

Village Preservation Adverse Effects at Proposed 5G Tower Site February 21, 2024

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SITE NAME: MN-02-GF0918 A

RE: Addendum to FCC Form 620, prepared by EBI Consulting, February 15, 2024

COMMENTS:

This Link5G tower is proposed to be located across the street from both the Gansevoort Market Historic District (boundary is approximately 15 feet north of the proposed tower site) and the Greenwich Village Historic District (boundary is approximately 50 feet east of the proposed tower site), and would have adverse effects on several historic resources located within the bounds of these historic districts, both of which are NYC Historic Districts and are listed on the National Register of Historic Places. Additionally, an NYC Individual Landmark, 110-112 Horatio Street (F. W. Devoe & Co. Factory), is located less than 165 feet west of the proposed location. This individual landmark is located on the same side of the street as the proposed tower, which would directly and negatively impact sightlines to the landmark site.

Located directly across the street from the proposed tower site and within the Gansevoort Market Historic District are 97-103 Horatio Street, two Romanesque Revival style warehouse buildings designed by noted Brooklyn architect George P. Chappell and built in 1899-1900 for former Mayor Hugh J. Grant. Their first tenants were lithography and printing companies; beginning in the 1950s, the buildings' occupants shifted to the produce, poultry, and beef industries, typical of warehouses in New York City's "Meatpacking District" during the time period. In 1980-82 the buildings were converted into apartments, and, as confirmed in the NYC Landmarks Preservation Commission designation report, they retain significant historic fabric and Romanesque Revival architectural details at the exterior facades. All would be adversely affected by a 32-foottall tower sited directly across the street, and viewed in conjunction with the historic buildings from the south.

Directly across the street to the east is 791-795 Washington Street (aka 90-92 Horatio Street), an intact 1871 brick-and-stone apartment house located within the Greenwich Village Historic District. The ornate corner facades feature brownstone quoining, segmental-arched projecting stone lintels atop multi-lite windows, and original iron fire escapes. The sightlines to all of these intricate details would be obstructed by the 32-foot-tall tower.

Village Preservation does not agree with the claim made in the original EBI Consulting (EBI) submission packet that "visibility of the pole will be mostly obstructed by intervening buildings and the mature foliage present along the streets." The proposed pole would fall squarely in the line of sight into both the Gansevoort Market and Greenwich Village Historic Districts and would be 100% visible from many vantage points within the districts, with no intermediary buildings to obstruct sightlines. While street trees are present on this block, the lack of foliage between approximately October through March precludes them from offering any reduction in visibility for at least half the year. Even when in full bloom, trees do not by any means completely obscure visibility, and are by their nature impermanent and subject to potential removal or loss. No further arguments were put forth in the EBI addendum letter of February 15, 2024, to quell these concerns.

In response to consulting parties', members of the public, and the NY State Historic Preservation Office's assertions that a tower sited at this location would have numerous adverse effects on surrounding historic resources, Boldyn has elected to remove the LED display screen from this proposed tower. While the removal of a flashing LED screen is a welcome improvement, it does not do enough to mitigate the impacts of the presence of an overly large metal tower in the residential-scale historic neighborhood. The shape, size, and finish of the tower are all incompatible with the surrounding streetscape and neighboring historic resources, and removal of a relatively small LED screen does little to alleviate this negative visual impact.

While the extent or effectiveness of Wi-Fi and 4G/5G cellular coverage are not directly considered as part of the Section 106 review process, we find Boldyn and EBI's claims that coverage is specifically needed along this particular stretch of Washington Street to be dubious. No convincing argument has been made as to why two Link5G towers are required within this two-block span (the proposed sites, 100 Horatio Street and 100 Jane Street, are approximately 400 feet apart) of a quiet, residential area of the far West Village that already has full access to internet and cellular networks.

If a compelling argument is made as to why two towers are absolutely unavoidable at these locations — again, we do not currently believe this to be the case — then the oversized, unnecessarily intrusive design of the structures should be reconsidered. Surely there are options that are more visually sympathetic to and compatible with the historic style and scale of the streetscape and the adjacent Gansevoort Market and Greenwich Village Historic Districts.

CC: New York State Historic Preservation Office
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NYS Senator Brian Kavanagh
NYS Assemblymember Deborah Glick
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