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<https://newyorkers4wiredtech.com/>

Commenting on Sites within Manhattan Community Board 7 (mCB7)

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**Re: Comments submitted for consideration in the matter of a Section 106 Review for
Link5G Wireless Telecommunications Facility at
2800 Broadway and W 108th St, Manhattan, NY.
Site name: MN-07-120401_A (EBI reference # 6123006708)**

In accordance with your email instructions, I am uploading to the Consulting Document Portal the following comments for the matter referenced above.

Summary: The Link5G wireless facility proposed to replace an existing kiosk at this site will introduce intrusive visual elements that will create “visual adverse effect.” The placement of a massively oversized 32’3” wireless tower with an ultra-modernistic design will diminish and alter the setting (including the landscape) in the “area of potential effects”(APE). As discussed herein, the setting is clearly a character-defining element of the landmarked Manhasset Apartments that are eligible for listing on the Federal Register. (The Manhasset is directly across Broadway from the project site as shown in Image 1 below.)

The proposed monopole will be placed approximately 25’ north from the east sidewalk curb at the intersection at West 108thth Street on this tree lined boulevard. (This placement will almost align with the entrance doorway to Dunkin Donuts, a commercial storefront.)¹ The tower will become the dominant element directly marring the viewshed looking north “up” Broadway at the National Register of Historic Places eligible Manhasset Apartments (at 2801-2825 Broadway LP-1947). The Manhasset directly abuts the Riverside Drive-West End Historic District to the west.

¹ See Overall Site Plan Map on page 92 of Form 620



Image 1 – Looking north on Broadway from West 108th St towards Manhasset Apartments which occupy entire west block front. The red arrow shows the existing LinkNYC kiosk, which is the proposed Link5G site location. Tower height will reach to just below fourth floor windows of the 113-year-old Manchester Condominium which is the “backdrop” to the right. (Source: Google Maps October 2017.)

While the applicant has asserted “no effect” for every other historic district and resource in the APE, the applicant’s findings for Riverside Drive-West End Historic District and Extension II along with the Manhasset Apartments was “no adverse effect.”² This is no small difference.

Contrary to the erroneous assessment provided by the applicant in the Form 620, the Link5G tower will:

1. Offer significant, visual adverse effects when looking towards Manhasset – “one of the few buildings that can be viewed from a distance” in Manhattan - particularly when looking towards the Manhasset from the south along both Broadway and from Straus Park at West End Avenue.
2. Be fully visible from most residential windows of the Manhasset looking to the Southeast. The supposed “visual buffers” described as “mature vegetation and utility infrastructure” most certainly do **not** entirely block the view of proposed tower.
3. Contrast starkly against “backdrop” of the cream and white exterior of the 113-year-old Manchester building at 255 West 108th Street, which was completed in 1910. The massively sized, out of context brushed aluminum skin of the modernistic designed

² Here is applicant’s supporting narrative regarding effects on the Manhasset from pages 63 and 64 of the Form 620: (italics, bold and underlining added) “The property is located within the APE for visual effects, 100 ft. northwest of the Subject. The proposed installation will be visible from the historic resource especially during leaf off seasons however, the surrounding area contains visual buffers such as mature vegetation and utility infrastructure as well as a backdrop of multiple story buildings. These elements along with the installation design serve to **minimize** the project’s visual impact. The installation would not introduce a dominating visual element or result in a perceptible change to the viewshed of the resource. As a result, the proposed project will not diminish the visual characteristics of the resource’s setting. The proposed project will have No Adverse Effect on the resource.”

antenna cannister and pole will be dramatically highlighted by the Manchester's 3rd floor marble colonnaded balconies and ornately carved fourth floor window cornices facing Broadway.

4. Introduce a dominating new piece of street furniture that is taller and wider than any other utility infrastructure in the immediate viewscape.

The comments and accompanying photographs included herein will address each of the applicant's assertions as listed above:

1. The Applicant's assessment of no adverse (visual) effect is only from the Manhasset and ignores the adverse effects Link5G tower will create when looking towards the Manhasset:

The applicant acknowledges that the proposed 32'3" monopole will be visible from these subject resources (specifically the Manhasset) but seems to be unconcerned about effects upon visibility to the Manhasset.

When, in fact, the Landmark Designation Report describes the unique viewshed characteristics when looking towards the Manhasset that extend southward four full blocks:

"The Manhasset is a particularly notable and distinguished example of the Beaux-Arts style in New York City. The facade has characteristic three-dimensional sculptural detail and is crowned by a steep mansard roof with slate shingles and large metal dormers. Especially monumental, the roof is the focal element of the highly visible building - one of the few New York City apartment buildings that can be viewed from a distance. The open space of Schuyler Square (Strauss Park) and the curve of Broadway extending from West 103rd Street to West 108th Street place the Manhasset at the apex of an impressive vista."³

Hence, for pedestrian and automobile traffic (as well as *from* windows of buildings to the south of the Project Site) will have viewscapes looking north to The Manhasset that will be diminished by a three-story tall, broad circumference wireless tower mounted on the southeast corner sidewalk at West 108th and Broadway. And, as noted above these viewsheds are a distinguishing characteristic of The Manhasset.

2. The proposed 32' Link5G tower will be fully visible year-round looking to southeast from most Broadway facing windows of The Manhasset...

The supposed "visual buffers" described as "mature vegetation and utility infrastructure" do **not** entirely block the view of proposed tower Project Site from the Broadway facing windows of The Manhasset. While some views *from* the lower three stories of The Manhasset may be partially blocked during the six months of the year when leaves are on trees, this is an 11-story building. Meaning that the leaves will not block views from the other eight upper stories of the Manhasset.

The existing vegetation consists primarily of mature trees along the sidewalks and a combination of trees and low shrubs in the center median Broadway Mall that runs the length of the block. However, as can be clearly seen in Image 2 below there are no trees on the east side sidewalk nearest the project site. The approximately 4" diameter top of the tapered pole of the nearest streetlight/traffic signal is only about 1/8

³ MANHASSET APARTMENTS, 2801-2825 Broadway, 301West108th Street, and 300 West 109th Street, Borough of Manhattan. Built 1899-1901, architect Joseph Wolf; enlarged 1901-1905, architects Janes & Leo. Designation List 274 LP-1947; Landmarks Preservation Commission, September 17, 1996, page 4. <http://s-media.nyc.gov/agencies/lpc/lp/1947.pdf>

Ver. 5.1

of the 34" diameter of the proposed Link5G pole. Thus, the proposed wireless tower will be taller than all the trees and the streetlights – and substantially wider.⁴

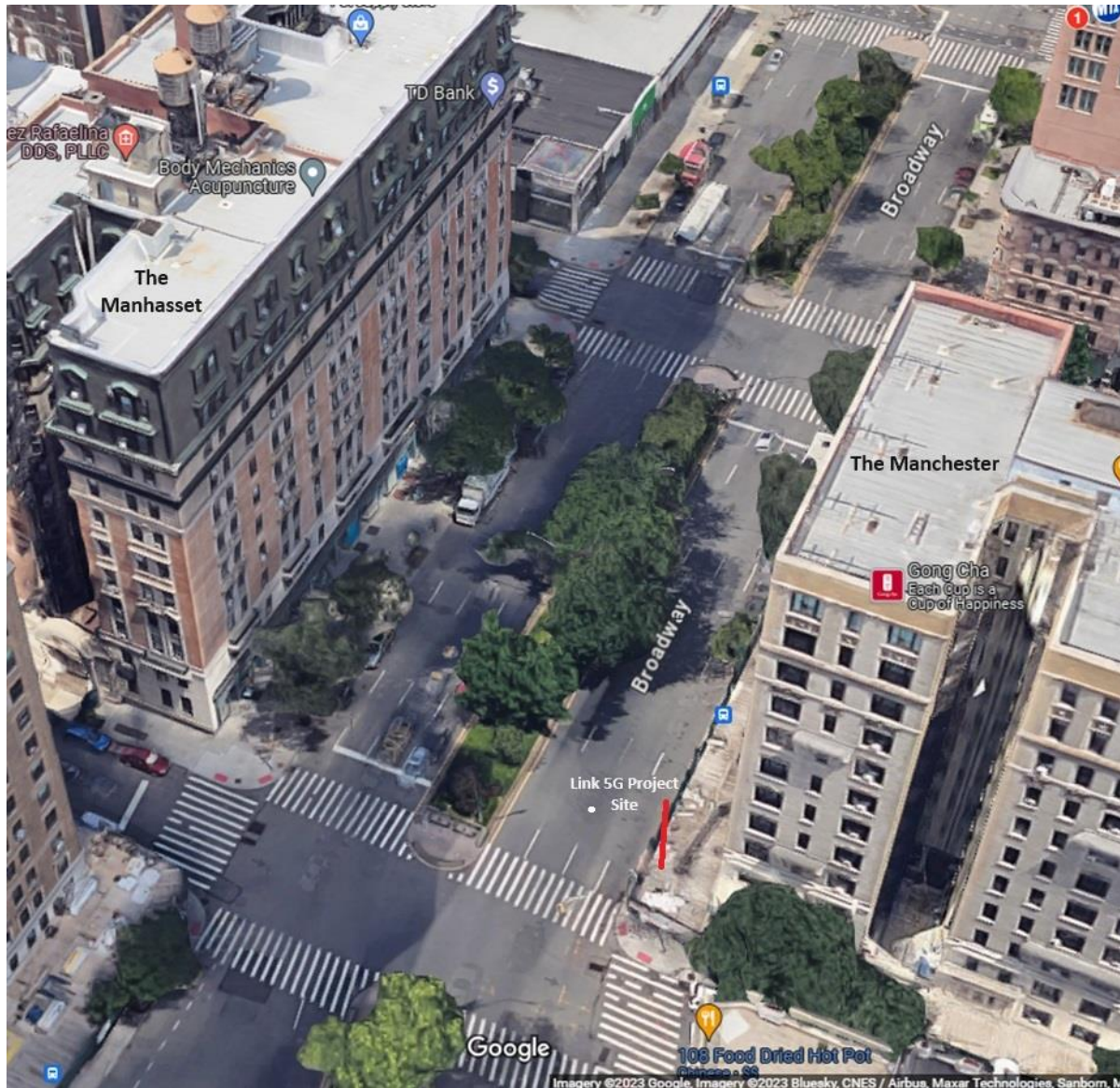


Image 2 - this 3-D aerial view shows street vegetation (mostly trees under 30 feet tall) along west side sidewalk on Broadway directly adjacent to The Manhasset, in the center island “Broadway Mall” and on northern part of the east side sidewalk. The red arrow shows the approximate location of project side for proposed Link5G tower. Note that there are NO trees directly adjacent to the Project Site.

What the description provided by applicant (as per footnote #2 on page 2 above) also fails to address is the impact that the Link5G tower will have upon the Broadway Malls center median to the overall setting. The Broadway Malls are, in fact, a series of block-long public park spaces that run along Broadway from

⁴ As described by NYC Parks, [History of Broadway Malls](#) “During the 1980-1993 renovation of the Broadway Mall, most of the walk-through malls were converted to green malls, and many of the oak trees were replaced with other species, primarily London planetrees (*Platanus x acerifolia*). Most of the trees on Broadway date to this era of reconstruction, although some still date to the 1930s.” (Hence, the trees in this section between West 108th and West 109th dating to the 1990s are estimated to be **under 30’** in height.)

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West 60th to West 122nd Street. The original designs in 1867 to create a boulevard called “Broadway,” included median greenspaces that were modeled after the Champs D’ Élysées in Paris.⁵

- 3. The proposed 3-story tall Link5G tower will mar the setting by starkly contrasting ultramodern stainless-steel design that rises up against a “backdrop” of cream-colored lower walls of 113-year-old Manchester building.**

The Manchester at 255 West 108th Street forms an important part of the overall setting on the southeast corner at this intersection. The building was completed in 1910 (just a few years after completion of the Manhasset) and is one of the more impressive apartment buildings on Broadway. Exterior features include third floor marble colonnaded balconies on several units, oversized windows and ornately carved fourth floor window cornices as shown in Image 3 below.



Image 3 - The proposed Link5G tower (to replace LinkNYC kiosk at lower center) will rise nearly to the carved and colonnaded balcony on The Manchester (see red arrow) which was completed in 1910 just a few years after The Manhasset and is directly across Broadway (Source: Google Maps. July, 2019 – to show building without temporary scaffolding.)

Compare the description offered above to the mischaracterization by the applicant in the Form 620 which only obliquely refers to The Manchester - as a backdrop “multi-story building” of no particular distinction.

⁵ NYC Parks Broadway Malls. <https://www.nycgovparks.org/parks/broadway-malls/history>

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Given the character and age of the building, it is entirely possible, if not probable, that The Manchester will be eligible (and architecturally worthy) to be designated as a historic resource in the future, along with several other buildings - on just this block alone.⁶

4. The proposed Link5G wireless tower will introduce a dominating new piece of street furniture that is taller and wider than any other structures in the immediate viewscape.

As noted above, the proposed Link5G tower will rise to the base of fourth story windows of The Manchester at 255 West 108th Street and compete with and detract from exterior architectural embellishments on that 113-year-old building - as can be seen in the Image 3 above.

The Link5G structure will be both taller and significantly wider than the tapered streetlight visible in Image 3. Streetlights and traffic control signals at this intersection are Standard NYC DOT Octagonal Poles with extension arms. The Link5G will be more than 3 times taller than the existing LinkNYC kiosk. Note the Link5G shown below in Image 4 is NOT to horizontal scale. Rather, the widest point at the top of the cannister holding wireless antennas will be 34" while the tapered octagonal streetlight pole is only approximately 4" wide at top.

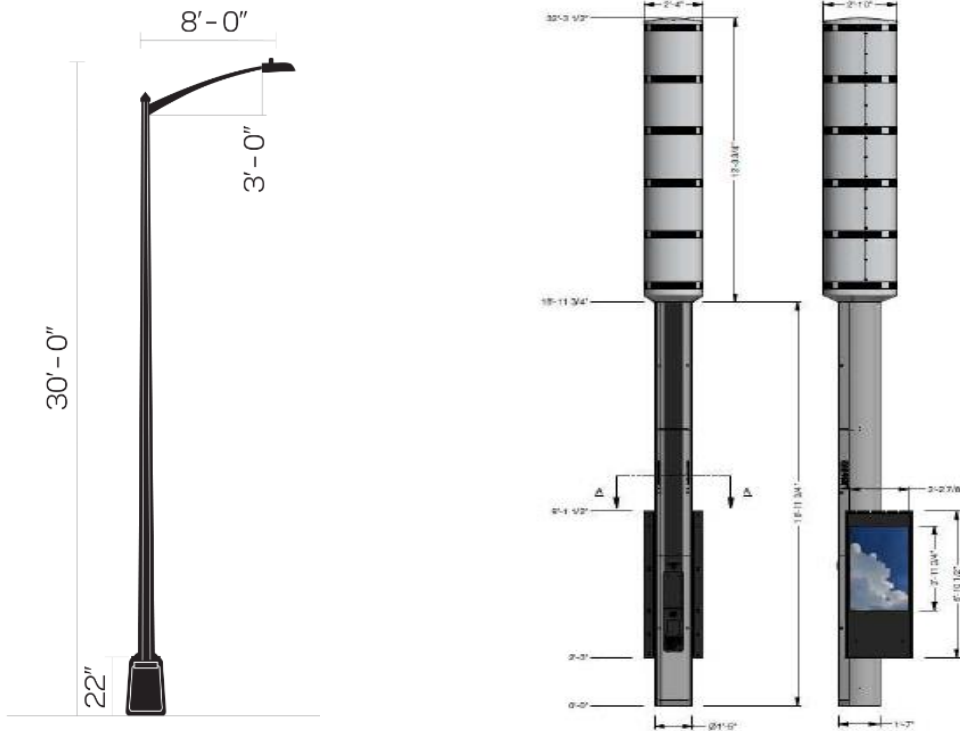


Image 4 – Dimensions of Standard Octagonal 30’ Streetlight from New York City Street Design Manual compared to dimensions of proposed 32’3” Link5G monopole (front and side views from Elevation Drawing, Form 620 on page 9.) Streetlight at West 108th and Broadway also has 12’ tapered extension arm for traffic control signals.

⁶ There are many other 100-year-old residential structures on Broadway and the nearby side streets *between* both the Central Park West and the Riverside/Upper West Side historic districts. Unfortunately, no one has - as yet - written up the designation/nomination forms.

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It is hard to imagine how the applicant might consider that this massive, modernistic polished stainless-steel structure will not dominate the streetscape and viewshed.

The Future and the Cumulative Effects of Link5G towers along Broadway

NYC DOT has worked hard with non-profit organizations and local residents to improve the streetscapes along Broadway most significantly through the restoration and maintenance of the Broadway Malls. There is hope that in coming years the next phase will be to remove all the unsightly and out of context modern street lighting and replace these with historically accurate Type-M poles that originally lined Broadway from about 1911 until at least the early 1960s, when they were subsequently replaced over time with so call existing “standard street light poles.”⁷ (Examples in original Type M poles are shown in Images 5 and 6 below.)

The precedent for the “reintroduction” of historic, early twentieth century cast iron streetlights was previously done as part of a massive reconstruction project in the mid-1990s along nearby Columbus Avenue from West 60th to West 110th Streets. It would be a calamity if historically accurate reproduction Type M poles - when they are reintroduced along Broadway - would have to compete with ultra-modernistic Link5G wireless towers. The applicant makes no effort to address the cumulative effects of these massive towers particularly in light of future potential to have them spaced mere blocks apart.



Image 5 – Looking up Broadway from 106th Street circa 1925 just a few blocks south of the Project Site. The highly ornamental Type-24 Mast poles - that were previously installed all along Broadway north of 59th Street - can be seen in center left and center right of the

⁷ NYC DOT Street Design Manual. <https://www.nycstreetdesign.info/lighting/type-m-pole>

photo. The Manhasset is out of frame to the left, but the West 108th St side of the Manchester can be seen rising beyond and above the Type -M pole at left. (Source: New York Public Library⁸)

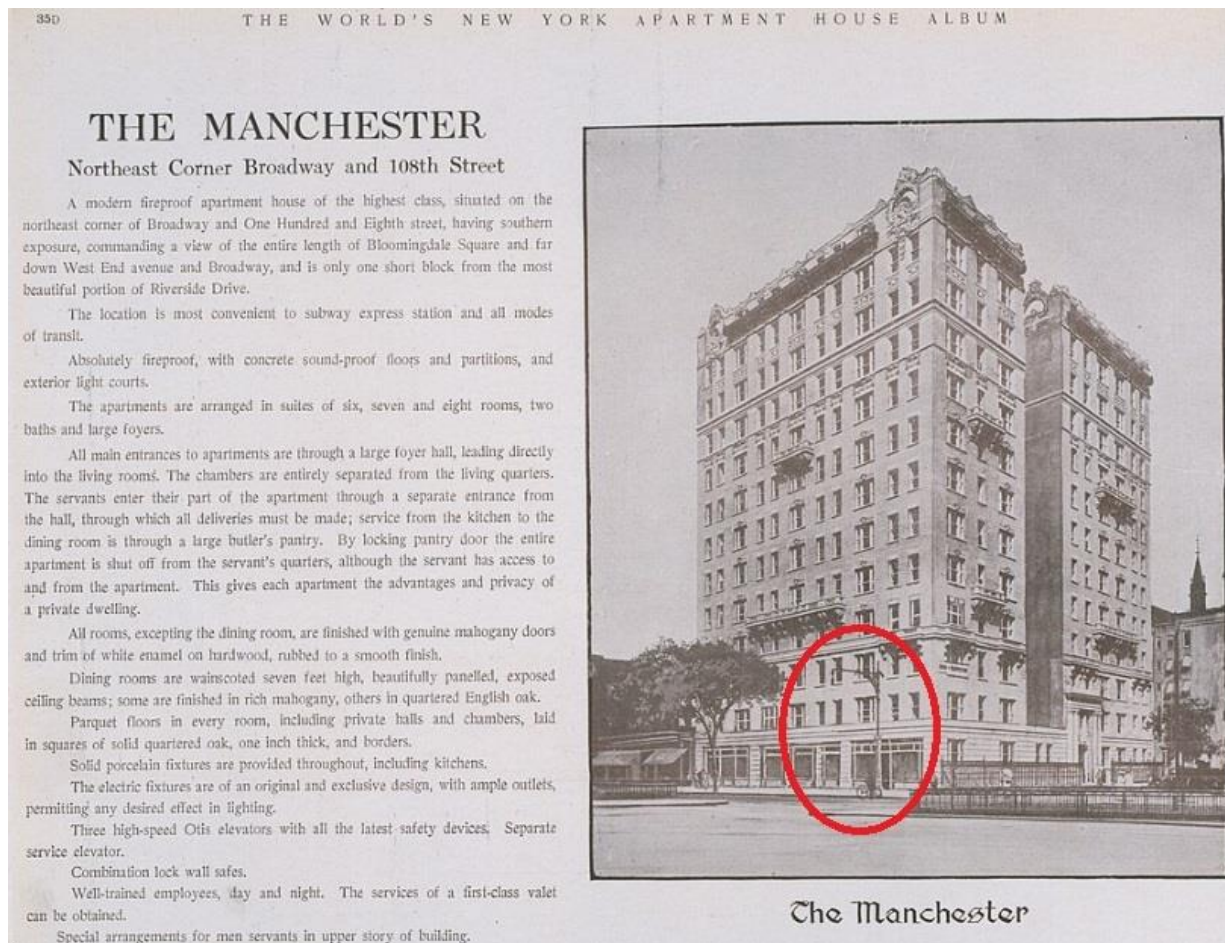


Image 6 – Advertising image of The Manchester (circa 1911) which is located directly behind proposed project site. Photo shows ornamental Type-M Mast pole streetlight where so-called “modern” standard street light fixture is located today. Community and historic preservation activists continue to push for reintroduction of historically accurate reproduction poles. (Source: NYPL as reprinted in https://commons.wikimedia.org/wiki/Category:The_Manchester,_255_West_108th_Street)

Conclusions

Accordingly, as a consulting party, I strongly disagree with and object to the mostly unsupported assertions and findings in the Form 620, which have failed to consider all the adverse visual effects that the existing Tower is having upon the setting within entirety of the area of potential effects (APE). Most specifically the effects of diminishing the view **towards** The Manhasset from points south on both Broadway and West End Avenue. (See Image 7 below). Here is how the building is described in the LPC designation report:

⁸ Manhattan: Broadway - east side, north from 106th Street, Circa 192; Sperr, Percy Loomis, 1890-1964 (Photographer) Photographic views of New York City, 1870's-1970's, from the collections of the New York Public Library.

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“The handsome limestone, brick, and terra-cotta Beaux-Arts style facades of the Manhasset continue to attract attention, creating an important anchor at the northern edge of the Upper West Side.”

This Link5G tower will introduce dominant, out of context and ultra-modernistic streetscape furniture that creates “visual adverse effects” by altering and diminishing the feeling and association of the setting in the APE where the setting contributes to the significance of the Riverside Drive - West End Historic District.

And as a final note, the Form 620 fails to address the cumulative effects that multiple Link5G towers will have upon the setting and streetscapes of the Historic District, nor has there been any attempt to fully quantify and provide location data for those anticipated future towers.

I urge the New York State Historic Preservation office to concur with a “**finding of adverse visual effect**” in this proposed undertaking.

In closing, I greatly appreciate the opportunity to submit comments. I sincerely appreciate the consideration of NYSHPO and all consulting parties in this matter and extend my thanks to EBI for coordination of this process. I welcome comments or questions.

Respectfully submitted,

Susan Peters

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Image 7 – Looking north up Broadway from intersection at West 107th towards Project Site marked with red arrow which also indicates approximate height. The tower will significantly diminish views to and from The Manhasset.