



December 21, 2022

Mr. Erik Kulleseid  
New York State Historic Preservation Officer  
Commissioner of the Office of Parks, Recreation and Historic Preservation  
1 Delaware Avenue North  
Cohoes, NY 12047

Dear Commissioner Kulleseid:

I am writing to request, as per Section 106 of the National Historic Preservation Act of 1966, that you review the impacts of the proposed installation of Link5G Cellular Towers on the sidewalks of the Upper East Side Historic District (designated to the National Register of Historic Places on September 7, 1984 and expanded on September 12, 2006).

While there are plans to install Link5G Cellular Towers in other historic districts in New York City, the three proposed within the Madison Avenue Business Improvement District (at 688 Madison Avenue, 24 East 63 Street and 30 East 64 Street) are all within the Upper East Side Historic District. In all, there is a plan to install eleven Link5G Cellular Towers either within the Upper East Side National Register Historic District, or in within other National Register Historic Districts in our neighborhood.

The federal action that triggers Section 106 review is that the towers shall provide Millimeter Wave Bays for Ultra-Fast 5G service, which shall be operated in partnership with various wireless carriers. 5G broadcast services are regulated by the Federal Communications Commission (FCC).

The Office of Technology & Innovation of The City of New York awarded CityBridge a franchise agreement to install new, 32-foot tall kiosks throughout the City to provide improved 5G and WiFi services. The kiosks include an information panel for telephone calls and cell phone charging ports. It is also our understanding that CityBridge wishes to place large digital advertising panels on Link5G towers located in front of commercially-zoned buildings within historic districts, although approval for those advertising panels has not been granted as of this time.

We recognize that the First Amendment to Nationwide Programmatic Agreement for the Collocation of Wireless Antennas to address the review of deployments of small wireless

antennas and associated equipment under Section 106 of the National Historic Preservation Act, amended the Nationwide Programmatic Agreement for the Collocation of Wireless Antennas to account for the limited potential of small wireless antennas and associated equipment, including Distributed Antenna Systems (DAS) and small cell facilities, to affect historic properties.

However, these 32-foot towers are not collocated on existing towers, buildings, or other non-tower structures. Rather these installations will be new, and shall be permanently installed on the sidewalks directly touching buildings located within the Upper East Side Historic District. We contend that these towers will permanently change the character of the District's setting, and will introduce incompatible visual and atmospheric elements to the District and the historic buildings therein.

We would be pleased to provide you with further information.

Cordially yours,

A handwritten signature in black ink, appearing to read 'MB', with a long horizontal flourish extending to the right.

Matthew Bauer, Ph.D.  
President  
212-861-2055  
mbauer@madisonavenuebid.org

CC: Advisory Council on Historic Preservation  
Hon. Jerrold Nadler, U.S. Representative  
Hon. Liz Krueger, NYS Senate  
Hon. Mark Levine, Manhattan Borough President  
Hon. Keith Powers, NYC Council  
Executive Director Sreoshy Banerjea, Public Design Commission of the City of New York  
Chair Sarah Carroll, NYC Landmarks Preservation Commission  
Commissioner Matthew C. Fraser, New York City Office of Technology and Innovation  
Commissioner Kevin Kim, NYC Department of Small Business Services  
Leslie A. Brown, New York City Office of Technology & Innovation  
Will Brightbill, Manhattan Community Board 8