

Alexis Green

From: Herter, Nancy (PARKS) <Nancy.Herter@parks.ny.gov>
Sent: Monday, March 18, 2024 5:00 PM
To: Alexis Green; Bullough, Sloane (PARKS); Brazee, Olivia (PARKS)
Cc: Chris Robinson
Subject: RE: EBI# 6123006709, 741 Columbus Ave, New York, E106# 0010740923, NOT BUILT

Follow Up Flag: Follow up
Flag Status: Completed

Good Afternoon Alexis,

We have reviewed the additional raw image files showing visibility of the mock-up from Central Park, and we hereby rescind our previous finding of Adverse Effect. Upon closer analysis of the images, it appears that only the top portion of the proposed tower will be visible over the existing one-story building, and that the overall level of visibility will be minimal. Therefore, it is SHPO's opinion that the proposed tower will have No Adverse Effect on historic resources. (NH, 3/18/24)

We will also update the shared spreadsheet with this comment.

Nancy

Nancy Herter, Ph.D.
Director, Technical Preservation Services Bureau
Division for Historic Preservation

New York State Parks, Recreation & Historic Preservation
PO Box 189, Peebles Island, Waterford, New York 12188-0189
(518) 268-2179 | nancy.herter@parks.ny.gov
<https://parks.ny.gov/shpo>



We'll see you out there

From: Herter, Nancy (PARKS)
Sent: Friday, March 15, 2024 11:32 AM
To: Alexis Green <agreen@ebiconsulting.com>; Bullough, Sloane (PARKS) <Sloane.Bullough@parks.ny.gov>; Brazee, Olivia (PARKS) <Olivia.Brazee@parks.ny.gov>
Cc: Chris Robinson <crobinson@ebiconsulting.com>
Subject: RE: EBI# 6123006709, 741 Columbus Ave, New York, E106# 0010740923, NOT BUILT

Thank you. I was able to access the zip file.

From: Alexis Green <agreen@ebiconsulting.com>
Sent: Thursday, March 14, 2024 3:43 PM
To: Herter, Nancy (PARKS) <Nancy.Herter@parks.ny.gov>; Bullough, Sloane (PARKS) <Sloane.Bullough@parks.ny.gov>; Brazee, Olivia (PARKS) <Olivia.Brazee@parks.ny.gov>
Cc: Chris Robinson <crobinson@ebiconsulting.com>
Subject: RE: EBI# 6123006709, 741 Columbus Ave, New York, E106# 0010740923, NOT BUILT

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I had to PDF the images for e106 and I am still waiting for it to upload. But here is a link to the jpegs.

 [Line of Sight Test Raw images.zip](#)

Please let me know if you can't access the zip file.

Alexis Green

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21 B Street | Burlington, MA | 01803
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From: Bullough, Sloane (PARKS) <Sloane.Bullough@parks.ny.gov>
Sent: Friday, March 8, 2024 9:42 AM
To: Alexis Green <agreen@ebiconsulting.com>; Brazee, Olivia (PARKS) <Olivia.Brazee@parks.ny.gov>
Cc: Herter, Nancy (PARKS) <Nancy.Herter@parks.ny.gov>; Chris Robinson <crobinson@ebiconsulting.com>
Subject: RE: EBI# 6123006709, 741 Columbus Ave, New York, E106# 0010740923, NOT BUILT

Alexis,

We would be happy to meet with you. We are available on Thursday, March 14 at 2:30 pm. Does that work for you?

Sloane Bullough

Historic Sites Restoration Coordinator/Technical Preservation Services Unit

New York State Parks, Recreation & Historic Preservation
Peebles Island State Park, P.O. Box 189, Waterford, NY 12188
518-268-2158 | sloane.bullough@parks.ny.gov
www.parks.ny.gov/shpo

From: Alexis Green <agreen@ebiconsulting.com>

Sent: Thursday, March 7, 2024 7:30 PM

To: Bullough, Sloane (PARKS) <Sloane.Bullough@parks.ny.gov>; Brazee, Olivia (PARKS) <Olivia.Brazee@parks.ny.gov>

Cc: Herter, Nancy (PARKS) <Nancy.Herter@parks.ny.gov>; Chris Robinson <crobinson@ebiconsulting.com>

Subject: RE: EBI# 6123006709, 741 Columbus Ave, New York, E106# 0010740923, NOT BUILT

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Dear Sloane and Olivia,

Based on the existing review history and previous communications with Olivia about this site, I would appreciate the opportunity to discuss this most recent finding with you. Would it be possible to set up a call at your earliest convenience?

Given the original concurrence and the results of the balloon test, I am unclear how the finding has now been elevated to an Adverse Effect and would greatly appreciate the opportunity to discuss it further, with specific consideration given to the following facts:

- The proposed pole will be located a significant distance, over 900 feet, from the boundary of Central Park
- Modern architecture is located in the immediate area of the proposed pole. Due to the ages and designs of these buildings it is unlikely that this area would be added to any existing historic district and would be considered incompatible or incongruent with the area immediately surrounding the park. Due to this incompatibility, this area should not be considered as part of the setting of the park and, as such, the addition of this pole would not further compromise the surrounding area.
- The visibility of the pole from within the Park is significantly limited by mature trees and the large buildings immediately adjacent to the Park. During leaf off seasons the pole will be only slightly visible through numerous trees and during leaf on seasons there will be next to no visibility.
- Central Park is 840 acres in size. Given the large number of mature trees, intervening buildings, and distance the line of sight to the proposed pole is limited to a small area measuring approximately 1.43 acres, which is 0.17% of the entire park. EBI does not believe this extremely low percentage of visibility would result in an adverse effect to the Park.
- Lastly, the balloons used in the balloon test were white, which is more highly visible than the glossy and matte grey of the proposed pole (matching the existing traffic lights and poles supporting street signs in the immediate vicinity of the Park).

Thank you in advance for your time and the opportunity to work continue this conversation. Please let me know what date and times might work for you and I'll do my best to accommodate them.

Alexis Green

Assistant Technical Director, Cultural Resources

Office: (585) 815-3290

agreen@ebiconsulting.com



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From: Bullough, Sloane (PARKS) <Sloane.Bullough@parks.ny.gov>
Sent: Thursday, March 7, 2024 2:17 PM
To: Alexis Green <agreen@ebiconsulting.com>; Brazee, Olivia (PARKS) <Olivia.Brazee@parks.ny.gov>
Cc: Herter, Nancy (PARKS) <Nancy.Herter@parks.ny.gov>; Chris Robinson <crobinson@ebiconsulting.com>
Subject: RE: EBI# 6123006709, 741 Columbus Ave, New York, E106# 0010740923, NOT BUILT

Alexis,

We have reviewed the "Visual Resource Analysis" report that was submitted to our office on February 29th, including photos of the physical mock-up that was conducted per our e-mail request of February 12th, 2024. The physical mock-up demonstrated that the top portion of the proposed 5G tower will be visible from points within Central Park, which is a National Historic Landmark (the highest level of historic designation) and significant for its picturesque landscape design and setting. We have considered the viewshed impacts of the proposed tower on the setting and design qualities of Central Park, and it is SHPO's opinion that the tower will have an Adverse Effect on the NHL Central Park because of its large scale and massing, contemporary design, and light-colored and reflective materials, which are incompatible with the historic setting of the Park and will detract from its special sense of place.

Sloane Bullough

Historic Sites Restoration Coordinator/Technical Preservation Services Unit

New York State Parks, Recreation & Historic Preservation
Peebles Island State Park, P.O. Box 189, Waterford, NY 12188
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www.parks.ny.gov/shpo



We'll see you out there

From: Alexis Green <agreen@ebiconsulting.com>
Sent: Friday, March 1, 2024 9:39 AM
To: Brazee, Olivia (PARKS) <Olivia.Brazee@parks.ny.gov>
Cc: Herter, Nancy (PARKS) <Nancy.Herter@parks.ny.gov>; Chris Robinson <crobinson@ebiconsulting.com>; Bullough, Sloane (PARKS) <Sloane.Bullough@parks.ny.gov>
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Olivia

As this was a request for further information and that information was received rather quickly, 17 days, is there any way to expedite this with your office and the consulting parties?

Thank you

Lexi

Alexis Green

Assistant Technical Director, Cultural Resources

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From: Alexis Green

Sent: Thursday, February 29, 2024 5:05 PM

To: 'Brazee, Olivia (PARKS)' <Olivia.Brazee@parks.ny.gov>

Cc: 'Herter, Nancy (PARKS)' <Nancy.Herter@parks.ny.gov>; Chris Robinson <crobinson@ebiconsulting.com>; Sloane.Bullough@parks.ny.gov

Subject: EBI# 6123006709, 741 Columbus Ave, New York, E106# 0010740923, NOT BUILT

Dear Sloane and Olivia,

EBI received concurrence for this site from your office on December 28, 2023. EBI provided the Consulting Parties Comment Summary Form and all comments on December 29, 2023. Your office then retracted concurrence on December 30, 2023 and asked for relocation based on potential visibility from Central Park and other historic resources included in the FCC Submission Packet and Consulting Party comments. EBI provided additional visibility analysis on January 8, 2024. Your office responded with concurrence of No Effect to historic properties on January 10, 2024. The consulting party comment summary form and comments were provided to your office on February 9, 2024. Your office responded on February 12, 2024 requesting a mock up of the proposed pole with photographs to demonstrate the actual visibility/non-visibility of the tower from Central Park. EBI contacted your office to get clarification on what the requested mock up should entail. Your office indicated that a balloon or balloons with the same width as the proposed pole and raised to the height of the proposed tower would be sufficient.

Sigma Technologies conducted the balloon test on February 21, 2024. Please see the attached report which provides the details of the test, such as the height and width of the balloons, weather conditions and multiple photographs of the balloon. The test resulted in minimal visibility of the balloons from the boundary of Central Park and within its grounds. There will be no visibility of the pole through the trees during leaf on seasons from Central Park. It should be noted that the balloons used were white while the pole will be aluminum. The white balloons are more highly visible than the pole will be.

Given the results of the attached report, EBI continues to believe the proposed pole will have No Effect on historic resources within the Area of Potential Effects and request your concurrence.

This email and report have been shared with the consulting parties.

Sincerely,
Alexis

Alexis Green

Assistant Technical Director, Cultural Resources

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