



January 12, 2023

First Deputy Mayor Sheena Wright  
Deputy Mayor Maria Torres-Springer  
City Hall  
New York, NY 10007

Dear Deputy Mayors Wright and Torres-Springer,

The undersigned groups request information regarding the installation of new 32-foot tall Link5G towers across the City. We have heard from many constituents raising numerous concerns about these installations and about the chaotic and opaque review process for their approval.

The City's Office of Technology & Innovation (OTI) should provide a public update on the project, including (1) clarification of the process for identifying and approving locations for Link5G towers, including reviews by City agencies and how the borough presidents are informing residents of the installations and the community feedback process; (2) a detailed list of the siting limitations and requirements, with representative illustrations; (3) A list of Link5G installations to date, with equity districts noted; and (4) maps showing all installations to date at the borough, neighborhood and street scale.

The LinkNYC structures are poorly designed, massive, and will clutter the city's streetscapes, detracting from historic districts and individual landmarks. The towers are inappropriate and out-of-scale for residential areas and for commercial areas in many historic districts, where narrow sidewalks and lower-scale buildings are prevalent.

The Public Design Commission (PDC) has binding jurisdiction on the design, but even they have open questions about it. The PDC approved the installations in limited districts (commercial, commercial overlay, and manufacturing) with strict siting requirements. While reviewing the expansion of the program to residential and historic districts in September, PDC Commissioners asked whether the visual impact could be reduced. They pressed OTI and vendor CityBridge to return to the PDC with a global design comparison, but that has not occurred.

According to the City's presentations to the PDC, Link5G installations in historic areas require review and approval of the Landmarks Preservation Commission (LPC) and installations adjacent to public parks require review and approval of the Department of Parks & Recreation (DPR). The DPR approval process is opaque and, as of now, the LPC has not held a public hearing to review these installations. Given the impact of these behemoth towers, the LPC should comment on installations adjacent to individual landmarks, and on the appearance of towers proposed in historic districts and adjacent to individual landmarks, even in an advisory capacity.

The concerns about the towers extend beyond their relationship to historic resources. Overall, the review process for just the initial installations has been piecemeal and confusing, leading to uneven community engagement, and a lack of clarity on the full effects of 5G towers across the City.

We support the goal of bridging the digital divide and providing wireless and cellular services to underserved communities. However, we are concerned that the currently proposed locations do not serve that objective. The public presentation to the PDC were clear in their aim to target underserved communities beyond Manhattan's core and in the outer boroughs. However, neighborhoods such as the Upper East Side and SoHo have been selected for the initial roll-out of the new towers.

In seeking PDC's approval, the City promised that no more than one structure would be installed on any given block and the towers would not be installed closer than 200 feet from each other. And yet some of the proposed sites are in uneven clusters, close to each other, and even on the same block. The vendor has indicated that the sites were chosen based on gaps in carrier coverage. The City should explain how this siting will close those gaps.

There are additional questions about the financing of the towers, which ones will have advertising screens, which ones will replace the older, obsolete kiosks, and where the new towers will be distributed across the entire city.

New York's historic buildings and neighborhoods are beloved by residents and visitors. Their unique appeal will be an integral part of the City's recovery, but we fear that these towers will have severe, negative, and permanent impacts on those resources. We believe digital equity is an important objective, but City agencies and the private vendor have not shown how this roll-out addresses that goal.

We request that you ensure that the policies and processes that have been put in place to implement the installation of new 5G be effectively and consistently enforced. We look forward to further information about this program as soon as possible. Thank you.

Sincerely,



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Municipal Art Society



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The New York Landmarks Conservancy



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