



June 7, 2023

STATEMENT OF THE NEW YORK LANDMARKS CONSERVANCY BEFORE  
THE NEW YORK CITY COUNCIL COMMITTEE ON TECHNOLOGY  
REGARDING LINKNYC: DEPLOYMENT OF 5G INFRASTRUCTURE AND WI-FI  
CONNECTIVITY ACROSS THE CITY

The New York Landmarks Conservancy is a 50-year old organization dedicated to preserving, revitalizing, and reusing New York's historic buildings and neighborhoods. We thank the Council for taking its rightful leadership role and holding this important hearing.

We have significant questions about installation of new 32-foot tall LinkNYC towers and kiosks across the City, and about the chaotic public review process for their approval. We've heard from constituents in neighborhoods across the City and we are sure you and your colleagues have as well.

We wrote to City Hall looking for an explanation. The response was a list of OTI talking points. (Both letters are attached.) We ask for a pause on any future installations until we all get answers. This is a time-sensitive request. We have received notification of several new installations entering a State preservation review process just last week. The foundations and fiber connections are already in place.

As a preservation organization, we believe that the designs are ungainly and will detract 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.

But the concerns go beyond the relationship to historic resources. We think the large towers will have a detrimental impact throughout the entire City. We support the goal of expanding digital equity, but have questions about how the currently proposed locations serve that objective. We are sympathetic to the need to provide improved wireless and cellular technology, especially in "digital deserts" but are unclear about why neighborhoods such as the Upper East Side and SoHo have been selected for the initial roll-out of the new towers.



There are additional questions about the financing of the towers, about which will have advertising screens, where the new towers will be distributed across the entire city. New Yorkers deserve clarity about the churn of technology and the older, 4G kiosks which seem to function mostly as advertising posts, but take up limited sidewalk real estate. Will they be removed? What will happen when technology upgrades make 5G obsolete?

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.

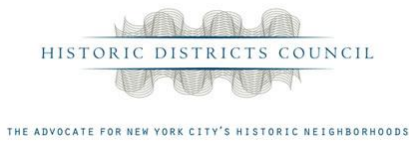
The review process for just the initial installations has been piecemeal and confusing, leading to uneven community engagement, and a lack of clarity on the full effects of 5G towers across the City.

We understand that the Landmarks Preservation Commission has the opportunity to review proposed sitings in historic districts but as of now, there is no date for that hearing. Given the impact of these behemoth towers, the LPC should also have an opportunity to comment on installations adjacent to individual landmarks, and on the appearance of towers that will be located in historic districts and adjacent to individual landmarks, even in an advisory capacity. A review for the impacts on historic resources listed on the State and National Registers of Historic Places is forthcoming, but the City's landmarks agency should also be playing a role.

The Public Design Commission has binding jurisdiction on the design, but even they have open questions about it. In September, PDC Commissioners asked whether the visual impact could be reduced. They pressed the Office of Technology and Information and vendor CityBridge to return to the PDC with a global design comparison, but that has not occurred.

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.

Thank you for the opportunity to express the Conservancy's views.



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,



Frampton Tolbert, Executive Director  
Historic Districts Council



Elizabeth Goldstein, President  
Municipal Art Society



Peg Breen, President  
The New York Landmarks Conservancy



Rachel Levy, Executive Director  
Friends of the Upper East Side  
Historic Districts




Sean Khorsandi, Executive Director  
Landmark West!



Andrew Berman, Executive Director  
Village Preservation



Lo Van Der Valk, President  
Carnegie Hill Neighbors



Sharon Pope-Marshall, Executive Director  
CIVITAS NYC

Cc:

Sreoshy Banerjea  
Executive Director  
Public Design Commission  
City Hall, Third Floor  
New York, NY 10007

Matthew Fraser, Chief Technology Officer  
Office of Technology and Innovation  
2 MetroTech Center, P1  
Brooklyn, NY 11201

Sarah Carroll, Chair  
Landmarks Preservation Commission  
1 Centre Street, 9th floor  
New York, NY 10007



OFFICE OF THE MAYOR  
THE CITY OF NEW YORK

MATTHEW C. FRASER  
CHIEF TECHNOLOGY OFFICER

Executive Director Frampton Tolbert  
Historic Districts Council  
232 E 11th St  
New York, NY 10003

President Peg Breen  
The New York Landmarks Conservancy  
1 Whitehall St  
New York, NY 10004

Executive Director Rachel Levy  
Friends of the Upper East Side Historic Districts  
966 Lexington Ave #3E  
New York, NY 10021

Executive Director Sean Khorsandi  
Landmark West!  
45 W 67th St #1  
New York, NY 10023

Executive Director Andrew Berman  
Village Preservation  
232 East 11th Street  
New York, NY 10003

President Lo Van Der Valk  
Carnegie Hill Neighbors  
1326 Madison Ave  
New York, NY 10128

Executive Director Sharon Pope-Marshal  
CIVITAS NYC  
1457 Lexington Ave  
New York, NY 10128

January 31, 2023

To the Representatives of the above Organizations:

Thank you for your engagement on this matter.

We appreciate your stated interest in bridging the digital divide and providing wireless and cellular services to underserved communities. We share in this interest and believe that New York City deserves to be the most technologically advanced and equitable city in the world and that no neighborhood is left behind. Link5G kiosks, which provide 5G infrastructure, free Wi-Fi and nation-wide calling, connection to 911 and 311, and other digital amenities, are critical to ensuring that New Yorkers and visitors always feel connected and safe, wherever they are in the city. The LinkNYC program has already proven to be a valuable resource in this respect with over 12.6 million free Wi-Fi subscribers and more than 425,000 phone calls made every month from LinkNYC kiosks. During the pandemic, 30% of LinkNYC users said these kiosks were their primary connection to broadband internet.

Wireless networks in New York City – like in most cities around the country – are supported by a combination of antennas on building rooftops and street furniture. With more and more New Yorkers relying on cell phones as their



OFFICE OF THE MAYOR  
THE CITY OF NEW YORK

primary means of connecting to the internet, there is a pressing need to ensure that networks are as robust and resilient as possible.

To select potential locations for Link5G kiosks, our franchisee, CityBridge, works with wireless carriers to identify areas with a need for additional connectivity. Locations are chosen based on existing 5G network coverage and capacity deficiencies as well as an area's ability to broaden the range of LinkNYC's free Wi-Fi network. Proposed sites in residential zoning districts, as well as in historic districts, must have at least one wireless carrier committed to them, thereby ensuring that a wireless network coverage and/or capacity need within the immediate area is being addressed. Once sites are identified, the City conducts an extensive review to ensure that each location meets established siting criteria and is as minimally invasive as possible on the surrounding community. Examples of such criteria include minimum distances from parking meters and subway entrances, and sidewalk clearance requirements, among dozens of others. Siting criteria and other franchise documents are available on OTI's [website](#). As soon as the City ensures that sites meet these requirements, proposed locations are released for public comment. This cadence is intended to engage community stakeholders as early in the process as possible.

You can find lists and maps of current and proposed LinkNYC locations on the City's [Open Data portal](#).

As you note, any proposed sites in historic districts are subject to further review and approval by the Landmarks Preservation Commission (LPC). The Office of Technology and Innovation (OTI) is currently in conversations with LPC, the Public Design Commission (PDC), and other City agencies about additional public review processes. We will share information regarding the timing of further public reviews as soon as it is available.

The City is committed to providing New Yorkers and visitors with the digital tools necessary to succeed in the 21st century. While LinkNYC kiosks will be installed in every community district in the city, the vast majority —more than 90%— will be deployed above 96th Street in Manhattan and in the outer boroughs to help bridge the digital divide.

The team at OTI is more than happy to provide further information regarding the LinkNYC program and the public review processes. If you have additional questions, please feel free to reach out to my colleague, Stacy Gardener ([sgardener@oti.nyc.gov](mailto:sgardener@oti.nyc.gov)), Senior Director of External Affairs.

Thank you,

A handwritten signature in black ink, appearing to read "Matthew C. Fraser".

Matthew C. Fraser  
Chief Technology Officer  
City of New York



OFFICE OF THE MAYOR  
THE CITY OF NEW YORK

Cc:

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

Executive Director Sreoshiy Banerjea  
Public Design Commission  
City Hall, Third Floor  
New York, NY 10007

Chair Sarah Carroll  
Landmarks Preservation Commission  
1 Centre Street, 9th floor  
New York, NY 10007