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Working Group, Master Transportation Plan Bicycle Element, c/o Richard Viola

Re: Master Transportation Plan, Bicycle Element, November 21, 2018 Working Draft

Ladies and Gentlemen:

We submit these comments on the November 21, 2018 Working Draft of the Master Transportation Plan, Bicycle Element (“Bicycle Plan”) on behalf of the more than 4,500 members of the Audubon Society Northern Virginia (“ASNV”). The mission of ASNV is to conserve and restore natural ecosystems, focusing on birds, other wildlife, and their habitats for the benefit of humanity and the earth's biological diversity. Many ASNV members are avid cyclists and recognize the environmental benefits of multi-use bike trails; however, as we noted in our December 6, 2018 comments on the Public Spaces Master Plan, cycling and multi-use trails should not be designed and built in a way that endangers or destroys valuable natural resources. Paved paths through natural areas destroy trees and other vegetation and result in erosion and contaminant runoff that can further degrade already challenged suburban streams and harm wildlife.

ASNV urges the Working Group, County staff and the Arlington County Board to amend the draft Bicycle Plan to eliminate the proposed Claremont to Four Mile Run Trail Connection (2-24) and Glencarlyn/Hospital Trail (2-26), and consider alternatives to the proposed N. Carlin Springs Road Trail (2-27) and Bluemont Park to Upton Hill Park Trail (2-30). ASNV also opposes trail widening or trail lighting along the W&OD and Four Mile Run Trails where they run through natural areas in Glencarlyn and Bluemont Parks. Our recommendations are discussed in detail below.

Claremont to Four Mile Run Trail Connection (2-24)

The proposed Claremont to Four Mile Run Trail Connection would add a paved trail through Barcroft Park property to the Four Mile Run Trail. The Trail would run through

Arlington's Magnolia Bog, an extremely rare wetland ecosystem that is globally significant. The area "is a refuge for wildlife not seen in other parts of the County in decades, including plants like the prickly bog sedge and interrupted fern, . . . birds such as the yellow-crowned night-heron and rusty blackbird . . . [and] rare dragonflies, butterflies, salamanders, and increasingly hard-to-spot gray foxes and eastern coyotes."¹ The area was proposed as a Natural Resource Conservation Area in the County's Natural Resources Management Plan.² The proposed trail, in addition to its potential harm to a significant ecosystem, is redundant to access to Four Mile Run trail via a planned bike lane on S. George Mason Road. Wakefield High has direct access to S. George Mason, and Claremont Immersion School has access to S. George Mason via S. Columbus Street. The proposed trail should be eliminated from the Bicycle Plan.

Glencarlyn/Hospital Trail (2-26)

The exact path of the proposed trail is not clear from the description in the Bicycle Plan and the associated Bike Network Map, but it appears to run from 7th Road South, behind Campbell Elementary School, over Long Branch Creek and to the Glencarlyn neighborhood and the Virginia Hospital Center property, either through the existing scenic easement behind the hospital or Glencarlyn Park property. The Bicycle Plan says it is to be "on the former Northern Virginia Community Hospital site" and would "link the Glencarlyn and Forest Hills [sic] neighborhoods" to provide improved access to Campbell school and adjacent parkland and a low-stress route between Columbia Pike and Arlington Boulevard.

Whatever the route, the proposed trail would destroy valuable natural resources to provide only marginally more direct access to the Hospital Center property.

- The proposed pathway runs through or is adjacent to sections of Glencarlyn Park recommended as a Natural Resource Conservation Area in the County's 2010 Natural Resources Management Plan.³ Resources in those areas include significant natural woodlands, locally-rare native plants, and a historic spring and woodland seeps.
- The area between the Forest Glen subdivision and Campbell School off of 7th Road South is a steep and heavily forested section of Glencarlyn Park, south of Long Branch Creek. It is habitat for a range of wildlife and native plants and prevents contaminated runoff into Long Branch Creek. Disturbing the trees and groundcover for construction or maintenance of a bike path, in addition to adding pavement, promotes increased runoff and erosion, disturbs local wildlife and promotes invasion of non-native plants.

¹ Matt Blitz, "Arlington's Magnolia Bog: A Rare Ecosystem, Arlington Magazine, July 30, 2018, at <https://www.arlingtonmagazine.com/bogged-down/>. See also an article on the restoration of the bog in a publication by the Arlington Regional Master Naturalists at <https://armn.org/2016/09/22/barcroft-magnolia-bog-restoration-project-receives-2016-achievement-award/>.

² Natural Resources Management Plan, November 13, 2010, Appendix 1, p. 37.

³ Natural Resources Management Plan, November 13, 2010, Appendix 1, p. 35.

- Any path would have to cross Long Branch Creek, cutting through a proposed resource protection area in Arlington County’s Chesapeake Bay Preservation Area.⁴ Construction of a path over Long Branch would require loss of trees and ground cover and increase erosion and incursion of non-native plants.

- The continuation of the path up the hill towards the Glencarlyn neighborhood either would cross a scenic easement behind the medical office building on S. Carlin Springs Road and the Virginia Hospital Center or a section of Glencarlyn Park. Either route has adverse consequences:
 - The scenic easement is the location of historic Moses Ball Springs and the beginning of the Salamander Creek Stream which runs down to Long Branch and supports locally significant and rare breeding populations of spotted salamanders and tree frogs. Disturbing that area is likely to result in permanent loss of those resources.

 - If the path is adjacent to the easement and runs through Glencarlyn Park property, it could easily destroy Willow Pond, a vernal wetland on the north side of Long Branch, a teaching resource for Long Branch Nature Center and a breeding area for tree peepers. A path through the Park instead of the easement also would cross and disturb Salamander Creek Stream, resulting in harm to the spotted salamanders and tree frogs.

There is a question whether the bike path even could run through the scenic easement, i.e., whether it would have to be routed through Glencarlyn Park. The easement (to Arlington County) was granted “for the purpose of preserving the visual concept” of the property in 1974. It prohibits “physical use” by the public and construction of “buildings or structures” with the exception of fencing. The easement prevents modification of the topography by grading or filling, except as required to install and maintain storm drainage to prevent erosion. Finally, no trees can be removed unless they are dead, dying or diseased.⁵ ASNV does not have enough information to analyze fully the consequences of the County’s acquisition of the Virginia Hospital Center property on the scenic easement, including whether it would continue in force; however, ASNV strongly recommends that the County not override restrictions it imposed in 1974 to keep that area undeveloped green space, when acquisition and preservation of green space is a priority goal of the Public Spaces Master Plan.

The loss of natural resources from the proposed bike path is particularly wasteful because there are existing nearby routes between 7th Road South and the Glencarlyn neighborhood that easily provide the access cited as the basis for the path. A mere three

⁴ Arlington Virginia Chesapeake Bay Preservation Area, eff. January 1, 2018, at https://building.arlingtonva.us/wp-content/uploads/sites/38/2017/09/RPA_Final_ChesBay_Eff_Jan2018.pdf.

⁵ See Scenic Easement Deed, dated February 11, 1974, Deed Records of Arlington County, Sec. 1861, Page 189.

blocks east on 7th Road South from the proposed bike path are neighborhood roads through Forest Glen that link to existing bike paths in Glencarlyn Park. Similar access is available two more blocks east via Tyrol Hills Park. The bike paths in Glencarlyn Park lead directly (a) to the west to Carlin Springs Road between Campbell School and the Medical Center Property, (b) to the east to the W&OD trail, and (c) to the north to a Park road to 4th Street South in the Glencarlyn neighborhood. Those roads and pathways are already in use to connect the neighborhoods, Campbell Elementary School and the Hospital Center property and provide the desired “low-stress” route between Columbia Pike and Arlington Boulevard.

N. Carlin Springs Road Trail (2-27)

The N. Carlin Springs Road Trail appears to involve widening existing sidewalks adjacent to the Kenmore Middle School and north of Route 50. It is not clear how an off-road trail could be accommodated under the Route 50 underpass. North of the underpass, the proposed off-road trail appears to require destruction of trees and other vegetation in Bluemont Park and the Mary Carlin Woods.⁶ The path of the proposed trail, in addition to causing loss of valuable green space, does not appear feasible. Although longer, a route from Kenmore to 5th Road South (and then to Manchester and the trails north of Route 50) via Kenmore and Carlin Springs Elementary property appears a more feasible (and safer) alternative.

Bluemont Park to Upton Hill Park Trail (2-30)

Although the exact path is not clear from the Bicycle Plan and associated Bike Network Map, a portion of the proposed Bluemont Park/Upton Hill Trail appears to involve a paved trail on the south side of Wilson Boulevard, which would result in loss of trees and green space in Upton Hill Park. That path would, then, add to the loss of tree canopy from current approved Park construction plans. ASNV suggests that the County consider as an alternative re-striping the south side of Wilson Boulevard from Upton Hill Park to create an on-road bike line, while preserving street parking. Wilson Boulevard already narrows to one lane as it approaches Bluemont Park, and re-striping the south side lanes creates a better bike path while preserving Upton Hill Park vegetation and costing less than constructing a paved off-road path.

W&OD and Four Mile Run Trail Upgrades (2-01)

As the Working Group is aware, the W&OD and Four Mile Run trails through Glencarlyn Park and Bluemont Park are used by cyclists, as well as runners, joggers and walkers (including birdwatchers) keeping a less strenuous pace. As a consequence, cyclists often have to keep a slower pace through those sections of the trails, just as drivers have to keep a slower pace when they run into congestion on the roads. The response to a cyclist’s slower speed is not necessarily to widen the paths. Wider paths that allow higher speeds for cyclists will create

⁶ It also appears to require taking some private property (e.g., from the Arlington Forest Club). Any extension of the trail past N. Kensington would be particularly troubling given the easily accessible connection via N. Kensington to the Bluemont Junction Trail.

greater dangers for other trail users as 15-mph cyclists pass slower runners, joggers and walkers.

ASNV opposes widening the W&OD and Four Mile Run trails where they run through Glencarlyn Park and Bluemont Park. The trails in those Parks run through natural areas that are largely sensitive stream valleys where construction and additional paving will result in loss of trees and other vegetation, erosion, contaminated runoff and increased potential for flooding. The trails are in or adjacent to proposed resource protection areas in Arlington County's Chesapeake Bay Preservation Area⁷ as well as Natural Resource Conservation Areas proposed in the County's Natural Resources Management Plan.⁸ In many locations the trail is adjacent to steep drop-offs that prevent widening, or important natural Park features that could be destroyed by expansion of the trail. An example is Sparrow Pond in Glencarlyn Park, which is scheduled for renovation in 2020 to restore wetland water filtering after years of siltation. The pond is directly adjacent to the trail and there is a steep drop-off on the other side of the trail, which prevents widening without destruction of the Pond.

Trail widening is not the only potential upgrade that is problematic for natural resources. The Bicycle Plan suggests possible trail lighting. The Parks, except in certain limited areas, are not lighted at night. Numerous studies have demonstrated that birds, mammals, reptiles and amphibians, insects and even plants are all disturbed by artificial light at night.⁹ Among other problems, it causes disruption in their sleep patterns, increased stress, increased nighttime activity without corresponding increases in food consumption, and disruption in breeding patterns. Arlington County already has far too much light pollution. The County's parks are among the last refuges that birds and other animals have from the disruptive effects of nighttime lighting. For that reason, ASNV opposes any move to light the trails through natural areas.

⁷ Arlington Virginia Chesapeake Bay Preservation Area, eff. January 1, 2018, at https://building.arlingtonva.us/wp-content/uploads/sites/38/2017/09/RPA_Final_ChesBay_Eff_Jan2018.pdf.

⁸ Natural Resources Management Plan, Appendix 1, pp. 34-35.

⁹Light 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, <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>.

If you have any questions, please contact us at president@audubonva.org.

Very truly yours,



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