

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

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**SITE NAME:** MN-02-GF0918\_A

**ADDRESS:** 100 Jane Street

**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 the Greenwich Village Historic District – which is both an NYC Historic District and listed on the National Register of Historic Places – and would have adverse effects on several historic resources located within the bounds of the historic district.

The assertion made by EBI Consulting (EBI) in their February 15, 2024, addendum letter that the tower will not adversely affect historic fabric, due to its proposed location fronting a modern, non-contributing building, does not take into account the full conditions of the site and its surroundings. A tower at this proposed location at the northwest corner of West 12th and Washington Streets would impede sightlines to several buildings within the Greenwich Village Historic District, the boundary of which begins on the east side of Washington Street. Of greatest concern is that it would directly and negatively impact views of 767 Washington Street, located diagonally across the street, which is the lone extant example on that block of the early 19th century architecture so emblematic of the Greenwich Village Historic District.

Per the NYC Landmarks Preservation Commission's designation report, the three-story house at 767 Washington Street was erected in 1842 and has the gable end and general proportions of a much earlier Federal house. These significant historic details would be obscured by the width and height of the Link5G tower from multiple viewpoints. The tower would also cut off the direct sightline to 773-775 Washington Street, a two-story garage built in 1924-25 at the northeast corner of West 12th and Washington Streets, with intricate Flemish bond patterned brickwork.

The introduction of the modern, bright metal materiality of the tower would also be in stark contrast to the adjacent cobblestone street bed of West 12th Street. Belgian block pavers were historically found throughout Greenwich Village's streets, and this original paving remains along a number of the east-west cross-streets on the far west side of the neighborhood. The metal tower would be out of character with this context and would adversely affect one's visual understanding of the historic paving.

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 Jane Street and 100 Horatio 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 Greenwich Village Historic District.

CC:     New York State Historic Preservation Office  
         NYS Senator Brad Hoylman-Sigal  
         NYS Senator Brian Kavanagh  
         NYS Assemblymember Deborah Glick  
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         West Village Residents  
         Westbeth Corp HDfC  
         Horatio Street Arms Inc  
         Left Bank Apartment Corporation

