Section 4(f) Finding
Good-Latimer Tunnel in Dallas, Texas and
Fair Park in Dallas Texas
Dallas Area Rapid Transit (DART) Southeast Corridor
Light Rail Project

The Dallas Area Rapid Transit Authority (DART) in consultation with the Federal Transit Administration (FTA) is proposing construction of the Southeast Corridor Light Rail Transit Project (the Project) in Dallas, Texas. FTA has determined that said construction will have an effect upon the Good-Latimer Tunnel and a portion of Fair Park, as hereinafter described, which are two properties that are included in or have been determined to be eligible for inclusion in the National Register of Historic Places and subject to the requirements of Section 4(f) of the Department of Transportation Act of 1966.

The Project will directly use approximately 0.84 acres of Fair Park for station area and adjacent trackage.

The Good-Latimer Tunnel, which is between Swiss Avenue and Elm Street, passes under Gaston Avenue and the former Texas & Pacific Railway. The tunnel structure would be razed and the area filled in to bring the roadway and the LRT alignment to the same level as the surrounding roadways and properties.

The Federal Transit Administration has consulted with the State Historic Preservation Officer, the Advisory Council on Historic Preservation and the United States Department of the Interior. Based on this consultation and the "Southeast Corridor Section 4(f) Statement", prepared as Appendix E to the Southeast Corridor Environmental Impact Statement, the Federal Transit Administration has determined that there is no feasible and prudent alternative to the use of the land from Fair Park and the Good-Latimer Tunnel and that the proposed action includes all possible planning to minimize impacts resulting from such use.

By:  
Robert C. Patrick  
Regional Administrator

Date: 9/25/03
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Attachment E3  Correspondence
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Section 4(f) Report
Federal Transit Administration and Dallas Area Rapid Transit (DART)

E1.0 INTRODUCTION
Section 4(f) of the Department of Transportation Act of 1966 (49 USC 1653, now 49 USC 303) declares a national policy that special effort be made to preserve the natural beauty of the countryside, including public park and recreation lands, wildlife and waterfowl refuges, and historic sites. This report documents the assessment of potential Section 4(f) properties along the planned route of DART’s Southeast Corridor project. It identifies those properties that were found not to be subject to Section 4(f) use and the property where a Section 4(f) use is necessary. For this property, documentation of the planning efforts and coordination activities is provided that demonstrates that use of the property is justified, necessary, and meets the requirements of the Section 4(f) legislation.

E2.0 PROJECT DESCRIPTION
DART proposes to build a light rail transit (LRT) line from downtown Dallas to Buckner Boulevard in the southeast portion of Dallas County as shown in Figure E.1. The study area for the project is generally bounded by Interstate Highway (IH) 30 on the north, IH 635/IH 20 on the east and south, and IH 45 on the west. The study corridor also includes the Good-Latimer/Deep Ellum/Baylor area north of IH 30. As a result of completing a Major Investment Study (MIS) for the area and subsequent Preliminary Engineering/Environmental Impact Statement (PE/EIS), a Build Alternative (LRT) alignment has been developed, as follows.

Alignment and Stations: The alignment of the proposed LRT would begin in downtown Dallas at the existing Pearl Street Station. It would extend northeastward along Bryan Street, passing under the North Central Expressway to the Good-Latimer Expressway (Good-Latimer), where the alignment would turn to the southeast and be within the median of Good-Latimer Expressway. This requires razing the existing tunnel and bringing Good-Latimer back to the same level as the surrounding streets and properties. A proposed station would be located near Good-Latimer and Swiss Avenue. The alignment would turn northeastward near Monument Street onto the former Union Pacific Railroad (UP RR) right-of-way (now owned by DART). The rail right-of-way lies north of and parallel to Indiana Avenue. A station to serve the
Baylor Health Care System (HCS) and Deep Ellum areas would be located on the railroad right-of-way in the block bounded by Walton, Indiana, Malcolm X, and Junius Streets. The alignment would continue northeastward along the rail right-of-way, then turn to the east and southeast after passing Hall Street. The alignment would cross under IH 30. Just before intersecting with Parry Avenue, the alignment would swing north, off the rail alignment, before curving south to the east side of Parry Avenue. A station would be built on the east side of Parry Avenue at the entrance to Fair Park. The alignment would then continue on the east side of Parry, along the edge of Fair Park, past the Music Hall, before crossing Parry Avenue/R.B. Cullum Boulevard. It would continue southward across current residential properties to connect to the former Southern Pacific Railroad (SP RR) right-of-way (now owned by DART). This segment of rail line would extend southeast parallel to Trunk Avenue. A transit center/station would be built at the intersection of the rail alignment with Martin Luther King, Jr. Boulevard (MLK). The alignment would continue southeast, then turn east along the railroad right-of-way south of Scyene Road. Stations would be built near Hatcher Street and Lawnview Avenue. East of Lawnview, the LRT alignment uses the existing rail right-of-way which turns southward, passing through Gateway Park/Grover C. Keeton Golf Course north of Bruton Road. South of Bruton Road, the alignment would pass by the east end of Devon-Anderson Park. A station would be built at the transit center on the south side of Lake June Road. At Lake June Road, the alignment would turn southeast along the railroad right-of-way, which is parallel to and north of US 175 (C.F. Hawn Freeway). The alignment would continue southeast to its terminal station between Elam Road and Buckner Boulevard (Loop 12).

The physical aspects of the proposed LRT system are defined by two features: the alignment and the stations. The proposed route and alignment for the LRT guideway would include the tracks, trackbed, overhead electric system (or catenary), and ancillary equipment. LRT vehicles would operate on two-track, two-way continuously welded steel rails. The proposed LRT system would be similar to current DART operations for a double track line. Service would be provided between 5 a.m. and midnight, with the non-service hours reserved for maintenance. An unrelated feature includes the existing freight rail line on which service must be maintained and the operation of which will not affect LRT operations. From the UP RR mainline, just east of Hatcher Road, three tracks will be provided – two for LRT and one for freight. The right-of-way in the area is generally a 100-feet wide with the existing track located in the center of the right-
of-way. Some portions of the freight track will be relocated within the existing right-of-way, particularly along Scyene Road and through Grover Keeton Park.

Station platforms would be at-grade with 300-foot, low-level platforms, which could be extended to 400 feet in the future. Weather protection for patrons would be provided by canopies covering the width of the platform for a minimum of one-third of the platform’s length. The stations typically would include amenities such as bench seating, windscreens, trash receptacles, newspaper racks, and artwork. All platforms and LRT vehicles would be accessible to elderly and physically challenged patrons during all hours of operation. DART currently uses a combination of low and high platforms at its stations. Typical boarding is done from the low platform, approximately 8 inches above top-of-rail, with special use boarding taking place from high-block platforms.

E3.0 GUIDING LEGISLATION, RULES AND POLICY

E3.1 Department of Transportation Act of 1966 (49 U.S.C. 303)
Projects using U.S. Department of Transportation funds or requiring a license from its agencies must meet the requirements of Section 4(f) of the Department of Transportation Act of 1966 (49 USC 303). Section 4(f) declares it a national policy to make a special effort to preserve the natural beauty of the countryside, including parks and recreation land, wildlife and waterfowl refuges, and historic sites. Section 4(f) prohibits the Secretary of Transportation from approving projects that require the use of significant publicly owned parks, recreation areas, or wildlife and waterfowl refuges, or any significant historic site protected under Section 4(f) unless a determination is made that:

(1) There is no feasible and prudent alternative to such use, and
(2) The project includes all possible planning to minimize harm to the property resulting from such use.

When such resources are affected, the documentation of no feasible or prudent alternative and planning to minimize harm is included in the federal environmental document. A Section 4(f) “use” occurs:
(1) When land is permanently incorporated into a transportation facility;
(2) When there is a temporary occupancy of land that is adverse in terms of the statute’s preservationist purposes as determined by the [length of occupancy, scope of work, anticipated permanent adverse physical impact of the occupancy of land, and possibility of restoration to the resource’s original condition prior to occupancy]; or
(3) When there is a constructive use of land. (23 CFR 771.135 [p])

Permanent Acquisition: The physical and permanent procurement of a protected resource for use by a transportation project is known as an actual or direct use.

Temporary Use: Short-term, temporary use (e.g., for a construction easement) of a Section 4(f) resource would not constitute a use under Section 4(f) as long as the following conditions are met: occupancy of the resource is temporary (i.e., shorter than the construction period for the entire project) and there is no change in ownership; changes or effects to the resource are minimal; there are no permanent adverse impacts resulting from the temporary use; and there is a documented agreement between relevant jurisdictions regarding temporary use of the resource.

Constructive Use: A constructive use occurs when a project does not incorporate land from a protected resource but when the project generates impacts due to proximity (e.g., noise or visual impacts) and these impacts are so severe that they impair preservation or utilization of the protected resource. Constructive use occurs when the project negatively affects the purposes for which the resource is of value to the public (i.e., its activities, features, or attributes). In other words, a constructive use determination considers the present use of the resource by the public as well as the attributes that made the resource valuable in the first place. Constructive use resulting from increased noise applies only when the protected resource is “noise sensitive” and derives some of its value and use from its relatively quiet setting. To constitute a constructive use, the noise increase must not only be detectable to the human ear (i.e., greater than 2 to 3 dBA) and exceed the Federal Transit Administration (FTA) abatement criteria, but it must be severe enough to impair enjoyment of the Section 4(f) resource. Constructive use based on visual intrusion occurs when there is substantial
impairment to the features, setting, or attributes of a protected resource when those features, setting, or attributes are important contributing elements to the value of the resource.

E3.2  Department of Transportation Environmental Impact and Related Procedures, Final Rule, Section 771.135 (f)

A determination of whether a resource is used under Section 4(f) is also subject to consideration of 23 CFR § 771.135(f) of the Department of Transportation guidelines for preparation of environmental documents. This section states that certain properties are excluded from 4(f) evaluation because they are already in use for transportation purposes; the project contemplates the restoration, rehabilitation, or maintenance of these properties; and the project will not adversely affect the historic qualities of these properties. Section 771.135(f) states:

“The Administration may determine that Section 4(f) requirements do not apply to restoration, rehabilitation, or maintenance of transportation facilities that are on or eligible for the National Register, when:

such work would not adversely affect the historic qualities of the facility that caused it to be on or eligible for the National Register, and the SHPO and the Advisory Council on Historic Preservation (ACHP) have been consulted and have not objected to the Administration finding in paragraph (f)(1) of this section.”

E3.3  Department of Transportation Section 4(f) Policy Paper

The US Department of Transportation (DOT), via the Federal Highway Administration (FHWA), issued its Section 4(f) Policy Paper in 1987 (revised in 1989) to “provide guidance on the applicability of Section 4(f) to various types of land.” As a DOT agency, and absent of its own specific policy statement, FTA projects are also subject to this policy guidance. The policy addresses 22 land uses and related issues, as reflected in the following list:

1. Use of Land
2. Public Parks, Recreation Areas, and Wildlife and Waterfowl Refuges
3. Historic Sites
4. Historic Bridges and Highways
5. Archeological Resources
6. Public Multiple-use Land Holdings
7. Late Designation
8. Wild and Scenic Rivers
9. Fairgrounds
10. School Playgrounds
11. Bodies of Water
12. Trails
13. Bikeways
14. Joint Development (Park with Highway Corridor)
15. "Planned" Facilities
16. Temporary Occupancy of Highway Right-of-Way
17. Tunneling
18. Wildlife Management Areas
19. Air Rights
20. Access Ramps (in accord with Section 147)
21. Scenic Byways
22. Temporary Construction Easements

E3.4 Land and Water Conservation Fund Act (Public Law 88-578)
Section 6(f) of the Land and Water Conservation Fund Act (Public Law 88-578) requires that recreation land acquired or developed with assistance under this section remain in use exclusively for public outdoor recreation. It may not be converted to other uses without the approval of the National Park Service.

E3.5 Texas Parks and Wildlife Code
Chapter 26 of the Texas Parks and Wildlife Code was established to protect parks, recreation and scientific areas, wildlife refuges, and historic sites from being used or taken by state or local agencies for public projects. Chapter 26 applies to all DART rail projects. Section 26.001 of Chapter 26 provides that:

(a) An agency of this state may not approve any program or project that requires the use or taking of any public land designated and used prior to the arrangement of the program or project as a park, recreation area, scientific area, wildlife refuge, or
historic site, unless the [agency], acting through its duly authorized governing body or officer, determines that:

(1) There is no feasible and prudent alternative to the use or taking of such land; and

(2) The project includes all reasonable planning to minimize harm to the land, as a park, recreation area, scientific area, wildlife refuge, or historic site, resulting from the use or taking.

Chapter 26 is similar to Section 4(f) of the Department of Transportation Act of 1966 in its requirements, except that the Texas law requires a public hearing on any taking of public parkland. Section 26.001 states that:

(b) A finding required by Subsection (a) of this section may be made only after notice and a hearing as required by this chapter.

(c) The governing body or officer shall consider clearly enunciated local preferences, and the provisions of this chapter do not constitute a mandatory prohibition against the use of the area if the findings are made that justify the approval of a program or project.

Chapter 26 excludes parks, recreation areas, or wildlife refuges in certain cases. Section 26.004 provides that a department, agency, board, or political subdivision having control of the public land is not required to comply with this chapter if:

(1) The land is originally obtained and designated for another public use and is temporarily used as a park, recreation area, or wildlife refuge pending its use for the originally designated purpose;

(2) The program or project that requires the use or taking of the land being used temporarily as a park, recreation area, or wildlife refuge is the same program or project for which the land was originally obtained and designated; and

(3) The land has not been designated by the department, agency, political subdivision, county, or municipality for use as a park, recreation area, or wildlife refuge before September 1, 1975.
E3.6 Antiquities Code of Texas

The Antiquities Code of Texas (Texas Natural Resources Code of 1977, Title 9, Heritage, Chapter 191) establishes the Texas Historical Commission (THC) as the legal custodian of all cultural resources, historic and prehistoric, within the public domain of the State of Texas (§191.051). The authority of the THC extends to designation and protection of State Archeological Landmarks, which can be historic buildings and structures, shipwrecks, or archeological sites.

Section 191.092(a) of the Antiquities Code states that State Archeological Landmarks include:

Sites, objects, buildings, artifacts, implements, and locations of historical, archeological, scientific, or educational interest, ...as well as archeological sites of every character that are located in, on, or under the surface of any land belonging to the State of Texas or to any county, city, or political subdivision of the state are state archeological landmarks and are eligible for designation.

The law contends that a structure or building has historical interest if it:

(1) Was the site of an event that has significance in the history of the United States or the State of Texas;
(2) Was significantly associated with the life of a famous person;
(3) Was significantly associated with an event that symbolizes an important principle or ideal;
(4) Represents a distinctive architectural type and has value as an example of a period, style, or construction technique; or
(5) Is important as part of the heritage of a religious organization, ethnic group, or local society. [§191.092(b)]

Part II of Title 13 of the Texas Administrative Code includes a chapter governing the practice and procedure of the THC (13 TAC 26). Section 26.7 of this chapter states that a historic structure can be designated a state archeological landmark if it: (1) is publicly or privately owned and listed in the National Register of Historic Places (NRHP); and (2) meets one of the six eligibility criteria listed below.
Appendix E
Section 4(f) Evaluation

(A) Is associated with events that have made a significant contribution to the broad patterns of our history;
(B) Is associated with the lives of persons significant in our past;
(C) Is important to a particular cultural or ethnic group;
(D) Is the work of a significant architect, master builder, or craftsman;
(E) Embodies the distinctive characteristics of a type, period, or method of construction, possesses high aesthetic value, or represents a significant and distinguishable entity whose components may lack individual distinctions; or
(F) Has yielded or may be likely to yield information important to the understanding of Texas culture or history.

Owner consent for designation of publicly owned properties is not required. Once a resource is considered a State Archeological Landmark, it may not be removed, altered, damaged, or destroyed without a contract or a permit issued for that purpose by the THC. Once this permit is issued, the THC will grant, at maximum, a one time extension beyond the original time frame for the required investigations.

E4.0 STATUS OF PROJECT DEVELOPMENT

E4.1 Selection of the Light Rail Alternative for PE/EIS
FTA and DART completed an MIS for the Southeast Corridor in May 2000. The MIS evaluated potential alternatives and alignments, presenting a comprehensive transportation improvement strategy. The primary purpose of the study was to provide a decision-making tool for determining the transportation strategies based upon an initial identification of issues and a preliminary assessment of potential environmental impacts. The study evaluated, in detail, the engineering and environmental implications of the recommended alternative, as well as considered other modes and alignments for connecting the Dallas CBD to the southeastern portion of Dallas County. Extensive public and agency involvement was part of the study.

An evaluation process was conducted, as part of the MIS, that provided the technical framework through which potential transportation improvement alternatives and alignments were comparatively analyzed. The evaluation analysis determined how well each alternative addressed the identified travel needs, goals, and objectives. Conceptual alternatives were
initially screened during the Phase 1 Conceptual Evaluation of the MIS process. A range of alignments and modes were identified to try to meet the mobility needs of the corridor, which included Transportation Systems Management (TSM)/Congestion Management System (CMS), Transit/High Occupancy Vehicle (HOV), and Bus Rapid Transit (BRT), and 54 LRT options. The Phase 1 LRT alternative alignments considered in the Deep Ellum and South Dallas Areas are shown in Figure E.2.

Figure E.2 Phase 1 MIS LRT Alignment Alternatives in Deep Ellum and South Dallas

The screening approach was based on the goals and objectives described in Chapter 1 of the Draft EIS (DEIS). These alternatives represented a range of alignments and modes identified to meet the mobility needs of the corridor. Based on the evaluation measures and criteria established for this phase of the MIS process, the No-Build Alternative, TSM/CMS Alternative, and eight LRT Alignment Alternatives were recommended for further definition and evaluation in the second phase of the MIS.
In the Deep Ellum/Baylor area, the Live Oak/Hall and Ross/Haskell alignment options were not recommended for further consideration because they had lower projected ridership, increased travel times and costs, would not provide direct access to both Deep Ellum and Baylor HCS, potentially impacted parkland and historical properties on Live Oak and Haskell Avenue, required a higher number of displacements, and lacked public support. During this analysis, the public requested a station be included along Good-Latimer to further serve Deep Ellum and the proposed Latino Cultural Arts Center. In the South Dallas/Fair Park area, both the UP RR/Parry/South Dallas and SP RR/South Dallas options were recommended for further study in Phase 2 because both had similar ratings. A detailed discussion of the MIS process was documented in the Southeast Corridor Final Phase 1 Conceptual Evaluation Summary Report, June 1999, and is available to the public for review.

During the Phase 2 Detailed Evaluation of the MIS, a more extensive list of evaluation criteria and measures was applied for a comparative rating of the alternatives which provided information for the recommendation of the preferred investment strategy decision. The evaluation results, which are described in the Southeast Corridor Phase 2 Detailed Evaluation Summary Report, May 2000, is available to the public for review. A detailed list of evaluation criteria and measures were applied, comparatively rating each of the alternatives (including the No-Build Alternative). This rating system provided information for the recommendation of the preferred investment strategy decision. The alternative with the highest rating was ranked the best candidate for recommendation as part of the LPIS.

A final MIS report was circulated for public and agency review in the spring of 2000. On May 9, 2000, the DART Board of Directors selected LRT as the main component of the locally preferred investment strategy. The Build Alternative (LRT) selected had the best combination of cost, ridership, and public and agency support. It also had minimal environmental and community impacts because the majority of the alignment uses existing railroad right-of-way. It also provided the best access and had the most economic development potential for both the South Dallas community and Fair Park. Subsequently, FTA granted permission to DART to begin PE/EIS.
E4.2  Refinements of Alignment
During PE/EIS, DART reviewed the LRT alignment in numerous locations to consider engineering, operational, and environmental issues. Among the areas where the alignment was refined are:

- Good-Latimer Expressway/Gaston Avenue intersection, where two alternative alignment options were developed in response to community concerns about potential impacts to the Good-Latimer tunnel under Gaston Avenue.
- Parry Avenue/Haskell Avenue intersection, where the alignment’s curvature was refined to provide improved operation of the LRT line onto the east side of Parry Avenue while accounting for concurrent traffic and signal operations.
- R.B. Cullum Boulevard, where a proposed aerial crossing over the roadway was eliminated in response to community concerns about visual impacts.

E5.0  SECTION 4(f) PROPERTIES
Of the various categories of 4(f) properties, DART has determined that there are no waterfowl or wildlife refuges near the proposed alignment. Consequently, the only Section 4(f) properties of potential concern to this project are historic resources and parklands. For the purpose of this report Historic Resources have been subdivided into Architecturally Historic Properties, Archaeological Sites, and Traditional Cultural Properties. In each of the following subsections, properties that are subject to Section 4(f) are first identified, then assessed as to whether the project would result in either a direct or indirect use.

E5.1  Architecturally Historic Properties Subject to Section 4(f)
DART has undertaken a survey of architectural resources along the proposed corridor. An Area of Potential Effect (APE) within which the survey was conducted was defined in consultation with the SHPO. The APE for architecturally historical resources includes the parcels within and adjacent to the LRT alignment (including alignment options), parcels containing and adjacent to traction power substations, and parcels within a reasonable view shed of aerial structures.

The survey results were submitted to the SHPO for concurrence on eligibility of the surveyed resources (Attachment E1). The surveys of the proposed alignment identified the following resources for which the SHPO has made determinations of eligibility:
Four structures (other than those in Fair Park) are currently listed on the NRHP

Three Historic Districts listed on the NRHP, one of which is also a National Historic Landmark

Seven structures contribute to two eligible historic districts

Four properties are individually eligible for the NRHP.

Table E1 presents the architecturally historic properties in these various categories that lie within the APE and that are included in the Section 4(f) analysis.

<table>
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<th>Resource Name</th>
<th>Significance</th>
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<td>3301-3333 Elm Street, 212 and 232 Trunk Avenue</td>
<td>Continental Gin District</td>
<td>NRHP Listed 02-14-1983</td>
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<tr>
<td>1300 R.B. Cullum Blvd</td>
<td>Fair Park (Texas Centennial Exposition Buildings)</td>
<td>Designated a National Historic Landmark 09-24-1986; also a Historic District</td>
</tr>
<tr>
<td>4100 Commerce</td>
<td>Alexander Motor Company Building</td>
<td>Contributor to the Commerce Street Warehouse District, Eligible for the NRHP (2)</td>
</tr>
<tr>
<td>4118 Commerce</td>
<td>W. Gottlich Company Manufacturing Bldg.</td>
<td>Contributor to the Commerce Street Warehouse District, Eligible for the NRHP (2)</td>
</tr>
<tr>
<td>4044 Commerce</td>
<td>Lincoln Paint &amp; Color Co. Bldg.</td>
<td>Contributor to the Commerce Street Warehouse District, Eligible for the NRHP (2)</td>
</tr>
<tr>
<td>2551 Elm</td>
<td>Knights of Pythias Temple</td>
<td>Eligible individually for NRHP (2)</td>
</tr>
<tr>
<td>2605 Elm</td>
<td>Fink Paint Co. Bldg.</td>
<td>Contributor to the Deep Ellum Historic District, Eligible for the NRHP (2)</td>
</tr>
<tr>
<td>2625 Elm</td>
<td>Manufacturers Expo Bldg.</td>
<td>Contributor to the Deep Ellum Historic District, Eligible for the NRHP (2)</td>
</tr>
<tr>
<td>2615 Elm</td>
<td>American Transfer &amp; Storage</td>
<td>Eligible individually for the NRHP (2); Contributor to the Deep Ellum Historic District</td>
</tr>
<tr>
<td>2609 Elm</td>
<td>Southern Refrigeration Co. Bldg.</td>
<td>Contributor to the eligible Deep Ellum Historic District, Eligible for the NRHP (2)</td>
</tr>
<tr>
<td>3601 Main</td>
<td>National Biscuit Company</td>
<td>Eligible individually for the NRHP (2)</td>
</tr>
<tr>
<td>3801 Parry</td>
<td>Old Tige</td>
<td>Contributor to the Commerce Street Warehouse District, Eligible for the NRHP (2)</td>
</tr>
<tr>
<td>3809 Parry</td>
<td>Goodyear Tire and Rubber Company Building/Howard Wolfe Building and Garage</td>
<td>NRHP Listed 05-01-2002, Contributor to the Commerce Street Warehouse District</td>
</tr>
<tr>
<td>4140 Commerce</td>
<td>B. F. Goodrich Building</td>
<td>NRHP Listed 05-01-2002, Contributor to the Commerce Street Warehouse District</td>
</tr>
<tr>
<td>624 N. Good-Latimer</td>
<td>St. James AME Temple</td>
<td>Eligible individually for the NRHP (2)</td>
</tr>
<tr>
<td>400-500 N. Good-Latimer</td>
<td>Good-Latimer Tunnel</td>
<td>Eligible individually for the NRHP (1)</td>
</tr>
</tbody>
</table>

Notes:
(1) SHPO Determination of Eligibility letter to DART, February 1, 2002
(2) SHPO Determination of Eligibility letter to DART, March 25, 2002
DART analyzed the potential effects of the proposed primary LRT alternative in Chapter 5 of the DEIS. Although the analysis of effects in Chapter 5 is part of the Section 106 process, it also considered direct use and factors that are related to constructive use. The SHPO has reviewed DART’s proposed determination of effects and in a letter dated July 8, 2002, concurred that the project would have an adverse effect on the Good-Latimer Tunnel and without appropriate mitigation would have the potential to adversely affect the Fair Park National Historic Landmark.

E5.1.1 Section 4(f) Analysis of Architecturally Historic Properties
Of the listed and eligible architecturally historic properties subject to Section 4(f), two are subject to direct use: Fair Park Historic District and the Good-Latimer Tunnel. All of the other properties lie outside of the proposed LRT right-of-way.

E5.1.1.1 Direct Use at Fair Park
At Fair Park, part of the proposed station would lie within the boundary of the Fair Park Historic District/National Historic Landmark (Fair Park HD/NHL). The entire Fair Park HD/NHL covers approximately 277 acres. The boundary of Fair Park HD/NHL in the area of the proposed station (at the ceremonial entrance, opposite Exposition Avenue) is not defined by the existing ornamental fence of Fair Park. Rather, the boundary appears to follow the east curb line of the bus drop-off area. Between the Credentials Gate (on the north side of the Women’s Museum) and the First Avenue Gate (on the south side of the ceremonial entrance), the proposed LRT system and station would encroach on about 26,000 square feet of the Fair Park HD/NHL. The area of encroachment is outside of the existing ornamental fence and used for pedestrian queuing areas entering the park and bus access driveways. Both of these areas will be replaced in function with the introduction of the LRT passenger station. The pedestrian queuing needs will be replaced by the same area provided by the LRT platform area and the bus access driveways will be removed due to DART redistribution of bus route activity. Other portions of the proposed station would be located in an area of the Fair Park parkland boundary that is designated for street purposes (see discussion in Section E5.4.1 of this 4(f) Statement).

The boundary of the Fair Park HD/NHL would again be crossed by the LRT system south of the First Avenue Gate. The boundary crosses the berm that separates the service entrance to the Music Hall from the park circulation road on the north/east side of Cullum Boulevard. South of the First Avenue Gate, the line segment of the LRT would encroach on about 10,500 square
feet of the Fair Park HD/NHL. This area is currently used as a landscaped “berm” median separating two maintenance drives to service areas. Other portions of the LRT line segment would be located in an area of the Fair Park parkland boundary that is designated for street purposes (see discussion in Section E5.4.1 of this 4(f) Statement).

In total, the two areas of encroachment are about 36,500 square feet (about 0.84 acres). This is less than 0.31% of the total area of the Fair Park HD/NHL. Since the Build Alternative (LRT) project would make a direct use of this small area of a historic property, Section 4(f) requires documentation that:

1. There is no feasible and prudent alternative to such use, and
2. The project includes all possible planning to minimize harm to the property resulting from such use.

Discussion of Feasible and Prudent Alternatives
Determining whether there is no feasible and prudent alternative requires the consideration of avoidance alternatives. The types of alternatives that would avoid any use of the Fair Park HD/NHL property are: (a) do nothing of No-Build; (b) develop an alternative LRT alignment that avoids use of the property; or (c) modify the proposed LRT alignment to avoid use of the property. Based upon the discussions below, none of these would be feasible and prudent alternatives to the proposed project and the associated use of protected Section 4(f) land.

a. No-Build or Do Nothing Alternative. The alternative would not meet the goals and objectives established by DART to provide improved transit to communities in the Southeast Corridor. Further, a No-Build Alternative would not address the conditions expressed in the Purpose and Need Statement.

b. Alternative Alignments Avoiding Use of Property. A range of alignment alternatives were previously proposed and evaluated in the Southeast Corridor MIS. In May 2000, the DART Board of Directors selected an LRT alignment that included a station serving the ceremonial entrance of Fair Park as the Locally Preferred Investment Strategy (LPIS). The LPIS decision reflected the judgment of DART that the proposed alignment best meets the transportation needs of the Southeast Corridor and is therefore the most prudent alternative. The selection of the LPIS, which includes the alignment along Parry Avenue and a station at
the ceremonial entrance to Fair Park, was supported unanimously by has received favorable support from all affected stakeholders including the Dallas City Council, Dallas Landmark Commission, the Friends of Fair Park, Dallas Park Board, each institutional venue use within Fair Park, and the surrounding commercial and residential community. On December 8, 1999, the Dallas City Council passed a resolution supporting the Southeast Corridor Alignment that serves the ceremonial entrance to Fair Park. On January 14, 2003, the Dallas Landmark Commission passed a resolution supporting the Fair Park Station location and on January 29, 2003, the Commission approved a conceptual Certificate of Appropriateness for the Fair Park Station design. On February 20, 2003, the Friends of Fair Park passed a resolution supporting the Fair Park Station location.

c. Alignment Modification Avoiding Use of Property. The placement of the proposed LRT alignment and passenger station adjacent to the ceremonial entrance of Fair Park is constrained by several factors. In order to most efficiently and safely provide service to Fair Park, especially during events, the LRT station would be located near the existing central pedestrian access point (i.e., the ceremonial entrance to Fair Park). The area of the proposed LRT station is currently used for buses and would thus provide higher levels of accessibility for transit patrons. This area was also previously served by the Interurban trolley lines as depicted in Figure E.3. The proposed LRT station adjacent to the ceremonial entrance would serve a function that occurred at the same location when Fair Park was originally developed in 1936 for the Texas Centennial.

There are two alternative (avoidance) alignments avoiding use of the property: (1) shifting the LRT alignment to the eastern edge of Parry Avenue and (2) shifting the LRT alignment to the median of Parry Avenue. Shifting the LRT station to the eastern edge or median of Parry Avenue would require reduction of the street’s travel volume capacity from six to four lanes between Exposition Avenue and Haskell Avenue and the closure of left turn lanes. This would have a major negative effect on traffic movement in the area, especially during events at Fair Park including the Texas State Fair during the month of October each year. This would create a bottleneck in the city’s arterial network. A median station may not accommodate the anticipated crowds during the State Fair or major special events. Additionally, a median station would also require LRT passengers to cross two lanes of traffic to reach the ceremonial entrance, which would be much less safe than the proposed
location adjacent to the ceremonial entrance. Providing grade-separated pedestrian access to a median station in Parry Avenue would introduce either (1) an aerial structure that would be likely to be found to be an adverse visual effect relative to the historic ceremonial entrance, or (2) a subterranean passage that would be likely to be perceived as unsafe and which could be subject to dangerous overcrowding during events.

**Figure E.3 View of Trolley Lines serving Fair Park during the 1936 Texas Centennial**

In addition, there are two agreements or ordinances that prohibit the reduction of travel lanes of Parry Avenue from six lanes to four lanes. First, Section IX of the DART/City of Dallas Planning and Development Interlocal Agreement (ILA) prohibits DART’s ability to reduce travel lane capacity of major arterials for the purpose of introducing LRT service. Secondly, the City of Dallas Thoroughfare Plan prohibits the permanent reduction of travel lane capacity of major arterials for other purposes.
The location of the LRT station on the east side of Parry Avenue is also constrained by the need to provide tangent alignments before and after the station, so that the LRT vehicles are properly aligned with the platforms. Alignment of the rail vehicles with the platforms is critical to providing accessibility to persons with disabilities. The location is further constrained by the LRT alignment curve at the Parry Avenue/Pacific Avenue/Haskell Avenue intersection, where the overall alignment makes a 90-degree turn. Placing the station in the median of Parry Avenue would require either an extremely tight (and thus slow and probably noisy) curve from the LRT alignment along Pacific Avenue onto Parry Avenue, in addition to the traffic, circulation, and safety impacts previously noted.

Shifting the station north or south on the east side of Parry Avenue would still affect property within the Fair Park HD/NHL boundary. Placement of the station on the west side of Parry Avenue would likely require demolition of properties, including one potentially eligible structures (3801 Parry) and one NRHP-listed property (3809 Parry).

### E5.1.1.2 Direct Use at Good-Latimer Tunnel

The LRT alignment would travel down the middle of Good-Latimer Expressway. The Good-Latimer Tunnel, which occurs between Swiss Avenue and Elm Street, passes under Gaston Avenue and the former Texas & Pacific Railway that ran parallel to Gaston. The tunnel structure would be razed and the area filled in to bring the roadway to the same level as the surrounding roadways and properties. This would recreate an at-grade intersection with Gaston Avenue and Good-Latimer Expressway. An LRT station would be built between Swiss Avenue and Gaston Avenue on the restored grade.

Engineering studies have determined the tunnel is not structurally capable of sustaining the weight of LRT facilities (either line sections or the proposed station). This is in large part due to the lack of maintenance it has received over the years, coupled with periodic flooding. The tunnel does not meet current traffic design standards and there are no proposals by the City of Dallas to address design deficiencies in the foreseeable future. These deficiencies include narrow travel lanes, low vertical clearances, narrow sidewalks, inadequate sight distances, poor drainage, low light levels, and security visibility. Additionally, the tunnel does not meet the accessibility criteria of the Americans with Disabilities Act (ADA). Figures E.4 through E.7 shows conditions in the tunnel from the perspective of motorists and pedestrians.
The Deep Ellum Station would serve as a destination station and would not include parking, drop-off, or bus transfer facilities. This means the primary access to the station will be by walking. The narrow sidewalks and low light levels create safety and security problems, both for current users and, if the tunnel were to continue to be used as an access route, for future patrons bound to and from the Deep Ellum Station. Lighting within the tunnel could help improve visibility but would not eliminate security concerns for patrons in the tunnel which includes many hiding places that exist between columns. Additionally, during times of heavy rain, the tunnel floods making both the roadway and sidewalks impassable. During the comment period for the DEIS, residents and employees from the area stated they avoid the tunnel and area because it is unsafe to walk through, even during the daytime. The tunnel is considered an attractive nuisance, a barrier, and a haven for homeless persons. Attachment E2 includes a summary of both verbal and written comments received.

By razing the tunnel and filling the area to bring the roadway to the same level as the surrounding roadways and properties, this would recreate the at-grade intersection with Gaston Avenue and improve vehicle and pedestrian access to Deep Ellum. It would increase access to properties near the tunnel and remove the confusing service roads between Swiss and Gaston. According to the Dallas Police Department accident statistics for 2001, there were 23 vehicular accidents between 200 and 500 blocks of North Good-Latimer. Of these, 11 involved the 400 block/tunnel, with seven accidents considered major. In addition, five accidents involved Swiss Avenue and Good-Latimer intersection near the tunnel service road. The tunnel requires the service roads to provide access to adjacent properties and Gaston Avenue but creates poor visibility and awkward access for vehicles.

Removing the tunnel would not require the relocation of any businesses or residents and allows for increased economic development opportunities, which is one of the four primary purposes of the proposed action. Bringing Good-Latimer back to its original grade would allow more opportunities and flexibility for transit and pedestrian-oriented development. The area is on the fringe on the redeveloping area of Deep Ellum. Adjacent property owners are supportive of LRT in the median of Good-Latimer because it would increase the visibility and access to their properties.
Figure E.4 View of Good-Latimer Tunnel Looking North

Figure E.5 View of Good-Latimer Tunnel Looking South
Figure E.6 View of Pedestrian Tunnel in the West Tunnel Section

Figure E.7 View of Sidewalk along East Tunnel
Along Good-Latimer are two other properties that are eligible for listing in the NRHP, St. James AME Temple (east of Good-Latimer at Florence) and Knights of Pythias Temple (west side of Good-Latimer at Elm). The St. James AME Temple was constructed in 1919 and the Knights of Pythias Temple was built in 1916, pre-dating the construction of the tunnels. Both buildings were designed by William Sydney Pittman, are considered significant African-American buildings in Dallas, and were financed and built by African-Americans. The use of the median of Good-Latimer maintains the existing transportation corridor and does not encroach upon either building.

Dallas City Council has been supportive of DART LRT in the median of Good-Latimer. In May 1997, a Thoroughfare Plan Amendment was passed by the city council of the City of Dallas that established a special cross section placing LRT in the median of Good-Latimer Expressway from Bryan Street to the DART owned railroad right-of-way just prior to Elm. Additionally, on December 15, 1999, Dallas City Council passed a resolution endorsing the Southeast Corridor with LRT in the median of Good-Latimer. Upon the review of the DEIS and comments from the community, Dallas City Council passed a third resolution in support of Good-Latimer alignment that requires filling the Good-Latimer Tunnel and placing LRT in the median of Good-Latimer between Bryan Street and the DART owned UP RR right-of-way. The city council cited that though the tunnel is eligible for the NRHP, it is in extremely deteriorated condition and has outlived its design life and original purpose. Dallas City Council also considered that removing the tunnel would have the least impact to historic resources, have the greatest potential to promoted redevelopment, improve vehicular and pedestrian safety, and enhance access to the LRT station.

As stated previously, the overall configuration of the tunnels (west side built in 1930 and the east side built in 1952) do not meet current roadway design standards. A complete rehabilitation of the tunnels would be required to provide adequate structural support for the LRT elements and to bring the tunnel into compliance with current roadway design standards. Although rehabilitation of the tunnels would continue their existence in the same locations and performing the same functions noted in the SHPO letter of eligibility (February 1, 2002), bringing the tunnels into compliance with current design standards would be likely to result in one of two conditions:
• Substantial changes in architectural features, such that the resulting visual images of the tunnels no longer represent the styles of 1930’s and 1950’s construction, if all design current standards are met, or
• Failure to meet design standards and the legal requirements of ADA, if the architectural features are maintained.

If waivers of design standards were obtainable, there would still be safety and security concerns for pedestrians because of the many hiding places provided by the columns placed along the subterranean walkways. Requirements for compliance with ADA, which would come to bear if the tunnels are rehabilitated to provide the necessary structural support for the LRT elements, cannot be waived.

The SHPO has determined that the Good-Latimer Tunnel is eligible for listing in the NRHP. Since the alignment would require a direct use of historic property, Section 4(f) requires documentation that:

(1) There is no feasible and prudent alternative to such use, and
(2) The project includes all possible planning to minimize harm to the property resulting from such use.

Discussion of Feasible and Prudent Alternatives

Determining whether there is no feasible and prudent alternative requires the consideration of avoidance alternatives. The types of alternatives that would avoid any use of the Good-Latimer Tunnel are: (a) do nothing or No-Build; (b) develop alternative LRT alignments that avoid use of the property; or (c) modify the proposed LRT alignment to avoid use of the property. Based upon the discussions below, none of these would be feasible and prudent alternatives to the proposed project and the associated use of protected Section 4(f) land.

a. No-Build or Do Nothing Alternative. The alternative would not meet the goals and objectives established by DART to provide improved transit to communities in the Southeast Corridor. Further, a No-Build Alternative would not address the conditions expressed in the Purpose and Need Statement.
b. Alternative Alignments Avoiding Use of Property. The overall Good-Latimer alignment provides the most reasonable way to connect the existing Pearl Street station in downtown Dallas to the railroad alignment through Deep Ellum. As discussed in Section E4.1, the MIS which preceded the DEIS evaluated numerous alignment options and selected an alignment along Good-Latimer as the best combination of service, impacts, community support, and costs. Streets that run parallel to Good-Latimer that could potentially be used for an alignment are narrower and discontinuous. An alignment along these parallel streets would not provide sufficient room for placing stations within street right-of-way without causing substantial impacts to adjoining properties. Additionally, the 480 unit Gaston Yard Apartments, extending from Good-Latimer to Malcolm X Boulevard, provides a formidable barrier to most parallel alignment options.

Only a segment of the overall Good-Latimer alignment between downtown and the railroad would create a Section 4(f) use near the Good-Latimer Tunnel. Alignment modification options in that area which would avoid direct use of the tunnel are discussed in the next section.

c. Alignment Modification Avoiding Use of Property. There are two alternative (avoidance) alignments avoiding use of the property. Option B would shift the LRT alignment and station to the western edge of Good-Latimer. Option C would shift the LRT alignment and station to the eastern edge of Good-Latimer. The alignment which travels down the middle of Good-Latimer and would require razing and filling in the tunnel has been designated Option A.

Good-Latimer Alignment Option B

This option would avoid the existing tunnel and allow it to stay in place by shifting the LRT alignment to the west (Figure E.8). This alignment option would also require the construction of a new one-way street west of the LRT to allow access to adjacent properties and closing Swiss Avenue between Good-Latimer and the new one-way street.

The alignment was designed to meet design requirements and provide proper location for a station while minimizing displacements and avoid physical impact to the tunnel. Because the tunnel cannot structurally support LRT, the alignment was designed to avoid placing any structural load on the tunnel and protect the LRT line in the event the tunnel would collapse.
and interrupt LRT service. Additionally, a sidewalk from Elm to Gaston Avenue would need to be built along the west side of the alignment to provide safe, visible, and ADA access to the station.

**Figure E.8 Good-Latimer Alignment Option B**

This alignment option would require the acquisition of several properties, including:

- Commercial properties at 615 Good-Latimer (6 commercial tenants) and 2519 Swiss Avenue
- Eight residential units at 2511 Swiss Avenue
- One vacant building located at 505 Good-Latimer and four vacant parcels
- A portion of the property for the Knights of Pythias Temple at 2551 Elm Street

**Impacts and Issues for Option B**

- Of these properties, the Knights of Pythias Temple is eligible for the NRHP. Option B would make direct use of the property and therefore having an impact to a Section 4(f) property. This would thus not be a viable alternative to Option A.
- The alignment would be about 35 feet from the rear of the building and could have a visual impact to the temple. Additionally, the Option B alignment would include an aerial structure across the south entrance of the tunnel as shown in Figure E.9. A determination of effects for these circumstances has not yet been made in consultation with the SHPO; there is the possibility that this structure would result in an adverse effect under Section 106 to both the Knights of Pythias and the tunnel. Under Section 4(f), the
aerial structure raises the potential for constructive use, which is discussed in Section E5.1.3.

- Swiss Avenue is a major east-west thoroughfare that would need to be closed as a through street in order to accommodate a full-length station platform. Traffic bound for Good-Latimer Expressway from areas to the west would need to be shifted northward to Florence, which is not a major thoroughfare, or southward to Pacific/Gaston Avenue.

- Efforts to redevelop this area have been on-going but have occurred at a slower pace than Deep Ellum and Bryan Place. The acquisition of property would disrupt mixed-use redevelopment efforts by displacing eight residences and seven businesses that create jobs, generate taxes and contribute to the economic vitality of the neighborhood.

- Option B would not be as conducive to transit and pedestrian-oriented development. The tunnel would remain in place. It is perceived as a barrier and uninviting to pedestrians.

- The cost of acquiring, relocation, and demolition of the commercial and residential properties has been estimated by DART at more than $4.85 million.

**Figure E.9 View of Option B Looking North**
• The commercial properties include tenants and uses that have a potential for having created hazardous materials impacts to the properties. These include past and current uses for automotive services 615 Good-Latimer, a former printing operation at 505 Good-Latimer Expressway, and a service station at 2519 Swiss Avenue. Each of these has a potential for having created hazardous materials impacts to the property. The cost of potential clean-up of hazardous materials has not been estimated.

• The LRT alignment would transition from the median of Good-Latimer near the intersection with Florence creating a situation that is difficult to signalize and sign.

• Conditions associated with the deficiencies of the Good-Latimer Tunnel (narrow travel lanes, low vertical clearances, narrow sidewalks, inadequate sight distances, flooding, and security visibility) would continue.

Good-Latimer Alignment Option C

Option C is similar to Option B, but with the LRT alignment being shifted to the east at Florence Street (Figure E.10). This option includes the construction of an LRT station between Swiss Avenue and Gaston Avenue on the east side of the Good-Latimer Tunnel. This alignment option would also require the construction of a new street between Swiss and Gaston, east of the LRT station to allow access to adjacent properties. This alignment option would require the acquisition of several properties, including:

• Property from the St. James AME Temple at 624 N. Good-Latimer.
• Commercial properties at 2601 and 2606 Swiss Avenue, and 2601 Gaston Avenue.
• Non-profit group, Shared Housing, located at 402 Good-Latimer.
• Twenty-four residential units from the Gaston Yard Apartments. The shift of the LRT alignment to the east would require a curve across the Gaston Yards Apartment property in order to transition onto the alignment parallel to Monument Street. The alignment would occupy the current driveway to the Gaston Yard Apartments, which is also a required fire access route. To maintain access and circulation in the apartment complex for safety and emergency equipment access, the driveway would have to be replaced causing the displacement of 24 apartments.
Impacts and Issues for Option C

- Of these properties, the St. James AME Temple is eligible for the NRHP. Option C would make direct use and alter access to St. James AME Temple which is eligible for the National Register therefore having an impact to a Section 4(f) property. This would thus not be a viable alternative to Option A.
- The shift of the alignment closer to the Gaston Yard Apartments would greatly increase the potential for noise and visual impacts to residents. Option C would move the LRT alignment closer to apartment units on the east end of the complex. The alignment would be inside the current apartment boundary.
- Efforts to redevelop this area have been on-going but have occurred at a slower pace than Deep Ellum and Bryan Place. The acquisition of property would disruption redevelopment efforts by three businesses and one non-profit organization that create jobs, generate taxes, and contribute to the economic vitality of the neighborhood.
- Option C would not be as conducive to transit and pedestrian-oriented development. The tunnel would remain in place. It is perceived as a barrier and uninviting to pedestrians.
- The cost of acquiring, relocation and demolition of the commercial and residential properties has been estimated by DART at more than $5.2 million.
- The commercial properties include tenants and uses that have a potential for having created hazardous materials impacts to the properties. This includes past and current use for automotive services 2606 Swiss Avenue. The cost of potential mitigation of hazardous materials has not been estimated.
• Conditions associated with the deficiencies of the Good-Latimer Tunnel (narrow lanes, low vertical clearances, narrow sidewalks, inadequate sight distances, flooding, ADA compliance and security visibility) would continue.

• The LRT alignment would transition from the median of Good-Latimer near the intersection with Florence creating a situation that is difficult to signalize and sign.

**Summary of Good-Latimer Impacts**

Although alignment Options B and C are technically feasible alternatives to Option A, they are not prudent because of the array of impacts that would arise from their implementation. Both Options B and C would require direct use of another Section 4(f) property. Because of the visual impact to the tunnel and Knights of Pythias, Option B would have a constructive impact on both structures. The levels of impact to the Good-Latimer Tunnel area from Options B or C would be greater than for Option A, as summarized in Table E2.

**Table E2 Comparison of Good-Latimer Tunnel Alternatives**

<table>
<thead>
<tr>
<th>Issue</th>
<th>No Build</th>
<th>Option A</th>
<th>Option B</th>
<th>Option C</th>
</tr>
</thead>
<tbody>
<tr>
<td>Structural stability of tunnel</td>
<td>Does not address structural stability of integrity of the tunnel</td>
<td>Razing and filling in tunnel resolves structural issue</td>
<td>Does not address structural stability of integrity of the tunnel</td>
<td>Does not address structural stability of integrity of the tunnel</td>
</tr>
<tr>
<td>Acquisitions and Displacements</td>
<td>No acquisitions or displacement</td>
<td>Requires acquisition of 2 vacant parcels</td>
<td>Requires acquisition of 7 commercial properties, 8 residential units, 4 vacant parcels, and land from the Knights of Pythias Temple. Right-of-way costs estimated at $4.85 million.</td>
<td>Requires acquisition of 3 commercial properties, 1 non-profit organization, 24 apartment units, and land from the St. James AME Temple. Right-of-way costs estimated at $5.2 million.</td>
</tr>
<tr>
<td>Hazardous materials</td>
<td>No change from existing conditions</td>
<td>Limited potential to encounter during construction</td>
<td>High potential for encounter on properties to be acquired</td>
<td>Moderate to high potential for encounter on properties to be acquired</td>
</tr>
<tr>
<td>Pedestrian access and safety</td>
<td>No change; pedestrian access via tunnel’s narrow, subsurface walkways; low visibility; non-ADA compliant</td>
<td>Pedestrian access via surface walks along the at-grade roadway thus providing high visibility</td>
<td>Additional pedestrian access would be required via surface walks to provide higher visibility. Pedestrian access via tunnel’s narrow, subsurface walkways; non-ADA compliant would still be possible</td>
<td>No change; pedestrian access via tunnel’s narrow, subsurface walkways; low visibility; non-ADA compliant</td>
</tr>
<tr>
<td>Issue</td>
<td>No Build</td>
<td>Option A</td>
<td>Option B</td>
<td>Option C</td>
</tr>
<tr>
<td>----------------------------</td>
<td>--------------------------------------------------------------------------</td>
<td>------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Traffic and Access</td>
<td>No change from existing conditions</td>
<td>Recreates at-grade intersection with Good-Latimer. Eliminates confusing access via service roads. Greatly improved access to adjacent properties and Deep Ellum. Overall improved circulation within area.</td>
<td>Closes west side, at-grade segment of Good-Latimer (south of Swiss) and requires a new one-way street. Changes access route for properties in west Deep Ellum. Adds LRT operations to a confusing traffic situation.</td>
<td>Closes east side, at-grade segment of Good-Latimer (south of Swiss). Adds LRT operations to a confusing traffic situation.</td>
</tr>
<tr>
<td>Visual</td>
<td>No change from existing conditions</td>
<td>Recreates visual appearance in the 1910’s when the Knights of Pythias and St. James AME Temple were originally constructed.</td>
<td>Introduces new visual elements. Potential visual impacts to Knights of Pythias Temple, Gaston Yard apartments, and to south portal of tunnel.</td>
<td>Introduces new visual elements. Potential visual impacts to St. James AME Temple and to apartments</td>
</tr>
<tr>
<td>Historic</td>
<td>No change. Any structural rehabilitation project that would bring tunnel into conformity with design standards would have an adverse effect</td>
<td>Adverse effect to Good-Latimer tunnel from direct use. No adverse effects to Knights of Pythias Temple or St. James AME Temple</td>
<td>Adverse effect to Knights of Pythias Temple from direct use. Potential constructive use to Good-Latimer tunnel and Knights of Pythias.</td>
<td>Adverse effect to St. James AME Temple from direct use. Also, constructive use of property because of alteration of access.</td>
</tr>
<tr>
<td>Noise</td>
<td>No change from existing conditions</td>
<td>No noise impacts to Section 4(f) properties</td>
<td>No noise impacts to Section 4(f) properties</td>
<td>No noise impacts to Section 4(f) properties</td>
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<tr>
<td>Public and Agency Support</td>
<td>No public or agency support. The Dallas Landmark Commission and Preservation Dallas have indicated a better option may exist.</td>
<td>Supported by Dallas City Council, Deep Ellum Association, Deep Ellum Foundation, Meadows Foundation, Dallas Morning News, Shared Housing, adjacent property owners, and Deep Ellum residents</td>
<td>Minimal public support</td>
<td>No public or agency support</td>
</tr>
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</table>

**E5.1.2  Temporary Use**

The areas of the Fair Park HD/NHL identified for direct use would also be affected on a temporary basis during construction. As noted under the definitions under Section E3.1, such temporary use is not a Section 4(f) use. Conditions to protect adjoining areas of the Fair Park HD/NHL during the construction process will be developed as part of the consultation process.
The areas for the Good-Latimer options identified for direct use would also be affected on a temporary basis during construction. As noted under the definitions under Section E3.1, such temporary use is not a Section 4(f) use. None of the options would create a temporary use on nearby Section 4(f) properties during construction.

### E5.1.3 Constructive Use

U.S. DOT guidance on Section 4(f) (23 CFR Section 771.135 [p][4]) indicates that constructive use occurs under various circumstances, as described below. After each of these conditions, the impact of the proposed LRT relative to the circumstance raised is described.

(i) **The projected noise level increase attributable to the project substantially interferes with the use and enjoyment of a noise-sensitive facility of a resource protected by Section 4(f), such as hearing the performances at an outdoor amphitheater, sleeping in the sleeping area of a campground, enjoyment of a historic site where a quiet setting is a generally recognized feature or attribute of the site's significance, or enjoyment of an urban park where serenity and quiet are significant attributes;**

The noise analysis prepared for the proposed LRT system indicates that there would be no noise impacts at Fair Park. The current, measured noise level of 63 dBA would increase by just over one dBA with LRT operation.

For the Good-Latimer Options, there would be no noise impacts to any historic properties.

(ii) **The proximity of the proposed project substantially impairs aesthetic features or attributes of a resource protected by Section 4(f), where such features or attributes are considered important contributing elements to the value of the resource. Examples of substantial impairment to visual or aesthetic qualities would be location of a proposed transportation facility in such proximity that it obstructs or eliminates the primary views of an architecturally significant historical building, or substantially detracts from the setting of a park or historic site which derives its value in substantial part due to its setting**

Without appropriate mitigation, the proposed LRT station and other system elements have the potential to yield a constructive use arising from proximity. Coordination and consultation with
the Dallas Landmark Commission, Dallas Parks Board, Friends of Fair Park, Preservation Dallas, and the SHPO is on-going to ensure that the LRT system elements design will have no adverse effects on the Fair Park HD/NHL.

With regard to the Good-Latimer options, there do not appear to be proximity impacts to Section 4(f) resources under Option A. LRT is a transportation element that would be located within an existing transportation corridor. Option B could have a visual impact to the Knights of Pythias Temple. These proximity impacts can be considered as constructive uses of this property since they have a very high potential to adversely affect the setting, utilization, and functions of the building. Additional property, beyond what would be needed for the LRT alignment, would also need to be acquired to provide ADA access to the station. Redevelopment scenarios that have been considered for this building, which are essential to its long-term preservation, could be negatively influenced by visual, noise, or property acquisition arising from Option B. The type of redevelopment that could occur at the temple would be influenced by the presence of a nearby aerial structure.

Option C would include the crossing of the St. James AME Temple property at an angle, changing the orientation/relationship of the building to the streetscape. The building was designed and placed at right angles to the adjoining streets.

(iii) The project results in a restriction on access, which substantially diminishes the utility of a significant publicly owned park, recreation area, or a historic site.

The proposed LRT system will alter, without diminishing, access to the Fair Park HD/NHL. The LRT Station and planned pedestrian improvement will actually increase overall access to the park. The Washington Street gate along Parry Avenue at the northwest corner of Fair Park will be closed to automobile traffic. This closure will eliminate potential conflicts between automobile traffic and LRT traffic. A new automobile gate will be provided a few hundred feet to the east along Haskell Avenue on the north side of the park. A little used service road and gate at the southeast corner of the park will be closed to make way for the LRT line. Traffic currently using this road will be internally rerouted within the park. Without substantially diminishing access, the LRT line will pass in front of the ceremonial pedestrian gate and the 1st Street automobile gate,
both along Parry Avenue. The LRT Station and planned pedestrian improvement will actually increase overall access to the Fair Park HD/NHL.

For the Good-Latimer options, Option A would remove access to the Good-Latimer Tunnel, but would maintain the current access to all other eligible Section 4(f) properties in the area. Option B would not change the access to eligible properties. Option C would change the access to the St. James AME Temple property.

(iv) The vibration impact from operation of the project substantially impairs the use of a Section 4(f) resource, such as projected vibration levels from a rail transit project that are great enough to affect the structural integrity of a historic building or substantially diminish the utility of the building.

The vibration analysis prepared for the proposed LRT system indicates that there would be no vibration impacts at Fair Park or along Good-Latimer. The highest projected vibration level of 70 VdB is actually below the impact threshold of 75 VdB.

Conclusion
The proposed LRT system will not have a constructive use on the Fair Park HD/NHL because the proposed project does not violate the conditions of items (i) through (iv). SHPO has been consulted and will continue to be to ensure that conditions of item (ii) will not be violated.

For the Good-Latimer area, Option A does not include any constructive uses. Option B appears to create a constructive use under item (ii). Option C appears to create a constructive use under items (ii), and (iii).

E5.1.4 Finding for Architecturally Historic Properties

Fair Park
A direct use of approximately 0.84 acres of the Fair Park HD/NHL is required for implementation of the proposed Built Alternative (LRT) project. However, there is no feasible and prudent alternative to the use of the historic property and a process to incorporate all possible planning to minimize harm has been established. The potential adverse effect to the Fair Park HD/HNL
will be mitigated through a sensitive design that minimizes vertical station elements and captures design elements of the 1936 park entrance. On-going coordination with the SHPO will ensure that the design of the LRT alignment will avoid adverse effect to the property. In a letter dated July 8, 2002, the SHPO recommended that a Memorandum of Agreement (MOA) be developed to address use, design and construction of the LRT Project. This agreement is included in Appendix G of the FEIS. A copy of the July 8, 2002 letter is contained in Attachment E3.

**Good-Latimer Tunnel**

Option A would include direct use of the Good-Latimer Tunnel, which has been found eligible for the NRHP. Although there are feasible avoidance alternatives (Options B and C) to the use of the Good-Latimer Tunnel, the FTA has determined these alternatives are not prudent based on their impacts. The impacts of the avoidance alternatives include the direct use of other eligible properties or potentially eligible properties, as well as constructive use of eligible or potentially eligible properties. Additionally, the avoidance alternatives have the potential to create adverse effects to other properties that are potentially eligible for listing on the NRHP.

Removing the tunnel would have the no effect on the St. James AME Temple and Knight of Pythias Temple, require no displacements of businesses or residents, have the greatest potential to promoted redevelopment and transit oriented development, improve vehicular and pedestrian safety, and enhance access to the LRT station. Based on these positive effects and the strong community desire for LRT service along Good-Latimer, Option A has the greatest public and agency support. In summary, the impacts and effects of the avoidance alternatives are substantially greater than the impacts and effects associated with the use of the tunnel. In a letter dated July 8, 2002, the SHPO concurred that the demolition of the Good-Latimer Tunnel would have an adverse effect on the historic property and recommended development of appropriate mitigation documentation should be stipulated in a MOA. This agreement is included in Appendix G of the FEIS. A copy of the July 8, 2002 letter is contained in Attachment E3.
E5.2 Archeological Resources Subject to Section 4(f)

DART has undertaken a survey of archeological resources along the proposed corridor. The APE includes any ground area that would be disturbed by excavation, grading or construction. The cultural resource survey for the proposed project included identification of known archeological resources along the proposed alignment. As provided under Section 26.7 of the Antiquities Code of Texas, Fair Park is a State Archeological Landmark. There is the potential to encounter archeological resources during the construction process. Although much of the proposed right-of-way has been previously disturbed, the potential to encounter resources from the historic and prehistoric periods still occurs.

E5.2.1 Direct Use of Archeological Resources

As noted in Section E5.1, the proposed project would require direct use of approximately 0.84 acres of the Fair Park HD/NHL, which is also a State Archeological Landmark. The area that is subject to construction for the placement of new facilities has been previously disturbed and thus the potential to encounter unanticipated resources is very low. However, because under the Antiquities Code historic buildings and other structures are considered to be archeological landmarks, construction of the proposed LRT station and other system elements would require a permit from the THC.

As discussed under Section E5.1.1.1 above, there are no feasible and prudent alternatives to the direct use of the Fair Park State Archeological Landmark and a process to incorporate all possible planning to minimize harm has been established.

Construction for the LRT line across White Rock Creek would occur in an area that has been previously disturbed and that also has a low potential to encounter unanticipated resources. The areas adjacent to and within the corridor have been highly affected by railroad construction, maintenance, and urban development over the past century, and shovel testing of the least disturbed areas yielded no artifacts. The only cultural find was a single historic locality, which appears to represent a construction materials dumping area. In addition to the backhoe trenching at White Rock Creek, visual assessments were made of the floodplains of the other five drainages in the project area. All were found to be either highly disturbed or to be steep-sided drainages with no floodplain or terrace surfaces suitable for occupation.
E5.2.2 Temporary Use
The areas of the Fair Park HD/NHL identified for direct use would also be affected on a temporary basis during construction. As noted under the definitions under Section E3.1, such temporary use is not a Section 4(f) use. Conditions to protect adjoining areas of the Fair Park HD/NHL during the construction process will be developed as part of the consultation process.

E5.2.3 Constructive Use
Since the Fair Park HD/NHL is a State Archeological Landmark, there is also the potential for its constructive use as an archeological resource. Based on the discussion in Section E5.1.1.1 of this 4(f) Statement, there would not be a constructive use of the Fair Park HD/NHL from an archeological perspective.

For other areas where there is a potential for discovery of unanticipated resources, the types of constructive use conditions identified in Section E5.1.1.1 of this 4(f) Statement would not have an effect on archeological resources.

E5.2.4 Finding for Archeological Resources
A direct use of approximately 0.84 acres of the Fair Park State Archeological Landmark is required for implementation of the proposed project. However, there is no feasible and prudent alternative to the use of the archeological resource and a process to incorporate all possible planning to minimize harm has been established. The SHPO and the Advisory Council on Historic Preservation will be provided the opportunity to comment on this finding by circulation of this document.

E5.3 Traditional Cultural Properties
Traditional Cultural Properties are defined as eligible for inclusion in the NRHP because of their association with cultural practices or beliefs of a living community that are rooted in that community’s history, and are important in maintaining the continuing cultural identity of the community. The surveys of historical and archeological resources along the proposed corridor did not identify any Traditional Cultural Properties. During the public comment period for the DEIS, a Comanche Storytelling Place was identified as a potential Traditional Cultural Property. The Storytelling Place is located on the escarpment ridgeline along the DART right-of-way in Devon-Anderson Park (Figure E.11).
Traditionally, a Storytelling Place is used as means of cultural transition for Comanche children and young adults. Although, events associated with this site involve the sacred traditions that can only be discussed among the Comanche people, the Storytelling Place is essentially a gathering place where stories were shared and games played. The necessary components of a Storytelling Place include a natural spring, specific rock formations, timber, medicinal plants, minerals, berries, fish, and game. The location within Devon-Anderson Park contains all of these qualifying factors. The limestone outcropping of rock that forms a bowl-shaped configuration that is luminescent in the moonlight is a very significant feature of the Storytelling Place. The background documentation provided by the Comanche Nation and interested local environmental groups is contained in Attachment E4. Additionally, the Storytelling Place also functions as a scenic overlook from the escarpment to the Great Trinity Forest.

An archeological investigation by DART within the project limits did not identify any information directly related to the Comanche People or the Storytelling Place. However, after consultation with the SHPO and the Comanche Nation regarding the Storytelling Place, DART conducted a pedestrian archaeological survey of the DART right-of-way adjacent to parkland and the Storytelling Place. This survey did not encounter any items of significant relevance to the Storytelling Place.

The Comanche Nation has recognized the location in Devon-Anderson Park as having the characteristics of a traditional Storytelling Place. Local advocates of the Storytelling Place have provided some historical documentation along with geographical and archaeological evidence that indicate that the Comanche People may have occupied the Great Trinity Forest in the Dallas area prior to 1840. The oral history and sacred traditions of the Comanche People bolstered by this indirect empirical evidence helped the Comanche Nation identify the location in Devon-Anderson Park as a Storytelling Place. On May 23, 2002, the Comanche Nation proclaimed the site sacred.

As the Storytelling Place was only brought to DART’s attention during the public comment period for the DEIS in April 2002, it was not included in earlier consultation with the SHPO. Documentation supporting the site within Devon-Anderson Park as eligible for the NRHP is limited, however, the Comanche Nation has a strong oral tradition that supports this location as a Storytelling Place. Given this oral tradition and the Comanche Nation’s proclamation that the
site is sacred, FTA and DART have determined that the site is potentially eligible for the NRHP. The Comanche Nation is not presently seeking to have the Storytelling Place listed as individual Traditional Cultural Property, but they are working with interested local environmental groups to elevate recognition of the Storytelling Place as a component of a National Historic District, Traditional Cultural Property. This district would include additional resources that are significant to the Comanche People but are not within the APE of the Southeast Corridor LRT Project.

E5.3.1 Direct Use
The Comanche Storytelling Place is located on the escarpment ridge adjacent to the DART right-of-way at Station 505+50 in Appendix D of the DEIS. As originally designed, the rail project will cut into the face and require a retaining wall approximately 10 feet east of the east right-of-way line. Throughout this portion of the corridor, fencing will be placed on both sides of the rail corridor at edge of the DART owned right-of-way for safety because the LRT will be traveling above 45 mph. The fence along the eastside of the right-of-way will be located at the top of the escarpment. Figure E.12 shows the cross section of this design at the Storytelling Place.

Figure E.12 Cross Section of Proposed Design at the Comanche Storytelling Place
At the Storytelling Place, it appears that the face of the escarpment that extends into the rail right-of-way has previously been altered. There is a well-defined 2:1 slope from the top of the escarpment at the edge of the right-of-way down to the existing track bed. This defined slope appears to have been man-made and is typical of the practices the railroads used to make construct rail lines. The subsequent erosion patterns of this area of the escarpment support this concept.

The catenary wire will be place along the rail corridor approximately 18 to 20 feet above the top of rail. The wire is supported by 22-foot to 26-foot tall catenary poles that will be placed every 40 to 180 feet along the corridor. Pole placement is subject to grade and curvature of the alignment and the exact locations will not be determined until final design. Safety concerns require the placement of fencing along the edge of the right-of-way. This is especially a concern at the Storytelling Place where DART would cut into the escarpment creating a sheer drop off from the public park.

The bowl shaped outcropping of rock that has been identified as the Comanche Storytelling Place is located within Devon-Anderson Park. The DART light rail project will be located within the existing railroad right-of-way and will not encroach into the park. At the Storytelling Place, the escarpment extends into the DART owned right-of-way; however, cutting into this previously altered slope will not have a direct impact to the Storytelling Place. The Southeast Corridor light rail project will not require a direct use of the Comanche Storytelling Place in Devon-Anderson Park.

E5.3.2 Temporary Use
The Comanche Storytelling Place is located within Devon-Anderson Park. As indicated in Section E5.4.2, DART construction activity will not constitute a Temporary Use of Devon-Anderson Park. Therefore, DART construction activity will not constitute a Temporary Use of the Comanche Storytelling Place.

E5.3.3 Constructive Use
U.S. DOT guidance on Section 4(f) indicates that constructive use occurs under the various circumstances detailed in Section E5.1.3 of this document. Each of these conditions is briefly
described below followed by description of the impact of the proposed project as it relates to the circumstance.

(i) *The projected noise level increase attributable to the project substantially interferes with the use and enjoyment of a noise-sensitive facility of a resource protected by Section 4(f).*

The Comanche Nation did not identify noise as a concern in the coordination and consultation regarding the Storytelling Place. The LRT trains running adjacent to the Storytelling Place will operate on a straight, flat section of rail without any nearby special trackwork or at-grade crossings. This will result in a quiet rail segment.

Any noise impact introduced by light rail at the Storytelling Place will be mitigated by the retaining wall that will be constructed at the Storytelling Place. The retaining wall will be significantly higher than typical sound walls and sufficiently wide enough to function as an effective noise barrier. The design of the LRT will not result in a noise impact to the Comanche Storytelling Place. Noise generated by the LRT line will not substantially interfere with the use of the site.

(ii) *The proximity of the proposed project substantially impairs aesthetic features or attributes of a resource protected by Section 4(f), where such features or attributes are considered important contributing elements to the value of the resource.*

The light rail line will be placed in a corridor that has traditional been used for transportation purposes. However, new LRT system elements will be constructed within this corridor. These system elements include: catenary wire, catenary poles, a retaining wall, and fencing. The catenary wire, which will generally blend into the wooded background, will be slightly higher than the top of the escarpment. As the view from the escarpment is out and over the treetops, the catenary wire will not impact the Storytelling Place. Catenary poles can be spaced far enough away from the Storytelling Place to avoid a visual impact. Cutting into the escarpment face and placing a retaining wall will alter the visual appearance of the area and could have an effect on the Storytelling Place. Additionally, the placement of the fence on the right-of-way line at the top of the escarpment will alter the visual appearance of the area and could have an effect on the Storytelling Place.
Without planning to minimize harm and appropriate mitigation, the proposed LRT system elements have the potential to yield a constructive use arising from proximity. Coordination and consultation with the Comanche Nation is on-going to ensure that the LRT system elements design will have no affects on the integrity of the Comanche Storytelling Place.

(iii) The project results in a restriction on access, which substantially diminishes the utility of significant publicly owned park, recreation area, or historic site.

The only permitted access to the Storytelling Place is from the east through Devon-Anderson Park. The LRT line and its elements will eliminate informal access across the railroad corridor. The railroad corridor predates the parkland and there are no licensed or authorized crossings of the railroad corridor in the vicinity of the Storytelling Place. Access across the DART right-of-way adjacent to parkland is further discussed in Section E5.4.3 of this document. The LRT project will not restrict or diminish any authorized access to the Storytelling Place.

(iv) The vibration impact from operation of the project substantially impairs the use of a Section 4(f) resource.

There are no structures associated with the Storytelling Place. The design of the LRT will not result in a vibration impact to the Comanche Storytelling Place.

E5.3.4 Findings for Traditional Cultural Properties

The Southeast Corridor light rail project will not require a direct use of the Comanche Storytelling Place in Devon-Anderson Park. The potential effects to the Storytelling Place will be mitigated through planning to minimize harm and a sensitive design that attempts to preserves the existing visual characteristics of the area. On-going coordination with the Comanche Nation will ensure that the design of the LRT alignment will avoid effects to this resource. In a letter dated December 6, 2002, the SHPO determined there will be “no historic properties affected” by the DART project in the vicinity of Devon-Anderson Park.

E5.4 Parklands

Table E3 lists the 14 parklands and one proposed park within the study corridor. There are also two school playgrounds adjacent to the alignment, but these are not subject to Section 4(f).
Table E3  Parklands and Recreation Lands Subject to Section 4(f)

<table>
<thead>
<tr>
<th>Name</th>
<th>Owner</th>
<th>Section 4(f) Direct Use</th>
<th>Section 4(f) Constructive Use</th>
</tr>
</thead>
<tbody>
<tr>
<td>Celebration of Life Park</td>
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<td>No</td>
<td>No</td>
</tr>
<tr>
<td>John W. Carpenter Plaza</td>
<td>City of Dallas</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Fair Park</td>
<td>City of Dallas</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>James Madison High School</td>
<td>Dallas Independent School District</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Liberty Park</td>
<td>City of Dallas</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Pine Park</td>
<td>City of Dallas</td>
<td>No</td>
<td>No</td>
</tr>
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<td>Mildred L. Dunn Recreation Center and Park</td>
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</tr>
<tr>
<td>Lawnview Park</td>
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<td>Silberstein Elementary School</td>
<td>Dallas Independent School District</td>
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<td>Glover Park</td>
<td>City of Dallas</td>
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<td>No</td>
</tr>
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<td>Grover Keeton Golf Course</td>
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<tr>
<td>Gateway Park</td>
<td>City of Dallas</td>
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</tr>
<tr>
<td>Devon-Anderson Park</td>
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<td>No</td>
</tr>
<tr>
<td>Lower White Rock Creek Greenbelt</td>
<td>City of Dallas</td>
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<td>No</td>
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<tr>
<td>Great Trinity Forest Park (proposed)</td>
<td>City of Dallas/State of Texas</td>
<td>No</td>
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</table>

E5.4.1  Direct Use of Parkland

Of the 15 park and recreational lands, only Fair Park would require a direct use of park property. The area of parkland that would be used by the proposed project corresponds directly to the area of historic property identified in Section E5.1.1.1 that lies within the boundary of the Fair Park Historic District/National Historic Landmark (Fair Park HD/NHL). The direct use of the park property that is co-located with the Fair Park HD/NHL would be justified for the same reasons as described in Section E5.1.1.1 of this 4(f) Statement. All other project improvements at Fair Park would occur within areas that are within the overall boundary of Fair Park parklands but are designated for street use. The western boundary of Fair Park parkland (and thus the western edge of the designated street-use area) shifts in several places. At the intersection of Pacific Avenue and Parry Avenue, the boundary lies just to the west of the median in Parry Avenue, or about 55 feet east of the west right-of-way line of Parry Avenue at that intersection. At the south side of the intersection of Parry Avenue and Exposition Avenue, the boundary shifts 95 feet farther west, and then continues southward. The boundary is about 42 feet east of the west right-of-way line of Parry Avenue between Exposition Avenue and First Avenue. Near Second Avenue, it shifts eastward about 50 feet to near the east curb line of R.B. Cullum Boulevard.

The result is an area designated for street use of varying widths that adjoins the Fair Park HD/NHL boundary to the east. Within this designated area, portions of the LRT line and
portions of the LRT station would be placed from south of Pacific Avenue to First Avenue, and portions of the LRT line would be placed South of First Avenue.

**E5.4.2 Temporary Use**
The areas of the Fair Park parkland identified for direct use in Section E5.3.2.1 would also be affected on a temporary basis during construction. Areas that are within the area of parkland designated for street use would also be affected on a temporary basis during construction of the LRT improvements. As noted under the definitions under Section E3.1, such temporary use is not a Section 4(f) use. Conditions to protect adjoining areas of the Fair Park parkland during the construction process will be developed as part of the consultation process.

Of the other 12 parks along the LRT alignment, only the Grover Keeton Golf Course would be likely to be affected during construction. The access road to the golf course crosses the LRT alignment and may need to be closed for brief periods.

**E5.4.3 Constructive Use**
Based on the same discussion as reported in Section E5.1.3, there would not be a constructive use of the Fair Park parklands. None of the other parks along the LRT alignment would be subject to a constructive use. All of the parks exist in an urban environment where the influences of transportation systems are part of their operational and functional characteristics. The alignment uses an existing railroad corridor, which is adjacent to several parks and in two areas, parkland is located on both sides of the alignment. DART owns 100 feet of right-of-way and the LRT alignments would be within this corridor. LRT does not introduce a new barrier since the railroad pre-dates the development of the neighborhoods and parks. The parks have existed adjacent to operating railroad rights-of-way in the past, so the passage of LRT vehicles nearby would not introduce an activity that has not previously existed.

Current access to Grover Keeton is from Jim Miller Road to Grover Keeton Road, which crosses the alignment at-grade. Though there are no formal trails or paths from the neighborhoods to Grover Keeton Park and Gateway Park, residents have indicated that an unimproved gravel driveway from Scyene to a storage/maintenance area north of Grover Keeton Park is used for pedestrian access into the parks. Although the City of Dallas has no formal master plan for Lower White Rock or Devon-Anderson parks, the classification the Park Department has...
assigned to the property governs the use and potential use. The park area is classified as "Conservancy/Linkage," a National Park and Recreation Association (NPRA) recognized classification. The NPRA definition is the protection and management of the natural/cultural environment and use for passive recreation. Recreation use might include viewing and studying of nature/wildlife habitat and nature trails. NPRA does not have any specific acreage or size standards for this classification other than they should be sufficient to protect the resource and provide appropriate usage.

During the DEIS comment period, several persons indicate a perceived constructive use of parkland because of the fencing that would be placed along the alignment near parks. It is DART policy to place fence along areas where DART will operate above 45 miles per hour, in areas where there are decreased sight distances for the train operator, or in areas needed to minimize safety risks to children such as near schools or parks. The purpose of the safety fencing would be to ensure safe access is provided at controlled intersections and to discourage unauthorized use of the right-of-way. The introduction of safety fencing in areas of pedestrian activity and where informal crossings of the alignment are located would impact the ability of persons to cross the alignment at will. Because of the heavily wooded nature of the area which creates limited sight-distance, at-grade crossings of the LRT alignment between the parks will not be allowed to ensure the safety of the public and transit patrons. Except for the two at-grade crossing previously cited, there are no licensed or authorized crossings of the railroad between the parks and persons currently crossing the tracks between the parks are trespassing on DART right-of-way. The Dallas Park and Recreation Department recognizes that DART would be operating within their own right-of-way and that use of the right-of-way for park purposes would require a recreation use license which the city does not have. Because the railroad right-of-way already exists, the Parks Department does not consider its use for LRT creates a constructive use of parkland.

To accommodate access between and into parks along the alignment, three crossings will be included to provide recreational and maintenance access to the parks. Two will be at-grade and one under the LRT. The at-grade crossings at the Grover Keeton Road and the improved gravel driveway from Scyene to a storage/maintenance area north of Grover Keeton Park will remain. A pedestrian under crossing just south of Bruton Road along the creek crossing will be added. The LRT bridge over the stream will be widened and a bench created to provide an
informal, natural passage under the LRT. These crossings have been sited at locations consistent with DART’s safety and design policies.

E5.4.4 Finding for Parklands
A direct use of approximately 0.84 acres of the Fair Park parklands is required for implementation of the proposed project. However, there is no feasible and prudent alternative to the use of the parklands and a process to incorporate all possible planning to minimize harm has been established. Other project improvements would occur within an area of Fair Park parkland that is designated for street use. Despite the direct use of parkland at Fair Park, ongoing coordination with the SHPO and the City of Dallas Parks Department will ensure that the design of the LRT alignment will avoid effects to the property. In a letter dated July 8, 2002, the SHPO recommended that a MOA be developed to address use, design and construction of the LRT Project. This agreement is included in Appendix G of the FEIS. A copy of the July 8, 2002, letter is contained in Attachment E3.

E5.5 Discussion of Planning to Minimize Harm

E5.5.1 Fair Park
DART has undertaken consultation and planning efforts to ensure that the proposed LRT station adjacent to the ceremonial entrance results in minimal harm to the Fair Park HD/NHL. As previously noted, the design of Fair Park in the 1930s (its period of significance for listing as a National Historic Landmark) included trolley service to the ceremonial entrance. The conceptual design of the LRT station has been developed to capture design elements of previously existing ticket booths. DART has consulted with SHPO (under Section 106) on the design of the LRT station to avoid adverse effects to the property. In a letter dated February 20, 2002, SHPO concurred with the proposed design as shown in Figure E.13. This letter is included in Attachment E3.

Portions of all of the types of station elements described above are likely to be placed on property that is within the Fair Park HD/NHL boundary, but outside of the existing ornamental fence at the Ceremonial entrance. The remainders of these elements would be placed in the parkland area reserved for street uses.
At the 1st Avenue signalized crossing into Fair Park, DART has committed to maintaining the lowest possible audible setting for the signal bells to avoid a constructive use to the adjacent Fair Park Music Hall. Additionally, DART has agreed to train whistle ban at this intersection. On-going coordination with Fair Park and the Music Hall may limit this whistle ban to Music Hall events.

The proposed LRT system will alter, without diminishing, access to historic Fair Park. The Washington Street gate along Parry Avenue at the northwest corner of Fair Park will be closed to automobile traffic. This closure will eliminate potential conflicts between automobile traffic and LRT traffic. A new automobile gate will be provided a few hundred feet to the east along Haskell Avenue on the north side of the park. A little used service road and gate at the southeast corner
of the park will be closed for the LRT line. Traffic currently using this road will be internally rerouted within the park.

In an effort to minimize harm of the temporary use of Fair Park during construction, DART will work with Fair Park to schedule construction not to coincide with the major Fair Park events such as the State Fair of Texas.

As previously stated, DART is committed to on-going consultation with the SHPO to assure that adverse effects do not occur to the Fair Park HD/NHL. Although DART will also continue consultation with other interested parties, compliance with Sections 106 and 110 on behalf of FTA is recognized as the overriding standard to assure that harm is minimized.

**E5.5.2 Good-Latimer Tunnel**

DART has undertaken consultation and planning efforts to minimize harm for the Good-Latimer options. Each option would have difference effects and require different actions to minimize harm.

**E5.5.2.1 Option A**

DART has undertaken consultation and planning efforts to minimize harm for the Good-Latimer options. Elimination of the Deep Ellum Station would not eliminate the impacts to the tunnel. Engineering studies have determined the tunnel is not structurally capable of sustaining the weight of LRT facilities (either line sections or the proposed station).

Under Option A, razing the tunnel and filling in the area would mean the loss of the tunnel. However, Option A would not require the direct or constructive use of two other properties – the St. James AME Temple and the Knights of Pythias Temple. DART proposes that the adverse effect of physical destruction of the Good-Latimer Tunnel will be mitigated through documentation. The documentation for the Good-Latimer Underpass shall be prepared in accordance with the Historic American Engineering Record (HAER) Level I. This documentation will include measured drawings depicting existing and historic conditions, photographs with large-format negatives of interior and exterior views and a written narrative that places the tunnel and remaining system elements in the context of the community.
development of Dallas. DART is committed to continue coordination efforts with the SHPO to ensure that the appropriate measures are achieved.

One of the features of the Good-Latimer Tunnel, although it does not contribute to the historic designation of the facility, is a role the tunnel entry walls provide as a venue for murals. Many community members consider this mural space, and its role in creating a gateway entry to the Deep Ellum area, an important asset. Although technically it would not reduce harm to the Section 4(f) resource, the DART Board of Directors has allocated $1.5 million for the creation of a new Deep Ellum Gateway if Option A is selected. DART would work with the community to develop a gateway design that is sensitive to the area. Additionally, if practicable, DART will attempt to retain significant pieces of the tunnel fabric for placement in a local and public setting with appropriate interpretation.

These mitigation measures were recommended in an August 15, 2002, letter from a coalition of preservationists and Deep Ellum stakeholders which included Preservation Dallas, Meadows Foundation of Texas, Deep Ellum Association, and the Friends of Fair Park. A copy of this letter is contained in Attachment E3.

E5.5.2.2 Option B

Although Option B has been designed to be an avoidance alternative to filling in the Good-Latimer Tunnel, it also has significant impacts. These impacts cannot be reduced without compromising DART design and safety standards, station requirements, or City of Dallas traffic requirements. Any action of this type would severely impair DART ability to operate or would further exacerbate area traffic and circulation problems.

Option B includes an aerial structure to cross over the southern entry into the tunnel. Using single columns where feasible to support the aerial structure would minimize its appearance and help reduce visual impacts in the tunnel. The alignment has been developed to minimize impacts to the Knights of Pythias Temple but still place an elevated LRT structure near the building which would distract from the character of the property.

Additionally, in order to serve the Deep Ellum community, a pedestrian way has been designed that utilizes property historically associated with the National Register-eligible Knights of Pythias.
Temple. This would constitute a direct use of the property. Elimination of this pedestrian way would severely impair DART’s ability to serve the area and station. The Deep Ellum Station would serve as a destination station and would not include parking, drop-off, or bus transfer facilities. This means the primary access to the station will be by walking. Because of the many concerns associate with the tunnel, including safety and ADA requirements, DART will not consider use of the tunnel for pedestrian access.

Elimination of the Deep Ellum Station could reduce impacts to the Knights of Pythias. However, this would not meet the goals and objectives for the project. There is high demand for the Deep Ellum Station which would be within walking distance of the Wilson Historic District, over 20 non-profit organizations, the Latino Cultural Center, the Deep Ellum Entertainment District, the Dallas CBD, and hundreds of residential units.

E5.5.2.3 Option C
Like Option B, Option C is an avoidance alternative to filling in the Good-Latimer Tunnel that has significant impacts. These impacts cannot be reduced without compromising DART design and safety standards, station requirements, or City of Dallas traffic requirements. Any action of this type would severely impair DART ability to operate or would further exacerbate area traffic and circulation problems.

For Option C, efforts to reduce harm have focused on ensuring minimal incursion onto the St. James AME Temple site at 624 N. Good-Latimer. Under Option C, the LRT alignment would be shifted to the east in order to align with an LRT station on the east side of Good-Latimer, just south of Swiss Avenue. This shift requires crossing the southwest corner of the property. The alignment has been developed to minimize impacts to the property. However, due to the space requirements for the station and LRT design requirements, the transition to the east side of Good-Latimer would impact the parking areas and access to the St. James AME Temple. This property is individually eligible for listing on the NRHP and the impact to property and access would be considered both a direct impact and constructive use.

Elimination of the Deep Ellum Station could reduce impacts to St. James AME Temple. However, this would not meet the goals and objectives for the project. There is high demand for the Deep Ellum Station which would be within walking distance of the Wilson Historic District,
over 20 non-profit organizations, the Latino Cultural Center, the Meadows Foundation of Texas, the Deep Ellum Entertainment District, the Dallas CBD, and hundreds of residential units.

E5.5.3 Comanche Storytelling Place
DART has consulted with the Comanche Nation regarding the Storytelling Place and scenic overlook. This consultation included discussions and mitigation measures to ensure the project will not affect the site. Although considered by the Comanche People as part of an overall cultural landscape, the area of primary importance is the limestone outcropping of rock that forms a bowl-shaped configuration that is luminescent in the moonlight. This area is outside of the DART right-of-way and will not be directly impacted by the construction of the LRT.

As stated previously, the design will cut into the face of the escarpment that extends into the right-of-way and put up a retaining wall. Because of the importance of the natural limestone outcropping at the Storytelling Place, as requested by the Comanche Nation, DART will construct the retaining wall of limestone in order to blend in with the natural setting. Additionally, DART will eliminate the fence along the right-of-way line at top of the escarpment and the retaining wall be extended to height that preserves the view and meets DART safety requirements.

Other mitigation that DART has committed to at this location is that the fence, from Station 504+00 to Station 508+00, opposite the Storytelling Place will coated in a black vinyl material to blend in with the background. Catenary poles will be spaced as far from the view from the escarpment as practically possible. Catenary poles, if practical, will also be kept to a minimum height. Additionally, the archeological survey of the corridor will be provided to the Comanche Nation for their efforts for National District recognition.

E5.5.4 Parkland
As stated previously, two at-grade crossings and one pedestrian underpass of the LRT will be included in the design to accommodate access between and into parks along the alignment. These crossings have been sited at locations consistent with DART’s safety and design policies.

Current Federal Railroad Administration (FRA) rules preclude such the concept of a whistle ban at the two at-grade crossings adjacent to Grover Keeton Park where DART will share right-of-
way with freight operations. The noise and vibration analysis prepared for the LRT system indicated that marginal exceedance of impact threshold would affect only a portion of the green at hole No. 1 at the Grover Keeton Golf Course. This type and level of impact to a very small portion of the overall parkland would not be a substantial constructive use.

In consideration of these two at-grade crossings, DART has been tracking the proposed FRA Rule on the Use of Locomotive Horns. This proposed rule would implement a statutory requirement that locomotive horns sound at each rail grade crossing unless certain exceptions are met. While DART prefers the safety afforded by the whistle, these intersections will be designed with unmountable median barriers so as not to preclude the community seeking to establish quiet zones in the future.

E5.6 Agency Consultation and Roles

As the federal lead agency/grantor for the proposed project, the FTA is legally responsible for compliance with the National Historic Preservation Act (NHPA) and Section 4(f) of the Transportation Act. All activities conducted by DART are on behalf of, and subject to approval of, the FTA.

E5.6.1 Fair Park

DART has undertaken and continues consultation with agencies with regulatory purview over the Section 4(f) resources in the corridor. These agencies are the City of Dallas Parks and Recreation Department, SHPO, and the National Park Service. The City of Dallas is the owner of Fair Park. The SHPO has administrative responsibilities over the resources of the park listed in the NRHP. These administrative responsibilities include Section 106 of the NHPA and the Texas Antiquities Code. Section 106 requires that every federal agency “take into account” the undertaking’s effects on historic properties; this occurs through a consultation process with the SHPO. As a National Historic Landmark, Fair Park is under the administrative responsibility of the National Park Service with regard to Section 110 of the NHPA. Section 110 requires that the responsible federal agency assume responsibility for the preservation of historic properties they own or control and, to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to any National Historic Landmark.
DART understands and is committed to agency consultation throughout the remainder of the project development process in order to fulfill all the responsibilities and processes of Section 4(f) of the Transportation Act, Sections 106 and 110 of the NHPA, and Chapter 26 of the Texas Parks and Wildlife Code. This consultation will assure that the on-going design refinement process continues to avoid impacts to the parks and historic resources along the alignment.

Consultation has also taken place with groups that have an interest in these resources, including the City of Dallas Landmark Commission, City of Dallas Park and Recreation Board, City of Dallas Urban Design Advisory Committee, entities with facilities on the Fair Park campus, Friends of Fair Park, Preservation Dallas, and the community. Appendix C of the DEIS includes a list of meetings and presentations for both the MIS and PE/EIS and coordination meetings with other agencies.

**E5.6.2 Good-Latimer Tunnel**
The SHPO has determined that the tunnel is eligible for listing in the NRHP. The tunnel is subject to use (razing and bringing the roadway up to grade with surrounding properties) under the primary LRT alignment. DART has undertaken consultation with organizations that are concerned about potential impacts to the Good-Latimer Tunnel. Among these are the City of Dallas, Dallas Landmark Commission, Deep Ellum Association, Deep Ellum Foundation, Preservation Dallas, the Meadows Foundation, and nearby property owners and residents. Appendix C of the DEIS includes a list of meetings and presentations for both the MIS and PE/EIS and coordination meetings with other agencies. Additionally, Attachment E2 includes copies of correspondence from these parties, comments received during the public hearings held in March 2002, as well as a copy of an editorial from *The Dallas Morning News* supporting filling in the tunnel. Of the verbal and written comments received, the overwhelming majority of people supported filling in the tunnel.

**E5.6.3 Comanche Storytelling Place**
Since the Storytelling Place was identified in April 2002, DART has undertaken and continues consultation with the Comanche Nation. On August 12, 2002, representatives of FTA, SHPO, DART, the Comanche Nation, and local environmental groups met at the Storytelling Place to discuss impacts of the DART LRT Project. As detailed in E5.5.3, DART has worked with the Comanche Nation in the development of plans to minimize harm to the Storytelling Place. In the
future, the Comanche Nation will be given the opportunity to review all plans that may potentially impact this site.

E6.0 Conclusions
Assuming the selection of Good-Latimer Alignment A, two uses of Section 4(f) properties will be associated with the construction of the Southeast Corridor LRT line. The razing of the Good-Latimer Tunnel constitutes a direct use of this Nation Register of Historic Places eligible structure. At Fair Park, the LRT line and system elements will be placed within the boundary of protected parkland and the Fair Park HD/NHL. This also constitutes a direct use of this Section 4(f) property. This Section 4(f) Statement demonstrates that there is no feasible and prudent alternative to the use of these two Section 4(f) properties. The proposed Southeast Corridor alignment has been strongly supported by the City of Dallas, local stakeholders, and the public. Measures to minimize harm have been incorporated into the planning process. The use of the Good-Latimer Tunnel will be mitigated through documentation while the use of Fair Park will be mitigated through a sensitive design that captures previously existing elements of the historic park. Coordination and consultation between FTA, DART, SHPO, City of Dallas, and the National Park Service is on-going.

FTA and DART recognize the Comanche Storytelling Place as a unique resource along the Southeast Corridor LRT line that is potentially eligible for the NRHP as a Traditional Cultural Resource. The potential effects of the LRT line on this resource will be mitigated through a sensitive design that has been approved by the Comanche Nation.
ATTACHMENT E1
HISTORIC RESOURCES SURVEY
Supplemental Request for Determination of Eligibility

for the

SOUTHEAST CORRIDOR LIGHT RAIL TRANSIT PROJECT

City of Dallas, Dallas County, Texas
November 2001

Prepared For:
Federal Lead Agency:
Federal Transit Administration
Applicant:
Dallas Area Rapid Transit (DART)
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Introduction
The Federal Transit Administration (FTA) has determined that the proposed DART Southeast Light Rail Transit Project (DART SE LRT) in Dallas, Texas, is an undertaking as defined in 36 CFR §800.16(y) because it has the potential to cause effects on historic properties and, therefore, requires compliance with Section 106 of the National Historic Preservation Act as amended (Section 106, 16 U.S.C. 470f) and its implementing regulations (36 CFR Part 800). This Request for Determination of Eligibility Report is being prepared to seek the concurrence of the SHPO with the identification of properties that may be eligible for inclusion in the National Register of Historic Places.

Project Description
On May 9, 2000, after an extensive Major Investment Study of the Southeast Corridor, the DART Board of Directors approved the staff recommendation to extend the existing light rail alignment from the Dallas Central Business District through South Dallas/Fair Park, Grover Keeton Golf Course and to terminate at Elam Road and Buckner Boulevard in Pleasant Grove. DART SE LRT involves construction of a light rail transit line within the existing street and freight railroad right-of-way, in part along a route that historically contained streetcar service.

Build Alternative
The alignment of the proposed Build Alternative follows Bryan Street east from the existing Pearl Street Station under North Central Expressway to Good-Latimer Expressway. At Good-Latimer, the alignment turns and follows the roadway until just south of Gaston Avenue. It then turns eastward and follows the former Union Pacific Railroad (UP RR) right-of-way to Haskell Avenue where it turns southwest and parallel to Parry Avenue and the west side of Fair Park, passing by the National Women’s Museum and the Music Hall. The alignment then turns to the southeast to the former Southern Pacific Railroad (SP RR) parallel to Trunk Avenue, where it remains within the former SP RR right-of-way until just west of Second Avenue. The alignment continues to use the former SP RR right-of-way, which parallels Scyene Road, then turns south through the Grover Keeton Golf Course. The alignment crosses Lake June Road and turns southeast roughly parallel to US 175 to Elam Road at Buckner Boulevard. (See Figure 1.)
Figure 1: DART Southeast Study Area

[Map of DART Southeast Study Area with TC labeled as Future Transit Center and Railroad indicated]
Good-Latimer Area

Currently, Good-Latimer Expressway goes under Gaston Avenue via a 300-foot long tunnel. The tunnel was originally constructed in 1930 to facilitate the flow of traffic under the congested tracks of the Houston & Texas Central (H&TC) Railroad (Dallas Landmark Commission Landmark Nomination Form, Deep Ellum, prepared October 25, 1995 by the Research & Media Group.). As described previously, the proposed DART SE LRT alignment follows Good-Latimer and then turns onto the former UP RR. The existing tunnel cannot be used for light rail transit. The tunnel has not been maintained properly, is deteriorating, and cannot support the weight of light rail transit. Other concerns include frequent flooding of the tunnel, poor lighting, and the perceived safety of pedestrians (transit users). To the community, the tunnel represents a local landmark and a [geographical, but not historical] gateway to the Deep Ellum area. Local artists through an art program decorate the retaining walls. Because of the potential engineering and social impacts in the area, two options have been developed to transition from Good-Latimer to the former UP RR. The options have been designated Good-Latimer Option A and Good-Latimer Option B and are shown on Figures 2 and 3, respectively.

Good-Latimer Option A

This LRT alignment option would follow the median of Good-Latimer and then cross the northbound lanes of Good-Latimer. It would require filling in the existing tunnel to bring the travel lanes of Good-Latimer to the same level as Gaston Avenue and the surrounding properties.
Good-Latimer Option B

This option would allow the existing tunnel to stay in place by shifting the DART SE LRT alignment to the west. This alignment option would also require the construction of a new one-way street west of the DART SE LRT to allow access to adjacent properties.
Identification Effort

Section 106 of the National Historic Preservation Act of 1966, as amended, requires that federal agencies take into account the effects of their projects on properties in or eligible for inclusion in the National Register of Historic Places. In accordance with this law and with the guidelines for its implementation promulgated by the ACHP, the FTA and DART have undertaken an affirmative search and analysis of archaeological, historic, and architectural resources that could be affected by this project. Among the first steps in this process, is the identification of the Area of Potential Effects.

Area of Potential Effects

As defined in the Section 106 guidelines, the Area of Potential Effects (APE) means “the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects cause by the undertaking” [36 CFR §800.16(d)].

The APE definition for the DART SE Light Rail is shown in the box below.

Area of Potential Effects Definition

The APE for archaeological resources includes any ground area that would be disturbed by excavation, grading, or construction.

The APE for architectural and historical resources includes the parcels within and adjacent to the DART Southeast Corridor Light Rail Transit Project alignment, parcels containing and adjacent to transfer power substations, and parcels within a reasonable view shed of aerial structures.

The APE boundary was mapped based on an application of the above definition to the conceptual-preliminary engineering available for DART SE Light Rail at the time of this DER.

The APE map is included in this DER as Appendix A.
Records Search

The determination of eligible historic and archaeological sites is a major component of Section 106 related research. Since eligibility for inclusion in the National Register is dependent on four distinct criteria, proper evaluation also involves extensive site specific archival research concentrating in the areas of architectural, historical and archaeological significance. Taking the results of the record search into account, subsequent field studies focus upon the identification of properties which have retained substantial integrity of their historic fabric, and could be considered for inclusion in the National Register.

Archaeological Resources

The majority of the DART SE LRT would be constructed in the existing street or railroad right-of-way. Because of the relatively small areas of previously undisturbed ground that would be affected by construction, a more detailed analysis of archaeological resources, including the results of Native American coordination, will be submitted under separate cover. The following analysis was prepared by AR Consultants of Dallas for the DART SE LRT.

The preferred alternative crosses the White Rock Creek and Elam Creek floodplains, areas where archaeological sites have been previously been recorded more than half a century ago by members of the Dallas Archeological Society (DAS). The floodplains were considered to be areas of high archaeological potential in the 1978 Dallas Archaeological Potential report, but subsequent investigations in the area have since reassessed the potential as being medium, although with some areas of high potential such as the area of the White Rock Lake Spillway site.

Archaeological resources have not been recorded within any of the studied alternatives, but previous DAS archaeological surveys and investigations in conjunction with development projects over the past twenty years have recorded prehistoric archaeological sites in the area. More specifically, five prehistoric sites have been recorded near the route and adjacent to White Rock Creek, both in the floodplain and in the nearby uplands. Two of these sites are described as being located on the bluff overlooking the creek and being immediately adjacent to the route of
the preferred alternative between Scyene Road and Burton Road. Other sites have been recorded as being on a ridge next to the creek bank and in the floodplain near a flowing spring. Sites have also been recorded downstream from the crossing of Elam Creek. Artifacts from these sites include arrow points, Caddoan pottery, lithic debris, and mussel shells. These sites were recently reevaluated by the DAS and two were determined to be intact, while one of the sites has been completely destroyed since it was recorded more than fifty years ago.

**Historic Buildings and Structures**

DART reviewed existing information on historic buildings and structures within the area of potential effects, by undertaking a records search to determine the proximity of previously documented historic and architectural resources to the project and to help establish a context for resource significance. National, state and local inventories of architectural/historic resources were examined in order to update this previous information, and identify significant local historical events and personages, development patterns, and unique interpretations of architectural styles. The following inventories and sources were consulted:

- The National Register of Historic Places, National Register Information System, updated through August 2001;
- Registered Texas Historical Landmarks;
- Texas Historic Engineering Site Inventory;
- Texas Historical Commission, Texas Historical Site Atlas, http://atlas.thc.state.tx.us
- City of Dallas' Landmarks

**National Register Criteria for Evaluation**

In order to evaluate the historic significance of a property, the National Register of Historic Places criteria for evaluation, set forth in 36 CFR Part 60.4, must be applied, as follows:

*The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and*
(a) That are associated with events that have made a significant contribution to the broad patterns of our history; or

(b) That are associated with the lives of persons significant in our past; or

(c) That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

(d) That have yielded, or may be likely to yield, information important in prehistory or history.

Among other criteria considerations, a property which has achieved significance within the last 50 years is not considered eligible for inclusion in the National Register unless certain exceptional conditions are met. The 50-year age criterion for the DART SE Light Rail has been set at 1953, which is 50 years before 2003, the year its major construction effects are anticipated to end.

The National Register Criteria are written broadly to recognize the wide variety of historic properties associated with our prehistory and history. To help agencies make reliable decisions of significance, the National Register Branch of the National Park Service has developed additional guidelines, including National Register Bulletin 15, entitled How to Apply the National Register Criteria for Evaluation, which states:

For a property to qualify for the National Register it must meet one of the National Register Criteria for Evaluation by: being associated with an important historic context and retaining historic integrity of those features necessary to convey its significance.

**Historical Context**

The historic context serves as the framework within which the National Register Criteria are applied. A building or structure must possess significance in American history, architecture, engineering, or culture when evaluated within the historic context of a relevant geographic area. An historic context illustrates significance according to themes, periods of significance, property types and geographic area. The following section is intended to help establish a context for
evaluating National Register significance for properties located within the Area of Potential Effects. Known examples of a specific property type or architectural style are often indicated for reference purposes, but this is not intended to be a complete listing.

**Founding and Early Development of Dallas**

Dallas is on the Trinity River in the center of Dallas County in North Central Texas. The city was founded by John Neely Bryan, who settled on the east bank of the Trinity near a natural ford in November 1841. The ford, at the intersection of two major Indian traces, provided the only good crossing point for miles. Two highways proposed by the Republic of Texas soon converged nearby, increasing the desirability of the site as a location to settle. In addition, Bryan had unknowingly settled on land granted by the republic to the Texan Land and Emigration Company of St. Louis, headed by William S. Peters. Bryan eventually legalized his claim, and the extensive promotional efforts of the Peters colony attracted other settlers to the region.

In 1844, J. P. Dumas surveyed and laid out a town site comprising a half-mile square of blocks and streets. The origin of the name Dallas although speculation points out that prominent personages of that time included George Mifflin Dallas, vice president of the United States from 1845-49, his brother, Commodore Alexander J. Dallas, United States Navy; and Joseph Dallas, who settled near the new town in 1843. Dallas County was formed in 1846, and Dallas was designated as the temporary county seat. In 1850, voters selected it as the permanent county seat. The Texas legislature granted Dallas a town charter on February 2, 1856, Dr. Samuel Pryor, elected the first mayor, headed a town government consisting of six aldermen, a treasurer-recorder, and a constable.

Dallas quickly became a service center for the rural area surrounding it. By the 1850s, it had dry-goods stores, groceries, a drugstore, an insurance agency, a boot and shoe shop, brickyards and saddle shops, as well as a weekly newspaper, the *Dallas Herald*, founded in 1849. In 1852, French immigrant Maxime Guillot established the first factory, manufacturing carriages and wagons. Alexander and Sarah Horton Cockrell, who purchased Bryan's remaining interest in the town site for $7,000 in 1852, built a three-story brick hotel, a steam sawmill, and a flour mill.

With the breakup of the nearby La Réunion colony in the late 1850s, skilled European craftsmen
and artists moved into Dallas, including brickmakers, cabinetmakers, tailors, milliners, brewers, and musicians. By 1860, the population was 678, including ninety-seven African Americans as well as French, Belgians, Swiss, and Germans.

On July 8, 1860, a fire originating in the W. W. Peak Brothers Drugstore spread to the other buildings on the town square and destroyed most of the businesses. Suspicion fell on slaves and Northern abolitionists, and as a result three slaves were hanged and two Iowan preachers were whipped and run out of town.

In 1861, Dallas voters voted 741 to 237 to secede from the Union. Dallas was selected as one of eleven quartermaster and commissary posts in Texas for the Trans-Mississippi Army of the Confederacy. After the war, freed slaves flocked to Dallas in search of jobs and settled in freedmen's towns on the periphery of the city. By 1870, the population was about 3,000.

**Transportation and Commerce**

The key to economic expansion in Dallas had always been better transportation in and out of the attempts to navigate the Trinity River had proved impractical. Dallas businessmen turned their attention to securing rail service and succeeded in attracting the Houston and Texas Central in 1872 and the Texas and Pacific in 1873, making Dallas one of the first rail crossroads in Texas. By 1885, there were five railroad lines in Dallas, making Dallas a hub in the growing transcontinental transportation system.

Like Atlanta, Dallas found itself in a strategic geographical location for the transport of abundant regional products to northern and eastern manufacturing plants. Cotton became the region's principal cash crop, and Elm Street in Dallas was its market. Dallas became the world center for the leather and buffalo-hide trade. Merchants who opened general stores along the railroad route as rail construction crept north settled in Dallas and founded their flagship stores there. By 1880, the population had more than tripled, to 10,385.
During the last quarter of the nineteenth century, banking and insurance emerged as major industries under the leadership of such men as William Henry Gaston, William L. Cabell, and J. T. Trezevant. With their close involvement in civic affairs, Dallas businessmen launched the State Fair of Texas, organized a board of trade, and founded a merchants exchange to promote the city's favorable business climate. Dallas acquired telephones (1881), electricity (1882), and several daily newspapers, principally the *Dallas Morning News* (1885) and the *Dallas Times Herald* (1888).

As was appropriate in a growing metropolis, in the early 1870s streetcar service joined the rail lines in serving the citizens of Dallas. In 1873, the first streetcar line was added heading north of downtown. In 1889, this mode of transit was given a further boost as electrification began to be added to Dallas' streetcar lines. Low cost transportation helped the city grow, as real estate developers scrambled to fulfill the middle class' dream of a freestanding residence on a piece of land convenient to transportation but out of the bustle of downtown. By the 1920s and 1930s, multiple trolley lines were serving downtown Dallas and the areas along the proposed DART SE alignment, including those of the Texas Electric Railway.

After annexing the neighboring town of East Dallas on January 1, 1890, Dallas ranked as the most populous city in Texas in 1890, with 38,067 residents. Three years later, in the wake of a national financial panic, five Dallas banks and several industries failed. Cotton prices dropped to less than five cents a pound. Only sixty-two new manufacturing firms were established in Dallas during the 1890s. The panic also affected unionized labor, which had just begun to organize. The American Federation of Labor granted a charter to the Trades Assembly of Dallas in 1899. Among its early causes was championship of the eight-hour workday and legislation outlawing the firing of union members.

**Twentieth Century Growth and Expansion**

By the turn of the century, the economy had recovered, and Dallas was the leading book, drug, jewelry, and wholesale liquor market in the Southwest. It was the world's leading inland cotton market, and it still led the world in manufacture of saddlery and cotton-gin machinery. Its
population stood at 42,638. In 1905, businessmen formed the 150,000 Club, aimed at increasing the city's population to 150,000 by 1910. Although the numerical goal was not met until 1920, the population did increase to 92,104 by 1910, and the city doubled in area to 18.31 square miles, partly through annexation of Oak Cliff in 1904. Dallas built its first steel skyscraper, the fifteen-story Praetorian Building, in 1907.

In the second decade of the twentieth century, Dallas began to implement the city plan commissioned from George E. Kessler after a disastrous flood in 1908. Oak Cliff and Dallas were connected by the Houston Street Viaduct, at the time the longest concrete structure in the world; the Union Terminal Company consolidated six downtown railroad depots; and the railroad tracks were removed from Pacific Avenue. Dallas was selected as the site for a Federal Reserve Bank in 1914, and Ford opened an auto assembly plant in the city. A wave of immigrants from Mexico helped swell the population to 158,976 by 1920, when Dallas ranked as the forty-second-largest city in the nation.

The post-World War I era was marked by the reemergence of the Ku Klux Klan. With 13,000 members, the Dallas chapter was the largest in Texas, and the national "imperial wizard" was a cut-rate dentist from Dallas named Hiram Wesley Evans. Some 75,000 citizens greeted Evans on "Klan Day" at the 1923 State Fair. The Dallas Morning News led the attack on the Klan, helping Ma (Miriam A.) Ferguson defeat Dallas judge Felix Robertson, the Klan candidate, in a Democratic runoff for governor in 1925.

Dallas women had been in the forefront of movements in Texas for reform in child-welfare practices, pure food and drink legislation, sanitation, and other causes. By 1920, they were also entering the workforce in increasing numbers. In 1927, the local chapter of the National Association of Business and Professional Women estimated that there were 15,000 women working in 125 occupations, trades, and professions in Dallas. Dallas was also a major center for the textile industry, which employed many women as dressmakers. Minority businessmen also began to organize. The Dallas Negro Chamber of Commerce (later re-named the Dallas Black
Chamber of Commerce) was organized in 1925, and the Mexican Chamber of Commerce (now the Hispanic Chamber of Commerce) was formed in 1940.

The Great Depression put 15,000 Dallasites on the relief rolls by 1933, and retail sales and bank deposits plummeted. The population, which had soared to 260,475 by 1930, climbed only to 294,734 in 1940. The pain of the depression was eased somewhat for Dallas by the discovery of oil in East Texas in 1930. Dallas bankers such as Nathan Adams of the First National Bank were the first in the nation to conceive of the idea of lending money to oil companies using oil reserves in the ground for collateral. Dallas soon became a center for petroleum financing.

In a massive engineering effort begun in 1930, the channel of the Trinity River was moved, straightened, and confined between levees to prevent future flooding. Dallas businessmen also succeeded in making Fair Park the site of the Texas Centennial celebration, thus providing work for local builders, contractors, advertisers, concessionaires, and construction workers. The city played host to ten million visitors, including President Franklin D. Roosevelt.

One of the premier suburbs in Texas, Highland Park, developed within Dallas during the early part of the twentieth century. In it was built the first large-scale shopping center in the nation, Highland Park Village, in 1931. Highland Park incorporated, and its battles with Dallas over annexation lasted into the 1940s.

Until World War II, Dallas ranked as a minor manufacturing center in the nation. Its three leading industries were food processing, apparel manufacturing, and printing and publishing. Then war-related industries, such as North American Aviation, pushed industrial employment in Dallas to more than 75,000 in 1944. Dallas businesses experienced a boom after World War II comparable to that following the coming of the railroads. In 1949, five new businesses opened each day and thirteen new manufacturing plants opened every month. In 1950, the population stood at 434,462. During the 1950s and 1960s, Dallas became the nation's third-largest technology center, with the growth of such companies as Ling-Temco-Vought (LTV Corporation) and Texas Instruments. In 1957 two developers, Trammell Crow and John M.
Stemmous opened a Home Furnishings Mart that grew into the Dallas Market Center, the largest wholesale trade complex in the world. The opening of Dallas-Fort Worth International Airport in 1974 attracted numerous corporate headquarters to Dallas and consolidating the city's reputation as a national financial and business center. The population grew from 679,684 in 1960 to 844,401 in 1970, and from 904,078 in 1980 to 1,006,877 in 1990. The 1990 census reported the ethnic groups in the city as white, 47.67 percent; black, 28.88 percent; Hispanic, 20.88 percent; Asian, 2.18 percent; and American Indian, .48 percent. Racial integration of public facilities began on August 15, 1961, when a carefully orchestrated plan sent African Americans to lunch counters and businesses throughout the city for equal service. This plan, which proceeded without incident, was the work of a biracial committee appointed by the Dallas and Negro chambers of commerce, which devised a publicity campaign and notified business owners in advance. Integration of the public schools proceeded more slowly, and the school district remained under court supervision into 2001.

Dallas suffered its most traumatic experience on November 22, 1963, when President John F. Kennedy was assassinated while riding in a motorcade through Dealey Plaza, only yards from the site where John Neely Bryan had settled in 1841. Two days later, his alleged assassin, Lee Harvey Oswald, was killed before television cameras by a Dallas nightclub owner, Jack Ruby. In 1989, after twenty-five years of debate about how the city should commemorate the event, the Sixth Floor, a museum, opened in the former Texas School Book Depository. In 1993, Dealey Plaza was declared a National Historic Landmark District, the city's second after Fair Park.

**Ecclesiastical History**

The religious composition of the city has changed considerably over the years. Early Protestant settlers looked to traveling missionaries for religious services. The first Episcopal parish was organized in 1856. Catholics celebrated the first Mass in Dallas in 1859. Permanent places of worship were built as the city began to grow: Lamar Street Methodist (later First Methodist), City Temple Presbyterian, and First Baptist, all in 1868. Early black churches included Bethel African Methodist Episcopal (1869-72), New Hope Baptist (1872), and St. Paul Methodist (1873). The first Jewish synagogue, Temple Emanu-El, was built in 1873, and the first Catholic
parish was established in 1872, when Dallas was still in the Diocese of Galveston. Congregationalists organized in 1875, Seventh Day Adventists in 1876, Lutherans in 1878, Unitarians in 1889, Christian Scientists in 1894, and Mormons in 1897. The variety of communions helped to make Dallas a religious stronghold by the turn of the century, and the continued growth of churches marked Dallas as a city of churchgoers. In the early 1980s, Dallas had six churches among the nation’s 100 largest: First Baptist, Lovers Lane United Methodist, Cliff Temple Baptist, Beverly Hills Baptist, First United Methodist, and East Grand Baptist. Three more on the list were in suburbs: Highland Park United Methodist, Highland Park Presbyterian, and Park Cities Baptist. Subsequently, as the population has diversified, so have the religious faiths. Buddhists, Eastern Orthodox, Hindus, Muslims, and Sikhs are now found in Dallas. Southern Baptists have the largest representation in the Dallas area, followed by Catholics, black Baptists, and United Methodists.

Art and Music

The Art Saloon of Adolph Gouhenant (actually a photograph gallery), located on the south side of the courthouse square in the 1850s, was an early expression of artistic interest in Dallas. An 1857 diary reference to a visit "to the court house to look at the paintings of the Hudson scholars" may mark the earliest art exhibit in Dallas. Art shows at the annual state fairs after 1886 exposed the public to art, while plans for the Carnegie Library, which opened in 1901, included an upstairs art gallery. The success of early shows there, which featured such regional artists as Frank (Charles F.) Reaugh and Edward G. Eisenlohr led to the organization of the Dallas Art Association, which began assembling a permanent collection. After several moves and name changes, the Dallas Museum of Art now occupies a building designed by Edward Larrabee Barnes in the Dallas Arts District. By 1873, Dallas had a theater, Field's Opera House, where the first performance of an opera in the city took place in February 1875. The influx of German immigrants with the railroads led to the formation of the Dallas Frohsinn, a male singing society and member of the Texas State Sängerbund, which hosted statewide singing meets in 1883, 1892, 1904, and 1914. The Dallas Symphony Orchestra traces its roots to performances in 1900, and the Dallas Opera was launched in 1957. By the early 1920s, Dallas was home to one of the earliest radio stations in Texas, WFAA.
During the 1920s and 1930s, popular music was centered in the Deep Ellum district on the eastern edge of downtown, close to one of Dallas's original freedmen's towns. Major black jazz and blues musicians such as Huddie "Leadbelly" Ledbetter and Blind Lemon Jefferson performed at Ella B. Moore's Park Theater, Hattie Burleson's dance hall, and other local clubs. To quote the 1940 WPA Guide to Texas, "Deep Ellum, Elm St. between Preston and Good Sts, ... lies along both sides of Elm Street, with the section surrounding it for about two blocks north and south ... It had its beginning in Freedman's Town, a settlement of freed slaves, in 1865. In its mart of secondhand stores, pawn shops, cafes and poolrooms, automobile graveyards and parts stores, it is possible to buy anything from a threadbare cloth-of-gold evening gown to a folding bathtub ... Pitchmen hawk their wares, while in the street frenzied evangelists exhort, often unnoticed ... At dusk the district begins to vibrate, and along Negro Dallas' great white way the Grand Lodge of the Knights of Pythias, Colored, looms above the Harlem movie house, cafes, pool halls, and Gypsy Tea Room...”

Today Dallas has a wide variety of popular music and entertainment venues including the Summer Musicals, Starplex, and productions by the Dallas Jazz Orchestra, the Classical Guitar Society, the Dallas Chamber Orchestra, the Dallas Black Dance Theater, and the U.S.A. Film Festival. Dramatic productions in the nineteenth century were available as early as 1872 in Thompson's Variety Theater. The Little Theater of Dallas was established in 1921 & won the national Belasco Cup several times; it was followed by such other companies as the Civic Theater, the New Theater League of Dallas, and the critically acclaimed Margo (Margaret Virginia) Jones company. The Dallas Theater Center was founded in 1955 and is housed in a building on Turtle Creek designed by Frank Lloyd Wright. Other groups include Theatre Three, Teatro Dallas, the Dallas Children's Theater, and the Dallas Shakespeare Festival.

**Educational Institutions**

Educational institutions have been present in Dallas since its earliest years. Private schools and academies preceded the founding of the public school system in 1884. The present Dallas Independent School District, with more than 130,000 students, is the eighth largest school district in the nation. Charles McDaniel Rosser, M.D., a young physician founded the first medical
school in Dallas in 1900 and it was renamed Baylor College of Medicine in 1902. Institutions of higher learning include Southern Methodist University, founded in 1911; Paul Quinn College, a formerly black private institution that moved from Waco in 1990; Bishop College, another historically black institution founded in Marshall in 1881; and the University of Texas Southwestern Medical School, founded in 1943. Several campuses of Dallas County Community College, established in 1965, are located within the city.

Sports

Sporting events and teams in Dallas have their roots in the nineteenth century, when horse racing was popular enough to support a Dallas Jockey Club, founded in 1869. Horse racing was a major attraction at the State Fair of Texas from 1886 until 1909. The national bicycling craze inspired the formation of the Dallas Wheel Club in 1886, and races were held at Cycle Park from its construction in 1896 until its conversion to an open-air theater. Baseball was played in Dallas as early as 1877, when a touring team played a local team. By 1882, Dallas had its first semiprofessional team, the Brown Stockings, which won the league championship in 1883 and 1884. The Dallas Hams, a professional team, won the Texas League pennant in 1888; Dallas continued to field minor league teams until 1970. Football made its first appearance in Dallas with the organization of a Dallas Football Club in 1891. A team formed at Dallas High School in 1900 is thought to have been the first high school team in Texas. SMU sent a team to the 1935 Rose Bowl, and Doak Walker drew crowds to the Cotton Bowl in the late 1940s. Two professional teams, the Dallas Cowboys and the Dallas Texans, competed for fans in the early 1960s, until owner Lamar Hunt moved the Texans to Kansas City in 1963. The Dallas Cowboys (who now play in Irving) won Superbowl titles in 1972, 1978, 1993, and 1994.

Fair Park

Although Fair Park, as it is known today, is the result of a massive building effort during the 1930s, its history as a fair ground begins as early as 1886 when the site was chosen for the Dallas State Fair and Exposition. Originally containing 80 acres, various Fair Presidents purchased additional land until the fair grounds contained approximately 117 acres in 1903. Turning down a developer’s offer to purchase the land, the fair corporation sold the property to the state in 1903.
for $125,000, under the condition that the Fair Association would be granted control of the fair grounds for the duration of the annual fall fair. The State Fair of Texas, as it was now known, continued until the advent of World War I. In 1918, the fairgrounds became Camp Dick, a temporary Air Force camp, and the annual fair was canceled until 1921. Following the war, operations resumed and construction within the fair grounds continued. Fair Park Auditorium (Music Hall) was built in 1925 and work on the Fair Park Stadium (Cotton Bowl) began in 1930. In 1934, after the state appropriated $100,000 to initiate organization of a centennial celebration, the City of Dallas began competing with Houston and San Antonio to win the honor of hosting the affair.

Led in large part by Dallas Chamber of Commerce president, R. L. Thornton, Jr., Dallas was eventually chosen over the other two potential sites. Preparation began at once to transform Fair Park into a place befitting the Texas Centennial Exposition. The property was expanded and George L. Dahl was chosen to serve as Centennial Architect. Dahl, with the help of a large staff consisting of prominent architects and designers, was responsible for the renovation of many existing buildings and the construction of dozens of new structures. Between June 6th and November 30th of 1936, 6,353,827 people attended the Exposition. The Exposition was revived the following year, renamed the Greater Texas and Pan American Exposition. During the following decades, some of the buildings constructed during 1936-37 have been lost to natural disaster or demolition, and some have been remodeled; however, the majority of the buildings from that period remain relatively unchanged. Fair Park continues to be used for the annual fair and also hosts a variety of special events, such as the World Cup 1994 soccer games. In addition, during the week local school groups visit the numerous museums located at the southern end of the park.

**Housing**

Bryan's original survey for Dallas used the Trinity River as the western boundary, with streets laid out at right angles to the river. A competing survey drawn by Warren A. Ferris, done for John Grisby, was laid out at 45 degrees off cardinal directions. A third survey made for the Peters colony laid out sections using cardinal directions. The results are an odd series of
doglegged streets downtown. Annexation of adjacent communities added another layer of
surveying patterns to the Dallas street map. Although the first residential subdivision, the
Cedars, was built south of downtown in the 1880s, most residential development has been
toward the north and east. Segregated housing confined African Americans to a few
overcrowded areas.

In 1949, a group of small established communities south of Dallas were annexed to the City
while experiencing an unprecedented boom in housing to meet the urgent post-war need for
homes. These areas continued to grow into an area now generally referred to as Pleasant Grove.
For many years, and to some extent in the modern day, this area remained culturally and
economically separate from the larger municipality of Dallas due to its unique physical
relationship to the rest of the city, cut off by White Rock Creek.

Violence occurred as blacks began to integrate neighborhoods in South Dallas during the 1950s.
Freedman's Town, the oldest of the freedmen's towns, in the State-Thomas area northeast of
downtown, virtually disappeared with commercial development in the 1980s except for a historic
cemetery that was literally unearthed during the widening of Central Expressway. The principal
Hispanic barrio, immediately north of downtown, has also been displaced by commercial
development.

The building boom of the 1970s and 1980s produced a distinctive contemporary profile for the
downtown area, influenced by nationally prominent architects. At the same time, the
establishment of the West End Historic District in the 1980s preserved a group of late-
nineteenth-century brick warehouses that have been adapted for use as restaurants and shops.
Similar efforts have been made in Deep Ellum, where the 1920s-era storefronts now house clubs
and restaurants.
Consulting and Interested Parties

The Section 106 guidelines require that a Federal agency evaluate all properties within the APE and identify historic properties by seeking information from consulting parties, and other individuals and organizations likely to have knowledge of, or concerns with, historic properties in the area. The following organizations having interests, involvement, or concerns relating to historic preservation were contacted for the proposed Light Rail project:

- City of Dallas, Planning & Development, Historic Preservation Division
- City of Dallas Landmarks Commission
- Dallas County Historical Commission
- Dallas Historical Society
- Preservation Dallas
- Deep Ellum Association
- Fair Park Board
- Friends of Fair Park
- City of Dallas Park and Recreation Department

In addition, community workshops were held prior to the selection of the Light Rail Alternative and stakeholder meetings have continued during the preliminary engineering process. A list of public meetings and presentations is included as Appendix B.

Field Survey

A field survey of all buildings and structures within the DART SE Light Rail APE was undertaken by FTA/DART according to standard Section 106 guidelines and related procedures. Field investigations were conducted by a qualified architectural historian, Catherine E. Barrier of Myra L. Frank & Associates, Inc. The field investigations were conducted on March 28th, 29th, and 30th, 2001. During the field investigations, the boundaries of the preliminary APE were confirmed, and an assessment was made of all extant buildings and structures within the
APE to determine if their age and integrity warranted application of National Register criteria.

The field survey of historic and architectural resources included the following steps:

- A field survey consisting of a visual on-site examination of every parcel within the APE, including an assessment of integrity;
- Identification of the age of all major buildings, structures, objects, and districts located within the APE;
- Photography of each district feature, major structure, building, or object within the APE that was identified as older than 1954 or of outstanding significance;
- Review in the field findings of previous surveys and inventories of significant historic properties.
- Following the field survey, site specific research was conducted at the following:
  - Archives of the Dallas Public Library
  - City Directories of Dallas, Texas.
  - Building Permits

In addition, historical information was requested from the following organizations and individuals:

- City of Dallas Landmarks Commission
- Friends of Fair Park
- Central Electric Railfans’ Association
- City of Dallas Park and Recreation Department

The results of the identification effort are reported in the tables in the following section, and on Texas Historic Resources Inventory Forms which are attached as Appendix C.

Finding of Eligibility-Buildings and Structures

In accordance with 36 CFR 800.4(c)(2), FTA and DART are seeking SHPO concurrence with its determination that the following properties within the DART SE Light Rail APE are listed in or eligible for listing in the National Register of Historic Places:

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1 *i.e.*, meeting the Secretary of the Interior’s Professional Qualifications Standards
(48 FR 44738-9)
## Finding of Eligibility

### Table 1: Properties Listed in the National Register

<table>
<thead>
<tr>
<th>Address</th>
<th>Resource Name</th>
<th>Year Built</th>
<th>Significance</th>
<th>Key Reference /APE Map Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>3800 Commerce</td>
<td>John E. Mitchell Co. Plant</td>
<td>1928</td>
<td>Listed 03-04-1991</td>
<td>H / 4</td>
</tr>
<tr>
<td>3301-3333 Elm St., 212 and 232 Trunk Ave.</td>
<td>Continental Gin District</td>
<td>1888-1914</td>
<td>Listed 02-14-1983</td>
<td>F / 3</td>
</tr>
<tr>
<td>Parry Ave on the northwest, the Texas &amp; Pacific Railroad tracks on the northeast, Cullum Blvd on the southwest, and Pennsylvania Ave on the southeast</td>
<td>Fair Park (Texas Centennial Exposition Buildings)</td>
<td>1936-37</td>
<td>Designated a National Historic Landmark 09-24-1986</td>
<td>O / 4</td>
</tr>
</tbody>
</table>

### Table 2: Properties Previously Determined Eligible For Listing In The National Register

None.
## Finding Of Eligibility

### Table 3: Properties Found Eligible For Listing In The National Register For Which Concurrence Is Requested

<table>
<thead>
<tr>
<th>Address</th>
<th>Resource Name</th>
<th>Year Built</th>
<th>Significance</th>
<th>Key Reference /APE Map Page</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Commerce Street Warehouse District (contributing properties within APE)</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4044 Commerce</td>
<td>Lincoln Paint &amp; Color Co. Bldg.</td>
<td>1945</td>
<td>Contributor to the Commerce Street Warehouse District, which appears eligible</td>
<td>I / 4</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>for the National Register under Criteria A and C</td>
<td></td>
</tr>
<tr>
<td>4100 Commerce</td>
<td>Alexander Motor Company Building</td>
<td>1929</td>
<td>Contributor to the Commerce Street Warehouse District, which appears eligible</td>
<td>J / 4</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>for the National Register under Criteria A and C</td>
<td></td>
</tr>
<tr>
<td>4118 Commerce</td>
<td>W. Gottlich Co. Manufacturing Bldg.</td>
<td>1929</td>
<td>Contributor to the Commerce Street Warehouse District, which appears eligible</td>
<td>K / 4</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>for the National Register under Criteria A and C</td>
<td></td>
</tr>
<tr>
<td>4140 Commerce</td>
<td>NS A&amp;B Simons Building;Textile Building</td>
<td>1927</td>
<td>Contributor to the Commerce Street Warehouse District, which appears eligible for the National Register under Criteria A and C</td>
<td>L / 4</td>
</tr>
<tr>
<td>3801 Parry</td>
<td>Old Tige</td>
<td>1920</td>
<td>Contributor to the Commerce Street Warehouse District, which appears eligible for the National Register under Criteria A and C</td>
<td>N / 4</td>
</tr>
<tr>
<td>3809 Parry</td>
<td>Howard Wolfe Building and Garage</td>
<td>1929</td>
<td>Contributor to the Commerce Street Warehouse District, which appears eligible for the National Register under Criteria A and C</td>
<td>M / 4</td>
</tr>
<tr>
<td><strong>Deep Ellum Historic District (contributing properties within APE)</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2605 Elm</td>
<td>Fink Paint Co. Bldg.</td>
<td>1944</td>
<td>Contributor to the Deep Ellum Historic District, which appears eligible for the National Register under Criteria A and C</td>
<td>E / 1</td>
</tr>
<tr>
<td>2609 Elm</td>
<td>Southern Refrigeration Co. Bldg.</td>
<td>1940</td>
<td>Contributor to the Deep Ellum Historic District, which appears eligible for the National Register under Criteria A and C</td>
<td>D / 1</td>
</tr>
<tr>
<td>2615 Elm</td>
<td>American Transfer &amp; Storage</td>
<td>1924</td>
<td>Appears eligible individually under Criterion C and as a Contributor to the Deep Ellum Historic District, which appears eligible for the National Register under Criteria A and C</td>
<td>C / 1</td>
</tr>
<tr>
<td>2625 Elm</td>
<td>Manufacturers Expo Bldg.</td>
<td>1924</td>
<td>Contributor to the Deep Ellum Historic District, which appears eligible for the National Register under Criteria A and C</td>
<td>B / 1</td>
</tr>
<tr>
<td><strong>Individually Eligible Properties</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>624 N. Good-</td>
<td>St. James AME Temple</td>
<td>1919</td>
<td>Appears eligible individually under Criterion A and C</td>
<td>A / 1</td>
</tr>
<tr>
<td>Latimer</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3601 Main</td>
<td>National Biscuit Company</td>
<td>1930</td>
<td>Appears eligible individually under Criterion C</td>
<td>G / 3</td>
</tr>
</tbody>
</table>
## Finding Of Eligibility

**Table 4: Properties Constructed Before 1954 That Do Not Appear To Meet The National Register Criteria For Evaluation**

<table>
<thead>
<tr>
<th>Address</th>
<th>Resource Name</th>
<th>Year Built</th>
<th>Reference ID Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>1005 4th</td>
<td>Hipped Roof Cottage SF Residential Structure</td>
<td>1913</td>
<td>1</td>
</tr>
<tr>
<td>3731 Bertrand</td>
<td>Craftsman Bungalow SF Residential Structure</td>
<td>1936</td>
<td>2</td>
</tr>
<tr>
<td>415 Buckner</td>
<td>Cole Distributor's</td>
<td>1953</td>
<td>3</td>
</tr>
<tr>
<td>6326 C F Hawn</td>
<td>Taqueria Chihuahua</td>
<td>1953</td>
<td>5</td>
</tr>
<tr>
<td>6334 C F Hawn</td>
<td>R M Cylinder Head</td>
<td>1950</td>
<td>6</td>
</tr>
<tr>
<td>6520 C F Hawn</td>
<td>Budget Automotive</td>
<td>1952</td>
<td>4</td>
</tr>
<tr>
<td>7230 C F Hawn</td>
<td>Dallas Spray Equipment</td>
<td>1950</td>
<td>7</td>
</tr>
<tr>
<td>4112 Commerce</td>
<td>Too Blue Scenic</td>
<td>1927</td>
<td>8</td>
</tr>
<tr>
<td>4130 Commerce</td>
<td>Mid Century Commercial Structure</td>
<td>1954</td>
<td>9</td>
</tr>
<tr>
<td>301 N. Crowds</td>
<td>Yahoo!</td>
<td>1954</td>
<td>10</td>
</tr>
<tr>
<td>3901 Demaggio</td>
<td>Minimal Traditional SF Residential Structure</td>
<td>1928</td>
<td>11</td>
</tr>
<tr>
<td>3907 Demaggio</td>
<td>Hipped Roof Cottage SF Residential Structure</td>
<td>1905</td>
<td>12</td>
</tr>
<tr>
<td>3911 Demaggio</td>
<td>Minimal Traditional SF Residential Structure</td>
<td>1942</td>
<td>13</td>
</tr>
<tr>
<td>DP&amp;L Jim Miller</td>
<td>Utility Substation</td>
<td>1924</td>
<td>14</td>
</tr>
<tr>
<td>3815 East Side</td>
<td>Vernacular Commercial Structure</td>
<td>1948</td>
<td>15</td>
</tr>
<tr>
<td>7711 Elam</td>
<td>Minimal Traditional SF Residential Structure</td>
<td>1930</td>
<td>16</td>
</tr>
<tr>
<td>7717 Elam</td>
<td>Vernacular SF Residential Structure</td>
<td>1920</td>
<td>17</td>
</tr>
<tr>
<td>7725 Elam</td>
<td>Early Twentieth Century Vernacular SF Residential Structure</td>
<td>1900</td>
<td>18</td>
</tr>
<tr>
<td>7733 Elam</td>
<td>Vernacular SF Residential Structure</td>
<td>1938</td>
<td>19</td>
</tr>
<tr>
<td>7803 Elam</td>
<td>Minimal Traditional SF Residential Structure</td>
<td>1935</td>
<td>20</td>
</tr>
<tr>
<td>7916 Elam</td>
<td>Minimal Traditional SF Residential Structure</td>
<td>1955</td>
<td>21</td>
</tr>
<tr>
<td>3209 Elihu</td>
<td>Hipped Roof Cottage SF Residential Structure</td>
<td>1912</td>
<td>22</td>
</tr>
<tr>
<td>3226 Elihu</td>
<td>Hipped Roof Cottage SF Residential Structure</td>
<td>1912</td>
<td>23</td>
</tr>
<tr>
<td>3235 Elihu</td>
<td>Dutch Colonial Revival SF Residential Structure</td>
<td>1912</td>
<td>24</td>
</tr>
<tr>
<td>3333 Elm</td>
<td>McCathern, Mooyt, &amp; Buffington, LLP</td>
<td>1914</td>
<td>25</td>
</tr>
<tr>
<td>2601 Gaston</td>
<td>Moderne Commercial Structure</td>
<td>1930</td>
<td>26</td>
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</tbody>
</table>
### Finding Of Eligibility

**Table 4: Properties Constructed Before 1954 That Do Not Appear To Meet The National Register Criteria For Evaluation**

<table>
<thead>
<tr>
<th>Address</th>
<th>Resource Name</th>
<th>Year Built</th>
<th>Reference ID Number</th>
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<tr>
<td>404 N. Good-Latimer</td>
<td>Slocum Printing Co.</td>
<td>1928</td>
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<tr>
<td>617-619 Good Latimer</td>
<td>Vernacular Commercial Structure</td>
<td>1949</td>
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<td>3202 Metropolitan</td>
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<td>614 Old South</td>
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<tr>
<td>621 Old South</td>
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<td>550 Palmetto</td>
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<td>3630 Reed</td>
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<td>Minimal Traditional SF Residential Structure</td>
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<td>7706 Rilla</td>
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<td>1948</td>
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<td>7710 Rilla</td>
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<td>7716 Rilla</td>
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</table>
### Table 4: Properties Constructed Before 1954 That Do Not Appear To Meet The National Register Criteria For Evaluation

<table>
<thead>
<tr>
<th>Address</th>
<th>Resource Name</th>
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<tr>
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<td>7726 Rilla</td>
<td>Minimal Traditional SF Residential Structure</td>
<td>1948</td>
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<td>Minimal Traditional SF Residential Structure</td>
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<td>Minimal Traditional SF Residential Structure</td>
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<td>7816 Rilla</td>
<td>Minimal Traditional SF Residential Structure</td>
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<td>7922 Rilla</td>
<td>Minimal Traditional SF Residential Structure</td>
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<td>1952</td>
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<td>7122 Rosemont</td>
<td>Vernacular SF Residential Structure</td>
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<td>71</td>
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<td>7132 Rosemont</td>
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<td>7204 Rosemont</td>
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<td>74</td>
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<td>4527 Scyene</td>
<td>Colonial Revival Cottage SF Residential Structure</td>
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<td>667 Southeast</td>
<td>Minimal Traditional SF Structure</td>
<td>1938</td>
<td>78</td>
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<tr>
<td>670 Southeast</td>
<td>Minimal Traditional SF Residential Structure</td>
<td>1935</td>
<td>79</td>
</tr>
<tr>
<td>2606 Swiss</td>
<td>Giddings &amp; Wells Body Shop</td>
<td>1924</td>
<td>80</td>
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</table>
## Finding Of Eligibility

### Table 4: Properties Constructed Before 1954 That Do Not Appear To Meet The National Register Criteria For Evaluation

<table>
<thead>
<tr>
<th>Address</th>
<th>Resource Name</th>
<th>Year Built</th>
<th>Reference ID Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>306 Walton</td>
<td>Texas Screen Process Supply Company</td>
<td>1938</td>
<td>81</td>
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<tr>
<td>3808 Willow</td>
<td>Utilitarian Industrial Structure</td>
<td>1937</td>
<td>82</td>
</tr>
<tr>
<td>3838 York</td>
<td>Minimal Traditional SF Residential Structure</td>
<td>1926</td>
<td>83</td>
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### Bridges within the APE

<table>
<thead>
<tr>
<th>Address</th>
<th>Resource Name</th>
<th>Year Built</th>
<th>Reference ID Number</th>
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<tr>
<td>US 75 Overpass at Bryan Street</td>
<td>Highway Overpass</td>
<td>1951</td>
<td>84</td>
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<tr>
<td>Good-Latimer Underpass</td>
<td>Underpass</td>
<td>1930;52</td>
<td>85</td>
</tr>
<tr>
<td>SPRR Jacksonville Milepost 314.54</td>
<td>Timber Railroad Bridge</td>
<td>1932</td>
<td>86</td>
</tr>
<tr>
<td>Sycene Road Bridge over White Rock Creek</td>
<td>Highway Overpass</td>
<td>1931</td>
<td>87</td>
</tr>
<tr>
<td>SPRR Jacksonville Milepost 314.34</td>
<td>Timber Railroad Bridge</td>
<td>1941</td>
<td>88</td>
</tr>
<tr>
<td>SPRR Jacksonville Milepost 314.17</td>
<td>Timber Railroad Bridge</td>
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<td>Timber Railroad Bridge</td>
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<td>SPRR Jacksonville Milepost 312.71</td>
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<td>SPRR Jacksonville Milepost 312.20</td>
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<td>92</td>
</tr>
<tr>
<td>SPRR Jacksonville Milepost 310.75</td>
<td>Timber Railroad Bridge</td>
<td>1942</td>
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<td>SPRR Jacksonville Milepost 310.05</td>
<td>Timber Railroad Bridge</td>
<td>1940</td>
<td>94</td>
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</table>

Historic Resources Inventory forms for each of the properties listed above are located in Appendix C. The forms are arranged first according to their National Register eligibility status category as given in the tables above, and then alphabetically by street address. Forms were not prepared for properties with buildings constructed after 1954, unless there was an indication that the property may have importance significant enough to override the National Register’s 50-year age criteria consideration.
Good-Latimer Underpass

The Good-Latimer Underpass was originally constructed in the late 1920s or 1930 to facilitate the flow of traffic under the congested tracks of the Houston & Texas Central (H&TC) Railroad (Dallas Landmark Commission Landmark Nomination Form, Deep Ellum, prepared 10.25.95 by The Research & Media Group). A visual survey of the structure show what appear to be two distinct areas of construction. The first section, to the northwest, is comprised of two large arches to accommodate two lanes of traffic and a smaller to allow pedestrian access, marked with the date 1930 and stylistically consonant with that period (See Figure 4).

Figure 4: Good-Latimer Underpass View from South (NW portion Marked)

The second section, to the southeast, is a larger arch accommodating two lanes of traffic of more utilitarian styling (See Figure 5). The H&TC trackway in this area was dismantled in 1952 for the construction of the Northwest Central Expressway Railroad (Dallas Landmark Commission Landmark Nomination Form, Deep Ellum, prepared 10.25.95 by The Research & Media Group), and it seems reasonable to surmise that this later construction was done at around the same time as the dismantling of the tracks. It is unclear from a visual examination whether the northwest portion was the original overpass (which was added on to), or whether the southeast portion of the existing underpass was originally constructed in the same design as the northwest portion and has been replaced.
The most striking element of the current appearance of the underpass is the decoration of the retaining walls leading to and through the underpass structure (See Figure 6). These decorations are in the form of murals created by local artists which seem to have been organized to help define the underpass as a "gateway" to the revitalized artists’ and music district that the Deep Ellum neighborhood has become since the 1980s. It appears that the murals are designed and installed on a rotating basis as a community project, with older murals painted over with new designs.
Significance of the Good-Latimer Underpass

The older portion of the underpass is minimally decorated, and appears to be an undistinguished example of Dallas underpass construction from this period, making it ineligible for listing on the National Register under Criterion C. The newer portion of the underpass is of utilitarian design, and appears to be an undistinguished example of Dallas underpass construction from this period, making it ineligible for listing on the National Register under Criterion C.

The older portion of the underpass was apparently associated with the activities which defined the National Register Eligible Deep Ellum District (Dallas Landmark Commission Landmark Nomination Form, Deep Ellum, prepared 10.25.95 by The Research & Media Group), although this association apparently was not sufficient to include the structure as a contributing structure to the Deep Ellum city landmark district nomination. The Deep Ellum district was significant primarily between the turn of the last century and World War II as an African-American shopping and cultural area. In any case, the integrity of its appearance from that time has been severely compromised by the alterations to the southeast portion of the underpass, rendering it ineligible for listing under Criterion A. The heyday of the Deep Ellum district was past by the early 1950s, and therefore the newer portion of the underpass does not appear to be associated with any movements or themes which would render it eligible for the National Register under Criterion A. Neither portion of the underpass appears to be associated with a historic personage, and therefore the underpass is not eligible for listing on the National Register under Criterion B.

It appears, therefore, that the significance of the underpass is not historic, but rather, if it has any significance it is to the community as a gateway to the current revitalized Deep Ellum district.
Bibliography


List of Preparers

*John Hoppie*, DART
   Project Manager

*Tom Shelton*, Carter-Burgess
   Project Description

   Principal Investigator, Body of Eligibility Report, Historical Context, Research, Historic Resources Inventory Forms

*Alan Skinner*, Ph.D., AR Consultants
   Archaeological Resources

   Additional Research

   Additional Research
Supplemental History Provided by Ms. Francis James
during the Comment Period for the DEIS
Southeast Corridor
History

The right of way for the Southeast Corridor of the Dallas Area Rapid Transit has a very interesting history starting in 1870s in Dallas. Fast growing Dallas needed the lumber from the piney woods of East Texas. In early 1878, a railroad organized and was called the Dallas Palestine and Southeast Railroad Co. Among its charterers were Alex Sanger, C.A. Keating, S.W.S. Duncan, C.B. Buckner, W.H. Gaston, W.C. Conner, and Jules Schneider. For some reason, not of record, they abandoned this charter and took out another one on November 6 of the following year under the name of Texas Trunk Railroad Company to build to Beaumont through East Texas territory. Work got underway and by August 1881 there were thirty-six miles of line in operation. The little railroad had nothing but local traffic which did not yield enough revenue to pay operating expenses and in December of the same year, Thomas Simpson was appointed Receiver. He held the office only about a month when he was succeeded by H.T. Nash, who held it until 1883 when C.A. Keating was appointed. Keating not only kept it going but extended it fifteen more miles to Cedar to reach a rich agriculture section. Even this new territory did not add enough business to maintain the road and it was finally sold in 1883. The most valuable of its assets were 107,520 acres of land it had received from the State, but, indicative of what railroads generally received for
such lands, they brought only $7,500 at this sale, or about seven cents per acre. This little railroad has the distinction of having had more receivers than any other railroad in Texas, in fact it is doubtful whether any in the United States had seven in the first fifteen years as this one did.

Through all of these changes and receiverships the road retained its corporate name. Its stock passed formally into the hands of the Southern Pacific in 1895.

This history is taken from the book *A History of Texas Railroads* by S.G. Reed published in 1941 by the St. Clair Publishing Company in Houston, Texas. Pages 232-233 quotes.
Southeast Corridor

Buckner Station Site

The southwest corner of Buckner Blvd. and Elam Road is in the heart of the area of Dallas known as Pleasant Grove. When settlers began arriving in North Texas in the 1840s, they looked for land that would afford them water, trees to build a cabin, and fertile soil to grow a crop. Jesse Elam was the pioneer who used his Peters Colony certificate to locate on 640 acres in 1845 and this corner of Buckner and Elam was the northeast corner of his section of land.

He was shown in the first census of Dallas County in 1850 as a 68 year old farmer, born in Georgia. Along with his own large family, other Elams also came to this area. The community surrounding this corner was known as Elam. Other neighbors were the families of Cornelius Cox, Richard Bruton, William Hunnicutt, Albert and Abraham Carver, James and John Beeman, George Markham, born in England, Gideon Pemberton, and William and Martin Pruitt. There were a lot more brothers and cousins all named Elam with their wives and children. Many of these families intermarried and still live in the area. Across what is now Buckner Blvd. was where Sally Perry, a 51 year old widow who came to Texas with two children patented her 640 acres of land.
Not every farmer could manage a complete section (one square mile of land) so they would sell off portions as other settlers arrived. Sometimes the land was sold for as little as $1.00 per acre. As soon as these settlers could manage they joined together to build a log cabin to be used as a school and church. They began worshiping together in the one room cabin but managed to organize a church of their own denomination as soon as enough like minded settlers arrived. They would take turns on holding the services and teaching the Sunday Schools. There are descendants of these families who are still worshiping at Pleasant Grove churches that were formed by these pioneers.

For about three miles in all directions from the Elam/Buckner corner, this area of Dallas County became known as Pleasant Grove. The fact that there were so many trees caused an early school teacher looking around to say, “This is a Pleasant Grove,” and to this day, the name has remained. Until the turn of the century this was mostly a rural community. Until the railroads came to Dallas in 1872, the only cotton grown was for the family’s own use - after that it became a cash crop, because it could now be transported by rail to Houston and oversea markets. This changed the face of the area and the size of the farms.

By 1878 when the Dallas Palestine and Southeast Railroad was completed. It had been designed to bring lumber from the piney woods of East Texas to
Dallas to be used for building. The corner of Elam and Buckner was where a section house was built and the Elam Post office was opened in 1884. The Post Office was in a general merchandise store operated by Silas Pruitt. There was also a blacksmith shop at this site. There is family lore about the train coming through twice a day. If there were no passengers to get on or get off, the mail bag was merely tossed off at the station as the train went by. The name of this railroad was changed to Texas Trunk and is now the right of way that is being utilized for the Southeast Corridor of Dart.

The community established a school district and by the turn of the century the high school was known as the Pleasant Grove High School. The cost of maintaining a growing school district in the area was one of the reasons this area was finally annexed to the City of Dallas in 1949. By that time there were enough hard surface roads that the residents could safely go back and forth to the City to their jobs.
ATTACHMENT E2
PUBLIC COMMENT ON GOOD-LATIMER TUNNEL
December 4, 2001

Gregory Smith, National Register Programs Director
Texas Historical Commission
PO Box 12276
Austin, TX 78

Re: Good Latimer Tunnels – Potential Eligibility for National Register
Dallas Area Rapid Transit Light Rail Project

Dear Mr. Smith:

On December 3, 2001 the Landmark Commission voted to provide your office its opinion related to the historic significance of the Good Latimer Tunnels located immediately to the east of downtown Dallas. The Dallas Area Rapid Transportation (DART) authority has developed several options to construct a light rail line in this area. In recent months DART has gravitated towards the option that would demolish and fill the tunnels.

The Landmark Commission believes that the Good Latimer Tunnels are potentially eligible for listing in the National Register of Historic Places under Criterion A for their significance as an integral part of the system of bridges, overpasses, tunnels and other structures proposed in the Ulrickson Plan for Dallas of 1927 - 1929.

The Plan called for removal of railroad grade crossings, consolidation of railroad lines, moving and channelization of the Trinity River between levees, and other interrelated, large scale public works projects that resulted in massive and important transportation system improvements. The first tunnel, constructed in 1930, was contemporaneous with development of the Trinity levees and viaducts, the Lamar-McKinney railroad underpass, the underpasses on Corinth Street and several other structures first described in the Ulrickson Plan. The expansion of the Good Latimer underpass occurred in 1952 with the construction of the adjacent tunnel, which occurred when another urban development plan was implemented to create a vehicular loop around the central business district to accommodate additional significant growth in vehicular traffic.

The Good Latimer Tunnels are significant as a contributing element in a potential National Register-eligible thematic nomination for transportation related structures associated with the Ulrickson Plan of 1927 - 1929 and other municipal planning efforts to improve vehicular and railroad traffic patterns and protection of the central business district from flooding.

We think the Good Latimer Tunnels should be preserved.

Thank you for your interest in this important historic project,

Allison Reaves-Poggi, Chair
Dallas Landmark Commission
March 5, 2002

Mr. John Hoppie
Project Manager
Dallas Area Rapid Transit
P.O. Box 660163
Dallas, TX 75226

Re: Southeast Corridor DEIS Comments

Dear Mr. Hoppie:

As a majority landowner in the Deep Ellum Area, I would like to take this opportunity to state that Westdale recognizes the importance of DART and is in full support of enclosing the 300-foot long tunnel that currently goes under Gaston Avenue. Although this tunnel has become an attraction celebrating artistic expression, I feel that enclosing it would be far more beneficial for the area aesthetically, while offering a wealth of commercial potential.

Upon reviewing Figure 5.17, Good-Latimer Visual Concepts, of the Southeast Corridor DEIS, I want to go on record that I am in favor of the Good-Latimer Alignment Option A, as illustrated in Figure 5.4. While the illustrations in Figure 5.17 are artistic renditions, I am in agreement that Option A should provide a new gateway with new visual assets. Westdale currently owns property adjacent to where the gateway would be located should Option A be chosen. The potential commercial development of Westdale's land and the area is far greater with Option A.

I am not in support of Option B because visual impacts would be greater than Option A. Even though the Knights of Pythias Temple, which is owned by Westdale, is currently vacant, Option B could have a negative impact visually in the future once the building has been developed.

Thank you for allowing me to share my comments on the Southeast Corridor DEIS. I look forward to the progress and people that the LRT will bring to the Deep Ellum Area.

Sincerely,

[Signature]
Joseph G. Beard
President
March 12, 2002

Mr. Doug Allen  
Executive Vice President  
Program Development  
Dallas Area Rapid Transit  
P. O. Box 660163  
Dallas, Texas 75266-7213

Dear Mr. Allen:

Subject: DART Rail Line Plans for Good-Latimer Street

The Meadows Foundation has watched the development of DART’s light rail plan for Good-Latimer and has been supportive of your plans to bring DART down the middle of Good-Latimer. Our staff has attended the public briefings on the various proposals, discussed them with DART staff, and reviewed the written materials. Your efforts to communicate with the public are to be commended, and I greatly appreciate your taking time recently to meet with Bob Weiss and me. However, the information you have given us regarding your plans for a possible new alternative route for the Good-Latimer tracks, (labeled C on your drawings) has made it necessary for The Meadows Foundation to go on record today with our thoughts on how best to safely align the tracks on Good-Latimer while preserving the businesses on both sides of the street.

We are unequivocally opposed to option C that would place the tracks on the east side of Good-Latimer and would displace ongoing businesses as well as threaten the historically designated St. James A.M.E. Temple. We support placing the tracks down the middle of Good-Latimer, which would protect the Landmark church and disrupt the least number of businesses. The Meadows Foundation has long been a supporter of the City of Dallas and efforts to improve our community. We do not take this stance easily. We understand that the Good-Latimer tunnels may be eligible to be considered for historical recognition. Therefore, any rail alignment proposal should be reviewed thoughtfully.
Through our experience in funding historic preservation, we know the importance of preserving our past, but not at the expense that would be represented here. Over 20 years, The Meadows Foundation has granted over $15 million across Texas for historic preservation work. We have funded small projects and large ones. We have funded studies done by the State Historical Commission and appreciate their important work.

In Dallas, we have supported Old City Park and most recently the restoration of St. James A.M.E. Temple at 628 Good-Latimer at a cost of $1.7 million. The St. James church is now a City Landmark building. The gem of our restoration activity, of course, is the Wilson Historic District that now encompasses 22 acres and houses 28 nonprofit agencies, including Preservation Dallas whose counsel we value. The Meadows Foundation has restored 25 buildings and built 3 new ones during the course of this project. Our office is located at 3003 Swiss, just 4 blocks east of Good-Latimer. The Wilson Block or the 2900 block of Swiss Avenue is listed on the Federal, State, and City historic registers.

During the 20 years of developing the Wilson Historic District, the Foundation has spent over $50 million on the project and spends approximately $3 million a year to police and maintain it. As a gift to the City and at a cost of $800,000 over the past 18 years, we restored and maintain the City’s Central Square Park across from our headquarters.

More recently, The Meadows Foundation commissioned an economic impact study, done by Insight Research Corporation, to determine the economic value added by the Wilson Historical District. During the course of the project, $256 million in economic value has been generated and approximately $7 million in non-payroll taxes have been paid to various taxing entities.

To mention all of this is simply to say that The Meadows Foundation has had a long history of supporting historic preservation projects and learned much about how to do it. We have earned our credentials to comment today. And one way not to do historic preservation is to cause profound economic dislocation and threaten an already more significant and historically designated structure. That is why we support Option A.

We cannot support your proposed Option C to bring the line on the east side of Good-Latimer for the following reasons.

First, the St. James A.M.E. Temple is one of the most significant African American buildings in Dallas, designed by William Sidney Pittman and funded and built by African Americans. The Meadows Foundation purchased this structure and spent
$1.7 million to restore, adapt it for reuse and protect it for generations to come. The City of Dallas recognized this fact by granting it Landmark status. Proposed Option C would place the tracks too close to the building and, in fact, take part of the parking lot. As the owner, we will contest any eminent domain action that would jeopardize the safety of the church. DART has presented us with a difficult choice. We believe the St. James A.M.E. Temple is more historically important than the Good-Latimer tunnels. In our opinion, it is not prudent to threaten and change a historically designated building to preserve tunnels that might be eligible for such consideration.

Second, we believe the most feasible and prudent economic decision is to run the tracks down the center of Good-Latimer and bring Gaston to grade. Under Option C, four businesses would have to be closed, relocated, and eminent domain used to purchase their property. Although we do not know how much this would cost, it would appear to be an unnecessary expenditure and added cost to taxpayers. We believe Option B would present the same problems. This area benefits from the small businesses operating here in the creation of jobs and the generation of taxes, all of which stabilize the area. Why force them out when there is a more feasible and prudent alternative for the track alignment?

Third, several years ago the Foundation purchased the building located at 402 Good-Latimer with the intent to gift it to Shared Housing, a local non-profit organization helping low income people with housing issues. We recently gifted the building to them with the understanding that when restored, it would become their permanent home. One of the considerations for the purchase of this building was the fact that, between DART bus and rail service, the Shared Housing program would become more accessible to the clients they serve. In addition, The Meadows Foundation partnered with the City of Dallas to grant approximately $125,000 in public funds for the renovation of the facility. The building has now been renovated and Shared Housing has moved in. Clients are being served. The Meadows Foundation opposes any potential action that would destabilize this agency's work and negatively impact the people they serve. This is not the intent of historic preservation, especially when there is a more prudent and feasible alternative.

Fourth, according to Dallas Police Department accident statistics for the calendar year 2001, there were 23 vehicular accidents between the 200 and 500 blocks of North Good-Latimer. Of these, eleven accidents involved the 400 block of Good-Latimer and the tunnels, with seven considered major. In addition, 5 more accidents involved the Swiss Avenue and Good-Latimer intersection near the tunnel service road. Although we realize that drivers cause vehicular accidents, it is our belief that poor visibility and design now render the tunnels unsafe for modern vehicles.
Fifth, we have observed the artwork painted on the tunnels and have wondered if this was part of the original construction. It appears that the tunnels have already been adaptively reused for economic reasons that are unrelated to historical preservation purposes. The Foundation remained neutral and silent while this art project took place. It strikes us as odd for the State Historical Commission to suggest that the tunnels are potentially eligible for some type of historical designation after they have been altered by the work of artists.

The Meadows Foundation recognizes that some Deep Ellum business owners believe that removing the tunnels would potentially cause adverse economic consequences. If the tunnels were to be removed, we would support a plan to create a new gateway as a replacement, and believe this would be the prudent, feasible, and responsible action for DART to take.

Finally, the east side of Good-Latimer is The Meadows Foundation’s strategic border for its Wilson Historic District. We assembled the land for the Latino Cultural Center and gifted it, along with $250,000, to the City of Dallas. It is exciting to see construction underway. The St. James A.M.E. Temple restoration was a labor of love and a statement of how important The Meadows Foundation believes historic preservation can be to preserve our heritage. It is significant that the Latino Cultural Center and the St. James A.M.E. Temple are side by side, reflecting the past and future of Dallas. Further down the street, we find Shared Housing, a group of dedicated individuals committed to improving the lives of low-income people in our community. These projects reflect our position that the area along Good-Latimer is crucial to the success of the surrounding area. It is also an important boundary for the Wilson Historic District.

We hope you will agree with us that Option A is more prudent and feasible than Option C. We know that by working together, we can find the right solution for the rail alignment that can satisfy everyone’s interests and better serve our community.

We appreciate the opportunity to express our views and thank you for your careful consideration of our position. We look forward to working with you as your plans develop.

Sincerely,

[Signature]

Linda P. Evans
Southeast Corridor
Environmental Impact Statement Study

Name/Nombre: Jeanne Martin

Address/Dirección: 3025 Commerce St.

City/Ciudad: Dallas

Zip Code: 75226

Telephone/Telefono: 214 915-4555

Please make public record.

Comments/Comentarios:

I am a property owner, a business proprietor and a resident of Deep Ellum. I have significant financial investment (long term) in this area. I am in favor of only option A.

I want to have the tunnel filled in and a new gateway installed.
I would like to see Option A of Good-Lakeline Expressway Area. It will be better for everyone. Why move or take away business and people from there place? Why... so please go with Alignment Option A-A.

DALLAS AREA RAPID TRANSIT
DALLAS AREA RAPID TRANSIT
RECEIVED
MARCH 14, 2002
MARCH 18, 2002
CAPITAL PLANNING & DEVELOPMENT
CAPITAL PLANNING & DEVELOPMENT
March 12, 2002

Via US Standard Mail:
Mr. Ernie Martinez
Dallas Area Rapid Transit
PO Box 660163
Dallas, TX 75266-9672

RE: Vehicular Tunnel at Good Latimer and Gaston in the Deep Ellum District

Dear Ernie,

With 15 years as a major property owner, resident and business owner in the Deep Ellum District, I want to express my strongest support for the infilling of the above-mentioned tunnel. It is imperative for proper vehicular ingress/egress, DART, and pedestrian connectivity that this tunnel location be brought to grade. I am aware that there is a movement among groups of people in the Deep Ellum area, many of which are not stakeholders in the area, to maintain the tunnel in its current location. I am opposed to their stance and request DART in its final conclusions bring the area to grade.

I have also been made aware of the possibility of a $1.5MM stipend from DART to create a public art alternative to the existing tunnel art at the DART station, either by using pieces of the existing tunnel façade, or creating other artistic elements in concert with the Deep Ellum character. I am in support of those funds being appropriated and suggest the Deep Ellum Foundation Board of Directors, on which I sit, in conjunction with DART, be responsible for the oversight of the use of those funds.

I also strongly advocate DART having in place a well thought-out traffic management program to allow ingress/egress into the Deep Ellum area via Goodlatimer and other arteries during any construction period.

We appreciate DART's support in the endeavor. If you have any questions, please feel free to reach me at my office at 214/761-0109, or page me at 214/877-4947.

Sincerely,

Jeff Swaney
President
Delphi Group Inc.
3002A Commerce
Dallas, TX 75226
(214) 761-0109 Direct
(214) 761-0032 Fax
jaswaney@delphigroupinc.com

cc: Rosa Rosteed, DART
Jack Wierzenski, DART
Rick Slaven, 2M Companies
Bob Weiss, Meadows Foundation
John Hoppie - One comment, one question on the SE Corridor DEIS

From: no-spam@thank-you.com
To: <jhoppie@dart.org>
Date: 3/15/02 10:28 AM
Subject: One comment, one question on the SE Corridor DEIS
CC: <schumach@rsn.hp.com>

Mr. Hoppie:

Please push for Good-Latimer alignment option A. The existing tunnel is unattractive, and dangerous for both traffic and pedestrians. It would be a mistake to preserve it, especially if doing so would increase the costs, or decrease the operating performance of the SE rail line. If the city of Dallas wants to remove and preserve the tunnel artwork at another location then that should be at the city's expense.

Does (or can) the Buckner station include a park-and-ride lot? That would seem to be the most effective location for capturing inbound commuters from 175.

regards,
Richard Schumacher
Mr. Hoppie,

I spoke to you last week at the library in Pleasant Grove and said that I would send you an e-mail regarding my feeling of the options about the Good Latimer railroad/art bridge.

I support option B, which will run the Dart LRT west of Good Latimer and the elevate it over the bridge. This will let Dart get things going and not disturb the bridge or the new apartments on the east side of Good Latimer and not be in conflict with the other Historic buildings on the east side.

Steve Turner
8765 Ferndale Rd. #166
Dallas, Texas 75238-3514
March 18, 2002

Jesse D. Oliver, Chairman
DART
P.O. Box 660163
Dallas, TX 75266-7200

Re: Opposed to Deep Ellum Tunnel

Dear Mr. Oliver:

The Dallas Morning News had an article on the Deep Ellum Tunnel on Sunday, March 17, 2002.

I am an Oaklawn apartment community property owner. I am opposed to keeping the Deep Ellum Tunnel. Good-Latimer is three lanes each way except at the tunnel where it narrows to two lanes each way. I have had two near accidents at the tunnel because drivers did not realize that their right lane merged with the middle lane. The tunnel is a safety hazard and should be eliminated. At the same time I want to be sensitive to the arts community and have the same type of art displayed on permanent panels at the entrance to Deep Ellum as is currently painted on the walls of the current tunnel. However, a highway safety hazard should not be kept because of its historical status.

Please distribute this letter to the other members of the DART Board of Directors.

Sincerely,

[signature]

Al Daniels, President
The Villas on Holland, Inc.

copy: Laura Miller, Mayor, City of Dallas
March 18, 2002

DART Community Affairs - 7232
DART
P.O. Box 660163
Dallas TX 75266-9672

Dear Sirs:

I attended the DART Southeast Corridor Public Hearing on 3/12/02. I spoke at that hearing against the Good Latimer Expressway Alignment Option “C”. However, I realized after my three minutes that more needed to be said.

I have attended all meetings in regard to the Southeast Corridor since they began in 2000. For at least the last year or more, I have been assured that Alignment Option “A” or “B” were the only Alignment Options being considered for the Good Latimer corridor.

This was very important to us for our long-range planning as we are located at 2601 Swiss Avenue at the corner of Swiss and Good Latimer. We purchased this property in May, 1991, and have occupied it ever since. Our business has grown, and we need every square inch we have. Alignment Option “C” will invade our existing property to the point we will be displaced and forced to move.

Based on the representations from DART over the past year as to the certainty of using Alignment Option “A” or “B” we began interior modifications of our building. We have been working on these modifications for months. They are nearly finished but still in process. We used our people after hours for virtually all of the work - at overtime rates. We have quite an investment in labor and materials for these changes.

As we have accounts all over the metroplex, we love our location. We have nearly immediate access to all freeway systems for Dallas and Fort Worth. Should we be displaced, it will be very difficult, if not impossible, to obtain at least 20,000 square feet of building and a parking lot of the size we require in this area due to competition from Baylor Hospital and the Meadows Foundation for available space. We are strongly opposed to Alignment option “C”. We feel Option “A” for the Good Latimer Expressway is the best choice for all parties. If Option “A” cannot be accomplished, then we still support Option “B”.

Sincerely,

Jay Teitelbaum
President

Quality Products thru Full-Line Vending
21 March 2002

Dallas Area Rapid Transit
1401 Pacific Avenue
Dallas, Texas 75266-7245

Attention: Mr. John Hoppie
DART Planning Project Manager

DART SouthEast Corridor
Environmental Impact Statement Study

Dear Mr. Hoppie:

I attended the Public Hearing on Tuesday, 12 March 2002, regarding the DART SouthEast Corridor.

I support DART in their plan to build a light rail line from Downtown Dallas to Fair Park and Pleasant Grove. The DART SouthEast Corridor line will be an excellent improvement for the City and the Metroplex.

As a property owner and business owner at the northeast corner of Gaston and Good-Latimer, I was not happy to learn that DART is now considering a third possibility for the alignment of the proposed light rail line on Good-Latimer. This third alignment shifts the light rail line and the Deep Ellum Station to the east side of Good-Latimer.

I am very much opposed to this possible third alignment, Option C, since it apparently will take away my building and property. It will also take away all or parts of other properties, including the historic Saint James AME Church, Adolph’s Coffee Service, Giddings & Wells Body Shop, Dallas Shared Housing Center and part of the Gaston Yards Apartments. Option C will seriously alter and adversely affect the nature and fabric of this neighborhood.

The two previous alignments, Options A and B, are better solutions to the location of the DART SouthEast Corridor light rail line along Good-Latimer. In my opinion, Option A down the center of Good-Latimer is definitely the best solution.

I strongly recommend that the DART staff and the DART Board take a firm stand in opposition to Option C as presented at the Public Hearing. I also recommend that DART reject Option C and give it no future consideration.

Respectfully submitted,

Charles F. Terry

DART SouthEast Corridor Letter
Tunnel Obstacle

Good-Latimer underpass shouldn’t delay rail

It would be tempting to say that Texas historians have a bad case of tunnel vision when it comes to an important phase of the Dallas Area Rapid Transit light rail system. But there is nothing humorous about the prospect of a planned DART rail line to Fair Park and southeast Dallas being delayed because the old Good-Latimer Expressway tunnel may be designated historic.

The tunnel, which was constructed in 1925, stands in the way of DART’s rail line route. The aging tunnel already has outlived its projected 50-year life span and is not situated in a way that could serve as the base for the transit line.

Yet an environmental review has brought a response from the Texas Historical Commission that the tunnel may be a candidate for the National Register of Historic Places.

The fact that the Good-Latimer Expressway tunnel was built to provide early-day automobiles a way to get under the railroad tracks on the east edge of downtown hardly justifies historic status. The blunt truth is that the tunnel is an undescript concrete connector.

Even the artwork that adorns the walls of the dimly lit tunnel is whitewashed every few years so that new murals can be painted.

DART officials now have to come up with costly and far less acceptable alternatives for the rail route. One proposal would require the demolition of several Deep Ellum businesses. Another would force DART to demolish as many as 24 fairly new apartment units.

The Federal Transit Administration, which will decide whether there is a “prudent way” to spare the tunnel, must move quickly when it receives all the facts. Further delays and added costs to the Fair Park line would be outrageous.

DART officials have negotiated in good faith with the Texas Historical Commission. And they have made an impressive offer to the artists, who have been involved in the mural project in the tunnel.

The transit agency will commit as much as $1.5 million to establish a ground-level site where murals and other artwork can be created in Deep Ellum. DART may even be willing to re-create a tunnel environment at the site.

But time is of the essence. The current schedule calls for the line that will serve Baylor Medical Center, Deep Ellum, Fair Park and southeast Dallas to be completed by 2007. That already is too long.

DART deserves the green light to find ways to speed up the completion day for this vital rail link — not slow it down.
LETTERS

Oscar and demographics

While it's great that Halle Berry and Denzel Washington won their Oscars, people are fooling themselves in thinking that their winning will open more doors in film for African-Americans. Hollywood is all about demographics; the desired demographic today is young, male and white. Moreover, studios are becoming increasingly dependent on the foreign market, which also skews much toward the same demographic.

Again, I think it's wonderful that Ms. Berry and Mr. Washington won because they were terrific in their respective roles. But I'm afraid that many great actors due to their race, age and gender — including blacks, Hispanics, and women — will continue suffering from a lack of good roles.

L. Postel, Dallas

DART's best route


Your editorial about the best route (Option A) for the planned DART rail line to Fair Park and southeast Dallas was correct in its conclusion and supports the position of the Meadows Foundation.

Based on our long-standing interest in this area, we expressed support for Option A at a recent DART public hearing. Option A will minimize disruption to existing businesses, prevent new residential developments along the route and safeguard an already designated historically significant building.

We have been involved in developing the neighborhood over the past 21 years through our creation of the Wilson Historic District. Among our most important projects was assembling the land at the corner of Good-Latimer and Live Oak for the Latino Cultural Center and gifting it to the city for construction of the facility. Option A will make this facility even more accessible to the public.

In addition, the historic Saint James A.M.E. Temple, which sits along Option C, was purchased and restored by the foundation in 1998. It now provides office space for nonprofit agencies serving the people of Dallas. It is one of the most significant African-American buildings in our city, designed by William Sidney Pittman, and financed and built by African-Americans. To encroach upon it with a rail line threatens its very existence, and would be a disservice to the memory of those who built it and disrespectful to the purpose of historic preservation.

Option A prevents this possibility. We are equally concerned that Options B and C will force businesses along these routes to close or relocate, and require the exercise of eminent domain to acquire the needed property. Such options do not appear prudent in light of the unnecessary expenditures and the disruption of businesses that create jobs, generate taxes and contribute to the economic vitality of the neighborhood.

We appreciate the difficult task before DART and our City Council in determining the best route for this much-needed rail line linking downtown with Fair Park and southeast Dallas. We firmly believe that extending the route down the middle of Good-Latimer (Option A) is the most prudent and feasible of all options.

Linda P. Evans, president and CEO, The Meadows Foundation, Dallas

Don't belittle mayor

To me your piece, "Dear Ms. Fix-it," March 24, seems just an attempt to belittle Mayor Laura Miller's real agenda.

Would you have done a similar article if Tom Dunning were mayor, equally trivializing his plans? I don't think so.

Hal Fish, Dallas

LETTERS POLICY

We value letters from readers. We receive far more than we can print so we publish a representative sample. Letters are edited for length and clarity. Please include your name, address with ZIP code along with a daytime phone number. Letters become the property of The Dallas Morning News.

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April 5, 2002  

Mr. John Hoppie  
Southeast Corridor Project Manager  
DALLAS AREA RAPID TRANSIT  
P.O. Box 660163  
Dallas, Texas 75266-0163  

RE: Good Latimer Tunnel  
City of Dallas Landmark Commission Decision  

Dear Mr. Hoppie:

On April 1, 2002 the Landmark Commission discussed and resolved to provide its decision related to the National Register eligibility of the Good Latimer Tunnel. The Landmark Commission voted and approved to provide the following language to you:

"The Dallas Landmark Commission concurs with the Texas Historical Commission that the Good Latimer Tunnel is eligible for the National Register listing as a contributing structure as part of a potential Multiple Property listing of the circa 1930 citywide transportation and Trinity River improvements. The Landmark Commission resolves to request consulting party status, if there is a Section 106 review to DART and the FTA, and further requests a delay of the April 8th Section 4(f) comment period to allow the Landmark Commission to provide comments."

Please provide information to the Landmark Commission as how to these processes will proceed given our request. Thank you for working with the Landmark Commission. You can reach me at 214/340-9210 if you have any questions or contact Jack Guerra at 214/670-3620 for any information that can be distributed.

Sincerely,

Allison Reaves-Poggi, Chair  
City of Dallas Landmark Commission  

C: Leif Sandberg, Manager, Department of Planning and Development  
John Rogers, Assistant City Attorney, City Attorney’s Office  
Jack Guerra, AICP, Chief Planner, Historic Preservation Section  
John Sweek, FTA Regional Contact  
Federal Transit Administration Region 6, 819 Taylor Street, Room 8A36, Fort Worth, TX 76102  
F. Lawerence Oaks, Executive Director, Texas Historical Commission, P.O. Box 12276, Austin, TX 78711-2276
April 5, 2002

John Hoppie  
System Planning Manager  
Dallas Area Rapid Transit  
P.O. Box 660163  
Dallas, TX  75266-7245

RE: Southeast Corridor Draft Environmental Impact Statement (DEIS)  
Dallas Area Rapid Transit, February 2002

Dear Mr. Hoppie:

Preservation Dallas submits this letter as comment on the recently released Draft Environmental Impact Statement regarding the proposed alignment of the Southeast Corridor of the Dallas Area Rapid Transit. This letter follows correspondence submitted by Preservation Dallas to DART on July 24, 2001. We respectively request that this document be entered into the public record on the Draft Environmental Impact Statement.

The Board of Trustees of Preservation Dallas believes that the tunnels are significant for their historical association with the Ulrickson Committee Report of 1925-27 as well as a neighborhood landmark and palette for public art. In our letter of July 2001, we encouraged DART to explore alternatives to demolition and removal of the tunnels. We understand that the Draft Environmental Impact Statement proposes two alternatives and a third alternative is presented in response to the State Historic Preservation Officer’s letter of February 1, 2002.

We believe that all of three alternatives fail to adequately address concerns for the historic resources in the vicinity of the Deep Ellum tunnels. As the city’s primary advocacy organization for historic preservation and inner city living, we are concerned about the historic properties and neighborhood assets as well as long-term economic viability in the area. The Board of Trustees of Preservation Dallas believes that other alternatives may be possible for the Good-Latimer Expressway in order to avert demolition and meet the goals of the community.

Thank you for your consideration of this letter. Please keep us informed as DART prepares its final plans for the Deep Ellum station.

Sincerely,

Marcel Quimby, FAIA  
President

R. Dabney Tompkins  
Chair, Preservation Issues
I am opposed to option C and in favor of option A.
**COMMENT CARD**

**Southeast Corridor Environmental Impact Statement Study**

**Name/Nombre:** RJ Smith

**Address/Dirección:** 526 Golden Meadows

**City/Ciudad:** Duncanville TX

**Zip Code:** 75116

**Telephone/Teléfono:** (972) 780-9728

**Comments/Comentarios:**

I am against Option C.
I prefer Option A or B.
If A cannot be done.

---

**COMMENT CARD**

**Southeast Corridor Environmental Impact Statement Study**

**Name/Nombre:** Larry Carter

**Address/Dirección:** 730 W. Church

**City/Ciudad:** Grand Prairie

**Zip Code:** 75050

**Telephone/Teléfono:** (972) 262-7706

**Comments/Comentarios:**

I am against Alignment Option C.

Alignment Option A seems to be the best choice for the good Lamar Expressway Area.

Thanks,

Larry Carter
Southeast Corridor Environmental Impact Statement Study

**Comment Card**

Name/Nombre: **Fred Earley**
Address/Dirección: **2713 Willywood**
City/Ciudad: **Garland Texas**
Zip Code: **75040**
Telephone/Teléfono: **(972) 414-0760**

Comments/Comentarios:
I think the tunnel to Deep Elm is dangerous and a bad idea. People don't even walk through it at night or even in the day time. And if it can't go through the tunnel it will take away building that people work in. I think it will cost the city more money by not going through the tunnel.

**Comment Card**

Name/Nombre: **James Harrison**
Address/Dirección: **2510 N Hwy 175**
City/Ciudad: **Seagoville**
Zip Code: **75159**
Telephone/Teléfono: **(469) 270-3708**

Comments/Comentarios:
OPPOSED TO
OPTION C
FOR THE GOOD CATHEDRAL EXP.

**Comment Card**

Name/Nombre: **A. Teitelbaum**
Address/Dirección: **5200 Keller Springs**
City/Ciudad: **Dallas TX**
Zip Code: **75248**
Telephone/Teléfono: **(972) 233-5479**

Comments/Comentarios:
Believe in my opinion, OPTION "C" is too costly and would be too time consuming.

"A" is my preference as least expensive and most practical.
Council backs closing mural-lined tunnel for light rail

By DAVE MICHAELS
Staff Writer

DART secured an important endorsement for a future light-rail route Monday when the Dallas City Council agreed to support an alignment that would close the historic Good-Latimer Expressway tunnel.

Council members did not take a formal vote, but nine members said they were convinced that sealing the mural-lined tunnel was the best way to complete the Deep Ellum station for the Southeast Corridor alignment.

"It was clear that committee members supported filling in the tunnel," said council member Sandy Greyson, chairwoman of the transportation committee that heard Monday's presentation.

"The city and DART took extra time to thoroughly look at the significance of that tunnel. It was not a hasty decision." On May 13, Ms. Greyson's committee will consider the language of a resolution supporting Dallas Area Rapid Transit's plan. The full council will vote on the resolution May 22.

The City Council's backing is not required for DART to begin building its route over the tunnel, which was constructed in 1930 as part of Dallas' first major public works campaign. It has been known more recently for the bright and varied murals that drape its walls and provide a colorful connector between Deep Ellum and East Dallas.

The Deep Ellum Association is also supporting DART's plan, after months of opposing it. Hurdie Fark, the executive director, said DART's offer to pay $1.5 million toward a new gateway for Deep Ellum -- that would use local artists the same way the tunnel projects did -- helped persuade many owners to support the alignment.

The city's support probably improves DART's case before the Federal Transit Administration, which has to bless the project because the tunnel is eligible for inclusion on the National Register of Historic Places.

"Since there are two city of Dallas roadways, and they are responsible for the tunnel, their support goes a long way in our argument that there is not a prudent or feasible alternative," said John Hoppes, the project manager for DART's Southeast Corridor.

"The council vote next month is basically a formality, because several members who had expressed doubts about closing the tunnel now support the DART proposal," Council member Veletta Forrest said. Ms. Forrest said she thought closing the tunnel -- dubbed Option A by DART officials -- was preferable to two plans that would have threatened other historic structures.

One of those options would have required running the DART line close to the St. James AME Temple Church, acquiring property from several businesses and running them, and taking out 24 units at the Gaston Yard apartments. The other would have squeezed seven businesses, several loft apartments and run too close to another historic building, the Union Bankers business.

"Option A is the best in terms of preserving our other resources and from an urban design perspective," Ms. Forrest said.

"When it comes to replacing people and businesses, I would rather the tunnel go," Mr. Burk said.
WHEREAS, on May 28, 1997, a Thoroughfare Plan Amendment was passed by the City Council for the City of Dallas that established a special four-lane divided cross section to accommodate light rail transit (LRT) in the median of Good-Latimer Expressway from Bryan Street to the DART-owned Union Pacific (UP) railroad right-of-way; and,

WHEREAS, on December 15, 1999, a resolution was passed by the City Council of the City of Dallas endorsing the Southeast Corridor Major Investment Study preferred alignment with LRT in the median of Good-Latimer Expressway; and,

WHEREAS, Dallas Area Rapid Transit (DART) has completed the Southeast Corridor Draft Environmental Impact Statement (DEIS) with a 45-day public comment period from February 22, 2002 through April 8, 2002; and,

WHEREAS, the DEIS assessed the impacts of a LRT line extending northeast from the existing Pearl Street Station along Bryan Street to Good-Latimer Expressway, south on Good-Latimer Expressway to the Union Pacific Railroad right-of-way before continuing south and east along Parry Avenue to Fair Park and the Southern Pacific Railroad right-of-way to Pleasant Grove; and,

WHEREAS, in the Southeast Corridor, DART has identified three alignment options along Good-Latimer Expressway (Option A, Option B and Option C) with a station to serve Deep Ellum and the Latino Cultural Arts Center; and,

WHEREAS, Option A requires filling the Deep Ellum Tunnel to bring Good-Latimer Expressway up to an at-grade intersection with Gaston Avenue while Options B and C would maintain the existing tunnel and grade separation between Good Latimer Expressway and Gaston Avenue; and,

WHEREAS, Option A conforms to the Thoroughfare Plan by placing light rail in the median of Good-Latimer Expressway while maintaining four lanes of traffic and would not displace any businesses or residents; and,

WHEREAS, Option B differs from the Thoroughfare Plan by diverting the LRT line from the median of Good-Latimer Expressway to the west side of the street to cross Gaston Avenue at-grade before spanning over the tunnel on aerial structure, would require the displacement of seven businesses and eight residential units, and could adversely affect the potential for future redevelopment of City of Dallas landmark designated property; and,

WHEREAS, Option C differs from the Thoroughfare Plan by diverting the LRT line from the median of Good-Latimer Expressway to the east side of the street to cross Gaston Avenue at-grade, would require the displacement of 24 residential units and five commercial properties, and would compromise the access of a City of Dallas landmark designated property; and,
WHEREAS, the Deep Ellum Tunnel is eligible for the National Register of Historic Places, but is in poor structural condition and is no longer needed to facilitate vehicular traffic in the area; and,

WHEREAS, removal of the Deep Ellum Tunnel would have the least impact considering the numerous historic resources in the area, and would have the greatest potential to promote redevelopment, improve vehicular and pedestrian safety and enhance access to the LRT station.

Now, Therefore,

BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF DALLAS:

Section 1. That the City Council supports DART's Southeast Corridor LRT alignment Option A that fills the Deep Ellum Tunnel and places light rail transit in the median of Good-Latimer Expressway between Bryan Street and the DART-owned Union Pacific Railroad right-of-way.

Section 2. That this resolution shall take effect immediately from and after its passage in accordance with the provisions of the Charter of the City of Dallas and it is accordingly so resolved.

Distribution: Public Works and Transportation, Sandra Williams, OCMC, Room 101
Public Works and Transportation, Carol Alexander, L1BN
City Attorney
Office of Financial Services

APPROVED BY
CITY COUNCIL
MAY 22 2002

Sharyn Gery
City Secretary

APPROVED
HEAD OF DEPARTMENT

APPROVED
CITY CONTROLLER

APPROVED
CITY MANAGER
August 15, 2002

John Hoppie  
Systems Planning Manager  
Dallas Area Rapid Transit  
P.O. Box 660163  
Dallas, TX 75266

RE: Mitigation for Deep Ellum/Good Latimer Tunnel

Dear Mr. Hoppie:

In March 2002, DART released a Draft Environmental Impact Statement offering two options for development of a Deep Ellum rail station. Option A requires the removal of the Deep Ellum or Good Latimer Tunnel. In a decision subsequent to the public release of the Draft EIS, the State Historic Preservation Office determined the tunnel eligible for listing in the National Register of Historic Places.

We understand that DART will initiate and hold additional public hearings to determine appropriate management of the environmental and historical issues under Section 4F of the Federal Transportation Act.

If Option A is determined to be the most prudent and feasible alternative, we support the mitigation of the tunnels in the following ways:

- Documentation by measured drawings to a Level I of Historic American Engineering Record (HAER) for transportation structures depicting existing and historic conditions;

- Level I photographs with large-format negatives of exterior and interior views and a written history and description;

- Documentation and a written narrative that places the tunnel and the remaining elements of the system in the context of the community development of Dallas as stated in the letter of eligibility from the Texas Historical Commission;

- Development of a community committee to work through acceptable urban design opportunities to retain a gateway that is separate from the Deep Ellum station;

- Retain significant pieces of the tunnel fabric for placement in a local and public setting with appropriate interpretation.
The future development in the vicinity of the proposed Deep Ellum station is an
unequaled opportunity to incorporate several highly significant historic properties (St.
James AME and the Union Bankers/Knights of Pythias) into an exciting urban space.
The DART commitment for $1.5 million for art in a gateway area will add a creative
element with a unique neighborhood expression. This opportunity demands a
coordinated community effort that we are committed to lead.

Please consider this as our support for the DART project and to the future development
of the neighborhood. If you have any questions, please contact us.

Sincerely,

Alice Murray
President
Preservation Dallas

Linda Evans
CEO
Meadows Foundation of Texas

Michael Caine
President
Deep Ellum Association

Christopher G. Lowden
President
Friends of Fair Park
November 17, 2000

Reference: DART Northwest Line to Carrollton EIS
DART Southeast Corridor EIS

Dear Agency Representatives:

Dallas Area Rapid Transit (DART) has recently initiated efforts to prepare an Environment Impact Statement (EIS) for both of the above-referenced projects. Both projects have completed Major Investment Studies (MIS), arriving at a Locally Preferred Investment Strategy featuring Light Rail Transit (LRT) recommendations. The Federal Transit Administration (FTA) has authorized DART to commence this phase of project development, issuing a Notice of Intent to Prepare an EIS in the Federal Register on Friday, November 3, 2000.

Public Scoping Meetings for these two projects have been announced for late November (Southeast Corridor) and early December (Northwest Corridor). These meetings are detailed in the accompanying Notices of Intent.

For the purposes of initiating interagency coordination with federal, state, and local agencies, DART is conducting an Interagency Coordination Meeting during the Scoping period. You are invited to attend this meeting, scheduled for the following time and location:

DART Interagency Scoping Meetings
December 6, 2000
DART Board Conference Room 1C, First Floor
1401 Pacific Avenue
Dallas, Texas 75201
10:00 a.m. - 12 noon — Southeast Corridor EIS
12 noon - 1:00 p.m. — Lunch (provided by DART)
1:00 p.m. - 3:00 p.m. -- Northwest Line to Carrollton EIS

You will note from this schedule that we are planning for a full day of activities in order to kick off these two important regional transportation projects. Lunch will be provided. It is our hope that you will make the time to attend these meetings so that we can initiate these projects with the fullest information possible.

In order to provide you with background prior to these meetings, we are including with this letter Scoping Information Reports for both projects. These documents highlight the potential environmental, land use and transportation issues associated with each
project. Where applicable, information from the preliminary *Environmental Baseline Reports* prepared during the MIS phase is attached to provide additional information for each corridor. Your early input on these issues, as well as your assistance with identifying other issues not included, would be greatly appreciated.

If you are not able to attend the meeting, but have information or comments that will be useful for the environmental process, please forward the information to the respective Project Manager at your earliest convenience.

If you have any questions, please contact either of us. We look forward to seeing you at the meetings.

Sincerely,

John Hoppie  
Southeast Corridor Project Manager  
214/749-2525  
jhoppie@dart.org

Kay Shelton, AICP  
Northwest Corridor Project Manager  
214/749-2841  
kshelton@dart.org

Attachments  
- Notice of Intent (SE and NW)  
- Scoping Information Report (SE and NW)
Mr. James Steely  
Deputy State Historic Preservation Officer  
Texas Historical Commission  
P.O. Box 12276  
Austin, Texas 78711-2276

Mr. Joe Swick  
Environmental Protection Agency  
1445 Ross  
Dallas, Texas 75202

Mr. Wayne Lea  
Chief Regulatory Branch  
U.S. Army Corps of Engineers  
P.O. Box 17300  
Fort Worth, Texas 76102-0300

Mr. Melvin Lewis  
Regional Director  
TNRCC  
1011 E. Arkansas Lane  
Arlington, Texas 76010-6499

Ms. Nan Terry  
Environmental Specialist  
Federal Aviation Administration  
2601 Meacham Boulevard  
Fort Worth, TX 76193

Mr. David Visney  
Regional Manager  
Federal Railroad Administration  
8701 Bedford-Euless Road, Suite 425  
Hurst, TX 76053

Mr. Jesse Balleza  
Community Planner  
Federal Transit Administration Region VI  
819 Taylor Street, Room 8A36  
Fort Worth, TX 76102

Mr. Bob Short  
United States Fish and Wildlife Service  
711 Stadium Drive, Suite 252  
Arlington, TX 76011

Mr. Roy Frye  
Texas Parks and Wildlife Department  
4200 Smith School Road  
Austin, TX 78744

Ms. Elvia Gonzalez  
Environmental Division  
Texas Department of Transportation  
125 E. 11th Street  
Austin, Texas 78701-2483

Mr. Bruce Nolley  
Texas Department of Transportation  
P.O. Box 133067  
Dallas, Texas 75313-3067

John Brunk, PE  
City of Dallas, Public Works & Transportation  
City Hall, Room L1BN  
1500 Marilla Street  
Dallas, TX 75201

Mr. Irvin Griffin  
Senior Project Manager  
Dallas County, Dept of Public Works  
411 Elm Street, 4th Floor  
Dallas, TX 75201

Mr. Jim Anderson  
City of Dallas Landmark Commission  
Planning & Development – 5CN  
1500 Marilla Street  
Dallas, TX 75201

Mr. Steve Rollins  
Director of Planning  
Denton County  
306 N. Loop 288, Suite 114  
Denton, Texas 76209-4887

Mr. Terry Mitchell  
Asst. Director of Aviation  
City of Dallas Aviation Department  
LB 16, Love Field Terminal Building  
Dallas, TX 75235

Richard Gehring  
TxDOT, Dallas District  
9700 E. R.L. Thornton Fwy  
PO Box 3067  
Dallas, TX 75221-3067

Mr. Dave Davis  
City Traffic Engineer  
City of Farmers Branch  
13000 Wm. Dodson Parkway  
Farmers Branch, TX 75234

Cesar Molina, PE  
Transportation Department  
1945 E. Jackson Road  
PO Box 110535  
Carrollton, Texas 75011-0535

Ms. Glenna Taite  
Dallas Independent School District  
3700 Ross Avenue  
Dallas, TX 75204

Mike Germany/Ginny Melara  
Transportation Department  
Carrollton-Farmers Branch ISD  
1445 North Perry Road  
Carrollton, TX 75007

Ms. Mary Phinney, Administrator  
Dallas County Parks and Open Space Program  
411 Elm Street  
Dallas, TX 75202

Mr. Willis Winters  
Asst Director of Planning & Dev.  
Dallas Parks Department  
1500 Marilla Street, 6FN  
Dallas, TX 75201

Mr. Peer Chacko  
Chief Planner  
City of Dallas Planning  
1500 Marilla Street, 5CN  
Dallas, TX 75201

Mr. Andy Carroll  
DART Project Manager  
City of Dallas Public Works  
1500 Marilla Street

Alan Hendrix  
City of Dallas, Public Works  
City Hall, Room L1BN  
1500 Marilla Street  
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Shon Merryman  
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1945 E. Jackson Road  
PO Box 110535  
Carrollton, Texas 75011-0535

Christopher Barton  
Chief Planner  
1945 E. Jackson Road  
PO Box 110535  
Carrollton, Texas 75011-0535
Mr. Eddie Hueston
Fair Park Administration
P.O. Box 15909
Dallas, TX 75315

Ms. Yvonne Washington
Fair Park Administration
P.O. Box 15909
Dallas, TX 75315

Ms. Renee Riggs
The Dallas Plan
City of Dallas
1500 Marilla
6BN
Dallas, TX 75201

Mr. Don Cranford
Dallas County
Department of Public Works
411 Elm Street
4th Floor
Dallas, TX 75201

Ms. Jan Didear
Dallas Independent School District
3700 Ross Avenue
Dallas, TX 75204

Ms. Rebecca Dugger
City of Dallas
Trinity River Project
June 13, 2001

Ms. Linda Roark  
Preservation Consultant  
Division of Architecture  
Texas Historical Commission  
P.O. Box 12276  
Austin, Texas 78711-2276

Dear Ms. Roark:

Attached are two technical memoranda regarding selected issues in DART’s Southeast LRT extension related to Section 106 of the Historic Preservation Act of 1966. Both of these memoranda will be incorporated into a letter requesting formal concurrence for a determination of eligibility for all properties along the Southeast Corridor and will eventually serve as a foundation for a Determination of Effects report.

The memorandum regarding the Deep Ellum Tunnel is being forwarded to you for your information since it our understanding that others have contacted you concerning our proposal to demolish to tunnel.

The memorandum regarding Fair Park is being forwarded to you to serve as early coordination. Fair Park is a National Historic Landmark and the most significant historic entity encountered along the Southeast Corridor LRT line. On May 30, 2001, DART held a Charrette to determine how to best integrate a DART LRT Station with the historic entrance to Fair Park and reintroduce a transit element to the area. Participants included the Dallas Landmark Committee, Friends of Fair Park, Dallas Parks Department and representatives of the various venues at Fair Park.

We would like to come to Austin to meet with you at your earliest convenience to discuss these issues. Steve Salin will be contacting you to schedule a meeting. Should you have any questions, Steve can be reached at (214) 749-2828, or I can be reached at (214) 749-2525.

Sincerely,

[Signature]
John Hoppie  
Project Manager  
Corridor and Environmental Planning

Enclosures  
c: Steve Salin  
Tom Ryden
September 14, 2001

Mr. F. Lawerence Oaks
State Historic Preservation Officer
Texas Historical Commission
P.O. Box 12276
Austin, Texas 78711-2276

Attn: Ms. Linda Roark

Re: Southeast Corridor Light Rail Project
    Request For Determination of Eligibility Report

Dear Mr. Oaks:

I am pleased to transmit for your review and concurrence two copies of the Request for Determination of Eligibility Report for the referenced project. The Federal Transit Administration (FTA) has determined that the proposed DART Southeast Corridor Light Rail Transit Project in Dallas, Texas, is an undertaking as defined in 36 CFR 800.16(y) because it has the potential to cause effects on historic properties and, therefore, requires compliance with Section 106 of the National Historic Preservation Act as amended (Section 106, 16 U.S.C. 470f) and its implementing regulations (36 CFR Part 800).

This Request for Determination of Eligibility Report provides a description of the project, identifies the Area of Potential Effects (APE), reviews the identification efforts, describes the historical context of the corridor, and provides FTA and DART's determination of eligibility.

In accordance with 36 CFR 800.4(c)(2), FTA and DART are seeking SHPO concurrence with its determination of eligibility for listing in the National Register of Historic Places of properties within the Southeast Corridor APE. Following your concurrence, the report will be incorporated into this project's Final Environmental Impact Statement. All comments provided by the SHPO will be included.
Mr. F. Lawrence Oaks
September 14, 2001
Page 2

Thank you for your timely attention to this matter. Please call me at (214) 749-2828 or John Hoppie, Southeast Corridor Project Manager, at (214) 749-2525, if you have any questions.

Sincerely,

Steve Salin
Senior Manager
Corridor and Environmental Planning

enclosures

c w/o: Jesse Balleza
      Tom Ryden
      John Hoppie
      Tom Shelton, C&B
      Willene Watson
September 17, 2001

Mr. Steve Salin
Dallas Area Rapid Transit
P.O. Box 660163
Dallas, Texas 75266-0163

Re: Project review under Section 106 of the National Historic Preservation Act
Proposed Southeast Corridor LRT, Dallas Area Rapid Transit,
Dallas, Dallas County (FTA/106)

Dear Mr. Salin:

Thank you for meeting with Texas Historical Commission (THC) staff to provide preliminary project information on DART's Southeast Corridor LRT, including the proposed Fair Park station. This letter serves as initial comment on the proposed Fair Park station design from the State Historic Preservation Officer, the Executive Director of the THC.

As discussed in our meeting August 14, the THC is concerned that construction of a DART station in front of the main Fair Park entrance has the potential to affect this National Historic Landmark. We understand that this is a convenient location for the public, and would be of special benefit for those attending the State Fair. As you know, Section 110 of the National Historic Preservation Act requires federal agencies to minimize harm to such National Historic Landmark properties. As discussed, we look forward to receiving a draft agreement document for the overall undertaking.

It is fortunate that there is a design opportunity for this project, related to the ticket buildings constructed for the Centennial Fair, but demolished in subsequent years. We recommend relatively accurate reconstruction of the historic ticket buildings in their historic location, understanding that security is a concern and that the design will need to be based on historic photographs, since the original plans are not available. We recommend that other structures not be placed in on the central axis of the historic entrance gate.

Design of the accessible platforms, and platforms for the other side of the tracks, should be as minimal and transparent as possible, and they should be placed as far from the central entrance axis as possible; preferably to the north of the central axis. There should be a total of five structures: the two reconstructed ticket buildings, two accessible platforms and one additional shelter. The three structures that are not reconstructions of the historic ticket buildings should be compatible with the historic ticket buildings and
September 17, 2001
Fair Park Station, DART SE Corridor
Page 2 of 2

design vocabulary of Fair Park. The plaza design should also be compatible. As we
discussed, concrete should be used rather than pavers and lighting should be worked into
reconstructed historic features (ticket booths, flag/light structures, catenary poles).

We hope to maintain a partnership that will foster effective historic preservation. Thank
you for your cooperation in this federal review process, and for your efforts to preserve
the irreplaceable heritage of Texas. If you have any questions concerning our review
or if we can be of further assistance, please contact Linda Roark at 512/463-9122.

Yours truly,

[Signature]

F. Lawrence Oaks, State Historic Preservation Officer

cc: Jim Anderson, Dallas CLG
    Jeff Dunn, Dallas County Historical Commission

FLO/LR
October 24, 2001

Steve Salin
Corridor and Environmental Planning
DART
PO Box 660163
Dallas, TX 75266-0163

Re: Project review under Section 106 of the National Historic Preservation Act of 1966: DART Southeast Corridor, Dallas, Dallas County, Texas (N10, N20, N25)

Dear Mr. Salin:

Thank you for your correspondence describing the above referenced undertaking. Section 106 of the National Historic Preservation Act requires federal agencies, or their designated representatives, to take into account the effects of their undertakings on historic properties. Federal agencies, or their designated representatives, must request the comments of this office when they are considering an action, or if they are assisting, permitting, or licensing an action that may affect archeological sites or historic buildings. Under the Antiquities Code of Texas, state agencies and political subdivisions of the State are required to contact us relative to actions on non-federal public lands in the State of Texas.

The Texas SHPO needs additional information before we can provide comment on this undertaking. While the documentation of buildings in the project area appears adequate, the report featured no information about the Good-Latimer Tunnel, other than a reference on page 3. The tunnel may be eligible for listing in the National Register. Please send photographs of the tunnel and other transportation-related features along the proposed DART alignment (including other tunnels, bridges, overpasses), along with a written history and your assessment of these properties' eligibility for listing in the National Register. Texas Historical Commission staff will review all properties in the project area after this information is received.

Thank you for your interest in the cultural heritage of Texas, and for your compliance with this federal review process.

Sincerely,

Gregory W. Smith
National Register Coordinator
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November 7, 2001

Mr. F. Lawrence Oaks  
Executive Director  
Texas Historical Commission  
P.O. Box 12276  
Austin, Texas 78711-2276

Attention: Gregory W. Smith

Re: Project review under Section 106 of the National Historic Preservation Act of 1966: DART Southeast Corridor, Dallas, Dallas County, Texas (N10, N20, N25)

Dear Mr. Oaks:

Thank you for your correspondence of October 24, 2001 regarding the above referenced undertaking. Attached is the additional information that you requested. This Supplemental Request for Determination of Eligibility Report contains the requested information and pictures of the Good-Latimer Underpass, as well as, other transportation-related features along the DART alignment. In addition, the report contains amended Table 3 and 4 from the original Request for Determination of Eligibility submitted in September 2001.

Please be advised that Mr. W. Dwayne Jones, Executive Director of Preservation, has volunteered to review or original submittal. Based on his comments we may submit additional revisions. If this is the case, we will repackage the original and supplemental report and submit it as one amended document in the very near future. However, as time is of the essence, we would appreciate your prompt consideration of the transportation-related features, especially the Good-Latimer Underpass, contained in this report.

Should you wish to discuss issues related to the Southeast Corridor LRT Project please contact me at (214) 749-2828.

Sincerely,

Steve Salin  
Senior Manager  
Corridor and Environmental Planning

Enclosures

c: Jesse Balleza, FTA  
W. Dwayne Jones, Preservation Dallas  
Tom Ryden  
John Hoppie
February 1, 2002

Stephen L. Salin, AICP
Senior Manager
Corridor and Environmental Planning
Dallas Area Rapid Transit
P.O. Box 660163
Dallas, TX  75266-0163

Re: Project review under Section 106 of the National Historic Preservation Act of 1966,
DART Southeast Corridor, Dallas, Dallas County, Texas

Dear Mr. Salin:

Thank you for submitting additional information on the Good-Latimer Underpass for our review of the above referenced project. This letter serves as comment from the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission (THC).

The THC review staff, led by Peter Ketter, has evaluated the “Supplemental Request of Determination of Eligibility” dated December 2001, and would like to provide the following comments.

The information contained in your report sufficiently establishes the significance of the Good-Latimer Underpass (“Deep Ellum Tunnel”), and it is ELIGIBLE for listing on the National Register of Historic Places. As the report acknowledges, the 1930 construction of the underpass was part of the city’s broad program of infrastructure improvements undertaken in accordance with the Ulrickson Committee Report of 1925-27. The Ulrickson Report was a comprehensive plan for city improvements, the majority of which focused on the city’s transportation network. The implementation of that plan was most certainly a significant event in the history of transportation in Dallas as well as the development of the city as a whole. The Good-Latimer Underpass is itself historically significant as an integral and vital component of important parts of the plan, including the connection of Pacific and Gaston Avenues, the connection of Good and Latimer Streets and grade separations between vehicular and rail traffic. The fact that the Good-Latimer Underpass is one of only a few remaining underpasses built in the manner and location indicated in the Ulrickson plan (page 3 of December 2001 report) only adds to its significance. It is therefore eligible under Criterion A, in the areas of Transportation and Community Planning and Development.

As an original component of the Central Expressway, the 1952 addition to the underpass further illustrates the progressive development of transportation strategies in Dallas and warrants extending the structure’s period of significance to 1952. The integrity of the 1930 section was not significantly compromised by the addition, and the two phases are easily distinguishable. The original part was left largely intact and still clearly illustrates its historic function, to separate both pedestrians and two directions of vehicular traffic from the cross traffic above. The 1952 addition is also identifiable with its purpose and reflects changing trends in transportation planning, which focused on moving larger volumes of traffic at higher speeds. The removal of rail lines from above has not significantly altered the feeling, association or setting of the underpass. The structure is still readily identifiable with its significance in the development of Dallas’s transportation network.
We look forward to assisting you in finding appropriate measures to insure the preservation of the Good-Latimer Underpass and the other eligible historic properties in the APE of the Southeast Corridor Light Rail Transit Project. Please contact Linda Roark, Division of Architecture, at (512) 463-9122, for determinations of effect and any further coordination regarding the eligible properties.

We look forward to further consultation with your office and hope to maintain a partnership that will foster effective historic preservation. Thank you for your cooperation in this federal review process, and for your efforts to preserve the irreplaceable heritage of Texas. If you have any questions concerning our review, please contact Peter Ketter at (512) 463-5942 or Linda Roark.

Sincerely,

F. Lawrence Oaks, SHPO

cc: W. Dwayne Jones, Preservation Dallas
Jim Anderson, City of Dallas
Linda Roark, THC Division of Architecture
February 20, 2002

Mr. Steve Salin  
Dallas Area Rapid Transit  
P.O. Box 660163  
Dallas, Texas  75266-0163

Re:  Project review under Section 106 of the National Historic Preservation Act  
Proposed Southeast Corridor, Fair Park Station, Dallas Area Rapid Transit, 
Dallas, Dallas County (FTA/106)

Dear Mr. Salin:

Thank you for providing us with additional information and meeting to discuss the proposed Fair Park station design. This letter serves as initial comment on the proposed Fair Park station design from the State Historic Preservation Officer, the Executive Director of the THC.

As we discussed recently on the telephone, we appreciate receiving the computer renderings produced by DART to demonstrate various design possibilities for this station, and your intent to approach this project adjacent to Fair Park, a National Historic Landmark, with the greatest design sensitivity possible.

After reviewing the various renderings provided, we concur that placement of the canopies in the location of the two historic ticket booths, with an additional set of two canopies directly in front of those, would be the more compatible siting and offer less obstruction of the historic park entrance features. These four canopies would be of similar in size and shape to the historic ticket booths. The accessible canopies would be of very simple transparent design, located out from the other canopies, as proposed. We recommend that the eastbound and westbound canopies be the same design, rather than trying to differentiate with styles between the historic ticket booth locations and the new canopy locations. As discussed earlier, documentation clarifying the site's history could be provided with information incorporated into the station's design and with signage.

We concur with the proposed transparency of the preliminary canopy design, with somewhat heavy columns supporting a roof that recalls that of the historic ticket booth design. As we discussed, the columns offer an opportunity to do compatible bas relief designs within the scope of the public art component of the project, and there are also design possibilities for the floor that might incorporate interpretation of the historic ticket building and site configurations.
We look forward to reviewing further design developments for this station portion of the project, including development of the public art component. Our continued general recommendation is for simple compatible features that blend with the character of existing historic park features, as discussed and preliminarily indicated in the rendering: concrete paving that is colored to differentiate track and pedestrian crossing areas, where necessary; simple bollards spaced as far apart as possible to reduce their number; simplified light standards based on the historic park design, etc.

We hope to maintain a partnership that will foster effective historic preservation. Thank you for your cooperation in this federal review process, and for your efforts to preserve the irreplaceable heritage of Texas. If you have any questions concerning our review or if we can be of further assistance, please contact Linda Roark at 512/463-9122.

Yours truly,

[Signature]

Linda Roark
for: F. Lawerence Oaks, State Historic Preservation Officer

cc: Jim Anderson, Dallas CLG
    Jeff Dunn, Dallas County Historical Commission

FLO/LR
March 21, 2002

Mr. John Hoppie
Dallas Area Rapid Transit
P.O. Box 660163
Dallas, Texas 75266-0163

Re: Project review under Section 106 of the National Historic Preservation Act of 1966
DART Southeast Corridor Draft Environmental Impact Statement (DEIS),
Dallas, Dallas County (FTA/106)

Dear Mr. Hoppie:

Thank you for providing our office with documentation regarding the subject project. This letter serves as comment on the proposed undertaking from the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission.

The review staff, led by Linda Roark, has completed its review of the DART Southeast Corridor Draft Environmental Impact Statement (DEIS) and has the following comments and recommendations:

- We do not have enough information at this time to complete review of the proposed "no adverse effect" determinations offered, and it appears that modifications to the proposed work (e.g., option C) may influence these determinations. However, we are concerned that the potential exists for adverse effects on some historic properties and need more information regarding the proposed design and location of the project as it relates to historic properties. For example:
  - The Knights of Pythias Temple at 2551 Elm Street is noted in the "visual and aesthetic impacts" section to receive significant impacts from either option A or B. The potential exists that such significant impacts could adversely affect the Temple.
  - If an elevated structure is proposed adjacent to Fair Park, to cross over R. B. Cullum Boulevard, there is a potential for an "adverse effect" on Fair Park.

- We are concerned that the analysis of anticipated effects is confusingly written. For example, it is variously stated that the undertaking both will and will not have an "adverse effect" on the Good-Latimer Tunnel under the various criteria of effect examined. If the undertaking would have an "adverse effect" under one criterion, it is confusing to state that there is "no adverse effect" for the same action under another criterion. Additionally, the statement that option A (burying the Good-Latimer Tunnel) and option B (constructing an elevated track over the Tunnel) would not adversely affect the Tunnel appears to be inaccurate from the information provided. We understand that there is third option (C) being considered, for which no information is included in the DEIS.
The analysis of anticipated effects includes only those effects listed in 36 CFR Part 800 as examples of adverse effects. It should be considered that other adverse effects are possible, including those that may be cumulative, or remote in distance or time.

Appendix E, Section 4(f) Evaluation: Section E3.6, regarding the Texas Antiquities Code, states that “(o)wner consent for designation of privately owned properties is not required.” Owner consent for designation of publicly owned properties is not required, but is required for privately owned properties.

We continue to recommend that an agreement document be developed to guide the review of this undertaking in regard to work that could affect the historic character and integrity of historic properties, and look forward to further consultation with your office. Thank you for your cooperation in this federal review process, and for your efforts to preserve the irreplaceable heritage of Texas. If you have any questions concerning our review or if we can be of further assistance, please contact Linda Roark at 512/463-9122.

Yours truly,

Linda Roark, Preservation Specialist, Division of Architecture
for: F. Lawerence Oaks, State Historic Preservation Officer

cc: Steve Salin, Dallas Area Rapid Transit
    Jesse Balleza, Federal Transit Administration, Region 6
    Jim Anderson, Dallas CLG
    Jim Dunn, Dallas County Historical Commission

FLO/LR
March 25, 2002

Stephen L. Salin, AICP
Senior Manager
Corridor and Environmental Planning
Dallas Area Rapid Transit
P.O. Box 660163
Dallas, TX 75266-0163

Re: Project review under Section 106 of the National Historic Preservation Act of 1966,
DART Southeast Corridor, Dallas, Dallas County, Texas

Dear Mr. Salin:

While reviewing the “Draft Environmental Impact Statement” for the above referenced project, it has
come to our attention that, after evaluating the Good-Latimer Underpass, we neglected to provide any
comment regarding the eligibility of the remaining properties in the Area of Potential Effects (APE). This
letter, therefore, serves as comment on those properties from the State Historic Preservation Officer, the
Executive Director of the Texas Historical Commission (THC).

The THC review staff, led by Peter Ketter, has reviewed the “Request for Determination of Eligibility”
dated August 2001, and the “Supplemental Requests for Determination of Eligibility” dated November
2001 and December 2001, and would like to provide the following comments.

We acknowledge that the following properties in the APE are LISTED in the National Register:

- 3301-3333 Elm St., 212 and 232 Trunk Ave., Continental Gin Company (NR 1993)
- Fair Park (NHL 1986)

We CONCUR that the following properties are ELIGIBLE for listing in the National Register as
contributing elements of a Commerce Street Warehouse District:

- 4100 Commerce, Alexander Motor Company Building
- 4118 Commerce, W. Gottlich Company Manufacturing Building
- 4044 Commerce, Lincoln Paint & Color Company Building
- 3801 Parry, Old Tige
- 3809 Parry, Howard Wolfe Building and Garage
- 4140 Commerce, Texlite Building

We CONCUR that the following properties are ELIGIBLE for listing in the National Register as
contributing elements of a Deep Ellum Historic District:

- 2605 Elm, Fink Paint Co. Building
- 2625 Elm, Manufacturers Expo Bldg.
- 2615 Elm, American Transfer & Storage
- 2609 Elm, Southern Refrigeration Co. Bldg.
We CONCUR that the following properties are individually ELIGIBLE for listing in the National Register:

- 3601 Main, National Biscuit Company
- 624 N. Good-Latimer, St. James AME Temple
- 2551 Elm St., Knights of Pythias Temple

We DISAGREE with your assessment of the following two properties, identified as not eligible in Table 4 of the November 2001 Supplemental Request:

- Good-Latimer Underpass (see THC letter dated February 1, 2002) - ELIGIBLE
- 3333 Elm – LISTED as part of the Continental Gin Company (NR 1993) – see above

We CONCUR that the remaining 92 properties listed in Table 4 of the November 2001 Supplemental Request are NOT ELIGIBLE for listing in the National Register. No further review is required regarding those properties.

We look forward to further consultation with your office and hope to maintain a partnership that will foster effective historic preservation. Thank you for your cooperation in this federal review process, and for your efforts to preserve the irreplaceable heritage of Texas. If you have any questions concerning our review, please contact Peter Ketter at (512) 463-5942 or Linda Roark at (512) 463-9122.

Sincerely,

[Signature]

Peter Ketter, Historian
for F. Lawrence Oaks, SHPO

cc: Linda Roark, THC Division of Architecture
May 6, 2002

Mr. John Hoppie
Dallas Area Rapid Transit
P.O. Box 660163
Dallas, Texas 75266-0163

Re: Project review under Section 106 of the National Historic Preservation Act of 1966
Good-Latimer Tunnel, DART Southeast Corridor, Dallas County (FTA/106)

Dear Mr. Hoppie:

The Texas Historical Commission requested, but has not received, additional information from DART on proposed options A and B for the Good Latimer Tunnel, Deep Ellum Station and rail design, and the extent of anticipated effects on historic properties. We understand that option C is locally unpopular, would demolish historic properties and is not being pursued. At this time, we believe that it is necessary to comment as best we can with the information obtained on the options proposed. This letter serves as comment on this area of the proposed undertaking from the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission.

From the information in the draft Environmental Impact Statement (figures 2.16 and 2.17), Option A appears to take more of the property historically associated with the National Register-eligible Knights of Pythias Temple than Option B, since in Option A the relocated N. Good-Latimer Expressway would take part of the property historically associated with the Temple. Option B would also preserve the National Register-eligible Good-Latimer Tunnel. It appears, from the information we have been given and were able to gather, that Option B is feasible and prudent for the rail and station design in this area.

We understand that the Deep Ellum community was originally concerned about the loss of the Good-Latimer Tunnel proposed in Option A, since the tunnel serves as a gateway to the community, and that DART has offered the community $1.5 million dollars to create a new gateway in conjunction with Option A. We suggest that with Option B of this project the historic Good-Latimer Tunnel can be preserved for its historic value, continue to serve the transportation needs of the community, and be enhanced by artwork and lighting to improve perceived negative aspects of its design. The project design should be developed to avoid potential adverse effects on the National Register-eligible Knights of Pythias Temple; the rail line should be kept as far from the property as possible and as close to grade as possible.
GOOD-LATIMER TUNNEL
MAY 6, 2002
PAGE 2 OF 2

We recommend that a Memorandum of Agreement be developed to address the overall effects of the Southeast Corridor project and look forward to further consultation with your office regarding this and other aspects of the project design. We hope to maintain a partnership that will foster effective historic preservation. If you have any questions concerning our review please contact me at 512/463-6100, or Division of Architecture staff Linda Roark at 512/463-9122.

Yours truly,

F. Lawerence Oaks, State Historic Preservation Officer

CC: Steve Salin, Dallas Area Rapid Transit
    Jesse Balleza, Federal Transit Administration, Region 6
    Jim Anderson, Dallas CLG
    Jeff Dunn, Dallas County Historical Commission

FLO/LR
July 8, 2002

Mr. Stephen Salin
Dallas Area Rapid Transit
P.O. Box 660163
Dallas, Texas 75266-0163

Re: Project review under Section 106 of the National Historic Preservation Act of 1966
DART Southeast Corridor Determination of Effects Report, Dallas, Dallas County
(FTA/106)

Dear Mr. Salin:

Thank you for providing our office with additional documentation regarding the subject project. This letter serves as comment on the proposed undertaking from the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission.

The review staff, led by Linda Roark, has completed its review of the DART Southeast Corridor Determination of Effects Report, dated May 2002, and has the following comments and recommendations:

- 4140 Commerce Street, the B. F. Goodrich Building (referred to as the Texlite Building in the Effects Report) and 3809 Parry, the Goodyear Tire and Rubber Company Building (Howard Wolfe Building and Garage) were listed in the National Register of Historic Places on March 1, 2002.

- We concur that streets in the area of eligible and listed historic properties are located in a dense urban area, and that in some cases there is historic precedent for trolley transportation on streets in the area of identified historic properties. We also concur that DART construction (stations ancillary buildings, catenary poles, wires, and sound insulation construction) will introduce new visual elements in the street right-of-way. We recommend that an appropriate design review process be included in the agreement document to be developed, to ensure compatible design of new visual elements with historic properties in the project area of potential effect and avoid the potential for adversely affecting historic properties. If this is done, then we concur with your anticipation that the properties listed in Table 2, report page 9, will not be adversely effected by this undertaking.

- We concur that taking land from Fair Park, a National Historic Landmark, and DART construction adjacent to the Park have the potential to adversely affect this historic property, and that an agreement document should be developed to address taking, design, construction and other issues for the overall project.
We concur that demolition of the Good-Latimer Tunnel would have an adverse effect on the historic property, and that development of appropriate mitigation documentation should be stipulated in the agreement document.

We concur with your plan to conclude the determination of eligibility for the Comanche National Storytelling Place before assessing potential project effects.

We look forward to reviewing a draft agreement document and the revised EIS. Thank you for your cooperation in this federal review process, and for your efforts to preserve the irreplaceable heritage of Texas. **If you have questions concerning these comments please contact Linda Roark at 512/463-9122.**

Yours truly,

F. Lawrence Oaks, State Historic Preservation Officer

cc: Jesse Balleza, Federal Transit Administration  
Jeff Dunn, Dallas County Historical Commission  
Jim Anderson, Dallas CLG  
FLO/LR
October 24, 2002

Mr. Mark Denton  
Archeology Division  
Texas Historical Commission  
P.O. Box 12276  
Austin, TX 78711-2276

Dear Mr. Denton:

Please find enclosed one copy of the draft report entitled *Cultural Resources Survey of a Portion of the DART Southeast Light Rail Corridor, Dallas Area Rapid Transit Light Rail System, Dallas County, Texas* for your review. Geo-Marine, Inc., under Antiquities Permit 2936 conducted this archeological investigation for Carter & Burgess, Inc., and Dallas Area Rapid Transit as part of the Environmental Impact Statement process.

I look forward to hearing from you.

Sincerely,

John Hoppie  
Project Manager  
Southeast Corridor

Enclosure

C: w/o John Sweck, FTA  
Steve Salin
November 12, 2002

Mr. F. Lawerence Oaks  
State Historic Preservation Officer  
Texas Historical Commission  
P.O. Box 12276  
Austin, TX 78711-2276

Attn: Mark Denton

Re: Determination of Effect  
DART Southeast Light Rail Corridor,  
Devon-Anderson Park, Culturally  
Significant “Storytelling Place”

Dear Mr. Oaks:

When the cultural significance of the “Storytelling Place” located in Devon-Anderson Park adjacent to the railroad corridor proposed for the Dallas Area Rapid Transit (DART) Southeast Light Rail Project came to light during public meetings on the Environmental Impact Statement, DART undertook extensive investigations to determine the extent of the site and its potential for designation as historically significant. Specifically, DART and this office began consultation with Mr. Jimmy Arterberry of the Comanche Nation, who was identified as the Tribal Historic Preservation Officer, and arranged a field review of the site with Mr. Arterberry, Comanche nation Chairman Johnny Wauqua and your staff. The review was conducted on August 12, 2002. Local residents also participated at the site. Written documentation included briefing papers by Mr. Arterberry and Ms. Linda Pelon, a local historian recognized by the Comanche as an expert on their culture and history in this area. Additionally, Chairman Wauqua of the Comanche Nation has issued a Proclamation, dated May 23, 2002, designating the Storytelling Place a sacred site and inheritance of the Comanche cultural legacy.

As suggested during the tour of the area, DART directed Geo-Marine, Inc. to conduct cultural resources investigations along the segment of the Southeast Corridor through Devon-Anderson Park and the crossing of several tributaries of White Rock Creek, a distance of about 3.5 miles. The survey, documented in Cultural Resources Survey of a Portion of the DART Southeast Light Rail Corridor, Dallas Area Rapid Transit Light Rail System, Dallas County, Texas, dated September, 2002 found no historically nor culturally significant evidence within the railroad right of way.
With respect to the Culturally significant Comanche Storytelling Place sacred site the report concludes that the proposed construction within the railroad right of way will have no effect on historic properties along the subject portion of the project. It also states that construction changes already agreed to by DART will minimize impacts to the site.

With our support, DART and the Comanche are in consultation on a continuing basis and have agreed on measures to minimize construction impacts and enhance safety at the Storytelling Site. In an August 16, 2002 letter to this office Mr. Arterberry acknowledges agreement with DART relative to the proposed construction and protections to the site.

Therefore, we propose to proceed with a Finding of No Adverse Effect subject to the continued cooperation between DART and the Comanche Nation and DART’s commitment to the proposed construction mitigations. Should you have any questions or comments, please contact myself or John Sweek, Community Planner at 817-978-0550.

Sincerely,

[Signature]

Robert C. Patrick  
Regional Administrator

cc: Mr. Jimmy Arterberry, THPO, Comanche Nation  
    Mr. John Hoppie, DART
December 2, 2002

John Hoppie  
Dallas Area Rapid Transit  
P. O. Box 660163  
Dallas, TX 75266-0163

Re: Project review under the Antiquities Code of Texas Antiquities Permit #2936, DART Southeast Light Rail Corridor Archeological Survey, Draft Report (DART)

Dear Mr. Hoppie:

Thank you for your correspondence describing the above referenced project. This letter presents the comments of the Executive Director of the Texas Historical Commission, the state agency responsible for administering the Antiquities Code of Texas. We have reviewed GeoMarine's draft report for Antiquities Permit #2936, and with the exception of one minor change that is needed with the text, we concur with their conclusions and recommendations.

Because we concur with the overall conclusion of this archeological report that there will be "no effect on historic properties," we must ask that you ensure that the second to the last sentence of the "Recommendations" section of the report (on Page 55) is amended. We believe that the use of the term "impact" and this entire sentence creates confusion as to whether there will be an affect to the reported "storytelling place." This change however, is the only alteration that we feel is needed and we will await 20 copies of the final report with the above referenced correction.

We look forward to further consultation with your office and hope to maintain a partnership that will foster effective historic preservation. Thank you for your cooperation in this state review process, and for your efforts to preserve the irreplaceable heritage of Texas. If you have any questions, please contact Mark H. Denton of our staff, at (512) 463-5711.

Sincerely,

Mark H. Denton
for
F. Lawrence Oaks  
Executive Director

LO/mhd

cc: Duane E. Peter (GeoMarine, Inc.)
December 6, 2002

Robert C. Patrick
Regional Administrator
US Department of Transportation
Federal Transit Administration
819 Taylor Street, Suite 8A36
Fort Worth, TX 76102

Re: Project review under Section 106 of the National Historic Preservation Act of 1966, Cultural Resource Survey of Portions of the DART Southeast Light Rail Corridor (FTA)

Dear Mr. Patrick:

Thank you for your correspondence concerning the above referenced project. This letter presents the comments of the Executive Director of the Texas Historical Commission and State Historic Preservation Officer. We have reviewed your letter dated November 12, 2002, and we have also recently reviewed GeoMarine’s report that was forwarded to us by Mr. Hoppie of the Dallas Area Rapid Transit (DART). Based on this information, we believe that no historic properties will be affected within the 3.5 mile “Devon-Anderson Park” corridor segment of the DART right-of-way.

In that regard, we suggest a minor technical amendment related to 36CFR800. The correct determination for this project is that there will be “no historic properties affected” rather than a “finding of no adverse effect.”

Thank you for your cooperation in this federal review process, and for your efforts to preserve the irreplaceable heritage of Texas. We look forward to further consultation with your office and hope to maintain a partnership that will foster effective historic preservation. If you have any questions please contact Mark H. Denton of our staff, at (512) 463-5711.

Sincerely,

[Signature]

for
F. Lawerence Oaks
Executive Director

LO/mhd

c: John Hoppie (DART)
January 21, 2003

John Hoppie  
System Planning Manager  
Dallas Area Rapid Transit  
P.O. Box 660163  
Dallas, TX 75266-7245

RE: Comments on 4(f) Statement for DART Southeast Corridor Project

Dear Mr. Hoppie:

Thank you for the extensive review of alternatives for the Southeast Corridor project. Preservation Dallas submitted its issues and concerns in prior correspondence, and suggested levels of mitigation in a letter dated August 15, 2002. We appreciate your attention to the issues outlined in the correspondence.

Preservation Dallas offers two additional comments:

(1) We encourage you to work with the City of Dallas Landmark Commission in its review of design alternatives for the Fair Park Station. The Certificate of Appropriateness process should be followed and the recommendations of the Fair Park Task Force and Commission should be considered in your future design endeavors. This consultation should occur before final design decisions are made.

(2) During the research and documentation for mitigation (i.e. HAER), a thorough historical analysis of the Good-Latimer Tunnels should be prepared. The historical context presented in the 4(f) document is very general and broad, and thus does not give adequate coverage of the development patterns of the city.

We appreciate your response to the community’s concerns and look forward to working with you on the mitigation of the Good-Latimer Tunnels and new station at that location. If you have questions, please contact us.

Sincerely,

W. Dwayne Jones  
Executive Director
January 22, 2003

F. Lawerence Oaks, Executive Director
State Historic Preservation Officer
Texas Historical Commission
Post Office Box 12276
Austin, Texas 78711-2276

Dear Mr. Oaks:

On Tuesday, January 14, 2003, the City of Dallas Landmark Commission reviewed two proposals by Dallas Area Rapid Transit (DART). These are 1) the proposed location of a station at the primary/Parry Avenue entrance to Fair Park, and 2) mitigation efforts relating to the filling-in of the Good Latimer tunnel for a station north of Elm Street in Deep Ellum.

The Landmark Commission, by unanimous vote, offers the following comments to you regarding item #1, the proposed Parry Avenue DART station at Fair Park:

Upon our review of information submitted on January 14, 2003, the City of Dallas Landmark Commission accepts the proposed DART alignment, the proposed station location at the ceremonial entry gate to Fair Park, and the schematic designs as submitted on their site plan drawing dated December 11, 2002.

This comment is made with the following finding of fact: That the proposed station utilizes the historic location of the 1936 ticket booth, and while visually intrusive to the "current" entrance, it is appropriate. Also, the proposed DART rail alignment re-establishes the original trolley lines that existed at the time of Fair Park's prime period of significance.

The Landmark Commission, also by unanimous vote, offers the following comments to you regarding item #2, the proposed mitigation efforts relating to the Good Latimer tunnel station location:

The mitigation of the Deep Ellum/Good Latimer tunnel should include an extremely strong historic context covering all remaining elements of the Ulrickson Plan that will support the development of a National Register of Historic Places nomination by the local community. A public interpretive element should be included either through interactive or static AMA quality museum display. The Landmark Commission also suggests that DART
explore other visual/architectural means of documentation in addition to HABS/HAER such as laser grammetry.

The City of Dallas Landmark Commission appreciates the opportunity to comment on these important proposals, and also appreciates your attention to these issues.

Sincerely,

Allison Poggi, Chair
Landmark Commission

c: Landmark Commissioners
    John Hoppie, Dallas Area Rapid Transit

P:\Historic\FAIR PARK\CORRESPONDENCE\LTR TO SHPO 011503
February 10, 2003

John Hoppi
DART
1401 Pacific Avenue
Dallas TX 75201

RE: Review of your Certificate of Appropriateness Application
Fair Park DART stop

Dear John:

Enclosed is a copy of the Certificate of Appropriateness (CA) application that you submitted for review by the Landmark Commission on 2/3/2003.

Your request for conceptual review of the Fair Park DART stop was approved in concept with the following conditions:

Conceptual approval of the stations with wave form seating and stainless steel roof, with a request of added consideration given to relocating markers, use of Fair Park standard colors and graphics, alternate durable materials lighting all color to match Fair Park standards, not constructing handicap platforms, exploring increased pedestrian flow across Parry Ave. station stop, no planters. Construct documents to be submitted for final review. Based on Secretary of Interior Standards #3, & #9 with the finding of written approval of Park Board and the Texas SHPO.

Please resubmit for a final Certificate of Appropriateness that addresses these conditions

Should you have any questions regarding this application, please contact us at (214) 670-4538. Thank you for your cooperation.

Jim Anderson
Department of Development Services
Historic Preservation Section

Enclosure
Certificate of Appropriateness (CA)
City of Dallas Landmark Commission

Name of Applicant: John Hopple, Dallas Area Rapid Transit
Mailing Address: 1401 Pacific Avenue
Daytime Phone: 214.749.2525 Fax: 214.749.3670
Relationship of Applicant to Owner: Owner

Property Address: 1300 R.B. Cullum Blvd (Fair Park)
Historic District: Fair Park Historic District

Proposed Work
Please describe your proposed work simply and accurately. Attach extra sheets and supplemental material as requested in the submittal criteria checklist.

See Attached


Signature of Applicant: __________ Date: 1/27/03

Application Deadline:
Application material must be completed and submitted by the first Thursday of each month, 5:00 p.m., before the Dallas Landmark Commission can consider the approval of any change affecting the exterior of any building. This form along with any supporting documentation must be filed with a Preservation Planner at City Hall, 1500 Marilla SCN, Dallas, Texas, 75201. You may also fax this form to 214/670-0728. Please do not fax paint colors or color photographs.

Please use the enclosed criteria checklist as a guide to completing the application. Incomplete applications cannot be reviewed and will be returned to you for more information. You are encouraged to contact a Preservation Planner at 214/670-4538 to make sure your application is complete.

Other:
In the event of a denial, you have the right to an appeal within 30 days after the Landmark Commission's decision. You are encouraged to attend the Landmark Commission hearing the first Monday of each month at 2:00 pm in Council Chambers of City Hall. Information regarding the history of past certificates of appropriateness for individual addresses is available for review in SCN of City Hall.

Please review the enclosed Review and Action Form
Memorandum to the Building Official, a Certificate of Appropriateness has been:

Approved. Please release the building permit. 1/14 CONCEAL O H Y

Approved with Conditions. Please release the building permit in accordance with any conditions.

Denied. Please do not release the building permit or allow work.

Sherrill J. Cockrell, Director
Department of Planning and Development

Certificate of Appropriateness City of Dallas Historic Preservation
Rev. 3/27/01, 2-11-02
Proposed Work

Station Location

Development of the Fair Park station at the west entrance of Fair Park re-institutes transit rail service that was provided to Fair Park decades ago by interurban and trolley lines. Based on community input, the Southeast Corridor rail alignment was modified to serve the ceremonial entrance to Fair Park on the east side of Parry Avenue. The center of the station platform is placed at the intersection of Exposition and Parry symmetrical to the park entrance. A pedestrian plaza will be developed encompassing the station and fronting Parry Ave to reinforce the Exposition Avenue gate.

A traditional neighborhood commercial district is found on Exposition north of Parry across from the Fair Park entrance and several vacant tracts used for event parking offer potential for redevelopment. Numerous residential loft properties have developed in recent years that are within walking distance of the station.

Station Design

The Fair Park station will consist of a typical side platform layout to be integrated into a new entrance plaza for the park. The station boarding area and tracks will be placed in the approximate location of the existing access drive falling partially within the park and partially within the Parry Street right-of-way. The trackway and boarding area/plaza will be constructed of enhanced concrete paving consistent with the preservation standards of the historic district.

The design of the station canopies has been developed from the historic context of the Fair Park gate during the Centennial Exposition in 1936. The park entrance at that time included ticket buildings located on the pedestrian entrance plaza adjacent to the trolley lines serving the park. The proposed new canopies are to be representative of the form of the original ticket buildings however, replicated in an ethereal and contemporary form of the original design. The canopy structures will replicate the cantilevered roof form of the original ticket buildings and will be supported by fluted limestone columns. The columns are a departure from the original enclosed buildings but serve to replicate the footprint of the original enclosure. The roof structure which was apparently plywood
originally, will consist of a composite glass and stainless steel skin to produce a semi transparent appearance suggesting an ethereal form of the original. Other elements of the station design include glass windscreens, raised planters, limestone seating, ticket vending machines and pay phones.

Lighting has always played a large part at the entrance to Fair Park and will be included within the spirit of the new structures. Lighting for the station area will be accommodated with contemporary light standards, an internally illuminated roof structure and supplemented by up-lighting of the architectural elements.
CERTIFICATE OF APPROPRIATENESS - REVIEW AND ACTION FORM
DALLAS LANDMARK COMMISSION

CA Address: Fair Park Dart Line
District: Fair Park
Type: Standard
SubType: Discussion

Nature of Work:
Conceptual briefing on the DART line that will serve Fair Park

A. Staff Recommendation:
Conceptual approval; with further consideration of:
1. Possibly removing or reducing size of internal columns (non-corner columns).
2. Move markers out of the path of pedestrians. Explore proper location of other added site features.
3. Colors per Fair Park standards.
4. Graphics per Fair Park Standards.
5. Historic compatibility of free-standing structures.
6. Remove handicap structures if possible or design temporary handicap structures
7. Roof structures preference for stainless steel over painted.

[Signature] 1/31/2003
Preservation Planner

B. Task Force Recommendation:
Conceptual approval; with further consideration of:
1. Transparency of structures.
2. Interaction of other elements such as fare machines, trash receptacles, telephones etc.
3. Colors per Fair Park standards.
4. Graphics per Fair Park Standards.
5. Historic compatibility of free-standing structures.
6. Temporary handicap structures.
7. Roof structures preference for stainless steel over painted.

[Craig Harvey] 1/29/2003
Task Force Chair

C. Landmark Commission Action:
Conceptual approval of the stations with wave form seating and stainless steel roof, with a request of added consideration given to relocating markers, use of Fair Park standard colors and graphics, alternate durable materials lighting all color to match Fair Park standards, not constructing handicap platforms, exploring increased pedestrian flow across Parry Ave, station stop, no planters. Construct documents to be submitted for final review. Based on Secretary of Interior Standards #3, & #9 with the finding of written approval of Park Board and the Texas
Landmark Commission Chair

3/6/2001

Date:

rev. 4/02
March 7, 2003

Mr. John Hoppe
Dallas Area Rapid Transit
1701 Pacific
Dallas, Texas 75201

Dear Mr. Hoppe,

I want to thank you and all the team working on the South Dallas/Fair Park light rail alignment and stations. The time and energy you have all committed to this project certainly shows in the briefing you presented to the Friends of Fair Park Board of Directors on February 19.

The seating areas respect the history and style of the park while providing a practical solution to the need for comfort when waiting for the train. It seemed to us that the choice of materials and lighting successfully bridged the gap between aesthetics and ease of maintenance.

I am pleased to report that we unanimously passed a resolution supporting the plans and looking forward to our continuing working relationship as the remaining decisions regarding the details of the concept are finalized. We definitely think the art deco typeface for the station is more compatible with Fair Park than the other choices.

Friends of Fair Park is anxiously awaiting the first light rail service to our area. We know that it will increase attendance at the park and, at the same time, decrease traffic congestion. Please let us know if we can be of further assistance.

Sincerely,

Steve Levine
President
Friends of Fair Park
Stephen L. Salin, AICP  
DART Interim AVP Capital Planning and Development  
Dallas Area Rapid Transit  
P.O. Box 660163  
Dallas, Texas 75266-0163

Dear Mr. Salin:

We appreciate the opportunity to review the interim information provided regarding the Section 4(f) Evaluations for the DART Northwest and Southeast Corridors Light Rail Transit Projects in Dallas County, Texas.

Following our reviews of the Draft Section 4(f) Evaluations provided to us over the last two years, we initially had concerns that the documents did not contain sufficient information to adequately determine the effects or "use" of recreation properties and cultural resources. Without this information, it was difficult to understand if the appropriate level of mitigation had been addressed or if some resources could have been avoided altogether. We were also initially concerned that the appropriate level of Section 106 compliance had not been conducted.

From the information provided to us for this review, including the comment responses to the Section 4(f) Evaluation and the Memorandum of Agreement with the Texas State Historic Preservation Officer and the Advisory Council on Historic Preservation, we recognize that a more thorough effort has been conducted on the part of the Federal Transit Administration and the Dallas Area Rapid Transit to more adequately analyze the effects to historic and recreation resources and consult with the Texas State Historic Preservation Officer. We appreciate and support this additional effort.
Thank you again for the opportunity to provide these comments, and we look forward to reviewing the Final EIS and Section 4(f) Evaluation for approval.

Sincerely,

Willie R. Taylor
Director, Office of Environmental Policy and Compliance

cc:
Mr. John Sweek
Federal Transit Administration
819 Taylor Street, Suite 8A36
Fort Worth, Texas 76102
ATTACHMENT E4
INFORMATION ON THE COMANCHE STORYTELLING PLACE
John Hoppie  
Project Manager  
Southeast Corridor  
Dallas Area Rapid Transit  

April 18, 2002  

Dear Mr. Hoppie:  

The Comanche Nation is in receipt of your request, for information relating to the sites of impact within the project area.  

Located in Devon-Anderson Park, is a natural spring and on the escarpment ridge near the spring is a place described by the Comanche people as a storytelling site. This area was used as a means of cultural transitions for children and young adults, historically. It was a gathering place where stories were shared and games were played. This area is very significant to the history of the Comanche people as well as the city, state and country.  

I have been to this area and located a number of significant resources available historically as well as futuristically, (i.e.: timber, water, medicinal plants, minerals, nuts, berries, fish and game).  

Also, within this segment of the “Great Trinity Forrest”, is a view looking to Cedar Hill, significant in the communications from one band of Comanches to another. Gateway Park is very near and within this segment as well, containing the Indian Marker Tree (Comanche Turning Tree) whose seedlings have been recognized as a contribution to the National Arbor Society.  

Ms. Linda Pelon has been actively involved in research relating to the Comanche people and has been recognized as an Ambassador, by former Chairman Coffey, and can be contacted at (214) 381-9324 for additional information relating to this area. Please feel free to contact me at (580) 492-3754 for further assistance in this matter if necessary.  

Sincerely,  

Jimmy Arterberry  
THPO/NAGPRA/OEP Director
Office of the Chairman

PROCLAMATION

Special Recognition of a “Comanche Storytelling Place” in Dallas County, Texas

WHEREAS, The Comanche Nation has existed since time immemorial, long predates the existence of the Nation, establishes the inherent sovereign powers and rights of Comanche self-governance: and

WHEREAS, The Comanche Nation is dedicated to progress and enhancement of the people of the Comanche Nation: and

WHEREAS, Dallas County, Texas, contains a “Comanche Storytelling Place”, considered a legacy and inheritance of generations to come: and

WHEREAS, It is the responsibility of the Comanche people to protect this inheritance, like those before, as evidenced in the oral traditions relating to this sacred site; and

WHEREAS, This “Comanche Storytelling Place”, has long been considered part of the Traditional Ancestral homelands of the Comanche people since creation, as related by Comanche elders: and

THEREFORE, I Johnny Wauqua, Chairman of the Comanche Nation, do hereby Proclaim this Comanche Storytelling Place a sacred site and inheritance of the Comanche cultural legacy.

Given Under my hand and
The Great Seal of the Comanche Nation
On this 23rd day of May, 2002

Johnny Wauqua
Chairman

Comanche Indian Tribe P.O. Box 908 / Lawton, OK 73502
Briefing on A Comanche Storytelling Place
By Jimmy Arterberry
August 6, 2002

“A long time ago, it is said” (so-bvay-tsu), begins all Comanche stories.¹
In the oral tradition of creation, migration and shared relationships, Comanche people identify the importance of time, place and social purpose. Life for a child starts exactly as the ancestors did, by oral instruction and visual aid. Comanche culture relies on the ability to identify the elements of a social structure and the understanding of those relationships. Storytelling places are conducive to the psychological and physiological training of Comanche children, and considered primary to the overall well being of man and nature.

Consensus of the Comanche people, to the location of storytelling places, enters into sacred dimensions, which are to be discussed only by the Comanche people. The Trinity Forest storytelling place is located within the bounds of the required elemental characteristics for determining the location of a preferred campsite. Water supply, food sources, shelter, safety and access to forage for horses are required characteristics, for such a site.²

The Great Trinity Forests’ White Rock Heritage District has been established as a “Comanche Storytelling Place”, by proclamation of the Comanche people.³ Ethno historical research, archeological documentation, cartographic documentation and consultation between the Comanche Nation and the U.S. Department of the Army, Corps of Engineers, emphatically demonstrates the necessary components for the selected audience, are found at this preferred location.⁴

Shared elemental components are expressed through idioms used in all stories of the Comanche people, emphasizing the importance of relationships between man and nature. The limestone component found at the Great Trinity Forest Storytelling Place, located on the ridgeline in Devon Anderson Park, within the White Rock Heritage District, determines the type and amount of information that is to be presented, and at what time of the day and year that information could and would be

¹ Comanche Texts, Elliot Canonge, University of Oklahoma 1958
² The Comanches, Lords of the South Plains, Wallace & Hoebe, University of Oklahoma Press, 1952, pg. 14
³ Comanche Nation Proclamation, 2002
⁴ Native American Territorial Ranges in the Central Region of Texas, A Report Prepared to Support NAGPRA Consultation, May 2001, Published by the U.S. Army Corps of Engineers, Ft. Worth District
made available. There are many traditional ways, in making the determination as to where and when these lessons should and could occur. Relationships between all of the elemental components, the receiving component included, would be defined and refined through the use of storytelling at the chosen location.

The presence of Comanche people in the state of Texas and particularly in the Dallas area, in relation to this writing, has been illusive to the scientific communities in recent times, although descendants of the former inhabitants recognized by the aforementioned in their previous processes, continue to exercise inherent values described in relation to the geography.

Comanche people inherently conceive the importance of honoring the traditional values of the ancestors. Without defined relationships and traditional values, nature will not survive man, man will not survive nature and the results shall be exact, furthering the significance of identifying and protecting such a site, as the Dallas County, Texas, Comanche Storytelling Place, with all of its vital components.
The Great Trinity Forest’s White Rock Heritage District
Prepared by Linda Pelon (August 2002)

Introduction

Places extraordinarily rich in natural resources are also often rich in cultural resources. As peoples live and die, and as cultures rise and fall, they are replaced by others who are also attracted to the wealth of resources that enhance the quality of human life. Evidence of these various occupations is stored in the land itself. If recognized and protected, these archeological sites—and the natural features associated with them—can become a priceless archive of information documenting a wide range of human lifestyles and adaptation strategies.

Such places are sometimes recognized and preserved as national or state parks, or survive because they are remote from population centers and the pressures of development. It is rare, perhaps miraculous, for such a place in survive into the 21st Century within the shadows of the skyline of one of our largest cities. A relatively undisturbed section of Dallas’ Trinity River Valley near the confluence of White Rock Creek and the Trinity River is one of these rare and special places where evidence of over 10,000 years of human presence is preserved. Cultural resources present here range from sites of early Native Peoples, through historic Indian tribes, to the land grants of Dallas’ first pioneers. Sites associated with Freedmen’s farming communities and some of Dallas’ earliest African American urban neighborhoods were also located here.

This area has been recognized as a featured destination in Dallas’ newly created White Rock Heritage District. It has also been selected for the Sierra Club’s “Special Places of Texas” program and will be featured in a public relations campaign beginning in September of 2002. The value of this area for educational programs, ecotourism, and historic and heritage tourism should not be underestimated. It is a treasure to preserve and share in a respectful and sustainable manner.

In the Spring of 2002 a Draft EIS report for DART’s Southeast Dallas Light Rail Line was published. Those proactively involved with inventorying cultural resources within the White Rock Heritage District became aware that the most significant natural and cultural resources identified within the Gateway and Devon-Anderson parkland were in harm’s way from dramatically damaging—and understated—impacts from this transportation project.

This is the first of a series of papers documenting and discussing the cultural occupations of the White Rock Heritage District segment of Dallas’ Great Trinity Forest. This information is intended for use in establishing eligibility as a National Register Historic Landmark District with Traditional Cultural Properties. These papers will also be used to alert others to the importance of the endangered cultural and natural resources within City of Dallas parkland along this proposed alignment of the Southeast DART light rail line.

This paper will focus on resources recognized by the Comanche Nation as significant to their Texas cultural heritage. First, background information will be

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1 The northern boundary is Scyene Road. To the east and west it includes the bottomland hardwood forests and other natural areas adjacent to the creek and floodplain, past the confluence of White Rock Creek with the Trinity River and south beyond Loop 12 to (and including) the Joppa Preserve.
provided documenting the contemporary relationship between the Comanche Nation and the surviving historic landscape of this part of the Great Trinity Forest. This will be followed by documentation supporting Comanche use of this area prior to 1840. Supporting evidence will be provided and organized by the following categories: cartographic, ethnohistorical, and geographical. Archeological information documented in the DEIS indicates that there are cultural resources in association with features discussed as part of the Comanche landscape in this Lower White Rock Creek corridor parkland. The DEIS also reports that this area has not been adequately studied.

The Comanche Nation’s Contemporary Relationship with the Great Trinity Forest and Lower White Rock Creek

It is ironic and appropriate that the natural feature that refocused attention on this area was a “Marker Tree” or “Turning Tree” since one of the primary purposes of these trees was to mark a preferred Comanche location. While conducting thesis research on the Penatuhkah Comanches, a powerful Texas band at the zenith of Comanche power in the Nineteenth Century, I began to hear about Comanche Marker Trees/Turning Trees from Comanche elders and other Comanche informants. In 1995, after seeing a photograph of one of these trees featured in Famous Trees of Texas (Texas Forest Service 1984:177), I realized that a pecan tree fitting this description survived in Gateway Park. Because so little work has been published on the Comanche presence on the Trinity River, and because my research was focused on a West Central Texas band, I was surprised to find a tree of this description so far to the east.

Arborists and Dallas’ regional forester were consulted to determine an approximate age of the tree and the consensus was that it was over 150 years old. The area in the vicinity of the tree was explored from a Comanche perspective and was found to contain a treasure trove of resources important to the lifestyle of these nomadic people. In fact, the site fits a template for a preferred Comanche campsite. Archeological surveys previously conducted by the Dallas Archeological Society (DAS) documented extensive use of this area for camping by Native People. One DAS officer commented that the area was “so saturated with sites as to be considered one big campsite.”

While it was surprising to many historians to find a tree fitting the description of a Comanche Marker Tree so far east as the Trinity River, knowledgeable Comanche individuals were not surprised. They had not forgotten about the importance of “Pih-heet Pah-e-hoona” (the Comanche name for the Trinity River; it translates as “Three Rivers”). Arborists agreed that the tree was old enough to have been used as a marker tree and research was completed to nominate the tree to the Dallas Historic Tree Registry. This information was also submitted to the Comanche Tribal Council. A proclamation was signed (April 7, 1997 by Chairman Wallace Coffey) recognizing the Gateway Park Marker Tree as “a living monument to our historic presence in the great state of Texas” and noting “the importance of this tree to Native American cultural heritage.”

Comanche poet and educator Juanita Pahdoony was sent as an ambassador from the Comanche Nation to read this proclamation at the dedication ceremony for the tree on

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2 A section of this tree was taken for study after it blew over in 1998. Tree rings indicate the tree was at least 290 years old, per the consensus of arborists consulted. Bill Seaman, President of the Dallas Historic Tree Coalition, can provide additional details.
April 26, 1997. She was quoted in a report in the Dallas Morning News (April 27, 1997): “This represents a continuation of our culture. We are one with nature. This tree has a lot of stories to tell. It is too bad that we have not been here to hear them.” Within a few months of the dedication event, Chairman Coffey visited the site and completed traditional blessing ceremonies for the area from the scenic overlook on the escarpment ridge above the Keeton Golf Course [the proposed DART line runs immediately below this overlook].

Because the tree appeared damaged and unhealthy, Glenn Watson (Pipe Carrier for the Comanche War Scouts) visited the site often to pray for the tree in the traditional Comanche way until the tree was destroyed in a Memorial Day thunderstorm in 1998. The Marker Tree was often discussed on Beyond Bows and Arrows (the community radio program serving Dallas’ Indian community) resulting in many additional visits to the tree. Local Indian families brought their children to see it, and many included the tree in their prayers. Jimmy Arterberry, Tribal Historic Preservation Officer (THPO) and EPA Director for the Comanche Nation, visited the area in July of 2001 and identified additional natural features important to Comanche cultural heritage. These features included a “Storytelling Place” and a mature Red Cedar Woods that may have been a source for lodge poles. The Comanche Language and Culture Preservation Committee visited in June of 2002. They have expressed interest in returning this autumn to assist with dedication ceremonies for historic trees marking these places recognized as significant to their Texas heritage.

After almost 150 years of exile and disconnection from their Texas homelands, sacred places, and heritage sites the Comanche Nation has finally reconnected with the “Pih-heet Pah-e-hoona.” The preservation of these natural features and heritage sites, and the tranquil natural setting in which they exist, is of great concern to them and to many Texans who also value the diversity of heritages and histories of Texas.

**Evaluation of a Historic Comanche Presence**

**On Lower White Rock Creek**

"I am like the bird flying through the air. I am traveling and am always traveling..."

Buffalo Hump, Texas Comanche Chief

1844 Treaty Negotiation with Sam Houston

“History” it is said, “is written by the conquerors.” And that is but one side of any human story. Ethnohistorical research methods go beyond the use of the written record and incorporate additional sources of information to create multi-faceted reconstructions of encounters between cultures. These techniques are also successfully used to reconstruct the histories of cultures without written languages. Oral historical and cartographic information, archeological evidence, and innovative techniques emerging from the discipline of historical geography (“reading the landscape”) are being successfully applied to gain more complex and accurate understandings of past events, interactions, life ways, and land uses. These techniques have been applied to this investigation regarding the occupation of the Upper Trinity River by Comanche people prior to the establishment of Dallas. This unfunded study is intended to assist with filling
the information void in the cultural resources report of the Dallas Area Rapid Transit's (DART) Draft Environmental Impact Statement (DEIS) for the alignment of a proposed DART light rail line through City of Dallas parkland containing Native American cultural resources. The City of Dallas' Devon Anderson Park, containing a natural feature recognized by the Comanche Nation as a "Storytelling Place" will be a focal point for this study. This feature/landmark would be at least partially destroyed under the proposed plan for constructing this DART transportation project receiving federal funds.

Information from sources close to the last surviving Texas chiefs and warriors has been included. Cartographic information from Nineteenth Century maps of Texas was used to document a Comanche presence in this area. Contemporary Comanche elders, leaders, tribal historians, and others with traditional knowledge were consulted. This information was combined information from the historic record and applied to "read the landscape" along Lower White Rock Creek near its confluence with the Trinity River in Southeast Dallas County.

A Comanche Perspective on Occupation

The first consideration is the definition of occupation. This is a concept that varies with cultures. For these "Lords of the South Plains," a Comanche concept of occupation included seasonal use of areas more permanently settled by other tribes. Relationships with other tribes were not unlike those in Europe under the feudal system. Agricultural tribes provided buffer zones in Comanche borderlands and were trading partners (Wallace and Hoebel 1986:14). The Three Forks area was documented as a peaceful trading area by European witnesses as early as 1680 (Mesquite Historical Society 1984:7-11). There are later references to Comanche participation in these annual Trade Fairs between the agricultural tribes and the prairie tribes. Ferris reported Comanche war parties patrolling the Indian trails in the Three Forks after surveying began in the late 1830s (Starling 1998:100). This makes a strong case for occupation from a Comanche perspective because Comanche warriors defended lands that they claimed. Treaty talks with Texas Indians at Bird's Fort in 1843 document the importance of consulting Comanche leaders prior to approval of a treaty. The presence of a tree fitting the description of a Comanche Marker Tree supports the argument for Comanche occupation of the Lower White Rock Creek section of Dallas' Trinity River Corridor. Two additional trees fitting the description of Comanche Marker Trees have been identified at strategic locations within what is now the City of Dallas providing additional evidence of use of this area as part of the Comancheeria.3

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3 A local trail historians report (personal conservation during site visit in 2002) that the tree at California Crossing appears to be aligned with the historic California Crossing Trail and points toward the historic low water crossing of the Trinity River. The other tree is on Cedar Ridge in a location strategic for surveillance and perhaps smoke signaling. Like Lower White Rock Creek, this is an area with archeological evidence of Indian occupation. It is also interesting to note that Cedar Ridge is visible from an overlook adjacent to the recognized Marker Tree on Lower White Rock Creek. Clearly, the potential for communication via smoke signaling existed between these two places with suspected Marker Trees.
Cartographic Evidence

Although Spanish and Mexican authorities claimed the Three Forks region on vague maps, neither really controlled it. North central Texas still belonged to the Indians. It was a meeting ground of numerous tribes who camped and traded along Turtle creek, at Cedar Springs, and along White Rock Creek. Two major Indian footpaths (or traces) crossed the Three Forks from the east to west.... Following these Indian routes, bands of Wichitas (called variously Keechies, Ionies, Tawakoni, and Towash), as well as Cherokees, moved through the Three Forks to camp along the tree shaded streams. The Indian traces were also a favored route for Comanche war parties that swept in off the Plains to raid isolated settlements and confront intruding surveyors bearing that hated instrument, the compass, "the thing that steals the land."

Susan Starling
Biographer of Warren Ferris
1998:100

Perhaps the map most immediately relevant to this study, in context of the recognition and protection of Comanche cultural resources near the Trinity River and for consideration for National Register eligibility, is the map published in A Report to Support NAGPRA Consultation by the U. S. Army Corps of Engineers (Patterson 2001:6). This map, The Comanche Tribe to the mid 1800s, includes the entire Trinity River watershed. This map is consistent with information provided by historic maps.

Although this paper is not intended to be an in-depth search of map collections, some cartographic sources were found supporting a Comanche presence in the upper Trinity River watershed. "World class" map collections at both UTA and SMU contain a wealth of cartographic information relevant to the Three Forks that should be included in evaluations of cultural resources. A superficial survey of cartographic information easily available through local libraries and directly relevant to an evaluation of Comanche use of the Three Forks is summarized below:

Map of the Great Kingdom of Tejas to Accompany the History of Comanche Land (Harston 1963:inside cover)⁴ This map was created by J. Emmor Harston, a source close to the last surviving Texas Comanche leaders and chiefs. It shows a boundary line for Comanche territory east of the Trinity River between the Neches and Sabine Rivers. Reporting information he gathered from Comanche elders in the last decades of the Nineteenth Century, Harston described "an easterly north-south trace traveled by both the Comanches and the Wichitas. From Antelope Springs, at the head of the Trinity River, a Wichita Trace led down that stream to the Neches River and on to the Gulf of Mexico. This trace was the boundary between the two tribes" (Harston 1963:201).

⁴ Harston informs the reader that "Tejas", [or "Te-ich-as"] is a Comanche word meaning "eater." He also reports that Comanche bands were named by what they eat—buffalo eaters, honey eaters, antelope eaters, etc.
Map of Texas Compiled from Surveys in the Land Office (by John Arrowsmith in 1841): This map (found in UTA’s map collection) documents a “Comanche Trail” running west from the Pecan River fork of the Colorado River north/northeastward to cross the Brazos River just north of a “High Peak” [now called Comanche Peak] and then east/southeast to cross Noland Creek and eastward to cross the Trinity River below the Three Forks just south of Cedar Creek and then east to an “Indian Village” on the Neches River. From there the trail splits and one branch heads east to “Cherokee Cross” south of Cypress Bayou. A more southern fork head south/southeast and ends at the “Road from Bexar to Nacogdoches” just west of Nacogdoches.

Map of Texas Compiled from Surveys and Records in the General Land Office of the Republic (by Hunt and Randal in 1845): This detailed map of Texas (found in UTA’s map collection) also includes an east/west “Comanche Trail” running from the headwaters of Pecan River (a fork of the Colorado River), crossing the upper Brazos River and then the Trinity River to the south of the Three Forks area in what is now northern Ellis County. From there in continues eastward to an “Indian Village” on the Neches River. This trail then splits into a trail headed east/northeast to the “Cherokee Crossing” of the Neches River. The more southern fork of the trail heads south/southeast and ends near Nacogdoches.

“As the bird flies,” the Three Forks area is just north of the crossing of a major Comanche Trail connecting a Comanche center of power to frontier centers of commerce (Nacogdoches, a bustling multicultural outpost of frontier commerce and a major route to San Antonio). The Wichita Trace, described by Harston as following the Trinity River, could have been used for quick and easy access the Three Forks area from this Comanche trail. It would be reasonable to assume that the Wichita Trace was an important north/south trail connecting Indian trading routes with frontier trading routes via the major east/west Comanche Trail leading to Nacogdoches and connecting with the Road to San Antonio.

Indian roads were also documented within the Three Forks area by Warren Ferris, creator of the first surveys of the Three Forks. These roads were described in contemporary terms by Dallas historian Homer DeGolyer and reported by Ferris’ biographer, Susan Starling. These two additional Indian Traces are (Starling 1998:100):

The Kickapoo Trace: “entered present Dallas County from the Southeast, near modern Seagoville, and proceed to a ford across the Trinity, at approximately the junction of Commerce Street and Industrial Boulevard in the present city of Dallas. From there the trace continued west, skirting the outcropping of Chalk Hill in Modern Oak Cliff,

5 This area, also called Pecan Bayou, was the central place for the powerful Penatuhkah Comanche Band in the middle of the Nineteenth Century. The importance of this area is well documented in a thesis by Linda Pelon in 1993, Issues in Penatuhkah Comanche Ethnohistory.
6 The Pecan Bayou area and Santa Anna Peaks, described as a “Comanche West Point and a training center for smoke signaling communications (Harston 1963:110-119). Santa Anna Peaks, and the adjacent town (Santa Anna, in Coleman County near Brownwood), are named for the great Comanche war chief Santa Anna or Santanna. The town of Santa Anna is working with the Comanche Nation to identify Comanche cultural resources in their area.
7 The DeGolyer Western History Library at SMU is named for him and his papers are archived there.
crossing Mountain Creek to the Indian campsites on Village Creek in present Tarrant County. This trace is described as “roughly following U.S. Hwy 175 (Starling 1998:105). It is interesting to note that Hwy 175 passes through the White Rock Creek area near what is now Devon Anderson Park. Also nearby is the spring at Pemberton Hill where trail historians Darwin Payne and Jim Dunkley believe Sam Houston camped before crossing White Rock Creek on his way to Bird’s Fort for treaty talks with Texas Indians. Houston was traveling with Indian guides who were using their trails and campgrounds.

The Caddo Trace: “crossed the northeast corner of what is now Dallas County, near present Sachse and Garland.”

Geographical Evidence
Reading the Landscape from a Comanche Perspective

Throughout the first two decades following the passage of the National Historic Preservation Act (1966), cultural resources were legally and intellectually defined as material culture—artifacts, features, archeological sites, crafts....However, the amendments to the 1966 act and to the American Indian Religious Freedom Act of 1978, among other pertinent legislation passed by congress and by the executive office since 1980, require consultation with American Indian groups who once inhabited lands now managed by the state and federal governments. Ensuing interactions among agencies, tribes, and anthropologists have greatly expanded the definition of cultural resources to incorporate a far broader set of natural and cultural materials, features and places. It is in this context that the landscape approach was introduced into the American Indian cultural preservation programs (National Park Service 1994) (104).

One of the first steps toward expanding the notion of cultural resources in field studies entailed the integration of ethnographic, archeological, and ethnohistorical research in the evaluations of traditional cultural properties or TCPs. TCP is a term introduced by the National Register Bulletin 38 (Parker and King c. 1990) to designate places of cultural and religious significance for American Indians that may or may not have associated material culture (e.g. a landform, a stand of old growth). It quickly became clear, however, that these properties could not be evaluated as discreet units but must be evaluated as part of a much larger whole...

Maria Nieves Zedeno
(Social Theory in Archeology
Schiffer 2000:104-5)

Evidence of a Comanche presence and occupation of the Three Forks area of the Trinity River has been presented. As seasonal participants in an annual trade fair that gathered many tribes, it would be reasonable to assume that these “Lords of the South Plains” would have had fist choice of camping areas and would have somehow claimed these sites. The presence of a tree fitting the description of a Comanche Marker Tree in what is now called Gateway Park, adjacent to a cluster of natural features that fit the template for a preferred Comanche campsite, is unlikely to be unrelated to Comanche use of this area. Descriptions of large Comanche encampments from the

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8 The City of Dallas is in the process of acquiring the Pemberton Hill site for Great Trinity Forest parkland. This site should also be evaluated as part of a National Historic Landmark District
historic record include many references to campgrounds meandering for miles along spring fed, tree shaded creeks. Nearby ridges or other highpoints necessary for surveillance, camp security, and smoke signaling are associated with these camps (Pelon 1993:113-116).

An abundance of preferred Comanche food sources are also present at the these preferred camping areas including pecans, buffalo, deer, plums, persimmons, grapes, and turkey. Many of these resources still exist within this section of what is now called the Great Trinity Forest. The extensive groves of native pecan trees would have enhanced the appeal as a preferred Comanche campsite (Hall 1995) for the autumn trade fair, which is also the season for gathering pecans. A nearby buffalo migration trail, now historic State Highway 352 or Scyene Road, adds convincing additional support to the argument that this area that was recognized and used by Comanches. Also present in this area are building materials including Red Cedar, used for lodge poles and cradleboards and Bois d'arc(used for making weapons).

The ridgeline in this area would have provided both lookouts and windbreaks—highly valued amenities to Comanche campsites (Gelo 2000:301-305). A variety of lookout points create multi-directional panoramic views. The overlook facing south/southwest, just off what it now Scyene Road, would have been uniquely valuable because it provides a clear view all the way west to Cedar Ridge and Cedar Hill, and south toward the major Comanche trail crossing of the Trinity River in what is now northern Ellis County. This overlook could have provided a critical communication point for receiving and relaying smoke signals, a communication strategy used by Comanches (Gelo 2000:305-307). These signals communicated information necessary for the civil defense of campsites, as well as a wide range of other information.

These highpoints are also important to the sacred topography/geography of the Comanche people since they used such places as vision quest sites and medicine places. Plants used as Comanche medicines grow on and below these ridges near the Marker Tree site. Some of this plant material, including Evening Nightshade and Texas Buckeye seeds, contain chemical compounds producing altered states of consciousness associated with shamanic activities. The presence of these plants increases the probability that some of these isolated highpoints would have been considered sacred sites. A necessary component for a Comanche Medicine Place, the presence of a continuously flowing spring-fed stream, is contained in this landscape. A case study in cultural anthropology of Sanapia, a Comanche Medicine Woman contains a photograph of this traditional Comanche healer rinsing medicine plant in a flowing stream. Her biographer reports (Jones 1968:55-56):

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9 Devereux 1997:117-118 [regarding, species of datura, belonging to the Nightshade family] The genus has had an even wider ceremonial application in the Americas, where it has been used for prophecy, divination, diagnosing illness (by providing access to spirit knowledge), medicine (to relieve swellings and to ease the pains of childbirth and rheumatism), in puberty initiation rites, and for the production of visionary states, as it characteristically tends to generate the classic shamanic experiences of spirit flight and transformation into animal form.

10 Devereux 1997:107 He reports that Texas and Mexican Buckeye have been found at Fate Bell Shelter, a site believed to have been used for shamanic purposes. “Texas Buckeye seeds are genuinely hallucinogenic and have been found with Saphora secundiflora seeds [mescal bean] in other, similar archeological contexts, and also with finds of peyote dating to 5000 B.C. in one rock shelter.”
Sanapia follows a fairly rigid field preparation of the medicine plants she collects. As soon as possible after extracting them from the earth, they are taken to the nearest body of flowing water, where they are cut into maniplatable sizes and washed. The immersion in flowing water applies to roots or plant parts other than leaves or flowering bodies; but since Sanapia almost exclusively uses only the root of the plant for medicine, this concern with flowing water seems ubiquitous on medicine-plant-collecting trips.

The importance of the presence of this flowing, spring-fed stream should not be underestimated.11 The easy access to this stream, the nearby highpoint, the presence of plants used in the practice of shamanism and in Comanche medicine—when combined with evidence of a historic Comanche presence in the area—make a strong case for a landscape that would have been recognized and used as a Medicine Place by Comanche healers, and perhaps by some of their most critically ill patients.12 This clustering of environmental resources also suggests use as a vision quest site.

The Storytelling Place

DART project leaders insist, for the purpose of their evaluation of the significance of the Storytelling Place to Comanche cultural heritage, on addressing the importance of this site in isolation from its context with the surrounding landscape.13 While this demand appears inconsistent with recent trends in evaluating traditional cultural properties,14 there are some points to be made by addressing site-specific issues. However it is important to note that when developing “behavioral cartographies” regarding “landscape in American Indian land and resource use studies” it has been recommended that “we first define landscape materially by systematically describing its material components and relationships among them” (Zedeno 2000:105). This paper has described these major landscape components within the areas of Great Trinity Forest parkland recognized by the Comanche Nation as traditional cultural properties and it has also described traditional uses for each of these places.

Although specific information regarding a storytelling place that is also recognized as a sacred site is not traditionally shared with those outside Comanche culture, there is indirect evidence that supports the use of the site a Devon Anderson Park

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11 I’ve visited this site frequently for over 15 years and have always observed a constant flow here, including during the peak of record-breaking droughts and heat waves. This stream flows under the railroad bridge very near it’s origin. There is a documented archeological in association with this stream. The impact of this DART project on the stream and archeological site is of great concern.
12 A Comanche Medicine Place/Vision Quest Place is recognized on the National Register of Historic Places. Medicine Bluff, in the Wichita Mountains, is described on the NR Marker as 300 foot high bluff that was used for vision questing, warriors would take their shield there to absorb power (Medicine) from the sun, and people near death would go there to be healed or to die.
13 An email from John Hoppie dated Aug. 1, 2002 stated, “I have consulted SHPO and FTA and we agree that the purpose of the August 12 meeting is to focus on issues directly related to the storytelling place as they pertain to DART’s Southeast Corridor LRT project....You are welcome to join us on our site visit but we plan only to visit the Storytelling Place and do not plan to visit other sites. The Storytelling Place is the only environmental issue we plan on discussing at this meeting.”
14 Noted in Zedeno’s quote at the beginning of this section on geographical evidence
as a storytelling place. First, and most obviously, it occurs in an area recognized as part of the Comanche territorial range for NAGPRA consultation purposes (Patterson 2001:6). Additional information presented from the historic record indicates that this area was once under the protection of the Comanche Tribe—which meets their definition of claiming and occupying it. A multifaceted view of interactions with the landscape emerges with land use potential that includes elements of preferred camping areas, trading, and the exploitation of a wealth of natural resources for food and building materials. A variety of archeological sites documented within this area provide evidence that this land actually was used for these purposes. The ridges and scenic overlooks would have been recognized as part of a sacred landscape containing wildlife associated with spiritual power and plants with the power to heal and/or to access altered states of consciousness associated with shamanic activities.

The Storytelling Place, located on a high ridge with a panoramic view of the forest and river valley, is located in the realm of the sacred from the point of view of a Comanche spiritual topography. It is above and apart from the nearby springs and creeks that define the preferred camping areas. The mixed hardwood forest and the prairie grass/wildflower meadows on the ridge provide habitat for wildlife associated with spiritual power. Bear, hawks, coyotes, owls, fox, and bobcats are some of the animals known to roam this area and most are still present. These spiritually powerful animals are the main characters in many Comanche stories.

Finally, the physical characteristics of this natural feature make it uniquely functional as a place to tell stories. It is a bowl shaped indentation—a naturally occurring amphitheater in the white rock—that glows in the moonlight. On a recent visit to this site by members of the Comanche Language and Culture Preservation Committee it was noted that the facial expressions of storytellers could be clearly seen in the moonlight illuminating this geological feature. Many important Comanche stories have as the main character a Giant Owl who lives in the moon and comes down to earth and interacts with the animals of the forest. Stories told with a full moon above, and the surrounding forest populated with spiritually powerful animals, would have made a lasting impression on an audience. The unusual and impressive characteristics of this site and the presence of consciousness altering plants in this landscape make a strong case for its use as place for initiation ceremonies. While this is not information that Comanche tradition bearers share with outsiders, there are many ethnographies that document the teaching strategies of cultures whose traditions are transmitted orally. Places that create a dramatic and lasting impression—and altered states of consciousness—are often associated with these strategies for passing on information vital to individual and cultural survival (Pfeiffer 1982). For many nomadic cultures, these important ceremonies are traditionally held at the times and locations of large gatherings of bands.

Conclusion

Cartographic information presented creates a snapshot of the Three Forks not unlike the image of contemporary Dallas. It was a thriving center of commerce and a central place in the web of an extensive trading network. This strategic location in a
convergence of transportation routes, and its extensive natural resources enhancing the quality of human life in the Three Forks area, was shared by many cultures.

Historical documentation has been presented to indicate that Comanches not only used the area but also defended it. And this defines “occupation” from a Comanche perspective. Those who occupy areas leave behind evidence of their presence and it should be assumed that there are many cultural resources remaining in relatively undisturbed areas that archeologists concede have not been adequately surveyed. Additional archeological information reconstructed from surface collections of sites destroyed by land development in the White Rock Creek corridor make the case for extensive use of the area by Native People for a variety of purposes.

A technique used by social scientists referred to as “reading the landscape” was used to identify a clustering of environmental resources in the vicinity of Devon-Anderson and Gateway Parks (the Great Trinity Forest parkland being evaluated for eligibility as a NR Historic Landmark District) that fits a template for a preferred Comanche place. A tree fitting the description of a Comanche Marker Tree (traditionally used to mark a preferred gathering place; a Marker Tree would also communicate to other tribes that the campsite was taken—an efficient method of reserving a favored campsite in an area where many tribes gathered to trade) was located in Gateway Park and recognized by the Comanche Nation as significant to Comanche cultural heritage in 1997.

In addition to cartographic, historical, geographical, and archeological documentation, cultural information about traditional places is also preserved through stories, art, song, family histories, and in many other ways. Some of these traditional ways of knowing may have intuitive, unconscious, or spiritual dimensions to them. These sources of information are often unfamiliar to (and disregarded by) the cognitive processes of engineers and other empirically oriented stakeholders with agendas counterproductive to preservation of traditional cultural properties. And some traditional ways of knowing are not shared with outsiders. Sufficient information has been presented to document the importance of the Three Forks region, including White Rock Creek’s Great Trinity Forest parkland, as traditional cultural property from a Comanche perspective. However, it should not be assumed that all information has, or should, be shared. And this brings up an important question that needs to be opened for discourse: Why does “the other” have the power to make the final determination regarding the significance of a Traditional Cultural Property? This is a culturally subjective decision. Arguably, once a threshold of evidence sufficient to document “occupation” has been met, a sovereign nation should be allowed to identify Traditional Cultural Properties by their own criteria for recognizing such sites.
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Texas Forest Service

Wallace, Ernest and Hoebel, E. Adamson

Zedeno, Maria Nieves
U.S. Department of Transportation  
Federal Transit Administration  
Attention: John Sweek  
819 Taylor St. Suite 8A36  
Fort Worth, Texas 76102  
August 16, 2002

Dear Mr. Sweek:

The Comanche Nation, upon review of the materials presented in a meeting on August 12, 2002 with Dallas Area Rapid Transit and yourself, at DART Headquarters in Dallas, Texas would like to acknowledge an agreement with DART and FTA on a project involving the "Comanche Storytelling Place", located in Devon-Anderson Park, Dallas County, Texas.

This agreement involves transecting the Traditional Cultural Property, no more than 10 feet and minimizing the impact by providing a retaining wall composed of limestone, and at a height maximum for safety and preserving the view, opposite the project.

However, in the future this agreement involves consultation with the Comanche Nation prior to any activities associated with the above-specified location and the stipulation of "No Further advancement into the Comanche Storytelling Place".

It is the intent of the Comanche people to protect this sacred place, elevate its recognition as a National District, Traditional Cultural Property and work with the Texas Historical Commission, Dallas Parks and Recreation, Dallas Area Rapid Transit, White Rock Heritage District and Federal Transit Administration in doing so.

Thank you for your cooperation in this matter, and please feel free to contact me at (380) 492-3754 if I can be of further assistance.

Sincerely,

[Signature]

Jimmy Arterberry  
THPO/NAGPRA/OEP Director  
Comanche Nation

cc: Mr. John Hoppie, DART  
Mr. Mark Denton, Texas Historical Commission  
Ms. Linda Pelon, White Rock Heritage District  
Mr. Michael Hellmann, Dallas Parks and Recreation