

Comments of the Friends of Accotink Creek on the Cinder Bed Road Bikeway:

To: Members of the Board of Supervisors and Fairfax County Department of Transportation. March 23, 2021

In this case of a choice between two worthy goals – enhanced non-motorized transportation and habitat preservation – we appeal for reconsideration on behalf of preservation of our finite and dwindling wooded natural areas.

Pardon the long-windedness of these comments, but this issue just demands a much more reflective scrutiny than it seems to be receiving.

Improved opportunities for bicycle and pedestrian travel are welcome, but the proposed route means this opportunity would come at the expense of forests and streams. Fairfax County has thousands of miles of streets that need to be made people-friendly first!

Our planet is on fire. Why are we replacing carbon sink trees with heat sink asphalt? Why are we introducing light pollution into the forest? Does wildlife not have enough stress already? Citizens already pay taxes to have our streets paved and lighted and plowed of snow; let's use them!

This is an area where no trail exists, entirely within the floodplain, part of which harbors rare Magnolia Bog habitat. The Friends of Accotink Creek question the need for such a trail and the wisdom of applying resources to its construction that could better be used to enhance the health of our streams and watersheds.

Our stream valleys are already fragmented, already crisscrossed by power lines and sewer lines and gas lines, are already asked to sacrifice for every road widening proposal and parking lot expansion that comes along. The limits of sacrifice have been reached.

Other County plans need to be fulfilled, too, such as the Chesapeake Bay Preservation Ordinance, the Accotink Creek Watershed Plan, or the Fairfax County Tree Plan. All these plans sanguinely assure the preservation of trees and streams while other County, Commonwealth, and private interests continue to clear them away. Why should the environmental preservation mandates of these other plans not take priority?

One such County plan is the Community-wide Energy and Climate Action Plan, or <u>CECAP</u>. Projects of this nature raise the concern that we may fail to protect and preserve the very green infrastructure that is already serving CECAP's goals of storing carbon and mitigating heat island effects. Protections for these places should be built in at the County level so that natural resources are taken into direct consideration as a component of mitigating climate change.

The demand for active recreational use of parks is infinite, but our remaining natural areas are finite. Now is a good time to put value on those things we are losing in our quest for pavement everywhere.

Streets were built where transportation is needed. Stream valleys were not. Ergo paving stream valleys is not a solution to transportation needs. Admittedly, in this case the route does lead to Metro, but viable alternatives are readily at hand.

The space between Cinder Bed Road and Long Branch is very narrow. Adding the bikeway to this space will further reduce this limited riparian buffer, so necessary to maintain the health of our streams.

Explanations offered by FCDOT of seeking a direct route to transit ring hollow. If the stream valley were curved, we might expect the project would still follow it because trees cannot complain or vote – the path of least resistance. Additionally, why not simply change the arbitrary starting point to achieve a straighter line on streets?

The deviation from a direct line of the proposed route at its northern end, requiring two crossings of Long Branch and it associated wetlands seems precisely designed to prioritize avoiding impact to private parcels over avoiding environmental impacts. This greatly diminishes the justification of providing a direct route.

At the May 10th public meeting, suggestions of an alternate solution of improving the existing on-street route were brushed aside with assertions of impracticality. Yet how we may ask, are the users to reach the Bikeway, if not on the very streets which FCDOT dismisses as unsuitable for bike travel? After all, those existing streets and trails are at present designated and signed as a pedestrian route to Metro and will continue to be so used by all neighbors not immediately adjacent to the proposed Bikeway route. Let's build on what we've got.

Seepage wetlands were mentioned by presenters at the May 10th public meeting, but not shown on slides. This seemed to reflect the view of the presenters of wetlands as an obstacle in the way of pavement, not a treasured natural resource. Nor had the presenters heard of the rare Magnolia bog habitat present.

A portion of these wetlands consist of Coastal Plain/Outer Piedmont Acidic Seepage Swamp, a globally rare wetland type which cannot be replaced, making mitigation using acres for acres meaningless.

Nor were the May 10th presenters aware of the unfortunate illegal trash dumps in the area – surprising, given their easy visibility. The casual suggestion that it was the responsibility of volunteers to remove the trash was disappointing, to say the least.

Even more troubling than the paving of the woods is that the entire route is to be lighted. At the May 10^{th} public meeting, the presenters frankly admitted they hadn't given a thought to the adverse effect of lighting on wildlife. The <u>negative impact on wildlife of artificial lighting</u> is well known and should rule against any new lighting in habitat areas. The presenters did mention downward-facing lighting, indicating some awareness of dark sky issues.

At the same time as this project advances, we are planning to extend and widen Frontier Drive to "relieve congestion". The Frontier Drive project will also negatively impact the northern end of Long Branch while the Bikeway cut a swath in the south. The cumulative effect of projects must be considered. These impacts do not occur in isolation.

The plan to extend and widen Frontier Drive is proposed to "relieve congestion". Will that be the future solution if the Bikeway is a success – widen it again and again, sacrificing more and more forest each time to "relieve congestion"? No, the forest has already sacrificed enough for human convenience. It is our turn to give.

On a financial note, as laymen we find the \$14,750,000 price tag for two miles of bike trail to be extraordinary, and far in excess of standard <u>online standard estimates</u> for road construction. It would seem simple fiscal prudence would lead us to upgrade the existing trail-and-street route to Metro at far lower initial and ongoing cost.

On a note of environmental accounting, have we really done a carbon reduction accounting of the project that tells us the gain in car-miles saved outweighs the carbon cost of construction, construction materials, maintenance, lighting, and loss of carbon-sink trees?

There is presently one bike rack at the end of the existing on-street route. According to the May 10th presentation, this will be increased to two racks. The total capacity of the two bike racks would then be about 40 bikes. Is this indicative of how little usage is truly expected?

One of the presenters at the May 10th public meeting urged citizens to complete the Active Fairfax online survey . This graphic found on the Active Fairfax website illustrates the compelling alternative that this project overlooks – make our streets safe for people, rather than make our woods safe for pavement.



There is no limit to human demands. Nor, it seems, is there any limit to our population growth locally. Finite Nature cannot expand to meet our demands. We must preserve what we have or lose anything worth preserving. Let's make our streets "Complete Streets" and leave our remaining forests intact.

Some questions:

- What surveys have been done to determine the presence of the northern long-eared bat or the tri-colored bat, whether roosting or transitory? Absence of a study does not equal absence of the species.
- What surveys have been done to determine the presence of other bats, their prey species, their predator species, or indeed any wildlife, terrestrial or aquatic, likely to be disturbed by the addition of artificial lighting?
- What studies of projected volume of non-motorized use exist to justify the construction of the Bikeway?
- What studies indicate the points of origin of the presumed commuter users of the Bikeway?
- The project received funding from the Federal Transportation Alternatives Program. What studies were presented in support of the application?
- What studies have been done to justify expectations of a net carbon emissions reduction after all considerations of construction, maintenance and tree loss are factored in?
- Under which Programmatic Categorical Exclusion category does this project claim exemption from full federal environmental studies?

Primum non nocere - "First, do no harm." Doing nothing is an option in our remaining natural habitats.

And may we appeal yet again for public interest groups, including watershed stewardship groups, to be included in public notifications for County projects?

Sincerely,

Philip Latasa: : steward@accotink.org

Friends of Accotink Creek:: www.accotink.org::

"Of all the paths you take in life, make sure some of them are dirt." - John Muir