

# Memorandum



CITY OF DALLAS

DATE February 7, 2018

TO Honorable Members of the Mobility Solutions, Infrastructure and Sustainability Committee

SUBJECT **High-Speed Rail Update**

On February 12, 2018, you will be briefed on the status of the High-Speed Rail project. The briefing materials are attached for your review.

Please feel free to contact me if you have any questions or concerns.

A handwritten signature in blue ink, appearing to read 'Majed A. Al-Ghafry'.

Majed A. Al-Ghafry  
Assistant City Manager

[Attachment]

c: Honorable Mayor and Members of the City Council  
T.C. Broadnax, City Manager  
Larry Casto, City Attorney  
Craig D. Kinton, City Auditor  
Billerae Johnson, City Secretary (Interim)  
Daniel F. Solis, Administrative Judge  
Kimberly Bizer Tolbert, Chief of Staff to the City Manager  
Jo M. (Jody) Puckett, Assistant City Manager (Interim)

Jon Fortune, Assistant City Manager  
Joey Zapata, Assistant City Manager  
M. Elizabeth Reich, Chief Financial Officer  
Nadia Chandler Hardy, Chief of Community Services  
Raquel Favela, Chief of Economic Development & Neighborhood Services  
Theresa O'Donnell, Chief of Resilience  
Directors and Assistant Directors

# High-Speed Rail Update

**Mobility Solutions,  
Infrastructure and  
Sustainability Committee**

**February 12, 2018**

**Mark Duebner  
Project Manager  
High-Speed Rail**



**City of Dallas**

# Overview

- Update committee on High-Speed Rail (HSR) project
- Review City comments on Draft Environmental Impact Statement (DEIS) for submission to the Federal Railroad Association (FRA)
- DFW Core Express
- Next steps

# Draft Environmental Impact Statement

- Outlines the potential impacts along the HSR alignment
- Currently available for public review and comment through the FRA website
- City representatives attended the Dallas County public hearing on January 29
- City of Dallas comments will be consolidated and submitted prior to the February 20 deadline

# DEIS Comments

- Largely technical in nature concerning conflict with City property and utilities
- The City of Dallas does not disagree with assumptions regarding further improvements that need to be made
- The City does not dispute assumptions regarding congestion mitigation
- The City recognizes more work needs to be done to ensure the rail alignment minimizes impact to Dallas residents
- Comments are included in the appendix

# DFW Core Express

- Developing draft of Interlocal Agreement (ILA)
  - Pending feedback from City of Grand Prairie and City of Arlington on willingness to join the ILA
  - Current Letter of Intent includes requirement for any City joining the ILA to also join DART or the Fort Worth Transportation Authority (the T)
  - The ILA will be brought to City Council for approval
- Dallas, Fort Worth and NCTCOG are finalizing language for the Local Government Corporation (LGC)

# Next Steps

- Submit DEIS comments to the FRA
- Continue drafting DFW Core Express ILA

# High-Speed Rail Update

**Mobility Solutions,  
Infrastructure and  
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**February 12, 2018**

**Mark Duebner  
Project Manager  
High-Speed Rail**



**City of Dallas**



City of Dallas - Department	Comment	DEIS Section and/or Page #
DWU	As per Appendix G, the typical distance from pipe to Viaduct pier is 5 ft. We need a horizontal separation of at least 10 ft. Also, (not shown on this document) we need at least 18 ft. of vertical clearance from ground line to bottom of structure/bridge as per WW Collections.	Appendix G/ Section 1-5
DWU	<p>As per document 1 (DEIS_MAIN TEXT page 3.9-5), there are 15 wastewater mains and 2 water mains 18" diameter and larger within the study area. From research and using the GIS layer provided to us by Freese &amp; Nichols, there are 27 wastewater mains and 5 water mains 18" diameter and larger within the study area.</p> <p>There is a total of 57 ww mains and 29 water mains (6" and larger) within the study area. (Or a total of 30 ww mains and 19 water mains 6" and larger actually crossing the proposed HSR alignment.) See spreadsheet attached for a summary of utilities in conflict.</p>	DEIS_MAIN TEXT/ page 3.9-5
Park and Recreation Department	High Speed Rail will go by several existing or proposed Park and Recreation Facilities, the main issue would be the sound of the passing trains, which may be 4 times per hour, when the train is running at peak capacity. The rail line will be close to Honey Springs Cemetery, the Skyline Trail and J.J. Lemon Park.	General Comment
Planning and Urban Design	<p>a. Proposed street alignments must introduce a walkable grid of streets that integrate into the larger neighborhood, as well as clearly set up the creation of future development sites;</p> <p>b. In our opinion, Belleview Street needs to curve down with the natural fall in the land in order to get down and under the UPRR. It is shown as a straight road to Riverfront, which would be highly difficult or impossible to build from an engineering perspective and still allow for walkable development along Belleview</p>	Appendix D/ Sheet 1 of 536

City of Dallas - Department	Comment	DEIS Section and/or Page #
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Planning and Urban Design	<p>a. Station and circulation plan cannot be evaluated in the absence of a larger urban design vision for the neighborhood. Station proposal should be represented as a “phase one” of a clearly articulated future neighborhood development scenario;</p> <p>b. Any required barriers and fencing must incorporate high quality materials appropriate to the adjacent context;</p> <p>c. Does not integrate station with public space to maximize potential as an iconic destination or to integrate it seamlessly with the surrounding community;</p> <p>d. Opportunity to engage the city with a signature station face that becomes an attraction regardless of transit (think of Denver’s Union Station for example).</p>	Appendix D/ Sheet 1 of 536
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City of Dallas - Department	Comment	DEIS Section and/or Page #
Planning and Urban Design	<p>a. The parking structures and streets preclude any mixed-use development from occurring adjacent to the station;</p> <p>b. The parking structure shown on the Matthew Southwest-owned property south of the UPRR presents a monolithic, impenetrable super-block. Additional streets should be provided through the parking structure to allow for increased pedestrian and vehicular connectivity while also creating better development blocks;</p> <p>c. The proposed streets are designed as highly auto-oriented with turning movement geographies such as free-right turns and the U-turn to the south of the station that will produce an un-walkable pedestrian environment adjacent the station. Intersections should be designed to be as narrow as possible while also ideally meeting as close to ninety-degrees wherever possible to accommodate walkable mixed-use development around the station. Overall, the arrangement of one-way streets and their geometries may support an “airport like” station but do not support a walkable environment;</p> <p>d. The proposed streets are all shown to be very wide (4+ lanes each). They should be designed to be as narrow as possible, with as few lanes as required, while also accommodating wide, comfortable, and safe bike and pedestrian facilities;</p> <p>e. The street adjacent to the Meanders should be a maximum of 2 lanes to allow for quality development adjacent to the water feature.</p>	Appendix D/ Sheet 1 of 536
Planning and Urban Design	<p>a. While the extension of Canton Street to Austin adds connectivity to the station and surrounding area, the configuration shown in the Project Footprint for the Canton/ Lamar intersection favors high-speed vehicular movements and not a balance that also welcomes pedestrians, bikes and meaningful development and open space opportunities.</p>	Appendix D/ Sheet 1 of 536

City of Dallas - Department	Comment	DEIS Section and/or Page #
Planning and Urban Design	<p>a. The provision of pedestrian bridges across the UP Railroad is a positive element. The vertical circulation shown for these pedestrian bridges, especially the one near Canton/ Lamar are less than ideal and should account for iconic placemaking and plaza opportunities adjacent to them;</p> <p>b. Connectivity to the Cedars and future Southside neighborhoods is limited;</p> <p>c. To cross the vast rail infrastructure, pedestrian bridges will need to be integrated with development destinations otherwise they will be sterile, un-safe and un-used.</p>	Appendix D/ Sheet 1 of 536
Planning and Urban Design	<p>Lot E should not just be a parking destination but should be integrated into Downtown as a viable and contributing mixed-use or office district as well.</p>	Appendix D/ Sheet 1 of 536
Planning and Urban Design	<p>The 360 Plan and Perkins + Will development, parking, and block pattern concepts should be better incorporated into the Project Footprint plan for the EIS.</p>	Appendix D/ Sheet 1 of 536
Planning and Urban Design	<p>a. The Cadiz/Lamar intersection is currently a precarious and complicated one that can cause substantial traffic during peak periods due to the seven roads that intersect there. Increased traffic will put even greater strain on this complicated intersection, and it should be included in the scope to help produce a better design outcome concurrently with construction of the station.</p>	Appendix D/ Sheet 1 of 536

City of Dallas - Department	Comment	DEIS Section and/or Page #
Planning and Urban Design	<ul style="list-style-type: none"> <li>a. Station ground floor needs to locate active uses along all street frontages;</li> <li>b. Any required barriers and fencing must incorporate high quality materials appropriate to the adjacent context;</li> <li>c. Does not integrate station with public space to maximize potential as an iconic destination or to integrate it seamlessly with the surrounding community;</li> <li>d. Opportunity to engage the city with a signature station face that becomes an attraction regardless of transit (think of Denver’s Union Station for example).</li> </ul>	Appendix D/ Sheet 1 of 536
Planning and Urban Design	<ul style="list-style-type: none"> <li>a. Austin Street will be substantially impacted by the adjacent parking structure and the traffic that will need to be accommodated. The street should be included as part of the scope and should be planned to be reconstructed as a two-lane street plus on-street parking with adequate pedestrian facilities on each side.</li> </ul>	Appendix D/ Sheet 1 of 536
Planning and Urban Design	<ul style="list-style-type: none"> <li>a. There is no indication for the provision of a multi-purpose trail along the HSR alignment as has been indicated would be done as part of construction of this project.</li> </ul>	Appendix D/ Sheet 1 of 536
Planning and Urban Design	<ul style="list-style-type: none"> <li>a. The rail alignment will cross a number of City-owned street right-of-ways. The ability to add wide, safe and well-lit pedestrian and bike accommodations along these streets should not be negatively impacted by the rail structure.</li> </ul>	Appendix D/ Sheet 1 of 536
Planning and Urban Design	<ul style="list-style-type: none"> <li>a. Seamless connectivity and integration of all transportation modes - DART Light Rail station at convention center, TRE, potential new D2 Light Rail Station(s), Bus stops, bike facilities and walkability should be key components (ability to solve first/last mile without a car).</li> </ul>	Appendix D/ Sheet 1 of 536

City of Dallas - Department	Comment	DEIS Section and/or Page #
Planning and Urban Design	<p>a. Structured parking needs to be designed with ground floor active uses along Austin Street, Belleview Street, and each of the streets facing the station, the meanders at a minimum;</p> <p>b. Structured parking should be constructed in such a manner that it can be re-purposed for other uses in the future as technological advances shift car ownership and driving habits;</p> <p>c. Parking management is critical if the area around the station is to be successful as a “place” and not just a self-serving station;</p> <p>d. Consider “shared” parking solutions.</p>	Appendix D/ Sheet 1 of 536
Transportation	Reference is made indicating there would be no operational impacts during extreme weather. This is followed by a statement that indicates the probability is low. These two statement seem to be in conflict. Please clarify.	ES9.17 on page ES-24
Transportation	Reference is made to impacts to the Honey Springs Cemetery. Please clarify the impacts to families during a funeral or burial service.	ES9.18 on page ES-24
Transportation	Reference is made to USACE owned property. This is likely referring to City owned property within the Trinity River and within the Dallas Flood Control project that is, however, under USACE jurisdiction.	ES.10 on page ES-30
Transportation	Reference is made in the center of the first paragraph about denial by USACE. Please clarify that this only refers to Segment 2 and not also Segment 1.	ES.10 on page ES-30
Transportation	Reference is made to the potential for least tern. Please clarify that no sightings were noted and no nests were found within the project site.	3.6.4.4.2 on page 3.6-41 2nd paragraph
Transportation	Reference is made to several potential threatened species (mussels) within the Trinity River. Please clarify that none were found within the project site.	3.6.4.4.2 on page 3.6-47 and 3.6-48
Transportation	Reference is made to projects under the 408 review process which include "future levees". However, we have recently confirmed that the 408 process is limited to floodway structures that are already built. Therefore future levees and future sumps would not be included here.	3.7.4.1.2 on page 3.7-6 & WW-CM#6 on page 3.7-50

City of Dallas - Department	Comment	DEIS Section and/or Page #
Transportation	Reference is made to 408 review process. In the case of Dallas, we have recently confirmed that the 408 review will be performed by the Fort Worth District only. Review by the Division or by HQ will not be performed.	WW-CM#6 on page 3.7-50
Transportation	NOTE for City Staff: The applicable Compliance measures and Mitigation measures should be included in future City agreements with TCP. These should also be verified during plan reviews	3.6.6.1 on 3.6-67; 3.6.6.2 on 3.6-68; & 3.7.6.1 on 3.7-48; 3.7.6.2 on 3.7-51
Transportation	Please add and consider the City of Dallas Thoroughfare Plan and the City of Dallas CBD and Vehicular Plan and the City of Dallas Complete Streets Manual. These can be found at: <a href="http://dallascityhall.com/departments/transportation/Pages/MobilityPlanning.aspx">http://dallascityhall.com/departments/transportation/Pages/MobilityPlanning.aspx</a>	Table 3.11-1 on 3.11-2
Transportation	Please add and consider these two crossings to Table 3.11-5: Youngblood - Commercial Collector - 4 lanes & Witt - Commercial Collector - 4 lanes	Table 3.11-5 on 3.11-9, 10
Transportation	Please remove the following streets from Table 3.11-7 as these are not designated as bike routes: Cedardale, Illinois, JJ Lemmon, JJ Lemmon, Ledbetter, Pennsylvania, Unnamed SE3, Wheatland, Youngblood, Cleveland, Al Lipscomb, and Grand Avenue Connection.	Table 3.11-7 on 3.11-14, 15
Transportation	Reference is made to constructing dual left turn lanes, right turn lanes, and dual right turn lanes at several intersections near the Dallas HSR Terminal site. The City has recently improved these streets to conform to our complete street standards. Please provide additional clarification on impacts to intersections on Riverfront, Lamar, Commerce, and Cadiz streets.	Table 3.11-39 on 3.11-38

City of Dallas - Department	Comment	DEIS Section and/or Page #
Trinity Watershed Management	Figure 2/Figure 2-26 - While the discussion provides a good introduction to the Location Corridor Analyses process, and subsequent project segments used to develop the Build Alternatives, the following discussions relate to "Alternatives A through F"; it would be helpful to provide a map in the Executive Summary that shows the Build Alternatives as discussed in the DEIS. Additionally, if Alternative A is the preferred Alternative, then Figure 2-27 should also be included in the Executive Summary	ES.6; ES-6
Trinity Watershed Management	Air Quality - the discussion as presented may not reflect a complete analyses. The discussion references off-site power generation such that there would be no impacts, but does not provide related location information to allow assessment of that input. One may expect both discussions of relative traffic impacts/ air quality of the vehicles driving to each of the stations; additionally, I would expect some degree of mixing from the HSR operation. Neither is discussed in the Executive Summary. Additionally, it may not be appropriate to reference expected Nox VOC and CO emissions to be reduced over time because of anticipated improvements to car emissions between 2024 and 2040.	ES.9.3; ES-9
Trinity Watershed Management	Water Quality - It may be helpful to expand this section to identify existing water quality impairments within the "9 watersheds" that the project alternatives cross. It would be helpful to identify the nine affected watersheds. Some but not all water quality impairments (Total maximum daily loads (TMDLs), have defined best management practices set forth in formal Implementation Plan(s), approved by the TCEQ that would be required to be incorporated into this project to reduce/ mitigate potential impacts. Additionally, most discussion of water quality impairment is provided relative to anticipated pollutant loading, rather than in lineal feet of channel impacted. It should be noted that some, but not all TMDLs have to potential to be impacted by this project. As is - it is very difficult to identify whether one alignment/alternative has or doesn't have impacts/benefits over the others, relative to water quality.	ES.9.4; ES-10
Trinity Watershed Management	Water Quality - It may be helpful to expand this section to identify numbers of impacted groundwater wells per alternative.	ES.9.4; ES-10



City of Dallas - Department	Comment	DEIS Section and/or Page #
Trinity Watershed Management	Water Quality - this mentions retention basins, however, there is no information on where they may be used, or a summary of this type of feature associated with each build alternative	ES.9.4; ES-10
Trinity Watershed Management	Table 2 - is not referenced in the text, and contains information requested in the above comments; All tables/graphics should be appropriately referenced in the text. I would note that the table references Impaired Water bodies by the 303(d) list - however, there is no summary discussion provided for context to what these data mean.	ES.9.4; ES-10
Trinity Watershed Management	Noise and Vibration - Table 3: needs to be referenced, and context for what is "moderate" and what is a "severe" impact needs to be added	ES.9.5; ES-11
Trinity Watershed Management	Hazardous Materials and Solid Waste: for local planning purposes, an estimate of increased waste management requirements for terminals and rail maintenance facilities may be helpful to the local governments/waste management entities. While the document indicates the Build Alternatives are "not expected to exceed capacity of existing landfills", landfill capacity versus anticipated waste generation is a concern, and many cities are pushing towards "zero waste policies". This should be discussed for both construction related demolition and debris removal, as well as future operations.	ES 9.6; ES-12
Trinity Watershed Management	Natural Ecological Systems and Protected Species - This discussion indicates that 'the terminal options in Dallas and Harris County would not impact protected species habitat due to their developed urban environments'. That said; the Dallas station location is adjacent to a sump area, and constructed wetlands that provide potential habitat to several Protected Species that may have been omitted from these analyses	ES 9.7; ES-13

City of Dallas - Department	Comment	DEIS Section and/or Page #
Trinity Watershed Management	Table 4 lists only three protected species, none of which occur in Dallas County. A review of the Final EIS for the Dallas Floodway adjacent to the proposed station location and northern segment indicates 17 species (not including plants); The Texas Parks and Wildlife searchable database includes 34 Federal and state species listed in Dallas County alone. ( <a href="https://tpwd.texas.gov/gis/rtest/">https://tpwd.texas.gov/gis/rtest/</a> ). This section needs to be appropriately updated. One of the critical elements that we have had to address in project implementation near Waters of the State is appropriate identification, and mitigation of impacts to freshwater mussel species. I would also note that this summary is not consistent with the information provided in Section 3.6.4.4.2	ES 9.7; ES-13
Trinity Watershed Management	Waters of the United States: There is no mention of the project impacts to the Upper and Lower Chain of Wetlands; while these are man-made wetlands; they are part of a Federal project and were designed to mitigate other project impacts, as well as to provide flood storage and habitat functions .	ES 9.8; ES-14
Trinity Watershed Management	Waters of the United States: There is no mention of the project impacts relative to hydrologic and hydraulic analyses, and the need for local permitting (CDC) because of the Trinity River ROD; impacts to valley storage and flood elevations need to be discussed; please also add an explanation of why the permanent impacts are greater then the temporary impacts - this is counter intuitive.	ES 9.8/9.9; ES-14,15
Trinity Watershed Management	There is no discussion of potential impacts to public utilities; The work around the Central Wastewater Treatment Facility, and local lines in that area, as well as the Station Zone need to be discussed	ES 9.10; ES-17

City of Dallas - Department	Comment	DEIS Section and/or Page #
Trinity Watershed Management	Utilities and Energy: we note significant power requirements for facility operation (anticipated to be > 25% of future statewide energy expansion); we offer concerns relative to this increase in an area that has an existing significant potential hourly peak load associated with major infrastructure (water/wastewater and stormwater) pump stations in the same portion of the grid in Dallas. Impacts to the existing grid/power users should be quantified, particularly in/near the terminal stations. In addition, we encourage coordination with major local users concerning future power demands to ensure optimal system function	ES 9.10; ES-17
Trinity Watershed Management	Table 9 includes information on impacted oil and gas wells - ; there is no reference to this table in the text, and there is no discussion of this potential impact in the discussion provided.	ES 9.10; ES-16
Trinity Watershed Management	Table 10 - The table references landscape units - it would be helpful to have a map of where these units may be located; additionally, this table is not referenced in the text.	ES 9.11; ES-18
Trinity Watershed Management	May be helpful to provide results of Station-Zone Analyses here.	ES 9.12; ES-19
Trinity Watershed Management	Development of jobs data relative to numbers of jobs, rather than a global "fractional increase of one-half percent of existing employment base" may be more helpful in understanding potential positive impacts of the project. This may be helpful to offsetting potential Environmental Justice implications associated with impacts to LeForge and LeMay neighborhoods, Wilmer Hutchins High School, churches and historic cemeteries	ES 9.15; ES-22
Trinity Watershed Management	Table 14: please add a key to what the scores shown for Community cohesion, Children's Health and Safety, and Community Facilities mean. Also - there is a single, and a triple asterisk used, without any clarifying information.	ES 9.15; ES-23
Trinity Watershed Management	Electromagnetic Fields: this discussion reflects analyses of no impacts to riders, but does not discuss potential impacts of electromagnetism to stationary receptors along the route. This may reflect a greater exposure scenario.	ES 9.16; ES-23

City of Dallas - Department	Comment	DEIS Section and/or Page #
Trinity Watershed Management	<p>Environmental Justice: The discussion as provided indicates that the Location of Disturbance (LOD) potentially impacts 68 of 132 (52%) of identified EJ block groups; there is a discussion of temporary construction zones that impacts 29 percent of temporary construction zones, and 24 percent of total acreage of temporary construction areas. There is no similar discussion of permanent impacts. With the other impact tables indicating a much larger area of permanent than temporary impacts, the discussion of permanent impacts to environmental justice concerns needs to be included, particularly in light of other identified community, school and historic cemetery impacts in these same areas. When over 1/2 of the identified EJ blocks are potentially impacted by the project, the statement indicating "impacts would not affect EJ communities in a disproportionately high and adverse manner" may not reflect local concerns.</p>	ES 9.19; ES-25
Trinity Watershed Management	<p>Section 4(f)/ Section 6(f): We are concerned about the finding of no Adverse Impacts to the Dallas Floodway Historic District, because the proposed mitigation would render the impacts to be found to be a de minimis impact. However, there is no discussion of what those impacts or mitigation measures might be. This text also indicates that the Texas Historic Commission must concur with the finding concerning the effects of the Build Alternatives on the Dallas Floodway Historic District. I would note that as the Operator of the Dallas Floodway, the City would also need to concur with these findings. We note that the Trinity River Greenbelt is located outside of the LOD, and therefore there were no associated Section 6(f) property conversion identified.</p>	ES 9.23; ES-30
Trinity Watershed Management	<p>FRA's Preferred Alternative: First sentence needs to be clarified: the USACE does not own the property in Dallas County; the City of Dallas owns the property for the Dallas Floodway and Dallas Floodway Extension; the USACE has worked as a partner with the City of Dallas to construct a federally-owned project along the Dallas Floodway and Floodway extension. A Section 408 authorization is required from the USACE for this part of the project because there are potential impacts to a Federal Project.</p>	ES 10; ES-30

City of Dallas - Department	Comment	DEIS Section and/or Page #
Trinity Watershed Management	Table 18 needs to provide a complete summary of impacts for each of the build alternatives	ES 10; ES-30,32
Trinity Watershed Management	The Initial Alternatives discussion may need a mention of common alignments such as Dallas/Grimes/Walker County alignment, and NW Houston(black lines)	2.5.1 on page 2-21
Trinity Watershed Management	Was Threatened and Endangered Species included in the Level II screening? If so, please add it to this table.	2.5.1.2 on 2-25
Trinity Watershed Management	Figure 2-19: Please explain the significance of the small intersection areas shown as part of the Dallas Terminal that are located away from the main station location shown on the map	2.5.2.1/2.5.2.2 on 2-27 - 2-29
Trinity Watershed Management	It should be noted that the Trinity Parkway is no longer a project that requires consideration for the High Speed Rail Project. The project was cancelled by the Dallas City Council in August 2017.	2.5.4 on 2-41
Trinity Watershed Management	The discussion on regulatory authority needs to include that under Clean Water Act Section 402, local responsibility and authority for compliance may be delegated through appropriate an TPDES Permit to a local Municipal Separate Storm Sewer System (MS4) operator such as the City of Dallas. Also construction sites that disturb less than an acre also need to be permitted if they are located within 1/4 mile of other construction work; this situation is called a common plan of development. The MS4 discussion is provided under a separate discussion, however, the local authority is delegated out of the Clean Water Act, and Texas Water Code	3.3.2 on 3.3-1 - 3.3-4
Trinity Watershed Management	Table 3.3-4 This table looks low with respect to number of wells within study area, particularly considering numbers of private wells.	3.3.4.2.1 on 3.3-16
Trinity Watershed Management	MSDs: I would note that the potential Environmental Risks associated with MSDs were not included in the summary Section on Hazardous Materials and Solid Waste within the Executive Summary	3.3.4.2.3 on 3.3-17

City of Dallas - Department	Comment	DEIS Section and/or Page #
Trinity Watershed Management	<p>The text indicates that "because of the potential discharge of pollutants to surface water, a TPDES Permit, issued by the TCEQ would be required to comply with Clean Water Act Section 402". Because of the length of this project, and the multiple adjacent jurisdictions with separate MS4 Permit compliance responsibilities for inspecting TPDES TXR15000 Construction General Permitted projects under CWA Section 402, it is anticipated that the TCEQ may issue an Individual Permit, or depending on the project scheduling may permit the project as a phased project disturbance under the TPDES Construction General Permit. We suggest appropriate clarification from the state as to how they anticipate handling this project. Should it be under the TXR15000, it would be helpful to address how subsequent permit compliance would need to be coordinated among these jurisdictions. It would be helpful to address how that coordination for inspections, SWPPP reviews and compliance enforcement is anticipated to occur. This discussion should be clarified to reflect that copies of the permit coverage, Large Site Construction Notice and Notice of Intent, and SWPPP are to be provided to the local affected MS4(s) in addition to the TCEQ prior to initiating construction.</p>	3.3.5.1/3.3.6.1/3.3.6.2
Trinity Watershed Management	<p>The text indicates that "because of the potential discharge of pollutants to surface water, a TPDES Permit, issued by the TCEQ would be required to comply with Clean Water Act Section 402". Additionally, the constructed facilities, that is both the line, as a linear transportation feature permitted under the MS4 Program, and the maintenance facilities, may require permanent facility permitting under the Multi-Sector General Permit for Industrial SIP Codes.</p>	3.3.5.1/3.3.6.1/3.3.6.2
Trinity Watershed Management	<p>It should be noted that more-frequent inspections may occur to address any non-conforming site conditions until the site is in compliance with the SWPPP and applicable permit requirements.</p>	3.3.6.1 on 3.3-29
Trinity Watershed Management	<p>The SWPPP is required to identify all potential sources of pollution, including chemical handling and storage, and petroleum handling and storage. There are no mitigation measures identified to address this portion of the surface water quality mitigation measures.</p>	3.3.6.2 on 3.3-29

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Trinity Watershed Management	Table 3.3.9 includes a line item for Reservoir/Dam Crossings, where there are no impacts, but does not include impacts to the Dallas levee system, where there are impacts.	3.3.7 on 3.3-31
Trinity Watershed Management	Please include a reference to the appropriate Dallas Noise Ordinance	3.4.2 on 3.4-4
Trinity Watershed Management	It would be helpful to get a summary of the estimated waste produced to compare with affected landfill capacity. The text in Section 3.5.3.2 references that this estimate was made, however, the bottom line number is not provided in the main text, or the executive summary. Table 3.5-3 provides a summary of existing landfill capacity, and an estimate of waste accepted in 2014 - however, this does not provide a meaningful understanding of waste-related impacts that one would get from a comparison of anticipated waste generated versus existing landfill capacity. Although there are estimates in Section Table 3.5.6, it would be helpful to compare waste generated with local capacity	3.5.3.2/3.5.4.2
Trinity Watershed Management	The text indicates that based upon a 4-year schedule, that the waste generated per year is less than 1 percent of the 2014 Average Annual waste disposal rate. The challenge to this assumption is that typically, the demolition is done all at once early in the project schedule, rather than spread out over the life of the project.	3.5.6 on 3.5-61
Trinity Watershed Management	Operational Impacts re: Hazardous Materials: I would note that the HSR maintenance facilities would likely be required to permit under the TPDES Multi-Sector General Permit (Industrial) and would need a Site-specific SWPPP and Spill Prevention Control and Counter Measure Plan.	3.5.5.2.2 on 3.5-62
Trinity Watershed Management	HM-MM#2 Hazardous Materials Management/HM-MM#3 Previously Unidentified Hazardous Materials Plan/HM-MM#4: Waste Management: We concur with these measures, but want to clarify that these documents should be appended to the Project SWPPP.	3.5.5.2 on 3.5-63
Trinity Watershed Management	The statements under the paragraph labelled Texas Administrative Code may not be correct, relative to no Texas Codes requiring protection of State-listed species. We have had to perform Aquatic Relocation Efforts under a State-approved Aquatic Relocation Plan, and certified biologists relative to State-listed species. Please clarify.	3.6.2 on 3.6-4

City of Dallas - Department	Comment	DEIS Section and/or Page #
Trinity Watershed Management	There are some concerns relative to the evaluation performed for the impacts to Natural Ecological Systems and Protected species. We have TSE lists from other programmatic EIS efforts on the LOD, and from the referenced TWDB database for Dallas County that show 15-35 potential affected species; none of which were included in the summary analyses for this project. While these species are detailed later in the section, they have been omitted in the overall analyses. The last sentence of the last paragraph on the page indicates "these results, based on the stated limitations of the TXNDD, do not mean that there is an absence of other endangered, threatened, or rare species and should not be used for presence/absence determinations." However, this is precisely what has been done.	3.6.3 on 3.6-5
Trinity Watershed Management	The information presented in this section concerning impacts to Federal and Texas' protected species, and habitat impacts has not been completely/accurately summarized in the Executive Summary.	3.6.4.4
Trinity Watershed Management	The statement at the end of this segment indicates that because Dallas, Ellis, Navarro and Limestone counties do not have potential habitat mapped within the study boundaries, the acreage of impacts to federally listed species is zero. This may or may not be true. It may be more accurate to indicate that it is not possible to quantify this ratio.	3.6.5.2.3 on 3.6-64
Trinity Watershed Management	Table 3.6-21: Texas Parks and Wildlife Department study is ongoing through 2019	3.6.5.2.3
Trinity Watershed Management	NR-MM3: Aquatic Relocation efforts need to be Texas Parks and Wildlife approved.	3.6.6.2
Trinity Watershed Management	Regarding section 401 of the Clean Water Act, please clarify which tier applies to project	3.7.2 on 3.7-1
Trinity Watershed Management	Please add a reference to Texas Parks and Wildlife Code, Chapter 90 relative to access to freshwater areas, as it applies to work within waters of the State	3.7.2 on 3.7-2
Trinity Watershed Management	The definition of floodplain may not be consistent with current federal regulations	3.7.3 on 3.7-3



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Trinity Watershed Management	Definition used for wetlands makes no reference to hydric soils, which are critical to the federal wetlands classification	3.7.3 on 3.7-5
Trinity Watershed Management	The headwaters of the Trinity River are located in North Texas, about three miles south of the Texas-Oklahoma border, rather than as defined in the DEI indicating that the basin starts "northwest of Dallas at the confluence of the Elm and West Forks of the Trinity River". This would be the start of the main Stem of the Trinity River. This mis-definition is used in several places in this document.	3.7.4.1.1/3.8.4.3.2
Trinity Watershed Management	The list of notable streams does not include notable streams such as White Rock Creek, Five Mile Creek, Prairie Creek.	3.7.4.1.1 on 3.7-6
Trinity Watershed Management	Clarification on the information below table 3.7-3 specifically regarding the acreage of the Study Area in the floodplain	3.7.4.1.1 on 3.7-6
Trinity Watershed Management	The definition of the USACE projects in the Dallas area is very convoluted.	3.7.4.1.2 on 3.7-6
Trinity Watershed Management	The concern relative to hydric soils relates to wetlands delineation; this is not addressed in either the wetlands, nor the hydric soils discussion	3.7.4.1.3 on 3.7-6
Trinity Watershed Management	Notation on the "width of the crossing is more than 140 feet, the minimum number of piers required to support the viaduct crossing would be placed within the feature." We note that this statement may not be consistent with the supporting engineering drawings that show a much tighter pier spacing	3.7.6 on 3.7-48
Trinity Watershed Management	Regulatory Context: this section references the HUD floodplain maps; it should be noted the FEMA floodplain mapping are used for regulatory purposes in Dallas County	3.8.2 on 3.8-1
Trinity Watershed Management	Note that Executive Order 13690 was pulled by subsequent Executive Order in 2017	3.8.2 on 3.8.3
Trinity Watershed Management	Table 3.8-2: Please correct the reference for the Dallas Floodplain Regulator: It should be the City of Dallas - Trinity Watershed Management Department	3.8.2 on 3.8-6

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Trinity Watershed Management	Table 3.8-2: The Table references the Trinity River Corridor Development Certificate under Dallas; it should be noted that this is a regional program coordinated by the North Central Texas Council of Governments and the USACE	3.8.2 on 3.8-6
Trinity Watershed Management	The description of Dallas Flood policy is not correct; Additionally, it is the NCTCOG that coordinates the Trinity River CDC process	3.8.2 on 3.8-6
Trinity Watershed Management	There is no discussion provided concerning the City of Dallas "no-rise" policy concerning post-project water surface elevations; additionally, there are similar requirements relative to impacts to valley storage; these two elements are as important or more so than the discussion of finish floor elevation that was provided.	3.8.2 on 3.8.6
Trinity Watershed Management	Table 3.8-3 - It should be noted the City of Dallas Drainage Criteria Manual is currently under revision; the information provided will likely change prior to project implementation	3.8.2 on 3.8.7
Trinity Watershed Management	Maintenance agreements concerning local retention basins may be required, if the adjacent jurisdiction is to provide such maintenance; the party responsible for this maintenance needs to be defined	3.8.5.2.3 on 3.8-27
Trinity Watershed Management	And Table 3.8-9: There is a statement that "Segments 1, 2A and 2B are not included in Table 3.8-9 because the soils in this portion of the floodplain study area are not highly erosive." This is not true for Segment 1, and adequate provisions for scour and erosion protection should be included into the project planning	3.8.5.2.4 on 3.8-27
Trinity Watershed Management	Tables 3.9-1 and 3.8-11 are not consistent with respect to numbers of impacted utilities; additionally, the discussion of mitigative measures addresses electrical, water and wastewater utilities; there are several large diameter storm sewers potentially impacted by the project that will also need to be mitigated as a part of the design.	3.9.4
Trinity Watershed Management	EU-CM#1 the development Impact report needs to also address impacted drainage infrastructure	3.9.6.1
Trinity Watershed Management	EU-MM#2 the mitigation efforts may also need to address impacted drainage infrastructure	3.9.6.2

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Trinity Watershed Management	EU-MM#+E63:E725: Electric Utility Provider Coordination: We concur with this mitigative measure; we have concerns about existing loads to the grid in the vicinity of the Dallas Station Location	3.9.6.2