

April 27, 2026

Scott Cecchi, Project Manager  
California Tahoe Conservancy  
1061 Third Street  
South Lake Tahoe, CA 96150  
*Submitted via email: [Scott.Cecchi@tahoe.ca.gov](mailto:Scott.Cecchi@tahoe.ca.gov)*

Re: Scoping Comments on the Draft Supplemental Initial Study / Mitigated Negative Declaration and Initial Environmental Checklist - Van Sickle Bi-State Park Safety and Equitable Access Improvements Project

Dear Mr. Cecchi,

The League to Save Lake Tahoe (Keep Tahoe Blue) appreciates the opportunity to provide scoping comments on the Draft Supplemental Initial Study/Mitigated Negative Declaration and Initial Environmental Checklist (Draft Supplemental IS/MND/IEC) for the Van Sickle Bi-State Park Safety and Equitable Access Improvements Project (Project).

Keep Tahoe Blue is dedicated to protecting and restoring the environmental health, sustainability, and scenic beauty of the Lake Tahoe Basin. In connection with our mission, advocate for policies and projects that build resilience to climate change, reduce wildfire risk, and prevent fine sediment and nutrients from entering Lake Tahoe. These are outcomes that depend on strong, science-based analyses and plans.

Keep Tahoe Blue strongly supports investments that improve safe, equitable, non-motorized access to recreation while protecting Lake Tahoe's water quality, forest health, and sensitive habitats. The Van Sickle Bi-State Park Project is uniquely positioned to advance these shared goals, particularly given its proximity to the South Shore tourist core and its role in reducing vehicle trips to access recreation.

To ensure the environmental review is comprehensive, legally defensible, and aligned with Tahoe's environmental thresholds, we offer the following scoping comments for consideration in the Final Supplemental IS/MND/IEC.

### **Project Purpose, Need, and Consistency with Regional Goals**

We support the Project's emphasis on:

- Environmentally friendly and accessible recreation
- Improved pedestrian and bicycle connectivity
- Enhanced safety at the park entrance and state line

The Final Supplemental IS/MND/IEC should more explicitly tie Project improvements to:

- Achieving and maintaining TRPA's transportation and air quality thresholds, including Vehicle Miles Traveled (VMT) reduction
- Regional Transportation Plan (RTP) and active transportation goals
- Environmental Improvement Program (EIP) objectives related to water quality, recreation access, and climate resilience.

Clarifying how the Project supports car-free or car-light recreation access from the casino core would strengthen the Project's environmental benefits and its consistency with Basin-wide policy direction.

### **Transportation, Circulation, and VMT Analysis**

Because the Project is designed to shift recreation access away from short vehicle trips, the Final Supplemental IS/MND/IEC should:

- Clearly explain how the Class I shared-use trail, entrance plaza, and internal circulation improvements are expected to reduce short-distance vehicle trips, particularly for visitors staying within walking or biking distance.
- Include a qualitative discussion of induced mode shift (walk/bike instead of drive), even if quantitative VMT modeling is infeasible.
- Evaluate potential peak-period conflicts between vehicles, pedestrians, and cyclists at the park entrance, and clearly describe physical or operational mitigation measures to minimize conflicts.

This analysis will help to better demonstrate consistency with achieving and maintaining TRPA transportation and air quality thresholds.

### **Water Quality, Stormwater Management, and Snow Storage**

Keep Tahoe Blue strongly supports the Project's emphasis on water quality improvements. Given the Project's proximity to stream environment zones (SEZs), clear documentation of design assumptions and performance expectations is essential to improving water quality within the Project area.

To strengthen the analysis, the Final Supplemental IS/MND/IEC should:

- Clearly document net changes in impervious coverage, including how any new coverage would be offset through best management practices (BMPs) or removal of legacy impervious areas;
- Provide greater detail on how stormwater and snowmelt will be treated prior to infiltration, particularly for winter operations; and
- Ensure that stormwater BMPs are designed to meet or exceed current TRPA and Lahontan stormwater treatment standards, with a focus on fine sediment and pollutant capture.

### **Stream Environment Zones (SEZs) and Sensitive Habitats**

We appreciate the commitment to minimize SEZ disturbance and to offset unavoidable impacts. The Final Supplemental IS/MND/IEC should:

- Clearly identify temporary versus permanent SEZ disturbance to minimize short and long-term water quality impacts, including construction staging impacts;
- Clarify how final trail alignments will be designed to avoid additional SEZ encroachment;
- Ensure that SEZ offsets and restoration credits will be secured and implemented prior to construction; and
- Include performance standards and monitoring commitments to ensure long-term SEZ function is maintained or enhanced.

### **Forest Health, Tree Removal, and Climate Resilience**

Keep Tahoe Blue supports forest health and safety improvements and recommends clearly distinguishing tree removal for infrastructure from forest resilience treatments. The project should clearly document how tree removal supports wildfire risk reduction to create forest and climate resilience while maintaining habitat function.

### **Cumulative Impacts and Future Phases**

Given ongoing and anticipated improvements in the South Shore area, the Final Supplemental IS/MND/IEC should clearly describe how the Project will interact with future park phases and nearby transportation or recreation projects. The Project should address cumulative impacts from the Project by explaining how future phases will build on the water quality and access benefits of this Project.

### **Alternatives**

Enhanced Car-Free Access / Reduced Parking Alternative (New Alternative)

In addition to the proposed Project and No Project Alternative, the environmental document should evaluate an alternative that prioritizes car-free and car-light access by:

- Reducing or deferring paved parking expansion at the California day-use area
- Placing greater emphasis on pedestrian, bicycle, and transit-connected access from the South Shore tourist core
- Scaling entrance and internal circulation improvements to prioritize non-motorized users during peak periods
- Phasing the project with early implementation of active transportation, safety, and ADA-access improvements (such as shared-use trails and entrance safety features), while deferring parking reconfiguration and higher-disturbance elements to a later phase, allowing monitoring and evaluation of use patterns, mode shift, operational needs, and environmental performance before committing to additional vehicle-oriented infrastructure.

This proposed alternative would meet core Project objectives related to access, safety, and equity while potentially reducing vehicle trips, impervious coverage, stormwater impacts, and construction disturbance. Analysis of this alternative would directly support regional goals related to VMT reduction, air quality, and water quality.

**Conclusion**

Keep Tahoe Blue supports the Van Sickle Bi-State Park Safety and Equitable Access Improvements Project and appreciates the Conservancy's leadership in advancing accessible, low-impact recreation near the South Shore tourist core. Addressing the scoping considerations outlined above will strengthen the environmental document and ensure the Project delivers long-term benefits for Lake Tahoe, park users, and surrounding communities.

Thank you for considering our comments. We look forward to continuing to work with the Conservancy and partner agencies as the Project advances.

Sincerely,

A handwritten signature in black ink, appearing to read "Gavin Feiger", with a long horizontal line extending to the right.

Gavin Feiger  
Policy Director