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**RE: Cinder Bed Road Bikeway**, Fairfax County Project Number – 1400137-15, State Project Numbers – EN14-029-107, P101, R201, UPC #106143,  
<https://www.fairfaxcounty.gov/transportation/projects/cinder-bed-road-bikeway>

Dear FCDOT Cinder Bed Road Bikeway Project Team

I am writing this letter as the Primary Conservator of Friends of Accotink Creek and as a resident of Kingstowne, Lee District, to provide comments on the proposed Cinder Bed Road Bikeway Project (Project). According to the presentation and extremely limited information on the Project webpage, the Project is funded with County funds and Federal Transportation Alternatives Program (TAP) Grant funds. I also understand that Fairfax County received approval from the Northern Virginia Transportation Authority (NVTA) to transfer \$2,763,242 of existing balance from four other NVTA Regional Surface Transportation Program (RSTP)-funded projects to the Project.<sup>1</sup> The Project had not previously received RSTP funding and NVTA requested that the Virginia Department of Transportation reallocate the funds to the Project in the Transportation Improvement Program and the State Transportation Improvement Program.

According to the information presented in the Cinder Bed Road Bikeway Meeting video, the stated purpose of the Project is to provide a safe, short route (2 miles) to be used by commuters on bicycle, and presumably pedestrians, between Fort Belvoir and the Franconia-Springfield Metro Station. The Project link to the trail network along the Fairfax County Parkway located to the south. The presenters at the public meeting indicated the goal is to support multi-modal transit and encourage the reduction in accessing the metro via car. As a resident, I support this goal and the encouragement of multimodal transit. That said, given the \$14,000,000 cost of this Project, and as someone concerned about the effects of forest fragmentation, increases in impervious surfaces within the Long Branch watershed, a sub-watershed within the Accotink Creek watershed, and the effects of light pollution on wildlife, I have the following comments and requests for additional information on this project.

1. The Project presentation indicated that environmental studies had been completed with respect to cultural resources, threatened or endangered species and sensitive habitats, floodplains, and trees, and the presenters indicated knowledge that wetland seeps are known within the vicinity of the proposed bikeway. The Presentation board available on the Project site indicate the location of Long Branch and its tributaries, and the 100-year floodplain, but

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<sup>1</sup> <https://thenovaauthority.org/wp-content/uploads/2021/01/9.-Approval-of-Fairfax-County-RSTP-Transfer-Request-from-Multiple-Projects-to-Cinderbed-Road-Bikeway.pdf>

- does not indicate locations of wetlands or other natural resources on the Project maps. These should be presented on the Project boards and be made available to the public.
2. The presenters indicated that the Project would be evaluated by VDOT as a Categorical Exclusion under the Programmatic Agreement (PA) between the Federal Highway Administration, Virginia Division and VDOT regarding the Processing of Actions Classified as Categorical Exclusions (CE) for Federal-Aid Highway Projects. The National Environmental Policy Act of 1969 (NEPA) and the Regulations for Implementing the Procedural Provisions of NEPA direct Federal agencies to consider the environmental impacts of their proposed major Federal actions through the preparation of an environmental assessment of environmental impact statement unless a particular action is categorically excluded. Appendix A of the PA lists the CEs in 23 CFR § 771.117(c). Appendix B of the PA lists actions that would be considered CEs which this project clearly does not fit under. Appendix C lists the VDOT CE Determination Qualifying Thresholds that would disqualify a project from a CE. The presenters indicated that information is being provided to VDOT for completion of the VDOT Programmatic. Under which PCE category does this Project fall under that justifies the CE?
  3. The Project website has the presentation and the maps. It provides no environmental information that would allow the public to evaluate this project with respect to environmental effects. This project deserves full disclosure of the planning studies, environmental mapping of resources, and results of consultations with the US Fish and Wildlife Service, the Virginia Natural Heritage Program, and the Virginia Department of Historic Resources, and the assessment of impacts resulting from the project, including tree clearing, stormwater runoff, forest fragmentation, floodplains and the adverse effects of nighttime lighting on wildlife. Without this information the public cannot form an educated opinion on the project or provide useful feedback. All of information prepared in support of the CE should be made available to the public for review and evaluation.
  4. The stated goal of the Project is to provide a route for commuters from Fort Belvoir area via the Fairfax County Parkway to the Franconia-Springfield metro station that will allow multi-modal transit. Given that the users would be limited by the number of bicycle parking slots at the metro station, how many safe bicycle parking locations will be available at the metro station? Does that number justify the \$14 million dollar price tag for this project.
  5. Questions were asked during the presentation of what alternatives were evaluated that would have provided similar multi-modal access to the Metro station. The consultant indicated that studies were done and alternatives evaluated. FCDOT needs to make these studies available on the Project website as well as those studies demonstrating the purpose and need of this Project included projected number of users, and their travel routes. There are paved pedestrian paths along Telegraph Road, and along Jeff Todd Way, that link to other paved paths along Beulah Road, Hayfield Road, Manchester Boulevard and the Franconia-Springfield Parkway, that provide access to the Metro, without adding to impervious surface, cutting down trees or adding nighttime lighting where there is none now. Without this additional information citizens cannot make an informed decision or provide useful comment on the benefits and impacts of this Project.
  6. A question was raised at the meeting as to what evaluations were done on the effects of nighttime lighting at the meeting. It is apparent that none have been done. The Presenters highlighted the lighting and the safety it would provide to the users, particularly during periods of the year when it is dark during the normal commuting times. Again FCDOT needs to provide the information on the number of commuters projected to use this pathway and lock their bicycles at the Metro, and demonstrate that this number justifies cost and the environmental impacts from the Project.

7. What outreach has been conducted for the Project other than the May 10 Public Meeting? According to the VDOT Project Schedule and Program Data Report for Northern Virginia, preliminary engineering was initiated in 2014, and the Environmental Review Process was initiated in August 2017. Was there public outreach before now and if so who was included in this outreach? If there was no outreach until now how could FCDOT possibly ascertain whether there was any controversy over the project?

As a citizen and resident of the area, and as someone who is interested in the preservation of what little woodland habitat that remains and the importance of woodlands in protecting our surface water resources, and our wildlife resources to the benefit of all of the residents of the county I am appalled by the failure of the very limited information available to the public to demonstrate the need and benefits that would result from this Project given the price tag. Nor is there any information available to allow us as citizens to assess the direct and indirect impacts to the environment from this Project. I would ask that FCDOT consider these comments, provide the information requested, and conduct appropriate outreach to the community and watershed groups such as Friends of Accotink Creek.

Sincerely,  
Primary Conservator Friends of Accotink Creek