



U.S. Department  
of Transportation  
**Federal Transit  
Administration**

REGION VII  
Iowa, Kansas,  
Missouri, Nebraska

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December 27, 2021

Honorable Tishaura Jones  
Chairperson, Loop Trolley Transportation Development District  
6504 Delmar Street  
St. Louis, MO 63103

Dear Mayor Jones:

Between 2011 and 2015, the Federal Transit Administration (FTA) awarded a total of \$37.45 million to construct the 2.2-mile Loop Trolley project (Loop Trolley). In 2011, FTA awarded approximately \$22.11 million from the FTA's Urban Circulator Discretionary Program (MO-03-0120) to the Loop Trolley Transportation Development District (TDD), and \$2.88 million from the Urban Circulator Discretionary Program to the East-West Council of Governments (EWG)(MO-03-0119); in 2014, FTA awarded the TDD \$1.2 million from the Congestion Mitigation and Air Quality Improvement (CMAQ) Program (MO-95-X264) and \$5.86 million from the Surface Transportation Program (STP) (MO-95-X265); and in 2015, FTA awarded the TDD \$5.4 million from STP (MO-95-X268). As part of the Project Management Plan (PMP) submitted to FTA in 2012, the TDD stated that the Loop Trolley would operate at certain levels of service – seven days per week with five vehicles. Since April 2020, however, the Loop Trolley has suspended service, which raises concerns about the TDD's compliance with the terms of the above FTA grants.

In November 2018, with the approval of FTA's Region 7 Office, the Loop Trolley began revenue service with two vehicles, four days per week, from Thursday to Sunday. In December 2019, due to financial concerns, the TDD requested FTA's approval to temporarily suspend operations for four months – until April 2020. FTA agreed to the four-month suspension. However, the COVID-19 pandemic caused the TDD to further delay restarting operations. As of the date of this letter, the Loop Trolley operations continue to be suspended.

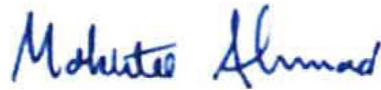
To restart service, the TDD recently submitted a request to the EWG for \$1.26 million in CMAQ program funding. The TDD informed FTA that the CMAQ funding would cover approximately 70 percent of the costs to operate the Loop Trolley for two years with service four days per week. The TDD agreed to contribute \$540,000 in matching funds if awarded the CMAQ funding. On October 27, 2021, the EWG denied the TDD's application for CMAQ funding to restart operations.

While FTA understands that the TDD is attempting to restart transit operations, FTA's Master Agreement provides that a recipient must use the project property continuously and appropriately through the useful life of the property. *See* FTA Master Agreement (18) §§ 19(a)(1) & (2), 19(g)(2). Please be advised the applicable useful life requirements for this project range from 12 to 40 years.

In consideration of the suspension of service on the Loop Trolley, FTA is evaluating whether EWG and the TDD are in compliance with the terms and conditions of each of the five grants that FTA has awarded for the Loop Trolley and FTA's Master Agreement. To ensure compliance, FTA requests that by February 1, 2022, the TDD must provide to FTA a plan to resume transit operations with at least four days of service per week with three vehicles on the Loop Trolley. In addition, the TDD's plan to resume transit operations must assume a resumption of service by June 1, 2022. If FTA does not receive the TDD's plan by February 1, 2022, FTA may exercise its authority under the Master Agreement and the Federal Debt Collection Improvement Act, 31 U.S.C. Chapter 37, to recover Federal funding awarded to the TDD for the Loop Trolley.

If there are any questions, please contact Jason Pollock, Region VII Counsel at (202) 923-6403, [jason.pollock@dot.gov](mailto:jason.pollock@dot.gov).

Sincerely,



Mokhtee Ahmad  
Regional Administrator  
Federal Transit Administration

cc: Mr. Joe Edwards, Board Member, Loop Trolley Transportation Development District  
Dr. Sam Page, County Executive, St. Louis County, Missouri  
Honorable Terry Crow, Mayor, University City, Missouri  
Mr. Taulby Roach, President and CEO, Bi-State Development