

# **FINDING OF EFFECT MEMORANDUM (Revised)**

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

**July 14, 2020**

## **I. PROJECT OVERVIEW**

**Historic Property:** Golden Gate Village  
**Project Name:** 115 Drake Avenue Repair  
**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  
**Project Contact:** Evan Smith, esmith@marinhousing.org

### **Project Documents Reviewed:**

- GGV landscape plans with plant list, Lawrence Halprin, 1958
- GGV Type B Building, Original Plans, John Carl Warnecke, AIA and Aaron G. Green, AIA, 1958
- Remodel of Building B-12, Clark and Yates Assoc. Architects, 1985
- Remodel of Building B-12—Schematic Plan, Clark and Yates Assoc. Architects & Omni Lang Associates, Inc. (OLA), Landscape Architects, 1985
- Draft National Register Nomination for Golden Gate Village, 2017
- Character-Defining Feature Study for Golden Gate Village, 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 repair damage at unit 115 Drake Ave that resulted from a fire in April 2020. 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 repair of 115 Drake Avenue at building B-12 would constitute *no adverse effect* on the historic property.

## **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. The APE for this

undertaking is defined as the entire Building B-12 footprint and immediately adjacent landscape features, including the wood fence and gate and private yard to the building's rear (Figure 1).



**Figure 1: An aerial site plan illustration of the APE for 115 Drake Ave. shown in red. North is up, Highway 101 is to the east. Courtesy: Google Earth, 2020.**

The majority of the damage to the property occurred on the interior of the second floor of the 115 Drake unit, which is located at the north end of low-rise building B-12. Since much of the proposed scope of work would occur on the interior of the unit, which does not include character-defining features, the project has low potential to adversely effect the historic property. Exterior work would be limited to repair of sections of the roof and cladding, the pedestrian door and exterior staircase at the north façade, and the windows. This exterior work will be located at the north end the building and minimally visible from within the historic property.

The alterations included in the proposed project are minimal in nature and limited to material repairs of the building. No spatial relationships or other landscape characteristics of the historic

district will be affected as a result of the proposed undertaking. Therefore, the APE has been limited to the building footprint where project activities are occurring.

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

GGV (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.

#### **National Register Description**

Per the NRHP nomination form, the historic district includes 29 contributing buildings and 1 site, a historic landscape designed by Halprin. The following information has been excerpted from the 2017 NRHP nomination for GGV to provide the context for the proposed undertaking:

##### ***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. 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.*

##### ***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. The largest building type, the rectangular Type A [high-rise towers], is repeated eight times, and oriented in a vertical manner fanning out from parcel 22 towards the site's hills. Thirteen Type B buildings [low-rise buildings] are staggered in the northern portion of the site, tapering in towards the center of the site. Five Type E buildings [low-rise buildings] anchor brick paved courts that are formed at the rear of several Type B building pairs. Two Type C units [low-rise buildings] 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. 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.*

**Further Study to inform the Historic Property Description**

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 landscape as part of the historic design.

MHA retained ICF to perform a Character-Defining Feature Study of the 29.8-acre GGV 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/or do not contribute to the historic district's eligibility as a resource.

The 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.<sup>1</sup> 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.). A description of the property, as it relates to this undertaking, was adapted from the Character-

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<sup>1</sup> ICF. 2019. *Character-Defining Features Study*. Prepared for Marin Housing Authority. September.

Defining-Feature Study and is included below. The headers represent the different landscape characteristics that are present within the APE—which are Land Use, Buildings & Structures, and Vegetation,—and the character-defining features that are located within close proximity to the undertaking and have the greatest potential to be affected are listed under each landscape characteristic. These character-defining features help frame the analysis of potential effects under the proposed undertaking:

### ***Land Use***

*Golden Gate Village was built as a multifamily residential public housing development by the Marin Housing Authority as part of the larger Marin City Redevelopment program after World War II.*

*Existing land uses at Golden Gate Village include Multifamily Residential, Recreation, Community Gathering, Administrative/Maintenance, and Commercial.*

*The main recreational area in the northernmost area of the site retains its overall recreational land use, although the specifics have been altered. The baseball field was removed and replaced with a tennis court and a basketball court in the 1974. In 1985, building B-12 was converted from multifamily residential use to commercial use. The building now houses the organization Bridge the Gap.*

#### *Land Use Character-Defining Features Located in the APE:*

- *Multifamily residential use.*

### ***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.*

*Thirteen Type B buildings were constructed at the property, each one comprising eight three-bedroom units. Type B buildings were two stories in height and constructed of reinforced*

*concrete masonry units and wood frame over a concrete foundation. The first story was clad in painted masonry units. Eight entrances to the residential units (two per unit) were located along [each of] the long façades [(with sixteen total entrances)] and were accessed via private patios. Window systems adjoined the entrances. The second story projected in a slight overhang and was clad in redwood siding with vertical battens. The wood siding was treated but [historically] left unpainted in an effort to blend the campus into the neighboring woodland setting. Fenestration on the second story was located over the entrances.*

*The buildings were capped with end-gabled roofs with extended eaves and exposed rafters. The roof contained two clerestory ridge vents. The roofs and the vents were clad in wood shingles. Utilities, including telephone and electrical services, were located at one of the short facades of the buildings within enclosures painted to match the concrete.*

*In 1985, building B-12 was renovated for commercial use. The residential units were redesigned as offices and meeting spaces, and the interior spaces were reconfigured. The exterior of the building underwent the following numerous changes to facilitate the renovation.*

- *New doors and windows throughout [the first floor]*
- *New outdoor staircases [and pedestrian doors] that provided access to the second floor at both gable ends of the building.*
- *A new roof, including a cross-gable addition at the center of the rear (east elevation) façade.*
- *A new second story entrance at the rear (east elevation) of the building accessed via an exterior staircase.*
- *Fill and stucco cladding in former window and door openings.*

A cross-reference check with archived planning and maintenance records at MHA's headquarter confirmed that the second story windows on the primary façade associated with unit 115 were to remain in the 1985 remodel (with new glazing), and some of the unit's rear façade windows were to be entirely replaced (Figure 2). Based on visual inspection, the replacement windows at the second story matched the historic windows. The same 1985 plan set from Clark and Yeats Assoc. Architects confirm that building B-12's north façade at the gable end was altered to include a new pedestrian door and exterior staircase (Figure 3). Lastly, details on the roof replacement show the original wood shingle roof was replaced with fiber glass shingles and that parts of the existing redwood siding and wood soffit was repaired in-kind (Figure 4).

*Low-Rise Buildings Character-Defining Features Located in the APE:*

- *One rectangular-plan building.*
- *Two-story height.*
- *End gabled roofs with exposed rafters*
- *The clerestory ridge [roof form] at building type B.*
- *Concrete and wood frame construction.*



- Redwood siding with vertical batten at building type B.
- The location of utilities at the gable ends of the buildings.

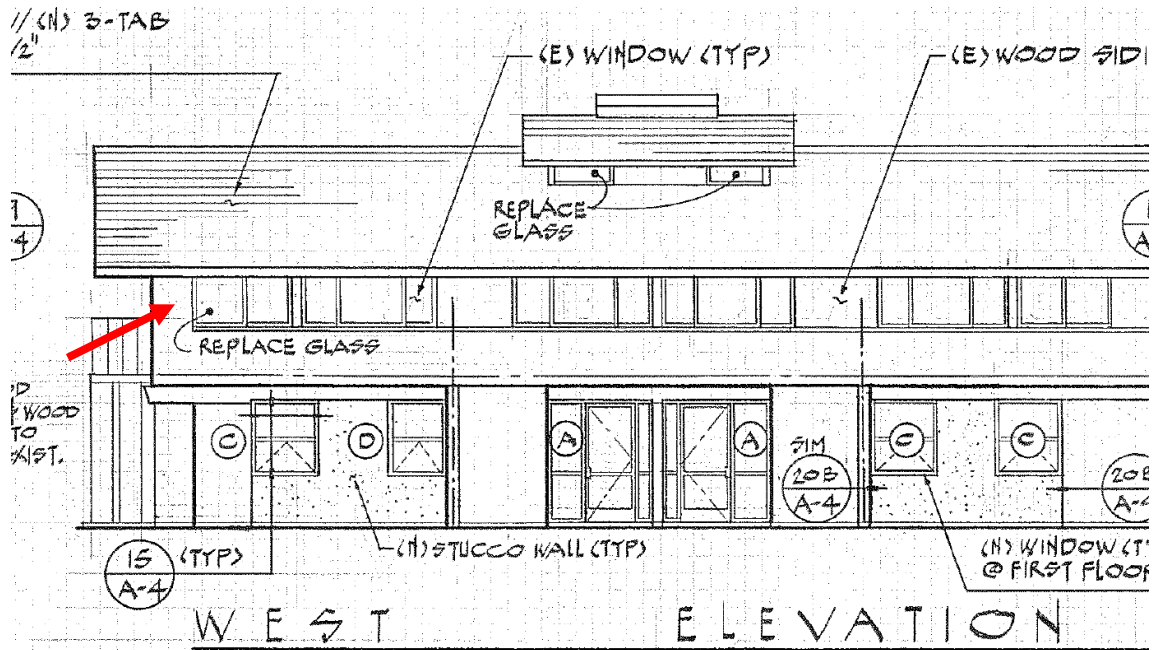


Figure 2: West (primary) elevation of building B-12 showing façade changes from 1985 remodel. Red arrow points to unit 115. Courtesy: MHA Archives, *Remodel-Building B-12 Marin City Housing Cal 52-1 Plans, sheet A-1, 1985.*

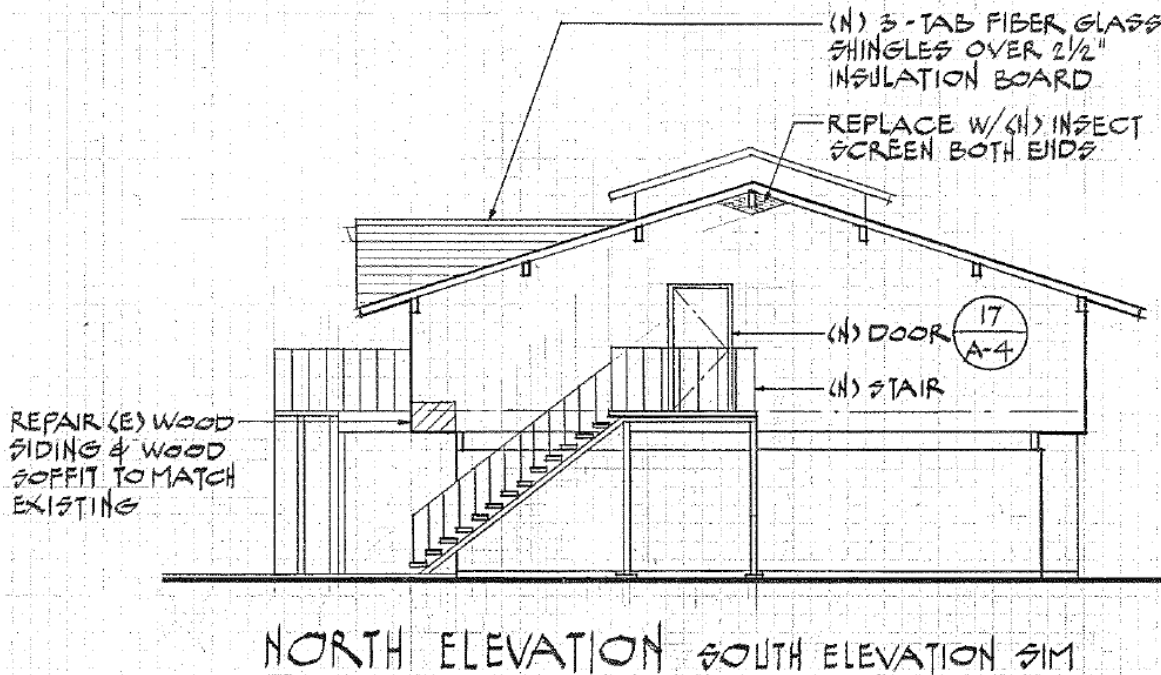


Figure 3: North elevation of building B-12 showing façade changes from 1985 remodel. Unit 115 spans the width of the building. Courtesy: MHA Archives, *Remodel-Building B-12 Marin City Housing Cal 52-1 Plans, sheet A-1, 1985.*

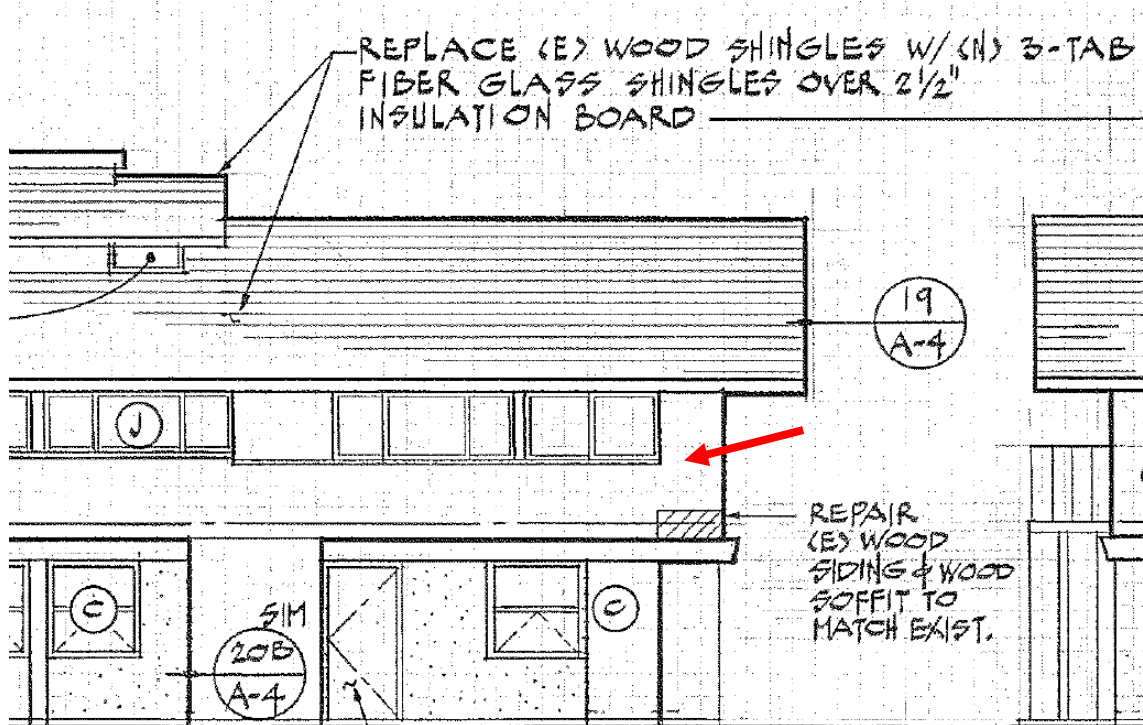


Figure 4: East elevation of building B-12 showing façade changes from 1985 remodel. Red arrow points to unit 115. Courtesy: MHA Archives, *Remodel-Building B-12 Marin City Housing Cal 52-1 Plans, sheet A-1, 1985.*

### Vegetation

The overall landscape design includes the careful grouping of plants to articulate boundaries, accentuate viewsheds, and provide a suburban residential aesthetic. Halprin selected varied tree species that provided a buffer between the more manicured residential areas and the undeveloped and natural open space in the adjacent Marin Headlands and along the eastern boundary of U.S. Highway 101.

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 1958 plant list also included 15 species of deciduous shrubs including one ornamental grass, and provided accent groupings between buildings, privacy hedges around all of the low-rise buildings, and groupings of vegetation along the sloped transition zones.

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 low-rise cluster was primarily planted by a groundcover of typical lawn grass, including in the courtyards. Hedges providing screening and privacy were planted surrounding the low-rise buildings along with deciduous trees. The 1974 plan continued Halprin's design



*intent for vegetated screening surrounding low-rise buildings and vines on the structures between the individual units to create a sense of privacy. Today, remnants of hedges surround the low-rise buildings. The 1974 plan implemented Halprin's design for row of coast redwood along the northern border of the recreational area cluster. Although the coast redwoods were removed with alteration of northern boundary in 1992, today, conifer trees create a partial northern edge, screening the road from the northeastern section of the playground area.*

*Vegetation Character-Defining Features Located in the APE:*

- *Lawn groundcover:*
  - *Manicured character in low-rise and recreational area clusters.*
- *Hedges surrounding low-rise buildings (where remaining).*
- *Vegetation in fenced enclosures of low-rise building units unique to each tenant.*

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

In April 2020 a fire occurred within unit 115 (address: 115 Drake Avenue) on the second floor of building B-12 in GGv. A site plan is included below to illustrate the layout of the complex and building names (Figure 5). Unit 115 in Building B-12 is outlined in red. The repairs will be primarily located at the building's north end, near GGv's north boundary, and at the primary façade at the northwest corner, near the play area to the west (Figure 6), and at the rear façade at the northeast corner near the landscaped slope adjacent to U.S. Highway 101 to the east (Figures 7 and 8). Because the fire did not damage the first floor, all work will be limited to the second story and roof, and no ground disturbance will occur as a result of this undertaking.

**GGV  
 ZENITH  
 VILLAGE**

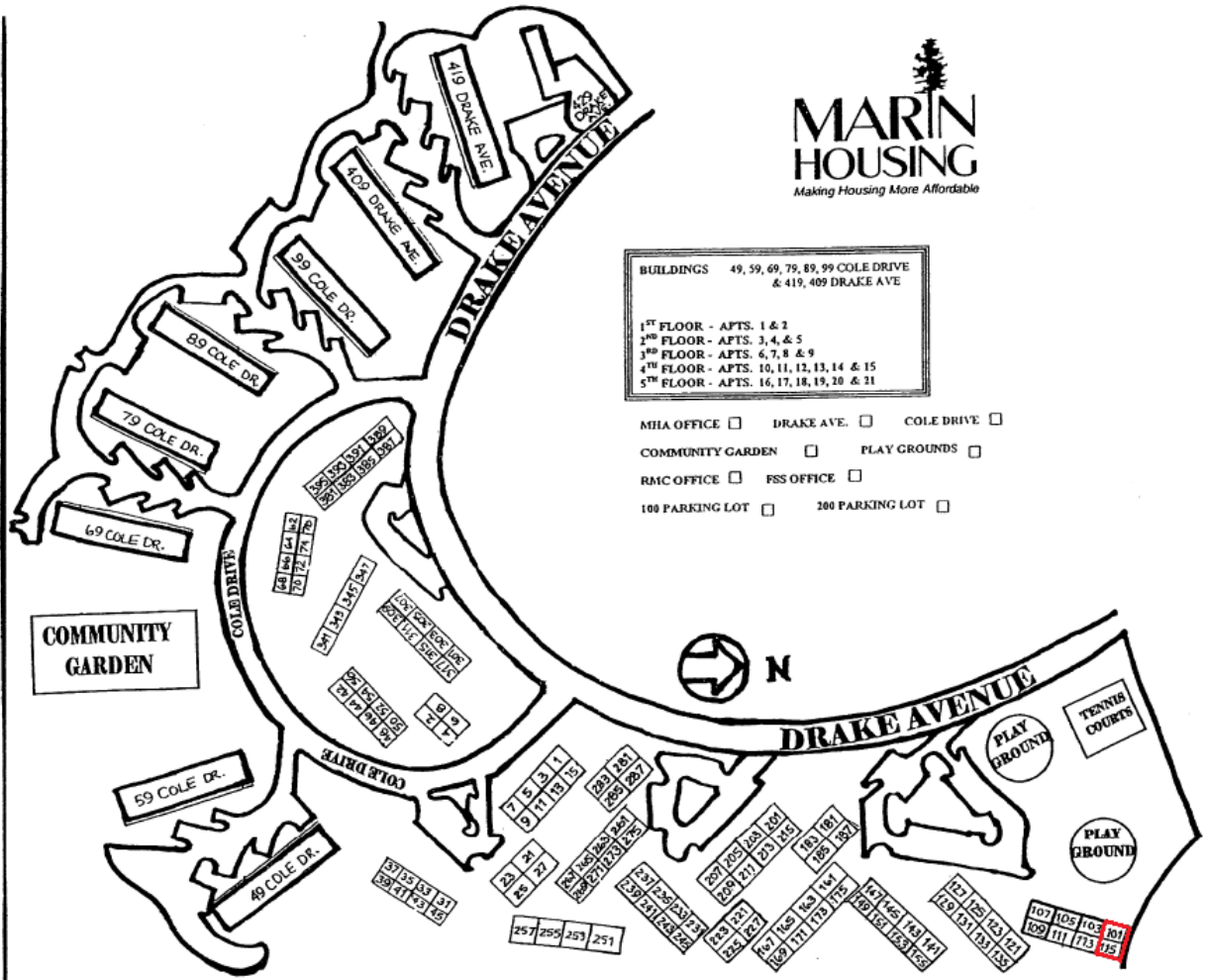


Figure 5: A site plan illustration of GGV. North is right, Highway 101 is to the east; not to scale. Unit 115 is outlined in red, which is on the second story above unit 101. Courtesy: MHA, with illustration by ICF.





**Figure 6: Photograph of low-rise building B-12, primary (west) façade, with approximate location of unit 115 outlined in red, facing east. Source: ICF, 4/10/2019.**



**Figure 7: Photograph of low-rise building B-12, rear (east) façade, with approximate location of unit 115 outlined in red, facing northwest. Source: ICF, 4/10/2019.**





**Figure 8: Photograph of low-rise building B-12, rear (east) façade to the left and sloped landscape to the right, facing north. Source: ICF, 4/10/2019.**

Fire and smoke caused damage to the interior of unit 115 (Figure 9). However, it also damaged the following exterior features: aluminum-frame slider windows on the building's primary (west) and rear (east) façades (Figure 10); part of the roof at the north end of the building (Figure 11); the pedestrian wood door and the staircase on the north façade; and redwood siding concentrated at the building's second story on the primary (west) and north façades at the building's northwest corner, and rear (east) façade at the building's northeast corner.

To repair the damage, Marin Housing Authority will undertake the following scope of work:

- Replace in-kind between eight and ten aluminum sliding windows at the second floor of unit 115, primarily located on the building's north end, the primary façade at the northwest corner, and the rear façade on the northeast corner (some of the windows were replaced in-kind in the 1985 remodel);
- Replace the pedestrian wood door on the north façade (1985 alteration);
- Repaint the staircase on the north façade (1985 alteration);
- Conduct patch repairs to the roof at the building's north end (1985 alteration);
- Conduct in-kind repairs to the exposed rafters at the roof, at the building's north end (historic feature);
- Replace in-kind the damaged redwood siding at the building's north façade, the primary façade at the northwest corner, and the rear façade at the northeast corner (portions of redwood siding replaced in-kind in the 1985 remodel); and
- Repaint in-kind the exterior of unit 115 at the primary, north, and rear facades (historic feature).



**Figure 9: Photograph of interior of unit 115, with smoke damage at the windows, building walls, and roof. Source: MHA, received by ICF on 5/19/2020.**



**Figure 10: Photograph of low-rise building B-12 showing the exterior of unit 115 at the rear façade, facing southwest, with smoke damage at the windows and eaves. Source: MHA, received by ICF on 5/19/2020.**





**Figure 11: Photograph of building B-12 showing the exterior of unit 115, roof and siding damage at the primary (west) and north façades, facing southeast. Source: MHA, received by ICF on 5/19/2020.**

## **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 allows 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.

In determining if the proposed undertaking has the potential to affect the NRHP-listed historic district, ICF reviewed the proposed project documents described previously and photographs of

Low-Rise Building B-12 and surrounding site.<sup>23</sup> This memorandum analyzes the proposed scope of work's compliance to the Secretary's Standards for Rehabilitation.

### **ANALYSIS OF THE UNDERTAKING UNDER THE SECRETARY'S STANDARDS FOR REHABILITATION**

*Standard 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:** The undertaking constitutes no change in the use of the historic property. Building B-12 was originally constructed as a residential low-rise building and the building was remodeled in 1985 to accommodate a commercial use on the first floor. Following repair of unit 115, the building would continue to be used as commercial space on the first floor and residential space on the second story.

The proposed undertaking is limited to in-kind replacement of damaged features. Additionally, the undertaking is confined to the second floor and the exterior stair at the building's north façade. Overall, these repairs are minimal and do not require changes to its distinctive materials, features, spaces, and spatial relationships. Therefore, the undertaking complies with Standard 1.

*Standard 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 undertaking would require patch repairs to the roof, in-kind replacement of eight to ten aluminum sliding windows, in-kind replacement of redwood siding, and in-kind repairs to the rafters at the roof. The north façade pedestrian door and exterior stair were added during the 1985 remodel of building B-12 and are not distinctive nor do they characterize the historic property. This work would repair the fire damage and replace damaged features in-kind, which would allow the historic character of the property to be retained and preserved and allow building B-12 to retain its character as a low-rise building within the historic district. Therefore, the undertaking complies with Standard 2.

*Standard 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:** Interior and exterior repairs to unit 115 would not create a false sense of historical development. At the north end of building B-12, the replacement of windows and select redwood siding, as well as rafter repairs and repainting of all three exterior facades of unit 115, would be conducted in-kind and therefore would match the extant materials of the building. The roof and pedestrian door, while not historic, will be repaired in-kind to match

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<sup>2</sup> Due COVID-19 shelter-in-place orders at the time ICF prepared the current FOE, the project site could not be accessed.

<sup>3</sup> Analysis regarding the interior repairs at Unit 115 is not required under Section 106.

the building as it existed when the property was evaluated and listed on the National Register of Historic Places. Additionally, the exterior staircase at the north façade, which was a later addition, will be repainted to match. There are no conjectural elements proposed for the undertaking; therefore, the undertaking complies with Standard 3.

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

**Comment:** Changes to Building B-12 are limited to replacement and repair of a portion of redwood siding, roof shingles, and the north façade pedestrian door and exterior stair. Some of these features were altered to their current appearance in 1985, and these changes are compatible with the historic character of the property and have not acquired significance. Therefore, Standard 4 does not apply.

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

**Comment:** The undertaking would preserve the distinctive materials and finishes present at low-rise Building B-12. Exterior repairs to the building's north end would be focused on areas that were damaged during the fire and would include in-kind replacement and repainting of siding at the primary, north, and rear facades; in-kind window replacement on the primary and rear facades; patch repairs to the roof, including the in-kind repair of the exposed rafters; replacement of a single pedestrian door; and repainting of the staircase to match at the north façade.

Damaged siding and rafters at the building's northeast and northwest corners, along with the north façade, will be replaced and repainted in-kind and would match the material and texture as the adjacent historic siding, which is consistent with historic construction techniques and finishes. Additionally, the windows would be replaced in-kind with manufactured aluminum-frame windows fitted to historic site-specifications. Overall, the distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved. Therefore, the undertaking complies with Standard 5.

*Standard 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 proposed undertaking will repair and replace fire damaged historic features including: in-kind replacement and repainting areas of redwood siding on portions of the primary, rear, and north facades; in-kind replacement of the aluminum sliding windows with new windows manufactured to match the historic specifications, including the original aluminum material for the frames, original window dimensions and profile; and the rafters will be repaired in-kind to match the historic material. Overall, only the features that are irreparably damaged as a result of the fire will be removed and replaced, and all historic

features will be replaced in-kind. Replacement of missing features will be substantiated by documentary and physical evidence, including historic plans of building B-12 and site photos. Therefore, the undertaking complies with Standard 6.

*Standard 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:** The undertaking does not include the use of chemical or physical treatments. Therefore, Standard 7 does not apply.

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

**Comment:** The proposed undertaking does not include ground disturbing activities and does not have the potential to disturb archeological resources. Therefore, Standard 8 does not apply.

*Standard 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 be limited to interior and exterior alterations to repair the fire damage that occurred in unit 115 at the north end of building B-12, specifically at the building's west, east, and north façades and roof. Historic features that were damaged by the fire and will be repaired by the undertaking are limited to a small area of redwood siding at the north end of the low-rise building, aluminum sliding windows, and a portion of the building's rafters. The damaged historic materials will be replaced in-kind and the historic character of the property will be retained. Non-historic features that were damaged by the fire and will be repaired by the undertaking are also limited to the north end of the low-rise building, which include pedestrian wood door and staircase, and roof. These damaged features will be repaired and replaced. The undertaking does not introduce any new additions or related new construction and will not any spatial relationships that characterize the property. Therefore, the undertaking complies with Standard 9.

*Standard 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 does not include any new additions or new construction. Therefore, the Standard 10 does not apply.

### **Summary of Analysis**

In summary, the proposed undertaking will repair fire damaged features and will retain the historic character of the unit. Fire damage repairs to building B-12 would be mostly concentrated at the interior of the building. Exterior repairs would be located at the building's north end,

concealed from most exterior vantage points, and in-kind materials would be used to repair historic features, such as the redwood siding. Features that were altered in 1985, including the exterior stairs and roofing materials, will also be replaced in-kind to ensure compatible and consistent materials throughout the unit. As such, the undertaking will retain the historic character of unit 115, which is a contributing feature of the GGV historic district and the undertaking complies with the Secretary of the Interior's Standards.

#### **IV. FINDING OF EFFECT**

The proposed undertaking would conform to the Secretary of the Interior's Standards for Rehabilitation and would result in *no adverse effect* on the identified historic property. The proposed undertaking would not diminish the historic property's eligibility for the NRHP.

#### **VI. REFERENCES**

Clark and Yates Assoc. Architects

1985 *Remodel of Building B-12*. Marin Housing Authority onsite Archives.

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.*

Marin Housing Authority

2019 *Character-Defining Features 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.