

**Spokane Central City Line
Potential LPA Extension to Spokane Community College**

Staff Recommendation

July 3, 2014

Introduction

This document discusses the feasibility and staff recommendation for extending the Spokane Central City Line (CCL) Locally Preferred Alternative (LPA) to Spokane Community College (SCC).

The results of the staff technical evaluation indicates that the LPA extension to SCC is justified and beneficial to the Central City Line project based on technical feasibility, ridership metrics, community impact, and performance against Small Starts project criteria.

The analysis of the SCC extension on the following pages is organized into four categories:

- Ridership Response and Service Performance
- Capital and Operating Costs
- FTA Small Starts Project Competitiveness
- Engineering and Environmental Feasibility

Each factor within these categories is evaluated using the scale below to rank the impact of the SCC extension on specific evaluation factors (Exhibit 1):






<i>Impact of SCC Extension on Project Feasibility and Competitiveness: Evaluation Rating Scale</i>	
	Strong Positive Impact of adding the SCC Extension
	Positive Impact of adding the SCC Extension
	Neutral Impact of adding the SCC Extension
	Negative Impact of adding the SCC Extension
	Strong Negative Impact of adding the SCC Extension

Exhibit 1 – SCC Extension Evaluation Rating Scale

Ridership Response and Service Performance

Ridership Response

Ridership forecasting generated by the SRTC¹ regional travel demand model on behalf of the project suggests that the SCC extension will result in ridership growth of approximately 27%, from 2,387 trips per day to 3,042 trips per day (Exhibit 2). STA's current statistics and performance are shown for reference and comparison.

	<i>Base LPA</i>	<i>LPA with SCC Extn.</i>	<i>% Change with SCC Extn.</i>	<i>STA Current (2013 NTD)</i>
Service Provision				
Network Miles ²	3.5	5.75	64%	246
Fleet Requirement (including spares)	7	9	30%	---
Vehicle Miles Traveled (VMT)	197,019	315,853	60%	5,317,034
Revenue Service Hours (RSH)	22,451	30,088	34%	383,357
Veh. Miles Traveled/ Revenue Service Hour	8.8	10.5	20%	13.9
Ridership and Performance³				
Unlinked Trips/Weekday	2,387	3,043	27%	38,037
Unlinked Trips/Year ⁴	686,664	888,556	27%	11,087,049
<i>Unlinked Trips as % of Current STA</i>	<i>6.2%</i>	<i>8.1%</i>	<i>31%</i>	---
Passenger Miles Traveled (PMT)/Day	2,376	3,727	57%	---
Passenger Miles Traveled (PMT)/Year	686,664	1,077,103	57%	47,944,913
<i>PMT % of Current STA</i>	<i>1.4%</i>	<i>2.2%</i>	<i>57%</i>	---
Average Unlinked Trip Length (miles)	1.0	1.2	20%	4.3
Passenger Traffic Density (PTD) ⁵	183,110	187,322	2.1%	194,898
<i>PTD as % of Current STA</i>	<i>94%</i>	<i>96%</i>	<i>2.1%</i>	---

Exhibit 2 – Ridership and Service Performance Summary

¹ Spokane Regional Transportation Council, the Metropolitan Planning Organization for the Spokane region.

² Preliminary estimate of Central City Line network miles based on conceptual design. Network mileage is subject to refinement as terminals are defined and downtown alignment is finalized.

³ Base ridership estimated from the SRTC regional travel demand mode; unadjusted for additional ridership anticipated from higher education and special generators.

⁴ Based on 292 weekday equivalents per year.

⁵ Passenger Traffic Density defined as the number of passenger miles per network route mile per year.

Exhibit 2 also shows that Passenger Miles Traveled (PMT) increases by an estimated 57% with the addition of the SCC extension. As compared to the average trip length in the STA system (4.32 miles), trips on the Central City Line are shorter, reflecting its role as a Central City circulator. However, with the addition of the SCC extension, average trip lengths grow by 20%, reflecting the ability of riders to use the service for longer journeys to and from destinations in the corridor.

The project team notes several opportunities to improve the ridership and service performance of the Central City Line moving forward. Technical evaluation of the SRTC model indicates that the regional travel demand model under-represents ridership generated by higher education students at Gonzaga University, Spokane Community College, and other University District institutions. Comparison with transit ridership at peer institutions across the U.S. suggests that this additional ridership could amount to several hundred additional riders in the project corridor. A travel survey of higher education students is recommended as project development advances to better understand and estimate this travel market.

Other special generators in the Central City Line corridor are also expected to contribute to additional ridership. This includes special event venues and attractions such as the Convention Center, Gonzaga university sporting venues, Riverfront Park, and entertainment venues. Estimates of special generator contributions to ridership will be estimated in future work.

Capturing additional transit trips would improve ridership, service performance, Small Starts Mobility ranking, and Small Starts Cost-Effectiveness ranking. Other opportunities to improve ridership capture have been discussed separately with STA.

Service Performance

Based on the number of Vehicle Miles Traveled per Revenue Service Hour (Exhibit 2), the SCC extension increases the operational efficiency of the Central City Line by approximately 20%. This is due to longer vehicle cycle times, reduced unproductive layover time, as well as higher travel speeds along Mission Avenue. This is why the SCC extension only requires two additional vehicles for the Central City Line vehicle fleet (increase from 7 to 9 vehicles).

Service efficiency and productivity metrics, such as Passenger Traffic Density indicate that the SCC extension performs on par with the base LPA, and does not 'dilute' the efficiency of the Central City Line project.

Exhibit 3 – Summary of SCC Extension Ridership and Service Impacts

Criteria	Impact	Comment
<i>Ridership Response</i>	○	<ul style="list-style-type: none"> The SCC extension results in an increase in ridership and passenger miles traveled that is proportional to the additional capital investment. Additional ridership, particularly from transit-dependent households in the corridor, is important to maximizing the Small Starts Mobility ranking. Preliminary analysis suggests that both the base LPA and the SCC extension will see increased ridership when higher education trips from Gonzaga and SCC are taken into account.
<i>Service Efficiency</i>	○	<ul style="list-style-type: none"> Adding the SCC extension allows for more efficient transit operations. The Central City Line fleet delivers approximately 20% more vehicle miles per revenue service hour due to reduced layovers and longer cycle times. This results in a modest fleet increase from 7 to 9 vehicles to serve the extension.
<i>Service Productivity</i>	■	<ul style="list-style-type: none"> The SCC extension is comparable to the base LPA in terms of passengers per route mile (Passenger Traffic Density) and average vehicle load. Results suggest that reductions in off-peak service levels to match demand are warranted for both the base LPA and the SCC extension.

Capital and Operating Costs

Capital Costs

According to preliminary cost estimate scenarios, the SCC Extension, using inductive-charging battery electric vehicle technology, has a 5% lower capital cost than the 2011 Base LPA using electric trolleybus technology with overhead wire (Exhibit 4). This is in spite of the fact that the Central City Line alignment with the SCC Extension is 64% longer and attracts approximately 27% more trips⁶. This combination of factors suggests that the SCC Extension with inductive-charging battery electric vehicle technology is more cost effective and provides more transit benefit to the community per dollar invested than the 2011 Base LPA scenario.

For the 2011 Base LPA, the traction power system costs, such as overhead wires, poles, feeder cables, substations, and specialized maintenance equipment, represent the largest single capital cost element in the project. Including the related contingency and soft costs, traction power infrastructure represents approximately 52% of the total project capital cost for the Base LPA.

Inductive charging uses in-ground charging stations to energize onboard electric batteries, rather than an overhead trolley wire. Inductive charging is being used for transit revenue service in the U.S. and abroad. As a relatively new technology, STA is aware of the need to closely manage design and implementation of inductive charging. The use of inductive charging technology achieves a capital cost savings while maintaining the fundamental Central City Line premise of service electrification. Exhibit 4 shows that if inductive charging technology is substituted for electric trolleybus technology in the Base LPA scenario, the capital cost of the Base LPA itself is reduced by 25%.

The inductive charging scenarios include an allotment for street improvements and other permanence features (Exhibit 4, Category 10) to compensate of the absence of overhead wire. For the Base LPA, this allotment is \$7 million, reflecting anticipated street reconstruction and enhancement in the Downtown/University District/Gonzaga University corridor. For the SCC Extension scenario, this allotment is increased to \$8 million to reflect additional enhancements in the Mission Avenue corridor. The specifics of the improvement implemented within these allotments will be further defined during Preliminary Engineering, including exploration of infrastructure partnership opportunities with the City of Spokane.

The inductive-charging scenarios also reflect a value engineering cost reduction regarding the anticipated maintenance facility costs to support the Central City Line. This line item (Category 30 in Exhibit 4) has been reduced from \$5 million in the 2011 Base LPA scenario to \$2 million in the inductive charging scenarios.

⁶ Estimated trips based on SRTC regional travel demand model results, excluding additions for higher education ridership or other rider markets not captured in the regional model.

Cost Breakdown by FTA Standard Cost Category ⁷	2011 Base LPA: Browne's Addn. to Gonzaga Univ.		Base LPA + SCC Extension: Browne's Addn. to SCC
	Electric Trolley with Overhead Wire	Battery Electric Vehicle with Inductive Charging System	Battery Electric Vehicle with Inductive Charging System
10 GUIDEWAY & TRACK ELEMENTS	\$150,000	\$7,000,000	\$8,000,000
20 STATIONS, STOPS, TERMINALS	\$4,470,000	\$5,590,000	\$7,640,000
30 FACILITIES: YARDS, SHOPS, BLDGS	\$5,000,000	\$2,000,000	\$2,000,000
40 SITEWORK & SPECIAL CONDITIONS	\$3,250,000	\$2,160,000	\$2,700,000
50 SYSTEMS ⁸	\$17,480,000	\$3,450,000	\$4,900,000
Construction Subtotal (10 - 50)	\$30,350,000	\$20,200,000	\$25,240,000
60 ROW, LAND, IMPROVEMENTS ⁹	\$-	\$-	\$-
70 VEHICLES	\$10,050,000	\$11,025,000	\$14,180,000
80 PROFESSIONAL SERVICES	\$9,110,000	\$6,060,000	\$7,570,000
Subtotal (10 - 80)	\$49,500,000	\$37,290,000	\$46,990,000
90 UNALLOCATED CONTINGENCY	\$14,850,000	\$11,190,000	\$14,100,000
100 FINANCE CHARGES ¹⁰	\$-	\$-	\$-
Total Project Cost (10 - 100) – 2014 Constant Dollars¹¹	\$64,350,000	\$48,480,000	\$61,080,000
w/ 8.7% SALES TAX ON CONSTRUCTION AND VEHICLES ¹²	\$69,950,000	\$52,690,000	\$66,390,000
w/ ESCALATION TO MID-POINT OF CONSTRUCTION - JANUARY 2019	\$75,860,000	\$57,140,000	\$72,000,000
Capital Cost Difference Compared to the 2011 Base LPA	---	-25%	-5%

Exhibit 4 - Central City Line - Estimated Capital Cost (2014 constant dollars)

⁷ Definitions of FTA Standard Cost Categories for capital projects may be found on the FTA website at:

http://www.fta.dot.gov/12305_15612.html

⁸ Systems category includes traction power infrastructure except for Scenario C, which includes inductive charging infrastructure.

⁹ No right-of-way/land acquisition or improvements have been identified to date.

¹⁰ Finance charges will be estimated upon the development of a full project finance plan through the Small Starts application process.

¹¹ Due to rounding of cost figures, the sum of individual line item costs may not equal the project total costs shown.

¹² Preliminary sales tax estimate. Sales tax applicability to public works projects in Washington State is complex and will require further evaluation in future stages of project development.

Cost Effectiveness

Under current federal guidance, Cost Effectiveness for a Small Starts project is based on the annualized *federal* share of the project capital cost, per trip (i.e., \$/trip). Therefore the assumed federal share of project capital funding is a critical determinant in the cost effectiveness rating.

Project sponsors in the FTA Small Starts program typically request a federal share between 50% and 80% of project capital cost. Based on an anticipated local funding commitment, STA intends to request an 80% federal share for the Central City Line capital cost. Under each of the capital cost scenarios presented in Exhibit 4, an 80% federal share is likely to result in a project Cost Effectiveness rating of Medium.

If additional non-federal (e.g. state grant) funding were to become available for the Central City Line project, allowing the federal share of the project to be reduced to 50%, then the project would likely attain a Cost Effectiveness rating of Medium-High.

Based on the project capital costs presented above, Exhibit 5 summarizes the likely Cost Effectiveness ratings based on existing Central City Line capital cost and ridership estimates. The SCC Extension has the advantage of capturing additional ridership relative the additional cost of building the extension, resulting in improved Cost Effectiveness metrics as compared to the Base LPA by itself. Future refinements and optimization of estimated ridership and cost during project development will also influence the Central City Line’s ultimate Cost Effectiveness rating.

	Estimated Cost Effectiveness (Based on Federal Share of the Project Capital Cost)	
	At 50% Federal Share of Capital Cost	At 80% Federal Share of Capital Cost
2011 Base LPA: Electric Trolley with Overhead Wire	\$1.95 Medium-High	\$3.12 Medium
2011 Base LPA: Battery Electric Vehicle with Inductive Charging System	\$1.74 Medium-High	\$2.78 Medium
SCC Extension: Battery Electric Vehicle with Inductive Charging System	\$1.71 Medium-High	\$2.74 Medium

Exhibit 5- Central City Line – Estimated Cost-Effectiveness Ratings¹³

¹³ Based on FTA Small Starts cost annualization factors, pre-engineering cost estimates, and SRTC model ridership estimates.

Operations and Maintenance Costs

Operations and Maintenance (O&M) costs for the Central City Line increase by an estimated 39% with the addition of the SCC Extension (Exhibit 6). This reflects the additional Revenue Service Hours and Vehicle Miles provided over the 5.75-mile alignment. Due to the increased service efficiency of the SCC Extension (e.g., more efficient utilization of the vehicle fleet), the growth in operating costs of 39% is lower than the 64% growth in network miles serviced.

The Cost per Unlinked Trip for the SCC Extension is slightly higher than for the Base LPA. However, the increase in this cost only 4%, while the average passenger trip length with the SCC Extension (Exhibit 2) is 20% higher. This again reflects the operational efficiency of the SCC Extension.

Operating Costs per Revenue Service Hour and per Unlinked Trip are higher than the existing STA fixed route baseline for both the Base LPA and the SCC Extension. This reflects the additional O&M costs of Central City Line amenities and facilities (e.g. stations), as well as unique maintenance attributes of the Central City Line fleet.

Future project development work will refine these initial O&M cost estimates to maximize the project benefit and service efficiency of the Central City Line.

	<i>Base LPA</i>		Base + SCC Extension	STA Current (2013 NTD)¹⁴
	Electric Trolley with Overhead Wire	Battery Electric w/ Induction Charging	Battery Electric w/ Induction Charging	
Operating Costs¹⁵				
Total O&M (per year) ¹⁶	\$3,112,591	\$3,041,098	\$4,164,534.35	\$44,267,858.00
<i>Vehicle Operations</i>	\$1,234,641	\$1,233,315	\$1,710,272.41	\$27,183,490.20
<i>Vehicle Maintenance</i>	\$310,972	\$308,111	\$403,229.32	\$6,416,071.09
<i>Non-Vehicle Maintenance</i>	\$853,522	\$810,027	\$1,107,544.18	\$2,488,467.98
<i>General & Administrative</i>	\$713,458	\$675,302	\$943,488.45	\$8,179,828.73
O&M Cost per Revenue Service Hour	\$138.64	\$135.45	\$138.41	\$115.47
O&M Cost per Unlinked Trip	\$4.51	\$4.41	\$4.69	\$3.99
Annual O&M Costs as % of STA Existing	7.03%	6.87%	9.41%	

Exhibit 6 – Central City Line Preliminary Operating Cost Estimates

¹⁴ Current operating costs reported for fixed route only.

¹⁵ In 2013 constant dollars based on most recent STA 2013 NTD operating cost figures.

¹⁶ Operating costs based on 2013 NTD statistics for Spokane Transit (“motor bus” category) with adjustments for Modern Electric Trolley based on peer system NTD data. Assumes 60’ vehicles and SRTC service plan assumptions.

Exhibit 7 – Summary of SCC Extension Cost and Cost Effectiveness Impacts

Criteria	Impact	Comment
<i>Capital Cost</i>	○	<ul style="list-style-type: none"> The capital cost of the SCC Extension, using inductive charging technology, is significantly lower than the cost of the Base LPA that uses electric trolley technology. This is in spite of the fact that the SCC Extension is 2.25 miles longer than the Base LPA.
<i>Cost Effectiveness</i>	■	<ul style="list-style-type: none"> The SCC extension out performs the Base LPA in terms of Cost Effectiveness. This is because the additional capital costs associated with the SCC Extension are lower than the anticipated increase in passenger trips. Therefore, the capital cost per trip is lower than for the Base LPA alone.
<i>Operating Costs</i>	○	<ul style="list-style-type: none"> Operations and Maintenance costs estimated reflect the superior operating efficiency of the SCC extension. However, the total increase in operating and maintenance costs needs to be considered by STA from an overall project affordability perspective.

FTA Small Starts Project Competitiveness

Federal Transit Administration (FTA) Small Starts discretionary grants are for capital costs associated with new fixed guideway systems, extensions, and bus corridor improvements. To be competitive for Small Starts, projects must have a total net capital cost of less than \$250 million and seek a federal share of less than \$75 million. Greater local or non-federal funding share (preferably, 50% or higher) increases project competitiveness.

The most recent transportation authorization, Moving Ahead for Progress in the 21st Century (MAP-21), increases the number of evaluation criteria for Small Starts projects and requires FTA evaluate the benefits of a Small Starts project against only the federal share of the project when developing the Project Justification rating. Previously, the benefits were evaluated against the total federal and local project cost.

FTA evaluates potential Small Starts projects against a list of nine evaluation criteria when determining which projects to award federal funding. The SCC extension must perform competitively against these criteria to be awarded a Small Starts grant.

The analysis below is based on the New Starts and Small Starts Final Policy Guidance issued in August 2013. Note that FTA has not issued guidance on certain aspects of the Small Starts criteria, including but not limited to Congestion Relief benefits and the potential use of “warrants” to establish project eligibility.

Based on the project team’s evaluation, the SCC extension performs neutral or positively when compared to the base LPA against the Small Starts “Project Justification” Criteria (Exhibit 8). The project team notes that the high FTA benchmarks for the Mobility and Land Use criteria present inherent challenges for any Small Starts project in a city the size of Spokane, due to the sheer number of trips, employment, and residents that FTA requires to obtain Medium rankings for these criteria. The project team recommends that STA consult with FTA about the potential impact of Mobility and Land Use rankings against project competitiveness, as well as any emerging alternative criteria such as warrants that could benefit the Central City Line project.

To optimize project competitiveness, STA seeks an optimum balance of project benefit (e.g. ridership, trips, economic development), project costs, and financial affordability. Achieving this optimal balance is the centerpiece of ongoing project development work anticipated between today and the project’s application for a Small Starts Grant Agreement (anticipated in late 2015).

**Exhibit 8 – Summary of SCC Extension Small Starts Competitiveness Impacts
(Project Justification Criteria)**

Criteria	Impact	Comment
FTA Small Starts - Project Justification Criteria		
<i>Mobility</i>	●	<ul style="list-style-type: none"> Ridership increases with the SCC extension, including transit-dependent rider trips that count as double when calculating the project’s Mobility rating. Total ridership under both the base and SCC extension scenarios will still likely result in a “Low” rating given current FTA ridership breakpoints that are not indexed to the scale of the project or the metropolitan area .
<i>Economic Development</i>	○	<ul style="list-style-type: none"> The SCC corridor contains additional underdeveloped parcels and opportunities for transit-oriented development (e.g. neighborhood centers). Score would depend on City’s willingness to take action on planning policy/zoning changes along Mission in the near term.
<i>Environmental Benefit</i>	○	<ul style="list-style-type: none"> Electric Central City Line vehicles would replace existing diesel bus service, reducing vehicle emissions. The overall impact of this reduction on project competitiveness is expected to be small.
<i>Cost-Effectiveness</i>	■	<ul style="list-style-type: none"> The SCC extension performs comparably to the base LPA in terms of cost-effectiveness, because the ridership increases in proportion with the capital cost.
<i>Land Use</i>	○	<ul style="list-style-type: none"> The SCC extension provides access to additional employment and residential units along the corridor, raising the total amount services by the project.
<i>Congestion Relief</i>	■	<ul style="list-style-type: none"> All projects automatically receive a ‘Medium’ raking on this criterion, pending future FTA guidance on project ranking.

**Exhibit 9 – Summary of SCC Extension Small Starts Competitiveness Impacts
(Local Financial Commitment Criteria)**

Criteria	Impact	Comment
FTA Small Starts - Local Financial Commitment Criteria		
<i>Current Conditions</i>	■	<ul style="list-style-type: none"> This criterion is based on STA's <i>existing</i> financial and asset condition - the SCC extension has no impact.
<i>Commitment of Funds</i>	■	<ul style="list-style-type: none"> The requested FTA share of the capital cost is likely to be identical for both the Base LPA and the SCC Extension scenarios. O&M costs for both the Base LPA and the SCC Extension will likely exceed FTA's 'five percent rule' (of current O&M costs, resulting in additional FTA review of STA's project finance plan.
<i>Reliability and Capacity</i>	■	<ul style="list-style-type: none"> Because STA is a new Small Starts grantee, the fundamental project implementation and institutional risks reflected under this category are similar with or without the SCC extension.

Engineering and Environmental Feasibility

The SCC extension must perform well from a technical feasibility standpoint while minimizing implementation risks and environmental impacts (Exhibit 10). The project team has found that the extension matches or improves on the base LPA when evaluated against the Alternatives Analysis criteria, and also benefits from the proximity of a proposed maintenance facility site near the SCC campus. Both the base LPA and the extension will serve a greater portion of low-income and minority populations compared to the city of Spokane overall and is not anticipated to adversely impact historic, recreational, or noise-sensitive properties or uses.

Exhibit 10 – Summary of SCC Extension Engineering and Environmental Feasibility Impacts

Criteria	Impact	Comment
<i>Maintenance Facility</i>	●	<ul style="list-style-type: none"> The SCC extension provides access to an available WSDOT-owned parcel that is ideally suited for the Central City Line at the eastern terminus, and may be valuable in meeting STA’s system-wide facility needs.
<i>Environmental Risk</i>	■	<ul style="list-style-type: none"> No new impacts on sensitive properties or structures. If an alternative electric propulsion technology such as inductive charging was selected, environmental risk would be minimized since there would be fewer visual impacts and a lower potential to impact historical resources.
<i>Engineering Risk</i>	■	<ul style="list-style-type: none"> No engineering ‘fatal flaws’ were identified with the addition of the SCC extension.
<i>Environmental Justice</i>	○	<ul style="list-style-type: none"> Disproportionate benefit for low-income persons and minorities given demographics of the Logan and Chief Garry Park neighborhoods. Benefits Small Starts “Mobility” ranking, as transit dependent/auto-less populations count double towards ridership.
<i>Title VI</i>	○	<ul style="list-style-type: none"> Additional access to employment and education centers within the corridor and system-wide. The SCC extension introduces opportunities to improve service to Title VI populations through future network reconfigurations.
<i>LPA Alternative Analysis Criteria</i>	○	<ul style="list-style-type: none"> Consistent with all criteria and project Purpose and Need; improves on Base LPA performance against these criteria.

Staff Recommendation

Based on the above evaluation, STA staff has concluded that the proposed extension of the Locally Preferred Alternative to Spokane Community College is justified and beneficial based on technical feasibility, ridership metrics, community impact, and performance against Small Starts project criteria. STA staff recommends modification of the existing LPA to include the SCC extension.

Strengths of extending the Central City Line LPA to Spokane Community College include:

- Consistency with the Central City Line's purpose and need and LPA selection criteria under the 2011 Alternatives Analysis process;
- Increased ridership and passenger miles that are proportionate or lower than the additional cost to the project;
- Increased operating efficiency, including logical connections to other services in the STA network that improve STA's overall service delivery;
- Absence of significant engineering or environmental risks or "fatal flaws"
- Increased competitiveness of the Central City Line project in the FTA Small Starts discretionary capital funding program.

The proposed extension to SCC enhances transit service quality, frequency, and hours in the Mission Ave corridor, including the 4,200 low-income residents and 1,600 minority persons in the Logan and Chief Garry neighborhoods. Many of these residents are transit dependent for access to employment, education, and services.

The SCC extension provides access to 5,500 additional corridor jobs and connects Spokane Community College to other major regional attractions in the Central City. The Central City Line provides enhanced regional accessibility to catalyze economic development on the 11% of land parcels in the corridor that are developable but underutilized.

If an amended LPA including the SCC Extension is adopted, STA retains the option to implement the base LPA as a Minimum Operable Segment (MOS) from Browne's Addition to Gonzaga University if necessitated by financial or other considerations. This MOS can feasibly utilize either trolleybus or battery electric inductive charging vehicle technology. However, it is important to realize that if the 3.5-mile base LPA is implemented as a Minimum Operable Segment, the remaining 2.25 miles of the SCC extension itself is unlikely to be competitive in the Small Starts program as a stand-alone project. This may make it difficult to fund the SCC extension itself as a future addition to the base LPA.