ITEM #: <u>45</u> DATE: 06/12/18

COUNCIL ACTION FORM

<u>SUBJECT:</u> AMES URBAN FRINGE PLAN AMENDMENT FOR TWO PROPERTIES IDENTIFED AS 3554 NORTH 500TH AVENUE.

BACKGROUND:

Hunziker Companies is the applicant representing property owners Clara Whatoff and Martha Nordyke for a minor amendment to the Ames Urban Fringe Plan Land Use Framework Map for two parcels of land within the boundaries of the Ames Urban Fringe. The two parcels are located on the east side of North 500th Avenue (County Line Road) at the intersection with Onion Creek, approximately 3/4 miles north of Ontario Street. (see Attachment A & Attachment H). The proposed change is to Ames Urban Fringe Plan to change the land use designation to Rural Residential for both parcels to accommodate the construction of three new homes along with retention of the existing farmstead site on the north parcel.

The Ames Urban Fringe Plan is a shared land use plan cooperatively developed by Story County the City of Ames and the City of Gilbert made possible through a 28E intergovernmental agreement that addresses land within two miles of the City. The 28E Agreement lays out processes for annexation, subdivision, plan review and amendments for lands within the Fringe Area, area within two miles of the City. The Urban Fringe Plan has two important layers of policies that are depicted on a Land Use Class map and a Land Use Framework map. The Land Use Class map designates property as one of three designations that then defines how subdivisions are reviewed and what type of land may be annexed into a City. The Land Use Framework Map identifies the types of acceptable uses in the Fringe area that match corresponding development policies of the Fringe Plan.

The current Ames Urban Fringe Plan land use designations of these properties are Agricultural and Farm Services (AFS) on the north parcel and Urban Residential (UR) on the south parcel. Natural Area also exists on both parcels adjacent to Onion Creek. The two land use framework classes are Urban Service Area for the south and Rural Service and Agricultural Conservation Area to the north of Onion Creek.

Agricultural and Farm Services (AFS) is intended to allow for agricultural uses and accessory uses with scattered sites for residential dwellings on existing large lots. Urban Residential is intended for eventual annexation to the City for development at urban densities with centralized urban infrastructure such as wastewater and water services. The proposed Rural Residential amendment allows for residential uses that are situated in a compatible setting with agricultural uses on large lots, with a maximum density of one dwelling per acre, but no minimum density is required. The Rural

Residential designation is also for area that is not intended to be annexed into the City. A more complete description on the land use designation with excerpts of the text are included in Attachments D,E,F, and G. The Land Use Class Framework Map is included as Attachment H. The full text of the Fringe Plan is available on the Ames Planning Division website at http://www.cityofames.org/planning.

Under the current land use designations, the north parcel is designated Agricultural and Farm Services (AFS) and Natural Area and is never intended to be annexed or developed at urban standards or serviced by urban infrastructure. This property currently already contains a home that was constructed as a farmstead to this property. The property is zoned A-1, the County's basic agricultural zoning district.

The south parcel contains some Urban Residential designation and Natural Area and is located at the far north and west end of the Urban Residential map designation for Ames along the Story and Boone County line and is located between Onion Creek on the north and an existing small rural subdivision on the parcel to the south. The Urban Residential designation requires annexation to the City prior to any subdivision or development. The parcel is zoned A-1 and could have one home constructed on the property under County standards and without City review of a subdivision. The Urban Residential designation for this site was a result of an evaluation of Northwest Growth Area that could be served by sanitary sewer line along Onion Creek. The developable area of the parcel is reduced by Natural Area from Onion Creek. There is currently no home on this parcel.

The proposed change is a unique request to consider removing a parcel of land from a designated area intended for Urban Services by the City and to also designate the parcels as Rural Residential to allow for two additional homes to be built compared to what is permissible under the current County zoning. The Fringe Plan has multiple goals of planning for urbanization, protecting farmland and natural resources, and allowing for some rural development. Two distinct policy issues apply to the request. These issues are related to Goal 2 of the Land Use Policy Plan of providing adequate land to meet population and employment targets of the City while also guiding the location and character of development to be compatible with natural resources and rural areas. The first question is whether removing the land from Urban Service area for future annexation is appropriate and the second question is whether it is then appropriate to designate the sites Rural Residential to allow for the creation of additional home sites.

Evaluation of the request has to be considered within the context of the current and proposed designations as there are no direct policies on changing from one designation to another. Staff has some concerns on the precedent of isolated land use designation changes to create new home sites and recommends providing additional context for the evaluation by addressing specific issues concerning proximity to the City, growth areas of the City, access and transportation capacity to a site, and farmland and natural area preservation.

Distance From Ames City Limits

The Rural Service and Agricultural Conservation Area policies explain that rural residential designations should be located a large distance from municipal services in RSACA Policies #4 & 5:

RSACA Policy 4: Permit agricultural/farmstead and strategically located rural residential development (areas at a large distance from municipal services) to use well water or other water systems in conformance with the standards of the lowa Department of Natural Resources and respective County Boards of Health.

RSACA Policy 5: Permit agricultural/farmstead and strategically located rural residential development (areas at a large distance from municipal services) to use on-site wastewater treatment systems where soils provide adequate drainage and filtration in conformance with the standards of the lowa Department of Natural Resources and respective County Boards of Health.

The parcels are located approximately 3/4 mile from the Ames City Limits in rural Story County. Staff views the distance the proposed Rural Residential designation to be located a large enough distance to meet RASCA policy standards 4 & 5. Plans to place urban sanitary sewer along Onion Creek have not yet been finalized as development of the Northwest Growth Area has not begun due to needed significant infrastructure extensions. The topography of the location also makes the extension of urban water and sewer difficult for economical service of low density development. The change of the Urban Residential map designation of the south parcel is not seen to impede future land availability for annexation into Ames as part of the Northwest Growth Area. The north parcel is further removed from the City and is far enough from municipal services to be of no concern about future City growth at this time.

Urban Residential Designation

The Urban Residential designation is located under the general Urban Service Area class in the Ames Urban Fringe Plan. The Urban Residential designation on the south parcel of the proposed map change was established as an area that the City of Ames has viewed as desirable to annex and develop at urban standards in the future as part of the larger Northwest Growth Area. The abutting properties to the south of this parcel are also in the Urban Residential land use designation and contain three rural homes built between 1999 and 2006. Annexation and development of the south parcel in this application can be seen to be unlikely due to its periphery location and the likely impediment of contiguous land for annexation due to the existing three home sites to the south.

Urban Service Area goal 4.2 requires that new urban development "has adequate public facilities". The presence of the existing rural residential homes to the south make it unlikely that the south parcel the applicant is requesting the land use map designation

change for will be annexed. The isolated nature and topography of the property in the application makes service from urban infrastructure such as water and wastewater difficult and expensive. A large amount of Urban Residential land designation exists between the properties containing the homes to the immediate south and the current Ames City limits which is majority unbuilt on and allows for a generous area for future annexation and urban development by the City of Ames. This parcel could have a single new home constructed on it without a land use designation map change.

Staff does not believe that choosing to remove the Urban Residential land use map designation from the south parcel for Rural Residential in this application interferes with the Ames Urban Service area long term growth goals of the Northwest Growth Area.

Transportation Access and Capacity

The properties in the application for the map change are located along and have direct access from North 500th Avenue which is a paved concrete road maintained by Story County. Rural Service and Agricultural Conservation Area policy goal #6 states:

RSACA Policy 6: Limit development in areas that would create a need for the upgrade of roads before they are scheduled in the appropriate jurisdiction's capital improvements program. Where proposed development will potentially increase the traffic volumes in excess of the current road capacity, provide for the cost of road improvements at the time of development.

Serial development of home sites along county roads could disrupt the operations of the road and cause maintenance concerns for gravel roads. 500th Avenue is a paved road. Given that no road upgrades or existing service issues have been identified by Story County the proposed addition of three homes is not seen to create a negative impact on the circulation system. The County would evaluate site access through their subdivision and zoning permit process if the amendment is approved. **Staff views these conditions as accommodating future rural development at this location and is not seen as problematic to existing infrastructure.** If the proposed Rural Residential designation was to be developed at greater densities, there could be conflicts with road capacity.

Farmland Conservation- Land Evaluation Site Assessment (LESA) Ratings

Story County uses a process for determining suitability of land for division with the Land Evaluation Site Assessment (LESA) process. This process gives a rating to properties in the county based on specified criteria for land quality and suitability for farming. The scale for the LESA process ranges from 0-266 as the acceptable range to allow for division of property to lot sizes less than the A-1 minimum lots size of 35 acres. If the score for the exceeds 266, it is deemed otherwise agriculturally productive land division of the property for home site would not be permitted. Story County has completed a LESA assessment for both parcels in this application and has determined a score of 237 on the south parcel and 262 on the north parcel. These scores fall within the acceptable range for division of land to less than 35 acre sites. **This can be seen to**

support rural residential development as not being detrimental to agricultural production. The City has no specific policy on LESA for evaluating rural subdivisions.

Natural Areas

The Natural Area map designation currently extends over areas that are currently row crop areas particularly on the north parcel and as a result the applicant is proposing to reduce the amount of Natural Area shown on the map to more accurately reflect the row crop and actual Natural Area. Natural Areas are designated as providing habitat for wildlife, minimizing storm water runoff, stabilizing soils, modifying climactic effects and providing for visual attractiveness as well as providing some recreational purposes. The Natural Area designation was intended to be general in nature at the time the Fringe Plan was adopted and to provide some area of buffer between the natural resource and other activities. Creation of new lots within the Natural Areas is prohibited. Adjusting the Natural Area designation to more accurately reflect row crop areas can be found to be consistent with the Land Use Framework Map. The remaining Natural Area map designation is still adequate to protect Onion Creek and meet the goals of the Urban Fringe Area.

Planning and Zoning Commission Recommendation The Planning and Zoning Commission considered the request at a Public Hearing on May 16, 2018. The Commission discussed the implications of the change and how many homes could be constructed under each option. The Commission voted 6-0 to recommend approval of the proposed map change.

The Story County Planning & Zoning Commission reviewed and recommended approval of this item at their June 6th meeting. The Story County Board of Supervisors are scheduled to consider the request at their June 12th meeting.

The Gilbert City Council reviewed and approved this request at its May 21st City Council meeting.

ALTERNATIVES:

- 1. The City Council can approve a Minor Amendment to the Ames Urban Fringe Plan Land Use Class Map from Urban Service to Rural Service and Agricultural Conservation Area on the Land Use Framework Map to Rural Residential for both properties as requested by the applicant.
- 2. The City Council can approve a modified Minor Amendment to the Ames Urban Fringe Plan Land Use Class Map and Land Use Framework Map for the south parcel only, to Rural Service and Agriculture and Farm Service, with no change to the north parcel.

- 3. The City Council can deny the Minor Amendment to the Ames Urban Fringe Plan Land Use Framework Map to Rural Residential for both the properties.
- 4. The City Council defer action and request further information or analysis from the staff or the applicant.

CITY MANAGER'S RECOMMENDED ACTION:

The issues of rural subdivision adjacent to Ames has been a subject a handful of recent inquiries to both City and County staff. While the Land Use Policy Plan and its extension as the Ames Urban Fringe Plan provides general guidance on how to consider changes, much of the language in the Urban Fringe Plan also encourages conformance to the plan as it existed when drafted in 2006 and approved with a 28E agreement in 2011. There is very little relevant precedent with the City to consider the type of proposed amendment to Rural Residential.

However, after review of the policies in the Ames Urban Fringe Plan staff does not find that the plan prohibits permitting a Land Use Framework Map change. The proposed change and subsequent future subdividing for residential use could be viewed as not taking significant areas of the Agriculture and Farm Service area out of agricultural production. The Agriculture and Farm Service designation is a subclass of the Rural Service and Agricultural Conservation Area which permits residential property in rural areas at rural densities.

Furthermore, reducing a small amount of Urban Residential area is not seen as significantly impacting the future growth and development of the City of Ames given the nature of the property in question and the challenges in serving the property with urban services. Adjusting the Natural Area designation on both parcels to more accurately reflect row crop areas is reasonable when an adequate buffer is accommodated. The proposed remaining Natural Area map designation can be seen to be adequate to protect Onion Creek and meet the goals of the Urban Fringe Area. None of the row crop areas on the properties are within FEMA designated Flood Zones.

Staff notes that it is very important to the context of the proposed change that it is understood that the current A-1 zoning is seen as an implementing zoning district of the proposed Rural Residential land use designation and the change is not meant to justify a rezoning to a more intense category.

Therefore, it is the recommendation of the City Manager that the City Council act in accordance with Alternative #1 which is to approve the request to amend the

Ames Urban Fringe Plan Land Use Class and Framework Map for both the north and south parcel to Rural Residential. Although staff has some reservations on precedent for other sites seeking additional rural home sites, this recommendation is based upon the unique circumstances of this site and the limited development potential of two additional homes between the two parcels. If there were to be additional development under the Rural Residential designation staff would be unlikely to support the change in the designation for this site.

In the event the City Council doesn't find the proposed amendment to conform to the policies of the LUPP and the Fringe Plan it can choose to approve an amendment for one property and not the other or to deny the minor amendment in its entirety.

<u>ADDENDUM</u>

Request and Referral. On January 23, 2018, the City Council voted to initiate a Minor Amendment to the Ames Urban Fringe Land Use Framework Map, as requested by Chuck Winkleblack of Hunziker and Associates, on property owned by Martha Nordyke and Clara Whatoff of approximately 75.04 acres, divided between two parcels, designated as "Agriculture and Farm Service" in the Rural Service and Agricultural Conservation Area on the north parcel and "Urban Residential" in the Urban Service Area on the south parcel and located north of the corporate limits on the east side of North 500th Avenue along the Boone and Story County line. described as 3554 North 500th Avenue (see Attachment A).

Each parcel is described as follows:

- North Parcel is located at 3554 North 500th Avenue, and includes approximately 41.70 gross acres. A single family dwelling is located on this parcel built in 1900. There is approximately 6 acres of FEMA designated Flood Zone on the southeast portion of the property east of the existing single family dwelling. The portion located in the flood zone is all located in the "Natural Area" on the Ames Urban Fringe Land Use Framework Map (see Attachment C).
- <u>South Parcel</u> is located at 3554 North 500th Avenue, and includes approximately 33.34 gross acres. There is approximately 9 acres of FEMA designated flood zone on the eastern portion of the property, The portion located in the flood zone is all within the "Natural Area" on the Ames Urban Fringe Land Use Framework Map (see Attachment C).

Ames Urban Fringe Plan. The Ames Urban Fringe Plan designates this site as "Agriculture and Farm Services" and "Urban Residential". To accommodate the request, an amendment must be made to designate this land as "Rural Residential." The existing and proposed land use designations are each a subclass of the "Rural Service and Agricultural Conservation Area." And "Urban Service Area". This designation allows for development of residential property in rural areas within the Urban Fringe Area at rural densities and in areas where urban infrastructure may not be in place for a time after the Fringe Plan. This type of development style includes large lots with a maximum average density of 1 unit per acre. In general he lot size for scattered sites should be larger than one acre.

Zoning. The subject site is currently zoned A-1 by Story County. Staff notes that it is very important to the context of the change that it is understood that the current A-1 zoning is seen as an implementing zoning district of the proposed Rural Residential land use designation and the change is not meant to justify a rezoning to a more intense category.

Applicant's Statement. The applicant's Narrative for the Amendment to the Ames Urban Fringe Land Use Framework Map is included in Attachment C.

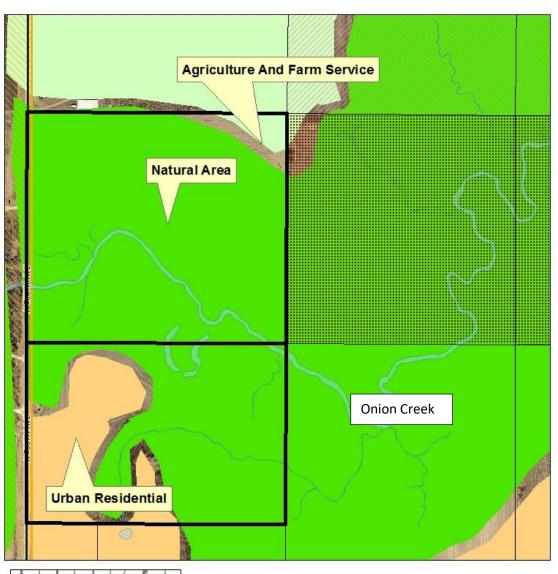
Amendment Considerations. The Land Use Policy Plan provides guidance on what considerations should be given for an amendment to the Land Use Policy Plan. When reviewing major and minor proposed amendments to the Land Use Policy Plan, consideration should be given to whether or not the proposed amendment is consistent with the Goals for the Urban Fringe. [Found in Attachment D.] These goals, and the related objectives below each goal, should apply to review of both minor and major amendments.

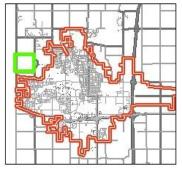
Traffic. The addition of two buildable lots, for a total of four lots in the subdivision, will result in a minimal increase in traffic volumes that exist on North 500th Avenue, providing access to the subdivision.

Public Utilities. The City of Ames does not extend public infrastructure beyond the corporate limits. No City public utilities will serve the parcels under consideration for a land use amendment, prior to annexation.

Natural Areas. The Rural Residential designation will not alter the intent of the Natural Area designation. The applicant has requested to alter the Natural Area to better reflect row crop production location. A change in the land use designation from "Agriculture and Farm Service" and "Urban Residential" to "Rural Residential" will maintain Natural Area along Onion Creek. Subdivisions within the Natural Area are prohibited.

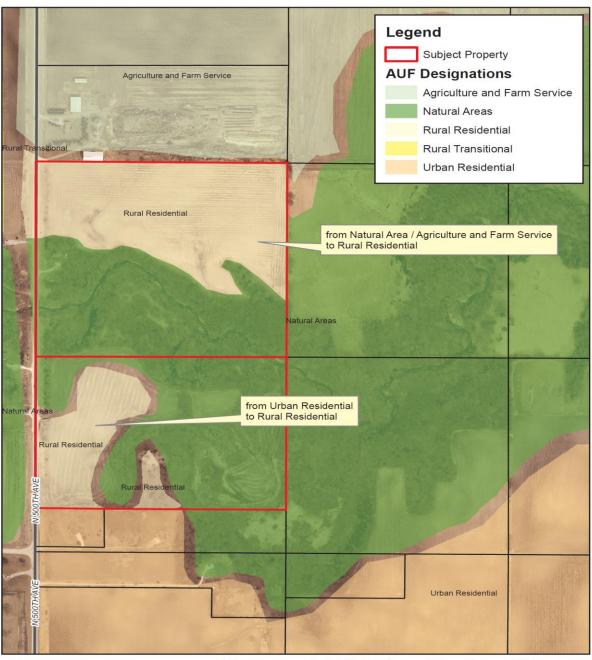
Attachment A- Location Current AUF Land Use Designation





© Current Land Use 3554 North 500th Ave

Attachment B-Proposed Land Use Designations





Proposed AUF Classification Change 3554 N 500th Ave

Attachment C- Applicants Narrative and Map

To: Justin Moore, Planner, city of Ames Planning and Housing Department

From: Chuck Winkleblack, Manager, Hunziker Companies

RE: Narrative for Whatoff property Urban Fringe plan amendment

Date: May 10, 2018

The Hunziker Companies represent a potential buyer for these two tracts of land totaling 75 acres on County line road located at 3554 N. 500th Ave. One house can be built on each parcel currently. The Buyer would like to change the configuration of the two existing parcels and be able to have four total building lots at the end of this process.

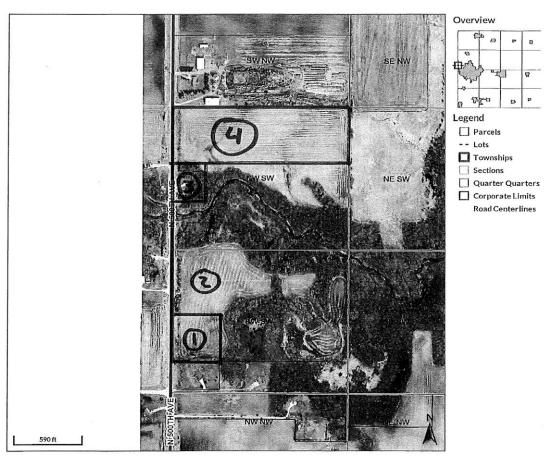
Attached is a map showing the approximate desired lot sizes and location. We believe that this configuration protects the natural areas and allows for two more houses to be built on the parcels then are currently allowed.

There is a current building site on lot 3. Lots 1 & 4 are all in areas that have been farmed in the past and not in any of the natural areas. Lot 2 will have a mix of natural area and farmed area.

It is our belief that this layout will be better for the environment by protecting the natural areas. It is likely that much of the area that has been farmed in the past will no longer be farmed when all four lots are developed thus providing better protection for the creek and reduce overall runoff into the watershed.

Attachment C (Cont.) Applicants Proposed Property Layout

Beacon[™] Story County, IA / City of Ames



Concerning Assessment Parcels and Platted Lots Within the City of Ames Jurisdiction;

The solid parcel boundary lines represent the legal description as recorded and are not necessarily the official platted lot lines. Dashed lines are official platted lots. If a parcel contains dashed lines, please contact the Ames Planning & Housing Department (515-239-5400) to determine which lines can be recognized for building permit or zoning purposes. If you have questions regarding the legal description or parcel measurements, please contact the Story County Auditor's office (515-382-7210).

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Developed by Schneider The Schneider Corporation

the questions regarding the legal description or parcel measurements, please contained to
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Attachment D: Common Goals for the Urban Fringe (Excerpt from the Ames Urban Fringe Plan)

Common Goals for the Urban Fringe

The six principles discussed in the first section of this report guide the cooperation to plan and manage land uses in the Ames Urban Fringe, including intergovernmental coordination, prime agricultural land preservation, targeted growth, growth management, transitional land uses, and environmental protection. These principles are embodied in the following goals for the Urban Fringe.

Common Goal 1.1

To provide a balanced mix of land uses that is arranged to avoid conflicts and to maximize efficient delivery of municipal and county services and facilities.

Common Goal 1.2

To prevent premature development and preserve the most high value farmland in appropriate locations.

Common Goal 1.3

To provide a variety of housing opportunities in the Ames Urban Fringe in appropriate locations.

Common Goal 1.4

To provide adequate opportunities for commercial and industrial development in appropriate locations.

Common Goal 1.5

To coordinate development decisions with the efficient provision of public facilities and services.

Common Goal 1.6

To protect and preserve sensitive natural resources, including floodplains, woodland areas, wetlands, and other sensitive natural areas.

Common Goal 1.7

To secure a system of public and private open spaces throughout the Ames Urban Fringe that serves as a visual and recreational amenity.

Attachment E- Rural Residential AUF Policies

(Excerpt from the Ames Urban Fringe Plan)

- RR Policy 1: This land use designation includes all single-family residential land uses/developments that involve maximum average net densities of one unit per acre.
- RR Policy 2: Full urban infrastructure standards are not required. (Relates to RSACA Goal 2.6)
- RR Policy 3: Decentralized wastewater treatment facilities and wells shall meet IDNR, county, and city standards. (Relates to RSACA Goal 2.6)
- RR Policy 4: Encourage clustering of residential sites within these land areas to limit the short-term and long-term costs associated with infrastructure improvements and the distribution of public services. (Relates to RSACA Goal 2.6)
- RR Policy 5: Make provisions to protect environmental resources, environmentally sensitive areas and adjacent Natural Areas. (Relates to RSACA Goal 2.3, 2.4)
- RR Policy 6: Mitigate and manage stormwater run-off, soil erosion, and wastewater discharge from Rural Residential land uses according to IDNR and county standards. (Relates to RSACA Goal 2.3)
- RR Policy 7: Protect the rural character of the Rural Service and Agricultural Conservation Area through residential density requirements, buffering requirements between conflicting land uses and other appropriate transitions from urban to rural areas. (Relates to RSACA Goal 2.1)
- RR Policy 8: Limit rural residential development on prime agricultural land. Assure that the development on prime agricultural land is farm-related and has adequate access to road systems and potable water. Development should not interfere with agricultural-related activities. . (Relates to RSACA Goal 2.1, 2.2, 2.5, 2.6).
- RR Policy 9 Minimize the impact of non-agriculture development in rural areas on existing agricultural operations. (Relates to RSACA Goal 2.1, 2.5)

Attachment F- Rural Service And Agricultural Conservation Area Policies

RSACA Policy 1: Maintain farming and agricultural production as the predominant characteristic of the Rural Service and Agricultural Conservation (RSACA) Area.

RSACA Policy 2: Prohibit urban-scale growth and development in the Rural Service and Agricultural Conservation Area. (Relates to RSAC Goal 2.1)

RSACA Policy 3: Within the Rural Service and Agricultural Conservation Area, minimize conflicts between agricultural and non-agricultural land uses by educating residents and potential residents on the realities of rural living and by requiring adequate buffers between land uses. (Relates to RSAC Goal 2.1)

RSACA Policy 4: Permit agricultural/farmstead and strategically located rural residential development (areas at a large distance from municipal services) to use well water or other water systems in conformance with the standards of the lowa Department of Natural Resources and respective County Boards of Health. (Relates to RSAC Goal 2.6)

RSACA Policy 5: Permit agricultural/farmstead and strategically located rural residential development (areas at a large distance from municipal services) to use on-site wastewater treatment systems where soils provide adequate drainage and filtration in conformance with the standards of the lowa Department of Natural Resources and respective County Boards of Health. (Relates to RSAC Goal 2.6)

RSACA Policy 6: Limit development in areas that would create a need for the upgrade of roads before they are scheduled in the appropriate jurisdiction's capital improvements program. Where proposed development will potentially increase the traffic volumes in excess of the current road capacity, provide for the cost of road improvements at the time of development. (Relates to RSAC Goal 2.2)

Attachment G- Urban Service Area Policies (Excerpt from the Ames Urban Fringe Plan)

USA Policy 1: Require land uses and the intensity of development within identified growth areas to be consistent with the Ames Urban Fringe Plan. (Relates to USA Goal 4.1)

USA Policy 2: Require all urban development to provide improvements consistent with the improvement standards, building codes, and service requirements adopted by the City of Ames to ensure adequate public facilities and building safety. (Relates to USA Goal 4.2)

USA Policy 3: Ensure that annexation is coordinated with the timely and efficient provision of adequate public facilities and services. (Relates to USA Goal 4.1, 4.4)

USA Policy 4: Require developments to provide adequate street, right-of-way, and drainage, bicycle, pedestrian and connected open space improvements. Such improvements should allow for adequate emergency access and ability to connect to municipal street networks in the future. (Relates to USA Goal 4.1)

USA Policy 5: At the time of development provide secure funding sources for the cost of new improvements and services required by new development. (Relates to USA Goal 4.3)

USA Policy 6: Ensure that development for which services may change from rural systems to urban infrastructure when available has guaranteed the costs for installation and connection to future urban infrastructure in an acceptable manner before recording final plats for development. (Relates to USA Goal 4.3)

USA Policy 7: Coordinate street and drainage improvement projects with other service providers to meet the demands from planned development more efficiently. Prior to constructing improvements, ensure that needed utility improvements are coordinated so new pavement will not need to be disturbed for planned upgrades. (Relates to USA Goal 4.4)

USA Policy 8: Promote coordination and cooperation among all fire prevention, emergency medical services, and law enforcement agencies. (Relates to USA Goal 4.4)

USA Policy 9: Support the provision for responsive, high-quality fire suppression and emergency medical services. Require that development have adequate access to emergency services. Coordinate the design, location, and construction of standpipes and fire hydrants with fire districts and the City of Ames Fire Department as needed to protect new development. (Relates to USA Goal 4.4)

USA Policy 10: Establish a process to enable the City of Ames to negotiate with the owners of property planned for park and recreation purposes prior to the approval of rezoning or subdivision applications. (Relates to USA Goal 4.4)

Attachment G- Map

