FINDING OF EFFECT MEMORANDUM

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

September 25, 2019

I. PROJECT OVERVIEW

Historic Property: Golden Gate Village

Project Name: Defensible Space Vegetation Removal

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 Evan Smith

Project Documents Reviewed:

• Fire Inspection Report #1 (June 2, 2018)

- Fire Inspection Report #2, (August 7, 2018)
- Fire Inspection Report #3, (August 13, 2018)
- Fire Inspection Report #4, (August 30, 2018)
- GGV landscape plans with plant list, Lawrence Halprin, 1958
- GGV landscape plans with plant list, Richard Julin & Associates, 1974
- Draft National Register Nomination for Golden Gate Village, 2017

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 financially assist with the removal of vegetation from "defensible space" in accordance with current fire safety guidelines. Defensible space is defined as a buffer between buildings and vegetation that is likely to provide fuel during a fire. Acting as the historic preservation consultant for MHA, ICF prepared this Finding of Effect Memorandum as part of its role in supporting MHA carry out Section 106 review of the property.

The subject property, known as Golden Gate Village (GGV), was listed 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 summary, a general recommendation from the Marin County Fire Department (MCFD) to remove debris and overall clutter from the landscape would not pose a potential effect on the historic property. Likewise, five out of nine of the recommendations from the MCDF do not include any actions that have the potential to effect vegetation that was part of the original planting plan or the original design intent. However, the remaining four recommendations include actions that have the potential to effect original plant material or the intention behind the original landscape design; therefore, these recommendations are 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 removal of vegetation and construction staging and pathways at 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.¹

Overall Description

The property is described in the NRHP nomination form as such:

Setting

The southwest property line abuts the Golden Gate National Recreation Area open space. Golden Gate Village can be partially seen by those driving along Highway 101, which forms the eastern border for the property. To the northeast is Richardson Bay, an estuary that joins San Francisco Bay to the south. The layout takes its cues primarily as a response to the sloping aspect of the site rather than organized upon a rigid grid as often a hallmark of typical public housing projects. This less formal arrangement sought to incorporate generous amounts of open space for active social use of the residents and the play activity of children as well as for attractive clusters of permanent landscaping. As well, it preserves the natural features of the site rather than removes or fully builds upon them. As a result, the overall character of the property is very much like a pleasant suburban campus, rather than a grim, dreary housing complex that most tend to associate with public housing. Parking lots, walkways, stairs, and community courtyards remain essentially intact and unchanged. The landscaping of the park-like campus is mostly lush and mature, but has departed from original standards where replacement has occurred and could benefit greatly from being refreshed according to the planting specifications of the Landscape Architect's master plan.

¹

¹ 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 t%20Nom.pdf

Buildings

There are four building types that comprise the housing portion of Golden Gate Village as designated by the associated architects on site and building plans. Type A buildings contain two bedrooms, Type B buildings contain three bedrooms, Type C buildings contain four bedrooms, and Type E buildings contain one bedroom each. Curiously, there is no Type D building and the architects' reason for skipping the letter is unknown. The largest building type, the rectangular Type A, is repeated eight times, and oriented in a vertical manner fanning out from parcel 22 towards the site's hills. Thirteen Type B buildings are staggered in the northern portion of the site, tapering in towards the center of the site. Five Type E buildings anchor brick paved courts that are formed at the rear of several Type B building pairs. Two Type C units are spread out within the site, one towards the center of the easternmost extent and the other situated within Marin County Assessor's parcel 22.

Concrete walkways wrap around buildings, landscaped areas, and the site's contours, connecting the site with pedestrian access. Concrete steps with metal handrails emerge from the hills, leading to concrete and brick courts. Each of the building types feature a concrete porch of some configuration. Cole Drive and Drake Avenue both offer continuous vehicular access through the site, and are lined by raised concrete sidewalks. There are two parking lots towards the northern portion of the site, offering access to Type B and Type E dwellings. Parking for the elongated Type A buildings is organized between building pairs, each façade leading onto a paved, graded driveway, offering parking terraces to each of the building's five levels. A connected roadway surrounding the Type A buildings in the southwestern portion of the site offers additional access to the dwellings. The rear elevations of Type A building pairs similarly face one another, while sharing green space in-between. The units on grade have rear concrete patios, some featuring gardens. A community garden sits just south of parcel 22.

Campus Landscape (contributing site)

The campus is highly site-sensitive, meticulously studied and planned with generously planted open spaces interspersed between buildings in order to blend and harmonize the property with the natural scenic quality of the surrounding Marin landscape. An extensive system of sinuous walkways meander throughout the campus, creating practical connections between buildings, as well as leading to common spaces, courtyards, and parking areas. The open quality of the campus, the variety and size of open spaces, as well as lush plantings creates a very pleasant and decidedly non-institutional character. One is afforded privacy as well as views to the landscape or even to the Bay beyond in the case of the upslope high-rise buildings. This helps to foster a more relaxed atmosphere where individuals have the opportunity and space to move freely in an attractively landscaped environment, as opposed to, and a reaction against, typical high-density public housing projects with rigidly controlled concrete landscapes.

Subject Area Description

The property site is set on a downward south-to-north slope. It is roughly bounded by the Golden Gate National Recreation Area (GGNRA) to the south, Highway 101 to the east, and mixed commercial/residential development to the north and west. The property includes 29 rectangular-plan buildings that can generally be referred to by their height: "low-rise" office or multi-unit apartment buildings that that are one story in height, and "high-rise" multi-unit apartment

buildings that are between two and five stories in height.

Within the irregularly shaped parcel, the administration and maintenance building (429 Drake Avenue) and eight high-rise buildings fan out from the low-rise cluster to the south. Each high-rise has a unique street address assigned to the whole building, with individual numbers for each dwelling unit within the building. Addresses for the eight high-rise buildings all end in 9: 409 and 419 Drake Avenue; 49, 59, 69, 79, 89, and 99 Cole Drive. These buildings are known by their respective street addresses. For example, Building 69 refers to 69 Cole Drive.

Terraced parking lots are located between the high-rise buildings. The parking lots terminate at an access drive behind the high-rises that functions as the southern perimeter of the site and is lined with a retaining wall that is 5 feet high. A steep vegetated slope south of the retaining wall is part of GGV but blends into the open space that is managed by GGNRA. Dense vegetation along the access drive south of the retaining wall and between the high-rise buildings (marking the rounded southern perimeter of the property) is the primary focus of this memorandum.

A cluster of low-rise buildings is located on Drake Avenue and encircled by Cole Drive. Several rectangular low-rise buildings are also located to the north of this central cluster between Drake Avenue and Highway 101. These buildings are organized in relationship to parking lots, courtyards, or recreational facilities, and are accessed via concrete walkways. The locations for the low-rise buildings have been graded to provide a relatively flat surface for each building, while the high-rise buildings are built into the steep topography at the south of the property.

The low-rise buildings each contain a composition of 4, 6, 8, or 10 units. Each unit has its own unique street address by which it is known. For example, 343 Cole is known as "343." Each low-rise unit is situated within a building known by the range of street addresses within it. Thus, "343" is located within 341–347, which is the low-rise building containing units 341, 343, 345, and 347 Drake Avenue.

In this memorandum, locations within the property are referred to by their proximity to a building or apartment number (e.g., "behind 343" refers to apartment 343 in the low-rise building that includes apartment units 341–347). The numbers refer to individual addresses along Drake Avenue or Cole Drive. A small site plan is included on the following page to illustrate the layout of the complex (Image 1); please reference Attachment 1 for a higher-resolution version of this site plan with legible building and apartment numbers.

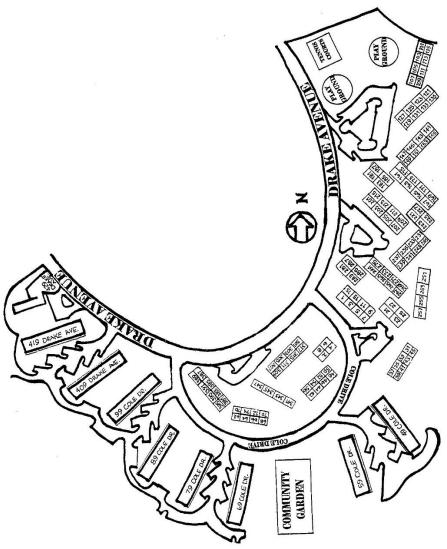


Image 1: A site plan illustration of Golden Gate Village. North is up, Highway 101 is to the east; not to scale. Courtesy: Marin Housing Authority.

Character-Defining Features

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 is 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 July 2019 draft 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 n.d.).

Vegetation is one of the 13 landscape characteristics and the focus of this Finding of Effect Memorandum. Vegetation, as a landscape characteristic, refers to the historical patterns of human-influenced plantings. Halprin designed the planting plan for GGV to include vegetation of the following character: grass cover in shared open spaces; evenly spaced rows of trees along the roadways and pedestrian pathways around the site; individual and small group specimen plantings adjacent to and between the residential units, parking areas, and shared open spaces to create areas of shade, separation, and visual interest; and densely planted areas along the edges of the site to the south and east as a means of blending into the densely wooded GGNRA land south of the site and also to screen the property from Highway 101 to the east. The original plant list for the GGV landscape incorporates the following types of vegetation (Attachment 2):²

- 6 species of vines
- 19 species of trees (including two varieties of eucalyptus or "gum" trees)
- 15 species of shrubs (including two varieties of broom)
- 6 species of groundcover
- 2 types of grass cover (one is simply listed as "grass area" and the other is specified as Rye grass)

Although Halprin's 1958 planting plan was detailed and his design intention was well explained, an examination of historic photos shows that the design was not fully implemented during the 1959–1960 construction period. A separate planting plan set was designed in 1974 by Richard Julin & Associates that was more completely implemented, according to historic aerial imagery (Attachment 4). Portions of the 1974 planting plan appear to emulate Halprin's 1958 plan, yet overall, the 1974 plan set should not be treated as the final expression of Halprin's original design intentions.³ Furthermore, vegetation alterations to improve drainage or slope stabilization occurred in various locations throughout GGV after 1974. For example, new plantings and vegetative patterns took effect in a 1979 project for erosion control and slope stabilization purposes; drainage issues called for the reworking of irrigation in 1983, which resulted in the modification of existing shrubs and lawn; and sod replacement projects have altered the composition of lawn species.⁴ Other alterations to original vegetation or Halprin's intentions occurred due to the site's northern boundary re-alignment and reconfiguration of the recreation

² See Attachment 2 for the complete list of plant species.

³ See Attachment 4 for the 1974 plan set and plant list.

⁴ 1979, 1983, and 1992 plan sets for GGV are archived at MHA's offices in San Rafael, among others.

area in 1992. Lastly, a general deterioration of the original layering of trees, shrubs, and groundcovers has occurred throughout the site over time due to a lack of maintenance.

In the Draft GGV Character-defining Feature Study, ICF analyzed Halprin's original planting plans and project notes to understand his design intention for the planting plan. ICF subsequently analyzed the construction projects that were undertaken after the construction period to understand the existing conditions of the site today and to develop a character-defining features list for vegetation. In general, character-defining features of a designed landscape would include original plant species prescribed by the designer in their original locations, in-kind replacements of plants in their original locations, and plants and patterns that follow the designer's original design intentions. Character-defining features may also include the spatial arrangement of vegetation within the site, such as planting beds or lawns, and "screens" or other visual borders formed by trees, shrubs, or vines.

The comprehensive character-defining feature list for vegetation at GGV from the Draft GGV Character-defining Feature Study includes the following:

- **A.** Lawn groundcover (rough character in high-rise cluster and more manicured character in low-rise and recreation area clusters)
- **B.** Row of London plane trees (*Platanus acerifolia*) along south side of Drake Avenue within bounds of semicircle area (between intersections of Cole Drive)
- C. Densely planted buffer including groupings of trees, shrubs and a groundcover along the eastern boundary of property, along Highway 101
- **D.** Dense row of coniferous trees along the northern edge of recreation area (where remaining)
- **E.** Hedges surrounding the low-rise buildings (where remaining)
- **F.** Chinese Elm (*Ulmus parvifolia*) and species of Plum trees alternating along the length of the driveways in the high-rise cluster
- **G.** Dense tree and shrub cover along the southern and southwestern edges of the site, where the property shares a boundary with GGNRA, and extending southward between buildings 69 and 59, extending the feeling of a woodland setting from the Marin Headlands

Character-defining feature that requires evaluation on a case-by-case basis:

H. Mixture of deciduous and coniferous trees throughout site creating shade, transitions, visual interest (actual species and placement has been altered in certain cases)

The proposed scope of work that is the subject of this memorandum is focused largely on the southern and eastern perimeter of the property, within the slope that rises from the property to blend into the adjacent GGNRA park land (character-defining feature G) or to screen the complex from the visual and auditory impacts of Highway 101 (character-defining feature C). Areas in between some of the buildings (both high-rise and low-rise) at the base of the slope are

also identified in the scope of work. These areas are generally overgrown with dense vegetation that has grown up to the edges of the private patio areas of the residents who live in the apartments that face the perimeter of the property (character-defining feature E). The vegetation is largely a combination of shrubs, trees, and groundcover.

IV. PROPOSED SCOPE OF WORK

Background

The Marin County Fire Department (MCFD) visited GGV on June 2, 2018, to complete an annual defensible space inspection of the site. Due to violations regarding fire safety and potentially dangerous vegetation, MCFD inspected the site and provided recommendations on three more occasions during August 2018. MCFD noted defensible space violations during the June 2, 2018 inspection and added three more violations during its second visit on August 7, 2018. The combination of defensible space violations is outlined below from Fire Inspection Report #1 (Report 1) and Fire Inspection Report #2 (Report 2) (Attachment 3:1; 3:2).

Defensible Space Violations at GGV included in Report 1 and Report 2

- Zone 1 (within 30 feet of all structures or to the property line)
 - C. Remove all dead or dying trees, branches, shrubs or other plants adjacent to or overhanging buildings.
 - D. Remove all dead or dying grass, plants, shrubs, trees, branches, leaves, weeds and needles.
 - o E. Remove or separate live flammable groundcover and shrubs.
- Zone 2 (within 30–100 feet of all structures or to the property line)
 - o H. Cut annual grasses and forbs to a maximum of 4 inches in height.
 - o I. Reduce fuels in accordance with the Fuel Separation or Continuous Tree Canopy guidelines.
 - K. Dead and dying woody surface fuels and aerial fuels shall be removed. Loose surface litter, normally consisting of fallen leaves or needles, twigs, bark cones, and small branches, shall be permitted to a maximum depth of three inches (3 in.).
- Defensible and Reduced Fuel Zone (within 100 feet of all structures or to property line)
 - L. Logs or stumps embedded in the soil must be removed or isolated from other vegetation.

Comments

• Please weed wack and clear brush 30-100' or to fence at 30 Cole Drive, clear brush and weed wack behind 69 Cole Drive 30-100' or to property line, clear scotch broom 30-100' behind 419 Drake, remove tree line encroaching power lines and roof at 239 Drake. Weed wack 251-257 Drake, 31-39 Cole. We will be back in 1-2 months. Thank you.

In Fire Inspection Reports #3 and #4, which documented visits 3 and 4, MCFD observed that improvements had been made to the site's defensible space around the buildings and through general maintenance practices, but made a broad recommendation to work with residents to remove plant debris and clutter (such as dropped eucalyptus leaves) from the private deck areas maintained by residents. MCFD also provided recommendations specific to several areas of the

site where the removal of live vegetation could improve overall fire safety and address the previously noted violations.

This memorandum focuses on the recommendations provided in Fire Inspection Report #4 from August 30, 2018 (Attachment 3.3), because it is the most comprehensive inspection. It incorporates recommendations made in prior reports while dropping recommendations that had already been addressed by GGV. The recommendations are intended to help GGV rectify the fire safety violations on the site, noted above.

Proposed Scope of Work

The proposed scope of work for the undertaking consists of the following nine site-specific treatment recommendations made by MCFD, in addition to the previously stated general recommendation to remove debris and clutter.

Treatment Recommendations in Fire Inspection Report #4 (Report 4), August 30, 2018⁵

- 1. Remove broom between buildings 419–429.
- 2. Completely remove/mow all vegetation above [south of] the retaining wall behind [a range of high-rise] buildings 69–419 to a depth of 25 feet.⁶
- 3. Remove small diameter eucalyptus beyond [south of] building 69 and cover cut eucalyptus stumps with landscape fabric to prevent re-sprouting.
- 4. Remove [cluster of] large eucalyptus trees to eliminate material falling on roof and decks [south and east of] building 69 and cover stumps.
- 5. Remove broom [east of building 69].
- 6. Remove brush and broom 20 feet from block wall behind [east of] building 49.
- 7. Cut broom and brush between building 49 and apartment 39 [in the low-rise building that includes units 37–45] to the "old cut-line."
- 8. Coordinate with residents to clean up yard behind [east of] apartments 251–257.
- 9. Remove brush and licorice plants behind [east of] apartments 251–257.

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

ICF has completed its review of the project documents (described previously) for the proposed undertaking to determine conformance of the undertaking with the Secretary of the Interior's Standards for Rehabilitation. Additionally, ICF conducted a site visit on January 10, 2019, to view the areas that are subject to the recommendations in the fire inspection reports. As described above, the proposed scope of work involves removing and/or cutting back vegetation that poses a fire risk on the site. This memorandum analyzes the vegetation management recommendations listed above made by MCFD within the context of the NRHP-listed historic landscape, as designed by master landscape architect Lawrence Halprin.

⁵ These recommendations are included verbatim from the inspection report. [Parenthetical] description was added by ICF for clarity. Please reference the site plan in Attachment 1 and the photos in Attachment 3.2-3.4 for further illustration including photos and annotated aerial views.

⁶ This recommendation encompasses the area behind a row of six high-rise buildings, including 69, 79, 89, 99 Cole Drive, and 409, 419 Drave Avenue.

In determining if the proposed defensible space vegetation-removal undertaking has the potential to effect the historic landscape, ICF reviewed the Halprin-era and subsequent planting plans of the landscape areas addressed under the nine recommendations. The general recommendation to remove debris and overall clutter would not pose a potential effect to the historic landscape, as well as the removal of brush in recommendations 6 and 7. Likewise, recommendation 8 and 9 do not include actions that have the potential to effect vegetation that was part of the original planting plan or only include typical plant maintenance practices (such as pruning or weeding) that would not alter the original design intention.

Recommendations 1, 5, 6, and 7 prescribe the removal of broom growing near and between buildings. Although two species of broom (*Genista racemosa* and *Spartium junceum*) were included in Halprin's original 1958 planting plan, only portions of this plan were carried out, and it is unknown whether the broom intended between buildings was implemented. Today, the broom has spread well beyond the original design intention of small groupings of six or less plants that provide texture and color in the landscape. Therefore, the removal of broom in recommendations 1, 5, 6, and 7 would not pose a potential effect to the historic landscape. In keeping with the original design intent of the NRHP-listed historic landscape, GGV could replace the broom with a Marin County-approved fire-wise species that is compatible with the original planting plan to provide texture and color in the landscape. Examples include Cape honeysuckle (*Tecomaria capensis*), escallonia (*Escallonia spp.*), and Bush anemone (*Carpenteria californica*) (Fire Safe Marin 2019).

However, recommendations 2, 3, 4, and 7 include actions that have the potential to effect original plant material or the intention behind the original landscape design; therefore, these recommendations are discussed below.

Analysis by Recommendation/Scope of Work Item

Recommendation 2: Completely remove/mow all vegetation above the retaining wall behind buildings 69–419 to a depth of 25 feet⁷

The steep slope that rises to the south from the 5-foot retaining wall behind the row of six high-rise buildings 69–419 (along the southern perimeter of the site bordering the wooded preserve) is overgrown with dense shrubs, including broom, blackberry brambles, and clusters of different types of trees such as eucalyptus. The design intent of buildings 69–419 was that they were built into the southern woodland setting. The original planting plans called for a blending of the slope south of the retaining wall with the natural vegetation of the Marin Headlands. Halprin called for groupings of white gum (*Eucalyptus viminalyis*), two species of broom (*Genista racemosa* and *Spartium junceum*), lilac melaleuca (*Malaleuca decussata*), and ceanothus (*Ceanothus crisus horizontalis*) with a groundcover of rough rye grass. Although it is unknown if each of these original Halprin species were planted along the southern slope within 25 feet of the service road, historic images and aerials show the slope was planted in 1961. By 1968, the plantings appeared to blend in with the natural vegetation of the Marin Headlands to the south (Ruark 2017; Nationwide Environmental Title Research,

⁷ This recommendation encompasses the area behind a row of six high-rise buildings, including 69, 79, 89, 99 Cole Drive, and 409, 419 Drave Ave.

LLC 1968). Removal of all the vegetation has the potential to adversely effect character-defining feature G, from the list above. Therefore, complete removal of all vegetation from this area of the property would <u>not</u> meet the Secretary's Standards for Rehabilitation.

Condition: GGV shall work with MCFD to determine an acceptable height to which it could cut back and/or mow the vegetation from the retaining wall without completely removing it. Given the overall design of the historic landscape and the presence of specific plantings in this area historically, it would be appropriate for GGV to cut back and/or mow this vegetation without removing it completely. Vegetation that is compatible with Halprin's design intention could include a mixture of low-growing species in this area, rather than sowing a homogenous 25-foot strip of mowed lawn. GGV should engage a qualified landscape architect and historic preservation consultant to identify a fire-wise and compatible plant palette with the historic landscape for a long-term solution for this area of the property.

Recommendation 3: Remove small-diameter eucalyptus beyond [south of] building 69 and cover cut eucalyptus stumps with landscape fabric to prevent re-sprouting

• Halprin's 1958 planting plan prescribed eucalyptus trees in clusters of six or less, and the 1974 planting plan called for two species of eucalyptus trees (*Eucalyptus viminalis* and *Eucalyptus polyanthemos*). Similar to the description for recommendation 2, the cluster of trees located between buildings 69 and 59 were intended to extend the woodland setting for GGV. The large grouping of canopy trees filled in this area by 1968, creating an extension from the woodlands to the south (Nationwide Environmental Title Research, LLC 1968). Today, the eucalyptus trees south of building 69 have spread beyond the original design intention. Removal of small-diameter eucalyptus trees south of building 69 may meet the Secretary's Standards for Rehabilitation, but clarification is needed as to what "small" refers to so as not to adversely effect character-defining feature G, from the list above.

Condition: GGV shall work with MCFD to clarify the dimensions of "small diameter" eucalyptus trees. *Eucalyptus viminalis* can range from small to very large trees. The original design intention should be maintained of providing a woodland setting extending from the Marin Headlands to the south with clusters of approximately 6 or less trees.

Recommendation 4: Remove [cluster of] large eucalyptus trees to eliminate material falling on roof and decks [south and east of] building 69 and cover stumps

• As stated in recommendation 3, the cluster of trees located between buildings 69 and 59 was intended to extend the woodland setting for GGV and can be seen in the 1968 historic aerial as an extension from the woodlands to the south (Nationwide Environmental Title Research, LLC 1968). Today, eucalyptus trees have overgrown in number and are encroaching upon building 69, yet complete removal of the entire cluster of trees has the potential to adversely effect character-defining feature G and would not meet the Secretary's Standards for Rehabilitation.

Condition: GGV shall work with MCFD to determine the removal of eucalyptus trees south and east of building 69 of only those trees that pose a threat to the building. Given the design intent for this area to have a cluster of canopy trees,

management options could also include pruning the eucalyptus trees or removing the eucalyptus trees <u>and</u> replacing with a species that is a Marin County-approved fire-wise species and a compatible species with the historic landscape such as California ash (*Fraxinus depetala*) or flowering ash (*Fraxinus ornus*) (Fire Safe Marin 2019).

Recommendation 7: Cut broom and brush between building 49 and apartment 39 to the "old cut-line"

• This recommendation may require further clarification from MCPD as to where the "old cut-line" falls. It appears that vegetation has spread from the eastern slope along Highway 101 west, beyond the block wall referenced in recommendation 6 and nearing the sidewalk that wraps around apartments 39–45. As stated above, the removal of broom would not pose a potential effect to the historic landscape. Hedges surrounding the low-rise buildings, including apartments 39–45 were included in the original 1958 and 1974 planting plans. Cutting vegetation that includes hedges surrounding a low-rise building has the potential to adversely effect character-defining feature E and would <u>not</u> meet the Secretary's Standards for Rehabilitation.

Condition: If GGV cuts back the broom and brush between building 49 and apartment 39 between the block wall at the base of Highway 101 and outside the looped sidewalk surrounding apartments 39–45 so as not to disturb hedges, this action would both meet the intention behind the MCFD's recommendation and meet the Secretary of the Interior's Standards for Rehabilitation.

In summary, the proposed scope of work generally respects the historic character of the existing cultural landscape. It does not recommend any changes to the spatial organization of the buildings or structures, courtyards, and parking areas; the steeply sloping topography; or the circulation of roads and walking paths that contribute to the character of the historic landscape. As discussed previously, maintenance including the removal of debris and clutter would not be inherently harmful to the landscape.

The scope of work as currently proposed, however, includes the removal of vegetation that would alter Halprin's original design for an extension of the woodland setting to the south, a variety of textures and colors in the site's vegetation, and hedges designed to surround the low-rise buildings to provide screening and privacy for residents. For the recommendations that pose a potential effect to the historic landscape, 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. For example, the removal of mature eucalyptus trees with the replacement of a Marin County-approved fire-wise species and species compatible with the historic landscape would be consistent with the Secretary's Standards for Rehabilitation.

Conclusion

If implemented according to the conditions described above, ICF has determined that the undertaking conforms with the Standards for Rehabilitation; therefore, the undertaking would constitute a *conditional* no adverse effect on the historic property.

Golden Gate Village, 101–429 Drake Avenue & 1–99 Cole Drive, Marin City September 25, 2019

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 in the APE. Nor would the proposed undertaking diminish the historic property's eligibility for the NRHP as a historic district under the area of landscape architecture.

V. ATTACHMENTS

- 1. Marin Housing Authority Site Plan (n.d.)
- 2. Original Landscape Plans for the site, including the Plant List (1958)
- 3. Fire Inspection Reports:
 - 3.1. Fire Inspection Report #1 (June 2, 2018)
 - 3.2. Fire Inspection Report #2 (August 7, 2018)
 - 3.3. Fire Inspection Report #3 (August 13, 2018)
 - 3.4. Fire Inspection Report #4 (August 30, 2018)
- 4. Landscape plans for the site, including Plant List (1974)

VI. REFERENCES

Fire Safe Marin

2019 "Fire-Resistant Plants." Available: https://www.firesafemarin.org/plants/fire-resistant. Accessed: August 14, 2019.

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1968. 101 Drake Avenue, Sausalito, California, aerial photograph and topographic maps. HistoricAerials.com. Available: http://www.historicaerials.com/viewer. Accessed: August 8, 2019.

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n.d. Landscape Lines 3: Landscape Characteristics. Available: https://irma.nps.gov/DataStore/DownloadFile/514956. Accessed: August 20, 2019.

Page, Robert R., Killion, Jeffrey, and Hilyard, Gretchen

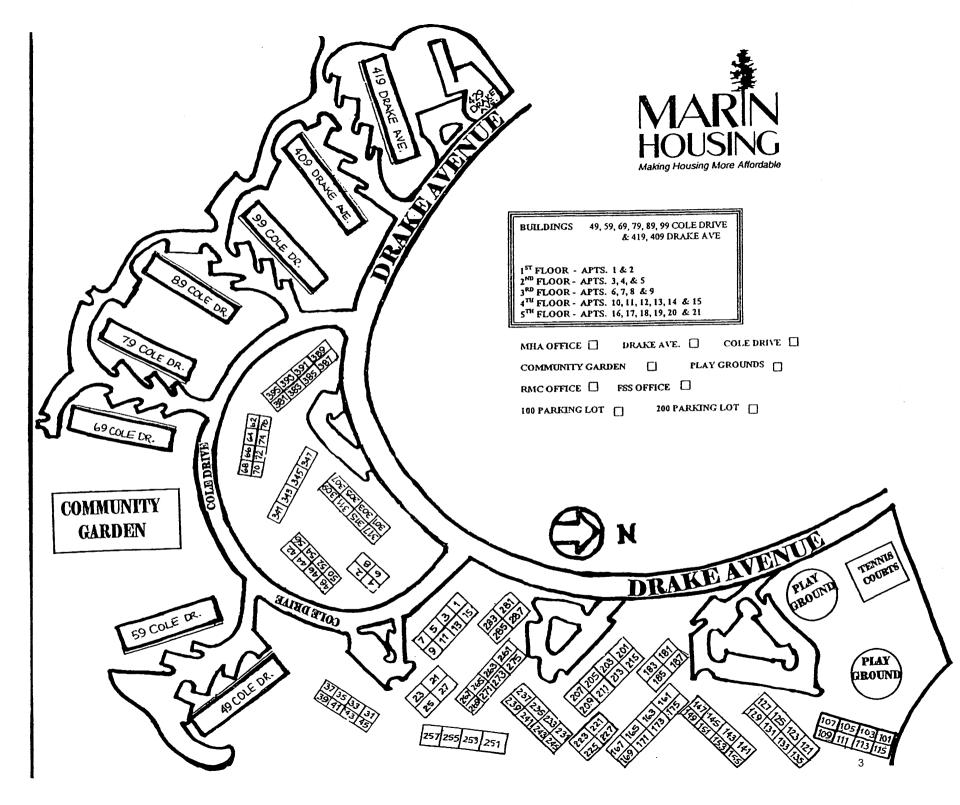
2009 National Park Service Cultural Landscapes Inventory Professional Procedures Guide. U.S. Department of the Interior, National Park Service, Cultural Resource Stewardship Partnerships, Park Historic Structures and Cultural Landscapes Program. Washington, District of Columbia. Available: https://www.nps.gov/oclp/CLI%20PPG_January2009_ small.pdf. Accessed: August 3, 2019.

Ruark, Daniel

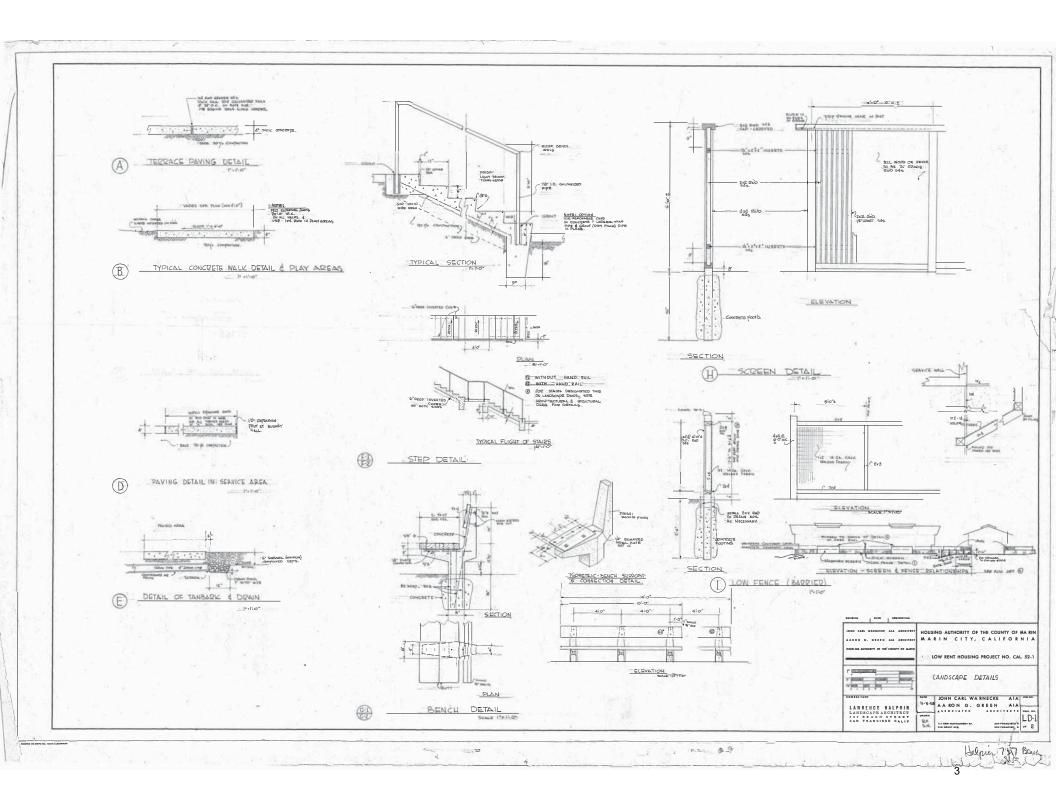
2017 National Register Nomination Form [Draft] for Marin City Public Housing.

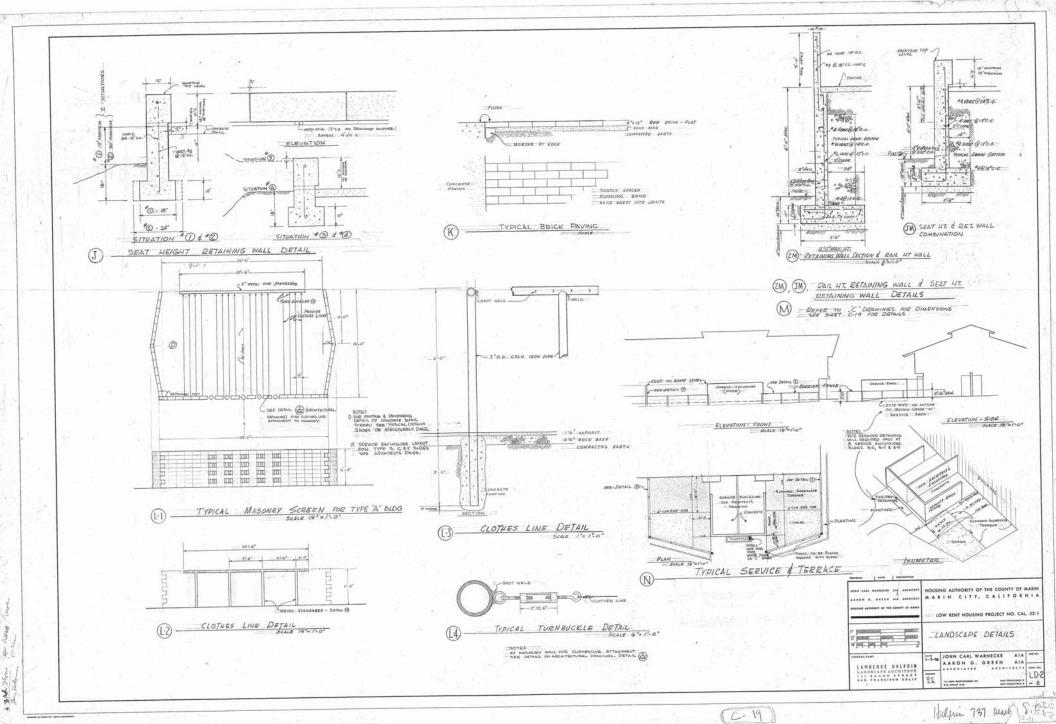
Attachment 1 - Marin Housing Authority Site Plan (n.d.)

GOLDEN N G A T E A GE

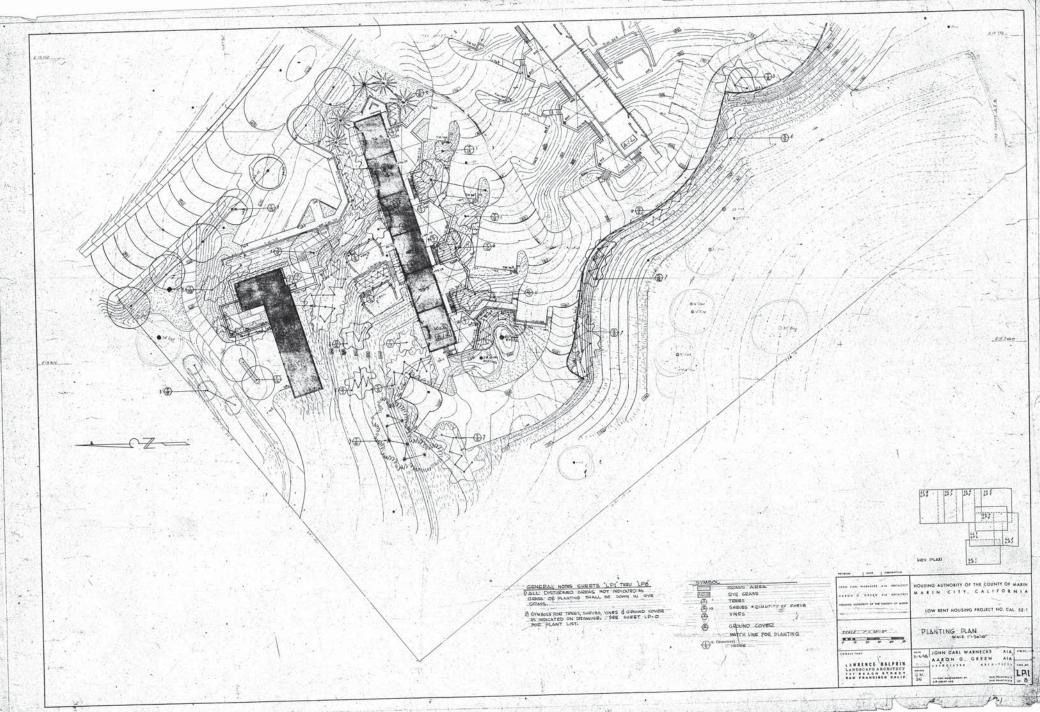


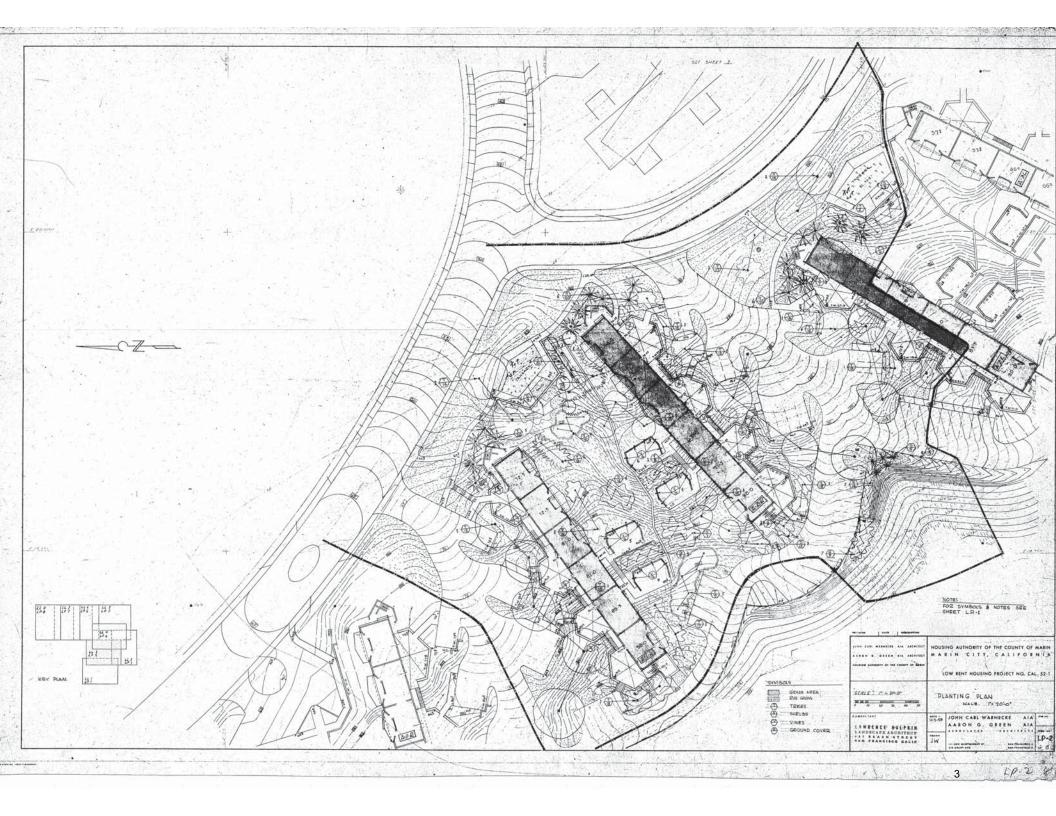
Attachment 2 - Original Landscape Plans for the site, including the Plant List (1958)

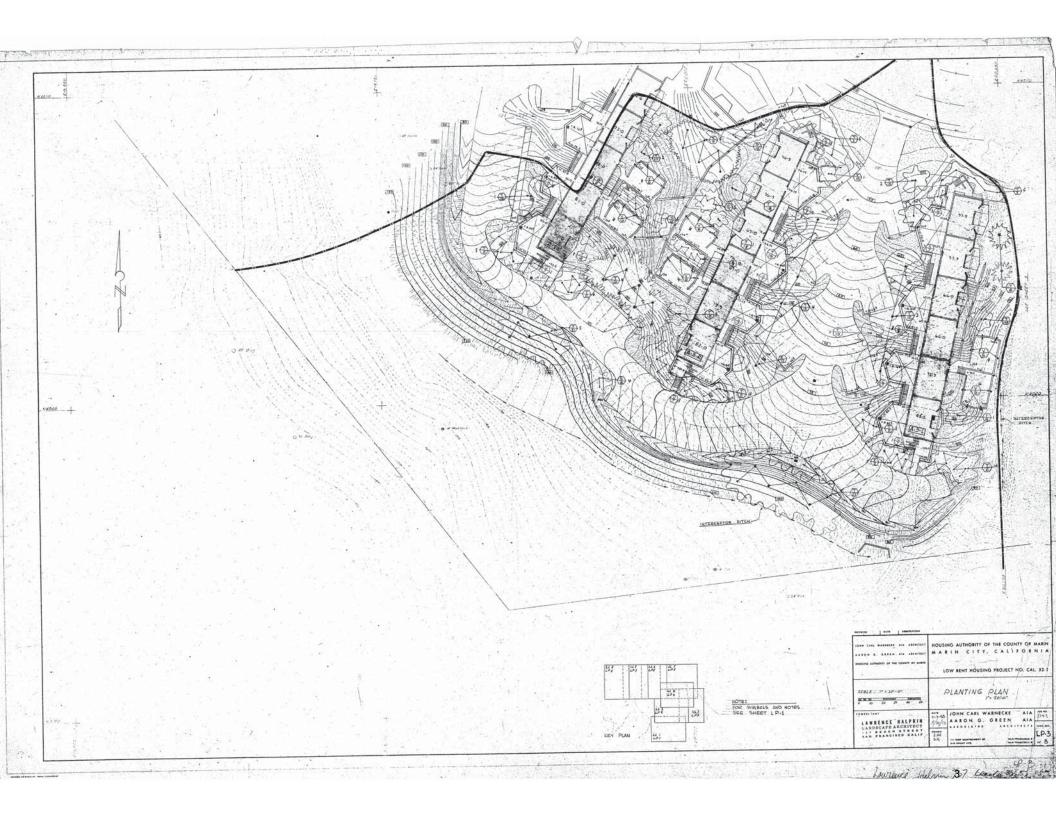




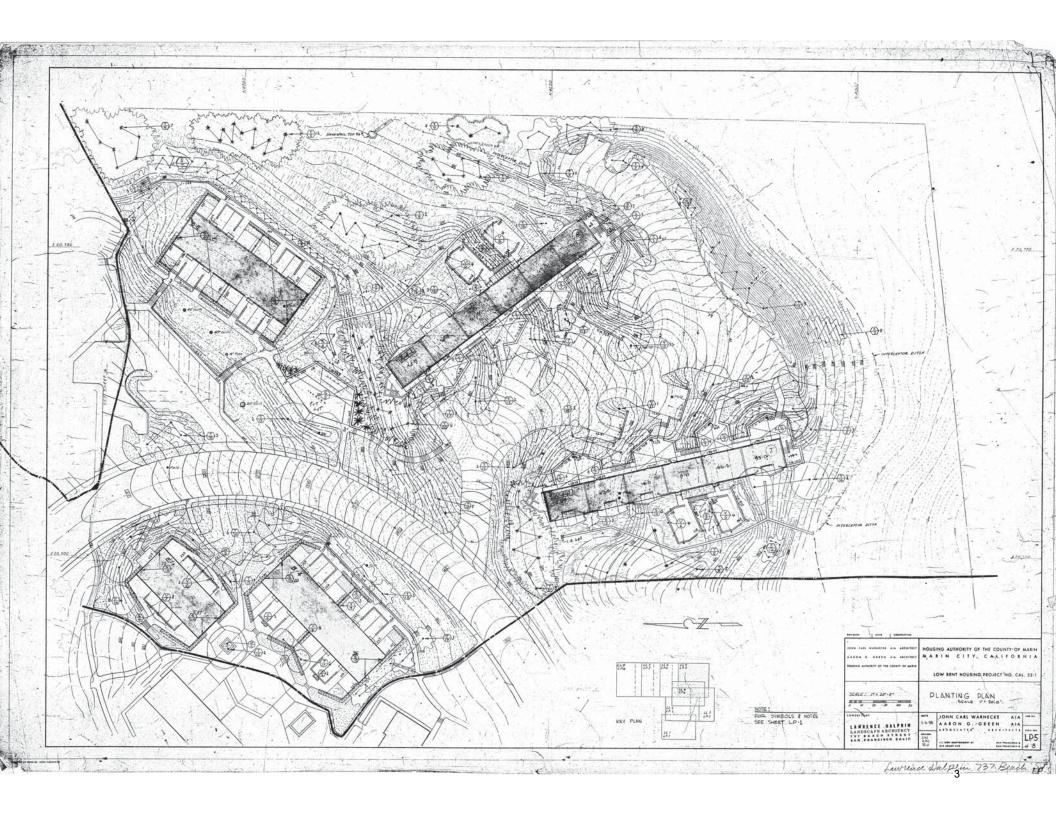
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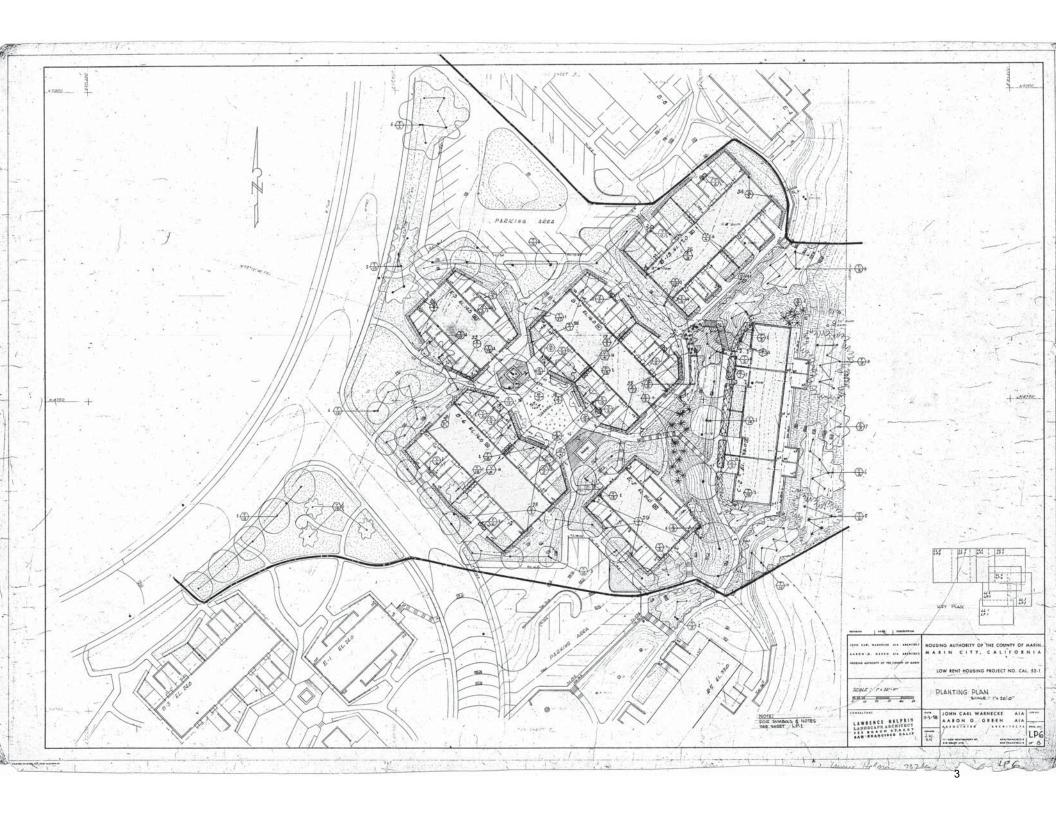






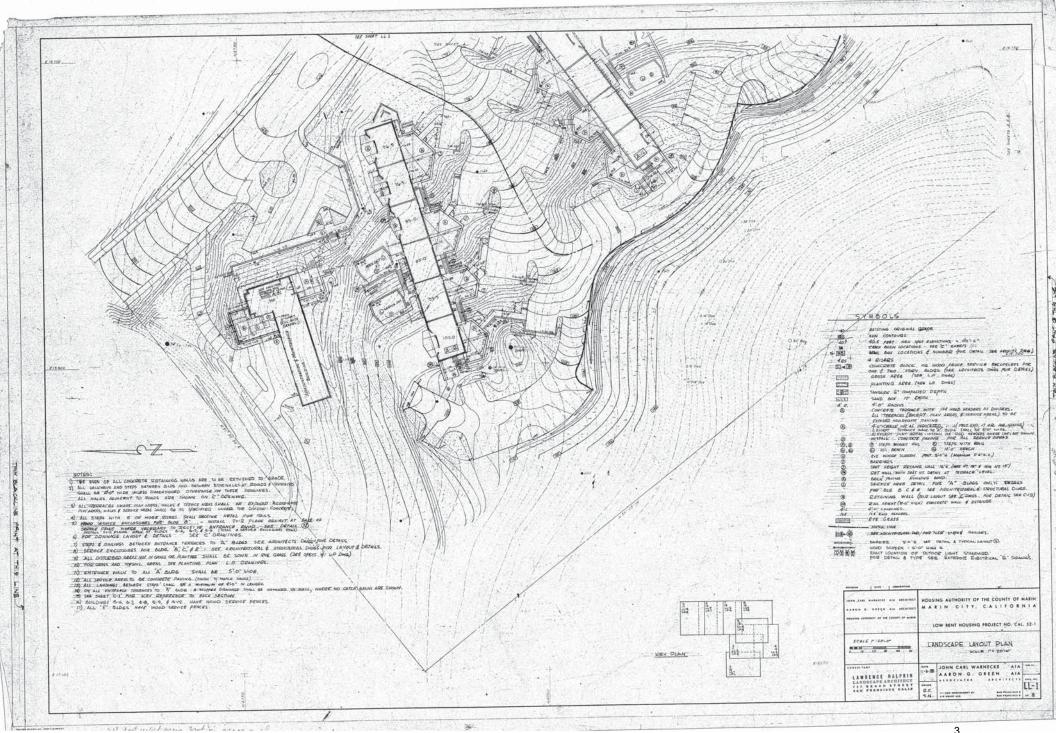


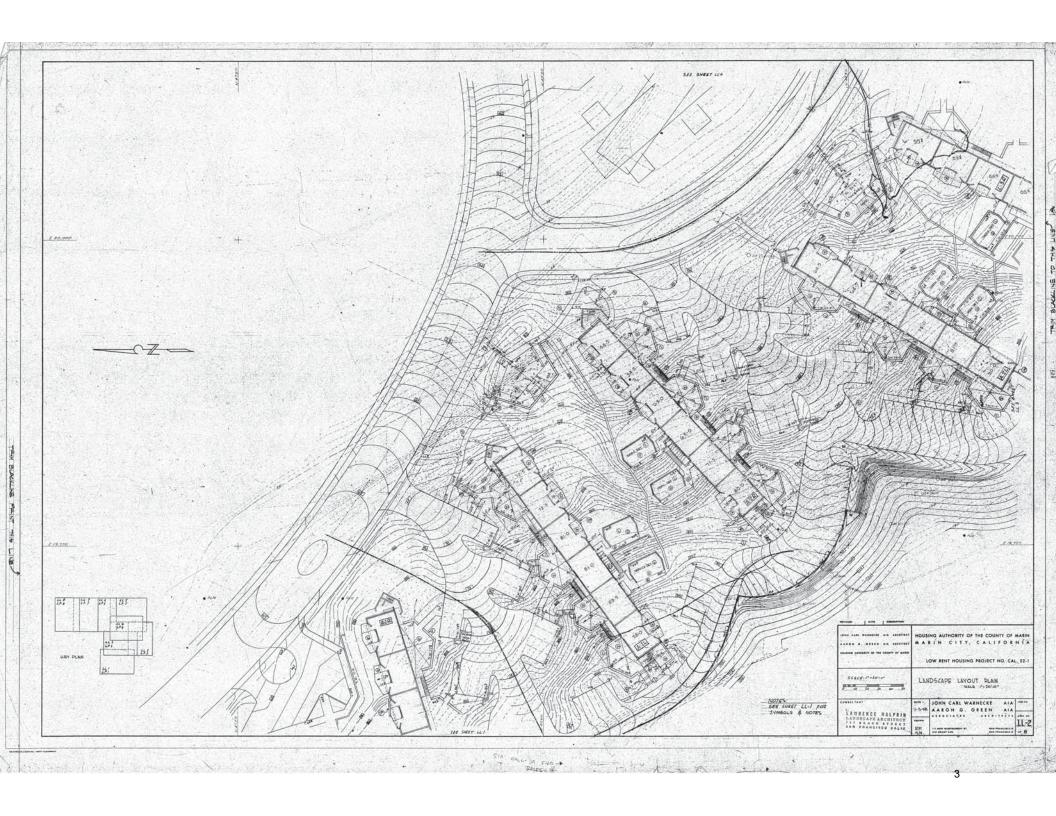


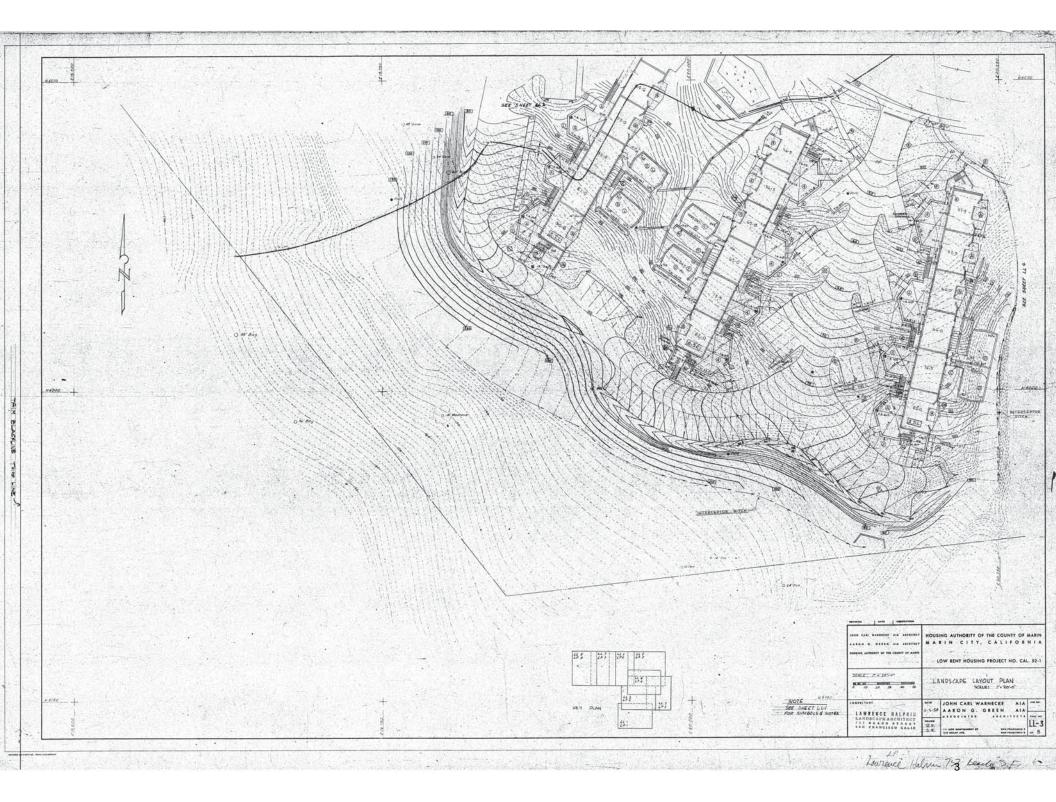


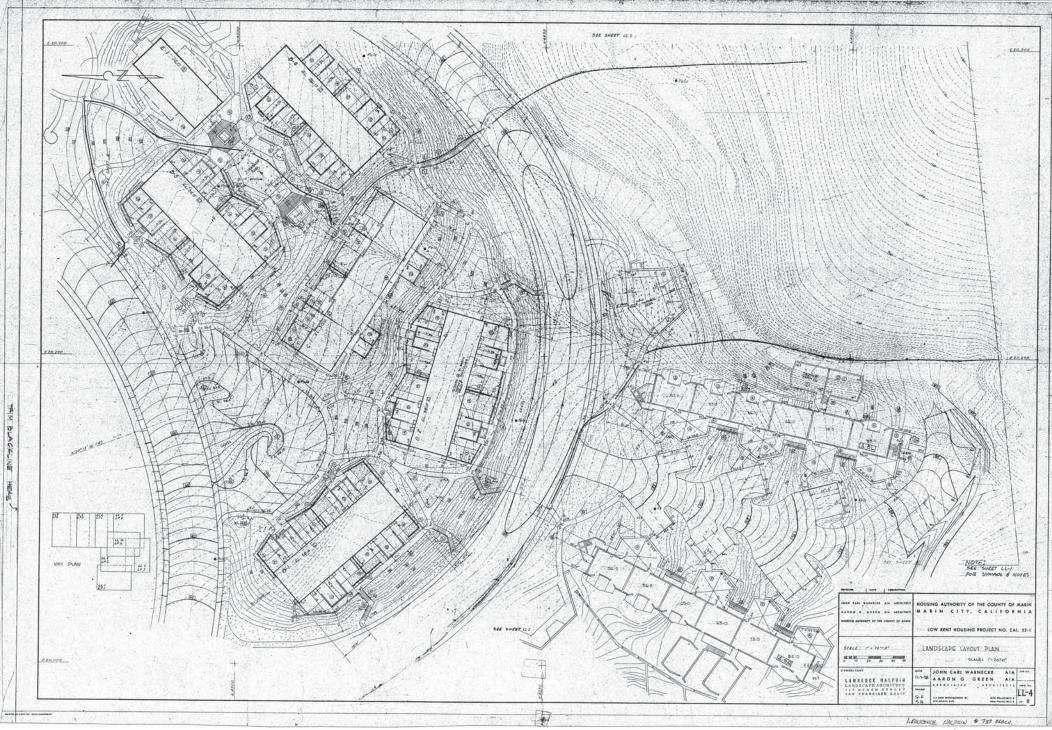


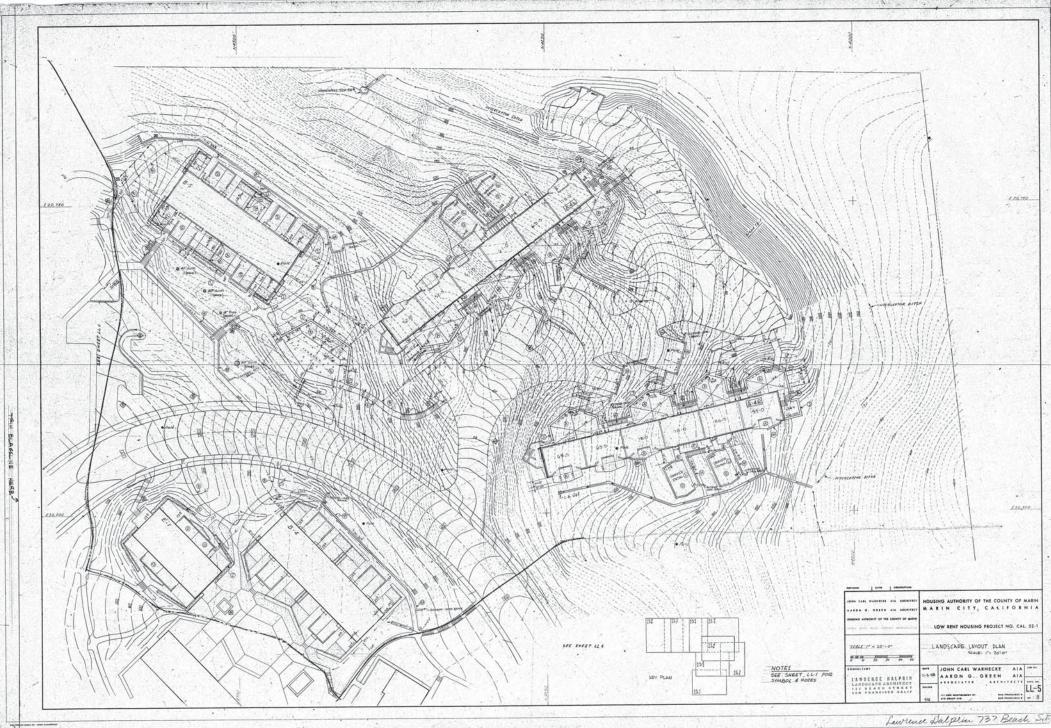


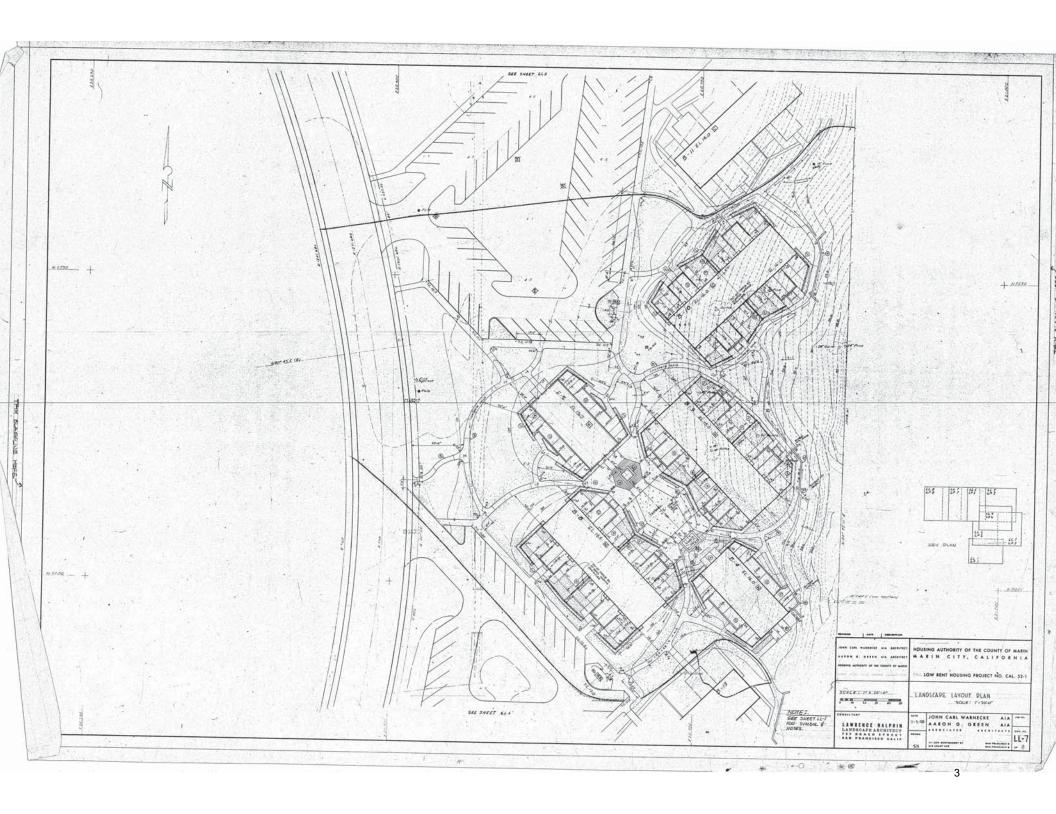


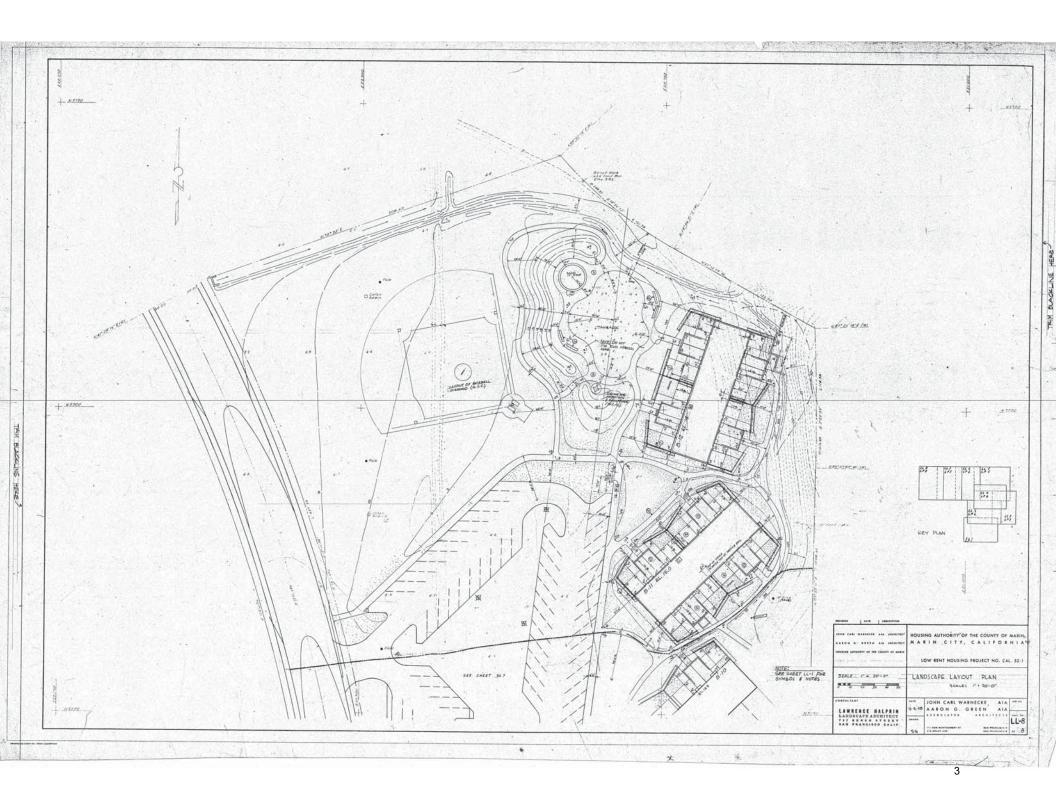












Attachment 3 - Fire Inspection Reports:

Fire Inspection #1 (2 June 2018)

Fire Inspection #2 (7 August 2018)

Fire Inspection #3 (13 August 2018)

Fire Inspection #4 (30 August 2018)

Attachment 3.1 - Fire Inspection #1 (2 June 2018)



NOTICE OF DEFENSIBLE SPACE INSPECTION

A fire department representative has inspected your property for fire hazards. You are hereby notified to correct the violation(s) indicated below. Failure to correct these violations may result in a citation and fine.

Owr	ner/Tenant:		re	Inspection	Address:		ADD RESSES	+2a	DORAKE MA			
Pho	ne:	Mail	ing Address: (if diff	erent from Inspect		, , , , , ,	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	101	OT OT			
Insp	ector Name:	JOHN	AITCHI	90N	For Questions	: 415-473-2207 or	email <u>defensiblespace@n</u>	narincount	y.org			
	Construction Ex	7	Window Panes	Eaves	Vents	Decks/Porches	Location of Structure	₩ 1 st	Attempt			
_	Combustible ire Resistant	Combustible Single Pane Fire Resistant Multi Pane		Enclosed	Screened	Masonry Composite	Flat Ground Slope	2 nd Attempt				
-					4 32	Wood	Ridge Top	Ref	used inspection			
	Corrected		Zone 1	(within 30 fe	eet of all str	uctures or to	property line):					
Checked boxes indicate violations	2 3 A. Remove all branches within 10 feet of any chimney or stovepipe outlet, pursuant to PRC § 4291(a)(4)							PRC § 4291(a)(4) and 14 CC	R§ 1299.0	03(a)(2).		
	2 3	B. Remove leaves, needles or other vegetation on roof, gutters, decks, porches, stairways, etc. pursuant to PRC § 4291(a)(6) and 14 CCR § 1299.03(a)(1).										
	2 3	C. Remove all dead or dying trees, branches, shrubs or other plants adjacent to or overhanging buildings, pursuant to PRC § 4291(a)(5) and 14 CCR § 1299.03(a)(2).										
	2 3	D. Remove all dead or dying grass, plants, shrubs, trees, branches, leaves, weeds and needles, pursuant to 14 CCR § 1299.03(a)(1).										
	2 3	E. Remove o	or separate live flar	nmable ground cov	er and shrubs, p	ursuant to PRC § 42	91(a)(1) and BOF General (Guidelines i	tem 1.			
	2 3	F. Remove fla 14 CCR § 129		n and items that co	uld catch fire wh	ich are adjacent to	or below combustible deck	s, balconies	, and stairs, pursuant to			
	2 3	G. Relocate e	xposed wood piles	outside of zone 1 u	inless completely	covered in a fire re	esistive material, pursuant t	o 14 CCR §	1299.03(a)(3).			
cate		Zone 2 (Within 30-100 feet of all structures or to property line):										
ndi	2 3	H. Cut annual grasses and forbs to a maximum of 4 inches in height, pursuant to 14 CCR § 1299.03(b)(2)(B).										
es i	2 3	I. Reduce fuels in accordance with the Fuel Separation or Continuous Tree Canopy guidelines (see back), pursuant to BOF General Guidelines item 4.										
d bo	2 3	J. All exposed woodpiles must have a minimum of ten feet (10 feet) clearance, down to bare mineral soil, in all directions, pursuant to 14 CCR § 1299.03(b)(2)(C).										
necke	2 3	K. Dead and dying woody surface fuels and aerial fuels shall be removed. Loose surface litter, normally consisting of fallen leaves or needles, twigs, bark cones, and small branches, shall be permitted to a maximum depth of three inches (3 in.), pursuant to 14 CCR § 1299.03(b)(2)(A).										
J		Defensible and Reduced Fuel Zone (within 100 feet of all structures or to property line):										
	2 3	L. Logs or stumps embedded in the soil must be removed or isolated from other vegetation, pursuant to BOF General Guideline item 3.										
		Other Requirements:										
	2 3	M. Outbuildings and Liquid Propane Gas (LPG) storage tanks shall have ten feet (10 ft.) of clearance to bare mineral soil and no flammable vegetation for an additional ten feet (10 ft.) around their exterior, pursuant to 14 CCR § 1299.03(c)(1).							o flammable			
	2 3	N. Address numbers shall be displayed in contrasting colors (4" Min. Size) and readable from the street or access road, pursuant to 2013 CFC §505.1.										
	2 3	O. Equip chimney or stovepipe openings with a metal screen having openings between 3/8 inch and ½ inch, pursuant to 2013 CBC §2113.9.2.										
	No violation	ns observed	at date of ins	spection	54				The same of the			
Cor	mments: PLE	ASE WE	to walk	AND CLE	AC BRUS	H 30-100	D' OR TO FEI	NCE E	2 30 COLE			
P	SEVE, CL	TAR BRUY	4 AXA W	FENTUALLA	BEHEAL	69 000	E DETUE 3	-lool	er to D			
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₂ In	spector		A 7 T		Date:	43000 400	A re-inspection will occur or	n/after:				
	spector				Date:	I	For questions, contact Inspe	ector at:				
-,						-						

Fuel Separation Standard

Pursuant to Board of Forestry (BOF) general Guidelines item 4a, in Zone 2, cut annual grasses and forbs not to exceed four inches in height. Horizontal clearance between shrubs should be 4 to 40 feet depending on the slope of the land and vegetation type/size. Horizontal clearance between tree canopies should be 10 to 30 feet depending on slope and vegetation type/size. Vertical clearance between surface fuels and lower tree limbs should be 4 to 40 feet depending on slope and vegetation type. Check the chart below for an estimation of clearance distance. Any questions regarding requirements for a specific property should be addressed to your local fire official.

Minimum Horizontal Spacing Guidelines							
Slope	Shrubs, Ground Covers & Other Ornamental Plants Space required between clumps of ground cover, plants, bushes, shrubs, seedlings or sapling trees, etc.	Trees Space required between tree canopies or groups of trees					
Flat or gentle slope (0% to 20%)	2 times the height of the plant	10 feet					
Moderate slope (20% to 40%)	4 times the height of the plant	20 feet					
Steep slope (greater than 40%)	6 times the height of the plant	30 feet					

Continuous Tree Canopy Standard

Pursuant to Board of Forestry (BOF) general Guidelines item 4b, in Zone 2, to achieve defensible space while keeping a stand of larger trees with a continuous tree canopy, adhere to the guidelines below:

Prune lower branches of trees to a height of 6 to 15 feet from the top of the vegetation below (or the lower 1/3 branches for smaller trees). Steeper slopes, and more severe fire danger will dictate pruning heights on the upper end of the scale.

Remove all surface fuels greater than four inches in height. Single trees or other vegetation may be kept if they are well spaced, well pruned, and will not spread fire to other vegetation or structures.

Public Resource Code PRC § 4291 and Chapter 16.17 Marin County Code. (a) A person who owns, leases, controls, operates, or maintains a building or structure in, upon, or adjoining a mountainous area, forest-covered lands, brush-covered lands, grass-covered lands, or land that is covered with flammable material, shall at all times do all of the following:

(1) Maintain defensible space of 100 feet from each side and from the front and rear of the structure, but not beyond the property line except as provided in paragraph (2). The amount of fuel modification necessary shall take into account the flammability of the structure as affected by building material, building standards, location, and type of vegetation. Fuels shall be maintained in a condition so that a wildfire burning under average weather conditions would be unlikely to ignite the structure. This paragraph does not apply to single specimens of trees or other vegetation that are well-pruned and maintained so as to effectively manage fuels and not form a means of rapidly transmitting fire from other nearby vegetation to a structure or from a structure to other nearby vegetation. The intensity of fuels management may vary within the 100-foot perimeter of the structure, the most intense being within the first 30 feet around the structure. Consistent with fuels management objectives, steps should be taken to minimize erosion. For the purposes of this paragraph, "fuel" means any combustible material, including petroleum-based products and wildland fuels.

(2)A greater distance than that required under paragraph (1) may be required by state law, local ordinance, rule, or regulation. Clearance beyond the property line may only be required if the state law, local ordinance, rule, or regulation includes findings that the clearing is necessary to significantly reduce the risk of transmission of flame or heat sufficient to ignite the structure, and there is no other feasible mitigation measure possible to reduce the risk of ignition or spread of wildfire to the structure. Clearance on adjacent property shall only be conducted following written consent by the adjacent landowner.

(3)An insurance company that insures an occupied dwelling or occupied structure may require a greater distance than that required under paragraph (1) if a fire expert, designated by the director, provides findings that the clearing is necessary to significantly reduce the risk of transmission of flame or heat sufficient to ignite the structure, and there is no other feasible mitigation measure possible to reduce the risk of ignition or spread of wildfire to the structure. The greater distance may not be beyond the properly line unless allowed by state law, local ordinance, rule, or regulation.

(4)Remove that portion of a tree that extends within 10 feet of the outlet of a chimney or stovepipe.

(5)Maintain a tree, shrub, or other plant adjacent to or overhanging a building free of dead or dying wood.

(6) Maintain the roof of a structure free of leaves, needles, or other vegetative materials.

PRC\$4119. The department, or its duly authorized agent, shall enforce the state forest and fire laws. The department may inspect all properties, except the interior of dwellings, subject to the state forest and fire laws, for the purpose of ascertaining compliance with such laws.

For additional information on how to comply with defensible space clearance requirements, please visit: WWW.FIRE.CA.GOV or WWW.MARINCOUNTYFIRE.ORG/DEFENSIBLESPACE

Attachment 3.2 - Fire Inspection #2 (7 August 2018)

From: "Cameron Andersen" < cam.sfmoto@gmail.com>

To: "Weber, Jason" < JWeber@marincounty.org>

Subject: Fwd: Marin City inspections

Chief Weber,

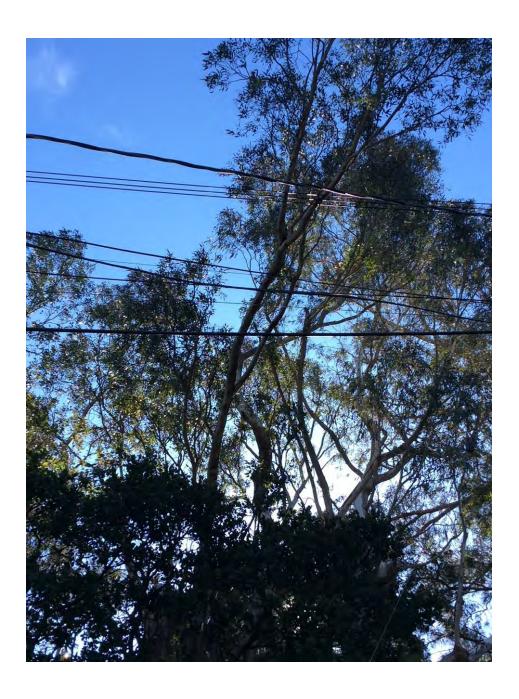
Attached to this email are photos of the re-inspection that we conducted in Marin City on Thursday August 2nd. As you can see from the photos much of the weed eating has been completed but the removal of the brush has yet to begin. In the first photo the eucalyptus tree is in contact with the power lines. This was not mentioned in the first inspection form. The second photo is of the branch and the power drop to the structure noted in the comments section on the form. I do not know is PG&E has been contacted about these issues but I would be happy to do so if you need. Additionally I observed 3 violations that were absent on the initial inspection form; violation boxes C,E and L. If there is any way that I can assist further please let me know.

Cameron T. Andersen

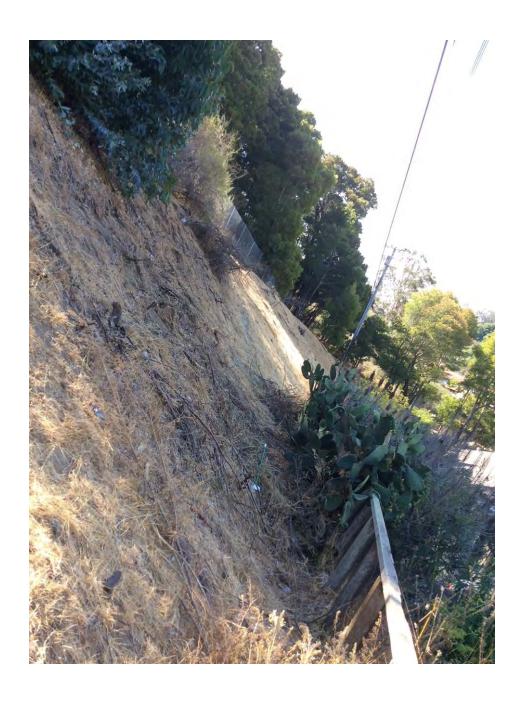
From: Marin County Fire Department < marin.dspace@gmail.com >

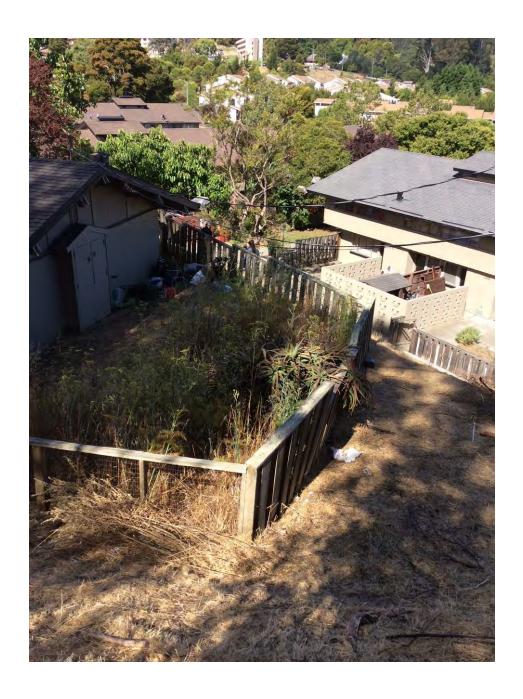
Date: Tue, Aug 7, 2018 at 4:48 PM Subject: Marin City inspections
To: cam.SFmoto@gmail.com

Sent from my iPad

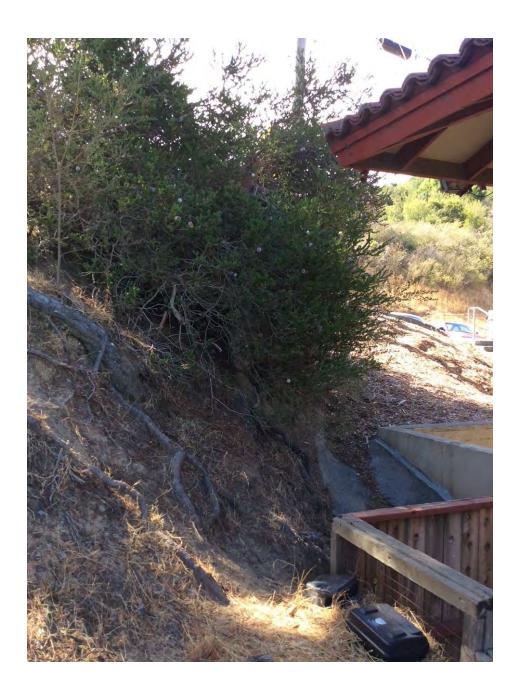














Attachment 3.3 - Fire Inspection #3 (13 August 2018)



- 1. Remove broom between 419 Drake and office at 429.
- 2. Knock down and spread out chip piles behind 419
- 3. Remove dead and down material immediately above retaining wall consider erosion control and minimize ground disturbing
- 4. Remove brush, broom 10' from block wall behind 49 Cole
- 5. Cut broom and brush between 49 Cole and Appt. 39 to "old cut line"



- 6. Work with residents to clean up behind 251-257 Cole dr. remove licorice plant and yard debris
- 7. Ensure adequate fuel reduction behind building off 100 and 200 lot adjacent to Freeway. Combination of residents cleaning up yard and yard debris cutting back brush/broom at least 10' from fence lines.

Once larger cutting of brush and broom is complete maintain annually by cutting grasses once dry typically in June. Maintain properties by removing dead and down material as it accumulates or falls.

Overall, very pleased with the amount of defensible space created around the buildings and regular maintenance that is occuring.

Attachment 3.4 - Fire Inspection #4 (30 August 2018)

Marin County Fire Department

Vegetation Management Recommendations for Marin Commons Golden Gate Village (GGV)

PURPOSE

The Marin County Fire Department (MCFD) conducted annual defensible space inspections for the Golden Gate Village (GGV). Guidance was given to meet the required defensible space for individual structures on the property. At the request of the GGV, the MCFD is providing recommendations for additional vegetation removal to enhance fire protection for the community.

OBSERVATIONS

Overall the GGV property is in very good condition with the amount of defensible space created around the buildings and regular maintenance that is occuring.

There are a few areas that if improved upon would increase the overall fire safety for the community.

There is heavy and continuous fuel along the GGV boundary with NPS lands. The NPS is going to be improving access while creating fuel reduction zones along critical adjacent fire roads. Any additional work done by GGV would collaboratively enhance the overall effectives of the combined treatments.

The large parking area along the back of the property provides a good starting point to build off. There is good fire apparatus access and additional vegetation removal along this area would greatly increase firefighting opportunities during an incident. Much of the vegetation in this area is dense native shrub, French Broom, Bay Laurel and Eucalyptus.

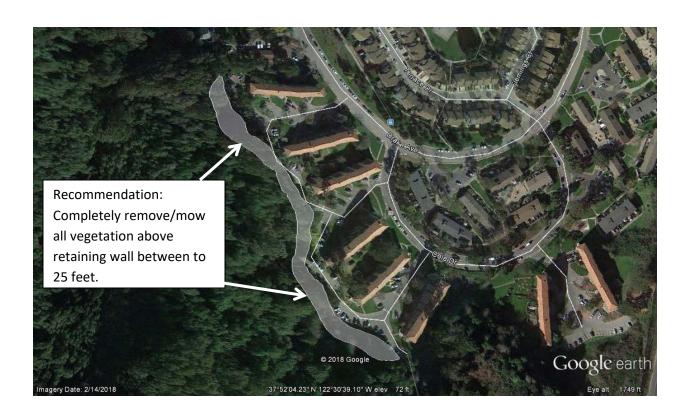
There is a need for additional clean-up of yard debris and vegetation removal behind multiple residents. Many of the porches of 69 Cole Dr. have eucalyptus debris and overall clutter. The potential is very high for an ember ignition on these porches.

After the intial removal of brush , broom and trees is complete it will be critical to annually maintain the sites.

TREATMENT RECOMMENDATIONS

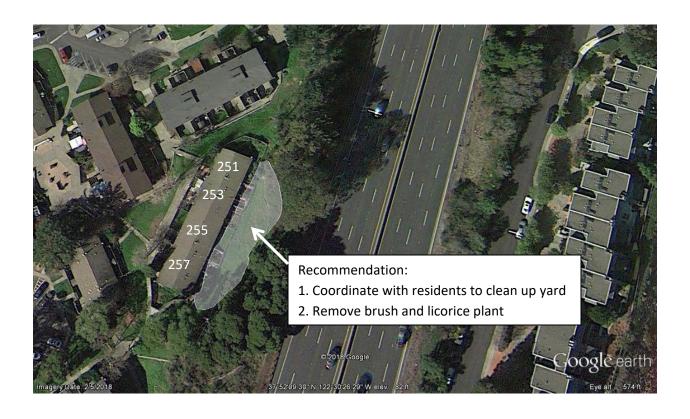
The following maps contain general recommendations for vegetation removal for specific areas on the property. Along with these recommendations the importance of regularly maintaining these areas and continuing defensible space work is critical to help better protect the GGV from wildfire. Please contact the MCFD if any clarifications or discussions on these recommendations are required .











Attachment 4 - Updated Landscape Plans for the site, including the Plant List (1974)

