

CITY OF MILWAUKIE

Application for the Adoption of the Balfour Park Master Plan as an Ancillary Document to the City of Milwaukie Comprehensive Plan

Date: May 12, 2015

Applicant: North Clackamas Parks and Recreation District
150 Beaver Creek Road
Oregon City, Oregon 97045

Contact: Katie Dunham
503-742-4358
kdunham@clackamas.us

Property Owner: City of Milwaukie

Property Address: Balfour Park
3103 SE Balfour Street
Milwaukie, Oregon 97222

MAP & Tax lot #s: Township 1 South, Range 1 East, Section 25CA, Tax Lot 6900 & 7000; Latitude 45° 27' 6.7764" N, Longitude 122° 37' 52.3091" W

Comprehensive Plan Designation: Low Density (LD)

Zoning Designation: R-7

Property Size: 0.80 acres

Request: Adoption of the Balfour Park Master Plan as an ancillary document to the City of Milwaukie Comprehensive Plan

INTRODUCTION

Action Requested

Adoption of the Balfour Park Master Plan as an ancillary document to the City of Milwaukie Comprehensive Plan.

Background and Site Description

Balfour Park is a .80 acre undeveloped neighborhood park site located in the Ardenwald/Johnson Creek neighborhood at 3103 S.E. Balfour St. in Milwaukie. The City of Milwaukie purchased the land in 2008 with funds from Metro's voter-approved 2006 natural areas bond measure. The property is owned by the City of Milwaukie and managed by the North Clackamas Parks and Recreation District (NCPRD) in accordance with an intergovernmental agreement. The site's existing steep topography and mature canopy of trees provide a unique opportunity for recreation on a site very special to the neighborhood.

Public Involvement and Planning Process

The site is an opportunity to create a neighborhood park for the residents of the area. Through a public process, NCPRD built consensus among interested parties around a common vision for the park. NCPRD and the City hosted two meetings during the fall of 2014 to discuss the park site and develop a park master plan. The public meetings were devoted exclusively to this subject and were held on September 24 and November 3, 2014. At the first public meeting site analysis and existing conditions materials were presented along with three initial master plan concepts. Meeting attendees were asked to actively participate in the group discussion and a breakout session with consultants and staff. After the first public meeting and throughout the project NCPRD and the City placed information on their websites for review and comment. Comments and suggestions were compiled, discussed, and incorporated into the design process. A final draft master plan was presented at the second public meeting. Interested citizens had the opportunity to provide additional input and the general consensus was positive. The project was also discussed numerous times with the Milwaukie Park and Recreation Board and the North Clackamas Park District Advisory Board. The public process is further described in the response to Chapter 4, Recreational Needs Element, Objective 3, within this document.

Proposal

The key goal of the master planning process for the Balfour Park was to develop a plan that protects the existing character of the site while accommodating the neighborhood needs for an interesting and engaging place for flexible active and passive recreation, provides for ease of maintenance and longevity, while providing a safe and enjoyable experience for the community. Based on field observations, site analysis, background data collection, and input from NCPRD, the City of Milwaukie, community groups and public at-large, the master plan was developed and refined to achieve this goal. There was clear support for keeping the existing character of the park intact. Elements of the plan are listed below. Additional details about proposed improvements are included in the attached master plan document submitted as part of this application.

Balfour Park Master Plan Elements:

- A nature play area
- A seating area with bench and picnic table
- A small ornamental planning area with educational signage or edible native plants
- A flexible open lawn area
- A community garden area

- A looped concrete pathway
- A small picnic area
- A stormwater swale with native planting
- Low retaining wall/seat walls
- New evergreen and deciduous trees
- Low maintenance, native landscape plants
- Half-street improvements
- Bike parking
- Drinking fountain
- Perimeter fencing

Plan Adoption Process

Since the City does not have a “Parks” or “Open Space” zone, except within downtown, the City employs the following two-step process to designate and develop publicly-owned parks.

Step 1—Master Plan Adoption. Master plan adoption, a legislative action requiring approval from City Council, is the process by which the City formally identifies a long range plan for a park. A master plan provides the conceptual framework for future development and investment and is the first step toward implementing the community’s vision for specific park improvements. Park development, which occurs in the second step, generally does not occur until the City has adopted a master plan.

Step 2—Master Plan Implementation. Master plan implementation generally occurs after master plan adoption and requires minor quasi-judicial review by the Planning Commission. Development plans submitted during this step must conform to the adopted master plan.

The requested action only relates to Step 1 of this two-step process, namely the adoption of the *Balfour Park Master Plan*. This master plan adoption process is to affirm the public’s future use of the site as a park and to guide future park funding, development, and investment.

In order to adopt the proposed master plan, the plan must conform to the City’s existing adopted policies and meet all relevant approval criteria contained in the Milwaukie Comprehensive Plan (MCP) and the Milwaukie Municipal Code (MMC).

The applicable MCP and MMC criteria are contained in the following sections and addressed below:

- MMC 19.902.3, including MCP Chapter 2 and Chapter 4
- MMC 19.902.4

Additionally, NCPRD must address the relevant aspects of the Metro Urban Growth Management Functional Plan and the relevant Statewide Planning Goals

CITY OF MILWAUKIE COMPREHENSIVE PLAN GOALS AND POLICIES

NCPRD is seeking adoption of the Balfour Park Master Plan as an ancillary document to the City of Milwaukie Comprehensive Plan (MCP). Per city staff, the applicable code criteria NCPRD must address for the text amendment and map amendment are MMC Chapter 19.902.3.B, and MMC 19.902.4. These are addressed below.

MMC 19.902.3 COMPREHENSIVE PLAN TEXT AMENDMENTS

Section 19.902.3 Comprehensive Plan Text Amendments

Changes to the text of the Milwaukie Comprehensive Plan shall be called Comprehensive Plan text amendments.

A. Review Process

Changes to the text of the Milwaukie Comprehensive Plan described in Subsection 19.902.2.A shall be evaluated through a Type V review per Section 19.1008

B. Changes to the Milwaukie Comprehensive Plan may be approved if the following criteria are met:

- 1. The proposed amendment is consistent with the goals and policies of the Comprehensive Plan, as proposed to be amended.**

The applicable components relevant to address are:

Chapter 2, PLAN REVIEW AND AMENDMENT PROCESS

Milwaukie Comprehensive plan (MCP) Chapter 2 – Plan Review and Amendment Process. GOAL STATEMENT: Establish a Plan review and amendment process as a basis for land use decisions, provide for participation by citizens and affected governmental units, and ensure a factual base for decisions and actions. Objective 1, Policies 3-7 are applicable:

- Objective 1 Policy 3 – Individuals, the Planning Commission, or the City Council may request plan amendments at any time separate from the normal Comprehensive Plan Amendment application process...**

Response: The City of Milwaukie and North Clackamas Parks and Recreation District are requesting this plan amendment under an intergovernmental agreement. The City and District have requested that the Planning Commission and City Council review this application and hold a public meeting to discuss the application as part of the review process.

- Objective 1 Policy 4 – Submit copies of proposed Plan change to affected government units at the draft amendment stage and following final adoption of changes.**

Response: This step will be completed by the City as part of the review process.

- Objective 1 Policy 5 – All proposed Comprehensive Plan text and map amendments will be considered at advertised public hearings before the Planning Commission and City Council**

Response: This step will be completed by the City as part of the review process.

- Objective 1 Policy 6 – All proposed Comprehensive Plan text and map amendments will be processed per the procedures in the Zoning Ordinance.**

Response: This step will be completed by the City as part of the review process

- **Objective 1.7 – All Comprehensive Plan text and map amendments will be evaluated based on the approval criteria in the Zoning Ordinance for approval of Comprehensive Plan amendments:**

Response: This step will be completed by the City as part of the review process. The current designation on Comprehensive Plan Map 7 (Land Use) for Balfour Park is Low Density (LD) and needs to be changed to Public (P) to further designate this property as a future park and prepare the property for future Community Service Use (CSU) approvals that will be needed for future development. NCPRD and the City are applying for both the comprehensive plan text and map approvals at this time. The Balfour Park property is suitable for a neighborhood park and to be designated as Public. The property is in an area planned for a neighborhood park within the NCPRD Master Plan and is developable as a neighborhood park.

Chapter 4, RECREATIONAL NEEDS ELEMENT, Objective 1, 3, and 5:

Milwaukie Comprehensive plan (MCP) Chapter 4 – Recreational Needs Element.

GOAL STATEMENT: To provide for the recreational needs of present and future City residents by maximizing use of existing public facilities, encouraging the development of private recreational facilities, and preserving the opportunity for future public recreational use of vacant private lands.

- **Objective 1 PARK CLASSIFICATIONS**

Response: Balfour Park is identified in the proposed Master Plan as a neighborhood park – A *“Neighborhood Park typically serves one neighborhood (within ½ mile radius), is often located by a school, and provides short duration activities (field sports, play, leisure time, etc.). Minimum size is (typically) one acre. The standard is 1 acre of neighborhood park per 1,000 residents”*. The plan is specifically consistent with this objective because Balfour Park is an existing public property, currently owned by the City of Milwaukie, is .80 acres, and the Master Plan provides for park elements that typically serve one neighborhood. Ardenwald and Water Tower Park are the two other neighborhood parks located within ½-mile of the proposed Balfour Park in the Ardenwald-Johnson Creek neighborhood. The neighbors, District, and City purposefully proposed park elements that are different from the two other developed parks within the neighborhood while planning for Balfour Park. The proposed elements of the park include a Nature Play area, small seating and picnic areas, landscaping, a flexible open lawn area for informal play and gatherings, a community garden with a perimeter fence and gate, and a looped concrete pathway. These are all elements that facilitate activities that will provide places for the neighborhood to gather, play, and relax.

- **Objective 3 INTERGOVERNMENTAL COOPERATION**

Response: The Balfour Park Master Plan meets the goal of Objective 3 through the partnership between NCPRD and the City of Milwaukie strengthened by the Intergovernmental Agreement with the City. The property was originally acquired in 2008 by the City of Milwaukie in partnership with Metro and funded by the Metro 2006 voter-approved bond measure. NCPRD is currently maintaining and managing the future park site through the intergovernmental agreement. This master plan was completed through funding provided by NCPRD and in partnership with the City of Milwaukie. Citizen involvement was instrumental in developing the Balfour Park Master Plan (the Plan). NCPRD and City staff worked with park neighbors and the neighborhood association and park users played a major role in developing the Plan. NCPRD organized two public meetings to obtain input and ideas for park improvements. The public meetings were devoted exclusively to this subject and were held on September 24 and November 3, 2014. Following each public meeting plans were posted to an online project website and advertised by both the City and NCPRD. The project was also discussed and shared with the Milwaukie Park and

Recreation Board and the NCPRD District Advisory Board. The District Advisory Board reviewed the Balfour Park Master Plan on January 15, 2015 and endorsed moving forward with this application. In addition to public meetings, neighbors, and park users were encouraged to voice their comments and concerns throughout the design process. Many comments were received via phone conversation, e-mail, and comment cards and incorporated into the plan whenever possible. The key goal of the planning process was to develop a plan that minimizes environmental and property impacts, provides for ease of maintenance and longevity, while providing a safe and enjoyable experience for the community. NCPRD and the City are committed to working together toward future implementation of the plan and partnership in managing the park.

- **Objective 5 NEIGHBORHOOD AND COMMUNITY PARKS**

Response: The City and NCPRD share the goal of developing a City-wide park and recreation system which meets the needs of neighborhoods, the City, and the District as a whole. As stated in Policy #1, Balfour Park is in a location that is convenient for residents of the neighborhood, and has access to Balfour Road, a public street.

As stated in Policy #2, the proposed Balfour Park Master Plan park elements are intended to serve the needs of residents of that neighborhood only and will not contain large, highly structured facilities which may attract users from outside the neighborhood. Additionally, it is the intention of neighbors and community members that attended the public meetings and submitted comments during the public process that the park not include a basketball court or park picnic shelter, which are located at other nearby neighborhood parks (Ardenwald Park and Water Tower Park), and which neighbors believed would draw people from areas other than the directly surrounding neighborhood.

The proposed plan is also consistent with Policy #4, as the Balfour Park Master Plan does not propose any major structured recreational facilities (including lighted baseball and soccer fields, pools, tennis courts, etc.), which would be more appropriate for a community park or special use facility.

The change is in conformance with applicable Statewide planning goals:

Response: The plan is consistent with the following applicable statewide planning goals:

Goal 1: Citizen Involvement. Citizen involvement was instrumental in developing the Balfour Park Master Plan (the Plan). Please see the response to Chapter 4, Recreational Needs Element, Objective 3, Intergovernmental Cooperation, above. NCPRD strives to develop plans that minimize environmental and property impacts and provide for ease of maintenance and longevity while providing a safe and enjoyable experience for the community.

Goal 2: Land Use Planning. See response to MCP Chapter 4 – Land Use, above.

Goal 5: Open Space, Scenic, and Historic Spaces, and Natural Resources. The proposed Balfour Park Master Plan will serve to conserve Balfour Park as open space and preserve and enhance it as a park. There are no identified riparian values on the site. The proposed plan strives to protect this site's wildlife habitat values through preserving significant habitat trees along the north edge of the park and along the park boundaries. Additionally, the plan includes planting additional native plants within the park.

Goal 8: Recreational Needs. See response to Chapter 4, Recreational Needs Element, Objective 1, 3, and 5 above.

The proposed enhancements outlined in the Plan will comply with all applicable regional, state and federal regulations prior to and during any construction activity. There are no floodplains, creeks, wetlands, or designated Habitat Conservation Areas identified within the park site. Any work performed will comply with all applicable City regulations in effect at the time of land use application.

The proposed amendment is consistent with the Metro Urban Growth Management Functional Plan and relevant regional policies:

Response: The Plan conforms to the Metro Growth Management Functional Plan, specifically, Title 12, Protection of Residential Neighborhoods, Access to Parks and Schools. The proposed Balfour Park will meet a level of service standard of ½-mile access for neighborhood residents. The park is accessible by walking, biking and transit. TriMet bus 75 stops .10 miles away from the proposed park, at SE 32nd Avenue & SE Harvey Street.

Title 3 (Water Quality and Flood Management) and Title 13 (Habitat Conservation Areas) don't apply to the Balfour Park site.

MMC 19.902.4 COMPREHENSIVE PLAN MAP AMENDMENTS

Changes to the maps of the Milwaukie Comprehensive Plan shall be called Comprehensive Plan map amendments.

A. Review Process

Changes to the maps of the Milwaukie Comprehensive Plan described in Subsection 19.902.2.C shall be evaluated through either a Type IV review per Section 19.1007, or Type V Review, per Section 19.1008...Generally, Comprehensive Plan map amendments that involved 5 or more properties or encompass more than 2 acres of land are legislative and nature and subject to Type V review. Comprehensive Plan map amendments that involve fewer properties and encompass a smaller area of land are quasi-judicial in nature and subject to Type IV review.

Response: The proposed changes to the Milwaukie Comprehensive Plan, Comprehensive Plan Map 7, to reclassify Balfour Park from Low Density (LD) to Public (P) falls under a Type IV review because the amendment only involves one property containing two tax lots and is only 0.80 acres of land.

B. Changes to the maps of the Milwaukie Comprehensive Plan shall be evaluated against the approval criteria in Subsection 19.902.3.B...

Response: The plan conforms to the approval criteria in Subsection 19.902.3B, as outlined in the application responses above.



CITY OF MILWAUKIE & NORTH CLACKAMAS PARKS AND RECREATION DISTRICT

BALFOUR PARK MASTER PLAN

FINAL REPORT 04.20.2015

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ACKNOWLEDGEMENTS

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SPECIAL THANKS TO:

Residents of NCPRD and the City of Milwaukie who
contributed to this master planning process.

For more information, contact:
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INTRODUCTION

INTRODUCTION

This master plan was developed in partnership between the City of Milwaukie and North Clackamas Parks and Recreation District (NCPRD). Balfour Park is a 0.8-acre, undeveloped neighborhood park site located in the Ardenwald - Johnson Creek neighborhood at 3103 S.E. Balfour St. in Milwaukie, Oregon. The City of Milwaukie purchased the land in 2008 with funds from Metro's voter-approved 2006 natural areas bond measure. The site's existing steep topography and mature canopy trees provide a unique opportunity for recreation on a site very special to the neighborhood.

MISSION STATEMENT

Protect the existing character of the site while accommodating the neighborhood needs for an interesting and engaging place for flexible active and passive recreation. Through design, promote a sense of ownership by neighbors.

SCOPE OF PROJECT

The Balfour Park property offers the potential for a much needed place for neighbors to come together and enjoy both active and passive recreation. The master plan for the park addresses the functional needs of the park site such as circulation and Right-of-Way improvements, and provides a framework for reshaping the site so that it can meet the neighborhood's recreation needs. An open and interactive approach to the master planning process engaged City and District staff as well as neighbors and community members to create a lasting plan to guide future implementation of the park.

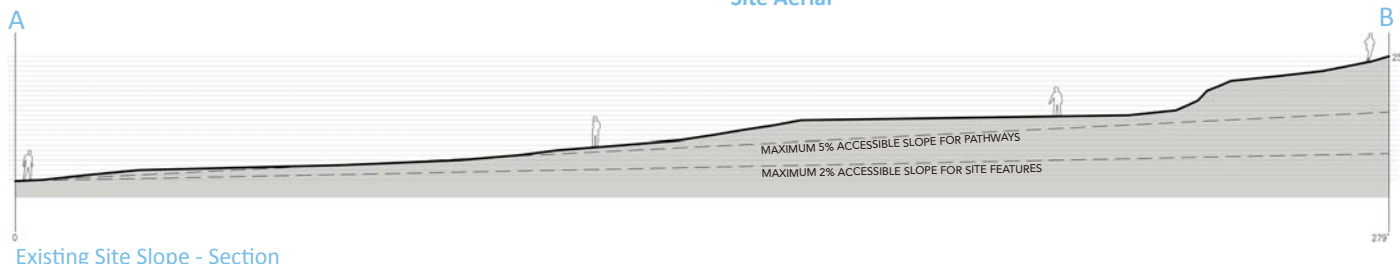
The Master Plan for the park includes active recreational use areas, passive use areas, storm water treatment, signage, landscaping, accessible pathways and site features including benches and picnic tables, an accessible play area, a possible community garden space, fencing and maintenance vehicle access.



Context Aerial



Site Aerial



Existing Site Slope - Section

SITE DESCRIPTION

PARK CLASSIFICATION

NCPRD defines a neighborhood park with the following:

- Serves as the recreational and social space of the neighborhood
- May provide opportunities for natural areas, informal activities, and passive recreation
- Typically includes playgrounds, picnic areas, natural areas, trails, open grass areas for passive use, outdoor basketball courts, and/or multi-use sports fields
- On-site parking and restrooms are not typically provided
- Typically serve an area of an approximately 1/2 to 1-mile radius
- Typically vary in size from 1/2 to 5 acres
- Examples of neighborhood parks are Water Tower Park and Ardenwald Park

NCPRD and the City of Milwaukie strive to use native plants whenever possible and provide long-lasting and easy to maintain site furnishings within parks.

MASTER PLANNING : SITE ASSESSMENT

The first step in the Master Planning process was to gather information related to the existing conditions of the site and City Code requirements. Using GIS information, a site analysis aerial was compiled for use throughout the master planning process. Site visits were conducted to gather information about existing site features including fencing and tree species. Interviews with City and District staff to understand site specific issues were performed. KPFF Civil Engineers provided resources related to storm water treatment requirements.

Information gathered during the initial phase was compiled into a single site analysis drawing along with existing site photos to illustrate the existing conditions and opportunities and constraints. The site analysis drawing and site photos were shared with City and District Staff for comments prior to the initial public meeting.

MASTER PLANNING : SITE ANALYSIS

The existing site is bordered by single family residences on the north, east and west sides. The south edge of the site is adjacent to the SE Bowman Street Right-of-Way. Existing fences line the majority of the park property. The northwest corner of the site is not fenced. Several large significant trees exist on the site included in a tree inventory completed as part of this project, as well as many smaller shrubs and fruit trees. The site slopes about 24' from the northeast corner down to the southwest corner. Because of the steepness of the site, several trees located in the middle of the site may need to be removed to accommodate site grading that is necessary to make the site usable and accessible. NCPRD will prioritize protection of the most significant trees. An official site survey documenting the location and species of all trees will be conducted once the District has funding for construction and moves toward development. Additionally it is recommended that an arborist be consulted to verify the health of existing trees and future maintenance requirements.

HISTORY : EARLY NEIGHBORHOOD INVOLVEMENT

As part of the site analysis, we reviewed the previous master plan concept that was developed by the Neighborhood Association in 2011. The Ardenwald - Johnson Creek Neighborhood Association is very interested in and committed to the future development of this park site. To promote awareness of the park property, over the past several years, they have been holding native plant sales and other events to raise money to support the future development of the park. The neighborhood association used funds they had raised to commission a design for the park from Mayer/Reed Landscape Architects. This preliminary design was a compilation of site elements neighbors were interested in seeing within the park. It was meant to show a range of possibilities for site elements and express the feel of the park the neighbors were interested in. To attain neighbor interest, the Neighborhood Association held a survey and questioned neighbors at a movie night at nearby Ardenwald Park and at the Milwaukie Farmers Market. This early concept plan was not a part of the City or District's official public process.

As part of this master planning process, the neighborhood's early concept plan developed by

BALFOUR PARK MASTER PLAN

EXISTING CONDITIONS & OPPORTUNITIES AND CONSTRAINTS



SITE DESCRIPTION, CONT.

Mayer/Reed was adjusted to fit the actual site dimensions, and amended to show the existing site contours received from GIS data. The early design concept was then redrawn with the new site context data to show how the site dimensions and contours affected the initial proposed concept.

To ensure the park design relates to the existing site conditions and appeals to a wide variety of users, three initial design options were developed to include a wide array of site elements that might typically be found within a neighborhood park in Milwaukee.



LEGEND

1 - Community Garden	4 - Picnic Area	7 - Bike Rack	10 - Bridge
2 - Dog Run	5 - Drinking Fountain	8 - Gravel Walking Path	11 - Screening Vegetation
3 - Play Area	6 - Water Play	9 - Dry Stream	12 - Shrub Planting

Early Concept Plan - Commissioned in 2011 by Neighborhood Association

MAINTENANCE CONSIDERATIONS

Throughout the design process, NCPRD maintenance staff were consulted so that the park would be designed to facilitate maintenance requirements. In addition to a pathway for maintenance vehicle access, the location of site furnishings and types of plant material were coordinated with maintenance staff.

PUBLIC PROCESS

PUBLIC PROCESS

As part of this master planning process, two public meetings were held to discuss design options and gather neighbor feedback. At the first public meeting, the site analysis and existing conditions materials were presented along with three initial master plan concepts. Meeting attendees were asked to actively participate in the group discussion and a breakout session with consultants and staff. After the first public meeting, comments were compiled and discussed with the City and NCPRD and incorporated in the design process. A final draft master plan concept was presented at the second public meeting.

NEIGHBORHOOD FEEDBACK

In general, the neighbors like the natural feel of the existing park site and want to protect as many of the existing mature trees as possible. Native planting is important to them, and there is a desire for edible plants if possible. The neighbors also expressed an interest in community gardens, an open flexible lawn, contemplative areas, areas for all ages of children to play, a unique nature play area with places for climbing, and places for sitting such as picnic tables and benches. There was also an interest in a drinking fountain located near the sidewalk. There was consensus for keeping a smaller looped pathway similar to the pathway in Option 1, located farther to the south. The neighbors also had a preference for locating the play area on the north side of the site in order to incorporate the slope with the open lawn in the center.

There was also a general consensus that structured active recreation such as a half basketball court was not desired.

MASTER PLAN CONCEPT

MASTER PLANNING : CONCEPT DEVELOPMENT

The City will require half-street development standards as part of the future site development. NCPRD and the City have a number of park and site development standards that must be included in all concept plan development; therefore, all three of the initial concept plans included the following: a curb cut to allow maintenance vehicles to access the site, a removable bollard to prevent unauthorized vehicles from entering the site, three bike racks, an entry sign, and low perimeter screening shrub planting to delineate and soften the park boundary while maintaining views into the park from the street frontage.

Design of the park master plan incorporates principles from Crime Prevention Through Environmental Design (CPTED) which includes keeping planting low to allow views into and through the park, keeping evergreen trees limbed up to prevent hiding spots, and maintaining clear entrances.

DEVELOPMENT PROPOSAL / ELEMENTS

The final master plan site improvements include:

- A nature play area with built-in slide and rock climbing slope
- A seating area with bench and picnic table near the play area
- A small ornamental planting area next to the play area with potential for educational signage and/or edible native plants
- A flexible open lawn area for informal play and gatherings
- A small flexible community garden area with a perimeter fence and gate
- A looped concrete pathway, wide enough to accommodate maintenance access to the play area
- A small paved area with a picnic table adjacent to the lawn
- A stormwater swale with native planting
- Low retaining/seat walls to hold the grade and provide seating opportunities
- New evergreen and deciduous trees
- Low-maintenance, native landscape plants
- Half-Street improvements
- Bike parking
- Drinking fountain
- Perimeter fencing

The design for the community garden, planting, and play area are general in nature and intended to be refined further with specific elements and locations once the District has funding for the park and moves toward development. Development of the community garden area will be based on neighborhood demand and the commitment by a group to assume management and maintenance responsibilities.

SUMMARY

NCPRD will make improvements to the park when funding for the whole park is available. This plan will make it possible for NCPRD to apply for grants and solicit partnerships to help complete improvements. Initial cost estimates were developed and provided to NCPRD to provide an initial estimate for future budgeting and planning purposes. The cost estimates and project elements are subject to change due to further refinements that may occur as the final park design is completed.

This plan is conceptual in nature. Final decisions regarding dimensions, materials and precise locations of improvements will be determined per all applicable regulatory requirements and as funding is available.

NCPRD will coordinate improvements with the City of Milwaukie and will follow necessary land use processes to ensure elements are consistent with all City policies and codes.

BALFOUR PARK MASTER PLAN

REFINED CONCEPT

APRIL 20, 2015

