RE: ActiveFairfax Comments of the Friends of Accotink Creek

- We support the "Enhanced Neighborhood Route" concept of the ActiveFairfax draft plan, avoiding environmental and financial expense by making use of existing infrastructure.
- The current draft plan leaves unclear whether lines through stream valleys are intended to be trails or wildlife corridors or what. Stream valleys are all floodplains and Resource Protection Areas that should be protected. Stream valley also represent some of the few options available for wildlife movement. That options should be enhanced, not disturbed.
- The Friends of Accotink Creek endorse the Northern Virginia Bird Alliance's Criteria for Trails, reproduced below.

#SaveCinderBedWoods

Northern Virginia Bird Alliance[1] Criteria for Constructing New Bicycle and Multi-use Trails and Substantially Expanding Existing Trails

The Northern Virginia Bird Alliance (NVBA) recognizes the general desirability of building new bicycle and multi-use trails and expanding existing trails to meet growing demand and to encourage reduced vehicular traffic. Such facilities are particularly important for the development of transit areas and walkable, bikeable communities. However, it is critical that any such trails be sited and designed to avoid damaging natural areas and the dwindling habitat for birds and other wildlife. Bird populations are declining mainly due to habitat loss from development and accompanying pollution. Non-native invasive plant species can be introduced during trail construction and expansion and as people use the trails. Stormwater runoff, particularly during construction, can cause irreparable damage to sensitive natural spaces.

To balance these goals, NVBA recommends that construction of new trails and expansion of existing trails meet the following criteria:

1. Maintain and map current trails. All too frequently, existing trails are not maintained properly, resulting in fewer people using them. This may be because funds to construct new trails are more readily available than funds to maintain existing trails. Decision-makers should ensure that existing trails are maintained and there are sufficient funds to maintain both existing and proposed trails before constructing new trails. They also should maintain current maps of trails so that the need for new trails can be evaluated in light of existing trails.

2. Route trails (especially those funded as transportation) away from natural habitat wherever possible. New multi-use and bicycle trails should be routed through already disturbed and degraded habitat, on not-too-busy streets, and within existing, disturbed rights-of-way along roadways to the maximum extent possible. Expansion of existing trails should be minimized in natural or park areas to ensure preservation of meadow and edge habitat that support resident and migrating bird species. Multi-use and bike trails should be designed to avoid undisturbed natural areas, and if other routes are infeasible, trail proposals should be evaluated carefully through transportation studies to determine whether they are really needed. If adequate routes are available on low-use roads or disturbed corridors, those routes should be adopted instead.

3. Minimize impacts on natural areas. When trails are planned through natural areas, which may include valuable meadow and edge habitat along utility rights-of-way, the plans should minimize

environmental impacts. Trail routing and construction should avoid cutting trees, disrupting water flows and breaking up continuous forest, wetland or meadow habitats. Re-grading slopes should be avoided since it would result in adding or removing soil, cutting trees and tree roots, and adding retaining walls, all of which degrade the environment. Where trees must be cut, plans should include provisions for planting two native trees for each removed tree and landscaping supportive of birds and other wildlife to create shaded trails that provide an enjoyable experience and improve environmental conditions. Trail managers should avoid the use of pesticides and herbicides except as necessary to control non-native invasive plants and should monitor, care for and replace as necessary new trees and landscaping for at least two years. Trails in wooded areas inevitably mean some root upheaval, which managers and users should learn to live with.

4. Include remediation plans for any trails through natural areas. Trails through natural areas disturb and create a vector for the spread of invasive plants to spread into natural areas and outcompete native plants. All planned trails in natural areas should be accompanied by a funded multi-year invasive management plan.

5. Do not plan new trails or trail expansions through sensitive natural areas without first assessing their environmental impacts and avoiding them to the extent possible, including considering alternative alignments. Alignments should avoid sensitive natural areas such as Resource Protection Areas, Environmental Quality corridors, wetlands and floodplains and not rely on mitigation attempts after a route has been chosen. Project managers should map and evaluate natural resource areas and conduct biological inventories of natural resources present, including any on state or federal endangered, threatened or rare species lists, before final decisions on trail alignment are made.

6. Minimize lighting on trails through natural areas. Lights generally should not be installed on trails through natural areas. The lights harm animals, including insects and birds, and disrupt the growth and flowering of trees and plants. If lights must be installed, they should meet DarkSky International's five principles for outdoor lighting standards: low-intensity, low color temperature, shielded, and either motion-activated or on timers so they turn off two hours after sunset. The lights also should be compliant with DarkSky International's Values-Centered Outdoor Lighting Principles, which include lighting with a CCT of 2200K wherever possible and 0% blue light in sensitive areas.[2] When higher than 2200K CCT is necessary to meet lighting objectives, the total emission of blue light into the environment should be kept as low as reasonably possible through low intensities, careful targeting, and reduced operating times. Planners should use pathway lighting instead of overhead lighting and should consider luminescent products instead of lights where feasible. Lighting should be designed in consultation with experts experienced in dark sky lighting projects.

7. Require transparency and public participation in trail planning. Public participation at every stage is critical to ensure all constituencies are represented in the planning process. Planners should specifically seek input from environmental organizations such as NVBA, that are sensitive to potential impacts on natural resources, including birds and wildlife, as well as advocates for biking paths.

8. Consider all users in planning predictions, modeling and designs. Trail planners should give significant weight to the various purposes for trails, including transportation, recreation, nature study, scientific research, nature walks, natural resources surveys and other scientific, resource-based activities. Trail managers should conduct periodic speed studies of bicyclists and other non-pedestrian users to ensure that all users have a safe experience on the trail.

1 NVBA was formerly known as Audubon Society of Northern Virginia.
2 https://darksky.org/resources/guides-and-how-tos/values-centered-outdoor-lighting/