



April 12, 2022

106 Comments on Verizon 5G Proposal -Adverse Effects  
FCC File Number 0009971111, Baltimore, MD

As a designated consulting party, the Roland Park Civic League's elected Board submits the following comment as part of the Section 106 review underway regarding the placement of Verizon 5G cell node antennas within our nationally-registered historic district. At the League's monthly meetings and by way of email and in-person conversations, a number of community members have urged the Civic League Board to advocate for the preservation of Roland Park's visual landscape, having recently learned about Verizon's plans. In conversation with Verizon and the SHPO, ten 5G cell nodes will be placed in Roland Park in the coming months. Three of these are outside the historic district of Roland Park, and two will be placed on existing cobra metal light posts. The remaining five (5) sites are to be located on City right of ways directly adjacent to multiple residences greater than 100 years old. It is our current understanding that the cell node antennas will be attached to the top of replaced wooden poles that are of greater height than nearby wooden poles. We are concerned about these 5 current locations and their direct and indirect adverse effects on the historic character of Roland Park.

The subject five (5) locations are:

- 1) Loyola 55 Club/Upland
- 2) Loyola NR29 Hawthorn/Park
- 3) Loyola 60 Woodlawn/Upland
- 4) Loyola 47 Ridgewood/Kenwood
- 5) Loyola 35 Elmhurst/Club

We ask SHPO to recommend that Verizon modify its plan to avoid or mitigate the cell nodes antennas' adverse visual effects by considering that the antennas will be located on residential side streets, not commercial corridors, and the antennas will vertically mar the neighborhood's topography. We also are concerned about the equipment's color, style and position.

First, we would ask that SHPO consider recommending the antennas elimination all together on side streets. It is the belief of some community members that eliminating the five (5) installations entirely will have a minimal effect on the network plan. Accordingly, we request all 5G cell node antenna installations in Roland Park be limited to existing cobra style metal poles on Cold Spring, Falls Road, Roland Avenue and University Parkway, thereby matching the agreement reached in nearby Guilford, another nationally registered historic district in Baltimore City.

Second, topography is a defining character of the Roland Park Historic District (B-136, NRHP 74002213). In applying for its national historic district designation, Roland Park [referenced its](#) "setting" as "natural terrain and vegetation, the parklike setting, the wooded paths and streets which wind uphill and down all contribute to the uniqueness of this splendid garden suburb" and "a controlled natural setting ...preserving the steep hillsides, valleys, streams and woodlands. Great caution was exercised to protect the trees and natural vegetation ...following the natural contours of the site." Additionally, Baltimore's Commission for Historic and Architectural Preservation (CHAP) also recognizes topography and the natural beauty as important in [Roland Park](#). By placing 5G cell node antennas on poles in excess of 40

feet places the 5G equipment in direct view of front windows, porches and front yards of our residential homes. This clearly has an adverse effect on the “borrowed views” critical to landscape planning when the Roland Park Company developed this area. The height of existing trees, sometimes referenced as “camouflaging” the antennas, will change as some die and others grow. Further, it appears that ongoing trimming of the tree canopy will be required to accommodate the 5G equipment and in turn damage the green space, another defining feature of this historic district.

Third, if these 5G cell node antennas are permitted to move forward, the color and style of the 5G small cell nodes a/k/a antennas selected by Verizon for Roland Park is not ideal. The light gray or silver color fits well with the metal cobra style street light poles on the corners of Roland Avenue and University Parkway. However, the five (5) locations listed above involve wood poles on side roads near residences in Roland Park. Placing antennas on the very top of these wood poles as shown in the concept design sketches will have a direct adverse visual effect for those residing in adjacent homes and all traveling by. A different style, an alternative color option (i.e., brown), and lower mounting position are reasonable modifications available to minimize such effects. Additionally, the possibility of relocating each of these five (5) proposed installations away from front yards to a more obscure spot in the right of way bordering a side or backyard exists and could be easily identified in a site visit with adjoining property owners.

Finally, several atypical factors have come to our attention that complicate the current 106 Review:

A. The project is not essential to the community, despite Trileaf’s statement to the contrary on behalf of Verizon. (See Attachment 5a. and Attachment 7c. of its’ submission packet.) Verizon’s proposed 5G network plan was not requested or approved by our community. Many residents are interested in the improved connectivity, while others are not.

B. Most residents are unaware of how to accurately describe adverse effects of a historic nature in their comments, instead simply stating they oppose the project or aren’t interested in the service.

C. Baltimore City’s [Design and Aesthetic Standards](#) effective March 28, 2019, have been ignored by Verizon with several specific violations at each of the five (5) sites under review, including but not limited to: VI. c, d, e, h, j, k, l, n, s and VIII. e and f.

D. Once the first few 5G equipment sites are installed on side roads, it is anticipated other carriers will follow and opens the door for future proliferation throughout the historic district. Over time more locations or colocations will cumulatively diminish the historic look of the neighborhood.

E. There was no 106 Review in 2020-21 when 5G installations occurred along Cold Spring, Roland Avenue and University Parkway on existing cobra metal street lamps; nor was notice provided to the Roland Park Civic League. This timeframe coincided with several Covid-19 lockdowns ordered by City and State authorities, which may have contributed to the lack of communication and local awareness. While the existing locations utilize metal cobra style street light poles, some in our community question the lack of any 106 review prior to those installations and believe these were allowed in error. At a minimum, our community expects the current review to acknowledge that error by providing increased attention and scrutiny now.

We look forward to collaboratively resolving these concerns to benefit our community and all stakeholders.

Sincerely,

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