February 10, 2021

Re:  Golden Gate Village, French Drain Installation Section 106 Closing Letter

Dear Interested Parties:

The intent of this letter is to state that the Section 106 process regarding the French Drain Installation undertaking at Golden Gate Village has been concluded. We have included a summary of the consultation process and comments below.

Summary of Consultation Process

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

The proposed undertaking included the installation of a new drain element at the south end of 49 Cole Drive, and the analysis outlined in the FOE memorandum resulted in a finding No Adverse Effect under Section 106. A letter dated August 12, 2020 from the State Historic Preservation Office (SHPO) concurred with the No Adverse Effect finding stated in the FOE Memorandum.

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

Because the Section 106 process was reopened, the comment period was extended through October 30, 2020.

Consulting Parties

The following organizations were invited to consult under Section 106 on proposed repair and maintenance undertakings at Golden Gate Village: Aaron G. Green Associates, Inc.; California Historical Society; Docomomo, Northern California Chapter; Golden Gate Village Residents Council; Historic American Landscape Survey (HALS), Northern California Chapter; Marin City Community Services District; Marin County Free Library; the Marin History Museum; Sierra Club, Northern California Chapter; Federated Indians of Graton Rancheria, California; Guidiville Indian Rancheria; and Ione Band of Miwok Indians of California. This invitation to consult on repair and maintenance undertakings is limited to projects that are considered minor in
nature and are not likely to result in adverse effects. Section 106 review for any major projects at Golden Gate Village will be initiated under separate cover.

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

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

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<th>Consulting Party</th>
<th>Tribal Party</th>
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<tr>
<td>Golden Gate Village Resident Council</td>
<td>The Federated Indians of Graton Rancheria (California)</td>
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<td>Marin City Community Services District</td>
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<td>Sierra Club, Northern California Chapter</td>
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<td>Daniel Ruark, Architect</td>
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During the October 2020 extended comment period, comments were received from participating Consulting Parties. The County also received comments from one member of the public: Ora Hathaway. The following table consolidates and summarizes comments received regarding the French Drain Installation undertaking that pertain to the potential for effects to the historic property. Comments that are outside the scope of Section 106 review are not summarized in this letter.

Table 2: Comments Summary

| Organization: Golden Gate Village Resident Council (Royce McLemore) | Summary of Comments Received: MHA has deferred maintenance and neglected the existing drainage system and vegetation management which has caused flooding and damage. Cutting into the building will cause an adverse effect; debris should be cleared instead. Concerns with not enough documentation of the greater stormwater system in FOE. | Date received/Comment format: October 5, 2020/email; October 29, 2020/email | Response: MHA has determined that the installation of the French drain is the most appropriate solution to immediately address the flooding concern at 49 Cole Drive. Therefore, the French drain project is the proposed undertaking that is evaluated in the FOE. The full drainage system was evaluated in a 2019 Character-Defining Feature Study and elements were determined to |
| Daniel Ruark (architect) | October 30, 2020 / email | “Constructed Water Features” header should be changed to “Existing Storm Drain System”  
- The proposed undertaking does not address wider concerns regarding deferred maintenance of the storm drainage system beyond the immediate project area.  
- Concerns with ICF as the historic consultant preparing stormwater drainage analysis  
- Proposes alternative solutions to drainage maintenance  
- Believes the French Drain will not alleviate flooding at unit #15  
- French Drain would cause an adverse effect by cutting into the building  
- Does not want this FOE approved | “Constructed Water Features” is a landscape characteristic defined by the National Park Service in best practices guidance relating to the identification and documentation of cultural landscapes. The Constructed Water Features section in the 2019 Character-Defining Features Study also includes irrigation features.  
The purpose of this Section 106 undertaking is to assess the potential for effects associated with the installation of a French drain to address flooding in unit #15. General concerns or suggestions about drainage maintenance throughout the property should be directed to MHA’s facilities staff.  
The FOE memorandum was prepared by ICF Historians who meet the Secretary of the Interior’s Professional Qualification Standards for History and Architectural History. The purpose of the FOE was to assess the potential for effects to the historic property as the result of the installation of the French drain. Expertise in stormwater drainage is not necessary to determine adverse effects under Section 106 of the NHPA. Project alternatives would only be explored if adverse effects contribute to the historic property, but the full drainage system is not currently the subject of an active undertaking. |
effects were identified and resolution was required.

Page 7 of the FOE describes how existing openings in the concrete walls of the building will be utilized where possible rather than inserting new cuts. Furthermore, the analysis presented under Secretary of the Interior’s Standards 2 and 5 on pages 12-13 describes cutting into the building would be a minor alteration to one character-defining feature of the larger historic property, which is defined as Golden Gate Village Historic District.

| Ora Hathaway (member of the public) | • There are project alternatives that don't harm the building  
• Concerns with the project causing adverse effects  
• MHA should repair their existing stormwater infrastructure  
• The FOE should reference the Marin City Drainage Study | October 30, 2020 / emails |
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<td></td>
<td>MHA has determined that the installation of the French drain is the most appropriate solution to immediately address the flooding concern, and it is therefore the subject of this undertaking.</td>
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<td>The analysis provided on pages 12-13 in the FOE memorandum determines that this undertaking is a minor alteration to the historic property as a whole and would not result in adverse effects to the historic district.</td>
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<td>The purpose of the FOE was to assess the potential for effects to the historic property as the result of the installation of the French drain and expertise in stormwater drainage is not necessary to determine adverse effects under Section 106 of the NHPA.</td>
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After considering the full scope of the enclosed comments, including those summarized above, the County has determined that the FOE sufficiently documents and analyzes the potential for adverse effects. This letter presents a final finding of *No Adverse Effect* in order to formally conclude Section 106 consultation with regards to this undertaking.

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

Sincerely,

Evan Smith
Modernization Mgr.