

March 3, 2023



4020 Civic Center Drive
San Rafael, CA 94903-4173

**Subject: Section 106 review for Trenching for Parking Lot 1
Lighting**

Dear Consulting Parties:

You have previously expressed an interest in consulting on proposed undertakings related to Golden Gate Village (GGV). As you know, GGV is listed in the National Register of Historic Places. It is, therefore, a historic property for the purpose of Section 106 of the National Historic Preservation Act (Section 106).

For the undertaking, Marin Housing Authority (MHA) proposes to trench for electrical conduit between Building B-12 and the existing pole lights at Parking Lot 1. The proposed trenching route would cut through and cross two sections of concrete sidewalk approximately 10-feet and 6-feet and one section of parking lot 18-feet across. Sidewalks would be repaired with in-kind materials to match adjacent slabs. Junction boxes would be installed as necessary in the triangular Parking Lot 1 grassy island. MHA has concluded that the proposed undertaking would not cause an adverse effect on the historic property. Please see the attached Finding of Effect Memorandum (FOE) for a detailed analysis supporting this conclusion.

With the assistance of its Secretary of the Interior Standards (SOIS)-qualified consultant, MHA has assessed the proposed undertaking at GGV to determine its potential for adverse effect through the application of the Criteria of Adverse Effect (36 CFR 800.5(1)).

This finding is being issued for consulting party comment at this time. We request your written comment within 30 days of posting via email to the following address: ggvpubliccomment@marincounty.org.

Sincerely,



Michael Cutchin
MHA

Enclosures

Finding of Effect Memorandum

Housing Authority of
The County of Marin

415/491-2525

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www.marinhousing.org



Finding of Effect Memorandum

To:	Tammy Taylor, CDA; Molly Kron, CDA
From:	Michael Cutchin, MHA; Adrian Chorley, MHA
Date:	March 03, 2023
Re:	Trenching for Conduit at Parking Lot 1

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

PROJECT OVERVIEW

Historic Property: Golden Gate Village

Project Name: Trenching for Conduit at Parking Lot 1

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: Michael Cutchin, Marin Housing Authority

ICF 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 trench for electrical conduit between Building B-12 and the existing pole lights at Parking Lot 1. The proposed trenching route cuts through and crosses two sections of concrete sidewalk approximately 10-feet and 6-feet and one section of parking lot 18-feet across. Sidewalks and asphalt would be repaired in-kind to match adjacent materials. Junction boxes would be installed as necessary in the triangular Parking Lot 1 grassy island. Trenching would be done with a trenching machine with work being completed in approximately five working days (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. 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, ICF 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 trenching along a route from Building B-12, crossing two sidewalks and a segment of pavement in Parking Lot 1. Both the 2019 Character-Defining Feature Study and the 2017 Nomination form emphasize how the landscapes, buildings, open spaces, community spaces, circulation patterns, and their spatial relationships contribute to the historical significance of GGV. 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 Marinship 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 NR 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 trenching a route for conduit between Building B-12 and the existing pole lights at Parking Lot 1. The proposed route would involve crossing two sections of sidewalk 10-feet and 6-feet in width and one section of parking lot 18-feet across (Photo 1). MHA proposes replacing affected concrete sidewalks and asphalt segments of parking lot with in-kind materials (Photos 2 and 3). The grassy landscaped area within the triangular island of Parking Lot 1 would have junction boxes installed, as needed (Photos 4-7). The trenching would be completed using a trenching machine and entire process is estimated to take five business days.

The area was graded during the construction of GGV, and no known archaeological resources are located within the APE.



Photo 1 Proposed location and route of trenching for conduit. Building B-12 at top-right, recreational cluster at top-left. Source: MHA, 2023.



Photo 2 Existing sidewalk along the proposed trenching route, looking east. Source: MHA, 2023.



Photo 3 Existing sidewalk along the proposed trenching route, looking southwest. Source: MHA, 2023.



Photo 4 Landscaped island in Parking Lot 1 with existing light pole in background, looking south. Source: MHA, 2023.



Photo 5 Landscaped island in Parking Lot 1 and existing light pole, looking southwest. Source: MHA, 2023.



Photo 6 Landscaped island looking towards Building B-12 with existing light pole at left, looking northeast. Source: MHA, 2023.



Photo 7 Example of an in-ground junction box. Source: MHA, 2023.

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.

Parking Lots and Vegetated Islands

The CDF Study notes that the five triangle-shaped parking lots and landscaped center islands are CDFs of GGV as design features included in the 1958 site plan but does not call out specific plantings or types of plantings found within these islands as character-defining (MHA 2019:5-25, 5-27, 14). The 2019 Study notes that the parking lots have been repaired and repaved as needed, notably under the 1965 Lawn Sprinkler project and the 1983 Site Improvements Plan (MHA 2019:5-26). The parking lot adjacent to B-12 (the parking lot where this undertaking is planned) was altered in 1985 to accommodate the addition of Americans with Disabilities Act (ADA) parking spaces. The parking lots' vegetated islands' sod across the campus were replaced under the 1985 Sod Installation Plan (MHA 2019: 4-5, 4-6, 5-35). MHA added new parking stalls, ramps, crosswalks, and safety speed bumps across the campus in 1993 (MHA 2019:4-5, 4-6). The 2017 Nomination form describes but does not call out the parking lots as character-defining features of GGV (Ruark 2017).

Concrete Sidewalks

The 2019 CDF Study concrete sidewalks' materiality (in essence, the use of concrete materials) and curvilinear design (the alignments) meandering throughout the campus are CDFs of GGV (MHA 2019:5-27, 13). The 2017 Nomination form highlights the extensive system of walkways meandering throughout the campus to create practical connections to the sites different features as part of the contributing site, the Campus Landscape (Ruark 2017).

Views and Vistas

The 2019 CDF Study cites the broad views from the recreation area cluster towards the high-rise cluster as CDFs of GGV under the heading of "Views within Golden Gate Village," and notes that the arrangement of designed features in the property have not changed in a way that alters the historic views and vistas that define the site (MHA 2019:5-40, 21).

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 NHPA, 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.

The Criteria of Adverse Effect and examples of adverse effects were applied to the historic property. The project would trench within areas of the property already altered or not identified as CDFs of GGV and, in the case of CDF vistas and views, occur at ground-level elevation such that it would not diminish the integrity of any CDFs of GGV. Materials like concrete, asphalt, and sod that would be impacted by the project are not CDFs of GGV and would be replaced in-kind (example i). The project would not alter any CDFs of the property (such as the location and spatial relationships of the parking lot areas or their landscaped islands). 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 (example iv). The undertaking would introduce in-ground junction boxes along the conduit's proposed route. These junction boxes would occur at grade in landscaped areas of Parking Lot 1 and adjacent to building B-12. These new features are at grade 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 trenching for conduit at Parking Lot 1 undertaking would not adversely affect the historic property.

REFERENCES

Google Earth

2022 Historical aerial photograph. Available: <https://www.google.com/earth/versions/>. Accessed: October 18, 2022.

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 : ICF
DATE : 1-25-23
PROJECT NAME : Trenching for conduit at parking lot 1

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

- Work site location diagram and/or photo(s)
 - Existing conditions photos
 - Written scope incl. approximate schedule, plans/drawings, work site access details, anticipated equipment needs (i.e. heavy machinery)
 - Other information or documentation associated with the proposed work
- Y / N Is County CDA already aware of MHA's proposed work and ICF's pending recommendation regarding Section 106 review needs?
Yes

SCOPE OF WORK:

Trench for conduit between building B-12 and the existing pole lights at parking lot 1. It would involve crossing 2 sections of sidewalk of approximately 10' and 6' and one section of parking lot of

approximately 18'. Affected sidewalks would be repaired to match adjacent. Junction boxes will be installed as necessary in grass landscaped areas. Trenching would likely be done with a trenching machine. Access to the work areas is clear. We anticipate that work could be complete within 3 working days.



Trenching paths in blue line. Green rectangles represent in ground electrical junction boxes.



This is an example of an in-ground junction

box.





Photos of some of the proposed affected areas.