



THE ADVOCATE FOR NEW YORK CITY'S HISTORIC NEIGHBORHOODS

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June 7, 2023

Jennifer Gutierrez, Chair  
New York City Council Committee on Technology  
City Hall  
New York, NY 10007

**Re: Oversight – LinkNYC: Deployment of 5G Infrastructure and Wi-Fi Connectivity across the City**

Dear Chair Gutierrez,

The Historic Districts Council is the citywide advocate for New York's architectural, historical and cultural neighborhoods. We work with over 500 neighborhood organizations in all 5 boroughs. We are concerned about New York City's installation and review process surrounding its Link5G tower infrastructure.

We are troubled by the towers' massive 32-foot height, utterly imposing scale, and complete lack of design, which seems to have no regard for New York's historic resources, the city's residential scale, or the urban experience. For an administration that has appointed the City's first Public Realm Officer, this program seems utterly discordant with that realm.

Speaking of serving the public, we are also chagrined that the first phase of the tower program, which the City claims will help bridge the digital divide, did not site towers in equity districts beyond Manhattan's core and in the other boroughs; instead the first towers appeared in areas like the Upper East Side and Soho, neighborhoods seemingly chosen to benefit CityBridge, a private carrier, and not New Yorkers most in need of digital access.

We wonder why the first phase of towers has already been installed, given that the program will have to go through the Federal Section 106 Historic Review process, as confirmed by the Federal Communications Commission. We believe it would have been more financially and environmentally appropriate for the City to have waited for that review process to take place, rather than installing structures it may have to take down over the course of the review. HDC is a consulting party in the Federal Section 106 process, and thus far the materials and communications we have received have been incomplete and disorganized.

On the municipal level, HDC is the citywide advocate for New York's architectural, historical and cultural neighborhoods. We wonder how and when these towers will come before the Landmarks Preservation Commission (LPC). According to the City's presentations to the Public Design Commission (PDC), Link5G installations in historic areas require review and approval of the LPC, and installations adjacent to public parks require review and approval of the Department of Parks & Recreation (DPR). As of yet, there

has been no such review of the 5G towers from either of these agencies. We urge the City Council to halt any further rollout of this program until at least three conditions are met:

- 1) The towers undergo Section 106 Review
- 2) There are clear dates and guidelines for a public hearing by the LPC
- 3) There is a clear equity map showing where and why 5G kiosks will be installed in specific locations.

Thank you,



Frampton Tolbert  
Executive Director