

PUBLIC COMMENTS REPORT
WRITTEN COMMENTS SUBMITTED BY WEBSITE, EMAIL & SOCIAL MEDIA

Purpose

The public comments report is in accordance with the NCTCOG Transportation Department Public Participation Plan, which became effective June 1, 1994, as approved by the Regional Transportation Council (RTC), the transportation policy board for the Metropolitan Planning Organization (MPO) and updated on Oct. 9, 2025.

This document is a compilation of general public comments submitted from Saturday, Dec. 20 through Monday, Jan. 19, 2025, via website, email, social media and in person at NCTCOG’s monthly Regional Transportation Council (RTC) meeting. This month, comments related to various transportation initiatives were in the majority.

Additionally, comments can be submitted through Map Your Experience, the Transportation Department’s online mapping tool. This tool allows users to drop a pin on a location in the region and leave a detailed comment. The tool received 5 new comments related to bicycle/pedestrian and roadway conditions. You can view these new comments as well as past comments by visiting:<http://nctcoggis.maps.arcgis.com/apps/CrowdsourcingReporter/index.html?appid=b014e6d39b604b3ca329d9094ed1e9e2>.

Air Quality

Facebook –

1. 📍 Emissions inspections required in Collin, Dallas, Denton, Ellis, Johnson, Kaufman, Parker, Rockwall, Tarrant counties 📍 – NCTCOG Transportation Department



The inspection is only required in counties that are over a certain population. – Howard Nunn

I have a 2015 and just got my tags renewed. All with OUT a emission test in my county. So this is BS – Ladona Jackson Prater

no emissions on vehicles 25 years of age or older classic vehicle registration is \$50 for 5 years in Texas – John Cook

I say the state dropped the wrong inspection, it should have been the emissions test dropped and kept the safety inspection for every county – Terry Bates

They don't require it in some places but still charge you for an inspection even if one wasn't performed on the vehicle. Talk about ROBBERY – Michael Ashworth

Emission testing in only certain counties is laughable. So they think the cars leaking emissions from other counties isn't going to cross over into their county 😏 It's in the air. You cannot separate it 😂 So it should be all or none. Who makes these rules? – Crystal Hill DeWall

To view more comments on this post, visit:

<https://www.facebook.com/NCTCOGtrans/posts/pfbid0T2SM9SEohG9bL8wbEkHbTxP92TK8ePNmyMpb7f6cHsJvAXAYcY2Zi7Ue23TjgrHyl>

Public Involvement

Facebook –

1The January Regional Transportation Council Meeting will be held tomorrow at 1 pm. Find this month's agenda at the link in our comments below.. – NCTCOG Transportation Department



More conflicts of interest between DCTA and Lewisville..... DCTA, nor its Vice-Chair (who is also mayor of Lewisville, I might add) has yet to explain that \$4-5K payment "mistake" last year. Time for an audit! – Bonni Crisfulli

Safety

Facebook -

1. Speeding is the #1 factor in serious injury and fatality crashes in DFW. Life has no reset buttons. Drive safe, not fast. – NCTCOG Transportation Department



Yes – Sandra Shelby

Aaammeeenn to that!!!! – Karen Newhouse

Real talk 😊 – James Barnes

Parte dos. **Translation:** Part two— Julio Gonzalez

AMEN Amen Amen 🙏🙏🙏 – Mary Seamster

Other

LinkedIn -

1. Attended NCTCOG Transportation meeting yesterday and it was great to connect with colleagues Tony Kimmey, P.E. , Shane Tully, Dustin McKinney, PMP, Andrew Kissig and many others. The one that I was very happy to see and sad to learn is leaving us is Brendon Wheeler, PE, CFM. Brandon has been exceptional to work with. From all the speaking engagements with American Society of Highway Engineers (ASHE) - DFW Section to just being there when I was looking for information, he was always there to answer any questions, provide information when I was looking at projected future growth trying to pre-position the firm i was with and everything in between. Brandon, Thank you. You will be missed. And yes he really is that tall, or I might be that short. LOL— Michael F. Knowles, CPSM



Thanks for the well wishes Michael! And great to see you yesterday. – Brendon Wheeler, PE, CFM

Facebook –

1. North Texas has experienced exponential growth over the years, reshaping the region. This January, we're kicking off the year with our #TopicOfTheMonth series by highlighting growth. This month, we'll explore the rising population, its impact on transportation and take a look into the future of the region.

Read more about growth in North Texas at the link in our comments below!



I wouldn't consider this region well-positioned to meet the demands of growth if our regional public transportation system is facing an existential crisis due to conflicts with the suburbs — Randy DeJesus

I agree — John Dickinson

Texas needs ONE toll authority. Having multiple is stupid — Kurt Dorr

Stealing business from other cities is not growth it's called corruption — Danny Cirulli

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January 5, 2026

Ken Kirkpatrick
General Counsel
North Central Texas Council of Governments
616 Six Flags Drive
Arlington, Texas 76011

*Re: TxDOT Feasibility and Corridor Studies Support an **Interstate 287**; another far superior "reasonable alternative" to high-speed rail left uninvestigated in the legally precluded "environmental analysis"*

Dear Mr. Kirkpatrick:

As you know, I represent Hunt Realty Investments, Hunt Consolidated, Inc., Ray L. Hunt and certain other affiliated and/or related entities (collectively, "Hunt").

The purpose of this letter is to inform you, as chief counsel to the North Central Texas Council of Governments (the "NCTCOG"), that the Texas Department of Transportation ("TxDOT") has completed final reports concluding that upgrading U.S. Highway 287 into a regular interstate is both economically viable and feasible. As a courtesy, I provide the web address containing these studies. See <https://www.txdot.gov/projects/projects-studies/statewide/us287-texas-corridor-study.html>.

You will quickly see that this proposed corridor would provide interstate highway travel between Fort Worth and Corsicana, where travelers could choose to either access Interstate 45 to Houston or continue on a future Interstate 287 into Louisiana.

TxDOT has concluded that this alternative would reduce traffic on I-45 by over 1,200,000 vehicles each year and directly benefit numerous cities in our region.

If you, Michael Morris, or any other person in the NCTCOG Transportation Department takes the time to actually review these studies even at a cursory level, it will become readily apparent that the per mile cost of this Highway 287 upgrade would be just a very small fraction of the per mile cost to construct the now removed from consideration alignment "2(b)."

This proposed reasonable alternative would also not cause billions of dollars of economic "loss[es]" each year, as the Boston Consulting Group concluded would occur under the now-scuttled alignment "2(b)."

Ken Kirkpatrick
General Counsel
January 5, 2026
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I memorialize that I have provided you a number of obvious reasonable (actually remarkably preferable and superior) alternatives to Dallas-to-Arlington Entertainment District-to-Fort Worth higher-speed rail (beyond objectively showing the numerous legal preclusions), legally required to be considered in any alleged “environmental analysis,” but that continue to be ignored. This U.S. Highway 287 upgrade is yet one more.

NCTCOG has a binary choice regarding alignment “2(b)”:

- (1) NCTCOG can divert and subsequently waste one million dollars (\$1,000,000.00) to fund conjectural legal expenses responding to letters discussing the problems with alignment “2(b)”

or
- (2) NCTCOG can make the FTA aware of its own conclusion that alignment “2(b)” is “fatally flawed,” not “possible,” and therefore ineligible for and withdrawn from future consideration as part of any NEPA application process – which action would moot any future letters regarding alignment “2(b).”

Further, I once again bring to your attention (as they may possibly relate to future NCTCOG considerations) the following facts:

The so-called “Alignment 2(b)” would undeniably threaten, irreparably harm and severely damage the Reunion development as well as the potential for new economic activity adjacent to Dallas’ new \$3 billion Kay Bailey Hutchison Convention Center.

“Alignment 2(b),” would contravene and interfere with the City’s and Hunt’s legal and lawful rights under their Reunion Master Agreement – in place since 1975.

NCTCOG’s continued action involving the so-called “Alignment 2(b)” is in defiance and disregard of the Resolution passed unanimously by the City Council of the City of Dallas on June 12, 2024.

Please professionally confirm your receipt of this letter and compliance with its demands.

Sincerely,

/s/ Eric Gambrell

Eric Gambrell

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January 6, 2026

Ken Kirkpatrick
General Counsel
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616 Six Flags Drive
Arlington, Texas 76011

Re: The Rejected, Legally and Procedurally Precluded, and Fatally Flawed Fort Worth-to-Houston Corridor ID "Project"

Dear Mr. Kirkpatrick:

As you know, I represent Hunt Realty Investments, Hunt Consolidated, Inc., Ray L. Hunt and certain other affiliated and/or related entities (collectively, "Hunt").

As a courtesy, I provide to you, in your capacity as the chief counsel for the North Central Texas Council of Governments (the "NCTCOG"), the following salient and objectively cogent summary points regarding the rejected, legally precluded and otherwise fatally flawed process surrounding the so-called Fort Worth-to-Houston Corridor Identification and Development "program."¹ You will readily conclude after reviewing the below that any continued efforts to proceed in any manner with that project are legally and practically futile and would constitute a gross waste and misuse of taxpayer dollars and regional resources.

• *The FRA has already rejected 90% of the route proposed to be studied in the supposed Fort Worth to Houston Corridor ID program (the Dallas-to-Houston high-speed rail corridor) precluding any federal taxpayer support.*

In April 2025, the Federal Railroad Administration (the "FRA") publicly pulled all federal funding for high-speed rail in the Dallas-to-Houston corridor, including funds for any pre-construction work, which includes all Corridor ID program funds (Steps 1, 2 and 3). Listed below are examples of quoted statements by various representatives of the Department of Transportation, including the FRA, terminating and criticizing the Dallas-to-Houston Corridor ID project:

¹ While this document is intentionally in summary format, more substantive discussion on these points, as well as other points conclusively showing the myriad inefficacies of and legal impotency regarding the Fort Worth-to-Houston Corridor ID program may be provided in future and separate correspondence.

“FRA [] is in agreement that underwriting this project is a waste of taxpayer funds”

“[Dallas-to-Houston] project was proposed as a private venture. If the private sector believes this project is feasible, they should carry the pre-construction work forward, rather than relying on . . . the American taxpayer to bail them out.”

“[the termination] reflects a recognition by [] FRA that federalizing [Dallas-to-Houston high-speed rail] is not the best use of taxpayer funding.”

<https://www.transportation.gov/briefing-room/us-transportation-secretary-sean-p-duffy-announces-agreement-save-taxpayers-over-60>

For context, the FRA-rejected 240-mile Dallas-to-Houston high-speed rail corridor accounts for approximately **90%** of the entire 270-mile Fort Worth-to-Houston corridor that Mr. Morris proposes federal funds be used to study under the Corridor ID program. Stated alternatively, the Step 1 work that Mr. Morris advocates be completed for the Fort Worth-to-Houston corridor includes only about 10% of rail line that has not *already* been determined to be categorically *excluded* from federal funds (and kicked out of the Corridor ID program by the FRA).

In the face of this blunt FRA rejection, Michael Morris nonetheless proceeded to represent to the NCTCOG Executive Board that the “FRA is *wanting* us to look at high-speed rail from Fort Worth to Houston.” September 23, 2025 NCTCOG Executive Board. Mr. Morris even suggested that the FRA might be inclined to provide federal funds for a high-speed rail line between Fort Worth and Houston. October 23, 2025 NCTCOG Executive Board (“you may end up with a program that includes funds from FRA”). Of course, Mr. Morris completely omitted the fact that the FRA had already flatly rejected nearly all of the proposed Fort Worth-to-Houston route (and all federal funds related to that 240-mile route).

The determination by the FRA that it would not allow the use of federal funds for the Dallas-to-Houston portion of the Fort Worth-to-Houston corridor renders moot and completely wasteful any further Corridor ID efforts.

●NCTCOG/Michael Morris appear to have accomplished no Corridor ID Step 1 work for over a year and a half, then claim a supposed emergency – the City of Dallas cannot be muscled or cornered.

The FRA publicly announced the \$500,000 Step 1 Corridor ID program grant agreement with NCTCOG regarding a Fort Worth-to-Houston route in December 2023 – over two years ago. By all reasonable accounts, the NCTCOG Transportation Department allowed work related to that Fort Worth-to-Houston corridor to be delayed and effectively idle for over a year and a half – with no actual Step 1 work commenced during that extended period.

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After the Corridor ID program apparently slumbered for over 18 months, Mr. Morris provided his first substantive status report to either the RTC or the NCTCOG Executive Board regarding the Fort Worth-to-Houston Corridor ID grant (in, respectively, September and October 2025). At those public meetings, the stark lack of progress was confirmed, including that (1) no Step 1 work had even started after all that time, (2) a vendor had been proposed but was not even legally authorized to commence any work, and (3) the deadline to complete and submit to the FRA completed Step 1 work (that Mr. Morris predicted would take approximately ten (10) months) was in April 2026 – less than four (4) months away.

Michael Morris articulated no explanation for the over 18-month dormancy regarding actual Step 1 work on the Fort Worth-to-Houston Corridor ID project. Upon reasonable information and belief, that project was effectively suspended (or at least sloth-like dragged along) in favor of the *now-voided and rejected* Amtrak Corridor ID grant for the Dallas-to-Houston corridor. Available facts lead to the rational conclusion that only *after* the FRA publicly pulled all federal funds from the Dallas-to-Houston Corridor ID project (terminating the Dallas-to-Houston Corridor ID program), did significant efforts to jump-start any actual Step 1 work on the Fort Worth-to-Houston Corridor ID program move forward.

Comically, after apparently slumbering around for over a year and a half, Mr. Morris arose to claim a supposed exigency in obtaining approval from both the RTC and the NCTCOG Executive Board to enter into a services contract with a proposed vendor.

The City of Dallas cannot be pressured into agreeing to any route. Neither the NCTCOG Transportation Department nor Michael Morris has any jurisdiction over the City of Dallas.

As of this date – *over two years* since the announcement of the Fort Worth to Houston Corridor ID grant, no Step 1 work has commenced.

•*The Corridor ID Request for Proposals process was legally flawed, precluding any contract with the proposed vendor (and, in turn, any Step 1 Fort Worth-to-Houston Corridor ID work).*

At the October 2025 meeting of the NCTCOG Executive Board, Michael Morris, in his capacity as NCTCOG Transportation Director, recommended that the Executive Board vote to award a contract for hundreds of thousands of dollars to a private vendor to commence and complete certain work as stated in a “request for proposal” regarding “Step 1 of the FRA Corridor ID program for the Fort Worth to Houston high-speed rail corridor.” *See* North Central Texas Council of Governments Metropolitan Planning Organization Request for Proposals FRA Corridor ID, dated October 25, 2024, as amended on November 7, 2024 (the “RFP”). Mr. Morris reported to the NCTCOG Executive Board that, pursuant to the RFP process, a consulting firm had supposedly been selected as the consultant for the Step 1 work pursuant to the terms as specifically stated in the RFP and sought the Executive Board’s approval of a contract with that vendor.

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No contract can be awarded (and no work can commence) under or based upon the RFP, including because, among other things, that process was legally flawed.

As background, on October 25, 2024, Mr. Morris supervised an invitation for potential vendors “to respond to the Request for Proposals,” which noticed a Pre-Proposal Conference on November 7, 2024. Potential bidders were required pursuant to the notice to submit proposals by November 22, 2024.

On November 7, 2024, the Pre-Proposal Conference commenced. The “Sign-In” sheet for that bidder conference included representatives from nineteen (19) different firms as well as Mr. Morris and members of his staff.

At the Pre-Proposal Conference, Mr. Morris led the presentation, which included notifying the bidders in attendance of, among other things, the scope and timing of the contemplated work for Step 1. The presentation materials included both charts, an agenda, and the RFP (in redline form showing the changes from the original version). The *attending* potential consulting firms were notified *at the meeting* that the RFP had been amended that very day to no longer “preclude” the ultimately retained consultant for “Step 1 of FRA’s Corridor ID process” from “participation in future procurements for Step 2 or Step 3.”

This amendment constituted a major modification to the RFP. Qualified consultants might be significantly less interested in participating in Step 1 if that would legally prohibit them from bidding for Steps 2 or 3. Potential consultant candidates may not have attended the Pre-Proposal Conference or determined to not submit a bid because they concluded that the RFP, in its original form, was not economically attractive.

The significant change to the RFP would require a new request for proposals process (even if there was any rational basis to continue with any efforts relating to the Fort Worth-to-Houston Corridor ID program, which there is obviously not).

● *The Corridor ID Request for Proposals process is legally void due to changed circumstances, including relating to the six (6) year old EIS.*

The RFP process, even if not procedurally flawed, would be nonetheless void and insufficient due to changed circumstances. The work to be completed as stated in the RFP is no longer applicable or possible, but has been mooted.

For example, the RFP presumes and assumes and is fundamentally based upon the “partnership” of and active required “collaboration with **Amtrak** regarding 240 of the 271 miles in the “corridor” applicable to the RFP. The Step 1 work subject to the RFP further requires the consultant to rely on **Amtrak** “as the basis to develop an SDP for the Fort Worth to Houston HSR corridor.” The RFP mandates that “[t]he consultant will also develop a list or inventory of items needed from **Amtrak**.”

However, as part of the rejection of the Dallas-to-Houston Corridor ID program referenced above, Amtrak has been precluded by the federal government from participating in the Step 1 process. As a result, significant work listed in the RFP that explicitly requires Amtrak participation cannot be performed, voiding the RFP's applicability. Bluntly, it is impossible to complete the Step 1 work as stated in the RFP, rendering the RFP a nugatory.

Moreover, the RFP requires that the consultant copy from the six (6) year old Environmental Impact Statement regarding possible future Dallas-to-Houston high-speed rail (the "EIS"). As we have previously reported, the EIS is legally stale. For example, the proposed technology for the rolling stock studied in the EIS is obsolete and has been replaced with newer and different technology.

As shown above, no consultant can be retained by NCTCOG pursuant to the RFP. The RFP is void, including due to significant changes in the scope of work. As a matter of law, for any consultant to be hired, Mr. Morris would be required, at the least, to commence a new request for proposals process, allow for competition in a new properly detailed request for proposals that lists the actual and correct scope of work to complete Step 1.

•*The NCTCOG Transportation Department Request for Proposals includes an impossible Project Schedule.*

The "Project Schedule" in the above-discussed RFP states a timeframe and deadlines that are likewise no longer applicable, viable or even possible. This further renders the RFP process legally void, precluding any contract with the proposed vendor as pushed for by Mr. Morris.

The RFP discussed at the Pre-Proposal Conference included a "Draft Project Schedule" table, which provided for a ten (10) month timeframe from the date the chosen consultant was given "Notice to Proceed" in April 2025 to the "Submission" of the "Final Performance Report to FRA" in January 2026. Built into this ten (10) month period were several approximately 15 and 30-day required "FRA Review Period[s]" to assess and monitor work as the consultant's Step 1 work proceeded, which totaled four and a half (4 ½) months. Potential consultants for the Step 1 work would reasonably principally consider whether they had the requisite staff or "bandwidth" to bid for the Step 1 work in this very specific timeframe.

Based on the RFP, the Step 1 work will take ten (10) months, yet Mr. Morris alleges he has agreed to an amended "FRA grant agreement" that would provide no more than around four (4) months to complete Step 1 by the alleged new deadline. Of course, this highly truncated "contract performance period" does not even consider the time required to complete a statutorily compliant new request for proposals process, much less requisite approvals by the NCTCOG Executive Board following that process. Given that Mr. Morris has built in four and a half (4 ½) months of multiple "FRA Review Period[s]," there is effectively no time at all for any consultant to complete the Step 1 work by the deadline in the alleged amended "FRA grant agreement."

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General Counsel
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As legally problematical, potential bidders reasonably anticipated that the Step 1 work would be conducted in **2025**. Now, all (or nearly all) of the work could be conducted no earlier than **2026**, a different year. Qualified consultants who potentially determined they did not have capacity to complete the Step 1 work in 2025 (and therefore did not submit a bid) may well have such capacity in 2026. This further shows the failure of the request for proposals process precluding any contract award.

•*The Fort Worth-to-Houston Corridor ID Program would be a subsidy to the private developer of possible future Dallas-to-Houston high-speed rail, even though that private entity agreed with both NCTCOG and the Houston area MPO to not accept federal funding – however, the Corridor ID program would require federal funding.*

Texas Central has entered agreements with both NCTCOG and the Houston-Galveston Area Council (the Houston-area metropolitan planning organization) to not accept federal grants for the possible future Dallas-to-Houston high-speed rail route.

Moreover, a representative of Texas Central has publicly stated that it was in support of the FRA's withdrawal of federal funds from the Dallas-to-Houston Corridor ID program, stating, "[w]e agree . . . that this project should be led by the private sector." Its lead "investor" added:

"We are proud to have stepped in as the private sector sponsor of the Texas high-speed rail, and today's announcement is good news for the overall project. The first Trump Administration gave this project the green light, but after President Trump left office the project got hung up in the politics of the Biden Administration's efforts to jam Amtrak and politics into the equation. We agree with Secretary Duffy that this project should be led by the private sector, and we will be proud to take it forward. This project is shovel-ready and will create significant new jobs and economic growth for Texas as part of President Trump's efforts to boost the U.S. economy."

<https://www.texasrailadvocates.org/post/fort-worth-investment-firm-says-texas-high-speed-rail-project-is-shovel-ready-as-amtrak-involvement-winds-down>

The Fort Worth-to-Houston Corridor ID project is founded upon and requires federal funding and is therefore, on yet another basis, legally and practically precluded.

•*Michael Morris represented to the Federal Transit Administration that "[t]he . . . Dallas-to-Houston corridors will be funded through private-sector initiatives."*

Even Michael Morris has stated that the Dallas-to-Houston corridor is to be *privately* funded. But, as stated above, the Fort Worth-to-Houston Corridor ID project is foundationally based on federal funding (which, in any event, has already been rejected by the federal government).

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The Fort Worth-to-Houston Corridor ID project is practically and legally futile.

● ***Nearly two-thirds of the Dallas-to-Houston route is outside the jurisdiction of the NCTCOG.***

Over 150 miles of the 240 miles of the proposed Fort Worth-Houston corridor Michael Morris seeks to advance in the Corridor ID program are *outside the NCTCOG's geographic jurisdiction*. For emphasis, nearly two-thirds of that proposed route are not even within the 16-county area over which the RTC is charged to provide any policy guidance or have involvement. Contextually, if this attempted extraterritorial grab is acceptable, the RTC would by logical extension likewise have the jurisdiction over a rail line all the way to California. Of course, that is preposterous.

Mr. Morris has further not provided information to the RTC or the NCTCOG Executive Board as to the position of *other* metropolitan planning organizations, including most significantly the Houston-Galveston Area Council (“H-GAC”), regarding a Corridor ID project that runs directly through the geographical jurisdiction of these other councils of governments.

● ***The RTC has already removed alignment “2(b)” a/k/a the “Eastern Alignment” from consideration.***

The RTC has already removed, in an official vote at its November 2025 meeting, alignment “2(b)” (a/k/a the “Eastern Alignment”) from consideration as a potential Dallas-to-Arlington Entertainment District-to-Fort Worth route. That admittedly fatally flawed and legally precluded route has been rejected.

In addition, the I-30 Corridor route between Fort Worth and Dallas has already been rejected in a FRA Final Report that was coordinated by NCTCOG.

Finally, the Dallas City Council, in a June 12, 2024 Resolution, additionally rejected alignment “2(b)” in precluding above-ground high-speed rail through Downtown Dallas.

As a result of *each* of the above rejections of alignment “2(b),” there is no reasonable or legal basis to include that route in any Corridor ID program scope of work.

● ***Alignment “2(b)” (a/k/a the “Eastern Alignment”) is otherwise legally precluded and fatally flawed.***

Among the epically long list of legal preclusions and fatal flaws associated with the now-rejected and scuttled alignment “2(b),” it would:

- be precluded under the express terms of the Master Agreement between the City of Dallas and Hunt;

- cause billions of economic losses to the City of Dallas each year as confirmed by both the Boston Consulting Group *and* leading Texas economist Ray Perryman;

- imperil the \$6 billion planned Hunt development, put in jeopardy the economic viability of the planned new Kay Bailey Hutchison Convention Center, and be a hard hit against the vitality of Downtown Dallas even as it deals with the recent announcement of AT&T's move to Plano;

- cause massive environmental damage to the City of Dallas, including West Dallas, Martyrs Park, the Harold Simmons Park, the Ron Kirk Pedestrian Bridge and the Margaret Hunt Hill and Margaret McDermott Bridges; and

- actually slow down and create congestion on I-30 due to its cannibalization and stripping away of TxDOT's TEXPress managed lanes, which successfully keep traffic moving at fast speeds.

● ***NCTCOG representatives and Boston Consulting Group state that the Trinity Railway Express (the "TRE") can be upgraded to have competitive travel times at a tiny fraction of the cost of higher-speed rail.*** As an example, the Boston Consulting Group report concludes that the Trinity Railway Express (the "TRE") can be upgraded to have competitive travel times at a tiny fraction of the cost of higher-speed rail.

It is clear that any efforts to move along the legally and procedurally flawed Fort Worth-to-Houston Corridor ID project (including any retention of any vendor as a result of the impotent request for proposals process) is not only precluded, but would constitute a gross waste and misuse of taxpayer funds (including regional resources).

NCTCOG has a binary choice regarding alignment “2(b)”:

- (1) NCTCOG can divert and subsequently waste one million dollars (\$1,000,000.00) to fund conjectural legal expenses responding to letters discussing the problems with alignment “2(b)”

or

- (2) NCTCOG can make the FTA aware of its own conclusion that alignment “2(b)” is “fatally flawed,” not “possible,” and therefore ineligible for and withdrawn from future consideration as part of any NEPA application process – which action would moot any future letters regarding alignment “2(b).”

Further, I once again bring to your attention (as they may possibly relate to future NCTCOG considerations) the following facts:

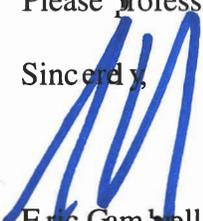
The so-called “Alignment 2(b)” would undeniably threaten, irreparably harm and severely damage the Reunion development as well as the potential for new economic activity adjacent to Dallas’ new \$3 billion Kay Bailey Hutchison Convention Center.

“Alignment 2(b),” would contravene and interfere with the City’s and Hunt’s legal and lawful rights under their Reunion Master Agreement – in place since 1975.

NCTCOG’s continued action involving the so-called “Alignment 2(b)” is in defiance and disregard of the Resolution passed unanimously by the City Council of the City of Dallas on June 12, 2024.

Please professionally confirm your receipt of this letter and compliance with its demands.

Sincerely,



Eric Campbell

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January 12, 2026

Ken Kirkpatrick
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Arlington, Texas 76011

*Re: TxDOT is **already** studying intercity passenger rail between Dallas-Fort Worth and Houston*

Dear Mr. Kirkpatrick:

As you know, I represent Hunt Realty Investments, Hunt Consolidated, Inc., Ray L. Hunt and certain other affiliated and/or related entities (collectively, "Hunt").

The purpose of this letter is to inform you, in your capacity as a lawyer to the Regional Transportation Council (the "RTC"), the policy committee of the North Central Texas Council of Governments (the "NCTCOG"), that **the Texas Department of Transportation ("TxDOT") is already in the process of considering intercity passenger rail service between Dallas-Fort Worth and Houston.**

For your information, this route has already been accepted by the Federal Railroad Administration into the Corridor Identification program. *See* <https://railroads.dot.gov/elibrary/fras-corridor-id-obligation-status-report>.

This TxDOT-proposed Dallas-to-Houston passenger rail corridor exemplifies another in the long list of preferable, superior and reasonable alternatives to the now-scuttled alignment "2(b)," which I have brought directly to your attention but which have been ignored in the supposed but legally invalid "environmental analysis."

This TxDOT-proposed passenger rail corridor includes a station actually in Bryan-College Station (versus roughly 45 minutes away as proposed for possible future Dallas-to-Houston high-speed rail). It would further not cause billions of dollars in "loss[es]" each year that would have been suffered by the City of Dallas if alignment "2(b)" had not been removed from consideration.

NCTCOG has a binary choice regarding alignment “2(b)”:

- (1) NCTCOG can divert and subsequently waste one million dollars (\$1,000,000.00) to fund conjectural legal expenses responding to letters discussing the problems with alignment “2(b)”

or
- (2) NCTCOG can make the FTA aware of its own conclusion that alignment “2(b)” is “fatally flawed,” not “possible,” and therefore ineligible for and withdrawn from future consideration as part of any NEPA application process – which action would moot any future letters regarding alignment “2(b).”

Further, I once again bring to your attention (as they may possibly relate to future NCTCOG considerations) the following facts:

The so-called “Alignment 2(b)” would undeniably threaten, irreparably harm and severely damage the Reunion development as well as the potential for new economic activity adjacent to Dallas’ new \$3 billion Kay Bailey Hutchison Convention Center.

“Alignment 2(b),” would contravene and interfere with the City’s and Hunt’s legal and lawful rights under their Reunion Master Agreement – in place since 1975.

NCTCOG’s continued action involving the so-called “Alignment 2(b)” is in defiance and disregard of the Resolution passed unanimously by the City Council of the City of Dallas on June 12, 2024.

Please professionally confirm your receipt of this letter and compliance with its demands.

Sincerely,

/s/ Eric Gambrell

Eric Gambrell

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January 20, 2026

Ken Kirkpatrick
General Counsel
North Central Texas Council of Governments
616 Six Flags Drive
Arlington, Texas 76011

Dear Mr. Kirkpatrick:

As you know, I represent Hunt Realty Investments, Hunt Consolidated, Inc., Ray L. Hunt and certain other affiliated and/or related entities (collectively, "Hunt").

On Tuesday, January 6, 2026, I provided you a letter listing numerous legal and procedural infirmities and fatal flaws associated with the rejected Fort Worth-to-Houston Corridor Identification and Development "program." That letter objectively and conclusively shows that any efforts to move that project along, including without limitation any retention of any vendor to conduct any Step 1 work, would constitute a gross waste and misuse of taxpayer funds (including regional resources).

It is not evident from the public record that the January 6, 2026 letter has been provided to the Members of the Executive Board of the North Central Texas Council of Governments (the "NCTCOG").

You may consider your fiduciary, legal and other duties in relation to keeping the Executive Board informed on relevant matters falling within their jurisdiction.

NCTCOG has a binary choice regarding alignment "2(b)":

- (1) NCTCOG can divert and subsequently waste one million dollars (\$1,000,000.00) to fund conjectural legal expenses responding to letters discussing the problems with alignment "2(b)"

or
- (2) NCTCOG can make the FTA aware of its own conclusion that alignment "2(b)" is "fatally flawed," not "possible," and therefore ineligible for and withdrawn from future consideration as part of any NEPA application process – which action would moot any future letters regarding alignment "2(b)."

Ken Kirkpatrick
General Counsel
January 20, 2026
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Further, I once again bring to your attention (as they may possibly relate to future NCTCOG considerations) the following facts:

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Please professionally confirm your receipt of this letter and compliance with its demands.

Sincerely,

/s/ Eric Gambrell

Eric Gambrell

ERIC GAMBRELL
214.969.2799/214.969.4343
egambrell@akingump.com

January 26, 2026

Ken Kirkpatrick
General Counsel
North Central Texas Council of Governments
616 Six Flags Drive
Arlington, Texas 76011

Dear Mr. Kirkpatrick:

As you know, I represent Hunt Realty Investments, Hunt Consolidated, Inc., Ray L. Hunt and certain other affiliated and/or related entities (collectively, "Hunt").

As a courtesy and for your information and attention, I provide the below excerpts from the text of the Resolution unanimously passed by the Councilmembers of the Dallas City Council on January 21, 2026:

“[T]he City Council reaffirms its position on above-ground rail lines as stated in Section 1 of Resolution No. 24-0876, approved on June 12, 2024, which reads as follows: “That, at this time, except for streetcar expansion projects currently under consideration, **the City Council does not support construction of new above-ground passenger rail lines through the Central Business District, Uptown, and Victory Park areas.**”

NCTCOG has a binary choice regarding alignment “2(b)”:

- (1) NCTCOG can divert and subsequently waste one million dollars (\$1,000,000.00) to fund conjectural legal expenses responding to letters discussing the problems with alignment “2(b)”

or

- (2) NCTCOG can make the FTA aware of its own conclusion that alignment “2(b)” is “fatally flawed,” not “possible,” and therefore ineligible for and withdrawn from future consideration as part of any NEPA application process – which action would moot any future letters regarding alignment “2(b).”

Ken Kirkpatrick
General Counsel
January 26, 2026
Page 2

Further, I once again bring to your attention (as they may possibly relate to future NCTCOG considerations) the following facts:

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“Alignment 2(b),” would contravene and interfere with the City’s and Hunt’s legal and lawful rights under their Reunion Master Agreement – in place since 1975.

NCTCOG’s continued action involving the so-called “Alignment 2(b)” is in defiance and disregard of the Resolution passed unanimously by the City Council of the City of Dallas on June 12, 2024.

Please professionally confirm your receipt of this letter and compliance with its demands.

Sincerely,

/s/ Eric Gambrell

Eric Gambrell