

Memorandum

SACRAMENTO

MAIL & DELIVERIES

P 916-283-5800
F 916-273-4054
6151 Fair Oaks Blvd, Ste. 108
Carmichael, CA 95608

LAKE TAHOE

NO MAIL

P 775-267-7202

To: Tom Jacobson, EKN Development Group

From: Rob Brueck

Date: October 14, 2022

Subject: Scenic Quality Evaluation of Lake Tahoe Hotel & Residences
(formerly Boulder Bay) Project Revisions

This memorandum provides an evaluation of scenic quality associated with revisions to the Boulder Bay project approved by TRPA in 2011 and documented in the site plans prepared by SB Architects for the Lake Tahoe Hotel & Residences (50% Schematic Design – TRPA Review Submission dated 10/12/2022). The evaluation focuses on how the proposed project revisions may change the scenic quality analysis and conclusions included in the 2009 Draft Environmental Impact Statement for the project.

Lake Tahoe Hotel & Residences Project Revisions

With a change in ownership, the Boulder Bay project approved by TRPA in 2011 has been revised with a modern interpretation of the traditional mountain vernacular in the region. The contemporary architectural vocabulary will utilize clean lines, varied pitched roofs, deep terraces and balconies. Expressing the context, it will feature a material palette of warm wood tones, accented by natural stone with complimentary metal tones capturing and mirroring the magnificence of the Sierra Nevada Mountains.

Figure 1 documents the 2011 approved Alternative C site plan and current proposal. Notable differences include a reduction in the size of building F to expand the public plaza (e.g., the Grove) located in the middle of the development and the addition of a guest arrival area located between buildings B and D. With the new guest arrival location off of Stateline/Lake View Avenue, the current proposal eliminates the proposed vehicular roadway (Boulder Way) that would have paralleled State Route 28 (SR 28) behind buildings G and H.

Figure 2 documents examples of changes to building design and architectural character with a comparison of elevations for building F (top two elevations) as viewed from the interior plaza (e.g., the Grove) and building H (bottom two elevations) as viewed from SR 28. The first elevation represents the building design as approved in 2011. The second elevation represents the current design revision.

Under the project revisions, the configuration of proposed buildings would not be substantially changed, but would include slight changes to footprint size, placement and architectural design. Therefore, this evaluation focuses on the changes relative to the original analysis included in the Boulder Bay Draft Environmental Impact Statement (DEIS).

Figure 1: Site Plan Comparison



Previously Approved Alternate C - Landscape Illustrative



Proposed Design Revision - Landscape Illustrative

Figure 2: Comparison of Building F (top) and Building H (bottom) Elevations



1 BUILDING F - SOUTHEAST ELEVATION
1/16" = 1'-0"



1 BUILDING H - SOUTHEAST ELEVATION
1/16" = 1'-0"

TRPA SCENIC RESOURCE UNITS

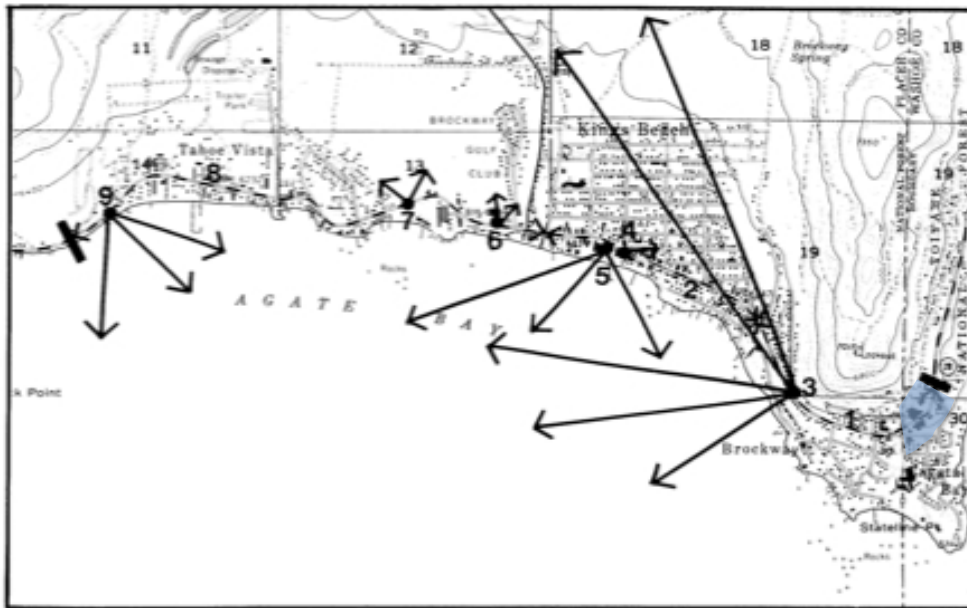
The 2009 DEIS provided a description of the visual setting and scenic resources of the project area, identified scenic impacts that would result from implementation of the Project (Alternative C), and recommended scenic mitigation measures. The Project area is visible from the portion of SR 28 designated as Roadway Unit 20D: North Stateline (highlighted blue in Figure 3) and Shoreline Unit 23: Crystal Bay (Figure 10) from Lake Tahoe.

The following evaluation describes the applicable scenic resources that were addressed in the 2009 DEIS and provides an analysis of how the proposed project revisions may change the scenic quality conclusions that were identified for the project.

Roadway Travel Unit 20D (North Stateline Casino Core)

The Project area is located along the portion of SR 28 originally designated as Scenic Roadway Unit 20. In 2001, TRPA divided this Roadway Unit into four sub-units because of its length and diversity of character. The Washoe County portion of the Roadway Unit was relabeled 20D. The scenic quality rating is based on foreground, middleground and background views, views to the lake from the roadway, and other special features. The 2019 scenic quality travel route ratings are listed on TRPA's website (<https://thresholds.laketahoeinfo.org/ThresholdIndicator/Detail/58>). Roadway Unit 20D: North Stateline Core is a nonattainment area with a threshold composite score of 13.5 out of a possible score of 30; any units with a score of 15 or less are considered nonattainment areas in need of visual improvements.

Figure 3: Roadway Unit 20D (North Stateline Casino Core)



The 2009 DEIS (HBA, page 4.5-2) provided the following setting information for Roadway Unit 20D. This unit score increased from 13 in 2001 to 13.5 in 2006 due to the removal of a billboard (note: no changes have been made to the unit scores since 2006). Near the project site, the scenic quality is rated as low due to the poor quality of the high-density commercial uses and housing. This roadway unit is categorized as an “urban, rural transition visual environment.” The segment of the roadway unit in the project area is categorized as an urban environment. Urban scenic highway corridors are generally urbanized areas where man-made development is the dominant visual feature. According to the TRPA Scenic Quality Improvement Program (SQIP), the Stateline area is considered an “area of concern” due to

a disorganized visual character that contains poorly designed and/or maintained structures placed close to the roadway with little landscaping, uncoordinated signage, and visible overhead lines and satellite dish antennae. In addition, highly visible parking directly off SR 28 further affects the visual quality and contributes to traffic issues that also affect the visual character of the Stateline area. The SQIP also states that the scale, height and density of structures in the casino core are problematic and in contrast with the surrounding area. The SQIP recommends landscaping along the roadway and within developments (Chapter 30), signage consistent with TRPA guidelines (Chapter 26), landscape screening, and architectural upgrades to the casino buildings so that they reflect the natural character of Lake Tahoe. The Project responds to this recommendation by including landscaping along public roadways, integrating signage into the pedestrian amenities and building facades, and replacing the large monotone exterior of the Biltmore casino structure with building colors and materials more in line with the nearby natural landscape.

Roadway Unit 20 has an overall scenic quality rating of 2 and a rating of 2 for each of the scenic quality rating indicators (SQIP 1988 rating). Scenic quality rating indicators include: 1) Unity – the extent in which a landscape feature can be described as cohesive, 2) Vividness – a memorable or distinct quality, 3) Variety – the intermixture of interesting elements of a landscape unit, and 4) Intactness – the extent to which a landscape retains its natural condition.

Impact SR-2 of the DEIS (page 4.5-46) concludes that:

“the Project will result in site changes visible from SR 28 and Lake Tahoe. Views of project structures will be minimal from Lake Tahoe (DEIS Figure 4.5-12), and will not be visible from Scenic Recreation Units 7 or 8 (DEIS Figure 4.5-3). The project will be highly visible from SR 28, other local roadways and adjacent casinos and residences. While the project will be highly visible from SR 28, redevelopment of the project area will improve the architectural character of the area, will increase and improve landscaping, and will include the restoration of several previously disturbed areas (e.g., the former Tahoe Mariner site, Crystal Bay Motel, and the offsite Stateline mini-park site under a Boulder Bay agreement with Placer County).”

Key takeaways from the DEIS analysis of the original Project (Alternative C) include:

- Despite the increase in foreground structural elements at this location compared to the existing surface parking lot, the project would not decrease views through the project area to the ridgeline located to the northwest;
- Structures set back less than 60 feet from the State Route 28 edge of pavement may not exceed three stories tall, buildings G and H shall be reduced to two stories tall;
- While the project will be highly visible from SR 28, redevelopment of the project area will improve the architectural character of the area, will increase and improve landscaping, and will include the restoration of several previously disturbed areas;
- All of the structures would utilize the “Alpine Elegance” style of architecture promoted in the Community Plan and TRPA design guidelines. Buildings will consist of wood and stone treatments, gables, overhangs, and multiple planes;
- Reflective building materials shall be avoided and any metal roofing shall be consistent with TRPA recommended materials and colors;

- The spacing of the proposed buildings provides several viewsheds into and through the project area to the ridgeline behind as viewed from SR 28;
- While the existing casino structure is highly visible from SR 28 and does not blend with the natural background views, the structures (buildings G and H) closest to SR 28 under Alternative C are less dense, less massive, and more in character with the urban and natural landscape of Crystal Bay;
- The area will remain predominantly urban, but will also include some improvement with the removal and restoration of the Crystal Bay Motel, development of the mini-park at the Stateline under a Boulder Bay agreement with Placer County, and proposed landscaping along pedestrian spaces;
- The removal of the storage area located below Lakeview Avenue and its replacement with the realigned Wassou Road and building's A and B will not adversely affect overall visual quality because neither the proposed buildings or roadway modifications will block existing views of Lake Tahoe as seen from the northern end of the project area or the adjacent residential neighborhood to the north.
- However, the upper floor and roofline of building A will be highly visible from passing motorists due to the proximity of the building's location to SR 28. Based on the loss of natural views from SR 28 viewpoints due to the visibility of building A's roofline, this impact was identified as significant. Mitigation measure SR-1B (Redesign building A) was included in the DEIS to reduce the potential impact to less than significant.

In summary, the 2009 DEIS (page 4.5-49) documented anticipated benefits to the roadway unit ratings from implementation of the Alternative C Project as follows:

"Table 4.5-6 documents the changes to scenic roadway and shoreline unit travel route ratings for Alternative C. Roadway Unit 20D will see a 1.5 point improvement to the threshold composite with the increased scoring for manmade features and roadway distractions. The Roadway Unit 20D man-made features travel route rating criteria will improve from 2.5 to 3.5 as a result of the removal of man-made distractions including approximately 0.5 mile of overhead utilities, non-conforming signage (including the 60 foot tall Tahoe Biltmore sign), the Crystal Bay Motel, and the 76-foot tall Tahoe Biltmore hotel and casino building which does not provide adequate setback from SR 28. This improvement is limited to 1 point because of the increase in overall man-made features within the project area, including new man-made features on the northern end of the project area in the location of the open space required in the current Tahoe Mariner Settlement Agreement. The roadway distractions travel route rating criteria will improve from 3 to 3.5 as a result of the removal of two uncontrolled curb cuts on SR 28 (current Tahoe Biltmore parking lot access points and Reservoir road) and improvements to pedestrian and bicycle amenities along SR 28 that will improve pedestrian-auto safety."

As part of the Project approval in 2011, deed restricted open space outlined in the Tahoe Mariner Settlement Agreement was relocated to other areas in the Boulder Bay project area. This relocation allowed for the consolidation of urban land uses on the southern end of the project area and preservation of the entirety of the far northern end.

Table 4.5-6**Alternative C - Scenic Roadway and Shoreline Unit Travel Route Ratings**

	Roadway Unit 20D		Shoreline Unit 23	
	Existing Rating	Change	Existing Rating	Change
Manmade Features	2.5	3.5	1	1
Roadway Distractions	3	3.5	--	--
Road Structure	3	3	--	--
Lake Views	1	1	--	--
Landscape Views	1	1	3	3
Variety	3	3	3	3
Threshold Composite	13.5	15.0	7	7
Status	Non-attainment	Non-attainment	Non-attainment	Non-attainment

Source: Hauge Brueck Associates, 2009

Note: Changes as a result of the Project would improve the Roadway Unit 20D rating.

Analysis of Revised Project

To assist with this evaluation, updated photographic simulations (Figures 4 to 8) were prepared by project architects (SB Architects, 2022) to show how the revised Lake Tahoe Hotel & Residences Project design compares to the scenic quality analysis prepared for the Boulder Bay Project (Alternative C) in the 2009 DEIS. Each viewpoint (with the exception of Figure 8 which provides a new viewpoint location for this study) includes the existing condition, the 2009 simulation prepared for Alternative C and the simulation prepared for the current Project revision (2022). As shown in the simulations, the proposed revision to building location, footprint and architectural style result in minimal change to the overall building height and massing that was documented in the 2009 DEIS simulations. Noticeable changes are evident from viewpoints 13 and 14 (Figures 4 and 5).

At viewpoint 13 (SR 28 and Stateline) the casino façade (building E on left side of the image) is closer to the viewpoint location in the revised plan and somewhat wider and taller. However, neither the 2009 or current building design block views of a mapped TRPA scenic resource or ridgeline from this viewpoint, and both offer an improvement to building setback from the roadway, architectural style, and landscaping as compared to the existing Biltmore structure. At viewpoint 14 (Biltmore parking lot from SR 28), the revised location, size and architectural design of buildings G and H will continue to provide views through the project site of the ridgeline to the west and improve manmade features by replacing existing surface parking and retaining walls with buildings and landscaping that are consistent with Area Plan community design goals.

At viewpoint 15, building A is now seen alongside the roadway in the existing condition photo, as it was completed as Phase 1A in 2018. As shown in the 2009 simulation (Figure 6), vegetative planting was proposed along the roadway on either side of the park access roadway to screen the lower floors of the building. The landscaping proposed alongside SR 28 for the 2009 Project was revised as part of project review in 2017 to address changes to the park entrance roadway configuration (green areas highlighted on Figure 9), but has not been effective at providing the screening simulated during the DEIS analysis. It is likely that the small existing conifers will take another 5 to 10 years of growth to provide the proposed

level of building screening. As such, additional landscaping, consisting of larger diameter trees, shall be required on each side of the park access roadway to improve screening of the building A ground level floors as viewed from the SR 28 viewpoint. Figure 9 shows the location of the required supplemental planting and the Figure 6 simulation documents the additional planting on each side of the park entrance roadway that is necessary to comply with the DEIS screening mitigation. The proposed supplemental planting includes 2 evergreen trees approximately 10-12 feet tall on the south side of the park access roadway and 3 evergreen trees approximately 10-12 feet tall on the north side of the park access roadway.

A new viewpoint (Figure 8) was added for this analysis to document potential changes to viewpoints while traveling north on SR 28. As shown in this new viewpoint location, existing vegetation that is proposed to remain within the SR 28 right of way along with proposed landscaping within the pedestrian corridor provides effective screening of proposed buildings (e.g., buildings G and C) and the south side of building A. As such, the existing vegetation shown in the simulation (highlighted in green) shall be protected and maintained in this location. A review of the site plan confirms that these four evergreen trees are healthy and will not be damaged during grading for utilities or the building G site preparation. Each of the trees is on the SR 28 side of the proposed pedestrian walkway and over 20 feet from the building G foundation.

At viewpoint 16, the simulation for the revised Project is consistent with the building height and massing proposed in the 2009 DEIS. From this Lake View Avenue viewpoint located above the Project in the residential neighborhood, the proposed buildings will not obstruct views to Lake Tahoe nor the ridgelines beyond.

Conclusion

In each viewpoint location, the revised Project structures are consistent with the building design, location and massing analyzed in the 2009 DEIS. Therefore, with the recommendations summarized below (e.g., protect the existing trees shown in the new simulation viewpoint and supplement building A vegetative screening), the revised project does not result in new scenic quality impacts associated with the overall threshold composite score for Roadway Unit 20D, nor does it require additions to the existing mitigation measures included in the DEIS. The scenic quality threshold improvement scores identified in the 2009 DEIS (Table 4.5-6) should continue to be realized following Project construction and subsequent TRPA evaluation.

Summary of Recommendations

1. Additional landscaping, consisting of taller evergreen trees, shall be required on each side of the park access roadway to improve screening of the building A ground level floors as viewed from the SR 28 viewpoint 15 (see areas highlighted in green on Figure 9 and the simulated planting plan on Figure 6). These trees shall be included on the Project landscaping plan for TRPA review and approval as part of the Permit Revision process.
2. Existing vegetation located adjacent to building G consisting of four conifer trees within or near the SR 28 right of way and shown in the photo simulation (see trees highlighted in green in Figure 8) shall be protected and maintained as part of the Project plans.

Figure 4: Viewpoint 13 from SR 28 and Stateline



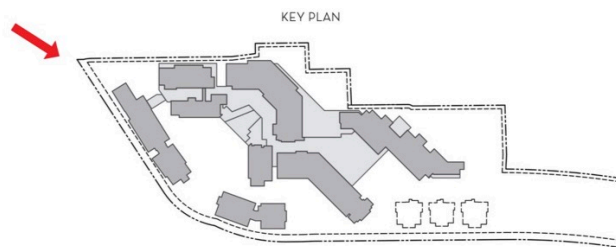
EXISTING SITE CONDITIONS - UPDATED



PREVIOUS APPROVED ALTERNATE C

VIEW 01 - FROM SR 28 & STATELINE

View comparison when approaching the project site from the south along Highway SR 28 at the intersection of State Line Road.



PROPOSED DESIGN REVISIONS

Figure 5: Viewpoint 14 from SR 28



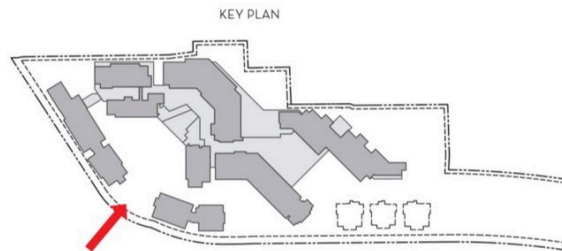
EXISTING SITE CONDITIONS - UPDATED



PREVIOUS APPROVED ALTERNATE C

VIEW 02 - FROM SR 28

View comparison when driving past the sweeping curve from west moving north along the project site on Highway SR 28.



PROPOSED DESIGN REVISIONS

Figure 6: Viewpoint 15 from SR 28 Looking South at Building A (Phase 1)



SITE CONDITIONS PRIOR TO BUILDING A



PREVIOUS APPROVED ALTERNATE C



EXISTING SITE CONDITIONS



PROPOSED LANDSCAPE ADDITIONS

Figure 7: Viewpoint 16 from Lake View Avenue



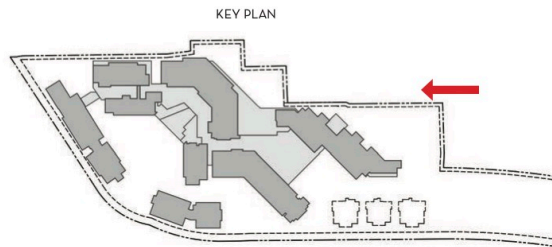
EXISTING SITE CONDITIONS - UPDATED



PREVIOUS APPROVED ALTERNATE C

VIEW 04 - FROM LAKE VIEW AVE.

View comparison when approaching the site from the east along Lakeview Ave. The highest level of building massing is shown being obscured by trees along the road. The clear view of the lake horizon is indicated along with the distant mountain ridge lines beyond.



PROPOSED DESIGN REVISIONS

Figure 8: New Viewpoint Looking North on SR 28



EXISTING SITE CONDITIONS



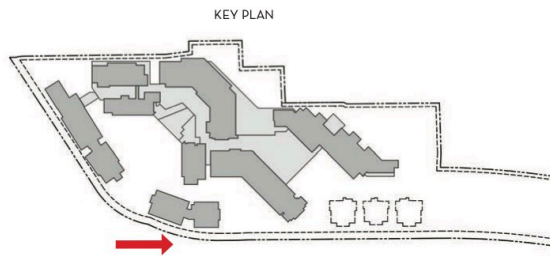
PROPOSED DESIGN REVISIONS

VIEW 05 - ADDITIONAL VIEW FROM SR 28

View comparison when driving north along SR 28 past buildings G, approaching Big Water Drive and existing condo buildings of Phase A.

The two story volume of building G is described screen intermittently by landscape elements and trees. Included in this view are the pedestrian improvements along the SR 28 frontage.

The larger trees anchoring the building C amenity area help screen the volume of the building beyond.



[illegible]

The Project area is located west of Crystal Bay (Shoreline Unit 23) on Lake Tahoe's north shore between King's Beach and Incline Village (see blue highlighted area on Figure 10). Shoreline Unit 23: Crystal Bay is a nonattainment area with a threshold composite score of 7.5 out of a possible score of 15; any units with a score of 7 or less are considered nonattainment areas in need of visual improvements. Unit 23 is considered nonattainment because the current composite score of 7.5 is less than the score of 11 that was recorded in 1982.

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Figure 10: Shoreline Unit 23 (Crystal Bay)



Analysis of Revised Project

Impact SR-2 of the 2009 DEIS discloses that the top floor and roofline of building C will be visible from Lake Tahoe (page 4.5-46) through an existing forest clearing, but concludes that the visible portion of the structure will not exceed the height of the existing trees and would be similar to the visibility of the existing Crystal Bay Motel that is proposed for demolition. The DEIS concludes that Alternative C development will only be visible where existing development is currently visible, and so the impact as viewed from Lake Tahoe viewpoints is considered to be less than significant. The project revisions would not substantially increase the height or location of building C and therefore the 2009 DEIS impact conclusions for Shoreline Unit 23 would remain unchanged.

Scenic Recreational Resources

In addition to the roadway and shoreline unit resources discussed above, there are scenic recreational resources nearby the project site including Burnt Cedar Beach (Unit 8), Incline Beach (Unit 7) and Ski Incline (Unit 6), all of which are located east of the project area. The 2009 DEIS (page 4.5-4) provides the following setting information for these nearby recreational resources:

“Ski Incline includes distant views of the lake and southwestern shores, while the two beaches provide wide views of the lake and surrounding shorelines. Each scenic recreation area is rated in attainment as shown in Table 4.5-2. According to the 2001 scenic quality rating, development at Stateline, primarily road cuts and structures extending above the canopy level or located on the slopes of Crystal Bay are visible from the beaches and detract from the natural scenic quality. Views toward the project area from the beaches are shown in Figure 4.5-3. Views from Ski Incline do not include the project site due to distance, topography and screening vegetation (as viewed from the ski resort) at the ski resort; therefore, they are not included in the figure.”

DEIS page 4.5-21 documents that the project area is not visible from the two Incline beaches or other recreational areas to the west. Therefore, no additional analysis of recreational resources is required.

“As discussed under Scenic Recreation Units 7 and 8, the project site is not visible from area beaches located to the east because of the distance between the beaches and the project area. From the west, the project site is not visible from the lake or SR 28 due to intervening topography and vegetation located on Stateline Point.”