

This REVISED DRAFT DOCUMENT takes into consideration comments received between July 25, 2012 and July 1, 2013



6 | Implementation Plan



Delmar Loop outdoor dining

Overview

The Plan is an ambitious vision encompassing 162 acres and tens of millions of dollars in private redevelopment value; public capital investment projects; public-private partnerships; and programming, operations, policy, and management requirements. The Implementation Plan outlines key actions by University City, the City of Saint Louis, and their partners and stakeholders to orchestrate development, capital expenditures, and policy decisions in a coordinated way to maximize the value of each investment and overcome pre-existing difficulties.

Parkview Gardens faces several jurisdictional and regulatory challenges to developing a dense, transit-oriented neighborhood with economic feasibility. The Parkview Gardens neighborhood spans two municipal jurisdictions (Figure 59.1); the City of University City (a municipality of St. Louis County) and the City of Saint Louis (an independent city.) The majority of the neighborhood is located in University City, but properties along North Skinker Boulevard that have some of the highest potential development values in the area are located within the City of Saint Louis. In order to maximize redevelopment and capital investment potential, it is important that the geographic area of Parkview Gardens—one-half block north of Olive Boulevard, one-half block south of Delmar Boulevard, the centerline of North Skinker Boulevard, and the centerline of Kingsland Avenue—be given priority over the municipal boundaries.

Additionally, the neighborhood is currently served by three Special Business Districts (SBD) — the Loop Special Business District, the East Loop/Parkview Gardens Special Business District, and the Parkview Gardens Special Business District with non-coterminous boundaries (Figure 59.2.) These SBDs each have special assessments but try to work in coordination with each other.

Finally, as with many contemporary municipal zoning codes, land-use ordinances, building height and setback requirements, and off-street parking requirements that apply to Parkview Gardens don't promote the mixed-use, high-density development necessary to create vibrant, walkable, and transit-served neighborhoods without special variance and rezoning. This impediment of high-density, mixed-use development by right adds unnecessary expense, complication, and uncertainty to the development process.

The Implementation Plan addresses these challenges with recommendations for new regulatory, jurisdictional, management mechanisms, and budget and funding mechanisms to simplify the development process, coordinate redevelopment efforts, and enable new, high-quality, walkable, and transit-supporting development that contributes positively to the historic character and sustainability of the Parkview Gardens neighborhood.

Figure 59.1: University City / City of St. Louis Boundaries & Redevelopment Areas

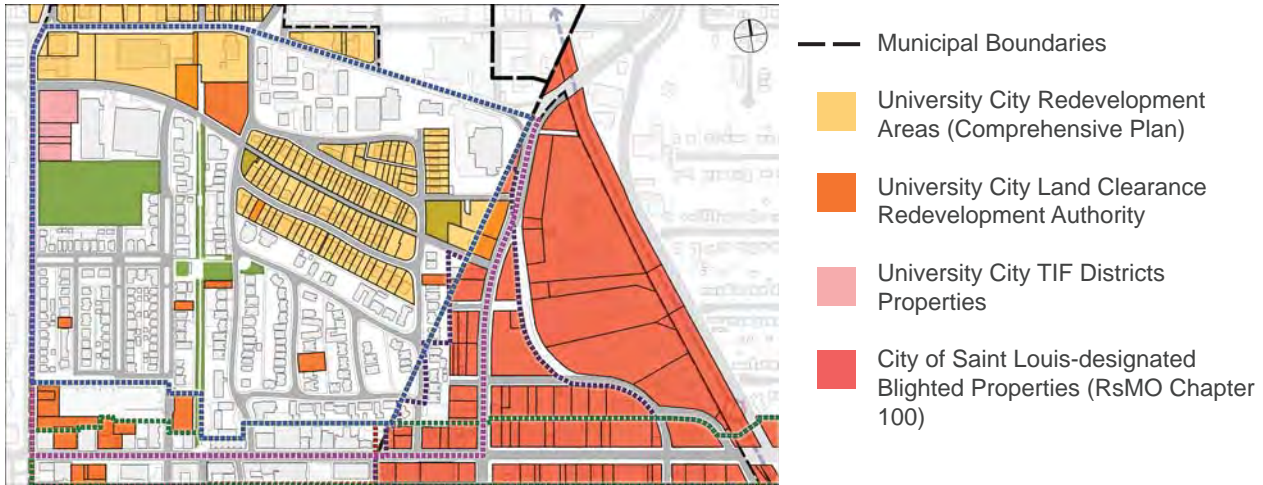


Figure 59.2: Existing Special Business Districts

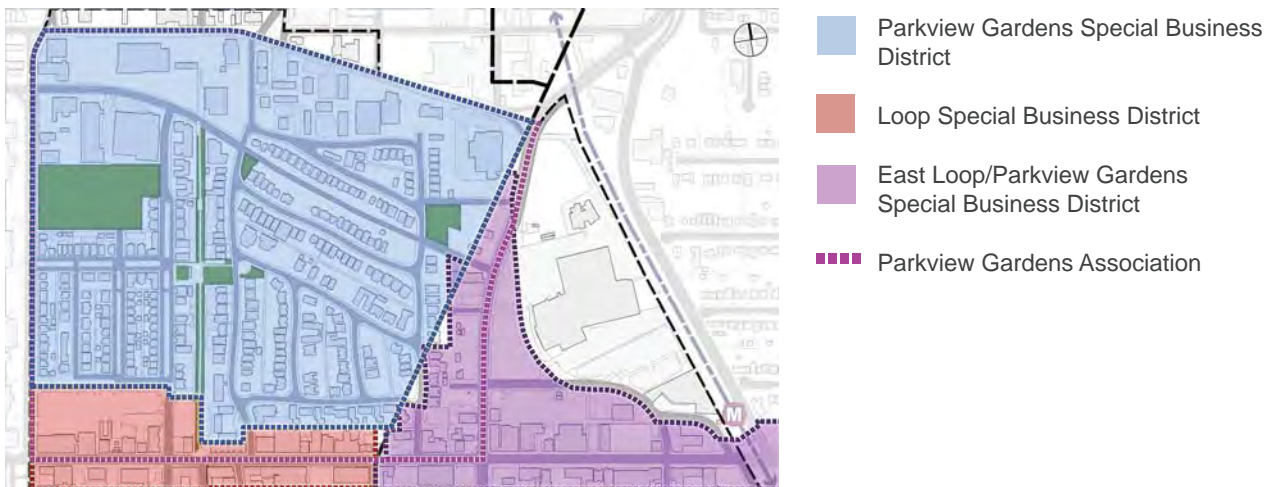
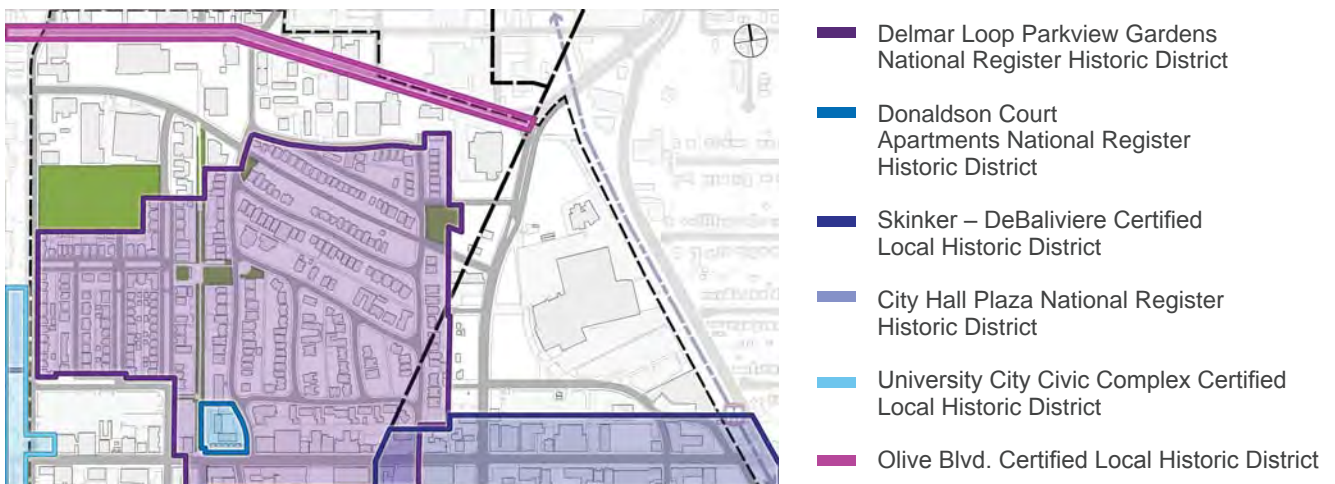


Figure 59.3: Historic Districts





Example T.O.D. apartments

Form-Based Code & Sustainability Metrics Program

The Form-Based Code and Sustainability Metrics Program would codify the Neighborhood Sustainable Development Plan legally into University City's and the City of Saint Louis' municipal ordinances. The Neighborhood Sustainable Development Plan does not include a Form-Based Code and Sustainability Metrics Program, but these are recommended as an implementation tool. It is important to note that the Form-Based Code and other regulations would only apply to new development on vacant sites or redevelopment of sites in which existing buildings are demolished. This Form-Based Code would be based on the Plan's Building Height and Use recommendations and the Sustainability Action Plan. A Form-Based Code is typically comprised of the following components:

Regulatory Plan: The Regulatory Plan locates the zones of particular desired building character (Building Envelope Standards) in the Form-Based Code district. The Regulatory Plan indicates which Building Envelope Standard applies to a particular property within the neighborhood and directs the property developer/owner to the Building Envelope Standards for further details. The Regulatory Plan for Parkview Gardens will be based upon the Building Height and Use recommendations (Figures 59.4 through 59.8) established in the Neighborhood Development Framework Plan.

Building Envelope Standards: Building Envelope Standards define the overall massing of buildings within defined Building Envelope Standard Types. This may include Building Placement, Building Type, Allowable Encroachments, Allowable Use, Thoroughfare Type, Off-Street Parking Requirements, and other building massing requirements applicable to the Building Envelope Standard Types. Building Envelope Standards also direct the property developer/owner to the Building Development Standards, Thoroughfare Standards, and Use Tables for further details. Building Envelope Standards should apply only to new development, as indicated above. Existing buildings and uses should be grandfathered into the Building Envelope Standards.

Building Development Standards: Building Development Standards define design guidelines for buildings. This may include Access Requirements, Open Space Requirements, Sustainability Requirements, Materials, Architectural Standards, Massing and Articulation, Frontage Types, and others. Building Development Standards also direct the property developer/owner to included subsections such as Architectural Standards and Frontage Types for further details.

Thoroughfare Standards: Thoroughfare Standards describe specific improvements to streets and public rights-of-way. This may include Street Configuration, Street Parking, Sidewalks, Medians, Bike Lanes, Tree Lawns, and others. In addition, Thoroughfare Standards can include specific material, performance, and other criteria.

Use Tables: Use Tables indicate the conversion of existing University City and City of Saint Louis Land Uses into more basic Land Use Descriptions as indicated in the Form-Based Code.

A Sustainability Metrics Program for Parkview Gardens would be comprised of established Measurement Criteria, Targets, and Benchmarks for the Initiatives described in the Action Plan. A Sustainability Metrics Program provides ongoing measurement and outcome evaluation for physical, programming, and policy sustainability initiatives and is key component of calibrating and measuring plan implementation for success.

Creation of the Form-Based Code and Sustainability Metrics Program for Parkview Gardens should commence immediately following the adoption of the Plan. This will ensure that new development and capital investments specified in the Plan may begin by right as soon as possible in order to realize the community’s vision and achieve Parkview Gardens’ maximum future sustainability potential.

Figure 59.4: Building Height Massing Model



- 2 - 4 Stories
- 3 - 5 Stories
- 3 - 8 Stories
- 3 - 12 Stories
(w/ setback at 8 stories)

Figure 59.5: Theoretical Building Height Model



Figure 59.6: Theoretical Building Height Plan

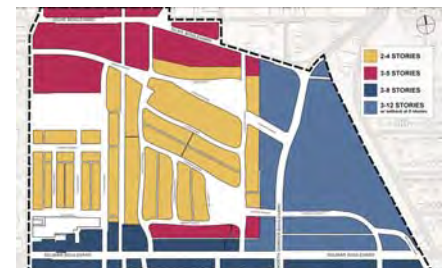
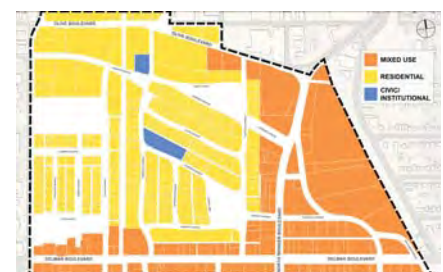


Figure 59.7: Ground Floor Use Plan



Figure 59.8: Upper Floor Use Plan





District Redevelopment Entity

To successfully implement the Parkview Gardens development program and facilitate public space enhancement capital improvement projects, a new District Redevelopment Entity with more expansive operations must be created. The existing Special Business District (SBD) structure in the Parkview Gardens Neighborhood should be modified to serve a number of additional functions. For the Parkview Gardens neighborhood to continue to grow and achieve its future market potential, access to additional sources of revenue must be secured.

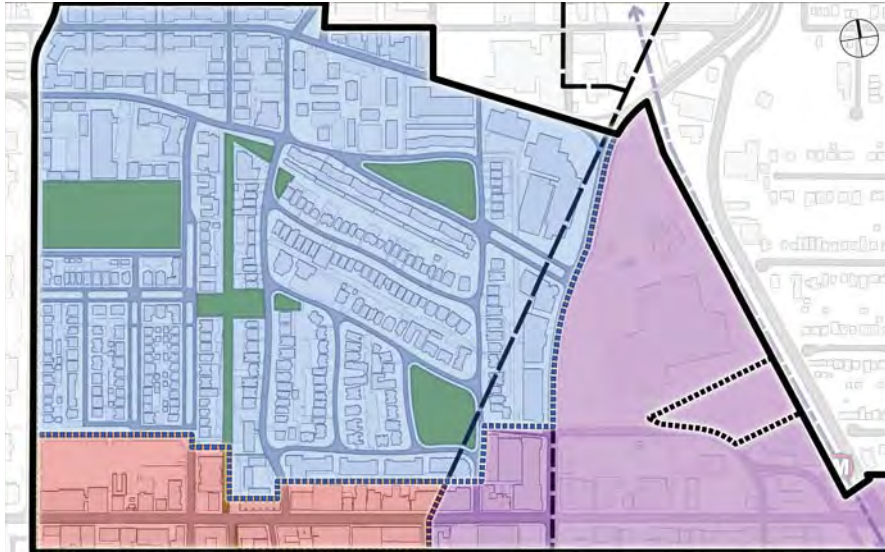
Following the basic implementation recommendations of the Delmar Loop Retail Study (a retail capacity and development study for the Loop Trolley route), the Plan recommends that the three SBDs (Figure 59.2) be replaced with three new Community Improvement Districts (CIDs) (Figure 59.9). The ad valorem assessment that can be levied by an SBD is capped by statute; CIDs are not subject to the same and therefore new CIDs with coterminous boundaries as shown in Figure 59.9 should be established to maximize revenue generation. A non-profit corporate entity should be established to manage the three CIDs and execute the necessary functions in the CID area.

All management, administration, and execution of functions for the area would be carried out through this non-profit corporate entity, likely a 501(c)(3) corporation. The CIDs would serve as the source of the assessment and would authorize the non-profit entity to expend funds on their behalf through independent boards that meet at least annually.

In Missouri, CIDs can be established in two ways: (1) as a separate political subdivision; or (2) as a non-profit corporation. While the latter option would simplify the structure of the governing entity, eliminating the need for a separate 501(c)(3) corporation and multiple CIDs, CIDs established as non-profit corporations have less flexible means of raising revenue. A CID that is a non-profit corporation can only raise revenue via a special tax assessment, whereas a CID that is a separate political subdivision can impose a special assessment, impose a sales tax up to 1%, or impose a real property tax. The establishment of two CIDs as separate political subdivisions enables broader access to revenue sources as well as greater accountability to local property owners in the east and west CID areas. And while at present the principal revenue source will likely remain a special assessment, the flexibility to impose a sales tax or real property tax may be of value in the future.

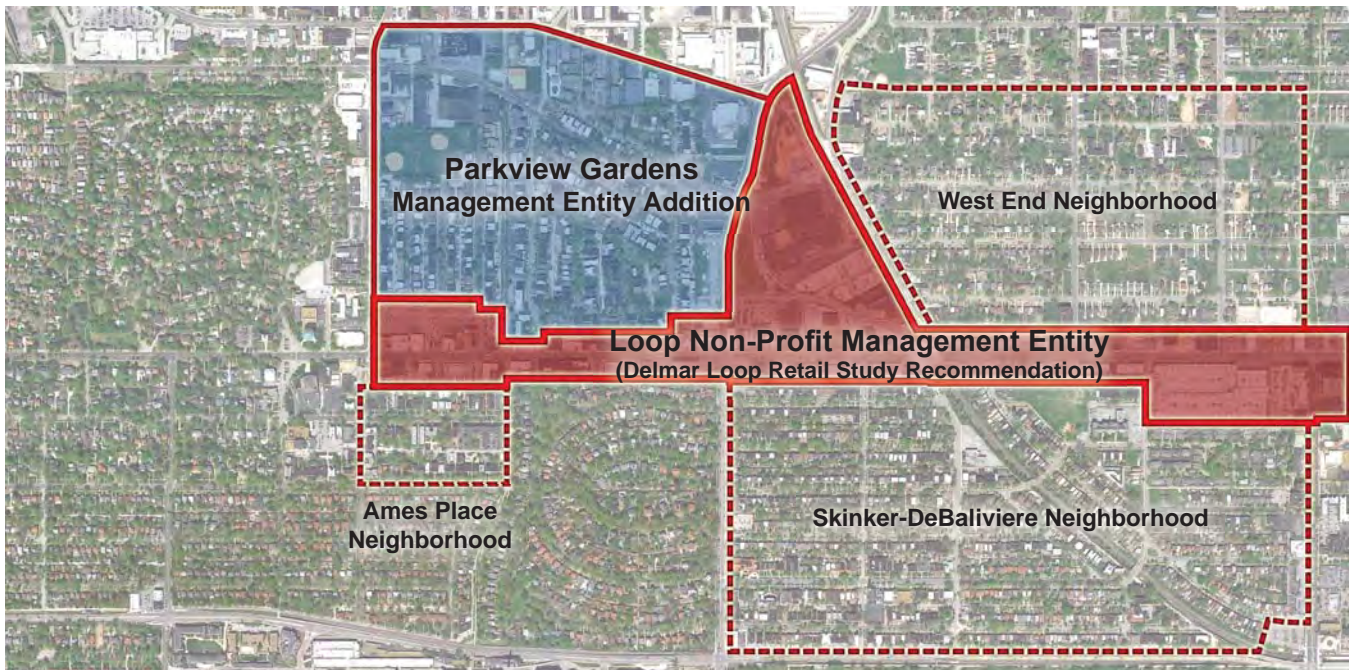
In addition to collecting revenue in the aforementioned ways, both types of CIDs can issue bonds, notes, or other obligations and can secure any such obligations by mortgage, pledge, assignment, or deed of trust on any property or income of the district. This will enable the governing entity to make significant capital improvements and infrastructure investments in the CID area. However, it bears noting that the bonds or other obligations issued by the entity will not be tax-exempt. In addition, either type of CID may finance costs through imposition of fees, rents, and charges for district property or grants, gifts, and donations.

Figure 59.9: District Redevelopment Entity & SBD/CID Boundaries



- Parkview Gardens District Redevelopment Entity
- Parkview Gardens SBD/CID
- Loop SBD/CID
- East Loop/Parkview Gardens SBD/CID
- MetroLink Parking Lot

Figure 59.10: District Redevelopment Entity Context Map





Example apartment/mixed-use

In addition to serving as the managing entity for the two CIDs, the non-profit entity should be designated as a Chapter 353 Urban Redevelopment Corporation, which would provide it with power to initiate redevelopment projects and grant tax abatements. The new non-profit could employ increment financing mechanisms as a means to support redevelopment.

CIDs, unlike SBDs, require a greater amount of consensus from local residents and business owners. To establish a CID, the applying entity must submit a five-year business plan to the host municipality, along with a petition of support signed by property owners that (1) collectively own at least 50% of the assessed value of the real property within the proposed district and (2) are more than 50% per capita of all owners of real property within the proposed district.

These recommendations directly parallel those of the Delmar Loop Retail Study (Figure 59.10) and in effect will expand the Delmar Loop Retail Study Management and Governance Structure recommendation to include the Parkview Gardens neighborhood. This is desirable in that it expands on an existing cross-jurisdictional planning precedent to provide a unified development vision and initiative for the entirety of the Parkview Gardens Neighborhood Sustainable Development Plan planning area.

Project & Program Phasing

Project & Program Phasing identifies and prioritizes public capital improvement projects, establishes required legislation and partnerships, and targets private development in strategic ways to maximize incremental financing and investment leverage potential. Project & Program Phasing should apply to the City of University City, the City of Saint Louis, and their partners and stakeholders. It is divided into four (4) key Phases. This phasing strategy is a recommendation and does not prohibit existing or future development projects from occurring outside of specified phases.

Project & Program Phasing is described in detail on the following pages.



Public Workshop 04



Public Workshop 03



Public Workshop 02

Phase 1 (0-5 Years)

Projects

- Kingsland Walk residential & mixed-use development
- Washington University Off-Campus Housing
- Enright Avenue enhancements and Parkview Gardens Bikeway
- Eastgate South Park
- Enright Avenue extension

Programs

- Establish New Community Improvement Districts (CIDs)
- Establish District Redevelopment Entity
- Establish Public-Private Partnerships
- Adopt integrated funding and management legislation
- Develop and adopt a Form-Based Code, Sustainability Metric Program, and enabling legislation
- Implement street-tree planting & replacement policy
- Implement sustainability policies and incentives
- Conduct 5-year outcome measurement report



Phase 2 (6-10 Years)

Projects

- Olive/Vernon/Kingsland residential development
- Realign Vernon Avenue between Leland Avenue and Westgate Avenue
- Metcalfe Park
- Ackert Walkway and Ackert Park
- North Skinker Boulevard & Delmar Boulevard corner development
- Streetscape and public space enhancements and green infrastructure

Programs

- Implement sidewalk repair and replacement policy
- Implement street repair policy
- Implement sustainability policies and incentives
- Conduct 10-year outcome measurement report



Phase 3 (10+ Years)



Projects

- Eastgate North Park
- North Skinker Boulevard mixed-use/ office corridor
- North Skinker Boulevard & Olive Boulevard corner
- Streetscape and public space enhancements and green infrastructure

Programs

- Implement sidewalk repair and replacement policy
- Implement street repair policy
- Implement sustainability policies and incentives
- Conduct 15+ year outcome measurement report



Ongoing

Projects

- Building Renovation
- Vacant-lot infill development
- Neighborhood build-out
- Streetscape and public space enhancements and green infrastructure

Programs

- Implement sidewalk repair and replacement policy
- Implement street repair policy
- Implement sustainability policies and incentives



Example mixed-use building

Integrated Funding Plan

The Integrated Funding Plan identifies potential sources of funding that can be utilized to implement the Plan. Because some funding sources are more restricted than others, this plan aligns many with specific uses, and identifies areas in which additional gap financing will be needed.

Economic Development Tools: Finance

Realization of this Plan and greater economic prosperity in University City will require a concerted public/private partnership—an alliance of the city on the public side, as well as the area's key private stakeholders and civic interests. In certain instances, future taxes generated by real estate investments might be used to finance current costs of facilitating those improvements. The following list is not intended to be exhaustive, but includes many economic development tools that could aid in catalyzing targeted new investment that will help realize the vision for an improved Parkview Gardens neighborhood.

Cities have available a variety of fiscal tools to induce private investment. These generally fall under the following five categories:

1. Bond financing based on anticipated future revenue
2. Tax reductions
3. Supplemental taxes
4. Grants
5. Capital Improvements

1. Anticipated Future Revenue

In certain instances, future taxes generated by real estate investments can be used to finance current costs of facilitating those improvements. This mechanism is referred to generically as tax increment financing (TIF). The capture of taxes resulting from increased assessed value (the increment) is used to pay debt service on bonds issued to fund selected costs of development.

Tax increment financing is enabled in Missouri by Chapter 99 of the Revised Statutes. It requires the legislated finding of conditions as a blighted area, a conservation area (i.e., not yet blighted but headed that way without public intervention), or economic development area. The maximum allowable TIF period is 23 years, although shorter periods are often approved. The level of subsidy can equal 100% of all incremental new property taxes (payments in lieu of taxes, or PILOTS) and up to 50% of incremental new sales taxes (economic activity taxes or EATS).

A starting point in determining the efficacy of a TIF strategy is to determine what level of taxable investment is likely to be attracted to Parkview Gardens and what value, or increment, can be created for the larger TIF district.

2. Tax Reductions

Personal and real property tax reductions, or abatements, are common

economic development incentives, particularly where significant new real estate investment occurs or new jobs are created. In most instances, the abatements act to reduce operating costs of investment in real estate (office, industrial, retail, or rental apartment buildings) for a designated period of time. In the instance of the Parkview Gardens plan, a strategy of leveraging public improvements to catalyze private investment is being utilized; therefore, tax increment financing is a more useful tool because it provides a revenue stream for financing public improvements.

3. Supplemental Taxes

This section focuses on improvement districts which are sometimes also referred to as special tax districts. In general, an improvement district generates a steady source of revenue to finance services and project costs that are considered “special” to landowners, residents, and businesses within a designated geographic area. Therefore, a separate tax is levied only on those properties, within defined boundaries, that will benefit from these expenditures. We discuss two common forms of improvement districts.

3.1. Business Improvement District (BID)

Commonly known as a Business Improvement District, BIDs in Missouri are often associated with its legal mechanism, Community Improvement District (or CID). A BID typically involves a special property tax that supports an array of needed supplemental programs and services. These often include marketing, maintenance, security, and limited capital improvements, including streetscape enhancements. It is important to note that the imposition of such supplemental taxes or fees does not have to be limited to businesses and commercial properties but can also come from residents and residential properties. Sometimes, tax-exempt properties volunteer to pay the same “taxes” because they, too, benefit from the services and improvements.

3.2. Special Assessment District (SAD)

This form of improvement district is typically used to defray the cost of public improvements among properties that receive a direct benefit. Common SADs involve the extension of infrastructure such as sanitary and storm sewers, and are typically levied on property owners over a fixed period such as ten (10) years. In Missouri, a Transportation Development District (TDD) can be established and allows for a 1% sales tax dedicated to approved transportation development costs. (Technically, a TDD can assess property taxes as well, though it is rarely used in this way.) Enacting a TDD requires approval by voters.

4. Grants

While far less available than in the past, there remain opportunities to obtain grants and soft loans from a wide variety of both public and private sources. Private corporate and charitable foundations, as well as institutions do target their support to different aspects of urban investment and revitalization such as economic development, environment enhancement, historic preservation, and open space and parks. Most government grants are ones resulting from legislators' capacity to target appropriations to special community needs and high profile projects of wide public benefit. Federal TIGER grants, for example, could be explored for Parkview Gardens, but there could be many others.

5. Capital Improvements

Cities often create a capital improvements plan (CIP), which is usually short-term in nature, that allocates money from sources including general funds, street and road funds, and parks and recreation funds. As University City prepares its next CIP, it will likely allocate funds to Parkview Gardens for park and road improvements. These funds can be augmented with the other sources of potential revenue noted above to make public improvements.

Sources of Funding

A number of funding sources could be utilized for the proposed improvements to Parkview Gardens. Some are more restricted in their uses than others, which helps set priorities for how they are applied.

Potential sources of funding for public improvements in Parkview Gardens are varied, but those evaluated for this study generally can be classified under a handful of categories:

- Payments in Lieu of Taxes (PILOTS)
- Special Assessments
- Economic Activity Taxes (EATS)

These sources of funding may not provide all the needed revenue to finance the public improvements identified, but could be supplemented by several additional sources, including:

- Parking Revenues: Existing and potential new revenues from parking can reduce the amount of direct public spending needed to maintain, improve, supplement, and operate public parking facilities.
- Capital Improvements: University City has put together a preliminary Capital Improvements Plan (CIP), which allocates some amount of money to public improvements in Parkview Gardens.
- Grants: University City recently submitted an application for TIGER IV funding and could apply for other federal and state grants in the future.

In addition, there is a Transportation Development District (TDD)—a type of special assessment—already in place along Delmar that imposes an added retail sales tax. While revenues from this assessment cannot be applied to many projects in Parkview Gardens, they could be applied to some projects if they are just outside the district, but nevertheless serve the district.

Geography

Because some funding sources will relate more to the commercial district along Delmar (using sales tax revenue, for example), it is also important to identify where revenues are generated. Some sources can be applied to Parkview Gardens, some cannot, and some can only under certain circumstances. For the purpose of allocating funding, the Parkview Gardens Neighborhood is divided into the following geographical areas.

- A. Parkview Gardens
- B. Skinker Corridor

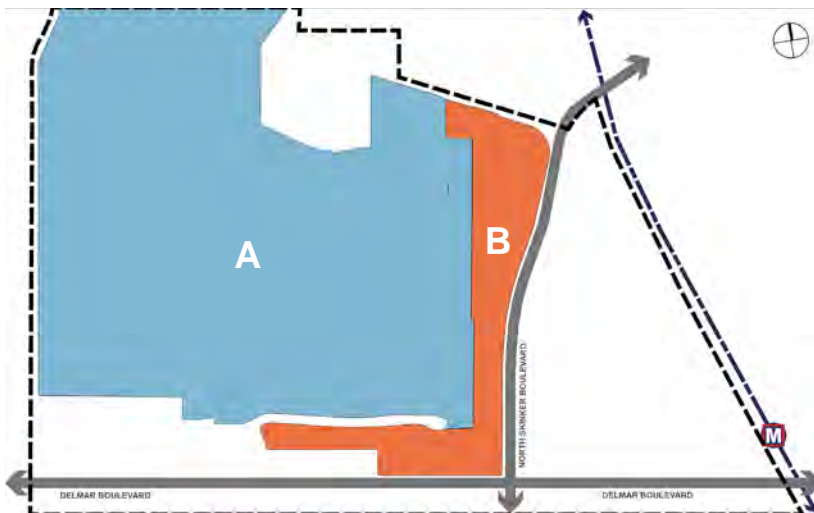


Figure 60.1: Area Identification

Capital Project Costs: What's Included

Capital project costs were calculated in two phases; phase one is considered the "Base Level" and includes all the capital projects key to fulfilling the goals of the Plan, including: Road Extensions; Metcalfe Park (Phase 1); Ackert Park; and Enright Bike Path. "Base Level" capital improvements are included in the analysis of Alternative One, as described in detail below.

Phase two capital projects are considered the "Full Vision" and include all capital projects included in the Plan, including: Road Enhancements; Road Extensions; Metcalfe Park (Full Build-out); Ackert Park and Walkway; the Enright Bike Path; Eastgate South Park; and Eastgate North Park. It does not include ongoing or deferred maintenance. "Full Vision" capital improvements are included in the analysis of Alternative Two, as described in detail on the next page.

Methodology and Evaluation of Alternatives

The various economic development programs identified on previous pages were modeled, using discounted cash flow analysis, to determine the present value of cash proceeds that could be used to finance public improvements. Two alternatives were considered, each with its own phasing projections. The first alternative includes development that was supported as part of Development Strategies' residential market study for the Parkview Gardens Sustainability Plan. The second alternative includes assumptions regarding development of an office district along the Skinker corridor, as well as more aggressive assumptions for residential development in some areas. Following is a partial list of assumptions made as part of this study:

- A baseline assessed value was determined from St. Louis City and St. Louis County records for Parkview. This baseline excludes tax-exempt properties, such as those owned by Washington University. Potential increases in the assessed value are targets for TIF.
- For tax increment financing, most property taxes—city, county, school, etc.—were assumed to be captured.
- St. Louis County and St. Louis City taxes were considered separately, then combined as part of an overall revenue pool.
- All development is phased and discounted to arrive at present values.
- For mixed-use projects, each component was evaluated separately. Baseline assessed values were assigned relative to the proportion of total building square footage that each component contributes to the project.
- This study assumes that a large proportion of existing properties in the heart of Parkview Gardens will be rehabilitated/renovated, leading to higher rents, sale prices, and assessed values. Washington University properties are not included in this analysis, though the return of some properties to the tax rolls would contribute further to the TIF pool.
- A Transportation Development District and Community Improvement District sales tax were evaluated as part of this study, but only for a few selected properties that extend into Parkview Gardens from the Loop. Evaluating all potential revenue sources for the Delmar Loop is beyond the scope of this study.
- Office development along the Skinker Corridor was not evaluated as part of Development Strategies' market study, so assumptions have been made. It is assumed that half of the office development will be institutional (and thus tax exempt, with the exception of earnings taxes), and half will not be tax-exempt.

- Property taxes were not assumed to be captureable as part of a CID district (it would require a 50% majority of residents to vote for a self-imposed tax), retail sales taxes and earnings taxes (in the case of properties within the City of St. Louis) are included.
- It is assumed that parking garages needed to facilitate institutional office will be self-funded, whereas parking garages needed to serve market-rate office development will need public support.
- Office development along the Skinker Corridor is assumed to need three parking spaces per 1,000 square feet of gross leasable area (GLA)—one less than the conventional norm—due to the nearby Delmar MetroLink station.
- Monthly parking revenues are assumed to be \$50 per space. No study has been conducted to determine the reasonableness of this as a parking rate, or the depth of demand, particularly for a public parking garage.
- For University City’s Capital Improvement Plan (CIP), an annual contribution of \$340,000 for Parkview Gardens was assumed over 23 years.
- Capital improvements (such as road replacements, resurfacing, etc.), as well as funds from the capital improvements plan, have been removed from this analysis. This analysis focuses only on the sources and uses of funds for parks, road enhancements and extensions deemed critical by the Parkview Gardens Plan, and parking garages serving **Delmar Loop and the Skinker Corridor**.
- A roughly 900 to 1,000 space parking garage is assumed for **Delmar Loop and the Skinker Corridor** in alternative one; an 1,800 to 2,000 space garage continues to be assumed for alternative two.

Sources include money from payments in lieu of taxes (PILOTS), special assessments, and economic activity taxes (EATS), as well as revenues from parking facilities serving the **Delmar Loop and Skinker Corridor**. Totals under sources represent cash proceeds from the sale of government bonds to finance improvements, and assume a debt coverage ratio of 1.30.

In both alternatives one and two, all sources generated in Area A stay (or are “used”) in Area A, all sources in Area B stay in Area B, and so on. In each case, the sources are insufficient to fund all necessary improvements, so alternative funding sources are needed. These sources could include federal grants, money from fundraising, and money from public/private/institutional partnerships.

A summary of Sources of funding, Uses of funding (capital costs), and Financing Gap for each Alternatives One and Two are provided on the following pages.

Alternative One

As indicated in the diagrams to the left, Alternative One results in the following, categorized by area:

- A. Parkview Gardens
 - Sources (Funding): \$8.3M
 - Uses (Capital Costs): \$8.2M
 - Financing Gap: None**

- B. Skinker Corridor
 - Sources (Funding): \$8.5M
 - Uses (Capital Costs): \$17.0M
 - Financing Gap: \$8.5M**

In Alternative One, all “Base Level” capital improvement projects located in Area A (the neighborhood) can be fully-funded with identified revenue sources. The parking garage in Area C shows a Financing Gap of \$8.5 Million.

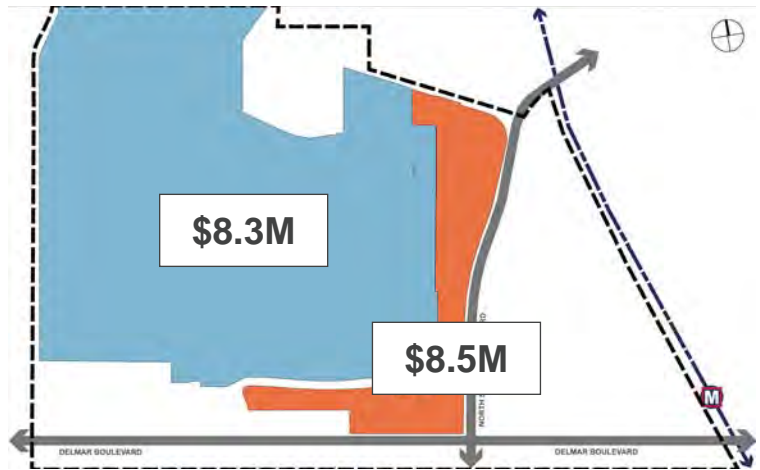


Figure 60.2: Alternative One – Sources

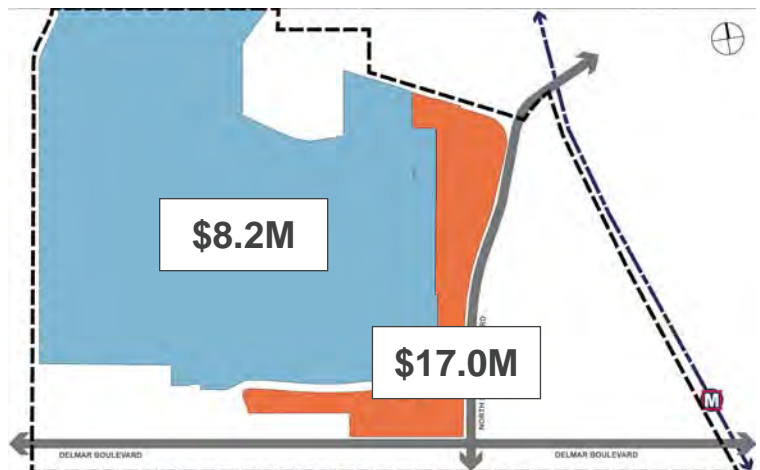


Figure 60.3: Alternative One – Uses

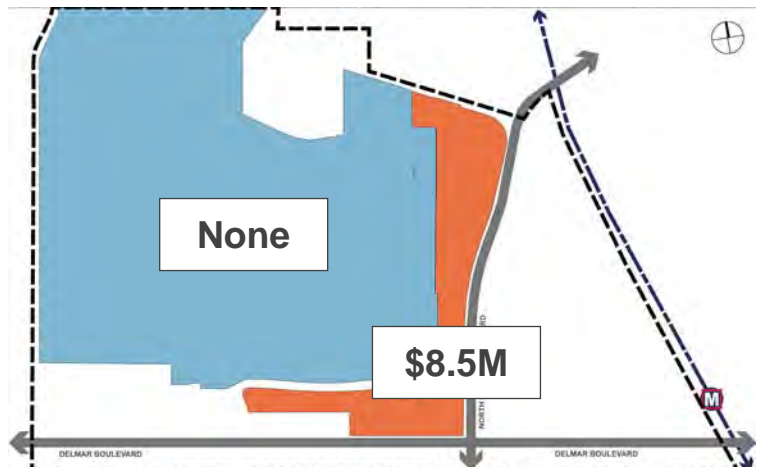


Figure 60.4: Alternative One – Financing Gaps

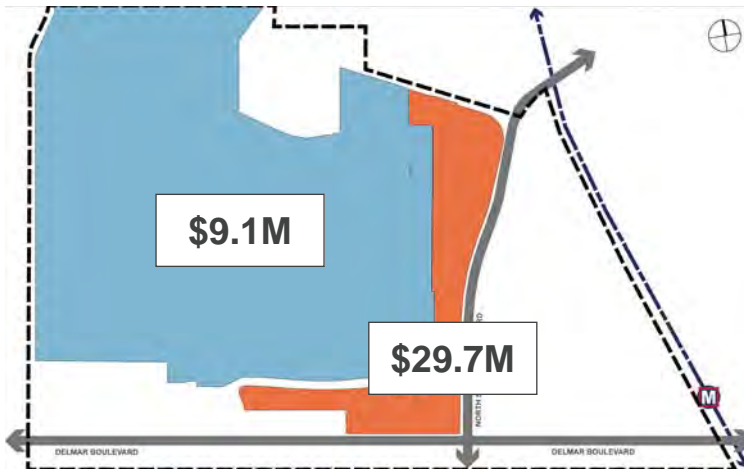


Figure 60.5: Alternative Two – Sources

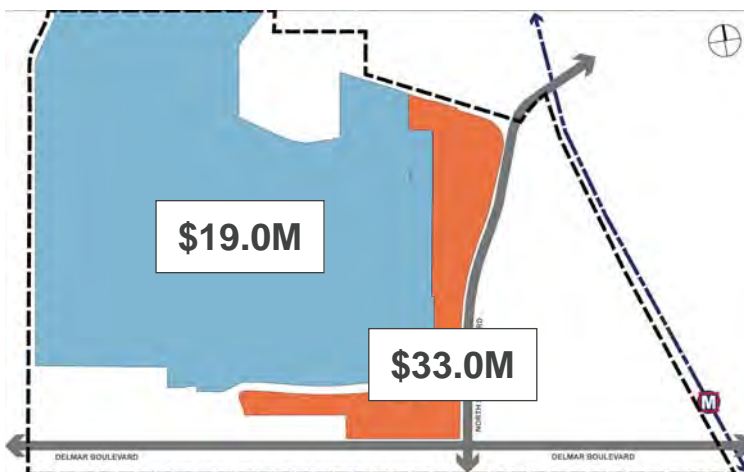


Figure 60.6: Alternative Two – Uses

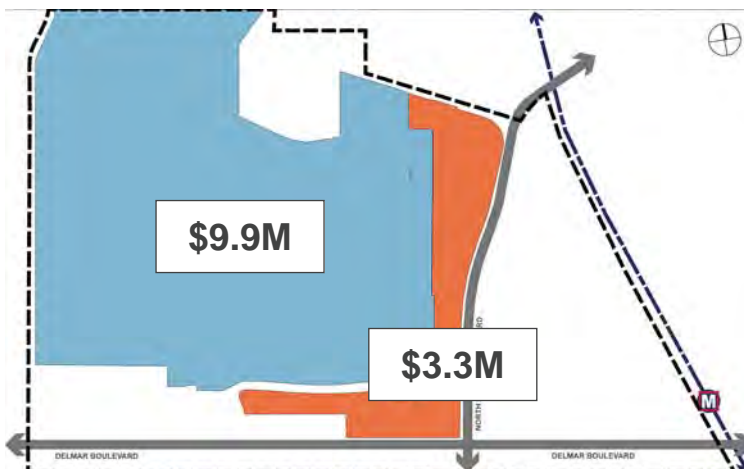


Figure 60.7: Alternative Two – Financing Gaps

Alternative Two

As indicated in the diagrams to the left, Alternative Two results in the following, categorized by area:

| | |
|-----------------------|---------------|
| A. Parkview Gardens | |
| Sources (Funding): | \$9.1M |
| Uses (Capital Costs): | \$19.0M |
| Financing Gap: | \$9.9M |
| | |
| B. Skinker Corridor | |
| Sources (Funding): | \$29.7M |
| Uses (Capital Costs): | \$33.0M |
| Financing Gap: | \$3.3M |

In Alternative Two, financing gaps are present. The Plan recommends that these financing gaps be closed through pursuit of various funding sources, including:

- Increased Capital Improvement Plan (CIP) budgeting
- Federal, State, and local grants
- Public/private partnerships
- Implementation partnerships
- Operations & maintenance agreements and partnerships
- Fund raising

The work that provided the basis for this publication was supported by funding under an award with the U.S. Department of Housing and Urban Development. The substance and findings of the work are dedicated to the public. The author and publisher are solely responsible for the accuracy of the statements and interpretation contained in this publication. Such interpretations do not necessarily reflect the views of the Government.

This material is based upon work supported by the Federal Transit Administration under Cooperative Agreement No. MO-79-1001.

Any opinions, findings, and conclusions or recommendations expressed in this publication are those of the Author(s) and do not necessarily reflect the view of the Federal Transit Administration.



