



June 16, 2025

**Re: Request for Information, Public Infrastructure to Support Digital Equity in
New York City**

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Jessica Dean Schiffer

Linda Yowell

F. Anthony Zunino

232 EAST 11TH STREET

NEW YORK NY 10003

212-475-9585

VILLAGEPRESERVATION.ORG

Village Preservation appreciates this opportunity to submit the following response to the [Public Infrastructure to Support Digital Equity in New York City RFI](#), issued by the New York City Office of Technology and Information:

As a non-profit organization that works to document, celebrate, and preserve the special architectural and cultural heritage of Greenwich Village, the East Village, and NoHo, [Village Preservation](#) is committed to ensuring that any new digital infrastructure is compatible with the architectural and historic character of our neighborhoods, while serving our communities.

We have been strong advocates for [public oversight of new 5G infrastructure](#) in our neighborhoods, and since 2023 have been formally involved in assessing proposed locations for Link5G towers as a consulting party for Section 106 review, a process mandated by the National Historic Preservation Act (NHPA) that requires federal agencies to consider the potential impact of their projects on historic properties. Through this process, we have successfully prevented the installation of several inappropriate, out-of-scale 5G towers in locations in the West Village and the East Village to date.

Regarding the comment solicitation request within this RFI, Village Preservation is particularly invested in responding to Question D), What should the design of the new structures be?

Any new structures must be designed in such a way that they are contextual with the existing historic fabric of our neighborhoods. They should not be overly large, and instead should be as compact as is reasonable while serving their intended purpose. It may be prudent to develop a range of design schemes, so that each proposed location could receive a structure that is particularly appropriate for the specific needs of that location (with consideration to aspects such as appropriateness with regard to materials and finish, scale of surrounding buildings, width of the existing sidewalk, whether the location is in a historic district, proximity of other existing infrastructure, etc.). We request that true public input and engagement be part of the process for all future proposals.

Regarding existing designs, we especially oppose the unnecessary and ungainly Link5G towers, and believe that this technology can be equitably brought to our communities using infrastructure that is much more appropriate for our historic districts and residential-scale neighborhoods. The 32-foot-tall towers are absolutely of an inappropriate scale and materiality for the East Village, West Village, and Meatpacking District, among other parts of New York City, and their design, as well as the design of any future similar structures, should be carefully rethought.

We are particularly concerned about the inappropriate size of the current towers, and their negative impact on sightlines to historic features and properties. We also strongly believe that digital advertising screens should only be included in commercial areas where they might be appropriate, and not be permitted in residential and lower-scale locations, which should only include the minimal amount of equipment necessary to serve the purpose of digital equity. Any plan for the installation of these huge towers or other public technology infrastructure must abide by its actual purported purpose, to serve those lacking in such needed services, rather than simply making money and selling data for the operators. And it must involve true public engagement and input about locations and design.

We look forward to continued transparency and opportunities for input as the City moves forward with this RFI process. Thank you for your consideration of our comments and feedback.