

MEMORANDUM

DATE October 8, 2025

PROJECT NO. 22349

TO Briana Cox, Associate Principal

PROJECT Watsonville City Plaza Revitalization
Project

OF SAA Landscape Architects

FROM Maggie Nicholson, Cultural
Resources Planner, Page & TurnbullREGARDING Watsonville City Plaza – Secretary of the Interior’s Standards Compliance Analysis
(100% CD Submittal)

INTRODUCTION

The City of Watsonville has requested this *Secretary of the Interior’s Standards for Rehabilitation* (SOI Standards) Compliance Analysis for SAA Landscape Architect’s 100% construction documents (dated July 25, 2025) developed for the proposed revitalization project at City Plaza, located at 358 Main Street (APN 017-11-201). Prior documentation and analysis of this project can be found in the following reports:

- Rincon Consultants’ October 2019 “Watsonville City Plaza Expansion and Revitalization Project: Initial Study – Mitigated Negative Declaration” (IS-MND)
- Page & Turnbull’s June 2023 “Character-Defining Features Memorandum”
- Page & Turnbull’s June 2023 “Historic American Landscape Survey”
- Page & Turnbull’s July 2023 “SOI Standards Compliance Analysis Memorandum,” review based on 30% design drawings dated July 7, 2023
- Page & Turnbull’s December 2024 “SOI Standards Compliance Analysis Memorandum,” review based on 95% design drawings dated November 22, 2024.

The purpose of this Compliance Analysis memorandum is to ensure that the 100% construction drawings for the project continue to comply with the *Standards for Rehabilitation*. A discussion of *Standards for Rehabilitation* compliance is included.

100% COMPLETE DESIGN DESCRIPTION

While the overarching project description remains unchanged, the following section outlines new and/or revised specifications since delivery of the 95% design drawing set, dated November 22, 2024. This description utilizes the “Watsonville City Plaza Revitalization Project” 100% drawing set prepared by SSA Landscape Architects, dated July 25, 2025. Orthogonal directions used for this description follow plan north as shown in the drawing set.

Imagining change in historic environments through
design, research, and technology

Bandstand

- Repair exploratory openings in concrete knee-wall at stairs.
- Patch anchorage holes from removed guardrails in existing stone coping at bandstand's top edge, typically three locations within each sector.
- All stone masonry joints will be repointed with lime-based mortar to match historic color and joint profile.
- 109 specific points of repair have been identified across all sections of the exterior sandstone cladding, with the repair scope of each including cleaning, patching, repointing, and/or treating corrosion.
 - While these general repair processes are not new to the project scope, the specific areas of work are clarified in this 100% drawing set to ensure accurate implementation and protection of historic materials.
- The treatment plan for existing metal elements has been specified to include cleaning and treating with biocide, removing loose and flaky paint, treating corrosion, and priming and repainting.
- The new stair railing will be comprised of three-inch square termination posts, three-quarter-inch square balusters, two-inch square intermediate posts, two-inch-diameter top rail, and one-and-a-half inch diameter round handrail and bottom rail.
 - New security grille access door, sunburst-style security grilles, and guardrail will be of similar material.
 - The new vertical security panel, mounted perpendicularly on the south side of the door frame, will feature scrolls, similar to the existing hopper window grilles.
- Glazing in all four hopper windows will be replaced with new tempered glass to match the historic thickness, with security film also applied. Window rehabilitation has been revised to specify routine maintenance, stabilization, and/or component replacement at each window.
- Paint selections confirmed as "Eider White" for roofing and associated structural elements, decorative brackets, and interior below the graywacke sandstone coping; "Deep Forest Brown" for railings and grilles; and "Kilkenny" for the wood elements of the hopper windows.
- A radiused tooled control joint will be placed in the new concrete slab of the floor where it intersects with the top stair landing (near the security door threshold).
- New surface-mounted light fixtures will be installed in the basement.
- Basement stair stringers will be fabricated from steel and bent to match the curve of the existing concrete steps over which they will be installed. The new steel stairs and all associated fasteners and metal accessories will be hot dip galvanized with all joints to be ground/sanded before galvanizing. The stairs will be flanked on both sides by three-tier railing.
- New basement stair guardrail will be supported by one-and-a-half inch square posts with a top square rail, middle pipe handrail, and lower pipe rail.

Fountain

There does not appear to be any new and/or revised specifications to the fountain scope of work.

Other Site Features

- Elevated stage (30 inches) in southwest quadrant will include two runs of stairs at either side, each flanked by a pair of metal railings, and a rear ADA-ramp flanked by a pair of metal railings. Metal railings will also span the outermost edges of the stage.
- Path material at east corner changed to permeable brick pavers (Type 01 and 02), which runs through an unpaved semicircular planting area encircled by a strip of pervious concrete. The paver path will be lined with a soldier course brick band. This circulation reconfiguration and exchange of materials accommodates the replacement of sections of city sidewalk, curb, and gutters.
 - A “historical art element” will be installed on an expanded portion of the pervious concrete strip (creating a display pad), at the south end of this area nearest the Peck Street sidewalk. This appears to require electrical/lighting coordination.
- The south corner of the plaza will also receive a “historical art element,” at the northeast edge of the semicircular strip of pervious concrete nearest the Peck Street sidewalk. This appears to require electrical/lighting coordination.
- A drinking fountain will be installed in the southeast quadrant near the center of the north-south path as well as in the northeast quadrant along the bandstand’s outermost ring of stabilized decomposed granite paving nearest the rear elevation of the restroom building.
- A “historical art element” will be installed in an oval-shaped bed of stabilized decomposed granite paving ringed in a soldier course brick band north of the diagonal path from the intersection of Main and East Beach streets as well as west of the diagonal path from the intersection of East Beach and Union streets. Both locations appear to require electrical/lighting coordination.
- The existing memorial boulder with plaque will be reinstalled in the northwest quadrant at the corner of the north-south path and the bandstand’s outermost ring of stabilized decomposed granite paving.
- Several black metal benches and picnic table units have been removed and/or relocated in the drawings, though the overall number does not appear to be significantly different.
- The planting plan notes the installation of new trees, including cedar, ginkgo biloba, crape myrtle, and palm, at the north, south, and west corners of the park, highlighting the access points from the perimeter sidewalk.
 - A new cedar will be planted in the existing raised bed in the southwest quadrant, if it is salvageable following the removal of the existing tree it contains.
- All path intersections (both primary and secondary) with the perimeter sidewalk, with the exception of the east corner, will be ringed with shrubs, including cape reed.

DISCUSSION OF SOI STANDARDS FOR REHABILITATION COMPLIANCE

Page & Turnbull reviewed the overall project scope and SSA Landscape Architect's 100% construction drawings, dated July 25, 2025, to determine if the project design continues to adhere to the *Secretary of the Interior's Standards for Rehabilitation*.¹ The following table includes an updated discussion of the proposed project's SOI Standards compliance from conceptual design.

Conceptual Design Discussion from IS-MND ²	30% Technical Specification Drawing Discussion	95% Technical Specification Drawing Discussion	100% Construction Drawing Discussion	Meets SOIS?
<i>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</i>				
The proposed project would continue the historic use of the Watsonville City Plaza as a community gathering space and public square. The addition of new features and elements such as the stage, group picnic areas, game tables, historic/art element pedestal, and restroom building would expand its function, but would not alter its overall historic use as a public town plaza and gathering locale. Therefore, the proposed project will be used for its historic purpose and complies with Standard 1.	The proposed project continues City Plaza's historic use as a public greenspace and gathering space. New features and elements do not appear to impact the plaza's historic and continued use, but rather reinforce it. Therefore, the proposed project remains consistent with Standard 1.	The proposed project continues City Plaza's historic use as a public greenspace and gathering space. The plaza's distinctive features, including the historic canopied bandstand, fountain, and cannons, are being rehabilitated; its historic spatial relationships are retained. Therefore, the proposed project remains consistent with Standard 1.	The proposed project continues City Plaza's historic use as a public greenspace and gathering place. Rehabilitation of the historic bandstand and fountain and retention of the other historic features (cannons and drinking fountain) supports rather than alters its longstanding function. Therefore, the proposed project remains consistent with Standard 1.	Yes
<i>Rehabilitation 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.</i>				
The proposed project will retain and preserve the historic character of the Watsonville City Plaza. The historic character of the plaza is defined through its character-defining features, which as a historic designed landscape tie to its spatial organization, topography, vegetation, circulation, water features, buildings and structures, and site furnishings and objects. The project would not directly alter the significant spatial organization and topography, which will continue to exhibit its radial pattern with diagonal walkways and flat topography. Although the project will introduce new materials and features within portions of the defined quadrants, the spatial configuration and circulation of the plaza will remain intact and new materials will be compatible with the historic character. Further, while asphalt will be removed, this material is non-original and is not considered character defining. The circulation pattern will be slightly modified through the reconfiguration of the entry point at the intersection of Peck and Union streets; however, this is being proposed to avoid damage to the root system of the historic tree at this location. Some vegetation is also proposed to be removed; however, with the exception of some trees, which date to the plaza's period of significance (1906), the specific plantings have been continually replaced and modified and do not date to the historic period. While conceptual at this	The proposed project retains the historic configuration, circulation, historic structures and elements, and majority landscaping of City Plaza. From the public right-of-way, the site will largely retain its historic character with the exception of the newly installed prefabricated bathroom facility on the Union Street side (installed 2020). Rehabilitation of the historic raised sandstone bandstand with canopy and the historic fountain are planned, based on a condition assessment performed in April 2023 by Page & Turnbull and to align with the Secretary of the Interior's <i>Standards for Rehabilitation</i> . The scope of rehabilitation for the bandstand generally includes cleaning, repair of damaged masonry (including grotesque keystones and window surrounds), mortar repair, repainting the canopy, structural corrections, and improvements to the electrical system. The scope of rehabilitation for the fountain generally includes cleaning, corrosion treatment, repainting, repair of tiled basin interior, and plumbing and electrical upgrades. Therefore, the proposed project remains consistent with Standard 2.	The proposed project retains and preserves City Plaza's historic character. The rehabilitation of the historic bandstand includes meticulous repairs to restore its aesthetic integrity as well as structural enhancements. The sandstone exterior will be repaired with salvaged and cataloged original materials, with damaged stones replaced by concrete castings to match the original design, while mortar and decorative keystones are restored. Roofing repairs include patching sheet-metal, replacement canopy posts, and refinished ornamental brackets, complemented by fresh finishes for all metal components. The wood-framed hopper windows and lampposts will also be rehabilitated. New metal handrails, guardrails, and security grilles will be installed for improved safety. Structural updates include reinforced basement walls and a new upper floor slab with drainage. The rehabilitation of the historic fountain involves cleaning and refinishing the cast iron elements, repairing the basin and its finishes, and selective masonry repairs to the basin's slumpstone cladding. Additional updates include replacing underwater light fixtures and repairing/replacing the pump, piping, and drainage systems to ensure full functionality. The historic drinking fountain and flagpole will be protected in place, while the two historic cannons are relocated to replacement plinths flanking the flagpole. Ultimately, the proposed project does not remove distinctive materials, and the scope of work does not alter the primary spaces and spatial relationships that characterize the plaza. Therefore, the proposed project remains consistent with Standard 2.	The proposed project preserves City Plaza's historic character, spatial organization, and character-defining features. Rehabilitation of the bandstand and fountain follows best practices, and new elements (primarily paving and plantings) are compatible with the historic setting without removing distinctive materials. Therefore, the proposed project remains consistent with Standard 2.	Yes

¹ Anne E. Grimmer, *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings*, (U.S. Department of the Interior National Park Service Technical Preservation Services, Washington, D.C.: 2017), accessed July 13, 2023, <https://www.nps.gov/tps/standards/treatment-guidelines-2017.pdf>.

² Rincon Consultants, Inc., "Watsonville City Plaza: Cultural Resources Technical Report," October 2019.

Conceptual Design Discussion from IS-MND ²	30% Technical Specification Drawing Discussion	95% Technical Specification Drawing Discussion	100% Construction Drawing Discussion	Meets SOIS?
time, it is anticipated the proposed plantings will be consistent in height, scale, and typology, and will continue to define the historic organization of the plaza. With respect to water features and buildings and structures, the proposed project would rehabilitate the fountain and historic bandstand. Through mitigation adopted as part of the project these activities will be carried out by qualified individuals in a manner consistent with the Standards. The cannons are proposed to be relocated within the plaza near the existing water fountain along Main Street. However, historic aerial photographs indicate the cannons have been previously relocated within the plaza and their significance is not tied to their current location. Therefore, the project complies with Standard 2.				
<i>Rehabilitation 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.</i>				
The proposed project will introduce new features within the quadrants of the plaza. These are not anticipated to result in a false sense of historical development. Through mitigation adopted as part of the project, the landscaping, features, and materials will be differentiated yet compatible with the historic materials, size, and scale of the property and its setting. As a result, the project complies with Standard 3.	No conjectural features, elements, or materials are planned for installation in the proposed project. Interpretive signs outlining the history of City Plaza and its historic elements are planned to be installed at various locations. Therefore, the proposed project remains consistent with Standard 3.	The proposed project does not put forth changes that create a false sense of historical development for Watsonville's City Plaza. Extant historic elements, such as the bandstand and fountain, will be rehabilitated per the Secretary of the Interior's <i>Standards for Rehabilitation</i> . Other historic elements, such as the drinking fountain and cannons, will be preserved in place. The location of three interpretive signs with text and images outlining the history of City Plaza and its historic elements is confirmed. While modern metal tables and benches as well as a elevated concrete stage will be installed, these elements are clearly not conjectural features or elements from other historic properties. Therefore, the proposed project remains consistent with Standard 3.	No conjectural features are introduced. New additions, such as benches, tables, interpretive signage, and the stage are clearly contemporary and differentiated, avoiding a false sense of history. Therefore, the proposed project remains consistent with Standard 3.	Yes
<i>Rehabilitation Standard 4: Changes to a property that have acquired historic significance in their own right will be retained and preserved.</i>				
The period of significance is defined in the National Register nomination for the Watsonville City Plaza as 1906. The cannon was added to the plaza in 1924 and specifically identified in the National Register nomination, suggesting it is a feature which is contributing and has gained significance in its own right. This feature is proposed to be retained as part of the proposed project. The project, therefore, complies with Standard 4.	The National Register nomination form states City Plaza's period of significance as 1906. However, the land has been used as a public green since 1860 and elements have been added and altered within the site since that time. Several elements that have gained significance in their own right include the bandstand canopy (1965), two cannons (installed 1924), and several cast-iron lampposts with single globe lamps (installed circa 1919). The feasibility of rehabilitating the lampposts or replacing them is still being reviewed. Therefore, at the 30% design stage, the proposed project remains consistent with Standard 4.	Since the 30% design stage, it has been decided that the approximately six (6) freestanding cast-iron lampposts will be removed. Like-kind replacements (in different locations) are planned for installation. The short concrete retaining wall in the southwest quadrant of the plaza, constructed in the 1920s or 1930s, will be preserved, if possible. The White Alder tree it surrounds will be removed, so the wall is at risk for damage. The bandstand canopy (1965) will be rehabilitated and the two historic cannons will be preserved in place. Therefore, the proposed project remains consistent with Standard 4.	Features that have gained significance in their own right, such as the bandstand canopy and the two cannons, will be preserved and/or rehabilitated. The canopy requires replacement supports to meet current structural requirements, which will be similar in style to those existing. The cannons will be installed in new locations, though remaining in the general vicinity of the southwest side of the plaza near Main Street. Therefore, the proposed project remains consistent with Standard 4.	Yes

Conceptual Design Discussion from IS-MND ²	30% Technical Specification Drawing Discussion	95% Technical Specification Drawing Discussion	100% Construction Drawing Discussion	Meets SOIS?
<i>Rehabilitation Standard 5: Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.</i>				
The proposed project will retain the distinctive features, finishes, and construction techniques and examples of craftsmanship that characterize the Watsonville City Plaza. Character-defining features such as the spatial arrangement, topography, and circulation will be preserved in place, and vegetation will be consistent with historic landscaping and strategically located to define the plaza's spatial arrangement. Construction techniques and craftsmanship are primarily limited to the bandstand and the fountains, which will be kept in place and rehabilitated as needed in a manner consistent with the Standards due to project-specific mitigation measures. As a result, the project complies with Standard 5.	The proposed project rehabilitates the three primary historic elements (the bandstand with canopy, the fountain, and the drinking fountain) and retains the essential elements that give City Plaza its sense of place. While new materials will be installed, such as permeable brick pavers, benches and picnic tables, and an elevated stage, all currently appear to be of like-kind materials that complement the historic elements and composition of the site. No major changes to the spatial arrangement, topography, and circulation are proposed. Therefore, the proposed project remains consistent with Standard 5.	The rehabilitation scope of the proposed project has been refined such that the historic drinking fountain will be preserved in place. Additionally, the details of the canopied bandstand and fountain rehabilitations are confirmed, and this work aims to preserve the distinctive materials, finishes, and construction techniques of these historic features. There are no major changes to the plaza's spatial arrangement, topography, or circulation. Therefore, the proposed project remains consistent with Standard 5.	Distinctive materials and craftsmanship, particularly in the sandstone bandstand with canopy, fountain, and historic site elements (cannons and drinking fountain) will be preserved in the proposed project. The additional outlined rehabilitation techniques for the bandstand follow best practices and maintain historic materials to the greatest extent possible with necessary replacement materials being like-kind. Therefore, the proposed project remains consistent with Standard 5.	Yes
<i>Rehabilitation 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.</i>				
None of the historic features of the Watsonville City Plaza are proposed to be replaced. The asphalt which is proposed to be repaved or replaced with pavers is not original or considered historic, nor are the specific plantings which are proposed to be removed and replaced with new vegetation. The historic fountain and bandstand will be rehabilitated in accordance with the Standards per project-specific mitigation measures. The project therefore complies with Standard 6.	All significant historic features of the site are retained in the proposed project. Generally, materials that are planned for replacement are not historic nor date to the 1906 period of significance. Of the four historic trees identified in the 2019 IS-MND report, a mature White Alder contained within a short retaining wall near the southwest corner of the site is slated for removal (along with the concrete and brick wall surrounding its base). City staff have indicated the average lifespan of this type of tree as 75 years and severe pruning has resulted in declining health of the tree. For public safety reasons, the historic tree is being removed. While it is not necessarily a distinctive feature, it will be replaced with another tree. Therefore, the proposed project remains consistent with Standard 6.	The proposed project incorporates a detailed rehabilitation plan for those deteriorated historic features, including the canopied bandstand and fountain. Both features will require replacement components, which will match the old in design, color, texture, and material. The one exception is the materiality of the bandstand's stair coping. The extensive spalling along the existing stone coping coupled with this feature's requirement to support new metal handrails and guardrails requires replacement with new cast concrete. However, the cast concrete will match the existing color, texture, joints, and appearance of the extant stone coping. Other historic features, such as the cannons and drinking fountain, will be preserved in place. Other materials to be replaced, such as benches and tables, are not historic. The removal of the historic White Alder tree in the plaza's southwest quadrant is confirmed and will be replaced (likely with a smaller tree variety). Every effort will be made to protect the short retaining wall surrounding its base, though it is at risk for damage with the removal of the tree it contains. If damage is incurred, the replacement wall will match the old in design, color, texture, and material. Additionally, a Historic American Landscape Survey (HALS) of Watsonville City Plaza was authored by Page & Turnbull, dated June 2023. Therefore, the proposed project remains consistent with Standard 6.	The proposed project continues to prioritize repair over replacement. Where replacement is necessary (e.g., coping stones, stair elements at the bandstand), new materials match the historic in design, color, texture, and appearance. Prior evaluation, conditions assessment, and documentation supports all instances of like-kind replacement. Therefore, the proposed project remains consistent with Standard 6.	Yes
<i>Rehabilitation Standard 7: Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.</i>				
Any rehabilitation work to the historic fountain and bandstand will be completed by qualified individuals in accordance with the Standards per project-specific mitigation measures. The project complies with Standard 7.	Page & Turnbull is a qualified subconsultant to SSA Landscape Architects hired to perform a conditions assessment and Basis of Design report for the historic bandstand and fountain. All Page & Turnbull professional staff members meet or exceed the	Page & Turnbull performed a conditions assessment on the canopied bandstand and fountain in April 2023. Materials testing and exploratory work was carried out between February and June 2024. These preliminary investigations provided insight into the best methods for rehabilitation of both historic features, using the gentlest means	The proposed project continues to implement treatments that use the gentlest means possible, following specifications developed from materials assessment and testing. Cleaning,	Yes

Conceptual Design Discussion from IS-MND ²	30% Technical Specification Drawing Discussion	95% Technical Specification Drawing Discussion	100% Construction Drawing Discussion	Meets SOIS?
	SOI's Professional Qualifications Standards as published in the Code of Federal Regulations, 36 CFR Part 61. Rehabilitation of the bandstand and fountain includes cleaning to address heavy soiling, rust, bio-growth, and/or graffiti. Specific chemicals and/or treatments have yet to be determined. A biocide is specifically planned for treatment of the bandstand's metal canopy. Therefore, the proposed project remains consistent with Standard 7.	possible. Page & Turnbull developed standard specification documents to guide the cleaning and treatment of historic masonry, cast iron and decorative metal, wood windows, cement plaster, and ceramic tiling as well as guidance on historic treatment procedures, the maintenance of cast-in-place concrete, exterior painting, and high-performance coatings. These documents were delivered to the project team in December 2024. Therefore, the proposed project remains consistent with Standard 7.	corrosion treatment, repainting, and mortar repair processes are all designed to avoid damage to historic fabric. Therefore, the proposed project remains consistent with Standard 7.	
<i>Rehabilitation Standard 8: Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.</i>				
Background research completed in support of this project determined that it is unlikely that intact subsurface archaeological deposits exist within the project site at any depth. No significant impacts to archaeological resources are expected to result from the proposed project and Standard 8 does not apply.	While archeological resources are not anticipated to be uncovered during the proposed project, onsite staff should be aware that this is a possibility given the age of the site. If such resources are uncovered, a mitigation plan should be set in motion to notify a local archeologist, museum, etc. While such a plan is not yet in place, the project team is familiar with mitigation measures. Therefore, the proposed project remains consistent with Standard 8.	The proposed project remains committed to avoiding the disturbance of archeological resources. Therefore, the proposed project remains consistent with Standard 8.	Archaeological resources are not anticipated to be discovered during the course of the proposed project. Therefore, the proposed project remains consistent with Standard 8.	Yes
<i>Rehabilitation Standard 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.</i>				
Although the project will introduce new features to the Watsonville City Plaza, they will not destroy historic materials that characterize the project and will be compatible with the historic character of the plaza. Many of the physical materials in the plaza, such as the asphalt, vegetation, and landscaping, do not date from the period of significance. Rather, it is the spatial arrangement, circulation patterns, and location of plantings and vegetation, which work to define the overall character of the plaza. These critical elements will be retained as part of the proposed project, with the plaza's radial pattern, diagonal walkways, and use of vegetation and landscaping to define these spaces kept in place as part of the project. Although the pathway at the intersection of Union and Peck streets will be reconfigured slightly, this will permit the historic-era tree in this location to remain in place. Additionally, the specific historic materials of the bandstand and fountains will be kept in place and rehabilitated in a manner consistent with the Standards. New additions to the plaza, including the partial infill of the quadrants and circular pathway enclosing them will be completed in a manner that is differentiated but compatible with the plaza's character-defining features. These new areas will be constructed	The proposed project does not intend to destroy historic features or spatial relationships. Various materials, predominately hardscape areas, site furnishings, and vegetation, will be replaced but are similar enough to retain the overall historic context of the site. While the new stage will occupy an area currently comprised of non-historic asphalt, a planting bed, and some turf, it is a minimal impact and will not affect topography or spatial relationships. The bathroom facility was installed in 2020 and is clearly differentiated from the historic structures on the site. It is a prefabricated building ornamented with graffiti-style artwork illustrative of the local culture of Watsonville. Therefore, the proposed project remains consistent with Standard 9.	The proposed project remains committed to the rehabilitation of the historic canopied bandstand and fountain. New handrails and guardrails will be installed on the bandstand, which will clearly be contemporary additions yet compatible in terms of material, size, scale, and proportion. No alterations are planned for either feature. Other new additions to City Plaza are small-scale features that primarily replace non-historic existing elements, such as benches and tables. This scope of work will not impact the historic materials, features, or spatial relationships that characterize the National Register-listed property. A 30-inch elevated stage of cast-in-place concrete will be constructed in the southwestern quadrant of the plaza; this new construction will not destroy historic materials, features, or spatial relationships. More broadly, replacement hardscaping and vegetation will be compatible such that the plaza's integrity is retained. Therefore, the proposed project remains consistent with Standard 9.	New features, including the stage, pathway materials, site furnishings, and four historical art elements, are compatible in material, scale, and design while remaining clearly contemporary. Their installation does not destroy historic materials, features, or spatial relationships within the proposed project area, but rather reinforces City Plaza's role as a civic landmark. Therefore, the proposed project remains consistent with Standard 9.	Yes

Conceptual Design Discussion from IS-MND ²	30% Technical Specification Drawing Discussion	95% Technical Specification Drawing Discussion	100% Construction Drawing Discussion	Meets SOIS?
completely within the existing quadrants and will not affect the historic site design of the plaza. The western-most quadrant will be designed to include a stage; however, a portion of this stage will be removable and utilized only during specific events at the plaza. This will enable the inner circular plaza to remain clearly defined and distinct from the outer quadrant. The game table and picnic areas will feature decomposed granite and concrete pavers which will be compatible with the natural vegetation and paved walkways, yet unique as to not recreate or falsely replicate original elements. While conceptual at this time, it is anticipated that the gaming and picnic tables, as well as the new restroom building will be of compatible materials and design as to be consistent with the historic character of the Plaza. Similarly, the new circular pathway will be constructed using unique materials as to not be confused with the historic pathways and circulation pattern. Similarly, the plaza is proposed to be expanded through the resurfacing of Peck and Union Street through permeable pavers; however, this work will be completed within the right-of-way with compatible-but-differentiate materials and will be clearly divided from the historic boundaries of the plaza. New vegetation and landscaping is also proposed as part of the project. This landscaping will be utilized in a manner that is consistent with the historic character of the Watsonville City Plaza. It will be placed in specific locations to help define spaces and create curated viewsheds within the plaza. It will feature similar plantings to those which have historically characterized the Plaza. The project therefore complies with Rehabilitation Standard 9.				
<i>Rehabilitation 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.</i>				
The new features that are proposed by the project will be completed in such a manner that, if removed, would not impair the essential form and integrity of the historic property or its environment. The stage, game tables, picnic areas, and other project elements could be removed at a future date with no permanent effect on the resource. Therefore, the project complies with Rehabilitation Standard 10.	The proposed project predominantly involves exchanging materials and constructing a low stage. The "30% Technical Specification" drawings dated July 7, 2023 do not appear to impact the essential form and integrity of the historic site nor any of the historic elements contained therein. Therefore, the proposed project remains consistent with Standard 10.	The proposed project does not impair the essential form or integrity of the historic plaza and its environment. The majority of new additions are small-scale features, such as tables and benches, that could be removed at a future date with no lasting impression on the plaza landscape. Therefore, the proposed project remains consistent with Standard 10.	Additions such as the stage, furnishings, interpretive signage, and four historical art elements are designed to be reversible and could be removed without impairing the plaza's overall form, character, or integrity. These features will be integrated in a manner that protects the historic design of City Plaza. Therefore, the proposed project remains consistent with Standard 10.	Yes

FINDING

Review of the 100% construction documents for the Watsonville City Plaza Revitalization Project, dated July 25, 2025, confirms that the proposed design remains consistent with the *Secretary of the Interior's Standards for Rehabilitation*. All character-defining features, including the historic bandstand, fountain, drinking fountain, and cannons, will be preserved and rehabilitated in accordance with the Standards, while new site features such as furnishings, stage, interpretive signage, and historical art elements are compatible, differentiated, and reversible. As with earlier design phases, the project does not remove or obscure historic materials, features, or spatial relationships and continues City Plaza's historic function as a public greenspace and gathering space.

Page & Turnbull finds that the proposed project continues to comply with all ten SOI Standards. Therefore, the proposed project does not appear to cause a significant impact to an identified historic resource according to the California Environmental Quality Act (CEQA).

QUALIFICATIONS

Page & Turnbull was established in 1973 as Charles Hall Page & Associates to provide architectural and conservation services for historic buildings, resources, and civic areas. The company was one of the first architecture firms in California to dedicate its practice to historic preservation and is among the longest practicing such firms in the country. Offices are located in San Francisco, Los Angeles, Sacramento, and San José, and staff includes planners, architectural historians, licensed architects, designers, and conservators. All of Page & Turnbull's professional staff members meet or exceed the Secretary of the Interior's Professional Qualifications Standards as published in the Code of Federal Regulations, 36 CFR Part 61.

As a cultural resources planner within Page & Turnbull's Cultural Resources Studio, Maggie Nicholson meets the Secretary of the Interior's Professional Qualifications Standards for Architectural History. She has extensive experience researching and evaluating historic properties, as well as analyzing proposed projects that impact historic resources using the *Secretary of the Interior's Standards for Rehabilitation*. This memorandum was reviewed by Christina Dikas Brobst, Principal and Senior Architectural Historian. The project is overseen by Peter Birkholz, principal-in-charge.