, even if the 1000’ setback can not be fully achieved.

As for encroaching on priority habitat and wetland buffers, the proposals submitted in the past offered site options within the already disturbed and paved areas of the parcel and outside of the critical wetland buffers. Such site options would not further disturb sensitive areas. Some previously-suggested areas would be outside all areas of wetland buffer concern. Furthermore, the Town approved two cell towers at Great Meadows that reside within areas defined as estimated habitats of rare wildlife and priority habitats of rare species (**see Attachment E**).

Concerns about impacts on historic districts are understandable, but at this point in time, the much broader community demand for cell service is likely to outweigh viewshed objections. Demonstrating these changing viewpoints is the fact that a balloon test carried out in 2021 barely raised an eyebrow when presented to the National Parks Service by the assistant town manager, while the same balloon test performed in 2007 evoked a stronger negative reaction from residents, the public and the Concord Historical Commission. There are also more options today for camouflaging towers so they blend into surrounding landscapes. Testimony presented at the Cell Tower Listening Session was focused on safety, commerce and convenience, not historical appropriateness. The political and social pressures of 16 years ago are not necessarily the same pressures that influence community choices today.

An affirmative vote at Town Meeting would demonstrate strong community support for a Keyes Rd. tower, which would help move the application through various stages of permitting. For example, a representative from the State Historic Commission told me that community support is factored into decisions around approvals. This is likely to hold true for other local and state offices and boards involved in tower permitting. Community support would also bolster the Town against site opposition, as well as provide the wireless companies with more confidence when they apply for the site.

Benefits of the 141 Keyes Rd Site:

In addition to being an adequate site for improving cellular coverage and providing the most distance possible from schools and homes in such a thickly settled area, the DPW yard at 141 Keyes resides in the wireless communication district identified in our zoning bylaws. This will be looked upon favorably in the permitting process.

In addition, the parcel has minimal public foot traffic and a tower will have less community impact where the site is already paved and has housed equipment and vehicles for years. In other words, a tower in the public works yard would not be out of place.

Most importantly, the Keyes Rd parcel has the benefit of being town-owned. This provides more transparency and control over the lease terms and site development. The Town is highly motivated to improve cellular coverage in the interest of public safety, yet we seem to be waiting for the private sector to provide solutions. There is little to no visibility into private negotiations. Pursuing municipal sites shows the public that the Town is serious about improving service, and offers more predictability on the implementation timeline. Many towns in MA and across the US, including Lexington, MA, prioritize town-owned sites in their wireless ordinances.

An affirmative vote on Article 39 will help our community move forward with improving cell coverage with confidence and consideration for all members of the community. The Town has been studying wireless siting for more than 20 years, and more recently we have been waiting for years for private parties to act. Choosing sites via Town Meeting and establishing a deadline will help propel us toward more timely, appropriate solutions.

Attachment A-Photo of balloon test taken from Old North Bridge on 12/10/21 and presented at Select Board Meeting on 3/7/22:



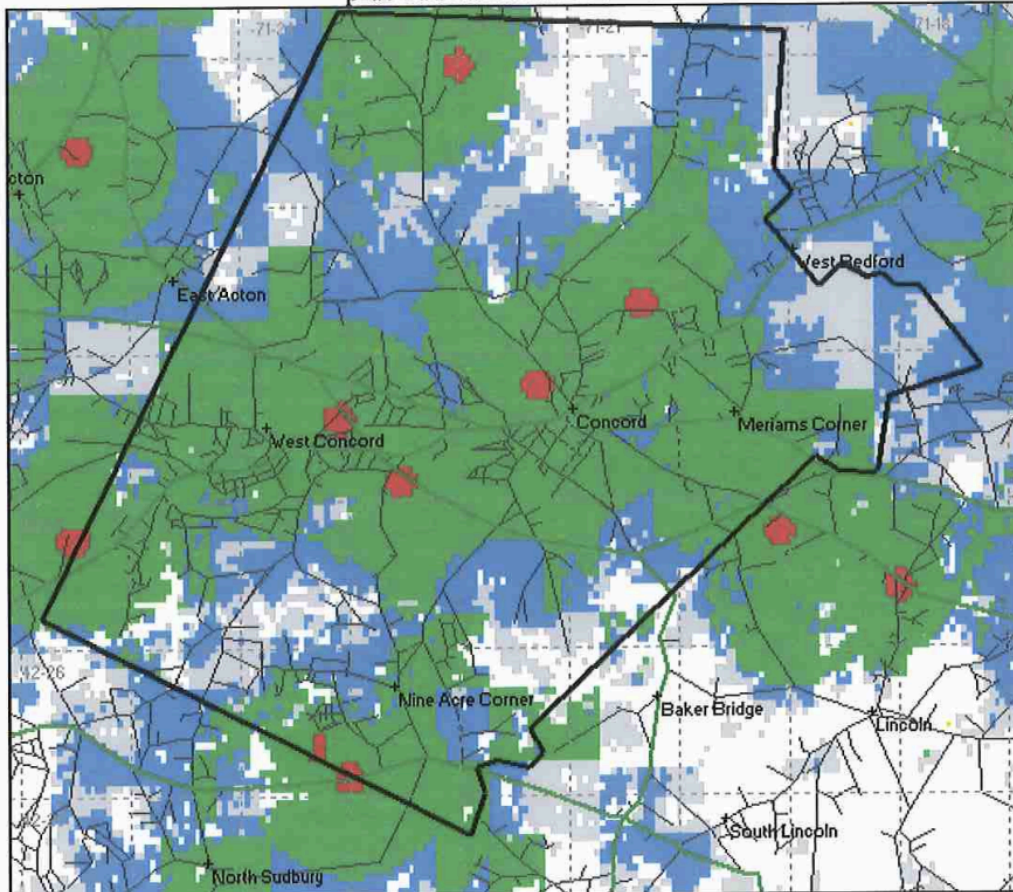
Concord Select Board - March 7, 2022

Attachment B from RF study commissioned by Town in 2003:

Broadcast Signal Lab

Concord Wireless Siting Options

= POTENTIAL COVERAGE =
 based on T-Mobile's layout as calculated by BSL,
 plus additional site locations



Legend:	Red	Location of site
	Green	Robust Coverage
	Blue	Reliable Coverage
	Grey	Uncertain Coverage

Location of sites depicted:

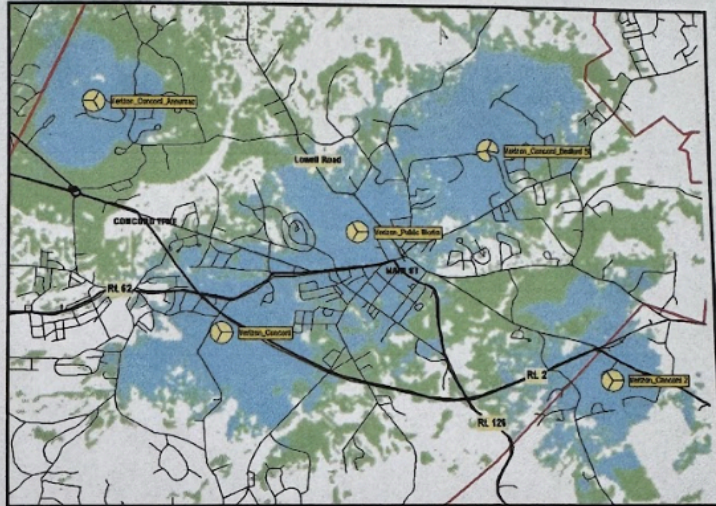
Northwest	533 Main St / Acton
Northeast	75 The Great Road / Bedford
Southeast	23 Cambridge Turnpike (Morrissey Property) / Lincoln
Southeast	131 Cambridge Turnpike (Tracey's Towing) / Lincoln
Emerson	Emerson Hospital / Concord
West	200 Baker Ave / Concord
Southwest	142 North Rd / Sudbury
Southwest	30 Knox Trail / Acton

Added to initial T-Mobile Plot

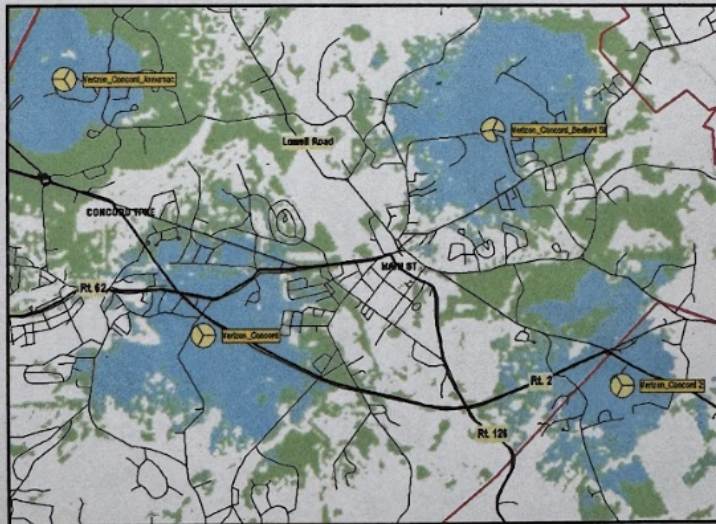
East	509 Bedford St (Waste Water Treatment Plant) / Concord
North	1400 Lowell Rd (Middlesex School) / Concord
Center	Keyes Road / Concord

Attachment C presented January 2018 at Select Board Meeting:

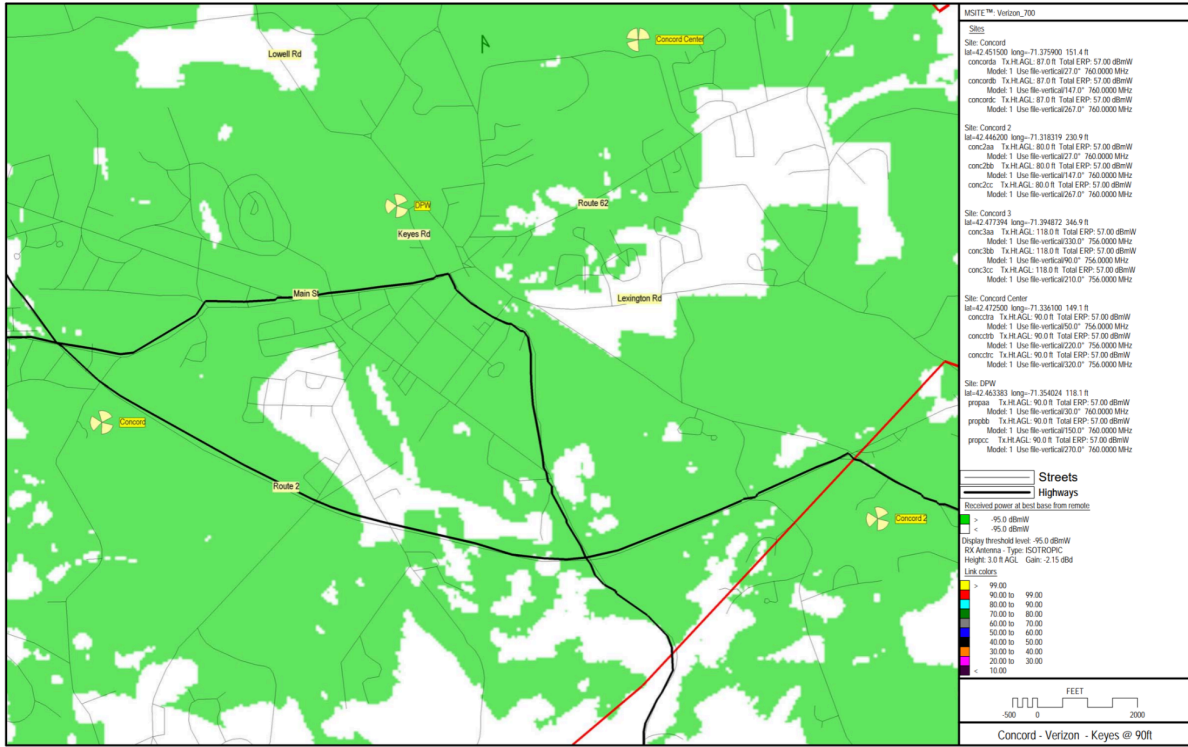
Existing Verizon
Concord Coverage
with Public Works
Added



Existing Verizon
Concord Coverage



Attachment D-coverage map of Keyes Rd tower submitted to the town by Verizon:



Attachment E from Town of Concord, GIS map 2024—Great Meadows towers:



Michael Mahoney

29 Concord Greene
Concord, MA 01742

Sept. 27, 2024

Concord Select Board
Concord, MA 01742

Dear Select Board:

First of all, I would like to take the time to thank you for supporting the Residential Tax Exemption in Concord. It makes a *huge* difference for those that need it most! As a resident of Concord, I believe this initiative is essential for enhancing the quality of life for our families and fostering a more equitable environment.

In recent years, we have seen a significant rise in property taxes, which has placed an increased financial burden on many, particularly those on fixed incomes and young families trying to establish roots in Concord. Through continued support of the residential tax exemption, we can alleviate some of this pressure, allowing residents to invest in their homes and neighborhoods rather than struggling to meet rising costs.

I would like to share with you that I am a realtor and work extensively with clients throughout Greater Boston (including many in Concord). I can tell you, from personal experience, that having a residential tax exemption in place can make the difference between being able to remain in Concord as well as being an incentive for new families to move into our area, contributing to a vibrant, diverse community. A more affordable housing market can lead to increased homeownership rates, fostering stability and long-term investment in our neighborhoods.

Many will say that the difference in taxes will not determine whether a person can afford Concord or not. I can tell you as a real estate professional that it absolutely does. When a person is qualifying for a mortgage the key factors that go into that calculation are principal, interest, **taxes**, and insurance (otherwise know as PITI). For somebody that is on the cusp of being able to afford Concord or not, taxes can make the difference between qualifying for the mortgage or not qualifying.

There is so much concern these days (and rightfully so) around the lack of affordable housing and that more needs to be done to ease the situation. This will only help.

I understand that many will say that there may be homeowners who are “house rich” and “cash poor”. While this, to some extent, may be true it does not hold true for most of the homeowners who own multi-million dollar homes.

Moreover, it’s evident that many more individuals with limited financial means live in moderately priced homes and would significantly benefit from the tax relief a residential exemption would provide—potentially allowing them to stay in Concord—compared to those living in multi-million dollar homes who are struggling to pay their taxes.

Thank you for your attention to this important matter. I hope you will continue to support the residential tax exemption and help make our community more accessible, vibrant, and welcoming for all.

Sincerely,
Michael Mahoney