

Comments for EQAC: Concerns about Trail Planning Process

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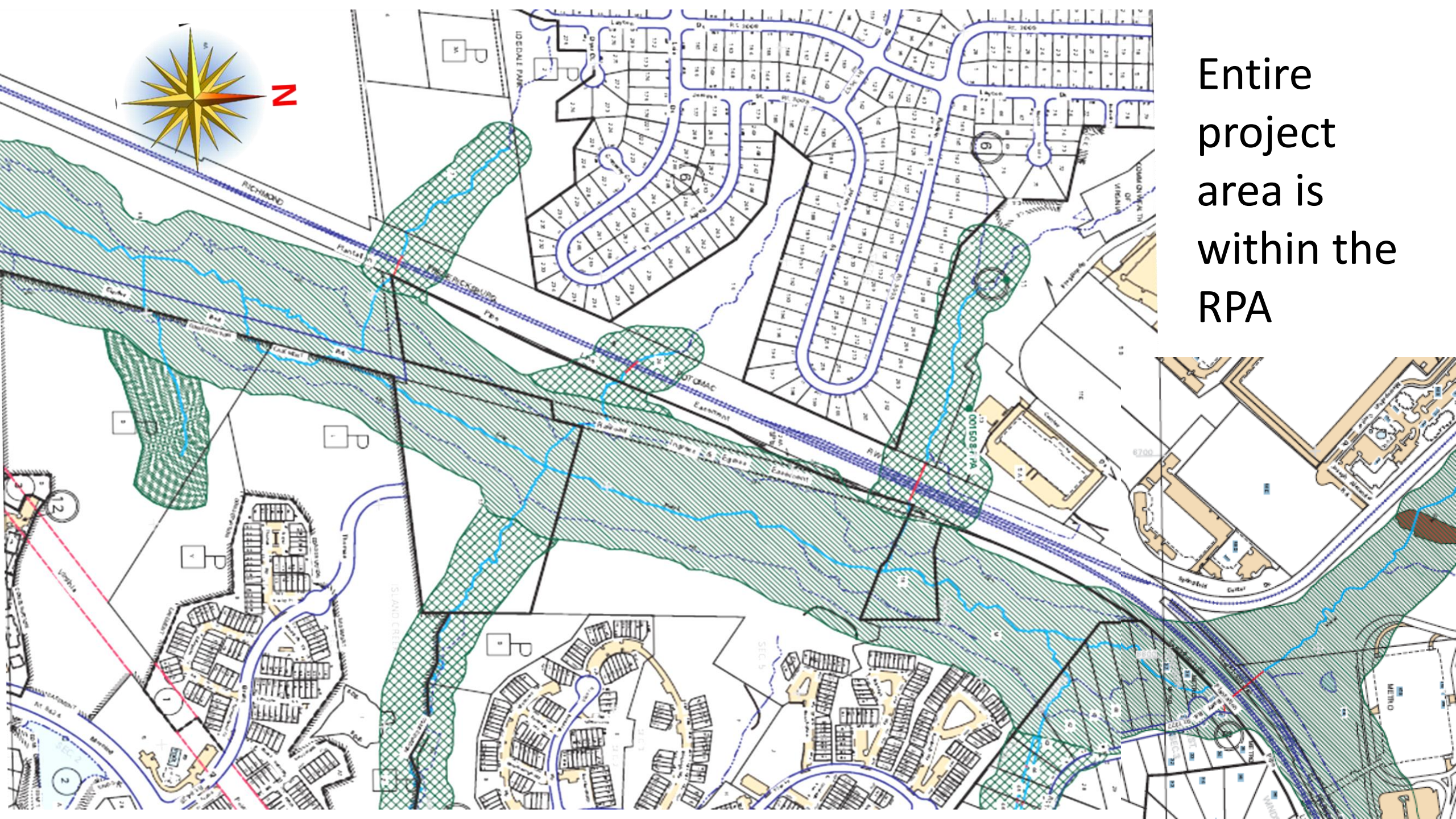
Audubon Society of Northern Virginia

Proposed Cinder Bed Road Bikeway



Cinder Bed Road Bikeway

- Purpose: provide a bicycle commuting route from Fort Belvoir to Franconia/Springfield Metro.
- Lee District.
- About 2.1 miles long.
- About 6 acres of disturbance, 3 acres permanently paved
- 10' wide, fully lit, ADA compliant
- Two major bridges to cross Long Branch, a tributary of Accotink Creek, and its wetlands.



Entire project area is within the RPA



So, what's there?

Forested wetlands that include globally rare habitats:

- Coastal Seepage Wetlands
- Magnolia Bog

Globally rare and unique habitats



Sweet bay magnolia (*Magnolia virginiana*), for which the magnolia bog is named

- Magnolia bogs are unique to the fall zone in the MidAtlantic.
- Identified as critically imperiled in the Public Facilities Manual ([Table 12.5](#)).
- There are only a few dozen magnolia bogs in the world.
- Seepage Bogs have a special status designated by [VA Department of Conservation and Recreation](#).

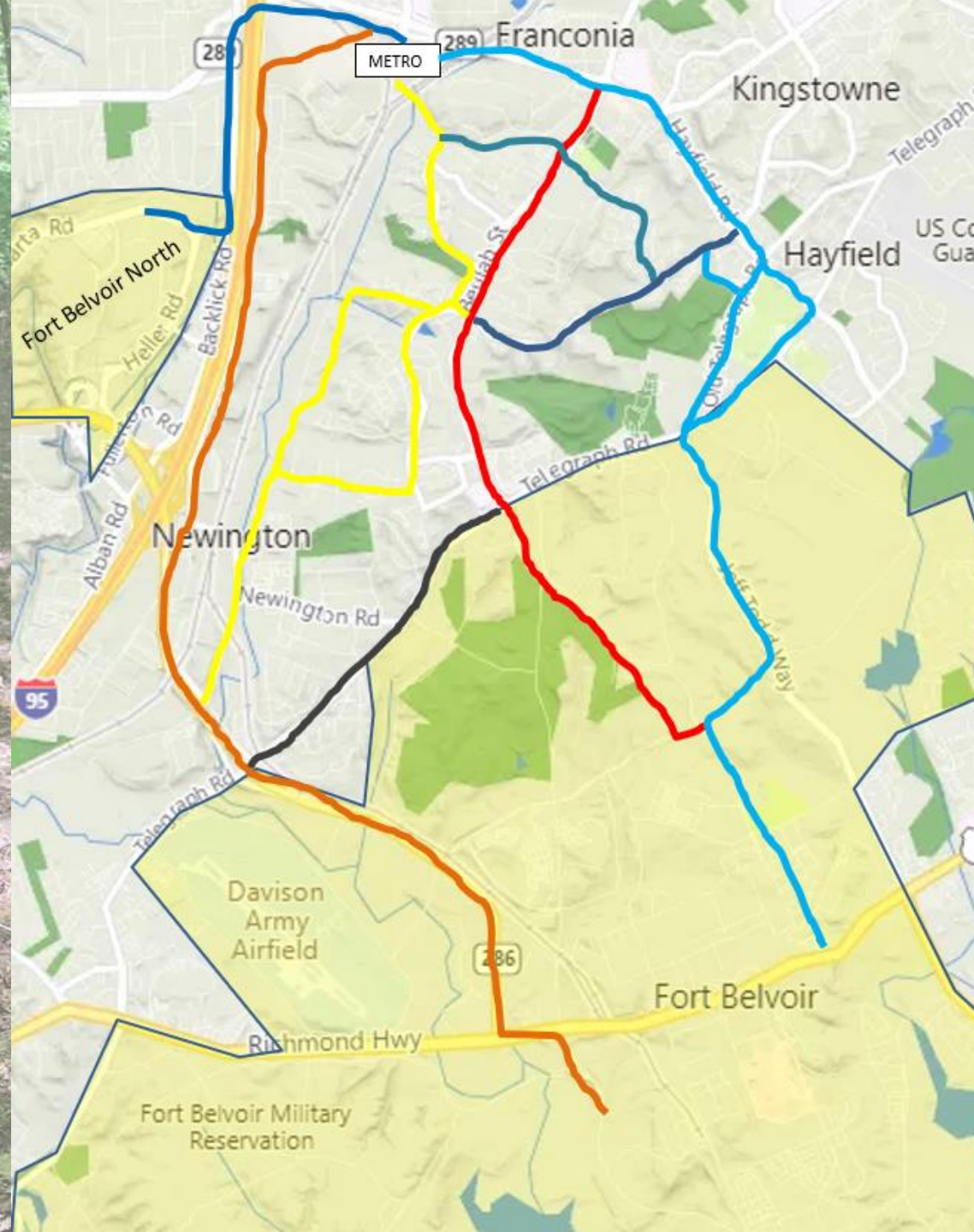
Impacts

- Magnolia bogs are highly sensitive to disturbance—affects the hydrology.
- Most have been extirpated.
- Amazingly, this one still exists, and much of it is healthy.
- Building a trail here will irreparably alter the hydrology.
- Disturbance will open the area up to invasion from exotics such as Japanese stilt grass.
- Will lead to extirpation of the magnolia bog.



- Is it necessary to destroy globally rare, healthy habitat to carry cyclists between Fort Belvoir and Metro?

Ample alternatives are available on existing streets and trails from Metro to all parts of Fort Belvoir



FCDOT did not consider alternative routes

Staff report:

- Other routes have more than 5% grade. The federal portion of funding requires ADA access—that requirement appears to drive the location.
- No analyses of projected volume of non-motorized use, no analyses to support claims of net emissions reductions.
- No county environmental review, no mapping of rare habitats.
- A Benefit/Cost comparison yielded a score of 0.7 in 2013.
 - A score less than 1.0 means net benefits take longer than 20 years to be realized.
 - Since then, project cost has tripled, from \$4 million to \$14 million, so B/C score must be lower.

Current status

- A group including Friends of Accotink Creek, Audubon Society of Northern Virginia, Audubon Naturalist Society, and others has been meeting with Supervisor Lusk.
- We plan a site visit with him and have asked him to pause the project and evaluate alternatives.

Broader concerns

#1. How can the supervisors make good decisions about a bicycle plan, or the merits of a particular trail, when no information about potential ridership and use, or about environmental impacts, is part of the decision making process?

#2. Does the current process adhere to environmental laws and regulations?

- Fairfax County's [Comprehensive Plan for Transportation](#) says:
Plan and design transportation facilities... to minimize adverse impacts on Environmental Quality Corridors (EQCs), Resource Protection Areas (RPAs), other environmental resources, and heritage resources. *Objective 7, Policy a*
- At what stage in the current process are adverse impacts of bikeways evaluated and minimized?
- We don't see it happening.

The Chesapeake Bay Preservation Ordinance protects RPAs

- This project was exempted as a passive recreation facility.
- But its primary purpose is transportation.
 - Funded by the FHA, state and local transportation funds.
 - A bikeway is not low impact, and does not seem to fit the intent of the passive recreation exemption, even if it meets the letter of the law.

Exemption as a public road seems more appropriate.

- “The exemption of public roads is conditioned on the **optimization of the road alignment and design...to prevent or otherwise minimize encroachment in the RPA....**” *CBPO 118-5-2*
- This condition was not met.
- The entire trail is in the RPA.

#3. If FCDDOT continues to exempt bicycle commuting infrastructure as passive recreation, it will blow a huge hole in C-Bay protections for RPAs and EQCs.

Four Recommendations, for your consideration

(1) The county should create a process and criteria to evaluate the natural resources and environmental impacts as an integral part of trail planning.

- Map what's there before plotting a trail through it.
- FCDOT should involve ecologically knowledgeable county staff in planning.

(2) Costs and benefits of proposed trails should be assessed before approving them, including

- Expected usage
- Environmental harms as well as monetary costs.

Recommendations

(3) The county should recognize the difference between:

- Trails primarily intended to bring people in contact with nature, which should be planned carefully to avoid impacts while providing experience in nature.

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- Bikeways primarily intended to move people, which should be routed through already disturbed areas, not through undisturbed and environmentally sensitive areas.

(4) As county policy, bike commuting facilities should be exempted as public roads under CBPO, not as passive recreation facilities.

A lush green forest scene with a stream and the text "Thank you!" overlaid. The forest is dense with various types of trees and undergrowth, including ferns and broad-leafed plants. The stream is visible in the lower center of the image, flowing through the forest. The text "Thank you!" is written in a bright yellow, sans-serif font, centered horizontally and slightly above the middle vertically. The overall atmosphere is peaceful and natural.

Thank you!