

# **FINDING OF EFFECT MEMORANDUM**

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

**March 27, 2020**

## **I. PROJECT OVERVIEW**

**Historic Property:** Golden Gate Village  
**Project Name:** Temporary Onsite Modular Office  
**Street Address:** 101–429 Drake Avenue and 1–99 Cole Drive, Marin City  
**Project Applicant:** Marin Housing Authority, County of Marin  
**Lead Agency:** County of Marin  
**Contact:** Evan Smith, esmith@marinhousing.org

### **Project Documents Reviewed:**

- GGV landscape plans with plant list, Lawrence Halprin, 1958
- GGV Lawn Sprinkler System plan, Wilsy, Ham & Blair, 1965
- GGV landscape plans with plant list, Richard Julin & Associates, 1974
- GGV Site Improvement plans, OMI Lang Associates, 1984
- Draft National Register Nomination for Golden Gate Village, 2017
- NWIC Records Search for Golden Gate Village, 2019
- Character-Defining Feature Study for Golden Gate Village, 2019
- Willscot 64' x 12' Mobile Office Trailer spec sheet, 2019

ICF is conducting a review of a proposed undertaking at the above-referenced property under Section 106 of the National Historic Preservation Act, as amended. The Marin Housing Authority (MHA) is proposing to use federal funds to install one temporary modular unit onsite to be used for a community space to serve the tenants and the tenant council. Acting as the historic preservation consultant for MHA, ICF prepared this Finding of Effect Memorandum as part of its role in supporting MHA to carry out Section 106 review of the property.

The subject property, known as Golden Gate Village (GGV), was listed as a historic district on the National Register of Historic Places (NRHP) in 2017. 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*. The purpose of this Finding of Effect Memorandum is to determine what effects, if any, the proposed undertaking would have on the identified historic property in the Area of Potential Effect.

In summary, the installation of a temporary modular unit on the lawn west of Building E5 would constitute a *conditional no adverse effect* on the historic property. The proposed scope of work is analyzed in this memorandum.

## **II. AREA OF POTENTIAL EFFECTS**

The Area of Potential Effects (APE) is the geographic area within which an undertaking may directly or indirectly cause alterations to the character of a historic property. Because the proposed scope of work would involve the temporary placement of one new modular unit onsite that will be visible from various locations throughout the property, the APE for this undertaking is defined as the entire 29.8-acre site, which is the identified boundary of the NRHP-listed historic district.

### **III. DESCRIPTION OF HISTORIC PROPERTY**

Golden Gate Village (formerly Marin City Public Housing Complex) is located at 101–429 Drake Avenue and 1–99 Cole Drive in Marin City, California. The complex was listed on the NRHP as a historic district in 2017, at the local level of significance under Criteria A and C with a period of significance that spans 1955–1960. The property is listed under Criterion A (events) 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 (design) 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. Per the NRHP nomination form, the historic district includes 29 contributing buildings and 1 site, a historic landscape designed by Halprin.<sup>1</sup>

The 2017 NRHP nomination documentation for GGV did not include a thorough analysis of the individual elements of the identified historic district and assumed that all elements of the property contribute to the significance of the district. Archival research and field survey indicate that some of the features of the district have been modified over time or are no longer extant. Furthermore, the documentation did not fully address the cultural landscape as part of the historic design.

MHA retained ICF to perform a Character-Defining Feature Study of the 29.8-acre Golden Gate Village historic property in 2019. The objective of the study was to refine the understanding of the historic features of the property. Character-defining features date to the property's period of significance and continue to convey the property's eligibility as a historic property. Non-character-defining features do not date to the property's period of significance and do not contribute to the historic district's eligibility as a resource.

The September 2019 Final Character-Defining Feature study organizes the historic and existing features of the property into landscape characteristics according to National Park Service guidance for evaluating the NRHP eligibility of cultural landscapes. Landscape characteristics provide a framework to evaluate and understand the human influence on the landscape and measure historic integrity (Page et al. 2009). Both the historic and current appearance of the cultural landscape is a unique combination of landscape characteristics that are the tangible evidence of the historic and current uses of the land (NPS Park Cultural Landscapes Program

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<sup>1</sup> The National Register nomination for Golden Gate Village is too large of a file to attach to this memo, but it can be viewed online at the SHPO's website:

[http://ohp.parks.ca.gov/pages/1067/files/CA\\_Marin%20County\\_Marin%20City%20Public%20Housing\\_Draft%20Nom.pdf](http://ohp.parks.ca.gov/pages/1067/files/CA_Marin%20County_Marin%20City%20Public%20Housing_Draft%20Nom.pdf)

n.d.).

A description of the property, as it relates to this undertaking, was adapted from the Character-Defining Feature Study and included below. The headers represent the different landscape characteristics that are present at the site.

### ***Spatial Organization***

Golden Gate Village is located in Marin City, near the City of Sausalito in Marin County. It is sited on the eastern end of Marin Peninsula, the approximately 20-mile-long arm of land that divides San Francisco and Richardson Bays on the east, from the Pacific Ocean on the west.

The housing complex was built on 29.8 acres of land formerly used as government housing for the shipbuilding industry during World War II. Following the war and the decline of the local shipbuilding industry, the land was flagged for new use. During the Marin City Redevelopment Project in the 1950s, MHA set aside a horseshoe-shaped lot in the southwest corner of the project area between the Marin Headlands and U.S. Highway 101 to create a public housing development.

The irregularly shaped lot was determined by the natural topography of the site, between the Marin Headlands and Richardson Bay to the west and south, with U.S. Highway 101 to the east and the newly aligned Drake Avenue built for the Marin City Redevelopment to the north. These constraints resulted in the overall spatial organization of Golden Gate Village, divided into the high-rise cluster defined by steep topography and radial-sited buildings, and the low-rise cluster defined by the semi-circular area reflecting the u-shape of Drake Avenue and buildings sited at various orientations.

### ***Circulation***

The historic designed pedestrian circulation through the site was provided by a system of concrete sidewalks along street alignments, concrete sidewalks meandering throughout the entirety of the site, and concrete stairways built into the site's steep topography.

The two types of concrete sidewalks can be seen along the vehicular alignments of Drake Avenue and Cole Drive. The first type (standard sidewalk following street alignment) was found along Cole Drive and Drake Avenue continuing past the site boundaries. A more site-specific sidewalk type was designed to separate the pedestrian realm from the street. This sidewalk type had a wide lawn buffer (a minimum of approximately 20 feet) from the street. This alignment also followed the topography, creating a slightly curvilinear and meandering pathway. This sidewalk type was also found connecting buildings to the first type of sidewalks near the streets, connecting buildings to each other, to the courtyards and parking lots, and was also found encircling low-rise buildings.

Parking areas were irregularly shaped lots with integrated vegetation or parking terraces that were arranged to accommodate both the social life and functional necessities of public housing.

The 1958 site plan included five triangle-shaped parking lots with vegetated islands also shaped in an irregular triangle pattern. Vehicles parked along the outer edge of the triangle-shaped lots and around the center island. Three were located near U.S. Highway 101: one accessed by Cole Drive and two accessed by Drake Avenue, one parking lot serviced the semicircle area, and one serviced the Administration Building.

### ***Vegetation***

The vegetation historically intended for Golden Gate Village was clearly outlined in a plant list and associated planting plans by the project's landscape architect, Lawrence Halprin, in 1958. The planting list separates the plant species into four categories: vines, trees, shrubs, and groundcover (see Appendix C). Each plant was selected for their ability to serve both visual and functional purposes. Halprin assigned each plant a symbol and deliberately sited them within the landscape. The overall landscape design includes the careful grouping of plants to articulate boundaries, accentuate viewsheds, and provide a suburban residential aesthetic.

The 1958 plant list 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.

The existing conditions of the vegetation at Golden Gate Village represent a combination of portions of the original 1958 planting plan that were implemented, portions of planting projects undertaken over time since initial construction in 1959–1961 that correspond to a known planting plan drawing set (1974, 1984), and plantings on site that do not correlate to a known planting project but are known to have been planted after the initial 1959–1961 plantings.

The original design for the landscape at Golden Gate Village included clumps of trees and lawn in the location of the proposed modular unit, although it was not fully implemented. In both a 1974 and 1984 planting plan for the site, London Plane trees (*Platanus acerifolia*) were identified to be planted in a row along Drake Avenue. Again, there is no evidence that these plans were fully implemented. Today, the area for the proposed scope of work includes a manicured (routinely mowed) lawn with a London Plane tree in the northwestern corner.

### ***Buildings & Structures***

The site plan included 29 buildings, 28 of which were multi-unit residential buildings and one that functioned as the Administration Building for MHA. The building styles were reflective of architect Aaron G. Green's architectural philosophy in a way that distinguished them from other contemporary public housing designs. Green had been influenced by the American organic architectural style of his mentor Frank Lloyd Wright, and through his designs attempted to blend the buildings in the study area into the existing natural systems and topography of the property. The naturalistic material and color palettes Green selected for the buildings, and their siting within an irregularly shaped lot that continues to be defined by its natural surroundings, in combination with other landscape and circulation features throughout the site, resulted in what feels like a residential subdevelopment rather than a formal institutional complex.

Buildings at the site are divided into two major categories: high-rises and low-rises. The low-rise buildings are further subdivided into three types plus the Administration Building.

Low-rise buildings were rectangular in plan, one or two stories in height, and contained units that ranged in size between one and four bedrooms. Each unit was designed with individual at-grade entrances and attached private patios or terraces. The three building types contained customized features but shared a common material palette that included concrete masonry units and red-wood siding.

### *Views & Vistas*

The views and vistas of Golden Gate Village borrowed heavily from the natural scenery that surround the property during its construction. The residential complex was sited on a natural slope, which was intentionally graded into flat terraces that descended in a northeastern direction. Scenic views of the surrounding area are evident throughout the site but are most dramatic from the high-rise cluster located at the top of the slope.

Curated view corridors and controlled vistas are also evident in the designed landscape. The arrangement of buildings and other designed features in Golden Gate Village influenced how tenants experienced the campus and provided privacy.

### **Records Search**

ICF submitted a nonconfidential records request in July 2019 to the Northwest Information Center (NWIC) in Rohnert Park, California. The study area for the records search included the approximately 30-acre Golden Gate Village and a 0.25-mile buffer zone. The purpose of the records search was to identify previously recorded cultural resources and studies in or within records search area.

According to the records search at NWIC, between 1978 and 2014, fifteen cultural resource studies were conducted within a 0.25-mile buffer of Golden Gate Village. However, this did not reflect that Golden Gate Village was listed in the NRHP in 2017. No previously recorded archaeological resources were recorded within Golden Gate Village, however, one Native American and historic-period archaeological resource was recorded directly adjacent to the property, and one precontact archaeological resource was identified within the 0.25-mile search buffer (NWIC 2019).

According to the NWIC report's evaluation of the environmental setting, Golden Gate Village "contains bedrock and artificial fill over bay mud and is situated adjacent to the historic bay margins and contains or is adjacent to at least one intermittent drainage," (NWIC 2019). A 1958 preliminary master plan with environmental analysis overlays for Golden Gate Village represents the APE in marshland from a 1942 historic topographic map (Halprin Collection, University of Pennsylvania Architectural Archives 1958). Given that Native American resources in the vicinity of Golden Gate Village have been found in similar environmental settings, as well as the proximity to recorded archaeological resources, NWIC noted in its report that Golden Gate Village has a "high potential for unrecorded Native American resources," (NWIC 2019). Given that the 1897 USGS Mt Talmpais 15-minute topographic quadrangle depicts at least one building

or structure within the Golden Gate Village boundary, NWIC also noted a “high potential for unrecorded historic-period archaeological resources within the Golden Gate Village boundary,” (NWIC 2019).

#### **IV. PROPOSED SCOPE OF WORK**

The proposed scope of work for the undertaking consists of locating one new one-story 64’ x 12’ modular office building with bathroom, totaling 720 square feet, on the existing 0.19-acre lawn area between Building E5 and Drake Avenue.

A small site plan is included on the following page to illustrate the layout of the complex and building names (Figure 1); please reference Attachment 1 for a higher-resolution version of this site plan with apartment numbers. Unit 181 in Building E5 is outlined in red. Unit 181 is located on the southwest corner of Building E5, closest to the proposed location of the modular unit. The modular unit will be placed on the lawn area near the northern parking lot with the same northwest to southeast orientation as Buildings E5, E4, B8, and B9 (Figure 2).

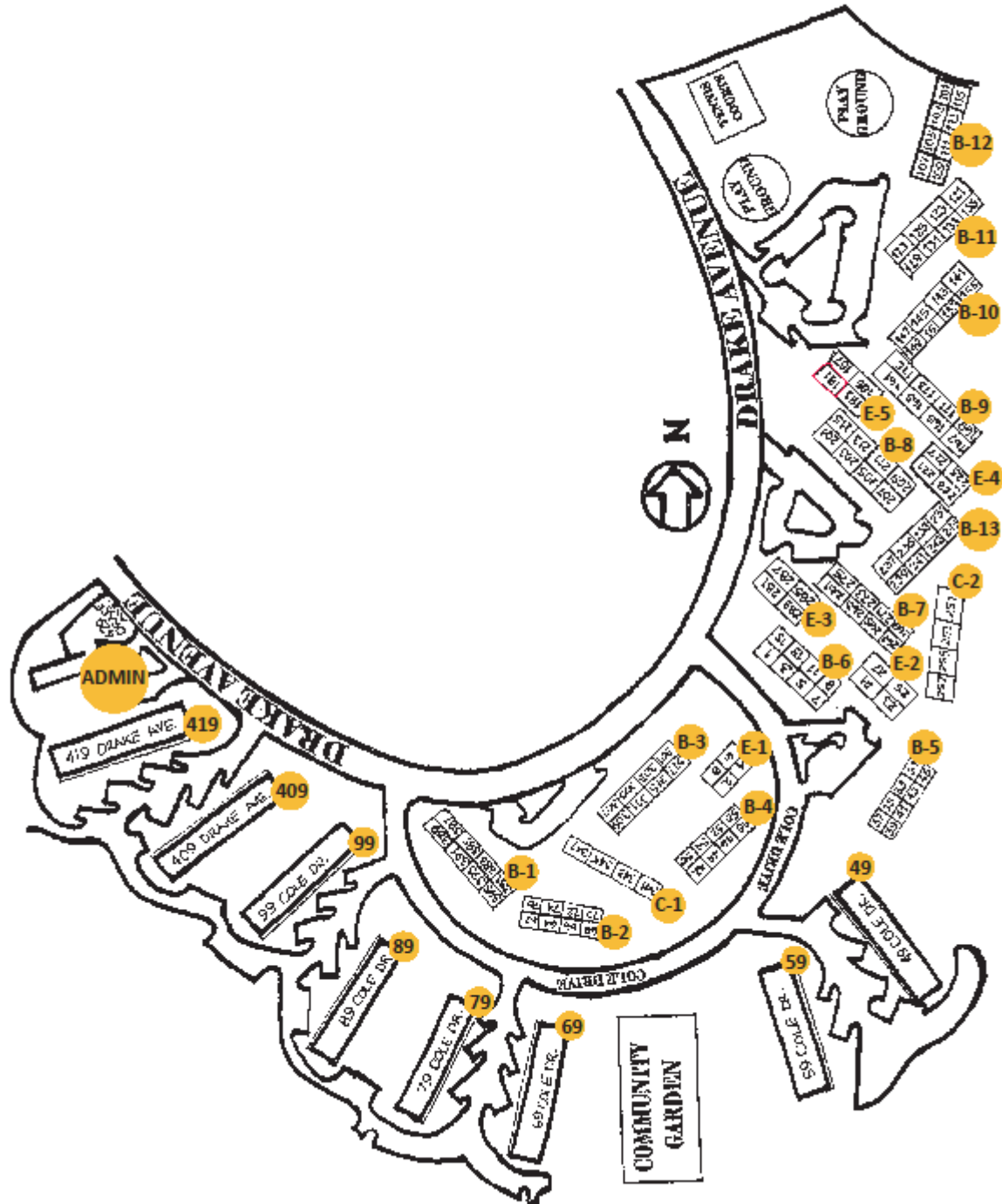


Figure 1: A site plan illustration of Golden Gate Village. North is up, Highway 101 is to the east; not to scale. Courtesy: Marin Housing Authority, with illustration by ICF.



**Figure 2: A site plan illustration of the proposed location and orientation of the 64' x 12' modular unit, shown in red. North is up, Highway 101 is to the east; not to scale. Courtesy: Google Earth, 2019**

The temporary modular unit would be used for a community space to serve the tenants and the tenant council, which currently operates out of an on-site apartment unit. This decision was made in order to re-dedicate the unit where the tenants currently meet as housing, and followed a call that occurred on February 27, 2019 that included representatives of MHA and the Tenants Council where such alternatives were discussed. The unit is anticipated to be onsite for two to three years. Building E5 would function as the power source for the modular unit; electricity for the modular unit would run from an approximately 5-foot metal rod that projects from the end of the roof ridge above Unit 181 of Building E5. Wiring would connect directly with the end of the roof of the modular unit to Building E5, in the shortest distance possible. A bathroom would be contained within the modular unit and regularly pumped.

Following a site investigation by the unit manufacturer, it was determined the ground within the APE is solid enough to support the weight of the unit. The modular unit would be rolled onto the lawn and parked in place (leaving the wheels on the unit). A skirt would be installed over the



wheels. The anticipated height of the unit is 2.5-feet to 3-feet off the ground, with 8-foot ceilings, for a total height of 10.5-feet to 11-feet tall. According to the Willscot manufacturer website, the exterior finish on the unit can be aluminum or wood siding and it has standard drip rail gutters (Willscot.com 2019). The unit has a flat roof and two doors, which will be serviced by one set of steps and one accessible ramp. Ground disturbance is not required for the project.

After no more than three years (which corresponds to the length of the lease MHA will hold on the modular unit), the temporary modular unit will be removed from the landscape at Golden Gate Village. At that time the landscape will be returned to pre-project conditions, including the repair of the lawn area at the project site and the removal of the utilities rod from the roof ridge of building E5.

## **V. PROJECT CONFORMANCE WITH THE SECRETARY OF THE INTERIOR'S STANDARDS FOR THE TREATMENT OF HISTORIC PROPERTIES**

### **EFFECTS ASSESSMENT**

The framework for assessing adverse effects from a proposed undertaking on a historic property is provided in Section 106 of the National Historic Preservation Act, 36 CFR 800.5. An adverse effect on historic properties occurs if the project impairs the characteristics that qualify that property for inclusion in the NRHP. In order for the property to convey its historical significance, it must retain aspects of historic integrity including, location, design, materials, workmanship, feeling, setting, and association. Adverse effects can be avoided, minimized, or mitigated through project conformance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* (Secretary's Standards). The Secretary's Standards are organized into four management strategies or treatment approaches: preservation, restoration, reconstruction, and rehabilitation. The proposed project undertaking falls under the category of rehabilitation, which assumes that there have been and will be changes within the historic property and provides guidance to allow for a compatible contemporary use of the property through alterations and additions, while preserving the character-defining features which convey its historical, cultural, or architectural values.

The following list of character-defining features is excerpted from the Character-Defining Feature Study and includes those features of the district that are located within close proximity to the undertaking and have the greatest potential to be affected. These character-defining features help frame the analysis of potential effects under the proposed undertaking:

#### Spatial Organization:

- The design of the site responding to its topography/location, with taller buildings and structures built into the hilly slopes of the southwest, and shorter buildings and landscaped open spaces located to the northeast closer to Richardson Bay.
- Low-rise buildings oriented in varying directions within three sub-clusters, each quadrilaterally arranged around a courtyard.

#### Land Use:

- Multi-unit residential
- Community gathering spaces.

**Circulation:**

- The materiality and curvilinear design of concrete sidewalks meandering throughout the entirety of the site.
- Five triangle-shaped parking lots with center vegetated islands.

**Vegetation:**

- Lawn groundcover:
  - rough character in high-rise cluster;
  - manicured character in low-rise and recreational area clusters).

**Views and Vistas:**

- Broad views from one end of the campus to the other:
  - Views from the high-rise cluster over the low-rise buildings toward the recreational area cluster.

**Buildings and Structures: Low-Rise Buildings**

- 20 rectangular-plan buildings.
- One or two-story heights.
- End gabled roofs with exposed rafters.
- The clerestory ridge vents at building type B.
- Concrete and wood frame construction.
- Redwood siding with vertical batten at building type B.
- The location of the doors and windows.
- The location of utilities at the gable ends of the buildings.

In determining if the proposed undertaking has the potential to affect the NRHP-listed historic landscape, ICF reviewed the project documents described previously and conducted a site visit to inspect the project APE on November 8, 2019. This memorandum analyzes the proposed scope of work's compliance to the Secretary's Standards for Rehabilitation.

**Secretary's Standards for Rehabilitation**

*1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.*

2. *The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.*
3. *Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.*
4. *Changes to a property that have acquired historic significance in their own right shall be retained and preserved.*
5. *Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.*
6. *Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.*
7. *Chemical or physical treatment, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.*
8. *Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.*
9. *New addition, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.*
10. *New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.*

### **Additional Guidelines and Recommendations**

The Secretary of the Interior also provides *Guidelines for the Treatment of Cultural Landscapes* (the Secretary's Guidelines) to aid property owners and designers in applying the Secretary's Standards to the unique characteristics of cultural landscapes. Three of the Secretary's Guidelines and recommendations are below that are relevant to the proposed scope of work. These recommended guidelines help ensure conformance with the Secretary's Standards.

#### ***A. Identify, Retain, and Preserve historic materials and features***

***Recommended:*** Identifying, retaining and preserving the existing spatial organization and land patterns of the landscape, the historic vegetation, existing buildings, structures, furnishings and objects, and circulation systems as they have evolved over time and prior to project work.

Evaluating the condition and determining the age of historic vegetation, structures, furnishings and objects, and circulation systems.

Retaining the historic relationships between the landscape and its buildings, structures, furnishings and objects.

*B. Protect and maintain historic features and materials*

**Recommended:** Protecting and maintaining features that define spatial organization and land patterns, existing historic vegetation, existing buildings, structures, furnishings and objects, and circulation systems by non-destructive methods in daily, seasonal and cyclical tasks.

*C. Alterations/additions for new use*

**Recommended:** Designing new features when required by the new compatible use to assure the preservation of the historic spatial organization and land patterns.

Designing and installing a new structure, furnishing or object when required by the new use, which is compatible with the preservation of the historic character of the landscape.

**ANALYSIS OF THE UNDERTAKING UNDER THE SECRETARY’S STANDARDS FOR REHABILITATION**

The scope of work, as currently proposed, would comply with the Secretary’s Standards numbers 1, 2, 3, 4, 5, 6, 7, and 8, as discussed below.

*1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.*

**Comment:** Within the extent of the APE, the project constitutes a minimal and temporary change. The modular unit would be used for community shared space, which is a character-defining feature under the “land use” characteristic. While this land use is usually articulated at the property through its outdoor spaces such as in the courtyards, the modular unit would serve as an indoor community space which is consistent with the character-defining features of the property. The addition of an electrical connection on the roof of Building E5 would constitute a minimal and temporary change to the materials and features of the contributing building. Therefore, the undertaking complies with Standard 1.

*2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.*

**Comment:** The project does not remove distinctive materials, or alter any characteristic features, spaces and spatial relationships of the property. The modular will be installed on a temporary basis at the edge of the property, and any features that are altered during the undertaking (such as the potential for the modular unit to damage the lawn groundcover) will be restored to pre-project conditions after the undertaking is complete and the modular has been removed. Furthermore, it will be oriented on the site in a manner that responds to the existing spatial relationships within the landscape. The added electrical connection to Building E5 constitutes a minimal and temporary alteration. Therefore, the undertaking complies with Standard 2.

*3. Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements*

*from other historic properties, will not be undertaken.*

**Comment:** The addition of the modular unit would not create a false sense of historical development. The modular unit is contemporary in character and design and would read as a new feature in the landscape. There are no conjectural elements proposed for the project and the undertaking complies with Standard 3.

4. *Changes to a property that have acquired historic significance in their own right shall be retained and preserved.*

**Comment:** It does not appear that any changes to the historic landscape have acquired any historic significance in their own right. Therefore, the undertaking complies with Standard 4.

5. *Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.*

**Comment:** No distinctive materials, features, finishes, or construction techniques that characterize the lawn area where the modular will be sited or Building E5 would be removed or destroyed as a result of the proposed project. Therefore, the undertaking complies with Standard 5.

6. *Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.*

**Comment:** The purpose of the proposed undertaking is for an additional structure to be added to the landscape for use as a community space for tenants. This does not include the repair or replacement of historic features. Furthermore, when the temporary modular unit is removed from the APE at the conclusion of the undertaking the historic character of the lawn ground cover will be repaired to pre-project conditions. Therefore, the undertaking complies with Standard 6.

7. *Chemical or physical treatment, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.*

**Comment:** There are no plans for chemical or physical treatments to be undertaken on historic materials as part of the proposed undertaking. Therefore, the undertaking complies with Standard 7.

8. *Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.*

**Comment:** Previous archaeological research indicates that no prehistoric or historic-era archaeological sites, features, artifacts, or human remains have been documented within the project APE, yet there is a recorded archaeological site directly adjacent to Golden Gate Village. Because the proposed project site consists of artificial fill from other areas, and given the proximity to recorded archaeological resources and the environmental setting where other Native American resources have been recorded, the APE is archaeologically sensitive. Nonetheless, the proposed scope of work would not include ground disturbance and no archaeological resources would be disturbed as a result of the proposed project. Therefore, the undertaking complies with Standard 8.

The proposed project includes actions that may not comply with the Secretary's Standards numbers 9 and 10. Conditions have been placed on the undertaking to ensure conformance, and are listed below.

*9. New addition, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.*

**Comment:** The proposed undertaking would introduce a new temporary building (one modular unit) within the boundaries of the NRHP-listed historic district between Building E5 and the residential subdivision to the west. The unit would be sited on the lawn between Drake Avenue to the west, between the site's two northern parking lots to its north and south, and Building E5 to the east. The new modular unit would not diminish the existing buildings' historical relationship to each other because the unit would not be located between any of the existing buildings, but rather it would be located on the edge of the property.

Additionally, the new modular unit would not diminish any character-defining views or vistas. Nearby contributing buildings include E5 and several examples of the two-story B low-rise type (Buildings B8, B9, B10, B11). The B type buildings are approximately 23.5-foot tall, and the E type building is approximately 12.5-foot tall. The modular unit would be approximately 10.5-foot to 11-foot tall, which is lower in height than the contributing low-rise buildings. Therefore, the modular unit would not block significant views.

The modular unit would introduce a new visual element into the historic property but would be clearly differentiated from the character-defining buildings and compatible in proportion and spatial relationship to the cultural landscape.

The parking lots on the north and south sides of the lawn where the modular unit would be placed, and the concrete sidewalks surrounding the lawn are character-defining features of the cultural landscape. The proposed undertaking would not alter these features. Furthermore, no character-defining vegetation would be removed for the installation of the modular unit. Where and if the lawn ground-cover is damaged during the project, it will be repaired to pre-project conditions after the undertaking is complete.

**Condition:**

The materiality and appearance of the façade of the modular unit should be compatible with the neighboring contributing buildings. The modular unit manufacturer's website notes the unit can have either wood or aluminum siding. Wood siding painted a neutral color would be compatible with the neighboring contributing buildings.

While no vegetation is anticipated to be removed while the modular unit is onsite, to ensure compatibility with the manicured lawn of the low-rise cluster, the lawn around the unit and underneath the steps and ramp should be properly maintained. This may include weed whacking to maintain a low groundcover.

10. *New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.*

**Comment:** The proposed scope of work notes the temporary modular unit will be onsite for a length of two to three years and an electrical connection will be added to the roof of Building E5. As noted in the scope of work, when the temporary modular unit is removed from the APE the lawn will be repaired to pre-project conditions. If the transport or the placement of the modular unit creates ruts in the lawn, the project sponsor will ensure that the ruts are also properly repaired. The electrical connection will be removed without altering the form or integrity of building E5 or the landscape.

This analysis considers the temporary nature of the modular unit. This length of the lease MHA will hold on the modular unit will expire after three years. If the lease must be renewed at the end of three years for any reason, the Section 106 process will be re-initiated at that time.

**Condition:**

Once the modular unit is removed and the condition of the site is assessed, the ground cover repair methodology may require dethatching the area first, then either replacing the sod, reseeding the area, or using a combination of sod and seed.

**Summary of Analysis**

In summary, the proposed scope of work generally respects the historic character of the existing cultural landscape. The modular unit would be clearly modern in style, smaller in overall size than existing buildings (height, length, and width), and sited at the edge of the cultural landscape rather than in the interior of the site.

The scope of work as currently proposed, however, includes the addition of a new structure that would alter the original spatial organization of the site, and has the potential to damage the lawn groundcover in its immediate vicinity. These pose a potential effect to the historic landscape; thus conditions have been placed on the undertaking in this Finding of Effect Memorandum to ensure the preservation of significant character-defining features of the historic property and compliance with the Standards for Rehabilitation. A summary of conditions are below:

- The materiality and appearance of the façade of the modular unit should be compatible with the neighboring contributing buildings so that the new structure is as unobtrusive as possible to the cultural landscape. The modular unit manufacture’s website notes the unit can have either wood or aluminum siding. Wood siding painted a neutral color (such as tan or light brown) would be compatible with the neighboring contributing buildings.
- While no vegetation is anticipated to be removed while the modular unit is onsite, to ensure compatibility with the manicured lawn of the low-rise cluster during the project, the lawn around the unit and underneath the steps and ramp should be properly maintained. This may include weed whacking to maintain a low groundcover.\
- Once the modular unit is removed and the condition of the site is assessed, the ground cover repair methodology may require dethatching the area first, then either replacing the sod, reseeding the area, or using a combination of sod and seed.

#### IV. FINDING OF EFFECT

ICF has determined that the proposed undertaking would conform to the Secretary of the Interior’s Standards for Rehabilitation and would result in a *conditional no adverse effect* on the identified historic property. The proposed undertaking would not diminish the historic property’s eligibility for the NRHP.

#### V. ATTACHMENTS

1. Marin Housing Authority Site Plan (n.d.)

#### VI. REFERENCES

##### Lawrence Halprin Collection

- 1958 Architectural Archives, University of Pennsylvania. Philadelphia, PA.  
*Various Multiple sketches, notes, by Halprin, and construction drawings for the Marin City Redevelopment Project and from the office of John Carl Warnecke and Aaron Green.*

##### NPS Park Cultural Landscapes Program

- n.d. Landscape Lines 3: Landscape Characteristics. Available:  
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**Finding of Effect Memorandum**

**Golden Gate Village, 101–429 Drake Avenue & 1–99 Cole Drive, Marin City  
November 27, 2019**

