

## FINDING OF EFFECT MEMORANDUM

**To:** Tammy Taylor, CDA; Robin Fies, CDA  
**From:** Adrian Chorley, MHA  
**Date:** March 10, 2024  
**Re:** **Golden Gate Village Playground Upgrades / SWCA Project No. 82807**

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

### PROJECT OVERVIEW

**Historic Property:** Golden Gate Village  
**Project Name:** Playground Replacements  
**Street Address:** Administration Office, 429 Drake Avenue, Marin City  
**Project Applicant:** Marin Housing Authority; County of Marin  
**Lead Agency:** County of Marin, on behalf of the Department of Housing and Urban Development  
**Contact:** Adrian Chorley, Marin Housing Authority

SWCA is conducting a review of the undertaking at the above-referenced address under Section 106 of the National Historic Preservation Act (Section 106). MHA proposes to replace play equipment in three locations on the property with modern play equipment within the existing footprint of the play areas. No work would be done to the existing sidewalks or landscaping (see Attachment A for additional details).

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

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

### Project Documents Reviewed:

- 2017 National Register of Historic Places Registration Form, prepared by Daniel Ruark.
- 2019 Character-Defining Feature Study, prepared by ICF.

## **AREA OF POTENTIAL EFFECT**

For the subject undertaking, MHA proposes removal of two playground sets in the Recreational Area Cluster and one located between Buildings B-5 and 49 (Figures 1 and 4). Both the 2019 Character-Defining Feature Study and the 2017 Nomination form concur that the existing Recreational Cluster as a whole is not a Character-Defining Feature of the property and that all existing play equipment was installed after the period of significance and does not contribute to the historic character of the property. To fully evaluate direct and indirect effects of this undertaking, the Area of Potential Effect considers the full boundary of the historic district.

## **DESCRIPTION OF HISTORIC PROPERTY**

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

Marin City Public Housing is eligible for listing on the National Register of Historic Places at the local level of significance under Criterion A in the areas of Social History and Community Planning and Development as a product of post-WWII urban development in Northern California, and under Criterion C in the areas of Architecture and Landscape Architecture, for its association with three prominent mid-century designers: Architects John Carl Warnecke and Aaron G. Green, and Landscape Architect Lawrence Halprin. The period of significance is 1955 to 1960, representing a span of events beginning with County Supervisor Vera Schultz’ lead role in acquiring the land for redevelopment as a permanent community—particularly for low-income workers who lost their jobs at the close of the Marin shipyard—through Master Planning for the new community by County Planning Director Mary Summers and her department, the selection of Architects John Carl Warnecke and Aaron G. Green as associated architects for the design of the 300 unit low-rent housing project, the design and approval process for the project, and construction (Ruark 2017:Section 8, Page 15).

Per the 2017 NRHP Nomination form, the historic district includes 29 contributing buildings and one contributing site, a historic landscape designed by Halprin that includes vegetation, circulation, topographic, and constructed water features.

## **SCOPE OF WORK**

MHA proposes to replace three sets of playground equipment within their existing footprints at three locations on the property, noted below as Playgrounds 1, 2, and 3. The proposed locations will be at two existing playground sites in the Recreational Area Cluster (Figures 1, 2, 3) and between Building B-5 and Building 49 (Figures 4, 5). MHA proposes replacing the play equipment with similar, modern structures. Existing landscaping and sidewalks would remain in place and no excavation is required. The area was graded during the construction of GGV, and no known archaeological resources are located within the APE.



**Figure 1. Proposed location of playground replacements near 101 Drake Avenue and Parking Lot 1. Building B-12 at top-right. Source: Google Earth, 2024.**



**Figure 2. Existing equipment at Playground 1, looking south. Source: MHA, 2024.**



Figure 3. Existing equipment at Playground 2, looking northeast. Source: MHA, 2024.

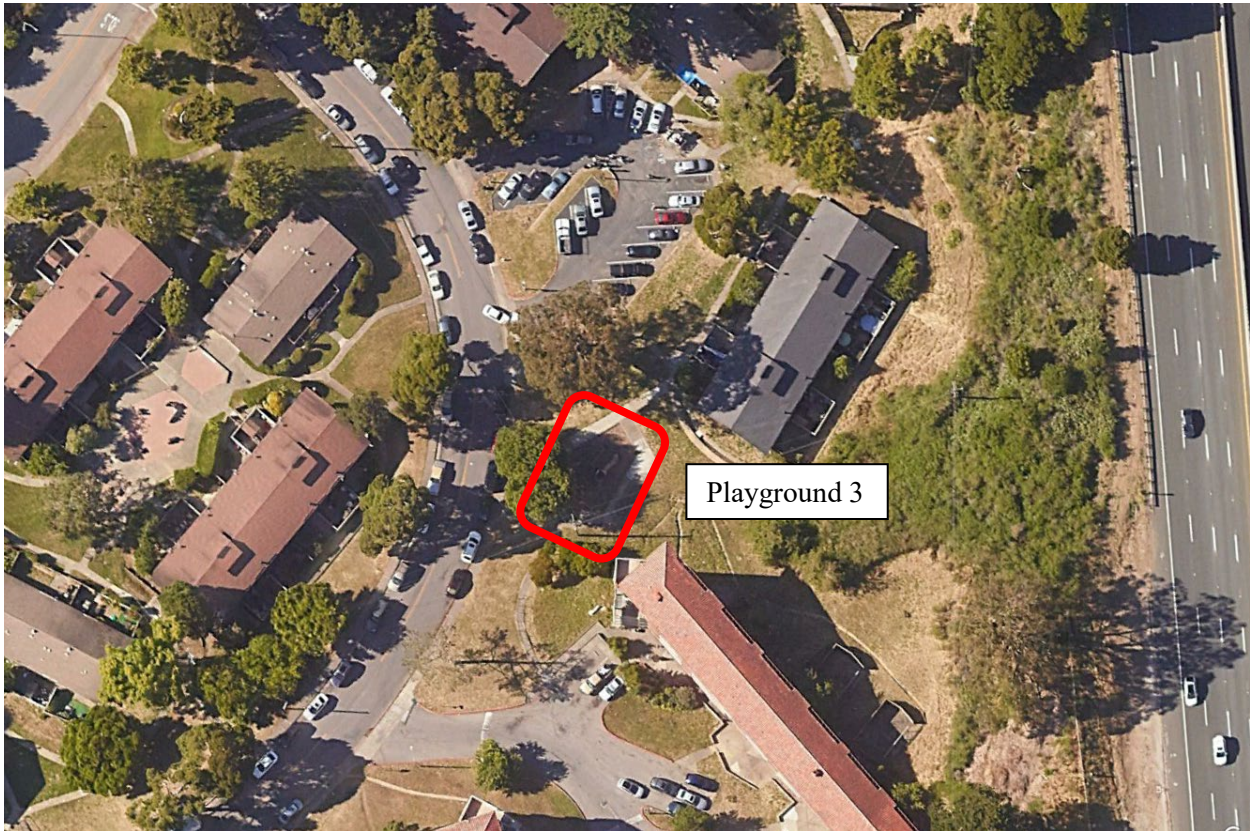


Figure 4. Proposed location of playground replacements near 49 Drake Avenue. Building B-5 at top-right. Source: Google Earth, 2024.



**Figure 5. Existing equipment at Playground 3, looking south.** Source: MHA, 2024.

## **PROJECT ANALYSIS**

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

### ***Playgrounds***

Based on the 2019 CDF Study, the Recreational Area Cluster at the northernmost boundary of GGV experienced two substantive redesigns over the life of the property. In 1974, the original large playground was completely redeveloped and a basketball and tennis court replaced the original baseball diamond. In 1992, coinciding with the realignment of Donahue Road, the tennis and basketball courts were relocated south of their original 1974 location and the play area reimaged to its current layout with new play structures, picnic tables, trash cans, barbeque pits, and circulation features. The CDF Study states that “while the historic land use and location of the Recreational Area Cluster remains intact, the Recreational Area Cluster lacks integrity of design and spatial organization due to the alterations done after the period of significance.” The CDF Study thus concluded that the Recreational Area Cluster’s existing layout is not a character-defining feature, nor is the play equipment or general design of the play areas (ICF 2019:4-4 – 4-6, 5-11 – 5-17, 5-49 – 5-50). The 2017 National Register nomination form notes that this play area had been altered, including the removal of original benches for the addition of grouped seating areas with tables and child play structures as well as previously open areas that were filled with modular paving.

The National Register nomination form does not identify the existing Recreational Area Cluster or its distinct features as character-defining features or contributing elements of the historic district (Ruark 2017).

## **APPLICATION OF THE CRITERIA OF ADVERSE EFFECT**

The framework for assessing adverse effects from an undertaking on a historic property is provided in Section 106 of the National Historic Preservation Act, 36 CFR 800.5 and the Criteria of Adverse Effect are identified in 36 C.F.R. 800.5(1). An adverse effect is found when a project may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a

historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the project that may occur later in time, be farther removed in distance, or be cumulative.

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

- (i) Physical destruction of or damage to all or part of the property;
- (ii) Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the Secretary's standards for the treatment of historic properties (36 CFR part 68) and applicable guidelines;
- (iii) Removal of the property from its historic location;
- (iv) Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;
- (v) Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features;
- (vi) Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and
- (vii) Transfer, lease, or sale of property out of federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

## **FINDING OF EFFECT DETERMINATION**

The Criteria of Adverse Effect and examples of adverse effects were applied to the historic property. The project would replace three existing contemporary playgrounds within areas of the property already altered or not identified as CDFs of GGv and occur at ground-level elevation such that it would not diminish the integrity of any CDFs of GGv. Materials like concrete, mulch, and sod that would be impacted by the project are not CDFs of GGv and would be replaced with similar materials. The project would not alter any CDFs of the property such as the location or spatial relationships of the landscaping or vegetation (example i). Non-CDF materials such as concrete, asphalt, and sod have a finite lifespan as demonstrated by the repair history of these elements at GGv. These materials would be replaced in kind, conforming with the Secretary of the Interior's Standards for the Treatment of Historic Properties (Secretary's Standards). Because the proposed undertaking calls for an in-kind replacement of a non-character-defining feature, a complete evaluation of the project's conformance with the Secretary's standards is not necessary (example ii). The historic property would not be moved from its location (example iii). The property would retain its use as a multi-family residential complex and the project would not change any character-defining physical features that contribute to its historic significance and the play areas would remain in use as recreational spaces with updated equipment (example iv). The undertaking would introduce modern play equipment to serve the residents of GGv. These new features will be at ground level and minimal in scope and have no potential to visually affect the historic property. Thus, the project would not diminish the integrity of the property's significant historic features (example v). The property would not be neglected as part of the project (example vi) nor would it be sold, transferred or leased out of federal ownership or control (example vii).

In conclusion, the proposed undertaking to install new playground equipment would not adversely affect the historic property.

## REFERENCES CITED

Google Earth

2022 Historical aerial photograph. Available: <https://www.google.com/earth/versions/>. Accessed: March 6, 2024.

Marin Housing Authority (MHA)

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

Ruark, Daniel

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

# ATTACHMENT A

## GOLDEN GATE VILLAGE / SECTION 106

### S106 Undertaking Assessment Request

FROM: MHA  
TO: SWCA, Ali Kirby  
DATE: February 29<sup>th</sup>, 2024  
PROJECT NAME : Playground replacement & upgrade

MHA is providing the below items and requests that SWCA review the proposed scope and make recommendations for Section 106 review requirements.

- Work site location diagram and/or photo(s): X
  
- Existing conditions photos: X
  
- Written scope incl. approximate schedule, plans/drawings, work site access details, anticipated equipment needs (i.e. heavy machinery) Attached documents show layout and scope of new playgrounds. Each new playground will conform to existing boundaries of current playgrounds.  
X
  
- Other information or documentation associated with the proposed work: N/A

Y / N Is County CDA already aware of MHA's proposed work and SWCA's pending recommendation regarding Section 106 review needs? Yes

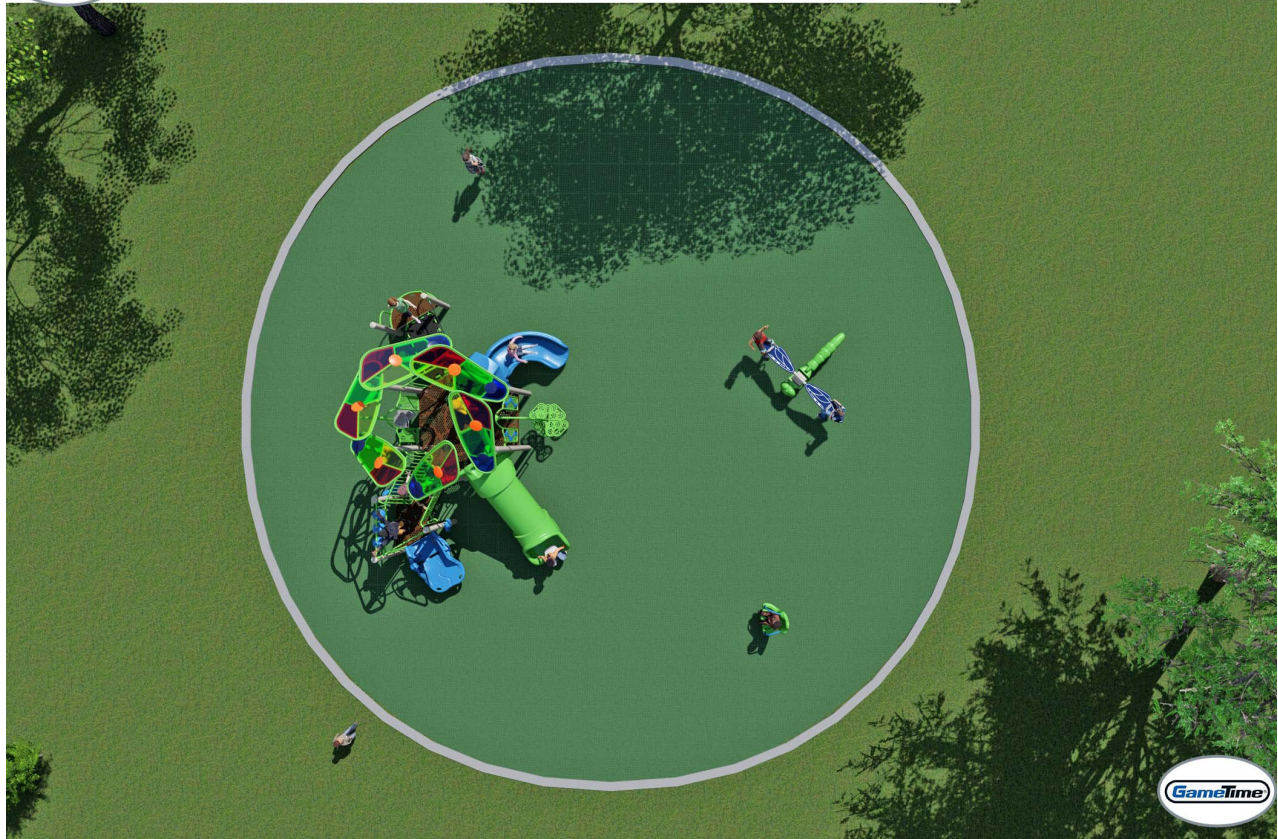
SCOPE OF WORK: complete removal and replacement of existing playgrounds at GGV. This will include a new safety ground cover base.



Proposed equipment:



## Golden Gate Village – Option A



Existing Conditions:



Playground 2 – recreation area



Playground 2 – recreation area



Playground 3 – Near Building 49



Damaged slide, playground 1