

FINDING OF EFFECT MEMORANDUM

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

March 4, 2021

I. PROJECT OVERVIEW

Historic Property: Golden Gate Village
Project Name: Pine Tree Removal & Replacement and Playground Mulch
Street Address: 101–429 Drake Avenue & 1–69 Cole Drive, 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: Evan Smith, Marin Housing Authority

Project Documents Reviewed:

- 1958 Landscape Planting Plans for the Marin Housing Authority, Marin City, prepared by Lawrence Halprin, John Carl Warnecke, and Aaron G. Green.
- 1974 Landscape Planting Plans for the Marin Housing Authority, Marin City, prepared by Crawford & Banning Architects and Richard Julin & Associates Landscape Architects.
- 2017 National Register of Historic Places Registration Form prepared by Daniel Ruark.

ICF is conducting a review of the undertaking at the above-referenced address under Section 106 of the National Historic Preservation Act. The Marin Housing Authority (MHA) proposes removing three dead Monterey pine trees that represent a significant health and safety concern. The trees are in the parking island across from 127–155 Drake Avenue (B-10). MHA will replace the removed trees in kind with Monterey pines. MHA also proposes installing certified playground mulch at the small playground across from 107–115 Drake Avenue (B-12). ICF is carrying out this Section 106 review as MHA’s historic preservation consultant.

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

The purpose of this Finding of Effect memorandum is to determine what effects, if any, the undertaking will have on the identified historic property.

II. AREA OF POTENTIAL EFFECT

The subject undertaking will remove three dead Monterey pine trees in the parking island across from 127–155 Drake Avenue. MHA will replace the removed trees in kind with Monterey pines. MHA also proposes installing certified playground mulch at the small playground across from 107–

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115 Drake Avenue. Monterey pines (*Pinus radiata*), Canary Island pines (*Pinus canariensis*), and Eldarica pines (*Pinus eldarica*) are not widely planted in the Golden Gate Village Historic District but are present in few areas, including the base of buildings 49 and 59, along the northern boundary of the recreational clusters, and along U.S. 101. Lawrence Halprin’s 1958 landscape plan calls for five sycamores (*Platanus acerifolia*) to be planted in the parking lot island across from 127–155 Drake Avenue. Landscape plans from 1974 call for the planting of nine sycamores in the parking lot island. In the 1992 rehabilitation plans for the children’s play area, 10 trees are depicted in the parking island; they appear to be labeled as “poplars.” To fully evaluate direct and indirect effects, the Area of Potential Effect for this undertaking is the boundary of the entire historic district.

III. DESCRIPTION OF HISTORIC PROPERTY

Golden Gate Village is at 101–429 Drake Avenue and 1–99 Cole Drive in Marin City, California. The property is historically significant under the areas of social history, community planning and development, architecture, and landscape architecture. The residential complex was designed by architects Aaron Green and John Carl Warnecke and landscape architect Lawrence Halprin ca. 1955–1960. The property was listed in the NRHP on August 3, 2017, as the Marin City Public Housing Historic District. The NRHP nomination is available online at the California Office of Historic Preservation website. Per the NRHP nomination form, the historic district includes 29 contributing buildings and one contributing site, a historic landscape designed by Halprin that includes vegetation as well as circulation, topographic, and water features.

IV. SCOPE OF WORK

MHA proposes removing and replacing three Monterey pine trees in the parking island across from 127–155 Drake Avenue. According to an arborist with BrightView Tree Care Services, the project will consist of removing the three Monterey pines by cutting as low to the ground as possible. No stump grinding will occur. These failed trees are already dead and pose a risk to both property and health and safety (personal communication, Gerald Pingrey). MHA proposes planting the three Monterey pines directly adjacent to the area where the trees will be removed. In addition, MHA proposes installing certified playground mulch at the small playground across from B-12. Certified playground mulch consists of engineered wood fiber free of sharp materials and harmful chemicals. Mulch must meet specific requirements set by the American Society for Testing Materials (ASTM) and is tested to ensure the mulch meets or exceeds those standards. Additionally, the International Play International Play Equipment Manufacturers Association (IPEMA) certification process uses a third-party to test mulch materials and oversees the process, validating the playground surface material to ensure it meets or exceeds standards set by the ASTM. If these standards are met, the product receives IPEMA certification.

Installation of the new trees and mulch will require minimal ground disturbance. These areas were regraded during construction of Golden Gate Village. No archaeological resources are anticipated to be disturbed as a result of this undertaking. However, in the event of an unanticipated discovery, the contractor will halt work and contact MHA. The area will be protected and avoided until MHA has contacted a qualified professional archaeologist to assess the discovery and provide appropriate recommendations. If the discovery is determined to be potentially significant, the archaeologist will develop a treatment plan, which could include site avoidance, capping, or data recovery. If the

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discovery is associated with Native American practices or traditions, the treatment plan will be developed in coordination with the Federated Indians of Graton Rancheria and by notification with other appropriate tribes as requested.



Figure 1. This figure depicts one of the Monterey pines proposed for removal by MHA. Source: MHA, 2020.

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Figure 2. This figure depicts one of the Monterey pines proposed for removal by MHA. Source: MHA, 2020.

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Figure 3. This figure depicts the parking island with both healthy (foreground) and failing Monterey pines (background). Source: ICF, 2019.

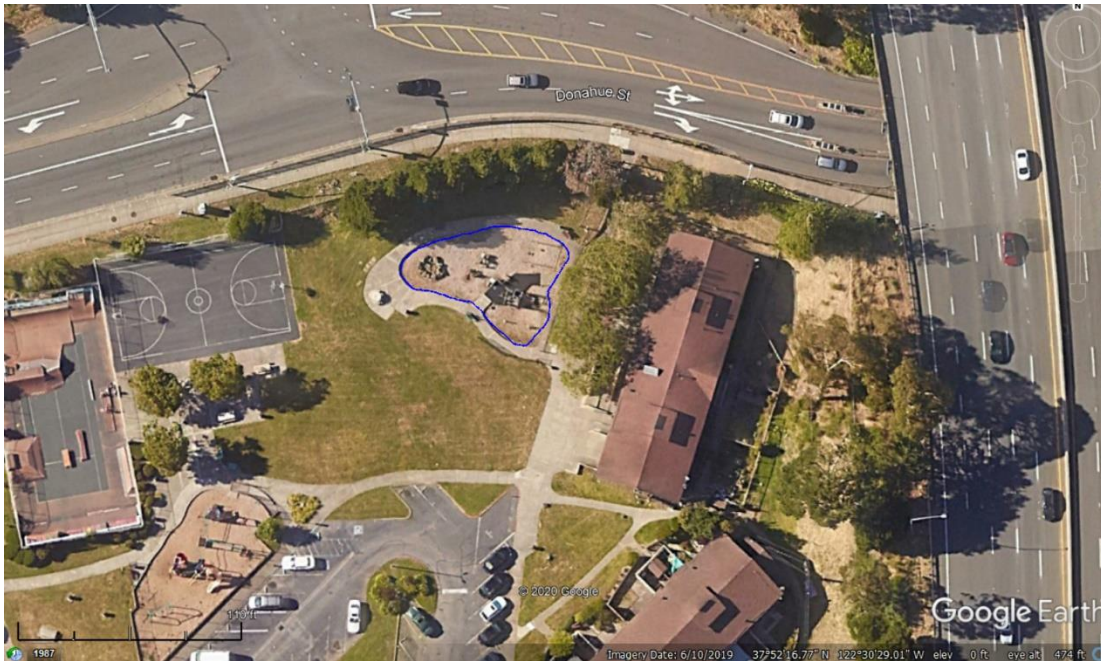


Figure 4. This figure depicts the playground (outlined in blue) in which MHA proposes to install certified playground mulch. Source: Google Earth, 2021.

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V. PROJECT ANALYSIS

In 2017, the Marin City Public Housing Historic District (Golden Gate Village) was listed in the NRHP under Criteria A (events) and C (design). The nomination included 29 contributing buildings and one contributing site. The nomination provides information about landscape features within the historic district as well as a chronology regarding physical development of the property. It also evaluates the physical features present at the property and categorizes them as contributing or non-contributing features within the historic district. The nomination prepared for Golden Gate Village, in conjunction with plans from Lawrence Halprin (1958) and Richard Julin (1974), provides the necessary data for conducting Section 106 reviews of undertakings at the property.

Monterey Pines

Halprin's 1958 planting plans for Golden Gate Village included 19 species of deciduous and coniferous trees. The plans called for plantings around the property's edges, at entrances, along roadways and parking areas, and within communal areas of the campus. A sketch from Halprin's landscape plan depicts a pine tree in relation to the understory and groundcover; however, pines were not widely included in the plan. Although Halprin listed Monterey and Canary Island pines in his plan, the plantings appear to have been limited to areas around the base of the high-rise buildings, along the northern boundary of the recreational cluster, and along U.S. 101. The 1958 plan also proposes planting five sycamores in the parking island across from 127–155 Drake Avenue. The 1958 plans for the site, however, did not reflect the as-built condition, as evidenced in photographs from the 2017 nomination.

The 1974 Julin plans indicate a large planting effort that was greatly influenced by Halprin's design with respect to plant selection and layout. It is of particular note, however, that the 1958 and 1974 plans are different enough to suggest that the 1974 plans were not a full-on replica or exact continuation of Halprin's intended design. For example, in the Julin plan, nine sycamore trees are proposed to be planted in the parking island that is the subject of the current undertaking.

The nomination did not identify any specific Monterey pine trees as contributing to the historic district. Both Monterey and Canary Island pines were sparsely used in Halprin's 1958 plans and were not proposed to be used in the vegetated parking island across from 127–155 Drake Avenue. Of the 416 proposed tree plantings in the Julin plan, only 23 were Monterey pines; Canary Island pines were not listed in the Julin plan's plant list.

Although Halprin's 1958 plans called for both Monterey and Canary Island pine trees to be planted, research performed for this memo confirmed that their location was limited to the base of buildings 49 and 59, along the northern boundary of the recreational clusters, and along U.S. 101. The Julin plan proposed only Monterey pines, mostly between the low-rise buildings, along the pathways and parking lots, and along Cole Drive. The placement of the failing Monterey pines proposed for removal, apparently planted outside the period of significance for the Marin City Public Housing Historic District, 1957 to 1964, differs significantly from Halprin's original plan as well as the Julin plan. Ultimately, these landscape plans do not indicate with great certainty what trees were planted on the island over time or when the Monterey pines that currently occupy the space were planted. It is more certain, however, that the three dead

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Monterey pines proposed for removal do not appear to be part of a unified planting plan, and they were not identified as contributing features of the historic district in the 2017 NRHP registration form. The two plans are illustrated in Figure 5.

Available historical aerials suggest that trees were planted in the parking island between 1968 and 1982; however, the resolution of the aerials is too poor to determine the number of trees planted or the type. Although still difficult to interpret, a 1987 aerial does seem to suggest that 10 trees were present, which corresponds to the number of trees depicted in the 1992 rehabilitation plans for the children’s play area. By 2002, the aerials depict approximately eight trees, two of which were gone by 2013. At the time of documentation, six Monterey pines, including the three to be removed, remained (Nationwide Environmental Title Research 1968, 1982; Google Earth 2002, 2013).

Playground

The Halprin plan proposes a children’s play area or recreational cluster near B-11 and B-12 (Figure 6). The 1958 plans depict a baseball diamond with playground equipment and meandering paths. Although this area still functions as recreational space, the layout has been redesigned since the 1958 plans were drawn. Starting in 1974, the Julin plans propose replacement of the baseball diamond with a basketball and tennis court (Figure 6). Rehabilitation plans associated with realignment of Donahue Road in 1992 depict the playground much as it is today but with differences concerning playground configuration, circulation patterns, picnic tables, and barbecue pits (Figure 6). With this rehabilitation, much of the trees and vegetation in the recreational cluster changed. Aerial imagery shows that, by August 2014, the tennis court was repurposed as a skate park (Figure 6 [Google Earth 2014]). Both the plans and aerial imagery suggest that the playground area has been heavily modified, beginning in 1974. In addition, the playground was not identified as a contributing feature of the historic district in the 2017 NRHP form.

VI. PROJECT CONFORMANCE WITH THE SECRETARY OF THE INTERIOR’S STANDARDS FOR THE TREATMENT OF HISTORIC PROPERTIES

ICF has completed its review of the applicable project documents for the undertaking to determine conformance with the Secretary’s Standards. As described above, the scope of work involves the removal of three dead Monterey pines in the parking island across from 127–155 Drake Avenue. MHA will replace the removed trees in kind with Monterey pines. MHA also proposes installing certified playground mulch at the small playground across from 107–115 Drake Avenue.

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 Code of Federal Regulations 800.5. An adverse effect on a historic property occurs if a project impairs the characteristics that qualify the property for inclusion in the NRHP. 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’s Standards. In the following section, each standard is listed along with a brief analysis of whether or not the subject undertaking is compliant with that standard.

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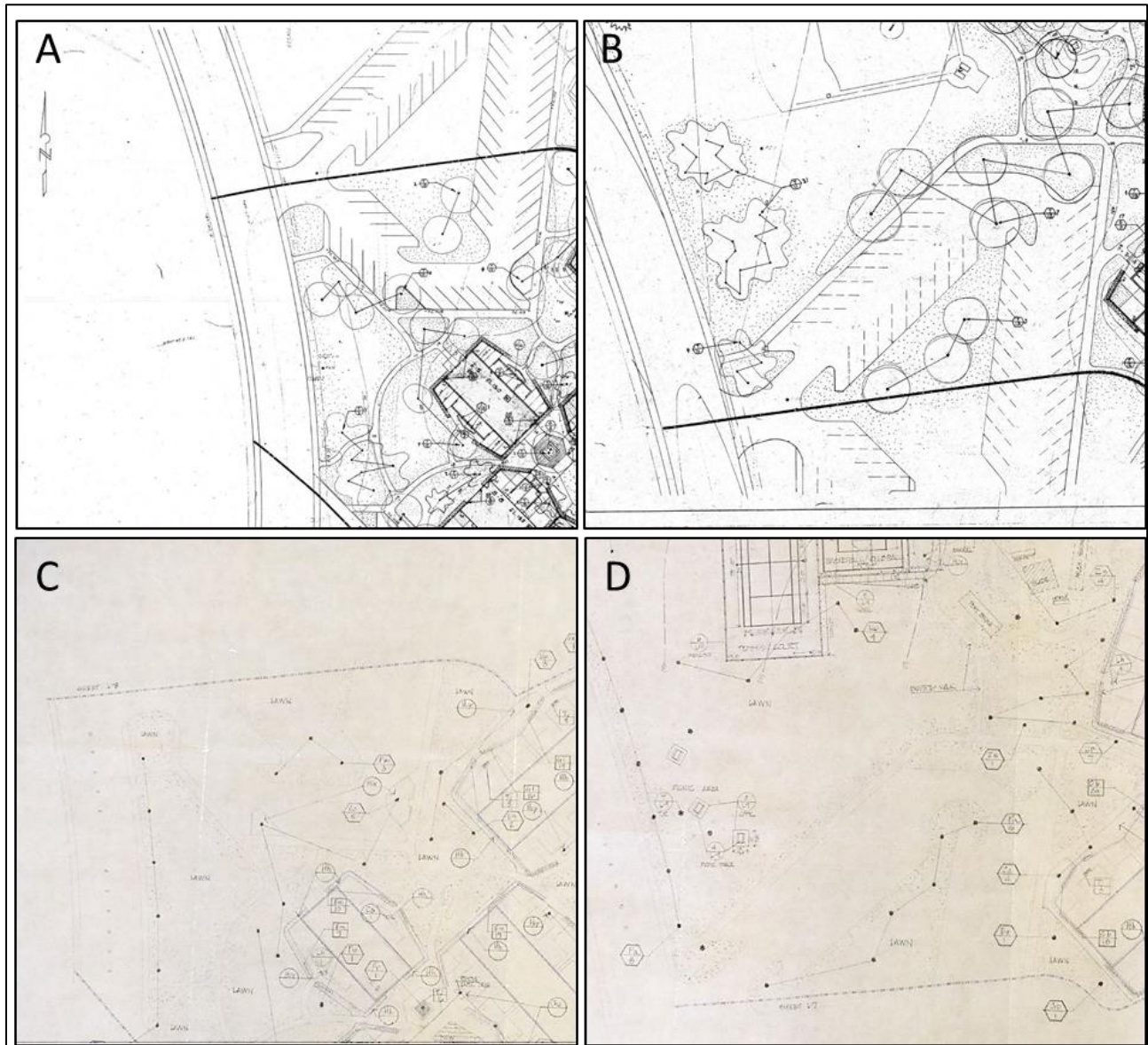


Figure 5. Squares A and B depict the southern and northern portions, respectively, of the parking island and the proposed five sycamore trees in Halprin's 1958 plan. Squares C and D depict the southern and northern portions, respectively, of the parking island and the proposed nine sycamore trees in the 1974 Julin plan.

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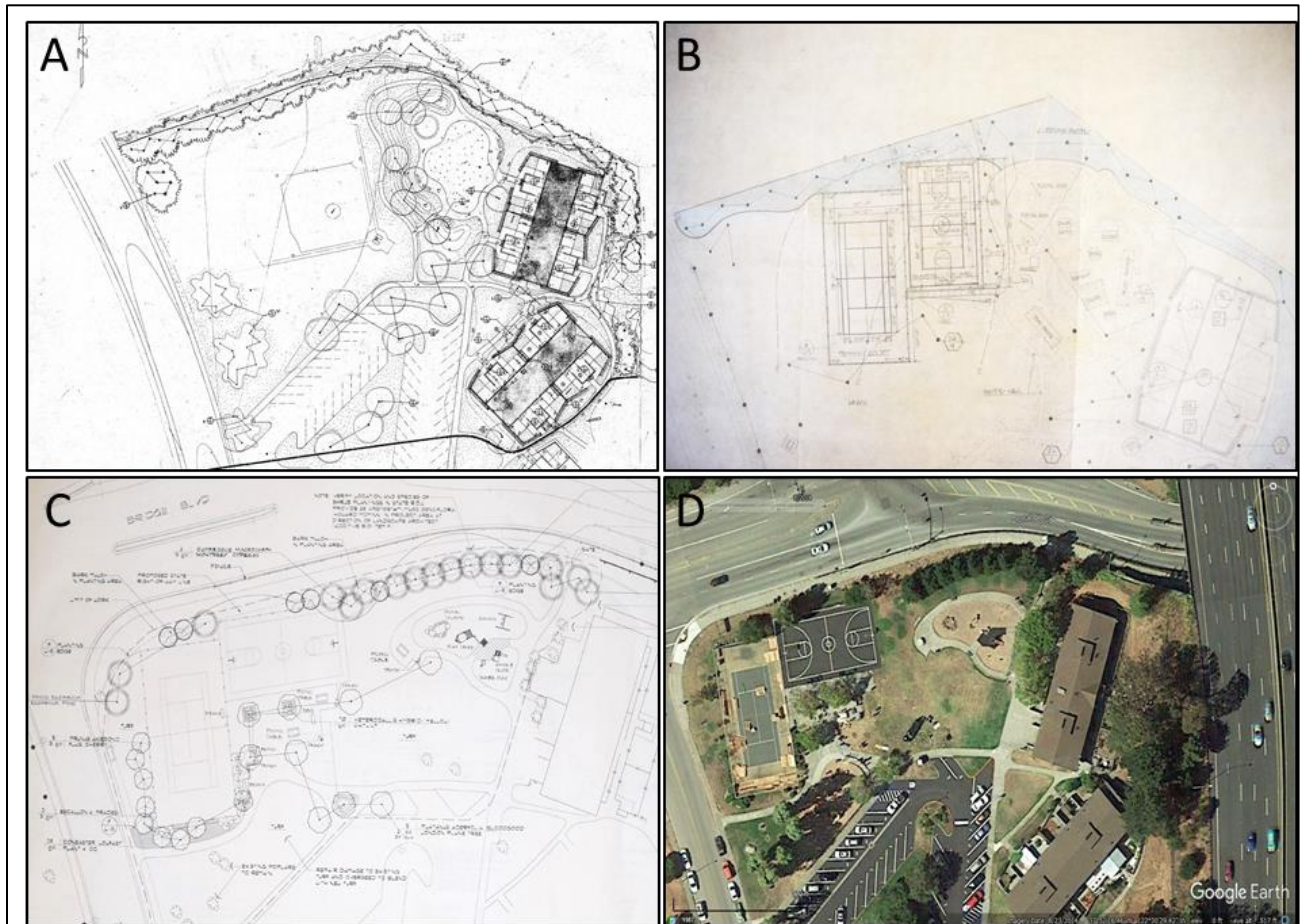


Figure 6. Square A depicts the recreational cluster in the 1958 plans, Square B depicts the recreational cluster in the 1974 plans, Square C depicts the recreational cluster in the 1992 rehabilitation plans, and Square D depicts the recreational cluster in an August 2014 aerial photograph with the first ramps of the skate park visible.

Analysis of the Undertaking Under the Secretary’s Standards for Rehabilitation

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

Comment: The undertaking will not result in a change in use at the historic property. Therefore, the undertaking is compliant with Standard 1.

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

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Comment: The undertaking will remove and replace three dead Monterey pine trees, which were not identified in 2017 as contributing to the Golden Gate Village Historic District. Planted outside the district’s period of significance, the trees do not express Halprin’s original design intent with respect to the selected tree species and locations at the site, nor do these trees echo the 1974 Julin plan. Although these trees do not contribute to the historic district, MHA proposes planting three Monterey pines as in-kind replacements for the trees that will be removed. According to National Park Service guidance on cultural landscapes:

Trees in cultural landscapes are living resources that have determinate life spans. Similar to other living organisms, trees progress through juvenile, mature, and senescent stages. Eventually, even with the best of care, they will inevitably deteriorate and die. Field conservation techniques can extend the lifespan of individual trees, but ultimately specimens will need to be removed from the landscape. (National Park Service N.D.)

In cases with significant or contributing trees, the replacement of trees would consider the original species, the character, and the locations of the deteriorated trees to ensure that overall character and spatial relationships are maintained. Although not required, because the three failing pines are not historic, MHA’s proposal to replace the trees with younger trees of the same species and in the same locations represents an appropriate in-kind replacement that retains the character of the property at the time it was designated in 2017. Distinctive materials will not be altered or removed under this project. Thus, the undertaking is compliant with Standard 2.

MHA also proposes installing certified playground mulch at the small playground across from 107-115 Drake Avenue. The playground area to be mulched has been heavily modified, beginning in 1974, and has not been identified as contributing to the historic district. Thus, the undertaking is compliant with Standard 2.

3. *Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.*

Comment: The undertaking will not involve any changes or conjectural elements that could result in a false sense of historical development. Therefore, the undertaking is compliant with Standard 3.

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

Comment: The undertaking will remove three failing Monterey pine trees that post-date the period of significance and have not been identified as contributing to the historic district. In addition, they were planted outside of Halprin’s original design intent for this location. Regardless, the undertaking will replace the trees in kind,

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maintaining the species and locations of these trees such that they will be compatible with the overall feeling of the historic district. The Monterey pines are not linked to any significant patterns of history, events, or people and have very likely been planted within the last 50 years; therefore, they do not meet the age criterion required to have gained significance in their own right. As such, the undertaking is compliant with Standard 4.

MHA also proposes installing certified playground mulch at the small playground across from 107–115 Drake Avenue. The playground area to be mulched has been heavily modified since 1974 and has not been identified as contributing to the historic district. Similar to the Monterey pines, the current playground layout and equipment were not shown to have gained significance in their own right and do not meet the 50-year age criterion, having been heavily modified in 1992. As such, the undertaking is compliant with Standard 4.

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

Comment: The undertaking will result in the replacement of three failing Monterey pine trees that do not contribute to the overall eligibility of the Golden Gate Village Historic District. Regardless, MHA proposes replacing the Monterey pines in kind. Doing so will maintain the overall feeling of the historic district as well as the landscape that characterizes the property. Because the Monterey pines are non-contributing to the historic district, they do not represent distinctive materials, features, or finishes; as such, the undertaking is compliant with Standard 5.

MHA also proposes installing certified playground mulch at the small playground across from 107–115 Drake Avenue. The playground area to be mulched has been heavily modified since 1974 and has not been identified as contributing to the historic district. The playground does not contribute to the historic district and is not representative of distinctive materials, features, or finishes that characterize the property. Thus, the undertaking is compliant with Standard 5.

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

Comment: The undertaking will remove three failing Monterey pine trees that, according to a professional arborist, are considered a safety hazard. MHA proposes planting three Monterey pines to replace those removed. Despite the fact that these are non-contributing trees, the in-kind replacement with new trees of the same species and in the same locations is consistent with the Secretary’s Standards. Although unnecessary in this instance, the replacement trees will be the same species as the removed trees and thus “will match the old in design, color, texture and ... materials.” Therefore, the undertaking is compliant with Standard 6.

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MHA also proposes installing certified playground mulch at the small playground across from 107–115 Drake Avenue. The playground area to be mulched has been heavily modified starting in 1974 and has not been identified as contributing to the historic district. The playground cannot be considered a historic feature; therefore, the installation of mulch does not represent the replacement of a distinctive feature or material. Because installation would not involve repairing any deteriorated historic feature, the undertaking is compliant with Standard 6.

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

Comment: The undertaking will use certified playground mulch that must be free of sharp material and harmful chemicals in order to secure certification. As such, undertaking will not use chemical or physical treatments on historic materials and Standard 7 does not apply.

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

Comment: Because of past disturbance in the area, no archeological resources are anticipated to be uncovered or disturbed as a result of the proposed undertaking. However, in the event of an unanticipated discovery, work will be halted and appropriate mitigation measures will be identified in a treatment plan. Therefore, the undertaking is compliant with Standard 8.

9. *New additions, 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 undertaking will not involve any new additions, exterior alterations, or related new construction. In replacing the Monterey pines and installing mulch in the playground, spatial relationships throughout the district will be maintained. Therefore, the undertaking is compliant with Standard 9.

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 undertaking will not involve any new structural additions or related new construction. The addition of three new Monterey pines to replace those removed and the installation of certified playground mulch will leave the essential form and integrity of the historic district intact. Therefore, the undertaking is compliant with Standard 10.

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As described above, the undertaking is compliant with Secretary’s Standards.

VI. FINDING OF EFFECT

ICF has determined that the undertaking would conform to the Secretary’s Standards. MHA proposes removing three dead Monterey pine trees because they represent a significant health and safety concern. These trees are in the parking island across from 127–155 Drake Avenue. MHA will replace the removed trees in kind with Monterey pines. MHA also proposes installing certified playground mulch at the small playground across from 107–115 Drake Avenue. Both the failing Monterey pines and the playground are considered to be non-contributing features of the Golden Gate Village Historic District. Regardless, the trees will be replaced with healthy trees of the same species and in the current locations such that they will be compatible with the overall feeling of the historic district. In addition, the in-kind replacement of the surface material at the playground will maintain the existing character of this area and the overall feeling of the historic district. Therefore, the undertaking is compliant with the Secretary’s Standards, resulting in a finding of *no adverse effect* on historic properties.

V. REFERENCES

Google Earth

- 2002 Historical aerial photograph. Available: <https://www.google.com/earth/versions/>. Accessed: January. 5, 2021.
- 2013 Historical aerial photograph. Available: <https://www.google.com/earth/versions/>. Accessed: January. 5, 2021.
- 2014 Historical aerial photograph. Available: <https://www.google.com/earth/versions/>. Accessed: January. 5, 2021.
- 2021 Historical aerial photograph. Available: <https://www.google.com/earth/versions/>. Accessed: January. 5, 2021.

Marin Housing Authority

- N.D. Construction documents located in MHA’s onsite archives, including 1958 and 1974 landscape plans.

National Park Service

- N.D. “Replacing Trees in Cultural Landscapes.” *Clippings: Concepts and Techniques for Maintaining Cultural Landscapes*. Available: <https://irma.nps.gov/DataStore/DownloadFile/561516>. November 30, 2020.

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