



Joint Comments Regarding Cinder Bed Road Bikeway

AUDUBON NATURALIST SOCIETY • SIERRA CLUB GREAT FALLS GROUP • AUDUBON SOCIETY OF NORTHERN VIRGINIA • FRIENDS OF ACCOTINK CREEK • VIRGINIA NATIVE PLANT SOCIETY, POTOWMACK CHAPTER • FAITH ALLIANCE FOR CLIMATE SOLUTIONS

July 11, 2022

Via email Rodney.Lusk@fairfaxcounty.gov

The Honorable Rodney Lusk
Franconia District Supervisor
Franconia Governmental Center
6121 Franconia Road
Alexandria VA 22310

Dear Supervisor Lusk,

We are writing to reiterate our deep concerns and continued opposition to completion of the Cinder Bed Road Bikeway through the Newington Conservation Site.

We appreciate your willingness to host a site visit on February 16, 2022 and your engagement with county staff on the details of the project’s impact on natural resources. As we continue to learn more about the project, our concerns have only deepened.

We ask that:

1. Segment 6 not be built.
2. Any construction provides proper avoidance and mitigation of harm to environmental resources.

Our March 14, 2022 letter¹ discussed how a streamlined process, with inadequate environmental review and public input, led to an expensive and harmful decision to build a bikeway through the rare habitat of the Newington Conservation Site.

We ask you and your colleagues on the Board of Supervisors to review and correct the problematic process that brought us to this point and to rescind the county’s plan to build Segment 6 of the Bikeway through the Newington Conservation Site.

¹ March 14, 2022 letter:

<https://conservationblog.anshome.org/wp-content/uploads/2022/06/2022-03-14-Cinder-Bed-NEPA-concerns.pdf>

We outline a comprehensive plan below that invests in what we already have today, avoids environmental impacts to our most valuable habitat, and will save money.

1) Do not build Segment 6 of the Cinder Bed Road Bikeway

The Newington Conservation Site holds exceptional ecological value

Not all habitats are equal. As described by the Virginia Department of Conservation and Recreation (DCR), this forested stream valley contains habitat of rare quality and may shelter rare and threatened species. This area includes distinctive Coastal Plain/Piedmont Acidic Seepage Bogs, and globally rare Magnolia Bogs on the west side of Long Branch. Both types of habitat are located in the Fall Zone, and depend on drainage through glacially deposited gravel terraces first documented in 1918.²

Other Acidic Seepage Swamps occur in only a few dozen places in northern Virginia. Magnolia bogs are even rarer. One place these habitats are found is Barcroft Park in Arlington. The words of Gary Fleming (Plant Ecologist, Division of Natural Heritage) about Barcroft Park³ apply as well to the Newington Conservation Site, to be bisected and disturbed by Segment 6: “Because both of the wetland communities at Barcroft Park are rare, small-patch types, their persistence in the heavily urbanized DC area is extraordinarily significant. The terrace gravel bog, in particular, has great ecological significance as one of the few remaining sites in the world for this community.” (Emphases added.) Arlington chose to protect and preserve its rare habitat; Fairfax County should do the same.

Segment 6 will cause irreparable environmental damage

As planned, Segment 6⁴ would bisect the Newington Conservation Site and threaten the hydrology and rare plant communities of the habitat described above. Artificial nighttime lighting of the proposed path would also negatively impact wildlife (further detail is provided in greater detail in the mitigation section, below). And yet VDOT allowed this project to qualify for a categorical exclusion from the requirement to prepare an Environmental Assessment or Environmental Impact Statement and did not consider alternative connections.

² <https://www.dcr.virginia.gov/natural-heritage/natural-communities/ncpc4>

³ November 18, 2003 letter from Gary Fleming:

https://drive.google.com/file/d/1SzSdvG32fsBV9wT_05QwuKrKQrKp8vX0/view?usp=sharing

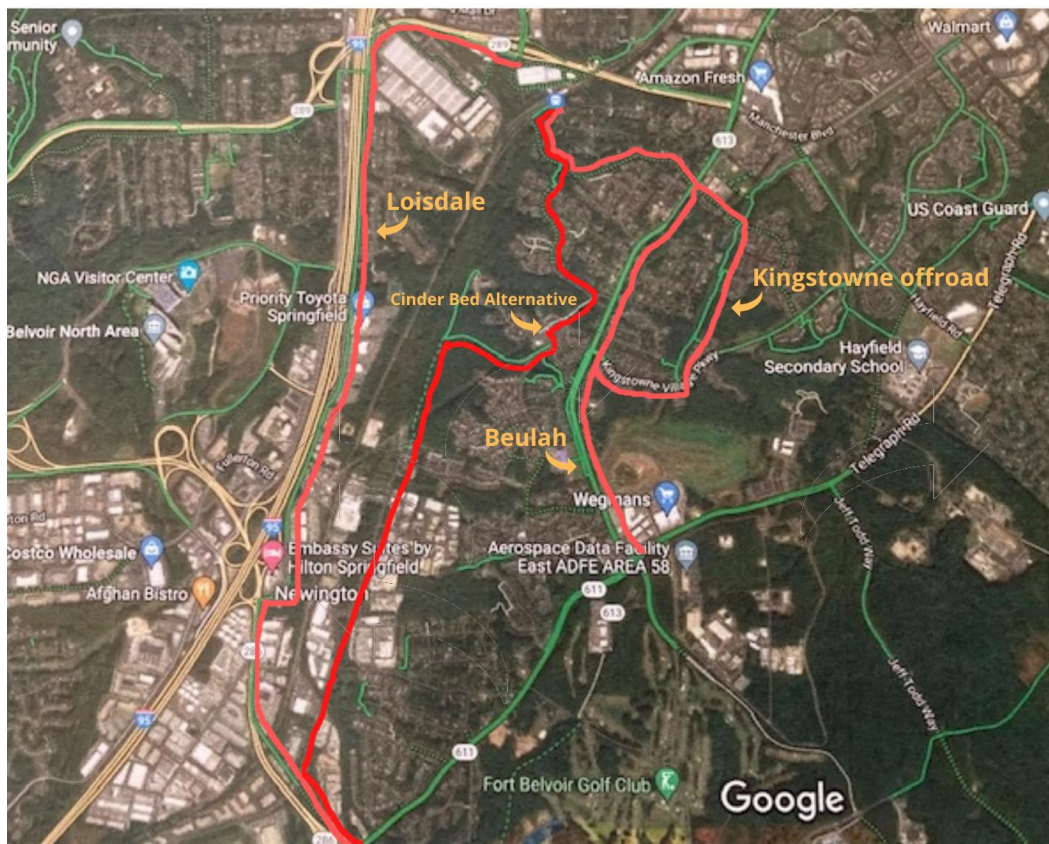
⁴ Segment 6 as noted in the Cinder Bed Final Report:

https://www.fairfaxcounty.gov/transportation/sites/transportation/files/assets/documents/pdf/transportation%20projects,%20studies%20and%20plans/cinder%20bed%20road/cinder-bed-road-bikeway_final-report.pdf#page=5

Several safe alternatives to Segment 6 exist today

FCDOT's analysis of alternatives was inadequate. Real, workable alternatives to Segment 6 exist today, shown on the Fairfax County Bike Map⁵, yet no studies were undertaken to determine the level and patterns of use of the existing Metro access trails documented below, nor to assess the need for yet another north/south route. Improving existing alternatives could require coordination with VDOT, but would provide safe transportation for bikers and protect rare habitats at a fraction of the cost.

Four cycling and pedestrian options that exist today as well as a bus route, are described below.



The base map above is courtesy of Google's "Biking" map which indicates cycling routes in green. Routes marked in red are currently available alternatives described in detail below.

5

https://www.fairfaxcounty.gov/transportation/sites/transportation/files/assets/documents/pdf/bikeprogram/fairfax_bikemap_english_web-508-front.pdf

Current connections between the Newington Road area and Franconia-Springfield Metro

Two current north/south facilities originate in the Newington Road area and terminate at the Franconia-Springfield Metro.

- **Cinder Bed Alternative (bikeway and connector paths)**

Where Cinder Bed Road terminates at the northern end, an existing 8-foot wide paved path through the woods allows a safe, off-road connection to the path that connects up to Island Creek at Morning View Lane. From here, cyclists can quickly, safely, and easily navigate to the Fairfax County Park Authority 8-to-10-foot wide paved, lit trail in Amberleigh Park, connecting Thomas Grant Drive with Crestleigh Way. From Crestleigh Way, cyclists can safely make their way to the current paved Barry Road connection and down to the metro.

This route has curb cuts allowing easy transition for cyclists but would benefit from clearer signage at key decision points.

- **Loisdale Road**

Because of the good work done by transportation planners in the past, a multi-use trail east of I-95 connects both Fort Belvoir North and the Fairfax County Parkway to the Metro. This route is flat, well-marked, and was built as a commuter route.

Like any transportation facility under VDOT's jurisdiction, maintenance is imperative to ensure that it is usable. It is degraded, and investments here would drastically improve the route: Weeds should be managed, and native trees should be planted to create shade for trail users and increase the net environmental benefit of this corridor.

The single-lane road under the railroad bridge on Newington Road is dangerous. Improvements must be made to ensure safe passage, such as installing a signal.

Current connection between Fort Belvoir and Franconia-Springfield Metro

The Cinder Bed Road Bikeway final report states that it would provide bicycle access from Fort Belvoir to the metro. However, the proposed route to and from Fort Belvoir would be circuitous, at best.

Several other options would prove to be just as or more effective and direct for commuters. Here are three such:

- **Beulah Road**

This primary road provides straightforward connectivity for cyclists between Fort Belvoir and the metro. While there are bike lanes in both directions, they are unprotected. This stretch of road does provide a sidewalk and multi-use trails are provided in areas more recently developed in the southern part of the connection, such as near Wegmans.

With improvements, such as protected bike lanes or a separate cycle track, the safety

and usability for cyclists could be dramatically improved.

- **Kingstowne off-road (east of Beulah)**

For cyclists uncomfortable traveling on the unprotected bike lanes on Beulah, a currently existing paved, off-road multi-use trail mirrors Segment 6's alignment on the east of Beulah between Kingstowne Village Parkway and Kingstowne Commons Drive along a powerline easement. Cyclists can easily access this trail on a direct route from Metro via Barry Road / Windsor Drive, allowing them to avoid the stretch of Beulah labeled as "less comfortable" on the Fairfax County Bike Map.

- **Direct bus service**

While not specifically providing *bicycle* access to Fort Belvoir, the Fairfax Connector Bus "The Eagle" provides a safer, faster commuter alternative to driving weekdays from Fort Belvoir to Springfield Metro.⁶

Environmental and financial costs are much higher than anticipated

Would you please share with us a current financial breakdown of the project, especially the costs to construct Segment 6?

This redundant bikeway is incredibly expensive. What began as a \$4,000,000 project now approaches \$15,000,000, a shocking 275% increase. We are aware that state and county transportation funds have been reprogrammed from other projects to cover cost overruns⁷.

During the planning stages, a 2013 benefit/cost comparison for this project gave it a score of .7, which is below 1, indicating it would take more than 20 years for benefits to exceed costs. Since then, the enormous cost increase has driven the score closer to zero, meaning its benefits may never justify its costs. FCDOT has not recalculated that benefit/cost comparison.

We question why this project is such a priority for the county, and why the county plans to continue to throw good money after bad on it.

2) Ensure Any Construction Properly Avoids and Mitigates Harm to Environmental Resources

FCDOT has proposed some steps to try to mitigate environmental impacts in Segment 6. One is to construct a very long bridge to avoid wetlands. This bridge was not part of the 2014 approved bicycle Master Plan. The lack of upfront environmental evaluation may explain the county's

⁶

https://www.fairfaxcounty.gov/connector/sites/connector/files/assets/documents/pdf/route%20pdfs/route_35_093017_web.pdf

⁷

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

failure to anticipate the need for bridges for this trail, which in turn accounts for some of the huge cost increase.

Second, the county plans to install French mattresses, gravel beds placed underneath the foundation of the trail. This should allow water to pass through with the goal of maintaining the hydrology upon which the rare habitats found in the Newington Conservation Site depend. However, French mattresses will only be installed near the bridge.

The trail and its construction will compact soil and obstruct water flow for the rest of its length, placing at risk the hydrology upon which the rare habitats of the Newington Conservation Site depend. The trail and its construction will bisect, disturb, and degrade what is now a unique, healthy habitat. It will create a vector for invasive plants. Even if FCDOT develops an invasive management plan – which they certainly should if the trail is built – the disturbance will inevitably lead to more invasives and degradation of the site.

In addition to avoiding Segment 6, we ask that this project take the following steps to mitigate impacts of the bikeway and its construction:

- **Minimize clearing, maximize restoration**

We ask that the areas of disturbance be minimized. This includes limiting the clearing of native vegetation to only what is necessary. In forested areas, we ask that no further clearing be done and that the existing 8-foot wide paths remain as they are today. We ask that FCDOT partner with Stormwater given the latter's extensive restoration experience and expertise, including oversight on plant materials, maintenance, and removal of invasives, and addressing hydrology during the build and stormwater runoff afterwards.

- **Long term monitoring of consequences**

Construction impacts, soil disturbance, and increased impervious surface degrade natural habitats in multiple ways, including by creating a vector for invasive plants to overwhelm the site. We ask the county to develop and implement a plan to monitor and treat invasive plants on an on-going basis. Erosion should be monitored over the long term as well. As storms increase in frequency and duration, the erosive effects of the added pavement will increase. Effects of nearby trail construction on the Acidic Seepage Swamp and Magnolia Bogs should also be monitored for unintended harms.

- **Avoid lighting in the natural areas**

The wooded sections of the Cinder Bed Road Bikeway should not be lit. Artificial nighttime lighting has well-documented negative impacts⁸ on birds, mammals,

⁸ Light Pollution Is Altering Plant and Animal Behaviour, <https://phys.org/news/2018-03-pollution-animal-behaviour.html>; Light Pollution Effects on Wildlife and Ecosystems, <https://www.darksky.org/light-pollution/wildlife/>; Light Pollution Can Harm Wildlife, https://darksky.org/wp-content/uploads/bsk-pdf-manager/Wildlife-Brochure-FINAL2_32.pdf ; Light Pollution Harms the Environment, <http://cescos.fau.edu/observatory/lightpol-environ.html>; The Vanishing Night: Light Pollution Threatens Ecosystems,

amphibians, reptiles, insects, and even plants. Lights would negatively affect the state-endangered tri-color bat and the state-threatened wood turtle, which may be present on the site⁹.

Avoiding lighting in wooded areas would also reduce long-term maintenance costs. Loisdale Road serves as a safe, already-lit route for those needing to travel after dark.

- **Minimize harms from winter maintenance**

We are concerned that FCDOT plans to plow the bikeway, but the bridges have not been built to withstand plowing. Applying salt to trail and/or bridges will further harm Long Branch and its wetlands. How will contamination from winter salt be avoided?

- **Additional comments on Segments 2-4 on Cinder Bed Road**

It is regrettable that the industrial character of Cinder Bed Road makes a bikeway here unsafe for cyclists. The planned section of the path west of Cinder Bed Road comes into conflict with the stream itself and its associated wetlands will have impacts on Long Branch, and will be at risk of flooding, further endangering cyclists. Ideally, a shared use path would be located on the east side of the street, where the existing sidewalk is today, preserving more of the riparian buffer and floodplain.

Two improvements would increase safety for cyclists at the various driveways: (1) raising the crosswalks at driveway entrances to serve as a traffic calming measure for cars and trucks and (2) narrow the driveway crossing widths as much as will allow truck traffic to safely make turns, to aid safe crossing and as a traffic calming measure.

Summary

We recognize that investing in maintaining current infrastructure lacks the cachet of a ribbon cutting or celebration of a new trail, but we must be better stewards of existing resources, including bike trails as well as natural resources. When it opened in 2002, the Loisdale Road bike trail was celebrated with the promise of maintenance. Twenty years later, it is overgrown with weeds and neglected.

We support:

- Increasing investments in maintenance and upgrades (such as planting trees, mowing, and improving signage) of existing trails.
- The proposal to upgrade the on-road bike lanes in Segment 2 to be protected bike lanes.

<https://www.the-scientist.com/features/the-vanishing-night--light-pollution-threatens-ecosystems-64803>; Animals Need the Dark, https://www.nps.gov/articles/nocturnal_earthnight.htm; Light Pollution Is Bad for Humans but May Be Even Worse for Animals, <https://theconversation.com/light-pollution-is-bad-for-humans-but-may-be-even-worse-for-animals-31144>; Artificial Light at Night Affects American Toad Metamorphosis and Growth, <https://www.darksky.org/artificial-light-at-night-affects-american-toad-metamorphosis-and-growth/>

⁹Page 2: https://drive.google.com/file/d/19_sAmam9cDgM93Z8ew6kWKupxzX43ltS/view?usp=sharing

- The proposal to remove the existing railroad spur bridge over Cinder Bed Road as the recommended preferred option to ensure a safer connection for pedestrians, cyclists, and cars alike.
- The proposed cycling facilities on Cinder Bed Road in Segments 3 and 4, with an eye towards minimizing environmental impacts, to allow cyclists a safer connection to the off-road trail that already exists.

We oppose:

- The widening, disturbance, and lighting of Segment 5.
- The building or lighting of Segment 6.

Thank you for your consideration. We look forward to continuing discussions of ways to improve the network of trails while protecting natural resources, and improvements in the process by which decisions about trails are made.

Sincerely,

Audubon Naturalist Society, Renee Grebe, Northern Virginia Conservation Advocate

Sierra Club Great Falls Group, Ann Bennett, Land Use, Climate, and Energy

Audubon Society of Northern Virginia, Betsy Martin, Director

Friends of Accotink Creek, Philip Latasa, Steward

Virginia Native Plant Society, Potowmack Chapter, Alan Ford, President

Faith Alliance for Climate Solutions, Andrea McGimsey, Executive Director

Cc:

Jeffrey McKay, Chair, Board of Supervisors

Penny Gross, Vice-Chair and Supervisor, Mason District

James Walkinshaw, Supervisor, Braddock District

John Foust, Supervisor, Dranesville District

Walter Alcorn, Supervisor, Hunter Mill District

Daniel Storck, Supervisor, Mount Vernon District

Dalia Palchik, Supervisor, Providence District

Pat Herry, Supervisor, Springfield District

Kathy Smith, Supervisor, Sully District

Tom Besiadny, Director, FCDOT

Jeff Fasceski, FCDOT Project Manager

Theresita Crockett-Augustine, US Army Corps of Engineers, Norfolk District, Northern Section

John Muse, Environmental Manager, CE Determination, VDOT

Rene Hypes, Natural Heritage Project Review Coordinator, DCR

The Honorable Don Beyer, U.S. House of Representatives.