February 22, 2021

Re: Golden Gate Village, Fire Repairs at 115 Drake Section 106 Closing Letter

Dear Interested Parties:

The intent of this letter is to state that the Section 106 process regarding the Fire Repairs at 115 Drake undertaking at Golden Gate Village (GGV) has been concluded. We have included a summary of the consultation process and comments below.

Summary of Consultation Process

On behalf of the United States Department of Housing and Urban Development, the County of Marin (the County) initiated Section 106 review under the National Historic Preservation Act (NHPA), as amended for maintenance and repair projects at Golden Gate Village. The property was listed in the National Register of Historic Places on August 3, 2017 and is therefore considered a historic property for the purposes of Section 106. In Fall 2019, Section 106 consultation was initiated with Consulting Parties and Tribal Parties. Following initiation, the 115 Drake Avenue Repair Finding of Effect (FOE) Memorandum was sent to participating Consulting Parties and Tribal Parties in August 2020.

In Fall 2020, the County of Marin received concerns from multiple parties and from the general public that they did not receive the original invitation to consult or the FOE memorandum. Therefore, in October 2020, packets with an updated invitation to consult under Section 106 and the FOE memorandum on the proposed undertaking was resent to Consulting Parties via certified mail. The FOE memorandum was also posted on the County’s website for public viewing (available here: https://www.marincounty.org/depts/cd/divisions/federal-grants). Because the Section 106 process was reopened, the comment period was extended through October 30, 2020.

The proposed undertaking will include mostly interior repairs at 115 Drake after damage sustained from a fire in April 2020. The repairs will be primarily located at the building’s north end, near GGV’s north boundary, and at the primary façade at the northwest corner, near the play area to the west, and at the rear façade at the northeast corner near the landscaped slope adjacent to U.S. Highway 101 to the east. Because the fire did not damage the first floor, all work will be limited to the second story and roof, and no ground disturbance will occur as a result of this undertaking. A more precise overview of the repair work to be conducted was included in the FOE memorandum. The analysis outlined in the FOE memorandum resulted in a finding No Adverse Effect under Section 106. This finding was submitted to the State Historic Preservation Office (SHPO) on December 16, 2020 and as of February 12, 2021, no response from SHPO has been issued. Pursuant to Section 106 of the NHPA, 36 Code of Federal Regulations 800.3(c)(4), if the SHPO does not respond within 30 days of receipt of a request for review, the agency may assume concurrence and proceed with the next steps of the process. As the SHPO did not respond within 30 days to this undertaking, MHA is assuming concurrence with the FOE and may proceed without additional consultation.
Consulting Parties
The following organizations were invited to consult under Section 106 on proposed repair and maintenance undertakings at Golden Gate Village: Aaron G. Green Associates, Inc.; California Historical Society; Docomomo, Northern California Chapter; Golden Gate Village Residents Council; Historic American Landscape Survey (HALS), Northern California Chapter; Marin City Community Services District; Marin County Free Library; the Marin History Museum; Sierra Club, Northern California Chapter; Federated Indians of Graton Rancheria, California; Guidiville Indian Rancheria; and Ione Band of Miwok Indians of California. This invitation to consult on repair and maintenance undertakings is limited to projects that are considered minor in nature and are not likely to result in adverse effects. Section 106 review for any major projects at Golden Gate Village will be initiated under separate cover.

The following table represents the list of Consulting and Tribal Parties that responded to the invitation to consult and opted to participate in the Section 106 process for repair and maintenance projects at Golden Gate Village.

Table 1: Consulting Parties Who Responded to Invitation to Consult under Section 106

<table>
<thead>
<tr>
<th>Consulting Party</th>
<th>Tribal Party</th>
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<tbody>
<tr>
<td>Golden Gate Village Resident Council</td>
<td>The Federated Indians of Graton Rancheria (California)</td>
</tr>
<tr>
<td>Marin City Community Services District</td>
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<tr>
<td>Sierra Club, Northern California Chapter</td>
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<tr>
<td>Daniel Ruark, Architect</td>
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<tr>
<td>Ora Hathaway, Member of the Public</td>
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During the October 2020 extended comment period, comments were received from participating Consulting Parities. The following table consolidates and summarizes comments received regarding the Fire Repairs at 115 Drake undertaking that pertain to the potential for effects to the historic property. Comments that are outside the scope of Section 106 review are not summarized in this letter.

Table 2: Comments Summary

| Organization: Sierra Club, Northern California Chapter | Summary of Comments Received: FOE memorandum for Fire Repairs at 115 Drake was not included in consultation package | Date received/Comment format: October 26, 2020/email; October 29, 2020/email | Response: MHA regrets this oversight. The FOE document was re-issued with a new consultation period and posted on the County’s website on September 30, 2020. |
All consulting parties were re-notified at this time that the document was available.

| Daniel Ruark, Architect | • Request that Fall 2019 FOE be resubmitted  
|  | • New response period to end on October 30, 2020  
|  | October 1, 2020 / email  
| The Section 106 process was reopened, and the comment period was extended through October 30, 2020.  

| Ora Hathaway, member of the public | • MHA should repair 115 Drake as soon as possible  
|  | • Replace materials in-kind or with “equal or better” to meet green building standards  
|  | • Remain true to the exterior historic façade of the building as-designed  
|  | • Interior may be new as long as the outside design is preserved  
|  | • Work should be completed by Daniel Ruark  
| October 30, 2020 / email  
| MHA intends to begin work on 115 Drake as soon as the Section 106 process is complete.  

All building permits are required to comply with the CA State Building Code requirements and green building standards as applicable. In-kind repair uses materials of the same type, design, dimension, texture, detailing, and exterior appearance. The Secretary of the Interior's Standards for Rehabilitation, Guidelines for Rehabilitating Historic Buildings calls for repairs to be carried out with in-kind, or with compatible substitute material. For replacement, in-kind is preferred. Caution is recommended in choosing “or better” materials meeting green building standards to ensure there is no adverse effect to the property.

Repairs to 115 Drake will largely be interior, however, both interior and exterior repairs were found to be in compliance with the Secretary of the Interior's Standards for Rehabilitation and no adverse effect was found and historic character will be retained.

A professional meeting the Secretary of the Interior's...
Professional Qualifications Standards will conduct the work, we are unable to recommend specific consultants be hired under this process.

After considering the full scope of the enclosed comments, including those summarized above, the County has determined that the FOE sufficiently documents and analyzes the potential for adverse effects. This letter presents a final finding of *No Adverse Effect* in order to formally conclude Section 106 consultation with regards to this undertaking.

Documents relating to this review process are available on both the Marin Housing Authority and County of Marin websites. Tammy Taylor, Planner for the County of Marin, coordinates the Section 106 review process for the property. You may contact her at ggvpubliccomment@marincounty.org with questions about this process.

Sincerely,

**Evan Smith**

Evan Smith
Marin Housing Authority