1. Introduction

This is an application by Queens Future LLC (the "QF Applicant") and the City of New York (the "City;" collectively, the "Applicants") for certain land use actions to facilitate development of the asphalt surface parking lots adjacent to Citi Field (Queens Block 1787, Lot 20 and p/o 1; Block 2018, Lot 1500)[1] (the "Development Site"). The proposed land use actions include:

(i) city map amendments to:

a. Demap parkland corresponding to the area of a proposed entertainment and commercial development, which would be leased to the QF Applicant, and a relocated highway ramp;
b. Demap portions of streets within the existing boundary of Grand Central Parkway corresponding to site access improvements, which would be leased to the QF Applicant, and park improvements;
c. Map new streets corresponding to a relocated ramp to the westbound Grand Central Parkway; and
d. Map new parkland corresponding to park improvements within the existing boundary of Grand Central Parkway.

(ii) a zoning map amendment to map a portion of the Development Site in a C8-4 commercial zoning district.

These land use actions would facilitate the redevelopment of the surface parking lots into a new recreational, commercial and entertainment hub on the Development Site (the "Proposed Development"). In order to achieve that transformation, the QF Applicant is seeking a gaming facility license pursuant to the state-led competitive application process for the award of casino licenses in downstate New York. The proposed land use actions, in conjunction with the recently adopted Gaming Facility Text Amendment, would allow the New York State Gaming Facility Location Board to consider an application by the QF Applicant for a gaming facility on the Development Site.

2. Background

a. History of the Development Site and Willets Point

For most of the late nineteenth and early twentieth century, the Development Site was an industrial dumping ground and landfill. F. Scott Fitzgerald famously referred to the dump as the "valley of ashes" in *The Great Gatsby*.

The Development Site was later paved and served as a parking lot for the 1938 World's Fair, which was held on a site directly south. Afterwards, the Development Site continued to operate as a parking lot.

In 1961, the City of New York and the New York Mets entered into an agreement providing for the development and operation of a 56,000-seat stadium on the site of the parking lot. The state enacted legislation that authorized the City to enter into agreements for the use of the new stadium and surrounding parking lots. The site was leased to the Metropolitan Baseball Club, Inc., and William A. Shea Municipal Stadium opened on April 17, 1964. Also in 1964, the World's Fair was again held on the site to the south and the parking lots adjacent to Shea Stadium were used for World's Fair parking. In 1967, both the Development Site and fairgrounds to the south were established as Flushing Meadows-Corona Park.

In 2006, the City and the Mets (acting through Queens Ballpark Company, L.L.C.) undertook the redevelopment of the stadium site. The Mets constructed a new 42,000-seat stadium named Citi Field in the parking lot adjacent to Shea Stadium and demolished Shea Stadium. The parking spaces on the remaining western, northern and southern portions of the

[1] The Development Site includes a small area without a tax lot designation within mapped Northern Boulevard.

stadium site, as well as on the parking lot south of Roosevelt Avenue, constitute the Development Site.

The area of Willets Point east of the Development Site has long been known for its many auto repair businesses and junkyards, and there is a long history of redevelopment efforts by the City. In 2008, the City approved the Willets Point Development Plan and established the Special Willets Point District. In 2013, the City's designated developer proposed changes to the plan in conjunction with a proposal to develop an entertainment and retail center on the Development Site. In 2017, the New York Court of Appeals determined that the 2013 proposal could not proceed without the adoption of additional parkland alienation legislation by the state legislature. The 2013 proposal did not move forward, and the City proceeded with revising plans for the original redevelopment area east of the Development Site. In 2018, the City announced the commencement of an initial as-of-right phase of the Willets Point development referred to as Phase 1. On April 11, 2024, the City Council voted to approve a number of land use actions to facilitate the development of a Phase 2 project.

b. Gaming Facilities in Downstate New York

In 2013, New York State voters approved a referendum to allow the Legislature to authorize up to seven casinos for the purposes of promoting job growth, increasing aid to schools, and investing in mass transit through revenues generated. In 2022, the state legislature passed legislation authorizing the award of up to three licenses for casinos in downstate New York, including within the five borough of New York City and the surrounding counties. Under the law, the Gaming Facility Location Board oversees the application and selection process and forwards applications to the New York State Gaming Commission to make the final licensing determination. On January 3, 2023, the New York State Gaming Facility Location Board issued a Request for Applications to develop and operate a gaming facility. As provided in the legislation and RFA, every application will be subject to review and approval by a local Community Advisory Committee (CAC). In New York City, the CAC for each proposed gaming facility consists of members representing the governor, the mayor, the local state assembly member, the local state senator, the borough president, and the local city council member.

On April 18, 2024, the City Council adopted a zoning text amendment referred to as the Gaming Facility Text Amendment. This text amendment is intended to facilitate the state-led process, avoid duplicative reviews, and provide an even playing field among city sites. Before the text amendment was adopted, the Zoning Resolution did not include a gaming facility as a permitted use in any zoning district. The text amendment allows a gaming facility as a permitted use in C4 through C8 commercial districts and manufacturing districts if operating under a gaming license issued by the New York State Gaming Commission. It further provides that a gaming facility, as licensed by the Gaming Commission, shall be deemed to have satisfied all applicable regulations of the Zoning Resolution.

3. Description of the Surrounding Area

The area within a 600-foot radius of the Project Area (the "Surrounding Area") is located in Willets Point in Queens. A substantial portion of the Surrounding Area is occupied by several major roadways and transportation and utility-related uses.

The Development Site is bordered to the north by Northern Boulevard and the Whitestone Expressway mainline and ramps, which together form approximately 17 lanes of elevated roadway. Northern Boulevard is the name of a NYC DOT-maintained portion of NY 25A, a state highway that runs east-west starting near the Queens-Midtown Tunnel and continuing along a portion of the North Shore of Long Island. The Whitestone Expressway connects at the eastern end of the Willets Point peninsula with I-678, which runs north-south from John F. Kennedy International Airport to the Bruckner Interchange in the Bronx.

North of the elevated roadways are open space and parking uses adjacent to Flushing Bay—as well as a portion of Flushing Bay itself at the northern tip of the Surrounding Area. The open spaces include the World's Fair Marina, a public marina managed by the Parks Department, and a segment of Flushing Bay Promenade, which winds along Flushing Bay from LaGuardia Airport to the Willets Point Peninsula. There are more than 1,000 parking spaces located to the

east and west of the marina, which are partially used for Mets parking on game days and are otherwise available for park visitors.

The Development Site surrounds and is directly adjacent to Citi Field.

The Willets Point development is east of the Development Site. It is mapped in a C4-4 commercial district in the Willets Point Special District. The area has long been improved with a mix of small, low-scale auto-related and light industrial uses. The Willets Point area is planned for redevelopment into a multi-phase mixed-use development. Construction of Phase 1 of the development began in December 2023; Phase 1 will include 1,100 units of affordable housing, a new public school, and retail and supporting community facility space. Phase 2 will include a 25,000-seat soccer stadium for New York City FC, 1,400 units of affordable housing, a 250-room hotel, and 2.8 acres of publicly accessible open space. The soccer stadium is expected to open in time for the 2027 Major League Soccer season.

South of the Development Site are large lots occupied by the MTA Corona Rail Yard and Casey Stengel Bus Depot. These large lots are mapped in a M1-1 zoning district. The rail yard contains storage for subway cars and repair shops. The bus depot contains bus parking and supportive uses, including a maintenance facility. The Olmsted Center is located in the southwestern corner of the Surrounding Area in mapped parkland; it includes several buildings used as office space for the Department of Parks and Recreation (DPR) and parking areas used by DPR staff. The Rail Yard, Bus Depot and Olmsted Center separate the Development Site from the recreationally active portions of Flushing Meadows Corona Park located further south, outside of the Surrounding Area boundary. Among other facilities, this recreationally active southern portion of the park include the United States Tennis Association (USTA) Billie Jean King National Tennis Center (USTA Tennis Center), which is located approximately 1,200 feet from the Development Site. A pedestrian walkway, known as the Passerelle Bridge, spans the Rail Yard and Bus Depot connecting this southern portion of Flushing Meadows Corona Park to the MTA No. 7 line station at Roosevelt Avenue and Citi Field.

The Grand Central Parkway borders the western boundary of the Development Site and contains eight lanes. The Grand Central Parkway is a NYCDOT-maintained parkway that stretches from the Triborough Bridge to Nassau County and runs adjacent to LaGuardia Airport and along the western edge of Flushing Meadows-Corona Park.

The Corona neighborhood is located on the other side of the Grand Central Parkway from the Development Site. The Surrounding Area includes a roughly one-half-block wide stretch of Corona west of 114th Street from 37th Avenue to 43rd Avenue. This area is mapped with a R6 district along 114th Street, a R5A district mapped further west at the western boundary of the Surrounding Area, and a R6B/C2-4 district along Roosevelt Avenue. This area predominantly consists of a mix of residential buildings, both one- and two-family buildings as well as multi-family buildings. The portion along Roosevelt Avenue has a mix of uses, including an office building, a hotel, auto-related uses, a church, a construction materials store, and other commercial uses.

There are a number of public transit options serving the Development Site. The No. 7 subway line has a stop at the Mets-Willets Point station and the Port Washington Branch of the Long Island Rail Road has a stop at Mets-Willets Point. The Q48 bus runs from LaGuardia Airport to Flushing and has several stops adjacent to the Development Site, including Roosevelt Avenue/Willets Point Blvd Station and Roosevelt Avenue/126th Street. The Q19 bus connects Astoria to Flushing and has a stop at Northern Boulevard/126th Place, one block from the Development Site. The Q66 bus connects Long Island City to Flushing and also has a stop at Northern Boulevard/126th Place.

4. Description of the Development Site

The Development Site is approximately 78 acres of land bounded by Seaver Way to the east, the Metropolitan Transportation Authority Corona Yard to the south, Grand Central Parkway to the west, and Northern Boulevard to the north.

The Development Site contains surface parking lots with 7,423 spaces for visitors to Citi Field, which is located east of the Development Site. The Development Site is bisected by the MTA 7 subway line along Roosevelt Avenue. The portion south of Roosevelt Avenue contains, in addition to the parking lots, three small MTA structures associated with the subway line. Vehicles accessing the surface parking lots on the Development Site arrive from the surrounding roadways from all directions. The Development Site encompasses Shea Road, a park road, which runs around the perimeter of the parking lots, connecting to Roosevelt Avenue and Seaver Way.

The large majority of the Development Site is part of Flushing Meadows Corona Park and is mapped parkland. A small portion is located within the boundary of Grand Central Parkway and another small portion is located within the boundary of Northern Boulevard. By virtue of its status as parkland and street, the Development Site is currently not subject to zoning.

The City of New York owns the Development Site. State legislation enacted in 1961 authorized the City to enter into agreements with private parties for the use of a stadium and parking lots on the Development Site and the site of Citi Field. As authorized by the legislation, Queens Ballpark Company, L.L.C. leases the Development Site and operates the parking lots.

The surface parking surrounding Citi Field is used only on game days during baseball season (generally April through October), for other private events held at Citi Field, and for certain other scheduled events in Flushing Meadows Corona Park, including the U.S. Open.[2] Up to 1,795 spaces are designated for commuter parking on business days. The parking lots create a physical barrier between neighborhoods and leaves the area immediately surrounding Citi Field with few opportunities for recreation, dining or entertainment.

5. Description of the Project Area

The Project Area (Queens Block 1787, Lot 20 and p/o 1; Block 2018, Lot 1500, p/o 500, p/o 1000; Block 1789, Lot 65)[3] extends slightly beyond the Development Site and includes additional property that would contain roadway improvements, highway access improvements, and improved connections to the Mets-Willets Point subway station, as discussed below.

6. Description of the Proposed Development

The Proposed Development would be a major new entertainment, commercial and recreational complex. The Proposed Development would have a maximum of approximately 3.7 million gross square feet; it would contain a hotel with up to 2,300 rooms, a gaming facility, a music hall with over 5,000 seats, convention and meeting space, restaurant and retail space, office, and community facility space. The Proposed Development would also include structured parking facilities with up to 13,750 spaces. At least 20 acres of the existing parking lots would be improved as public park space.

a. Buildings

The Proposed Development is anticipated to include two buildings with primarily commercial uses. The QF Applicant would construct Development A on the western portion of the Development Site. It would include a music hall, gaming facility, a hotel with up to 2,300 rooms, convention and meeting space, retail, and restaurants. The first two floors would be used for parking. A podium portion of Development A would rise to a height of approximately 120 feet. It would contain the music hall, gaming facility, convention and meeting space, retail, and restaurants. Above the podium, multiple tower portions containing hotel rooms would rise to various heights with a maximum height of 344 feet. The footprint of Development A and adjacent driveways is approximately 23 acres. The primary vehicular access point is located at the northwest corner of the building, providing direct access from Grand Central Parkway. The primary pedestrian entrance/exit to Development A would be located at the southeast corner of

[2] There are temporary pop-up ticketed events, such as outdoor movie nights and carnivals, that operate on the parking lots on the Development Site on a seasonal basis under temporary agreements. None of these events have long term contracts to operate.
[3] The Project Area includes areas without tax lot designations along Boat Basin Place under Northern Boulevard and near the intersection of Northern Boulevard and Seaver Way.

the building, adjacent to Roosevelt Avenue and the Mets/Willets Point subway station. An additional entrance would be located at the northwest corner off of Shea Road.

Development B would be located just south of Citi Field. It would contain uses geared towards local visitors, including restaurant, retail, community space and administrative office. It would also include parking on the lower levels. The building would rise to a maximum height of 130 feet. The pedestrian entrance/exit is anticipated to be located on the western side of the building adjacent to the subway station.

The QF Applicant would also construct two additional parking garages. One garage, Development D, would be located north of Citi Field. The other garage, Development C, would be located south of Roosevelt Avenue at the southeastern corner of the Project Area east of the subway station. Both would have a maximum height of 145 feet. There would also be a surface parking lot south of Roosevelt Avenue adjacent to Development C. In total, the Proposed Development would contain up to 13,750 parking spaces, accommodating both the parking needed by the Mets to continue operating at Citi Field and the parking needed to support the new development. These parking facilities will be made available for attendees of events at the New York City FC stadium. They would also be available for commuter parking and for attendees of events at the USTA National Tennis Center and in Flushing Meadows Corona Park in accordance with the existing lease with Queens Ballpark Company, L.L.C.

b. Public Park

The Proposed Development would include at least 20 acres of new landscaped and programmed public park space, on land that, though today mapped as park, is an asphalt parking lot. A large, approximately 10-acre portion of the new park space would be located in the center of the Development Site and oriented north to south. With this orientation, the Development Site would provide—for the first time—direct public pedestrian access from the MTA station and southern portion of the Flushing Meadows Corona Park to Flushing Bay to the north.

The final design and programming of the public park is subject to review and approval by the Parks Department. The illustrative plan proposed by QF Applicant includes the following elements: The central open space would contain a one-acre lawn, an outdoor event space, gardens, moveable seating, picnicking areas, and multiple tree-lined promenades. The public park space would include several other areas, each with a distinctive character. South of Roosevelt Avenue, a 3.8-acre park space would be improved for active recreation, including courts for racket sports, soccer fields, playgrounds, and a fitness area. In addition, a linear open space along the northern curb of Roosevelt Avenue is planned for smaller-format sports courts as well as seating and walkways. A large passive recreation area would be provided at the northwestern corner of the site. Another open space area would be located at Seaver Way; it would include a flexible plaza area to support events throughout the year such as farmer's markets.

The QF Applicant would be required to maintain the public park space in accordance with DPR standards.[4] Public restrooms would be provided within the public park space. The façade of Developments A and B at ground level will be designed to complement and enhance the public park space both visually and programmatically.

c. Transit, Bike and Pedestrian Improvements

Comprehensive transit, bike and pedestrian improvements would enhance connections to the surrounding neighborhood and open space amenities. The QF Applicant proposes improvements to the Mets-Willets Point No. 7 subway station. Elevators would be constructed between the station mezzanine and street level and between the mezzanine and platforms. Fare control areas and corridors would be redesigned and expanded. The improvements would make the station fully ADA accessible. On the north side of the station, the mezzanine level of the subway station would directly connect to a central staircase leading to the Citi Field rotunda at

[4] Portions of the public park space adjacent to Citi Field—a 10-acre north-south oriented central open space and a flexible plaza area south of City Field—would remain under the existing lease to Queens Ballpark Company, L.L.C.; the other portions would not be leased.

the southern end of the 10-acre portion of the new park space as well as a pedestrian bridge and a ramp providing additional access to the development and park space.

The QF Applicant also proposes a suite of bike and pedestrian improvements. Bicycle lanes would be included along Roosevelt Avenue, Shea Road, near Stadium Place North and under the Whitestone Expressway to create protected bike lane connections along the northern, western, and southern edges of the Development Site. A shared path is proposed from Boat Basin to Seaver Way within the northeastern portion of the Development Site to connect to the proposed bike lanes in the Willets Point neighborhood. Dedicated bike signals would be provided at major intersections and high-traffic areas.

Pedestrian improvements will help draw visitors to the new public park space as well as improve the connection between the southern portion of Flushing Meadows Corona Park and Flushing Bay Promenade. On the northern boundary of the Development Site, a pedestrian and bike bridge would replace the existing at-grade crosswalk at the ramp from the Grand Central Parkway, enhancing safety and strengthening the connection to Corona and the waterfront. Another pedestrian bridge would be provided over Shea Road and connect to a protected bike and pedestrian way underneath the Whitestone Expressway. New lighting would be added to this pathway to enhance safety. On the southern boundary of the Development Site, the midblock crosswalk on Roosevelt Avenue would be widened and a new crosswalk would be installed further west at Stadium Place South. New lighting under the elevated subway tracks over Roosevelt Avenue would improve safety and the overall pedestrian experience.

d. Roadway Improvements

The Proposed Development would also include a number of roadway improvements. In particular, the QF Applicant would relocate an onramp to the westbound Grand Central Parkway. The existing onramp is immediately adjacent to the Development Site and a short distance from the offramp that leads to Shea Road, creating a substandard weaving section. The onramp would be relocated further north, starting on the northwest corner of the Development Site, running under Northern Boulevard and along the southern edge of a marina parking area. The relocated ramp entrance would be approximately 750 feet from the existing location. Separating the onramp and offramp and removing the weaving section will enhance the safety and overall capacity of the ramp system. The Proposed Development would also include the realignment of Shea Road to intersect with Seaver Way at 35th Avenue instead of 34th Avenue to allow for enhanced safety and higher throughput. Modifications would be made to the intersection of Northern Boulevard and Seaver Way and to Stadium Place North to improve safety. Improvements would be made along Olmsted Drive, which is in the portion of Flushing Meadows Corona Park south of the Development Site, to enhance vehicular access for visitors to Flushing Meadows Corona Park and Parks Department staff. These modifications include the introduction of a new signal at the intersection of Olmsted Drive and Shea Road and widening the roadway of Olmsted Drive to four lanes.

e. Resiliency

Resiliency is central to the Proposed Development. Replacing impermeable surface parking with landscaped open space and floodplain-compliant buildings would reduce stormwater runoff, enhance biodiversity and mitigate the heat-island effect. The first occupiable floor in Developments A and B would be designed to an elevation of 20 feet NAVD88, which is 12 feet above site elevation, to incorporate possible future revisions to the base flood elevation. The uses in these buildings located at or below the design flood elevation would be restricted to parking and loading. All of the new buildings would provide rooftop solar panels and softscape.

f. Summary

The Proposed Development is an opportunity to transform parking lots into a unique mixed-use recreational, commercial, and entertainment hub, helping to deliver on the economic potential a major sporting facility offers to Queens. The Proposed Development would increase tourism, enhance the visitor experience, and create thousands of quality jobs for area residents. The 20 acres of public park space would provide a major new amenity to local residents, including residents of Flushing, Corona, Jackson Heights, Elmhurst, and the Willets Point neighborhood as well as visitors.

7. Actions Necessary to Facilitate the Project

With this application, the Applicants seek two land use actions to facilitate the Proposed Development:

a. City map change. The Proposed Development requires several changes to the official city map as follows:

i. *Demapping of parkland corresponding to the area of a proposed entertainment and commercial development and a relocated highway ramp*

The large majority of the Development Site is mapped parkland. To allow for the commercial uses proposed for Development A, the footprint of Development A, which is located on the western portion of the Development Site, would be demapped as park. The demapping boundary would align with the perimeter of the public park space to the east and south of Development A and would align with the sidewalk adjacent to Shea Road to the north and west. The demapping area would extend to include driveways and ramps that access Development A. This demapped area would remain owned by the City and be ground leased to the QF Applicant.

For utility service, Development A will require sub-surface lateral connections to utility and sewer lines located in Shea Road and the surrounding streets. The alteration map identifies an area within which the City may grant one or more easements for the purpose of locating subsurface utility connections.

As discussed above, the Proposed Development includes the relocation of a ramp to the Grand Central Parkway. A portion of the relocated ramp extends into current mapped parkland directly north and south of Northern Boulevard; these areas would be demapped as park. These areas would remain owned by the City and would be managed as part of the state arterial system.

Altogether, approximately 25 acres of parkland would be demapped to facilitate the proposed commercial development and roadway changes. As a matter of state law, the state legislature must authorize the alienation of parkland.

ii. *Demapping of street corresponding to site access improvements and park improvements within the existing boundary of Grand Central Parkway*

As part of the site access improvements, a ramp would extend from Shea Road to a primary entrance to Development A located on its western facade. A portion of this ramp would extend into the current boundary of Grand Central Parkway and would be demapped as street. Like the rest of Development A, the area occupied by this portion of the ramp would remain owned by the City and be ground leased to the QF Applicant.

In addition, the westernmost portion of the park area planned at the northwest corner of the Development Site extends into the current boundary of Grand Central Parkway. This portion would be demapped as street. It would remain owned by the City; the City would terminate the existing lease to Queens Ballpark Company, L.L.C. for this area.

Altogether, approximately 1.2 acres of street would be demapped.

iii. *Mapping of street corresponding to a relocated ramp to the westbound Grand Central Parkway*

As discussed above, a ramp to the westbound Grand Central Parkway would be relocated and the portions extending into existing mapped parkland would be demapped as park. These same portions would be mapped as street. The relocated ramp would be owned by the City and would be managed as part of the state arterial system.

iv. *Mapping of parkland corresponding to park improvements within the existing boundary of Grand Central Parkway*

As discussed above, a portion of the park area extending into existing mapped street (Grand Central Parkway) would be demapped as street. This same portion would be mapped as park to facilitate its improvement as part of the public park space. It would remain owned by the City; the City would terminate the existing lease to Queens Ballpark Company, L.L.C. for this area.

b. A zoning map amendment to map a portion of the Project Area in a C8-4 district

The Applicants seek a zoning map amendment to map a C8-4 zoning district on a portion of the Development Site. The C8-4 district would be mapped on the property bounded by the centerline of Northern Boulevard to the north, a line 970 feet parallel with and southwesterly of 126th Street to the east, the centerline of Roosevelt Avenue to the south, and the centerline of the Grand Central Parkway to the west. This area encompasses Development A as well as the private ramps and driveways accessing Development A.

A C8-4 commercial district permits commercial uses with a maximum FAR of 5.0. No residential use is allowed. Certain community facility uses are not permitted; other community facility uses are permitted up to a maximum FAR of 6.5. In a C8-4 district, the height and setback of buildings is governed by a sky exposure plane.[5]

Development A would include a gaming facility among other uses. The QF Applicant is seeking a license to permit this gaming facility and, as part of the license application process, the New York State Gaming Facility Location Board will review the design and layout of the proposed gaming facility. The proposed zoning map amendment to create a C8-4 district would allow the Gaming Facility Text Amendment to apply to the Development Site. Pursuant to the Gaming Facility Text Amendment, if the Gaming Commission issues a license to operate a gaming facility within a mid- to high-density zoning district such as a C8-4 district, it shall be deemed to have satisfied all applicable regulations of the Zoning Resolution, notwithstanding any inconsistencies with the specific bulk and other zoning provisions that may apply in a given district.

If the QF Applicant is not awarded a gaming facility license, the alteration maps for the city map change described above will not be filed, the Development Site area would remain mapped parkland used as surface parking, and the zoning map amendment would not take effect.

8. Conclusion

The Development Site is a vast expanse of asphalt surface parking lots located at the juncture of existing and new neighborhoods and public parks. Replacing these parking lots with landscaped open space, dining, and entertainment uses would create jobs and benefit local residents, workers, sports fans, the broader Queens neighborhoods, and New York City as a whole. The proposed land use actions would allow for this redevelopment of the Development Site in the event the New York State Gaming Commission awards the QF Applicant a license following an affirmative vote of the CAC, pursuant to the state-led competitive application process.

[5] The maximum height of a front wall is 85 feet. At or below 85 feet, a building must incorporate a 20-foot setback on narrow streets and a 15-foot setback on wide streets. A building may not penetrate a sky exposure plane that starts at a height of 85 feet and inclines inward with a ratio of 2.7 feet of vertical distance to 1 foot of horizontal distance along narrow streets and a ratio of 5.6 feet of vertical distance to 1 foot of horizontal distance along wide streets. An alternate set of regulations provide for a steeper sky exposure plane where an open area is provided along the front lot line.