

# MEMORANDUM #1: PLANS, POLICIES, AND CODES—FINAL

Date: April 27, 2021

To: Carolyn Johnson/Coos Bay Community Development Administrator  
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From: Gigi Cooper, AICP, David Evans and Associates, Inc.

Subject: City of Coos Bay Front Street Blueprint —Plan, Policies, and Code criteria for Blueprint development.

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The Project will address objectives for development of a cohesive, multi-modal loop through the Study Area that will enhance the economic development potential and safety of the corridor.

The Project objectives are to:

- Address the public's interest in parking, wayfinding and waterfront improvements.
- include strategies to implement access, circulation and connectivity improvements within the Study Area.
- Create a safe, balanced and efficient multimodal transportation system that offers transportation choices.
- Reflect the historic and cultural significance of the Study Area through public art and streetscape improvements.

## Study Area

The Study Area ( Front Street Project Area) is an industrial and commercial area within the City, bound on the west by US Highway 101 and on the east by an active channel of the bay; the northern boundary is in line with Ivy Avenue and the southern boundary is in line with Market Avenue.

## Transportation Planning Rule (OAR 660-012), as amended

### Summary

The Transportation Planning Rule (TPR) implements Oregon Statewide Planning Goal 12, which supports transportation facilities and systems that are safe, efficient, and cost-effective and are designed to reduce reliance on single-occupancy vehicles. The objective of the TPR is to reduce air pollution, congestion, and other negative impacts to livability and to maximize investments made in the transportation system.

### Influence on Project

The main function of the TPR is to guide the preparation of transportation system plans and updates to them. The City adopted an updated TSP in 2020 that is consistent with the TPR. The summary of the TSP and its relevance to the Blueprint is below.

## Access Management Rule (OAR 734-051), as amended

### Summary

Oregon Administrative Rule (OAR) 734-051 defines the state's role in managing access to highway facilities in order to maintain functional use and safety and to preserve public investment. Oregon Highway Plan (OHP) Policy 3A and OAR 734-051 set access spacing standards for driveways and approaches to the state highway system. The most recent amendments presume that existing driveways with access to state highways have written permission from the Oregon Department of Transportation (ODOT) as required by Oregon Revised Statutes (ORS) 734. The standards are based on state highway classification and differ depending on posted speed and average daily traffic volume.

### Influence on Project

In developing recommended changes to roadways within the study area, the Blueprint will need to ensure that access and spacing to and on US 101 comply or move in the direction of meeting the standards.

## Oregon Transportation Plan and Oregon Highway Plan (with 2018 amendments)

### Summary

The Oregon Transportation Plan (OTP) is the state's long-range multi-modal transportation plan that addresses the future needs all modes of Oregon's transportation system through the year 2030. The primary function of the OTP is to establish goals, policies, strategies, and initiatives that are translated into a series of modal plans, including the Oregon Highway Plan (OHP). It assesses state, regional, and local public and private transportation facilities. In addition, the OTP provides the framework for prioritizing transportation improvements based on varied future revenue conditions, but it does not identify specific projects for development.

The OTP provides broad policy guidance and sets seven overarching goals for the state. The seven goals are Goal 1 – Mobility and Accessibility; Goal 2 – Management of the System; Goal 3 – Economic Vitality; Goal 4 – Sustainability; Goal 5 – Safety and Security; Goal 6 – Funding the Transportation System; and Goal 7 – Coordination, Communication, and Cooperation.

Through these goals and associated policies and strategies, the OTP emphasizes:

- Maintaining and maximizing the assets in place.
- Optimizing the performance of the existing system through technology.
- Integrating transportation, land use, economic development, and the environment.
- Integrating the transportation system across jurisdictions, ownerships, and modes.
- Creating sustainable funding.
- Investing in strategic capacity enhancements.

The OHP is a modal plan of the OTP that guides ODOT's Highway Division in planning, operations, and financing. Policies in the OHP emphasize the efficient management of the highway system to increase safety and to extend highway capacity, partnerships with other agencies and local governments, and the use of new techniques to improve road safety and capacity. These policies also link land use and transportation, set standards for highway performance and access management, and emphasize the relationship between state highways and local road, bicycle, pedestrian, transit, rail, and air systems.

US 101 is classified as a Statewide Highway, National Highway System (NHS), National Network (NN—a federal truck/freight route designation), state Freight Route (FR), Reduction Review Route (RRR), and Scenic Byway (SB).

### Influence on Project

Projects proposed as part of the Blueprint that affect US 101 need to comply with, or move in the direction of meeting, the OHP safety, access, and mobility standards and targets.

## City Council 2019-2021 Goals

### Summary

The City has eight Council 2020-2021 Priorities. The key two priorities relevant to the Blueprint are:

**The Coos Bay City Council has identified economic development as a priority.**

**The Coos Bay City Council has identified maintenance and repair of the City's Streets, Parking and Street Lamp Infrastructure as a priority.** Two measures of this priority relative to the Blueprint include:

- 1) Evaluate traffic patterns and competing transportation uses of Front St to develop a traffic / pedestrian safety plan (To be completed by FYE20) and
- 2) Develop a parking lot on the property formerly used as a scrap yard located on N Front St. (To be completed by FYE21)

### Influence on Project

The Blueprint objectives address the Council goal priorities and implementation measures.

## City Comprehensive Plan (2010)

### Summary

As early as 1978, when the comprehensive plan was first developed, the community articulated the desire for increased public access to the waterfront. Redevelopment of Front Street is stated as a key economic development opportunity. The Land Use Plan element uses this as a "...basic assumption about Coos Bay's future growth: That the waterfront areas are an asset to the city's water-dependent commerce and industry and are also major scenic attractions." The comprehensive plan also identifies specific recreation facilities along the waterfront that will both "provide public recreational benefits" and "improve blighted and deteriorated areas":

- Improved public access to the waterfront
- Establishment of small parks along the waterfront
- Addition to boat moorage facilities and boat launch lanes
- Downtown waterfront boardwalk
- Multiple-use path

The goals, policies, and strategies relevant to the Blueprint are:

**Economic Development Goal 2: Maintain and expand a diversified economy.**

Policy 2.1 Encourage expansion of recreational, cultural and eco-tourism industries by supporting, enhancing and expanding amenities and infrastructure from waterfront development to lodging options, including shopping, arts and entertainment.

Policy 2.2 Direct public investments toward creating an attractive downtown and waterfront setting that enhances Coos Bay and the Empire districts as areas where people want to live and do businesses.

Economic Development Goal 6: Maximize use of Coos Bay’s unique geographic and recreational assets and cultural heritage.

Policy 6.1 Maximize the potential uses and benefits the waterfront and deep-water port offers to the city and region as a whole.

Policy 6.3 Promote the waterfront as key to a recreational center and opportunity to increase awareness of Coos Bay’s rich maritime and logging history.

Policy 6.4 Promote the development of walking and bike trails throughout the City, ultimately linking with our neighbors, and continue to work towards the Coos Bay Waterfront Walkway to the North Bend Boardwalk for the mutual benefit of area residents, businesses and visitors.

**Recreation Policy R.5** Coos Bay shall utilize small city-owned, deeded, or dedicated undeveloped areas as open space, recognizing that open space alone is recreationally valuable,

### Influence on Project

Realization of the Blueprint objectives will implement the relevant economic development and recreation goals, policies, and strategies within the Front Street area.

## City Downtown Urban Renewal Plan (1998)

### Summary

The 1988 Coos Bay Downtown Urban Renewal Plan and Report were adopted in 1988 with goals relevant to the Front Street Blueprint area:

1. **Develop the city's waterfront** to enhance its potential for recreation, tourism and other commercial activities while preserving its alternate role as a working waterfront which supports the area's forest products and marine related economy.
3. **Improvement of streets, utilities and other essential infrastructures** in areas of the city within the district where they have deteriorated, are non-existent or where modifications are necessary to support and/or encourage the expansion of new commercial and industrial activity.

The Urban Renewal Plan classifies potential urban renewal projects in three general, broad categories: Waterfront Development, Core Area Revitalization, and Streets and Infrastructure. The **waterfront projects** within and relevant to the Blueprint are:

2. Pedestrian access across Southern Pacific Railroad tracks at two points in the downtown core area. Access anticipated to include automatic crosswalks with control gates.
3. Observation deck with connecting walkway to shore and interpretive displays located somewhere along the waterfront between city limits at the north and the downtown core.
7. Development of parking structure.
9. Reconstruction of Front Street from Market to Hemlock.

10. Acquisition of property and construction of a boat ramp in the Cedar area along Front Street.

Most of the streets and infrastructure projects were on US 101. The **streets and infrastructure projects** relevant to the Blueprint study area objectives are:

4. Develop and or maintain existing streets as recommended by Bay Area transportation study and overlay plan.

5. Rebuild Front Street from Market Avenue to Hemlock Avenue.

The Urban Renewal Plan establishes the circumstances in which the Urban Renewal Agency may acquire land without amendment to the Plan: for right-of-way, for public uses such as parks and parking, and for health and safety.

### Influence on Project

The Blueprint is consistent with the relevant Urban Renewal Plan goals 1 and 3, implements the street, parking, and wayfinding projects and facilitates the redevelopment projects within the study area.

## City zoning, ordinances and associated street standards

### Summary

Consistent with the Comprehensive Plan, the City's Development Code was amended to create the Waterfront Heritage District with specific authorized land uses and development standards envisioned in the 1998 Front Street Master Plan. All of the study area is zoned Waterfront Heritage (W-H) with three zoning subdistricts: Core Area (WH-1) from Alder Avenue to Date Avenue, Transition Area (WH-2) from Commercial Avenue to Fir Avenue, and Central Dock Area (WH-3) from Fir to Ivy Street.

All commercial, industrial, and civic uses which are water-dependent or water-related are permitted east of Front Street. Non-water-dependent and non-water-related permitted uses in all areas of W-H include a wide variety of residential, civic, and commercial uses, such as community recreation, dining, and farmers' markets. Conditional uses are bus shelters, business equipment sales and service, consumer repair service, waterfront inns in WH-2 and WH-3, and manufacturing in WH-3, and horticulture. Prohibited uses are educational services; automobile uses and storage except boats, agricultural sales/services, building/property maintenance services, fuel sales other than marine, and transportation services except rail and marine. The code's restrictions on permitted uses will likely keep the area smaller in scale and its limit on building heights will likely preserve views. For example, retail sales are limited to buildings less than 10,000 square feet and childcare facilities are limited to fewer than 13 and must be accessory to a permitted use.

The W-H district includes architectural design. The section encourages consideration of historic elements and emulating existing features, but does not include specific prescriptive standards. It does include sign standards.

On property adjacent to the waterfront, ground-level commercial or civic uses must be water-oriented and provide goods and services to the general public, and non-industrial development abutting the waterfront must provide a view of the water from the interior of the building.

The code discourages curb openings onto Front Street. Off-street parking is not required except for waterfront inns in WH-2.

The southernmost parcel has the Coos Bay Estuary Management Plan (CBEMP) 44DA designation, and the northernmost parcel in the study area has the designation 44bUD.

Aquatic management segments extend waterward from the “line of non-aquatic vegetation.”

*Development Aquatic areas are managed for navigation and other water-dependent uses, consistent with the need to minimize damage to the estuarine system. Development Aquatic areas include areas suitable for deep or shallow-draft navigation (including shipping and access channels or turning basins), sites and mining or mineral extraction areas, and areas adjacent to developed or developable shorelines which may need to be altered to provide navigational access or create new land areas for water-dependent uses.*

44DA (Upper Bay) is to be managed to provide continued essential water access for the upland water-dependent uses. It allows docks, marinas, recreation facilities, and utilities.

Shoreland management segments extend inland from the “line of non-aquatic vegetation” to the Coastal Shoreland Boundary.

*Urban Development areas are managed to maintain a mix of compatible urban uses, including non-dependent and non-related uses. Urban Development areas include areas presently suitable for residential, commercial, industrial or recreational development, generally at intensities greater than would be found in rural areas.*

44bUD (Upper Bay – Isthmus Slough) is to be managed to protect existing uses and to allow new water dependent uses, water-related uses, and non-water-dependent uses consistent with a mixed-use emphasis. In addition to the 44DA uses, it allows more uses, including commercial, industrial and Port Facilities, and land transportation facilities.

The CBEMP encourages recreation facilities and boat ramps specifically:

*32. BOAT RAMPS Local government shall encourage the provision of new boat ramps and the repair and improvement of existing boat ramps and facilities in areas designated to allow that use. This strategy recognizes the need for facilities to accommodate recreational boating access.*

*33. WATER-BASED RECREATION Local governments support increased use of the Coos Bay Estuary for water-based recreation.*

### Influence on Project

The Blueprint’s wayfinding element will need to ensure that it is consistent with the sign standards in W-H.

The northern most and southern most parcels have additional standards that must be met, in accordance with the CBEMP.

## City Transportation System Plan (2020)

### Summary

The Transportation System Plan (TSP) goals and policies are to provide a transportation system that provides accessibility and connectivity, safety, mobility, equity, community and economic vitality; is consistent with state and local planning; ensures strategic investment; and enhances health.

The TSP offers a menu of capital projects that can be selected as funding sources become available or as maintenance, improvements are made. Recognizing that current funding resources are not sufficient for implementing all of the city improvements, there are two tiers of projects. Tier 1: Financially Constrained Improvements are reasonably likely to be funded with existing sources, and Tier 2: Needed but Unfunded, which would require new funding sources for implementation (e.g., grants, new local revenue streams, and private development).

The Tier 1 capital project within the Blueprint study area is Project 9: US 101 Downtown Pedestrian Crossings: Improved bike/pedestrian crossings across US 101 to be consistent with Front Street Action Plan

The Tier 2 capital projects within the Blueprint study area are Project 12: Connect the Boardwalks North Bend, Mill Casino and Coos Bay Boardwalks: Connect the area boardwalks to create a five mile uninterrupted boardwalk, and Project 21: Front St Bicycle Facilities Front St: Identify opportunities for bicycle facilities on Front St as development occurs.

The Blueprint Memorandum 2: Baseline Assumptions and Inventory summarizes information about the transportation system and conditions.

### Influence on Project

The Blueprint is consistent with the goals and policies of the TSP. The purpose of the Blueprint is to refine and implement Projects 9, 12, and 21.

## Front Street Action Plan (2017)

### Summary

The Action Plan study area extends north to the city limits. The south, east, and west boundaries are the same as the Blueprint study area.

The City developed the 2017 Front Street Action Plan to build on the Waterfront Park and Walkway Plan (2012), the Comprehensive Plan update (2010), the Front Street Master Plan (1998), and the Downtown Urban Renewal Plan (1988). The purpose of the Action Plan is to “identify implementable actions in the Front Street area that increase connectivity, foster community access to the waterfront, attract private investment, and diversify Coos Bay’s economy” from resource-based to service oriented.

The goals and objectives of the Action Plan are consistent with the 1988 Master Plan, but the Action Plan recommends “greater partnerships with community organizations and a more incremental approach to Front Street investments,” focusing on improvements in the area to enable redevelopment of available sites. The Action Plan identifies private, community, and public partners and their roles. Public input emphasized resumption of Front Street’s function as a “vibrant, public place.”

The Action Plan identifies the area's key assets as waterfront views, waterfront access, and an authentic working waterfront. The main challenges are aging stormwater and sewer infrastructure, conflicts due to the rail line, potential need for remediation from industrial uses and fill material, and location within the floodplain and the tsunami inundation zone.

The Action Plan prioritizes **four types of investment**:

1. Open space and pedestrian connectivity.
2. Employment uses that require access to the waterfront for success.
3. Improvements to the transportation network that improve multi-modal safety.
4. The need for public transit of some kind to the area.

It also prioritizes **three key themes**:

1. Pedestrian and bicycle access to the waterfront. Extend the Coos Bay Boardwalk along the east side of Front Street as a 14-foot-wide multi-use path to the Coos History Museum. add crossings of Highway 101, and change traffic flow along Front Street so that north of Alder Avenue would be one way, allowing for on-street parking.
2. Programming and amenities. Provide a new light watercraft launch at the Museum, public open spaces, and restaurants.
3. Celebrating Front Street's heritage as a working waterfront and provide public restrooms.

The Action Plan identifies **projects** in three categories:

**Near-term catalytic projects (A series):**

A1: Public Waterfront Access Improvements (install boat launch south of Museum; Improve the Date Avenue right-of-way)

A2: Food Truck Attraction Strategy

A3: Facade Improvement Program Enhancements

A4: Track Opportunity Sites with a property database; work with property owners to improve buildings and recruit potential tenants

A5: Funding Toolkit and Partnerships

A6: Floodplain Mitigation provide information and technical assistance to property owners

**Development supportive projects (B series):**

B1: Historical Wayfinding

B2: Restaurant Recruitment Strategy

B3: Environmental Assessment and Cleanup (selective removal of existing piles; work with property owners to evaluate and address potential soil, sediment, and/or groundwater contamination)

B4: Create Supportive Environment for Public Events

B5: Public Parking Management Strategy including shared parking

### **Infrastructure Projects in two subcategories (C series):**

#### Connectivity and Amenity Enhancements:

C1: Pedestrian North- South pathway along the east side of Front Street. (Coos Waterfront Walkway)

C2: Install two Bicycle/ Pedestrian Crossings across Highway 101

C3: Circulation and Connectivity Improvements

C4: Access/Intersection Improvements

#### Utility Infrastructure Enhancements:

C5: Replace Sewer Collection System

C6: Replace Storm Drain System

#### Influence on Project

This Blueprint is intended to guide near-term actions, and therefore focuses on readily achievable improvements. It addresses investment types 1 and 3 (open space and pedestrian connectivity, improvements to the transportation network that improve multi-modal safety) and supports types 2 and 4 (waterfront-dependent employment and transit). The transportation analysis addresses key theme 1 (pedestrian and bicycle access) and the wayfinding addresses theme 3.

The Blueprint implements Development Supportive Project B1: Historical Wayfinding, and all of the Connectivity and Amenity Enhancements Infrastructure Projects: C1-C4.

## **Front Street Master Plan (1998)**

### Summary

The Master Plan's three goals are to increase public access and historical and cultural connections to the waterfront, encourage development (including increasing the number of allowed uses), and support a diversified economy by developing a mixed-use area.

The Master Plan lists the area's challenges as infrastructure deficiencies, vacant properties, and a need to mitigate potential conflicts between existing active businesses and future redevelopment. Design proposals in the plan included heritage gateways, a waterfront boardwalk, pedestrian enhancements (e.g. bulb outs, crossings), and two piers at Alder and Date Avenues. The Master Plan provides a comprehensive historic context of the area, but the property information and public input is outdated.

### Influence on Project

The Master Plan identifies the needs listed in later planning efforts, particularly the Action Plan: better connectivity, wayfinding signs, recognition of historic heritage, and integration of new uses with the water-dependent uses. The Master Plan developed the standards for the Waterfront Heritage District, which is summarized above.

## Coos Waterfront Park and Walkway Concept Plan (2012)

### Summary

The Concept Plan provides the development and planning history of the study area. Front Street and the waterfront were constructed on 15 feet or more of fill on marsh and tidal flatlands beginning in the 1860s. The first revitalization effort was the construction of the Coos Bay boardwalk in the 1990s. In the early 2000s, the Flags & Flowers plan improved waterfront aesthetics with hanging baskets, planters, benches, and decorative flags, but did not address access. The Coos Waterfront Walkway Partnership formed in 2008 to focus on improved access to the Coos Bay and North Bend waterfronts. The Partnership gathered input from landowner meetings and public open houses in 2010. The main interests were in vendors/gift shops, restaurants/food stands, and public art. The main concern was nighttime safety at shelters and restrooms.

The resulting Concept Plan vision statement emphasizes connection, accessibility, an appreciation for industrial waterfront uses, and non-motorized recreation. It contains objectives in seven categories:

- Recreation—Emphasize the working waterfront, aesthetic improvements, nonmotorized access, public art
- Wildlife, Water Quality and Aquatic Habitat—Use native plants, protect views, preserve and enhance water quality
- Public Safety—Reduce user conflicts, meet or exceed ADA standards, incorporate safety design features that consider mixed use
- Public Relations, Information and Cooperation— Promote economic, health, transportation, recreation benefits; develop regional partnerships
- Maintenance—develop public-private partnerships for management, use natural long-lasting materials to minimize maintenance
- Community Cohesion—redevelop blighted areas, accommodate a broad range of activities
- Signage, Interpretation and Education—Develop a few consistent themes, such as human history and culture; maritime, shipbuilding, fishing, working waterfront; logging, mills, lumbermen; and/or current land use (industry, recreation, economic activity)

The Concept Plan lists five priority project locations, three of which are within the study area. Location 3 is a low priority privately owned property between Ivy Street and Greenwood. Location 4 is the Coos History Museum, constructed and opened in the fall of 2015. Location 5 is from Fir Avenue to Commercial Avenue. According to the Concept Plan, “[t]his section does not require additional improvements for transportation but may benefit from signage or other changes to direct recreational users and visually connect Front Street to the other sections of park and walkway.” Nevertheless, future ideas for the waterfront as a whole are for transportation facilities: a water taxi, a trolley car along the existing rail track, and a bicycle trail along the rail line to Coquille. With the Port’s purchase of the CBR and rehabilitation and restoration of service, the trolley car is not feasible.

### Influence on Project

The Front Street Blueprint will implement the vision and objectives of the Concept Plan and continue the aesthetic improvements of the earlier efforts. The Concept Plan emphasizes balancing recreation access with reducing conflicts with and appreciation of the working waterfront, and the Blueprint should include measures that ensure this priority.

## Oregon International Port of Coos Bay Strategic Business Plan (2015)

### Summary

The Strategic Business Plan focuses on Port-owned properties and the Port’s function as the lead local agency for dredging and navigation improvements in Coos Bay. The Port’s Vision notes: *The Coos Bay harbor is experiencing the renewal of maritime commerce driven by Port of Coos Bay managed public investments in navigation system improvements and freight rail infrastructure benefitting Coos Bay Rail Link. Long-term planning and improvements for the Port’s Charleston facilities drive both private-sector and public agency investments in the seafood industry, recreational tourism, research and education. Oregon’s bay area is prospering from a diversified regional economy and new employment opportunities.* The Port’s mission is: *Promoting sustainable development that enhances the economy of southwest Oregon and the State.* While the vision focuses on the navigation system, Coos Bay Rail Link (CBR), and the Charleston Marina (particularly commercial fishing); the Business Plan notes the Port’s willingness to collaborate with private and public entities to support tourism as an economic development driver in the area.

The Port completed acquisition of the Coos Bay Rail Link (CBR) in 2010 and restored service to the 134-mile-long route in 2013. The CBR runs on Front Street through the study area. The Port, in conjunction with ODOT and the City, has completed road, sidewalk, fence and other safety improvements in recent years. The Plan’s CBR strategies are to increase revenue, leverage funding, and continue repair and maintenance activities. In the study area, the repair and maintenance activities would be track rehabilitation.

Three of the Port’s Upper Bay Properties are directly north of the study area.

**Table 1: Port Upper Bay Properties Adjacent to Study Area**

Plan Map No.	Tax Lot Number	Appx. Acres	Property Description	
9	25S13W22DD-6600 1610 Bayshore Drive	0.84	Dolphin Terminals	Log ship mooring and loading not used since 1990s
10	25S13W26BB-100 -101Z1	0.8 0.6	Orcas Dock	Leased to USCG for Cutter <i>Orcas</i> , wooden pier, floating dock, wooden pile dolphins, support buildings, gravel parking lot
11	25S13W22DD-5100 -5200 -5201Z1	0.63 0.54 0.14	Citrus Dock	Decommissioned in 1995, large pier, building, walkway, bridge

The Port recognizes that the Dolphin Terminals and Citrus Dock facilities are in disrepair, and that the CBR and limited upland acreage restricts improvements and expansions. Therefore, Strategy 1 is to “[s]eek

new markets for underutilized terminals at market rates. If new markets are not considered viable, then consider demolishing underperforming terminals or docks.”

The two Upper Bay project opportunities are both listed as low priority:

Explore redevelopment opportunities of Port-owned terminals.

Explore partnership opportunities with cities of Coos Bay and North Bend to develop waterfront trail. Likely city-led project. Some siting challenges exist relative to CBR.

### [Influence on Project](#)

The purpose of the Front Street Blueprint is aligned with the Port’s mission.

The CBR line provides an essential function to transport goods through the study area, and the Port and the State have made substantial investments in its rehabilitation. The Port’s economic development support in the area and the location of Coos Rail facilities on Front Street will be considered with the development of the Blueprint. Safety issues and measures to avoid or reduce conflicts between pedestrians and vehicles and the CBR will be evaluated and balanced with an evaluation of if and how the rail facility on Front Street enhance the visitor experience to the project area.

The Dolphin Terminals and Citrus Dock, while outside the study area, are an opportunity for future redevelopment as the Blueprint is implemented and potentially expanded to include these properties.