



January 17, 2023

Mayor Eric Adams
City Hall
New York, NY 10007

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

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

Dear Mayor Eric Adams, Hon. Matthew Fraser, and Hon. Sarah Carroll,

Village Preservation is deeply concerned about the lack of oversight and community engagement in the implementation of the LinkNYC 5G tower program and urges that it be stopped and rethought. From the inception of the program to the installation of the first towers last fall, this program has been shrouded in secrecy. In a [New York Times report dated November 5, 2022](#), every single community member interviewed, from Bedford-Stuyvesant to the Upper East Side, was completely taken off guard by the installation and appalled at the size.

The Office of Technology and Innovation (OTI) states in their [public presentations](#) that they are committed to a “robust public process,” but notes in the same slide that the input of external stakeholders is purely “advisory” and that all “limitations to siting are subject to waiver by the Commissioner in their sole discretion.” It is unclear whether this [veto power extends to decisions made by other city agencies](#) like the Landmarks Preservation Commission (LPC), the Department of Parks and Recreation (DPR), and the Department of Transportation (DOT) who share regulatory power over the siting of these towers. The opacity surrounding the regulatory framework of the LinkNYC 5G tower program is disturbing, particularly given how frequently these are proposed to be located just outside residential windows and in historic districts or near landmarks.

Two key components of the [September 12, 2022 Public Design Commission \(PDC\) Resolution](#) approving the design of LinkNYC 5G towers are the LPC’s jurisdiction over the siting of the towers along with the requirement that OTI research and develop a

design more suitable to residential areas and historic districts. Thus far, there is no clear framework or timeline for how the siting of the towers will be evaluated by the LPC. In our independent communications with the LPC, we have been assured that the proposed sites of LinkNYC 5G towers in historic districts will be presented at a public hearing “in the near future.” While we are relieved to know that the placement of these structures will be evaluated in a public forum, we are still troubled by the lack of a clear process for review. One failure of the review process is that many Community Board committees handling LPC Certificate of Appropriateness applications have been entirely left in the dark about their role in the siting process, cutting out a crucial step in the community engagement process. When it comes to the required research and proposal for a design more appropriate to residential areas and historic districts, there is no set timeline for the development and implementation of a new design in these areas. Since this is a requirement in the PDC’s approval of the design, the program should not be able to move forward until a clear plan for design development and implementation is released.

Additionally, while the program purports to be aimed at bridging the “digital divide” and bringing service to “digital deserts” found largely in lower-income communities – a laudable goal – the initial rollout includes concentrations of these ungainly oversized towers in neighborhoods like the West Village, the Meatpacking District, SoHo, and the Upper East Side – neighborhoods clearly not lacking in such services. It is unclear why the City would choose to locate or concentrate these towers here, other than for potential monetization of them from sale of data or space or both by the private commercial operator.

There are a number of serious issues surrounding the LinkNYC 5G tower program that extend well beyond the lack of meaningful community engagement and clear regulatory framework. These issues include, but are not limited to: the lack of transparency around the strategy and reasoning for the siting plan of the towers; the oversized upper chambers topping the poles [allowing CityBridge the opportunity to lease this space to numerous telecom companies](#), allowing new revenue stream for a private company at the expense of public space; the detrimental impact these hulking towers will have on the already lacking ADA accessibility of New York City’s sidewalks; and the [incriminating 2021 audit of LinkNYC and OTI](#) performed by the New York State Comptroller’s office uncovering a gross mishandling of funds and a bevy of broken promises which OTI flippantly dismissed but did not offer any convincing evidence to the contrary.

Village Preservation strongly urges the City of New York to reconsider the rash and hurried implementation of the LinkNYC 5G tower program.

Sincerely,

A handwritten signature in blue ink, appearing to read "Andrew Berman".

Andrew Berman
Executive Director

CC:

Deputy Mayor Meera Joshi

Leslie Brown, External Affairs & Communications, Office of Technology and Innovation

Manhattan Borough President Mark Levine

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