



SAVE
GANSEVOORT



September 14, 2023

Sara C. Bronin
Chair
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, DC 20001

Dear Chair Bronin:

We write to you collectively, representing a wide variety of preservation organizations in New York City. As I am sure you have been informed, many of our organizations are Consulting Parties to the current FCC 106 process for the installation of 5G Towers in New York City. Ultimately 2,000 towers will be installed in New York City over the life of the program.

The installation of the first phase of the project involving 300 towers has been temporarily halted because our organizations were being inundated with huge amounts of information on a tower-by-tower basis with very little context or seeming rhythm or reason. The City's stated intention is to better serve areas of the city that have less access to digital resources. At the moment, none of our organizations are able to understand how that worthy goal would be achieved by this project because the project seems to be proceeding in a haphazard manner.

We have made some progress with the purveyor of the New York City project. Just today they shared draft material we have requested from them, such as citywide maps and lists of installations.

However, we remain troubled by the fundamental constraints imposed on this undertaking by the FCC's Nationwide Programmatic Agreement (NPA.) We believe this raises some basic policy issues that we hope that ACHP will opine on.

Here are the most significant of those that we have identified so far:

- **The NPA not designed for large urban undertakings:** The scale and nature of the undertaking and the unusual quality and quantity of historic resources (of Federal, State and New York City significance) in question seem to warrant a more nuanced approach than the NPA allows. New York City is presumably not the first large city confronting this issue, and certainly will not be the last.
 - The terms of the NPA did not encourage project overview or context setting that would normally have taken place in the process of negotiating the terms of a Programmatic Agreement with the Consulting Parties.
- **The NPA does not treat the project as a single undertaking:** Each tower is being treated as a single undertaking and not evaluated in the context of others that may be just blocks away. This makes it especially difficult to evaluate the impacts on historic districts which can be many blocks in size.
- **Phase I of the project is only 300 towers:** 300 towers is less than 15% of the towers that will be installed in New York City. Besides questions of segmentation, which may be relevant here, the practical consequence of a project sequenced over this long a time period, is that the impacts are hard to assess. This is not just an issue for historic resources but also other environmental impacts.

We have been discussing this matter with the FCC and the NY State Historic Preservation Office, and respect that you play a different role than those two agencies do. However, all of us have had experiences that lead us to believe that the ACHP's active participation in this case may help reach a productive conclusion more quickly, which is important to all of us. We do think that this case is of national importance and would greatly appreciate the ACHP's assistance in evaluating the issues that we have raised in this letter.

We would welcome an opportunity to discuss these issues with you further.

Sincerely,



Frampton Tolbert, Executive Director
Historic Districts Council



Elizabeth Goldstein, President
Municipal Art Society



Peg Breen, President
The New York Landmarks Conservancy



Anna Marcum
Friends of the Upper East Side
Historic Districts



Sean Khorasandi, Executive Director



Andrew Berman, Executive Director



Lo Van der Valk
Carnegie Hill Neighbors, President



Sharon Pope Marshall
CIVITAS, Executive Director



Zack Winestone
Save Gansevoort, Co-Founder

A handwritten signature in cursive script that reads "Claudette Brady".

Claudette Brady

Save Harlem Now, Executive Director

cc.

Daniel McKay, New York State Historic Preservation Officer

Sarah Carroll, New York City Landmarks

US Senators Gillibrand and Schumer

Congressman Nadler