

February 9, 2023



4020 Civic Center Drive
San Rafael, CA 94903-4173

Subject: Section 106 review for Skate Park Removal, Black Acacia Tree Removal, and Temporary Storage Projects at Golden Gate Village

Dear Consulting Parties:

You have previously expressed an interest in consulting on proposed undertakings related to Golden Gate Village (GGV). As you know, GGV is listed in the National Register of Historic Places. It is, therefore, a historic property for the purpose of Section 106 of the National Historic Preservation Act (Section 106).

In April 2022, Marin Housing Authority (MHA) removed six temporary skate park ramps occupying a tennis court in the recreational cluster at GGV. In May 2022, MHA removed a mature black acacia tree (acacia melanoxylon) that abruptly partially fell due to advanced trunk rot and fungus, requiring an emergency intervention. Finally, in October 2022, MHA proposed granting permission for a GGV-based non-profit organization, All Our Children United, and their contractor to temporarily occupy one "Staff" parking space in Lot 100 for a 12-foot by 8-foot POD-style storage container for five weeks. MHA concluded that these undertakings did not cause an adverse effect on the historic property. Detailed analyses supporting these conclusions are provided in the attached Finding of Effect Memorandums (FOEs).

With the assistance of its Secretary of the Interior Standards (SOIS)-qualified consultant, MHA has assessed the undertakings at GGV to determine their potential for adverse effect through the application of the Criteria of Adverse Effect (36 CFR 800.5(1)).

These findings are being issued for consulting party comment at this time. We request your written comment within 30 days of posting via email to the following address:

ggvpubliccomment@marincounty.org.

Sincerely,



Michael Cutchin
MHA

Enclosures

Finding of Effect
Memorandums

Housing Authority of
The County of Marin

415/491-2525

(FAX) 415/472-2186
(TDD) 1-800-735-2929

www.marinhousing.org

Memorandum for the File

By: Marin Housing Authority

Date: October 14, 2022

RE: Decision Regarding Skate Park Ramp Removal (Retroactive)

MHA removed six temporary Skate Park ramps from Golden Gate Village near 101 Donahue in April 2022 (see Attachment A Scope Memo for additional details and Attachment B for Skate Park Removal Plan diagram). This memo provides administrative recordation (retroactively) of the decision that the action had no potential to affect the historic property and that no further environmental review is necessary.

Based on the 2019 Character-Defining Feature Study, the Recreational Area Cluster at the northernmost boundary of Golden Gate Village experienced two substantive redesigns over the life of the property. In 1974, a basketball and tennis court replaced the original baseball diamond. In 1992, coinciding with the realignment of Donahue Road, the recreational courts were relocated south of their original location, the play area was reimagined to its current layout (with new play structures, picnic tables, trash cans, barbeque pits, and circulation features), and the tennis court was overlaid with skate park ramps. The Character-Defining Feature Study states that while the historic land use and location of the Recreational Area Cluster remains intact, the Recreational Area Cluster lacks integrity of design and spatial organization due to the alterations done after the period of significance. The Character-Defining Feature Study concluded that the 1992 skate park ramps did not constitute a character-defining feature of the historic district (ICF 2019:4-4 – 4-6, 5-11 – 5-12). The 2017 National Register nomination form notes that this play area had been altered, including the removal of original benches for the addition of grouped seating areas with tables and child play structures as well as previously open areas that were filled with modular paving.

Additionally, the original large playground area on the northernmost end of the campus was completely redeveloped with the installation of the basketball court and tennis court. The National Register nomination form does not identify the existing Recreational Area Cluster or skate park as character-defining features or contributing elements of the historic district (Ruark 2017).

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Therefore, in April 2022 the County had determined that the removal of the skate park ramps did not affect the integrity of the historic property under Section 106 of the National Historic Preservation Act. This decision is dependent on the understanding that the scope of work would not change, add additional features, or make other alterations to the property as part of this project.

References:

ICF. 2019. Character-Defining Feature Study. Golden Gate Village, Marin City, CA. September. San Francisco, CA. Prepared for Marin Housing Authority, San Rafael, CA.

Ruark, Daniel. 2017. National Register of Historic Places Nomination for Marin City Public Housing. National Register Information System Identification 100001604.

ATTACHMENT A

Lattig, Jesse

From: Michael Cutchin <mcutchin@marinhousing.org>
Sent: Wednesday, April 20, 2022 09:09
To: Lattig, Jesse
Cc: Thor Kaslofsky; Kimberly Carroll; Lassell, Susan
Subject: Golden Gate Village skate park project
Attachments: MHA GGV Skate Park Ramp Removal Plan.pdf

Jesse -

Marin Housing Authority is planning to have the approximately 6 Skate Park temporary/removable ramps at Golden Gate Village (near 101 Donahue) dismantled and removed starting this coming **Friday, April 22, 2022** see attached Skate Park Site Map.

We understand that these ramp structures are not a character-defining feature of Golden Gate Village. This project will only remove the skate ramps and will not include installation of any additional items. The area will be left in the state that it was prior to the placement of the skate ramps (as a tennis court) and it will retain its recreational use. Further, this project will not introduce any new features or change the size of the existing pavement that could be incompatible with the surrounding historic site, including the landscape.

The ICF Character-Defining Feature Study (pages 5-11) outlines the Skate Park location's evolution and why it is not a historic feature:

5.4.2.3 Recreational Area Cluster: The original large playground area on the northernmost end of the campus has been redesigned twice since the historic period, but it continues to function overall as a recreational space. The first major alteration occurred in 1974 when the baseball diamond was replaced with a basketball court and a tennis court. The second alteration occurred in 1992 when Donahue Road was realigned and absorbed a portion of Golden Gate Village. In 1992, the recreation courts were relocated slightly south, and the play area was redesigned to its current layout with new play structures and new circulation features. Picnic tables, trash cans, and barbeque pits were also placed in the cluster. The trees and other vegetation throughout the recreation cluster were also changed at this time, including the installation of a compatible row of trees at the edge of the property along Donahue Road. Another alteration after 1992 replaced the tennis court with a skatepark.

Although the historic land use and location are extant, the design and spatial organization of the cluster no longer represent the historic condition due to a series of major renovations to the recreational area that altered the spatial arrangement, small-scale features, and circulation.

We are including the Marin CDA team on this inquiry to expedite the communications on this project. Again, we would like to begin the work this **Friday, April 22, 2022** when the Play Marin team will mobilize its workforce.

Please let me know if you have any questions or concerns. I look forward to your response, thank you.

Highway 101

Donahue



Drake Ave

Figure 1 2022 Google Maps aerial. Squares and ovals show the locations of removed Skate Park ramps. Google Maps 2022 (base map); Polygons and street names added by MHA 2022.



Finding of Effect Memorandum

To:	Tammy Taylor, CDA; Molly Kron, CDA
From:	Michael Cutchin, MHA; Adrian Chorley, MHA
Date:	October 27, 2022
Re:	Black Acacia Tree Removal

Prepared by ICF at the request of Marin Housing Authority in partial fulfillment of Section 106 Review requirements.

PROJECT OVERVIEW

Historic Property: Golden Gate Village
Project Name: Black Acacia Tree Removal
Street Address: Administration Office, 429 Drake Avenue, Marin City
Project Applicant: Marin Housing Authority; County of Marin
Lead Agency: County of Marin, on behalf of the Department of Housing and Urban Development
Contact: Michael Cutchin, Marin Housing Authority

Project Documents Reviewed:

- 1958 Landscape Planting Plans for the Housing Authority of the County of Marin, Marin City, prepared by Lawrence Halprin, John Carl Warnecke, and Aaron G. Green.
- 1974 Landscape Planting Plans for the Housing Authority of County of Marin, Marin City, prepared by Crawford & Banning Architects and Richard Julin & Associates Landscape Architects.
- 2017 National Register of Historic Places Registration Form, prepared by Daniel Ruark.
- 2019 Character-Defining Feature Study, prepared by ICF.
- Arborist Report, prepared by Clements Tree Service, dated May 25, 2022.

ICF is conducting a retroactive review of the undertaking at the above-referenced address under Section 106 of the National Historic Preservation Act (NHPA). On May 25, 2022, Marin Housing Authority (MHA) removed a mature black acacia tree (acacia melanoxylon) that abruptly partially

collapsed due to advanced trunk rot and fungus. One of the tree's three major trunks broke, compromising the remaining portions and creating an immediate health and safety hazard requiring an emergency intervention. The tree was in an area of public circulation along a walkway leading to the Administration Building at 429 Drake Avenue from the adjacent parking lot.

The subject property known as Golden Gate Village (GGV) at 101-429 Drake Avenue & 1-99 Cole Drive in Marin City is a Historic District listed in the National Register of Historic Places. Therefore, the property is considered a historic property for the purposes of Section 106 and the undertaking must be reviewed for conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards).

Acting as MHA's Historic Preservation Consultant, ICF is conducting this retroactive Section 106 review. The purpose of this Finding of Effect (FOE) Memorandum is to determine what effects, if any, the undertaking had on the identified Historic Property in the Area of Potential Effect.

AREA OF POTENTIAL EFFECT

The subject undertaking removed a black acacia tree located adjacent to the parking lot servicing the Administration building at 429 Drake Avenue. Lawrence Halprin's 1958 landscape plan specifies a Siberian Elm tree at this location and called for black acacia trees planted in clusters at defined locations elsewhere on the property. Both the 2019 Character-Defining Feature Study and the 2017 Nomination form emphasize how the landscapes, buildings, open spaces, and their spatial relationships contribute to the historical significance of Golden Gate Village. To fully evaluate direct and indirect effects of this undertaking, the Area of Potential Effect considers the full boundary of the entire historic district.

DESCRIPTION OF HISTORIC PROPERTY

GGV is located at 101-429 Drake Avenue and 1-99 Cole Drive in Marin City, California. The architects Aaron Green and John Carl Warnecke and landscape architect Lawrence Halprin designed the residential complex in ca. 1955-60. On August 3, 2017, the property was listed in the NRHP as the Marin City Public Housing Historic District as historically significant under the areas of social history, community planning and development, architecture, and landscape architecture. The NRHP nomination is available online at California's Office of Historic Preservation website. Quoting the NRHP Nomination:

Marin City Public Housing is eligible for listing on the National Register of Historic Places at the local level of significance under Criterion A in the areas of Social History and Community Planning and Development as a product of post-WWII urban development in Northern California, and under Criterion C in the areas of Architecture and Landscape Architecture, for its association with three prominent mid-century designers: Architects John Carl Warnecke and Aaron G. Green, and Landscape Architect Lawrence Halprin. The period of significance is 1955 to 1960, representing a span of events beginning with County Supervisor Vera Schultz' lead role in acquiring the land for redevelopment as a permanent community—particularly for low-income

workers who lost their jobs at the close of the Marinship shipyard—through Master Planning for the new community by County Planning Director Mary Summers and her department, the selection of Architects John Carl Warnecke and Aaron G. Green as associated architects for the design of the 300 unit low-rent housing project, the design and approval process for the project, and construction (Ruark 2017:Section 8, Page 15).

Per the NRHP nomination form, the historic district includes 29 contributing buildings and one contributing site, a historic landscape designed by Halprin that includes vegetation, circulation, topographic, and constructed water features.

SCOPE OF WORK

MHA removed one black acacia tree located in front the Administration building at 429 Drake Avenue on May 25, 2022, adjacent to the building's parking area. The tree was a mature black acacia (*acacia melanoxylon*) measuring 41 inches in diameter at breast height. According to the arborist's report prepared by Clements Tree Service, the company performing the tree removal (Rivera 2022):

The tree splits into multiple trunks (3) at approximately 13 feet above the ground. One of the three major trunks broke out, smashing the railing, sign, etc. below. The portion that remains is now heavily compromised and is a major hazard. This tree could fail at any moment and needs to be removed immediately. There is no saving this tree. The trunk rot that caused the failure of this tree was accelerated by fungus. Fruiting bodies (such as fungal growth and lichen) are evident on the side of the tree (see Photo 1 and 2 below). This is not an abnormal situation, but one that plagues many trees of this age.



Photo 1 Evidence of white fungal growth in one of the rotted areas of the tree. Source: MHA, 2022.
Notations by ICF. 2023.



Photo 2 Evidence of white fungal growth along the broken segment of trunk of the tree after initial clearing of the limbs. Source: MHA, 2022. Notations by ICF. 2023.

To ensure public safety, MHA removed the black acacia tree. As of this FOE's writing, MHA has not yet proposed planting any replacement tree in the same location. The area was graded during the construction of Golden Gate Village and no archaeological resources were disturbed because of this undertaking.



Figure 1. This figure depicts the location of the black acacia tree southeast of the Administration Building prior to its removal. Source: MHA, 2022. Notations by ICF, 2022.

PROJECT ANALYSIS

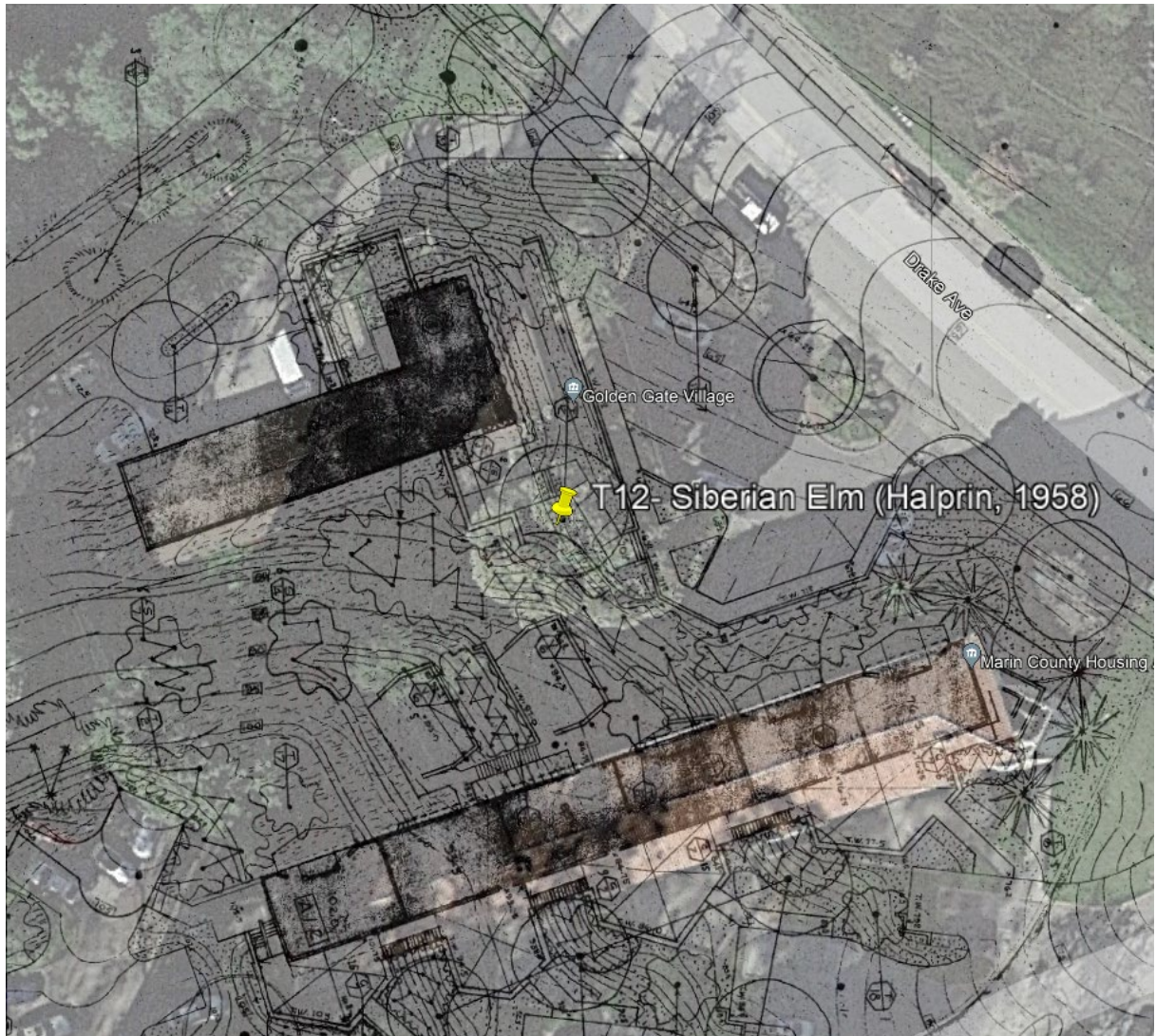
In 2019, MHA hired a Secretary of the Interior’s Standards-qualified Historic Preservation Consultant to draft a Character-Defining Feature Study of the historic property at Golden Gate Village to provide additional information about the landscape features of the historic district. The study included a chronology of the physical development of the property and evaluated and categorized the physical features present at the property as contributing or non-contributing features within the historic district. The purpose of this study was to supplement the 2017 National Register nomination prepared for Golden Gate Village to provide the level of detail necessary to conduct Section 106 reviews for undertakings at the property. The study followed best practices in cultural landscape identification and analysis as outlined by the National Park Service.

The Character-Defining Features Study noted that Lawrence Halprin’s original (1958) planting plans for the site “included 19 species of deciduous and coniferous trees and presented a unified program of tree plantings around the property’s edges, at entrances, along the roadways and parking areas, and within the residential core of the campus” (MHA 2019:5-29). The study says that several species, including black acacia, were clustered along the property’s west, south, and eastern boundaries to provide “a buffer between the more manicured residential areas and the undeveloped

and natural open space in the adjacent Marin Headlands and along the eastern boundary of U.S. Highway 101. These groupings were located along the back slope behind the Service Road, in groupings of five and three along the slope of U.S. Highway 101, and in a small grouping around the play structure between Building 69 and Building 59” (MHA 2019:5-30—5-31).

The 2019 study further notes that Halprin’s 1958 plans for the site did not reflect the immediate as-built condition; in the 1950s and 1960s, only “a minimal number of trees were planted in the high-rise cluster.” However, “a large planting project was undertaken in 1974 that was influenced by Halprin’s design in plant selection and plant layout yet differed enough in both aspects that it cannot be said that the 1974 plan was the full manifestation of Halprin’s design” (MHA 2019:5-33). Crawford & Banning Architects and Richard Julin & Associates Landscape Architects (Julin plan) designed the 1974 plan. While in the spirit of the original 1958 landscape plan, the construction of the Julin plan is outside the period of significance.

The 2019 study concludes that groupings of ornamental trees, shrubs, and perennials surrounding the Administration Building area’s parking lot and within the parking lot island are non-character-defining features of the district (MHA 2019:5-36). Additionally, while the 2019 study mentions black acacia trees as being among those species grouped in clustering patterns in Halprin’s 1958 plan along the slopes of the property boundaries west, south, and east of the project site, lone plantings between the high-rise buildings and the Administration Building are not character-defining features. The use and planting of black acacia as isolated plantings, including at the undertaking’s location, was the result of Julin and Associates’ 1974 Planting Plan (MHA 2019:5-33).



**Figure 2. This figure overlays Lawrence Halprin’s 1958 plan with a 2022 aerial image. Halprin’s plan called for a Siberian Elm tree at the subject location, noted by the “T-12” designation (see plant list below)
Source: Google Earth (base aerial), MHA (Halprin overlay), with annotations by ICF. 2022.**

T R E E S

T-1	GREVILLEA ROBUSTA	SILK OAK
T-2	ACACIA LATIFOLIA	EVERBLOOMING ACACIA
T-3	ACACIA MELANOXYLON	BLACK ACACIA
T-5	EUCALYPTUS FICIFOLIA	RED FLOWERING GUM
T-6	PINUS RADIATA	MONTEREY PINE
T-8	SEQUOIA SEMPERVIRENS	REDWOOD
T-9	CUPRESSUS MACROCARPA	MONTEREY CYPRESS
T-10	ALBIZZIA LOPHANTHA	PLUME ALBIZZIA
T-11	POPULUS NIGRA ITALICA	LOMBARDY POPLAR
T-12	ULMUS PARVIFOLIA	SIBERIAN ELM
T-13	PLATANUS ACERIFOLIA	SYCAMORE
T-14	FRAXINUS VELUTINA GLABRA	MODESTO ASH
T-15	LIQUIDAMBAR STYRACIFLUA	LIQUIDAMBAR

APPLICATION OF THE CRITERIA OF ADVERSE EFFECT

The framework for assessing adverse effects from an undertaking on a historic property is provided in Section 106 of the NHPA, 36 CFR 800.5 and the Criteria of Adverse Effect are identified in 36 C.F.R. 800.5(1). An adverse effect is found when a project may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the project that may occur later in time, be farther removed in distance, or be cumulative.

In addition to the Criteria of Adverse Effect, 36 C.F.R. 800.5(2) includes a series of examples of adverse effects. Examples of adverse effects on historic properties in the regulations include, but are not limited to:

- (i) Physical destruction of or damage to all or part of the property;
- (ii) Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the Secretary's standards for the treatment of historic properties (36 CFR part 68) and applicable guidelines;
- (iii) Removal of the property from its historic location;
- (iv) Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;
- (v) Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features;
- (vi) Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and

- (vii) Transfer, lease, or sale of property out of federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

The project Criteria of Adverse Effect and examples of adverse effects are applied to the historic property. The project would only remove one non-character-defining tree, so it would not damage or destroy the integrity of the property (example i). The project would not alter the property, so conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (Secretary's Standards) is not applicable (example ii). The historic property would not be moved from its location (example iii). While the project would cause a change of the setting within the historic district boundaries, those changes are better analyzed within the context of the Secretary's Standards (example iv). The historic property will maintain its current use (example iv). The undertaking did not introduce visual, atmospheric, or audible elements that diminished the integrity of the property's significant historic features (example v). The property would not be neglected as part of the project (example vi) nor would it be sold, transferred or leased out of federal ownership or control (example vii).

While not part of the project, should the tree be replaced, so long as it is replaced in kind with a black acacia tree or the originally planned Siberian elm, the planting of a new tree would not adversely affect the historic property.

In conclusion, the emergency removal of the black acacia tree did not adversely affect the historic property.

REFERENCES

Google Earth

- 2022 Historical aerial photograph. Available: <https://www.google.com/earth/versions/>. Accessed: October 18, 2022.

Marin Housing Authority (MHA)

- 2019 *Character-Defining Feature Study for Golden Gate Village, Marin City, CA*. Final. September. San Rafael, CA. Prepared by ICF, San Francisco, CA.
- N.D. Construction documents located in MHA's onsite archives, including 1958 and 1974 landscape plans.

National Park Service

- N.D. "Replacing Trees in Cultural Landscapes." *Clippings: Concepts and Techniques for Maintaining Cultural Landscapes*. Available: <https://irma.nps.gov/DataStore/DownloadFile/561516>. October 18, 2022.

Rivera, David

- 2022 Arborist Report 429 Drake Avenue. Clements Tree Service. May 25.

Ruark, Daniel

2017 National Register Nomination for Golden Gate Village. U.S. Department of the Interior, National Park Service. Draft. March.

Memorandum for the File

By: Marin Housing Authority

Date: October 21, 2022

RE: Decision Regarding Temporary Storage Container

MHA proposes allowing a non-profit organization based at Golden Gate Village and their contractor to temporarily occupy one “Staff” parking space in the 100 Lot of Golden Gate Village with a 12-foot by 8-foot by 8-foot POD-style storage container for a period of approximately five weeks (See Attachment A for activity location).

Based on the 2019 Character-Defining Feature Study, the northernmost low-rise unit was renovated for commercial use in 1985 and included ADA-compliant parking alterations to the nearby 100 Lot. In 1993 additional parking stalls, ramps, crosswalks, and speed bumps were added across Golden Gate Village. The Study concluded that the interspersed shared areas, including the courtyards, terraces, parking, and play areas across the property and the five triangle-shaped parking lots with center vegetated islands constituted character-defining features of the district (ICF 2019:5-6, 5-27). These parking areas have received utilitarian upgrades and modifications over the life of the property but “retain their historic materiality or have been replaced with in-kind or compatible materials” such that their integrity remains intact (ICF 2019:6-4). The 2017 National Register nomination form notes that the parking lots remain essentially intact and unchanged. As a “contributing site,” the parking areas are called out alongside the spatial layout of the courtyards and common spaces as forming a “meticulously studied and planned” campus that remain true to the original plans (Ruark 2017).

The County has determined that the proposed activity at Lot 100 is temporary and as scoped has no potential of altering, damaging, or destroying any of the character-defining features of the historic property. The proposed activity would result in no new, permanent additions or alterations to the historic property. Therefore, the County has determined that a temporary storage container occupying one “Staff” parking space in Lot 100 would not affect the integrity of the historic property under Section 106 of the National Historic Preservation Act. This decision is dependent on the understanding that the scope of work would not change, add additional features, or make other alterations to the property as part of this project.

This memo provides administrative recordation of this decision and no further environmental review is necessary.

References:

ICF. 2019. Character-Defining Feature Study. Golden Gate Village, Marin City, CA. September. San Francisco, CA. Prepared for Marin Housing Authority, San Rafael, CA.

Ruark, Daniel. 2017. National Register of Historic Places Nomination for Marin City Public Housing. National Register Information System Identification 100001604.

ATTACHMENT A



Figure 1 Proposed activity uses one "Staff" parking space at this parking lot for a period of approximately five weeks. Base Map: Google Earth 2022. Annotation by ICF 2022.