

FINDING OF EFFECT MEMORANDUM

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

February 7, 2020

I. PROJECT OVERVIEW

Historic Property: Golden Gate Village
Project Name: French Drain Installation
Street Address: 101-429 Drake Avenue & 1-99 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, esmith@marinhousing.org

Project Documents Reviewed:

- Character-Defining Feature Study for Golden Gate Village, 2019
- Draft National Register Nomination for Golden Gate Village, 2017

ICF is conducting a review of a proposed undertaking at the above-referenced address under Section 106 of the National Historic Preservation Act, as amended. The Marin Housing Authority (MHA) is proposing to use federal funds to install a French drain at 49 Cole Drive (high-rise Building 49), within an exterior stairway that is adjacent to unit #15. Acting as the historic preservation consultant for MHA, ICF prepared this Finding of Effect Memorandum as part of its role in supporting MHA in carrying out this Section 106 review of the property.

The subject property, known as Golden Gate Village (GGV), was listed 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 summary, the installation of a permanent, 6-inch French drain to the south end of high-rise Building 49 would constitute *no adverse effect* on the historic property. The proposed scope of work is analyzed in the memorandum.

II. AREA OF POTENTIAL EFFECT

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 proposed scope of work would involve permanent installation of one new French drain at the ground level in the stairway at the southern end of Building 49, adjacent to unit #15 in order to address current flooding of that unit. Once installed nearly all of the drain would be concealed from view and would not be visible from the adjacent sidewalk/approach and driveway. However, parts of the drain would be visible from limited locations adjacent to the south end of Building 49, at the

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east, west, and south facades. Therefore, the APE for this undertaking is defined as the entire Building 49 footprint, and includes associated hardscaping features such as the building’s pentagon terraces, parking terraces, and driveway to its west; the concrete ditch that runs along the building’s east façade; and the additional parking to the south (Figure 1).



Figure 1: An aerial site plan illustration of the APE for the 6-inch French drain installation, shown in red. North is up, Highway 101 is to the east. Courtesy: Google Earth, 2019.

III. DESCRIPTION OF HISTORIC PROPERTY

Golden Gate Village (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

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designers: Architects John Carl Warnecke and Aaron G. Green, and Landscape Architect Lawrence Halprin. Per the NRHP nomination form, the historic district includes 29 contributing buildings and 1 site, a historic landscape designed by Halprin.¹

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 cultural landscape as part of the historic design.

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

The September 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. 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-Defining-Feature Study and is included below. The headers represent the different landscape characteristics that are present within the APE—which are Buildings and Structures, Constructed Water Features, and Small Scale Features—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:

Buildings and Structures

Eight high-rise buildings were called “Bldg. Type A” on the property’s 1958 construction documents. The concrete high-rise buildings were arranged in a cluster that radiates south from Cole Drive and blends into the steep topography at the southern and western edges of the lot. They are rectangular-plan five-story buildings, designed to include approximately 20 two-bedroom units each, as well as storage and laundry rooms.

¹ The National Register nomination for Golden Gate Village is too large of a file to attach to this memo, but it can be viewed online at the SHPO’s website:
http://ohp.parks.ca.gov/pages/1067/files/CA_Marin%20County_Marin%20City%20Public%20Housing_Draft%20Nom.pdf

The units were accessed via outdoor walkways that span the front façades of the buildings, overlooking the driveways and parking terraces. Concrete stairways were located at both the north and south ends of the buildings to provide access to every floor. The stairways at the northern ends of the building were enclosed in concrete walls with punched openings articulating each level of the buildings. They have been somewhat altered over time, while the stairways at the south ends of the buildings remain relatively intact to the historic period. The outdoor walkways were lined with precast concrete guardrails that are characterized by a distinct geometric pattern and attached to pipe handrails. The rear façade of the high-rise buildings contained stacked balconies at every unit over ground-floor terraces.

High-Rise Building Character-Defining Features located in the APE:

- Concrete construction.
- Concrete stairways at both ends of the high-rise buildings.

Constructed Water Features

Built features to control, convey, and drain water were prominent elements of the original 1958 landscape design. The designers incorporated these functional elements into their holistic and aesthetic approach to the site design especially within the high-rise cluster where the topography varied approximately 50 feet.

Interceptor Ditches and Swales

The unlined interceptor ditches are designed to carry more volume of water than the lined ditches. They are located along the sloped area on the south side of the Service Road where water from the Marin Headlands is then conveyed underground below the driveway. Another unlined interceptor ditch is located east of building 69 along the flood zone area. The trapezoidal-shaped ditches have a 12-inch flat base and are 9 inches deep from the finished grade.

Constructed water features from the historic period have generally been retained, although several additional features have been added over time to manage the continuous drainage issues on site. Both flood damage and standard stormwater runoff remain issues for the site. Several additional swales and drainage ditches were added since the historic period including but not limited to the following.

- Swales have been integrated into the center of the driveways and the Service Road. In an attempt to improve drainage, a swale has been cut into the center of the asphalt circulation features. The water is conveyed down the slopes into trench drains at the bottom of the driveways.
- The 1984 Site Improvements Plan called for a concrete lined ditch to follow the south alignment of the Service Road. The ditch is lined with asphalt today rather than concrete. Water from the Service Road is to drain to the center of the road and down the driveways into the trench drains.

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- The 1984 Site Improvements Plan also called for additional concrete ditches to improve drainage along the length of the high-rise buildings. Concrete ditches, aprons, and drainpipes were added to the entire lengths of the buildings opposite of the pentagon terraces.

Constructed Water Features Character-Defining Features located in the APE:

- Interceptor ditch located in sloped area south of Service Road and east of building 69 along the flood zone area.

Small Scale Features

A variety of fences, walls, and other types of small scale features were designed to have both aesthetic and functional qualities at Golden Gate Village. For example, stairways with five or more risers were to receive standard size 0.25-inch galvanized pipe handrails (1.660 inch outside diameter). These are found along stairways built within the topography near the north and south sides of the high-rise buildings.

Additionally, concrete wall elements and retaining walls were built to hold back earth in the steeply sloped landscape throughout the site including the APE, designed in a cohesive system that connected to other circulation and building features in the campus. Some retaining walls were to also serve as seat walls, such as those outlining the pentagon-shaped terraces that are located at intervals along the primary facades of the high-rises facing the driveways. These were designed at a height of approximately 16 inches tall. Other walls included the 5 foot tall wall along the southern edge of the service road and the walls along the east and west ends of the high-rise buildings connecting the staircases to the sidewalks, terraces, and parking lots. All concrete retaining walls on-site were designed with the ends of the walls terminating at grade as a method of blending the features into the existing topography of the high-rise cluster.

Small-Scale Features Character-Defining Features located in the APE:

- Pipe handrails.
- Concrete retaining walls.
- Pentagon-shaped terraces with seat walls.

IV. PROPOSED SCOPE OF WORK

The proposed scope of work for the undertaking consists of constructing one new 6-inch French drain pipe within the concrete floor of the south stairway at Building 49, along a portion of the south facing wall of the building. The new drain would receive and redirect water from the south that is currently flooding unit #15, located at the south end of Building 49.

A site plan is included on the following page to illustrate the layout of the complex and the location of Building 49 (Figure 2).

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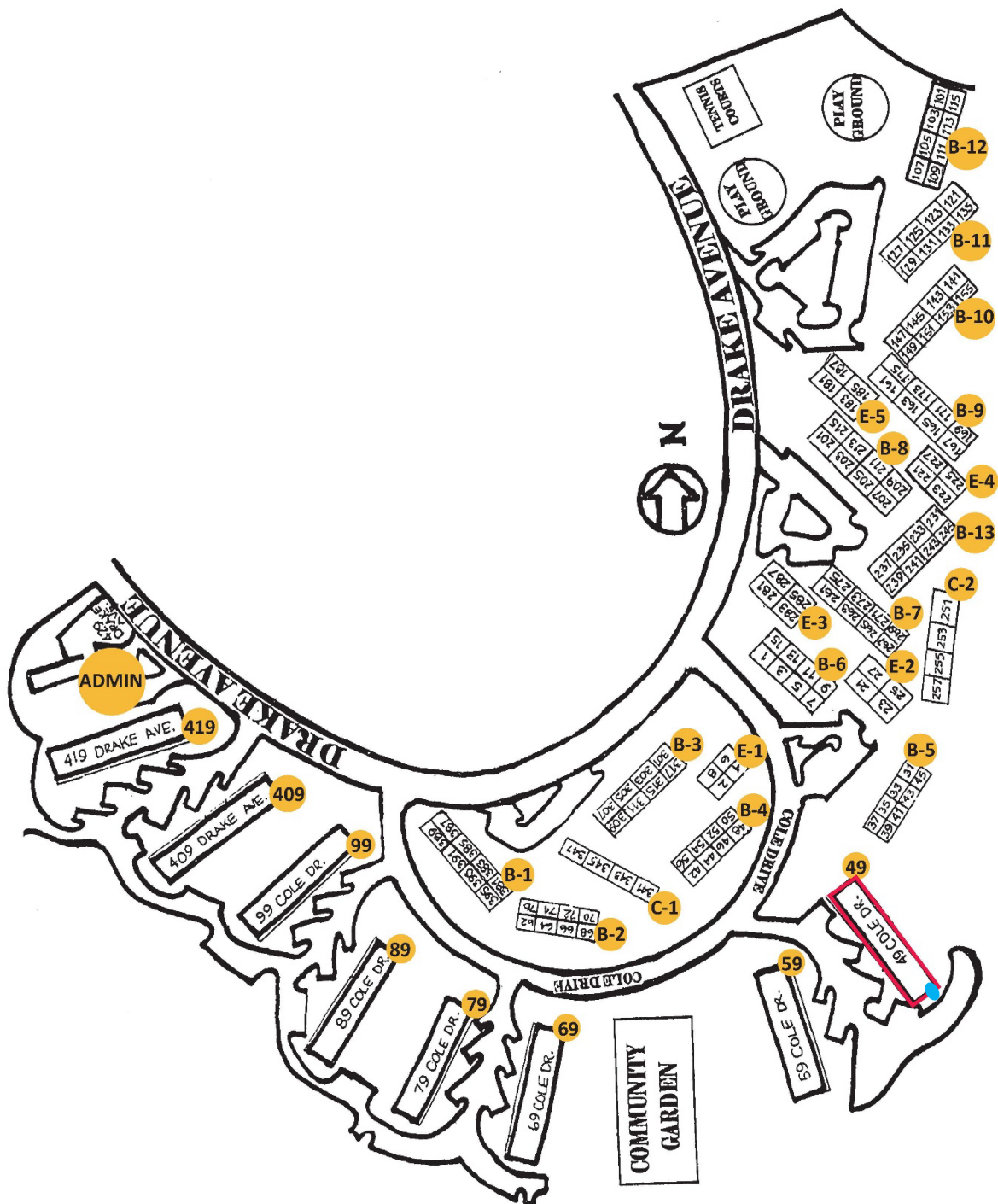


Figure 2: A site plan illustration of Golden Gate Village. Building 49 is outlined in red. The location of the French Drain installation is indicated by the blue dot which is not to scale. North is up, Highway 101 is to the east; map not to scale. Courtesy: Marin Housing Authority, with illustration by ICF.

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The French drain would be inserted into the south end of the primary (west) façade through an existing access point in the concrete that is presently covered by a square metal panel (Figures 3-4). From the access point, the new drain would be inserted under the stairway and would extend up to the ground level landing. It would run west to east, along the building’s south façade within the concrete landing (Figures 5-6). The French drain would empty water through a weep hole in the east wall of the existing stairway into an existing concrete ditch located on the slope at the building’s rear (east) façade (Figure 7). The concrete ditch would carry water from the French drain to the south, running parallel to Building 49’s rear (east) façade. The existing concrete ditch runs below a wood fence that extends past the exterior rear façade of unit #15.



Figure 3: Photograph of the proposed insertion point of the French drain (outlined in red), located at the south end of the primary (west) façade of Building 49, facing east. Courtesy: ICF 2020.

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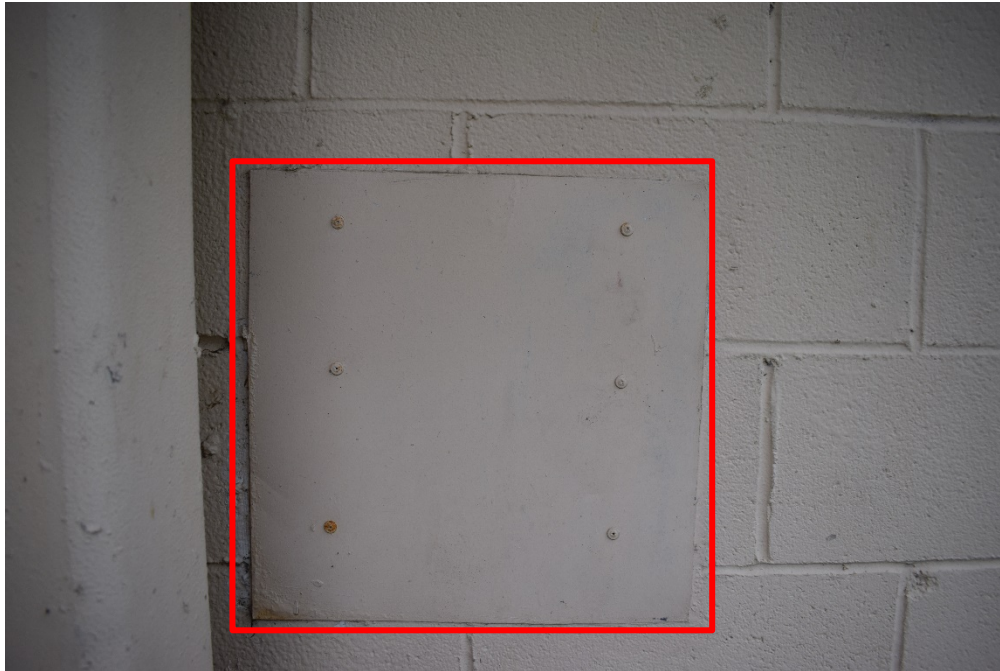


Figure 4: Close-up of the proposed insertion point of the French drain (outlined in red), located at the south end of the primary (west) façade of Building 49, facing east. Courtesy: ICF 2020.



Figure 5: Photograph of the proposed French drain location (outlined in red), which would run under the existing stairway and up to the ground level landing, and continue east along the building's south façade, roughly within the area outlined in red. Courtesy: ICF 2020.

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Figure 6: Photograph of the proposed French drain location (outlined in red), would be located within the ground level landing in the south stairway at Building 49. Courtesy: ICF 2020.

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Figure 7: Photograph of the concrete ditch into which the proposed French drain would empty, and existing wood fence. Courtesy: ICF 2020.

The length of the new drain would be concealed within the concrete floor of the ground level landing but would require a new strip of concrete to be installed over the drain. A change in the color of the concrete where the drain would be installed would be visible from limited locations adjacent to the south end of Building 49, at the east, west, and south facades, until it is weathered.

Additionally, the proposed project would improve existing conditions of Building 49 by stopping current flooding to unit #15, and by alleviating the degradation to the slop behind unit #15 that is currently resulting in soil displacement.

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 assumes that there have been and would be changes within the historic property and provides guidance to allow 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 landscape, ICF reviewed the project documents described previously and conducted a site visit to inspect the project APE on January 16, 2020. This memorandum analyzes the proposed scope of work's compliance to the Secretary's Standards for Rehabilitation.

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.*
- 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.*
- 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.*
- 4. Changes to a property that have acquired historic significance in their own right shall be retained and preserved.*
- 5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.*
- 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.*
- 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.*

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

ANALYSIS OF THE UNDERTAKING UNDER THE SECRETARY’S STANDARDS FOR REHABILITATION

The scope of work, as currently proposed, would comply with the Secretary’s Standards numbers 1, 2, 3, 4, 5, 6, 7, 8, 9, and 10, as discussed below.

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 use to the historic property. The building would continue to be used as residential space. The construction of a French drain would only constitute a minimal change to the materials and features of the high-rise building through the replacement of a small portion of concrete in the south stairway. Additionally, the undertaking is confined to the stairwell and constitutes no change to the distinctive landscape characteristics surrounding the building. Therefore, the undertaking complies 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.*

Comment: The undertaking would allow Building 49 and its surrounding landscape within the extent of the APE to remain unchanged except for the removal of a small strip of concrete within the concrete stairway at the south end of Building 49 and the insertion of a weep hole at its east wall. While both the building’s concrete construction and concrete stairway are character-defining features under the “Buildings and Structures” landscape characteristic, the undertaking would only require a minimally sized new strip of concrete to be replaced and the building and stairwell would retain their historic character. The undertaking would not alter any spaces and spatial relationships of the property. Therefore, the undertaking complies 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 addition of a French drain would not create a false sense of historical development. At the stairway, the new drain would be an imperceptible change; its installation would be covered with concrete to match the extant material historically used in the construction and design of the stairway. The visible portion of the drain would be

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compatible in design, made of modern materials, and would read clearly as a contemporary intervention. There are no conjectural elements proposed for the undertaking; therefore, the undertaking complies 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 would result in minimal physical alterations to features that were constructed during the period of significance, including the concrete stairway at the south end of Building 49. It would drain into a ditch at the rear of Building 49, which was a later alteration that does not contribute to the historic property. Therefore, the undertaking would not result in any changes to features within the property that have acquired significance in their own right. The undertaking complies 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 would constitute a minimal change to the materials and finishes of high-rise Building 49. The addition of a 6-inch French drain would require in-kind replacement of part of the concrete construction of the south concrete stairway floor of Building 49 and insertion of a weep hole at the east wall of stairway. While the building's concrete stairway is character-defining under the "Buildings and Structures" landscape characteristic, the undertaking would remove only a small portion of concrete within the larger feature. Furthermore, the undertaking would cover the new drain with concrete which would match the color, texture, and finish as the adjacent historic concrete, which is consistent with historic construction techniques and finishes. Therefore, the undertaking complies 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 proposed undertaking requires the replacement of part of the building's concrete materials at the south stairway. The new concrete would match the original in-kind. It would be located at the less-visible south end of the building and would utilize an existing access point into the building façade, which would not create a new disruption in the concrete. Additionally, the French drain would be inserted into the south end of the primary (west) façade through an existing access point in the concrete that is presently covered by a square metal panel. Overall, the undertaking does not disrupt or remove the historic character-defining features of the high-rise building or any of the adjacent landscape features. Therefore, the undertaking complies 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: There are no plans for chemical or physical treatments to be undertaken on historic materials as part of the proposed undertaking. Therefore, Standard 7 does not apply.

8. Archeological resources will be protected and preserved in place. If such resources must be

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disturbed, mitigation measures will be undertaken.

Comment: The proposed scope of work would not include ground disturbance and no archeological resources would be disturbed as a result of the proposed undertaking. Therefore, Standard 8 does not apply.

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 introduce a new 6-inch French drain within the ground level concrete landing at the south stairway of Building 49 and along the west façade building wall. Within the APE, character-defining features altered by the undertaking are limited to a small area of concrete materials of a concrete stairway at one of the high-rise buildings.

Although the proposed undertaking would require removal and replacement of a small strip of concrete in the south stairway and addition of a weep hole at the east wall of the stairway, the new drain would not diminish the property’s character-defining features overall as the amount of overall original concrete being removed would be minimal. The drain would not be visible because the inserted drain would be covered with in-kind concrete to conceal it within the landing, making it compatible with the historic property.

Because the new drain would be installed in the high-rise building only, it would not diminish or remove any character-defining features of the adjacent natural systems and features, spatial organization, circulation, vegetation, constructed water features, and small-scale features. Therefore, the undertaking complies 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 proposed scope of work notes the French drain would require the removal of a small strip of concrete in the south stairway of Building 49. In the unlikely event that the drain was to be removed in the future, the area of work could easily be patched with in-kind concrete to match the adjacent historic materials and the overall form and features of the high-rise building and landscape would be retained. Therefore, the undertaking complies with Standard 10.

Summary of Analysis

In summary, the proposed scope of work respects the historic character of the historic property. The French drain would be concealed from exterior vantage points, and in-kind materials would be used to cover the drain. As such, the undertaking complies with the Secretary of the Interior’s Standards.

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IV. FINDING OF EFFECT

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

V. REFERENCES

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.