BRADDOCK ROAD MULTIMODAL - VDOT CE and Section 4(f) Summary 9/15/2026

ANALYSIS AND SUGGESTED COMMENTS,
COURTESY OF BRADDOCK ROAD NEIGHBORS

1. Summary of the Two Public Review Documents

Categorical Exclusion (CE) Document:

- **What it is:** A federal environmental review claiming that the overall project is routine and will **not** cause significant environmental harm under the National Environmental Policy Act (NEPA)
- **Significance:** By using a "blanket" Categorical Exclusion, VDOT avoids doing a full, in-depth Environmental Assessment (EA) or Environmental Impact Statement (EIS) for the corridor
- **Public Comment Deadline: ~~September 21, 2026~~ extended to September 30, 2026**

Draft Individual Section 4(f) Evaluation:

- **What it is:** A specific federal legal evaluation required whenever a transportation project proposes taking or using land from public parks
- **Significance:** VDOT was forced to prepare this document because the project carves into **four Fairfax County parks** (Canterbury Woods, Howrey Field, Accotink Stream Valley, and Wakefield Parks)
- **Public Comment Deadline: October 19, 2026**

2. Key Issues Relevant & Neighborhood Interests

Inappropriate "Blanket" Environmental Clearance:

- VDOT is classifying a massive project—requiring **13.95 acres of new right-of-way clearing ~17 acres of mature tree canopy** and requiring a **U.S. Army Corps of Engineers Individual Permit** —as a minor "Categorical Exclusion." This bypasses rigorous analysis of neighborhood and ecosystem damage

Parkland Loss & FCPA Objections:

- The Fairfax County Park Authority (FCPA) repeatedly **refused to sign off** on VDOT's claim that park impacts were minor ("*de minimis*") due to unmitigated environmental damage and missing plan details
- VDOT explicitly rejected key FCPA mitigation requests, including performing a tree preservation plan or compensating for lost natural resources

Stormwater Runoff & Deforestation:

- Removing 17 acres of mature trees along stream valleys (such as Long Branch and Accotink Creek) risks increasing neighborhood stormwater runoff and localized flooding—a direct concern for oversight of stormwater regulation
- The project footprint threatens rare, sensitive natural communities, such as the *Northern Piedmont Small-Stream Floodplain Forest* in Wakefield Park

Flawed Traffic Data & High Cost vs. Low Benefit:

- The project relies on **2015 traffic counts** projected forward, ignoring post-pandemic telework realities and current commuting patterns
- Roughly half of the project footprint goes toward constructing oversized 10-foot-wide shared-use paths (SUPs) with 10-foot grass buffers on **both sides** of Braddock Road This duplicates existing local neighborhood sidewalks and trail networks at a heavy cost to the tree canopy and park boundaries

Illegal Project "Segmentation":

- VDOT is seeking environmental clearance for the entire corridor while splitting construction into two phases—with **Phase 2 currently unfunded** Furthermore, VDOT explicitly declined to evaluate cumulative environmental impacts

---

BRADDOCK ROAD MULTIMODAL IMPROVEMENTS

SAMPLE CATEGORICAL EXCLUSION PUBLIC COMMENT

Please feel free to adapt it to your community's circumstances and concerns, or use it as background for your own comments.

COMMENT DEADLINE: **SEPTEMBER 30, 2026**

SUGGESTED PUBLIC COMMENT

Subject: Formal Comment on Draft Categorical Exclusion – Braddock Road Multimodal Improvements, UPC 114627/119477

Steve Varner
Virginia Department of Transportation
4975 Alliance Drive
Fairfax, VA 22030
Steven.Varner@vdot.virginia.gov

Dear Mr. Varner:

This comment addresses the Draft Categorical Exclusion for the Braddock Road Multimodal Improvements project, UPC 114627/119477.

VDOT and FHWA should not finalize the Categorical Exclusion (CE) until the agencies have demonstrated, through a sufficiently complete and publicly reviewable environmental analysis, that the project will not result in significant effects on the human or natural environment.

The project's scope and acknowledged impacts warrant careful scrutiny.

The project extends approximately three miles along a heavily developed transportation corridor. It includes substantial roadway and intersection modifications, bridge work, new and upgraded shared-use paths, stormwater infrastructure, utility work, and right-of-way and

easement acquisitions. VDOT currently estimates the total project cost at approximately $189.1 million.

More importantly, VDOT's own Draft CE identifies environmental impacts that deserve rigorous consideration before FHWA concludes that a CE represents the appropriate level of NEPA review.

Among other things, the CE identifies:
• Approximately 589 linear feet of impacts to Waters of the United States;
• Approximately 0.42 acre of impacts to non-tidal wetlands;
• Potential impacts to Accotink Creek, Long Branch, and a tributary to Accotink Creek;
• Widening of bridges over Long Branch and Accotink Creek;
• Stormwater impacts to intermittent stream channels;
• Approximately 13.95 acres of right-of-way and easement requirements;
• Use of federally protected Section 4(f) park properties, including Accotink Stream Valley Park, Wakefield Park, Howrey Field Park, and Canterbury Woods Park; and
• Potential impacts involving the Gerry Connolly Cross County Trail and connecting trails.

These are not hypothetical impacts. VDOT identifies them in the environmental document itself.

NEED FOR SHARED-USE FACILITIES ON BOTH SIDES OF BRADDOCK ROAD

The Draft CE also contemplates 10-foot-wide walk/bike lanes or shared-use paths on both sides of Braddock Road. Impacted residents have previously questioned the need for facilities on both sides of the roadway, particularly the proposed facility along the south side of Braddock Road.

Simply put, the projected pedestrian and bicycle usage does not appear to justify constructing two parallel facilities capable of accommodating substantially greater demand. If a single continuous shared-use facility can reasonably and safely accommodate the projected bicycle and pedestrian volumes, VDOT should explain why a second 10-foot facility constitutes a necessary element of the project rather than an avoidable source of environmental disturbance.

That question becomes especially important along the south side of Braddock Road adjacent to Kings Park. Construction there could require substantial clearing of mature trees and significant soil disturbance along the steep slope between the homes and Braddock Road. Those impacts may include grading, erosion, altered drainage, retaining structures, construction access, and permanent loss and fragmentation of mature tree canopy.

VDOT should therefore evaluate whether eliminating the south-side shared-use facility, or substantially reducing its extent, could meet the project's reasonably anticipated pedestrian and bicycle demand while avoiding or materially reducing these environmental impacts.

The environmental analysis should not begin with the assumption that identical or parallel multimodal facilities on both sides of Braddock Road are necessary and then merely calculate the impacts of constructing them. It should demonstrate that anticipated demand reasonably requires those facilities and examine whether a less environmentally damaging configuration could accomplish the same transportation purpose.

Accordingly, the environmental record should identify the projected pedestrian and bicycle volumes upon which the proposed facilities are based, the anticipated capacity and utilization of

the proposed shared-use facilities, and the basis for determining that facilities on both sides of Braddock Road are necessary. It should also compare those transportation benefits with the environmental impacts that eliminating or reducing the south-side facility could avoid.

ACCOTINK CREEK WATERSHED AND STORMWATER IMPACTS

Of particular concern, the Draft CE acknowledges that the project lies primarily within the Accotink Creek watershed. That watershed already experiences substantial stormwater, erosion, stream-bank degradation, sediment transport, and downstream sedimentation problems.

The CE states that construction-related stormwater flows will be detained and treated through best management practices before entering Accotink Creek. That statement raises an important question that the environmental record should answer clearly:
Will the proposed stormwater management measures maintain or improve existing downstream hydrologic conditions, including peak discharge, runoff volume, erosive energy, sediment transport, and channel stability, rather than merely satisfy minimum regulatory requirements?

For a project of this scale within the Accotink Creek watershed, compliance with minimum stormwater requirements should not substitute for an evaluation of the project's reasonably foreseeable downstream consequences.

EROSION AND SEDIMENT CONTROL

This concern extends beyond designing permanent stormwater facilities to controlling erosion and sediment during construction.

Fairfax County and the Commonwealth impose substantial erosion, sediment, and stormwater management requirements on land-disturbing activities. Clearing mature vegetation, grading slopes, excavating soil, constructing transportation facilities, establishing staging areas, and altering drainage create precisely the conditions these requirements are intended to control. VDOT, Fairfax County, and contractors working under their authority must comply fully with applicable erosion, sediment, and stormwater requirements.

For this project, however, minimum regulatory compliance should represent the floor, not the objective.

The Braddock Road project lies primarily within the already environmentally stressed Accotink Creek watershed. Construction practices should therefore incorporate erosion and sediment controls that exceed minimum requirements wherever reasonably practicable. Those controls should include rigorous sequencing of land disturbance, minimizing exposed soil, preserving existing vegetation and mature tree canopy wherever possible, rapidly stabilizing disturbed areas, effectively containing sediment, inspecting frequently, promptly correcting failed or inadequate controls, and implementing enhanced measures before and after significant precipitation events.

There is an important historical basis for requiring this heightened level of protection.
During the period in which the original I-495 Express Lanes project was under construction, EPA conducted a statewide inspection of VDOT's stormwater program and construction sites. EPA subsequently documented widespread Clean Water Act violations involving VDOT's municipal

and construction stormwater permits. EPA specifically found that VDOT had not consistently maintained required erosion and sediment controls at construction sites and had failed to record all required inspections.

The resulting federal enforcement agreements required VDOT to implement corrective measures, develop and execute a statewide plan intended to prevent future violations, undertake $600,000 in environmental projects, and pay a $36,000 civil penalty.

The Accotink watershed experienced the consequences of inadequate sediment control during this same period. Friends of Accotink Creek documented substantial sediment releases associated with I-495 HOT Lanes construction and reported inadequate and poorly maintained erosion controls during the project. Subsequent documentation concerning Lake Accotink has specifically identified the I-495 HOT Lanes construction as a contributor to sedimentation reaching Accotink Creek and ultimately Lake Accotink.

That history is directly relevant to the Braddock Road environmental review. The environmental consequences of sediment released during major transportation construction do not end when construction ends. Sediment deposited in streams, floodplains, and downstream impoundments can remain part of the watershed's environmental burden long after the construction activity that generated it has ceased.

Lake Accotink continues to suffer from extraordinary sediment accumulation, and the substantial costs and difficult choices associated with addressing that accumulation remain unresolved. The Braddock Road project should not add another avoidable sediment burden to the same watershed.

VDOT should therefore do more than demonstrate that an erosion and sediment control plan meets applicable minimum requirements on paper. The environmental record should establish how VDOT will prevent construction-generated sediment from leaving disturbed areas, how controls will be monitored for actual field performance, how inspections will be documented, what corrective actions will occur when controls prove inadequate, and how those requirements will be enforced upon every contractor and subcontractor working on the project.

The history of the I-495 Express Lanes construction demonstrates why those assurances matter. The Accotink Creek watershed should not bear another avoidable sediment burden from a major public transportation project. Its existing condition warrants a higher degree of protection, monitoring, accountability, and construction oversight.

INFORMATION THAT SHOULD BE INCLUDED IN THE ENVIRONMENTAL RECORD

Accordingly, VDOT/FHWA should specifically document:
1. Existing and post-construction runoff volumes and peak discharge rates for the portions of the project draining to the Accotink Creek watershed;
2. The expected effects of the project on stream erosion and sediment transport within Accotink Creek and its tributaries;
3. The assumptions and modeling supporting the conclusion that proposed stormwater facilities will prevent adverse downstream effects;
4. The location, type, capacity, and design criteria for proposed stormwater BMPs;

5. The expected cumulative change in impervious surface associated with the project;
6. How the project will avoid contributing additional sediment loading to downstream Accotink Creek and Lake Accotink;
7. The reasonably foreseeable effects associated with construction, bridge widening, stream crossings, wetland disturbance, clearing, grading, tree removal, slope disturbance, shared-use-path construction, and permanent changes to drainage;
8. The projected pedestrian and bicycle demand for the proposed shared-use facilities and the basis for determining that facilities on both sides of Braddock Road are necessary;
9. The environmental impacts that could be avoided by eliminating or reducing the south-side shared-use facility;
10. The specific erosion and sediment control measures that will protect Accotink Creek and its tributaries during each phase of construction, including monitoring, inspection, maintenance, enforcement, and corrective-action procedures; and
11. The basis for concluding that these impacts, considered together, do not present circumstances warranting environmental review beyond a CE.

PUBLIC NOTICE AND OPPORTUNITY FOR REVIEW

These environmental documents contain information materially different from the ordinary design information presented during earlier public meetings. Residents cannot reasonably be expected to understand that earlier participation in project-design meetings substitutes for an opportunity to evaluate the subsequent NEPA determination.

The importance of meaningful public participation becomes even greater when the environmental document itself states that there is no "substantial controversy on environmental grounds." The absence of previously recorded environmental controversy cannot establish the absence of legitimate environmental concerns when the public has only recently received the environmental analysis upon which that conclusion rests.

Accordingly, VDOT and FHWA should:
• Give substantive consideration and written responses to environmental issues raised during this comment period;
• Extend or reopen the CE comment period if necessary to provide meaningful community review;
• Make the technical analyses supporting the CE's stormwater, hydrology, wetlands, stream, tree-canopy, slope-stability, erosion/sediment-control, and environmental conclusions readily available to the public;
• Coordinate specifically with Fairfax County regarding the relationship between this project and existing Accotink Creek watershed management and Lake Accotink planning; and
• Reconsider whether a CE remains appropriate if further analysis identifies potentially significant environmental effects or substantial unresolved questions regarding those effects.

CONCLUSION

Transportation improvements that increase safety and provide effective multimodal access along Braddock Road deserve support. Those objectives, however, do not require the public to

accept an inadequately demonstrated environmental conclusion or environmental disturbance that exceeds what the project's reasonably anticipated transportation demand requires.

The question before VDOT and FHWA is not whether the Braddock Road project provides transportation benefits. The question is whether the available environmental record adequately demonstrates that a project of this scope, in this location, with these acknowledged impacts, will not significantly affect the human or natural environment.

Before finalizing the CE, VDOT and FHWA should make that demonstration clearly, transparently, and on the basis of an environmental record that the affected public has had a meaningful opportunity to examine.

Please include this correspondence in the official administrative record for the Braddock Road Multimodal Improvements CE.

Respectfully,
[NAME]
[COMMUNITY/CIVIC ASSOCIATION, IF APPLICABLE]
[ADDRESS OR COMMUNITY]
Fairfax County, Virginia

REFERENCE INFORMATION
VDOT Braddock Road Multimodal Improvements:
https://www.vdot.virginia.gov/projects/northern-virginia-district/braddock-road-multimodal-improvements-in-fairfax-county/
U.S. Environmental Protection Agency – Virginia Agency Agrees to Stormwater Controls:
https://www.epa.gov/va/virginia-agency-agrees-stormwater-controls
Virginia Erosion and Stormwater Management Regulations:
https://law.lis.virginia.gov/admincode/title9/agency25/chapter875/
Fairfax County Erosion and Stormwater Management:
https://www.fairfaxcounty.gov/landdevelopment/erosion-and-stormwater-management