

**SUSAN PETERS**

Consulting Party for: New Yorkers For Wired Tech

<https://newyorkers4wiredtech.com/>**Commenting on Sites within Manhattan Community Board 7 (mCB7)**

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December 21, 2023

Alexis Green  
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**Re: Comments submitted for consideration in the matter of a Section 106 Review for Wireless Telecommunications Facility at 741 Columbus Avenue, Manhattan, NY.****Site name: MN-07-120527\_A (EBI reference #6123006709)**

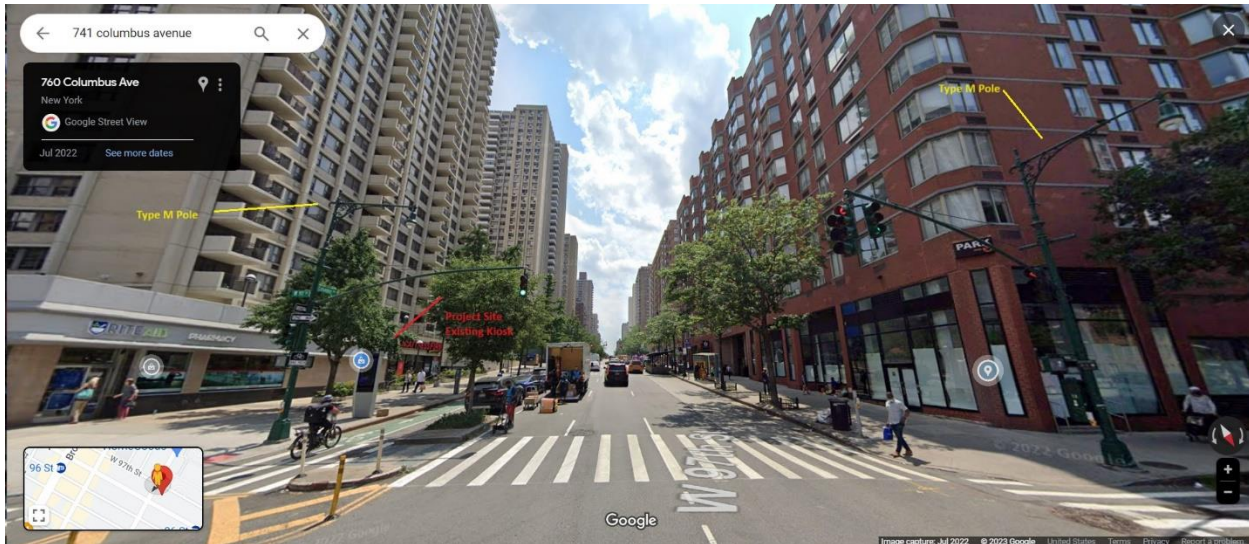
In accordance with instructions contained in your email of December 7, 2023, I am uploading to the Consulting Document Portal the following comments for the matter referenced above.

**Summary:** The proposed Link5G wireless facility (replacing an existing LinkNYC kiosk) at this site will introduce a massively oversized tower with an ultra-modernistic design that will create “visual adverse effects.” The 32’3” tower 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 feature of the nearest Historic Property that makes it eligible for listing on the Federal Register.

These comments will address the following aspects of the applicant’s assessment presented in the Form 620:

1. The applicant inaccurately asserts as sole criteria for determination of “no adverse effect” that Link5G tower must be visible from nearest resource.
2. The applicant disregards the “setting” along Columbus Avenue as a character-defining feature to adjacent Historic District that will be diminished by the Link5G tower.
  - Ornamental streetlight poles were a key element of the setting during period of historical significance - when the 9th Avenue El ran along Columbus Ave.
3. The Applicant presents a misleading characterization of the current setting and streetscape by omitting any mention of multiple historically accurate reproduction streetlights and lamp posts in the APE.

Each of these points are discussed in detail below.



**Image 1** – Looking south on Columbus Avenue at 97<sup>th</sup> Street. Note the two historically accurate Type-M reproduction streetlight poles with extension arms for traffic lights positioned on both sides of the street along with eight relatively mature street trees (just in this block) ~29’ tall in pictured in full leaf. The proposed tower shaft will be taller than and have greater diameter of both the tree trunks and the existing light Type-M poles that are 27’7” tall. (Source: Google Maps July, 2022.)

### 1. The Applicant Inaccurately Asserts that Installation Must be Visible from Nearest Resource as Sole Criteria for determination of “No Adverse Effect.”

On page 50 of Form 620, the applicant obliquely identifies “nearest resource” eligible for designation on the Federal Historic Register as the Upper West Side/Central Park West Historic District (UWS/CPWHD) and refers to Photos 10 and 11 on page 39. However, Photo 10 shows a non-contributing property at 44 West 96<sup>th</sup> on the right side of frame. In fact, the nearest boundary and contributing building in the historic district to the project site is “The Baldwin” at 46 West 96<sup>th</sup> Street as shown below. These within the .5-mile area of potential effects (APE).

Applicant offers as conclusory “Explanation for Effect Determination” (citing photos 10 and 11):

“The installation will not be visible from the resource due to intervening buildings. Therefore, the installation will have no effect on the resource.” (Italics and underlining added.)

But this simplistic – and erroneous – declaration by the applicant completely ignores the language of both the NPA and 36 CFR §805.5 that clearly anticipate “indirect” adverse visual effects.

Specifically, II. Definitions A.3 of the National Programmatic Agreement (NPA) states:

“Area of Potential Effects (“APE”). The geographic area or areas within which an Undertaking may directly or indirectly cause alterations in the character or use of Historic Properties, if any such properties exist.”

There is nothing in the expansive language of VI.C. Area of Potential Effects that limits adverse effects to “line of sight” visibility from the project and the historic resource. In fact, VI. C.3 states:

“3. The APE for visual effects is the geographic area in which the Undertaking has the potential to introduce visual elements that diminish or alter the setting, including the landscape, where the setting is a character-defining feature of a Historic Property that makes it eligible for listing on the National Register.”



**Image 2** - The Baldwin at 46 West 96th Street (awning at right) is the closest contributing property in the Upper West Side - Central Park West Historic District to the proposed project site. (Source: Google Maps, Dec 2017 – to show buildings when leaves off trees.)

### In high-density urban environments the Streetscape is the Landscape.

In dense urban areas like central Manhattan the “setting, including the landscape” is the streets, roadways, and sidewalks – and the buildings that line those spaces - within and between eligible resources including individual properties and entire districts.<sup>1 2</sup> Thus, the setting, including the landscape on the Upper West Side of Manhattan *is* the streetscape.<sup>3</sup>

Furthermore, §800.5 (a)(1) specifically requires that the applicant research and apply the “Criteria of Adverse Effect” including consideration of **any** diminished integrity of qualifying characteristics ground an eligible resource within the radius of potential effects that may be altered directly or indirectly. Those characteristics include location, design, setting, materials, workmanship, feeling, or association. **All** qualifying characteristics **must** be considered. And, reasonably foreseeable future effects, effects farther removed in distance or **cumulative** effects must also be considered.<sup>4</sup>

<sup>1</sup> Cambridge Dictionary defines setting as “the position of a house or other building” and offers as illustrative example “*their house is in an idyllic country setting.*” Synonyms would include place and surroundings.

<sup>2</sup> Cambridge Dictionary defines the noun landscape as “a large area of land, especially in relation to its appearance”.

<sup>3</sup> Cambridge Dictionary defines the noun streetscape as “the appearance or the design of the streets in a town or city.”

<sup>4</sup> 36 CFR § 800.5 “Assessment of adverse effects. (a) (1) **Criteria of adverse effect.** An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been



Unfortunately, the applicant has not presented an analysis that adequately investigates these criteria. Most particularly the applicant omits any consideration of the cumulative effects of multiple Link5G towers including the tower proposed just 2 blocks (approximately 600') south at 715 Columbus Avenue. (Site ID: MN-07-134709\_A)

The applicant's determination of "no adverse effect" completely misinterprets the linkages and interrelationships between the Columbus Avenue and the overall setting of the UWS/CPWHD – as an essential component of the original historic designation.

**2. The applicant disregards the "setting" along Columbus Avenue as a character-defining element of the adjacent Historic District:**

Columbus Avenue, particularly the block between West 96<sup>th</sup> and West 97<sup>th</sup> Streets adjacent to the project site is easily within the APE of .5 miles for the Upper West Side/Central Park West Historic District. The Landmarks Preservation Commission (LPC) identified the vital and mutually beneficial interconnections between the side streets and the avenues (most specifically Broadway, **Columbus**, and Amsterdam) as character defining elements of the setting ("complex urban area") of the Upper West Side/Central Park West Historic District.

Page 22 of LPC's Historic District Designation Report says it best: (italics and underlining added)

"Thus Central Park West, Broadway, and Columbus and Amsterdam Avenues are linked by side street blocks and several cross streets. All have a rich variety of interrelated buildings which produce a complex urban area constituting a distinct section of the city."<sup>5</sup>

Page 19 of the LPC Designation Report identifies the essential role of Columbus Avenue to the characteristics of the Historic District, first as a transportation route (the former Elevated Rail Line ran up and down Columbus Avenue - formerly known as Ninth Avenue) and subsequently as a commercial hub: (italics and underlining added)

"The district evokes the distinctive qualities of the Upper West Side, from its powerful iconography of twin towers along Central Park West to its active commerce along Columbus Avenue to its residential side streets. The initial development of the neighborhood reflects a concentrated boom in the city's expansion, supported by transportation improvements on the avenues. Although later construction, particularly in the 1920s and 1930s, replaced some of the original buildings, it has enhanced the vibrant quality of the Upper West Side both socially and architecturally."<sup>6</sup>

And page 21 of the Designation Report continues with this specific context relating to Columbus Avenue as the distinctive "spine of the district": (italics and underlining added)

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identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative."

<sup>5</sup>New York City Landmarks Preservation Commission, Upper West Side/Central Park West Designation Report, Vol. 1 Essays and Architects' Appendix, April 24, 1990 p.22

<sup>6</sup> Vol. 1 Essays and Appendix, April 2, 1990. p.19

“Columbus Avenue retains a character which reflects its historic nature as a transportation route. It was largely built up with flats and tenements which incorporated commercial storefronts at street level during the same years that rowhouses were being constructed on the side streets. This commercial role has survived to the present, making the avenue a strong spine in the district. Little original storefront fabric survives but stretches of facades of relatively uniform height and scale give the avenue its distinctive character. In some cases, the flats and tenements have been interrupted by twentieth-century apartment buildings, but these buildings also have storefronts at street level which reinforce the avenue’s commercial character.”

Thus, insertion of a 32’3” Link5G wireless tower on Columbus Avenue will dramatically diminish the setting as a character defining feature of the area adjacent to the nearby (and interconnected) Historic District and individual historic resources. It is essential to take a brief look at the evolution of the setting around the project site.

### **The Legacy of the 9<sup>th</sup> Avenue Elevated Railway Line:**



**Image 3** - Looking east towards 9<sup>th</sup> Avenue Elevated Station at 93<sup>rd</sup> Street circa 1939. The EI covered the entire width of the roadway along Columbus Avenue. The photo was taken shortly before EI was demolished. Trees of Central Park are somewhat visible (under tracks) in distance. (Source: NYPL Collections)

Christopher Gray in the Spring 1996 issue of LandmarkWest! Newsletter, explained that without Columbus Avenue, there would have been no Upper West Side:<sup>7</sup> (*italics and underlining added*)

“...historically, Columbus is the West Side’s most important street. The completion of Central Park in 1871 sparked very little construction on the west side – it was the completion of the clanking Elevated line up Columbus in the late 1870s that sparked the first serious development, from the Dakota on up. Today the towers on Central Park West have all but obscured Columbus’ position as the essential spine of the west side – how much more fitting if the great landmark area which encompasses it could have been titled the Columbus Avenue Historic District.”<sup>8</sup>

The Ninth Avenue Elevated (or simply El) was a dual track line built along overhead steel cross girders that ran directly above what is now known as Columbus Avenue from 59<sup>th</sup> Street to 110<sup>th</sup> Street from 1879 until 1940, The line was electrified in 1903 replacing steam powered engines.<sup>9</sup> The nearest stations in this neighborhood were at West 93<sup>rd</sup> Street and West 99<sup>th</sup> Street.

While the El was dismantled in 1940, one very important structural element of the historic streetscape continued in operation for another 20+ years until the 1960s...

#### **Ornamental Streetlight Poles were Installed along 9th Avenue (now Columbus Avenue) Elevated Railroad (“The El”):**

In the early 1900s, Bishops Crook streetlights (Design Type 6-BC) were installed on Columbus between 59th and West 100th Streets because the entire center of the roadway was filled with elevated railway structure. The narrower Bishops Crook streetlights were principally installed at intersections along Columbus to illuminate sidewalks and store fronts. For the most part those Bishop Crook poles remained standing until about the early 1960s when they were replaced by “modern” standard street lighting.

The narrow Bishop Crook design was installed throughout Manhattan beginning in the early 1900’s and typically mounted on a tubular steel shaft with ornamental base. (See Image 4 below) The Type 6-BC streetlights were particularly well suited to situations where width of sidewalks is restricted and with a special bracket under Elevated Structures.<sup>10</sup>

Those unimpressive “modern design” streetlights were fortunately only temporary and stood on Upper West Side sections of Columbus Avenue for a span of 30+ years until the mid to late 1990s...

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<sup>7</sup> Included in entirety as Attachment 1

<sup>8</sup> Christopher Gray, LandmarkWest! Newsletter, Committee to Preserve the Upper West Side, Spring 1996, p.9

<sup>9</sup> The elevated line was dismantled and much of the steel was sold to Japan. Bloomingdale Neighborhood History Group: <https://www.upperwestsidehistory.org/blogs/the-ninth-avenue-el>

<sup>10</sup> HISTORIC STREET LAMPPOSTS, Boroughs of the Bronx, Brooklyn, Manhattan, and Queens. Designation List 282, LP-1961, Landmarks Preservation Commission, June 17, 1997; page 31

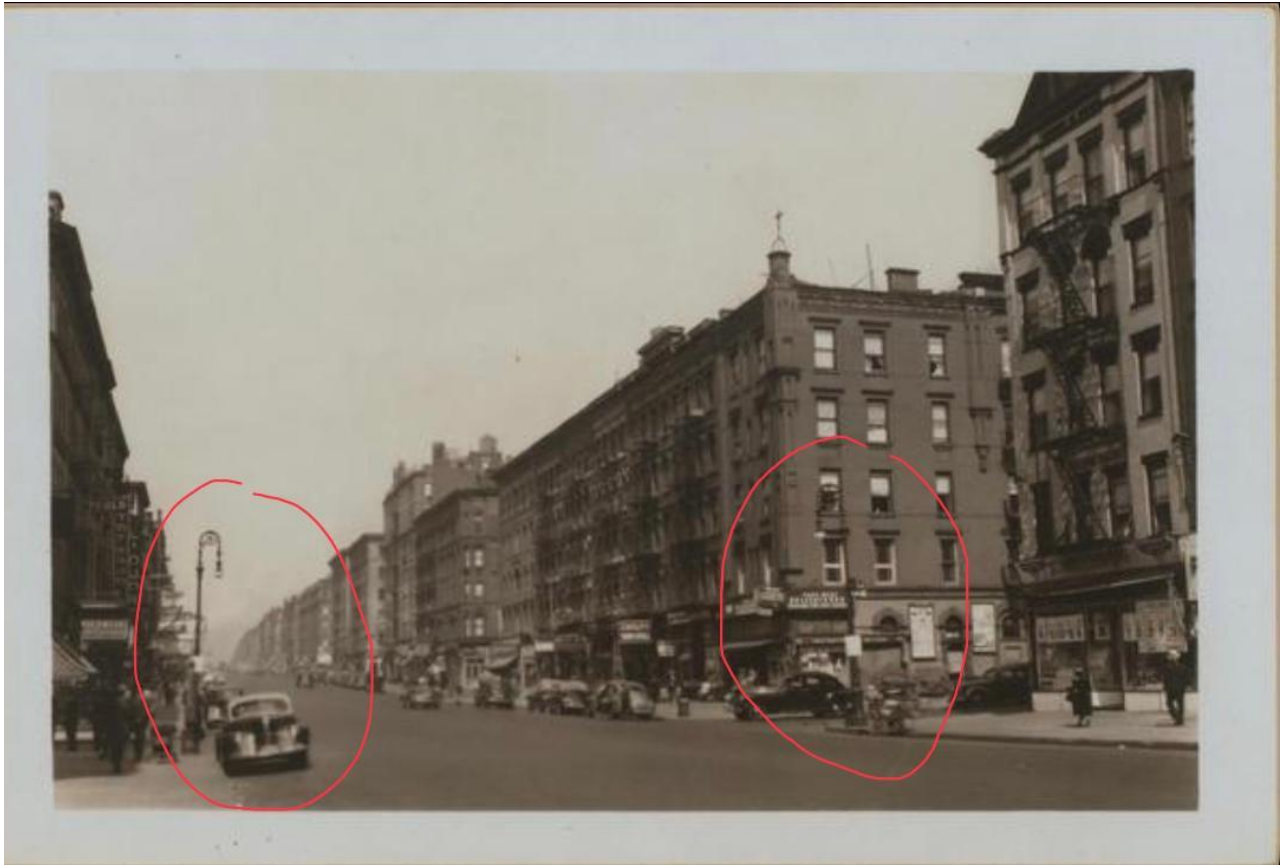


Image 4 – Looking north up Columbus Avenue at W. 83rd Street circa mid-1940s. Two Bishop Crook poles on opposite sides of intersection are highlighted with red circles. (Source: NYPL Archives)

### **The Reconstruction of Columbus Avenue:**

Then, beginning in 1994, the City undertook a massive reconstruction of Columbus Avenue between West 59th to West 110<sup>th</sup> Streets including both infrastructure and vegetation that *continues to have* a huge positive impact upon the setting, association and feeling of the adjacent Historic Districts.

The \$75 million project involved the total reconstruction of 2.4 miles of roadway and adjoining sidewalks including much needed repairs to underground sewers, some sections of which dated to 1830. Most significantly, in regard to the comments presented herein – were the planting of 375 new trees and “*reintroduction* of historic, early twentieth century cast iron lampposts.”<sup>11</sup> (See the entire 1996 LandmarkWest! Article regarding the restoration project included as Attachment 1.)

### **The Historical Significance of Reproduction Type-M Poles:**

In 1997, the Landmarks Preservation Commission published a detailed study as part of the designation of multiple original and surviving historic lamp posts throughout the five boroughs.

The Type 24M (now known simply as the Type M) was described as follows:

<sup>11</sup> John C.H. Lee, “**Columbus Avenue: Spine of the West Side,**” LandmarkWest! Newsletter, Committee to Preserve the Upper West Side, Spring 1996, p.8

“Mast Arm 24M (Type M)

12 remaining -- Post nos. 7-15, 45, 78, 95.

A simplified descendant of the mast arm post first used as part of the "Boulevard" lighting system (fig. 21). The base and shaft match the 24A bishop's crook. Two designs of scrollwork between the arm and shaft were used. This is the closest old model of mast arm post to those now being reproduced. The reproductions incorporate the garland on the shaft and the newer style of scrollwork.”<sup>12</sup>

According to the New York City Street Design Manual these poles were specifically designed for installation on the Upper West Side more than 100 years ago:



“The Type M pole, originally known as the Mast-Arm post, was introduced in 1908 for wide streets at corners on Broadway north of Columbus Circle and on Seventh Avenue north of Central Park. Bracket versions of the Mast-Arm were also attached to the facades of buildings. The reproduction of the Mast-Arm was introduced in the late twentieth century as the Type M pole.”<sup>13</sup>

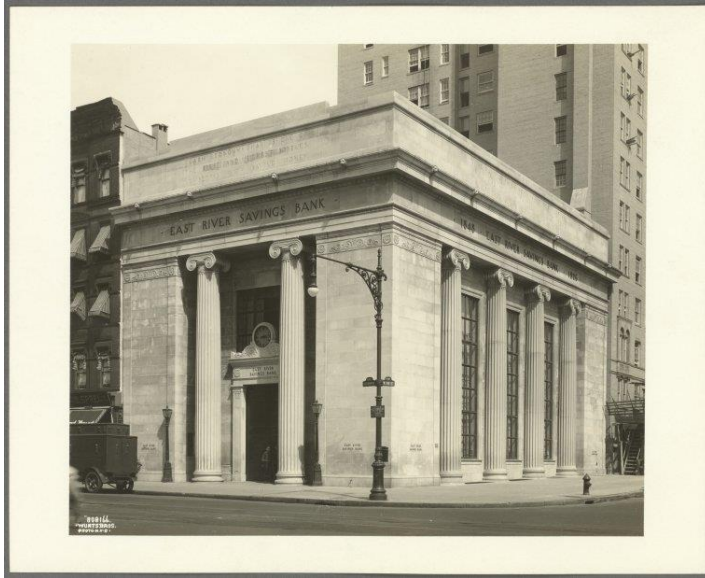
Also, according to the NYCDOT, Type M poles were placed on streets or cross streets with roadway width of 36 feet or more (such as the example circa 1920 shown in Image 5 below at Amsterdam and West 96<sup>th</sup> Street), but Type M would **not** have been placed on Columbus Avenue in the **early 1900s** because of the Elevated railway!

So, the fact is that both DOT and the Planning Design Commission have previously taken special measures to create a unique *setting and feeling* by “reintroduction” of Type M ornamental streetlighting along this entire section of Columbus Avenue. (While the standard paint color for the Type M iron pole is black, the poles along Columbus are painted deep green.)

<sup>12</sup> HISTORIC STREET LAMPPOSTS, Boroughs of the Bronx, Brooklyn, Manhattan, and Queens. Designation List 282, LP-1961, Landmarks Preservation Commission, June 17, 1997; page 7 (The designation report also specifically mentions on page 6 “Type 24-M posts are also being reproduced and have been installed...on Columbus Avenue...”)

<sup>13</sup>Street Design Manual, New City Department of Transportation 2020 Third Edition, page 165





**Image 5-** Intersection of 96th St and Amsterdam Ave. circa 1920, looking east toward East River Savings Bank. (Approx 1000' from project site.) Note the Type – M pole which, regrettably, was subsequently removed and replaced with so called “modern standard streetlight”. (Source: Wurts Bros. Negative #808166. NYPL.)

**3. The Applicant Presents a Misleading Characterization of the Setting and the Streetscape by omitting mention of historically accurate reproduction streetlights and lampposts in APE:**

The narrative description in “Site Information” as submitted by the applicant (on page 48) states:

“The terrain has no significant elevation changes and includes paved roads and parking lots, concrete sidewalks and curbs, traffic and utility infrastructure, street signage, recreational parks, and modest landscaping with mature trees throughout the area.” (italics and underlining added)

Clearly, the applicant seeks to suggest that the area around the site – aside from “*modest landscaping*” and visually unremarkable “*traffic and utility infrastructure*” – is merely a utilitarian commercial corridor in a highly urbanized environment.

But this bland characterization fails to paint a complete and realistic picture of the actual setting.

The applicant conveniently ignores the presence of **all** historically accurate reproduction streetlight infrastructure on roadways and sidewalks adjacent to the proposed installation (on Columbus Ave., between West 96<sup>th</sup> and West 97<sup>th</sup> - as well as additional blocks north and south - and also minimizes the presence of meaningful and significant vegetation, particularly plentiful mature trees inside APE.

Photo 1 on page 34 of the Form 620 is the **only** photo of Type M poles present on Columbus Avenue between West 96<sup>th</sup> and West 97<sup>th</sup>, which is a remarkable feat of selective photo curation. There is a total of four Type M poles just on the immediate four corners of Columbus Avenue at both the intersections of West 96<sup>th</sup> and West 97<sup>th</sup> north and south of the project site. There is also a mid-block pole on the west side of the street. (The applicant’s Photo 1 is taken from across the street with red arrow marking Project Site, but no explanation regarding the ornamental streetlight.)

And the applicant shows just a single photo of the historically accurate reproduction of a Type B (Pedestrian) luminaire on a standard base and pole in Photo 6. That photo on page 37 of Form 620 is

misidentified as “looking North”, when, in fact, the camera direction is looking south, but inexplicably the applicant offers no narrative to identify this Type B luminaire. (There are two Type B lampposts on the east side of the block, just to the south of the project site.)

The applicant’s apparent lack of intellectual curiosity regarding the presence of these unique and distinctive lampposts (and how they came to be on Columbus Avenue) is perplexing, to say the least. Evidence of this is the complete omission of any narrative mentions of historically accurate utility architecture contained in the Form 620 submission to the NYSHPO.

Since the late 1990’s the City has made significant investments in designing an integrated and attractive streetscape with high quality, historically accurate “boulevard” lighting infrastructure and lush vegetation that associates Columbus Avenue as the principal commercial gateway for pedestrian and vehicle access to the nearby historic districts. This reconstruction resulted in multiple Type M poles (and the Type B luminaires) along with significant quantity of trees (there are eleven in total, roughly 40’ apart on both sides of Columbus Avenue just in the block between West 96<sup>th</sup> and West 97<sup>th</sup>.)

A walking survey of the area of Columbus Avenue between West 88th and West 110th Streets identified no fewer than 69 Type M poles as indicated on the map (Image 6) below. Clearly, both the DOT and PDC have sought to create a parklike streetscape/setting in this area with historically accurate lighting elements and ample vegetation to better connect with designated and eligible historic district and resources within the APE.<sup>14</sup>

The proposed Link5G tower will insert an intrusive, over-scaled infrastructural element that is completely out of context with the Type M poles along Columbus Avenue and will alter and diminish the setting, feeling and association that these ornamental streetlights create as the “essential *spine of the west side.*”

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<sup>14</sup> Additional archival information has been requested from the NYC Public Design Commission regarding the Columbus Avenue Reconstruction project and may be submitted to NYSHPO as an addendum, when available.

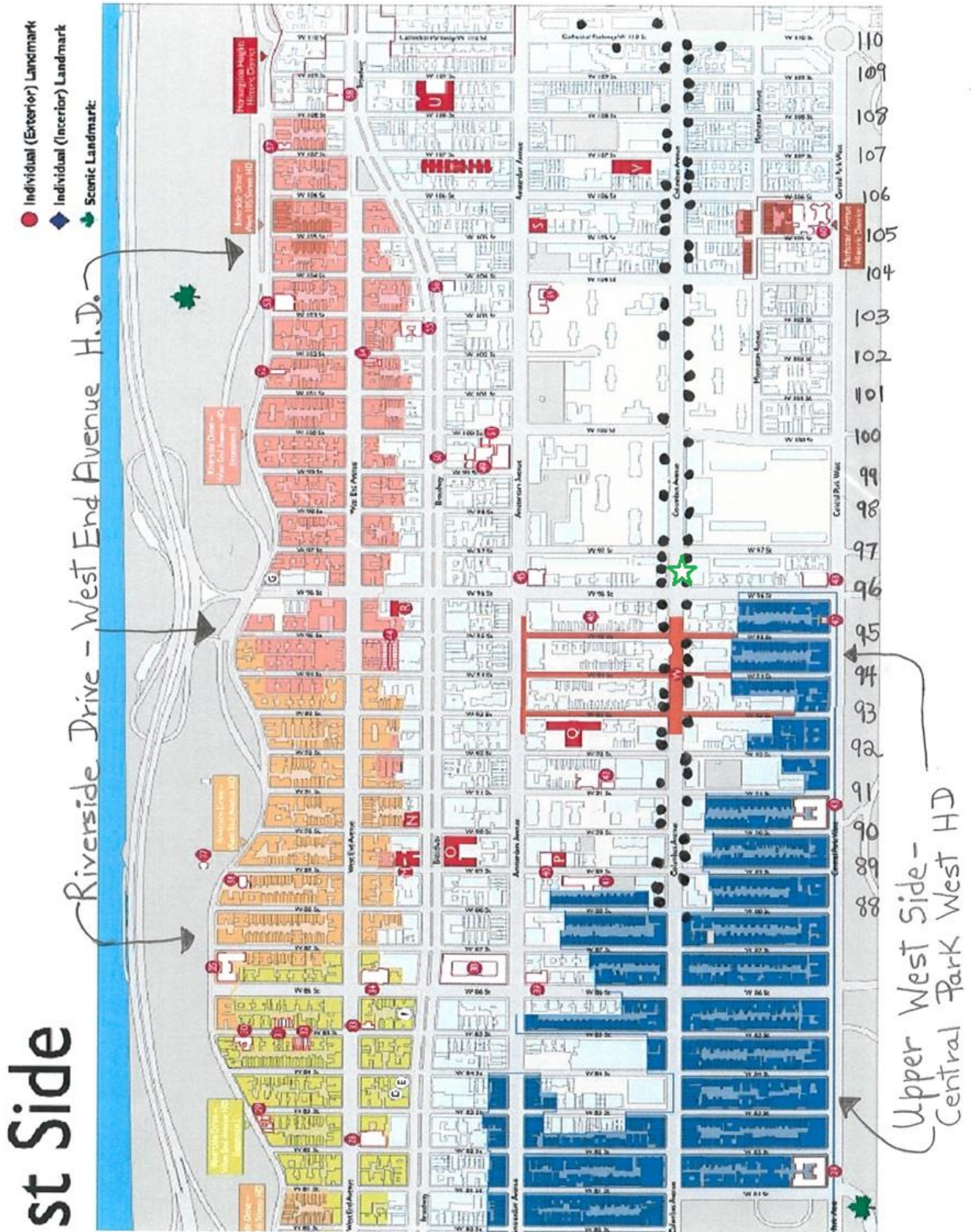


Image 6 – Map of Upper West Side showing 69 Type M streetlight poles along Columbus Avenue between West 88<sup>th</sup> and West 110<sup>th</sup>. The green star indicates approximate location of Project Site.



### Historical Significance of Type B Pedestrian Pole:

The DOT and LPC have apparently taken additional steps to facilitate historically accurate lighting mid-block on the east side of Columbus Avenue between 96<sup>th</sup> and 97<sup>th</sup> Streets – most likely also as part of the Columbus Avenue reconstruction project. As mentioned above, the two distinctive Type B Pedestrian luminaires are sited mid-block on east side sidewalks near the proposed installation site. A separate walking tour of Columbus Avenue between West 90<sup>th</sup> and West 97<sup>th</sup> Streets identified 15 such ornamental Type B pedestrian lampposts. (See map in Image 8 below.) These ornamental lampposts also represent major undertakings by NYC DOT to improve the setting, feeling and association of Columbus Avenue adjacent to historically significant properties within the APE.

According to the New York City Street Design Manual:

“The Type B pedestrian light was originally introduced in 1911 by designer Henry Bacon for the Central Park Mall and later installed in other city parks. The current version of the Type B pole was developed in the late twentieth century and offers a more traditional design for pedestrian areas such as parks and plazas.”<sup>15</sup>

Unfortunately, on the specific lampposts between West 96<sup>th</sup> and West 97<sup>th</sup> on Columbus the decorative poles and bases are missing, and the black painted luminaire is mounted on octagonal, unpainted steel standard streetlight (SSL) poles. But the placement of the Type B on an SSL pole may be a **factor of cost** as both the Type M and Type B are considerably more expensive than standard fixtures. Budgetary issues have limited deployments (and sometimes maintenance) of historically accurate reproduction lampposts. Historic preservation organizations continue to aggressively push the City for more such infrastructure. These ongoing advocacy efforts may succeed in getting the remaining components in the future.



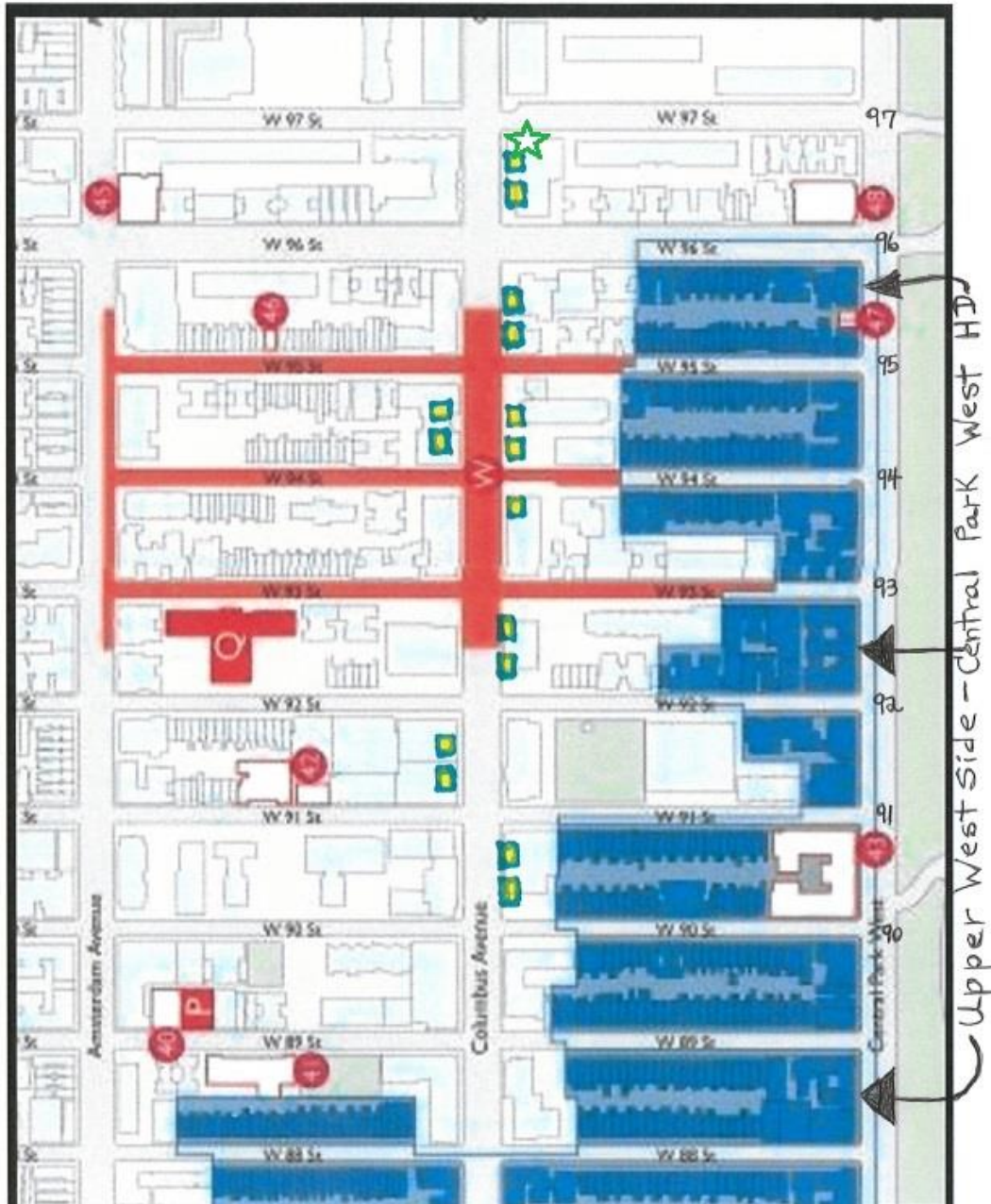
**Image 7** – The Type B luminaire on standard octagonal pole shown in the center of this photo is one of two located mid-block on eastside of Columbus Avenue between West 96<sup>th</sup> and West 97<sup>th</sup> Streets.

<sup>15</sup> <https://www.nycstreetdesign.info/lighting/type-b-pedestrian-pole>



(The nearest Type B luminaires in the APE, attached to the **correct** poles and bases, are located two blocks south on Columbus between West 94<sup>th</sup> and West 95<sup>th</sup> Streets. Other examples exist on additional blocks along Columbus as indicated on map below in Image 8.)

As with Type M streetlights, placement of Type B pedestrian poles outside of historic districts (in this case a wide section of sidewalk that is much like a pedestrian plaza) requires PDC approval.



**Image 8** – Map of Type B Pedestrian poles (marked as blue and yellow squares) on sidewalks of Columbus Avenue between West 90<sup>th</sup> and West 97<sup>th</sup> Street. The approximate location of Project Site is marked with green star.

### The Applicant may NOT unilaterally reduce the area of potential effects (APE):

The applicant refers to supposed “consultations” with the FCC that have determined “a 500-foot radius around the project site is an appropriate APE-VE for the vast majority of the CityBridge Link5G sites.”

However, the applicant conveniently omits any supporting documentation to explain when and with whom at the FCC those “consultations” might have occurred. Nor does the applicant provide verification as to whether the individuals consulted at the FCC have any authorization or credentials to offer guidance regarding APE boundaries in an urban setting.

In language that appears to be standard boilerplate and has been submitted on multiple Form 620s for various CityBridge/Boldin Networks undertakings, the applicant (see commentary “b.” on page 49) paraphrases Section VI.C.1-5 from Appendix C to Part 1 — *Nationwide Programmatic Agreement Regarding the Section 106 National Historic Preservation Act Review Process* as published in September 2004.<sup>16</sup>

Specifically, the applicant also references this actual excerpt from VI.C.5:

...“in the event that the Applicant determines, or the SHPO/THPO recommends, that an alternative APE for visual effects is necessary, the Applicant **and** the SHPO/THPO ***may mutually agree*** to an alternative APE.” (bold and italics added)

We believe it’s appropriate to remind the New York State Historic Preservation Office that VI.C.4. grants exclusive authority to NYSHPO (not the FCC) for consultations about any changes to the APE, and VI.C.5 obligates NYSHPO to mutually agree to any changes in the dimensions of the APE prior to such reduction in the APE taking effect. Neither determinations by the FCC nor unilateral or arbitrary APE boundary adjustments by the applicant are allowed by the NPA as amended.

To our knowledge no such reductions of the APE for this or any other CityBridge/Boldin Networks undertakings in NYC have been announced by NYSHPO. So, the .5-mile APE radius stands.

### Conclusions

Accordingly, as a consulting party, I strongly disagree with and object to the mostly unsupported assertions and findings of the applicant, which have failed to consider **all** the direct and indirect effects that the proposed tower will have upon the setting **within entirety of the APE**, but most particularly including Columbus Avenue.

This proposed Link5Gtower will introduce dominant, out of context and ultra-modernistic streetscape architecture that creates “visual adverse effects” by **altering and diminishing** the feeling and association of a carefully reconstructed setting in the APE where historically accurate

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<sup>16</sup> <https://www.ecfr.gov/current/title-47/part-1/appendix-Appendix%20C%20to%20Part%201>

streetlamps, lampposts, and extra vegetation, contribute to the significance of the adjacent historic districts.

I urge NYSHPO to conclude that this proposed undertaking will result in an “**adverse visual effect**”.

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

Consulting Party for: New Yorkers For Wired Tech

<https://newyorkers4wiredtech.com/>

**Commenting on Sites within Manhattan Community Board 7 (mCB7)**

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## Attachment 1



## Columbus Avenue: Spine of the West Side

by John C. H. Lee

Colorful Columbus Avenue, once the site of the noisy Ninth Avenue El (1879-1940), is preparing for the largest reconstruction project to be undertaken to date by New York City's Department of Transportation (DOT). Beginning late this summer, the \$75 million project will consist of the total reconstruction of the roadway and sidewalks of Columbus between 59th and 110th Streets (2.4 miles). It is anticipated that the project will take approximately two years to complete. When the reconstruction begins in earnest (either September or October), traffic flow will be diverted to Broadway.

The project will also include work on the sewers and most of the three water mains located beneath the avenue. No major work has been done on Columbus Avenue since the 1950s, though the avenue has one of the oldest water lines in New York (some sections dating back to 1830).

The question on the minds of most Upper West Side residents already bracing themselves for the worst is: How long is it really going to take? Will Columbus Avenue experience the delays of the DOT's Avenue of the Americas job which lagged more than two years behind schedule?

Fortunately, one of the most positive, enduring results of the project will be the replacement of the street lights and street signs lining Columbus Avenue. Where appropriate, the street signs will indicate the Upper West Side/Central Park West Historic District, and will be colored a distinctive terra cotta, black, and white. 375 new trees will also be planted along

Columbus. When the project nears completion, the avenue will see the arrival of granite curbing, tinted concrete sidewalks in a "cool gray" color in landmarked areas, and the reintroduction of historic, early twentieth-century cast iron lampposts (see illustration).

*John C. H. Lee is attending Columbia University's Historic Preservation program and is a member of the LANDMARK WEST! Certificate of Appropriateness Committee.*

### Christopher on Columbus:

"Despite the burp of flashy stores that swept over Columbus Avenue in the 1980s, it is still an afterthought avenue, without the weight of Central Park West, West End, Riverside or even funky Broadway. This is all backwards because, historically, Columbus is the West Side's most important street. The completion of Central Park in 1871 sparked very little construction on the west side – it was the completion of the clanking Elevated line up Columbus in the late 1870s that sparked the first serious development, from the Dakota on up. Today the towers on Central Park West have all but obscured Columbus' position as the essential spine of the west side – how much more fitting if the great landmark area which encompasses it could have been titled the Columbus Avenue Historic District."

*Christopher Gray was once a West Sider.*

<https://www.landmarkwest.org/newsletter-spring-1994/> (Page 8)