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Rachel Levy
EXECUTIVE DIRECTOR

December 23, 2022

Hon. Lorraine Grillo, First Deputy Mayor
Office of the Mayor
City Hall
New York, NY 10007

Hon. Philip Aarons, Vice President
Public Design Commission
City Hall, Third Floor
New York, NY 10007

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 Officials of the City of New York,

FRIENDS is an independent, not-for-profit membership organization, founded in 1982, dedicated to preserving and celebrating the architectural legacy, livability, and sense of place of the Upper East Side. We are writing to express broad concerns regarding the 18 sites proposed for the installation of 32-foot LinkNYC kiosks at 18 sites throughout the Upper East Side, including 13 in the neighborhood’s Historic Districts.

We understand and support the City’s goals to expand digital equity. However, the proposed sites do not serve that objective, and will further clutter the neighborhood’s sidewalks with ungainly street furniture. In addition, the 5G towers are wholly inappropriate within the Upper East Side, Metropolitan Museum, Carnegie Hill, and Park Avenue Historic Districts and out of keeping with the special character and aesthetic interest of these areas. We urge the City to seek to minimize the visual impacts throughout the neighborhood, and especially in Historic Districts.

FRIENDS is concerned that the design of the towers, although they have been subject to the public design review process, could be refined and improved. Commissioners at the PDC's latest discussion in September continued to question whether the visual impact could be further reduced, pressing OTI and CityBridge to return to the PDC with a global design comparison which has not yet occurred. We understand that PDC has binding jurisdiction on the design of these installations, but we would urge the LPC to opine on the design for structures in historic districts in an advisory capacity. The LinkNYC kiosks were first reviewed at LPC years ago under a different iteration of the plan, and before the three-story 5G towers were incorporated into the design.

Current designs of both the tower version and the tower with advertising screens are not appropriate in appearance or scale for either the residential areas where they are proposed or in the commercial areas, especially the narrow sidewalks and lower scale buildings on Madison Avenue. Furthermore, the planned advertising screens go against LPC's masterplan for Madison Avenue storefronts, which prohibits the installation of flashing digital screens in shop windows. Presentations made to the PDC as recently as August 2022 clearly indicated that no advertising screens would be installed in residential zoning districts and historic districts. However, CityBridge presented a different vision at the recent hearings held by CB8, stating the intent to install ad kiosks in five sites within historic districts (46 East 91st Street, 1354 Madison Avenue, 24 East 63rd Street, 688 Madison Avenue, and 30 East 64th Street).

The towers without the advertising screens still pose significant concerns. It is hard to see how a 32-foot tower will fit into the existing context along Madison, Fifth, and Park Avenues and throughout Carnegie Hill, not to mention in front of individual landmarks and institutional sites including the Knickerbocker Club (Fifth Avenue and 62nd Street), the Metropolitan Museum (1000 Fifth Avenue), and the Carnegie Mansion (1095 Fifth Avenue). We are also concerned about the siting of 5G towers along the congested crosstown thoroughfares of 86th Street (1050 Fifth Avenue, 1040 Park Avenue) where bus stops and more already crowd the sidewalk.

While we are sympathetic to the need to provide improved wireless and cellular technology, especially in neighborhoods that are identified as "digital deserts" where residents have sparse and unreliable cellular services, we are unclear about why the Upper East Side has been selected for the initial roll-out of the new 5G towers. When Mayor Adams unveiled the plan in July this year, his press release stated that most of the new kiosks "will be located in... areas that are affected by the digital divide." Indeed, the CityBridge franchise agreement is clear "at least 90% of new structures must be installed in Manhattan above 96th Street and in the Bronx, Brooklyn, Queens, and Staten Island."¹ Among the 280 new sites currently in the permit process for the Link5G pilot, there are 31 sites in Manhattan south of 96th Street, and of those, 58% are located on the Upper East Side. There has been no convincing explanation about this uneven geographic focus. Upper East Side would hardly qualify as lacking in cellular or wireless coverage. The clear cherry-picking of tower locations must be motivated more by revenue earned by selling advertising space and leasing out transmission facilities to carriers.

¹ Amendment 3 page 7: <https://www.nyc.gov/assets/oti/downloads/pdf/linknyc-franchises/linknyc-public-communications-structure-franchise-agreement-amendment-3.pdf>

There has also been no real discussion of the uneven clustering of proposed sites. Why, for example, are five sites within a single block from each other in the East 60s necessary? Similarly, several of the Carnegie Hill sites are located on opposite ends of the very same block. The vendor indicated in discussions with CB8 that the sites were chosen based on gaps in carrier coverage. Can the City demonstrate data regarding those gaps in coverage?

In addition, when will sites be proposed for the rest of the Upper East Side, and the rest of the city, for that matter? Segmenting the review and approval process for various parts of the community does not facilitate a holistic study of the impact across the neighborhood, and unevenly privileges neighborhoods with the capacity to organize.

Once again, we believe digital equity is an important objective. But we fail to see how this initial roll-out serves that goal. Thank you in advance for the additional clarification on the issues raised above.

Sincerely,

A handwritten signature in black ink, appearing to read "Rachel M. Levy". The signature is fluid and cursive, with a long, sweeping tail on the final letter.

Rachel Levy
Executive Director

Cc:

Council Member Keith Powers, New York City Council District 4
Council Member Julie Menin, New York City Council District 5
Borough President Mark Levine, Manhattan
Russell Squire, Chair, Community Board 8
Matthew Bauer, President, Madison Avenue BID