

**SECRETARY OF THE INTERIOR'S STANDARDS REVIEW**

**PROPOSED RISPIN MANSION PARK  
LANDSCAPE REHABILITATION PROJECT**

**at the**

**HISTORIC RISPIN MANSION**

2000 Wharf Road at Clares Street  
(Parcel Numbers 35-011-07, 035-031-32 and 37, and 035-042-30)  
Capitola, Santa Cruz County  
California

For:

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Prepared by:

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## INTRODUCTION

### Summary

The currently proposed landscape rehabilitation, reuse, and community park project for the historic Rispin Mansion meets the *Secretary of the Interior's Standards for the Treatment of Historic Properties – Rehabilitation Standards* (Standards). The project design is compatible with the historic resource, and the proposed alterations will not permanently impact the historic Rispin Mansion. It is the professional opinion of Archives & Architecture that the City of Capitola can make a determination that the project will not have an adverse effect on an historic resource per the California Environmental Quality Act (CEQA).

### Report Intent

Archives & Architecture, LLC (A&A), was retained by Michael Arnone to prepare a Secretary of the Interior's Standards Review of the community park and landscape rehabilitation project proposed for the grounds of an historic former residence known as the Rispin Mansion, at 2000 Wharf Road, Capitola, California. Archives & Architecture was asked to review the site plan, master plan, landscape plans, materials, elevations, details, and site furniture of the proposed rehabilitation project. For the review, the project was evaluated for compliance with the *Secretary of the Interior's Standards for Rehabilitation* (Standards). The Standards are understood to be a common set of guidelines for the review of historic buildings and are used by many communities during the environmental review process to determine the potential impact of a project on an identified resource.

The specific relevance of Standards review for this project is in reference to the California Environmental Quality Act (CEQA). According to the California Office of Historic Preservation (<http://www.ohp.parks.ca.gov/pages/1054/files/ts01ca.pdf>), “a project that has been determined to conform with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* can generally be considered to be a project that will not cause a significant impact (14 CCR § 15126.4(b)(1)). In fact, in most cases if a project meets the Secretary of Interior's Standards for the Treatment of Historic Properties it can be considered categorically exempt from CEQA (14 CCR § 15331).” If the Rispin Mansion Community Park and Landscape Rehabilitation Project meets the Standards, City of Capitola Planning staff can make a determination that the project will not have an adverse effect on an historic resource per CEQA.

### Qualifications

Leslie A. G. Dill, Partner of the firm Archives & Architecture, has a Master of Architecture with a certificate in Historic Preservation from the University of Virginia. She is licensed in California as an architect. Ms. Dill is listed with the California Office of Historic Preservation as meeting the requirements to perform identification, evaluation, registration, and treatment activities within the professions of Historic Architect and Architectural Historian in compliance with state and federal environmental laws. The state utilizes the criteria of the National Park Service as outlined in 36 CFR Part 61.

### Review Status and Methodology

For this report, Leslie Dill reviewed historical documentation and evaluations, including the *National Register Nomination* written by Robert L. Rivers of the City of Capitola, dated 09/15/1990; the *Historical and Architectural Assessment* prepared by Archives & Architecture LLC, dated 09/14/2010, and the *Rispin Gardens Park Concept Plan* by M. Sandoval Architects, Inc., dated 10/26/2010. These reports present the historical significance of the house and its immediate setting, and outline the character-defining features of the resource, as well as provide historic photographs. Ms. Dill also referred to the *Historic Context Statement for the City of Capitola* by Carolyn Swift, dated June 24, 2004, for additional background. From these evaluations, Ms. Dill extracted the list of character-defining features of the

mansion and its grounds, along with the significance of the historical associations.

Michael Arnone of Michael Arnone + Associates Landscape Architecture, the landscape architect of the project, met with Leslie Dill at the site, February 10, 2015, where they discussed the existing historic elements of the Rispin Mansion, as well as possible design approaches with regard to the Standards. Mr. Arnone provided A&A with an initial design, in the form of a set of progress prints dated April 11, 2015; Ms. Dill provided some feedback with some minor recommendations for consideration. The landscape architect revised and refined the drawings; then electronically forwarded the design for review. Ms. Dill provided some minor feedback for clarification, and the final submittal set, dated April 24, 2015, (fourteen sheets, titled CS, L-1.0 through L-1.12) was reviewed for this report.

### **Disclaimers**

This report addresses the project plans in terms of historically compatible design of the exterior elements of the project. The consultant is documenting the proposed plan designed by others with respect to commonly accepted historic preservation analysis. The consultant has not undertaken and will not undertake an evaluation or report on the structural conditions or other related safety hazards that might or might not exist at the site and building, and will not review the proposed project for structural soundness or other safety concerns. The Consultant has not undertaken analysis of the site to evaluate the potential for subsurface resources.

## **PROJECT DESCRIPTION:**

### **Character and Significance of the Existing Resource**

Per the National Register Nomination:

The Rispin Mansion is significant in the development history of the community of Capitola under Criterion B for the association with Henry Allen Rispin, who resided in the house from 1921 until 1929. Rispin made his first land purchase in Capitola in 1918 and would eventually own and control nearly all of the community until his economic collapse in 1929. He was responsible for transforming a sleepy little summer campground into a year-round seaside tourist attraction.

and

The “Rispin Years” began with Rispin’s dream of transforming Capitola into the “Riviera of the New World”. Rispin promptly renamed the town Capitola-by-the-Sea and soon commenced construction on the 10,000 square foot mansion, a significant architectural landmark located on the banks of Soquel Creek – a site from which Rispin could observe his wharf and beach area.

The building and grounds are described at length in the nomination forms. The following are the sections that describe the grounds and setting:

The Rispin Mansion is a 22-room, 10,000-square foot house on a 6.5-acre estate located on the banks of Soquel Creek in the community of Capitola. The house was constructed in 1921 in a Mission/Spanish Colonial Revival style for Henry Allen Rispin, a wealthy oil baron who was responsible for much of the development of Capitola during the 1920s. Building into the side of a hill, the four-level house is distinguished by concrete walls with plaster finish, hip and gabled tiled roofs, balustrade terraces, arched portico, and a massive chimney with six flues. The grounds include a concrete pool and fountain, and rock walls and steps. There is also a well house located along Wharf Road at the southwest corner of the property. The

mansion was left vacant by one of its owners over 30 years ago, and since that time vandals have stripped off or otherwise destroyed interior features. The grounds have not been maintained and are overgrown with poison oak, weeds, berry bushes, and other vegetation. The building, nevertheless, retains its integrity for the purposes of the National Register. The essential features of the exterior design are intact, having suffered no significant alterations or additions.

Major physical characteristics of the mansion [and grounds] include... a concrete pool and fountain, and rock walls and steps. There is also a well house located along Wharf Road at the southwest corner of the property. The 750 square foot well house has wood shingle siding and was built ca. 1922 in conjunction with the construction of the mansion...

The mansion's decorative exterior features include rock walls and steps, along with walkways leading to the once exquisitely landscaped grounds. Mediterranean-style pillars surround the portico and balcony above. The courtyard and terraces separate the stairs leading from the portico to the upper garden with its concrete pool and ornamental fountain...

### **Summary of the Proposed Project**

The proposed project is described on the project cover sheet, in excellent detail, as follows:

#### **Discussion of Intent**

The project goals for Rispin Park are to create a community park that provides passive recreation and focuses on the cultural, historical, and open space resources that are unique to the Rispin Mansion Site. The intent of the restoration is to provide examples of the architectural style of the mansion and to create a public awareness of the significance of the Mansion building and grounds as part of the history of the City of Capitola. It should be stated that the park is not intended to be an exact replication of the mansion grounds during the time it was the residence of Henry Rispin. A summary of the existing historic elements and the proposed modifications are explained below and noted on the Site Plan.

#### **Wharf Road Wall, Entry Arch and Entry Staircase:**

- Portions of the Existing wall along Wharf Road will remain unchanged, while some sections of the existing wall height will be reduced to 30" with a 30" decorative metal fence on top. One portion of the wall at the southern end of the road frontage will be removed to allow a new universally accessible entrance to the park. The section to be removed will incorporate a new column to match the existing last column at the southern terminus of the wall. Bollards and metal fencing will be added to the new park entrance
- Steps and side walls of the staircase at the entry will be rebuilt and repaired. The Arch and side walls will be painted to match the Mansion
- Existing wood gate to be removed and stored for display with other artifacts

#### **Arbor:**

- New columns will match historic columns found on site in height and architectural detail
- Spacing of columns and location will be changed to accommodate new universally accessible path, and mature oaks on site
- New vine species compatible with native oaks will be selected

#### **Sundial:**

- Existing sundial base will remain in its present location. Pedestal will be rebuilt according to archive photographs. New, contemporary sundial/compass will be chosen, no archive photos are available that show the sundial piece.

**Overlook:**

- Existing overlook columns and base wall to remain. All caps and balustrades to be rebuilt according to archive photographs and existing artifacts on-site
- New benches in same location as historical shown in archive photographs, architectural details not discernable in photos. New benches will be simple without ornamentation

**Reflecting Pool:**

- Existing location and size of pool will remain unchanged. Depth of pool will be reduced to maximum of 6 inches. Repairs will be made to coping, pool sides and bottom. Plumbing and bottom of pool will be retrofitted to incorporate rainwater harvesting system.
- Brick path around pool will be installed, consistent with archive photos.
- New sculpture in center of pool will replace water feature(s) shown in archive photos. New sculpture will be distinctly different in style than those of the Rispin period.
- A tile mosaic is proposed for the bottom of the fountain. Mosaic will be commissioned by Capitola Arts Commission.

**Wall Fountain and Lower Sitting Area behind Wall Fountain:**

- Existing fountain will be repaired to working condition. Missing parts will be reconstructed using archive photographs and site artifacts.
- Urn will be selected to match historic using archive photographs.
- New fountain spout will be selected, historical fountain spout style not discernable in photos. New fountain spout will be simple without ornamentation.
- Lower seating area behind fountain and balustrade wall from grand staircase will be repaired according to archive photographs and existing artifacts on-site. Pathway from brick landing to seating area will be rebuilt.

**Grand Staircase:**

- All walls, columns, column caps, brick landings, to be repaired according to archive photographs and existing artifacts on-site. Steps to be rebuilt
- A new metal handrail as per code will be added on each side, mounted in ground outside of cheek wall.

**Miscellaneous Garden Features:**

- 12" high concrete wall along old walkway at northwest corner of park to remain
- Rock fossil walls by staircase to remain
- Stone wall at north end of park by new ramp to remain
- Existing 18" wide red concrete steps north of arbor to remain; add handrail as per code
- Existing 4' wide concrete steps by Game Table area to remain; add chain barricade and sign to close off

**Additional Scope of Note, Not Listed on the Title Page:**

- Nature play
- Bocce ball
- Murals at the boarded-up mansion windows

**SECRETARY'S STANDARD'S REVIEW:**

The *Secretary of the Interior's Standards for Rehabilitation* (Standards), originally published in 1977 and revised in 1990, include ten standards that present a recommended approach to repair, while preserving those portions or features that convey a resource's historical, cultural, or architectural values.

Accordingly, Standards states that, "Rehabilitation is defined as the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values." Following is a summary of the review with a list of the Standards and associated analysis for this project:

**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.”**

ANALYSIS: The new use as a community park requires minimal changes to this property’s distinctive materials, features, spaces, and spatial relationships, and also acts as the catalyst for restoration and interpretation of the historic grounds. The project will repair many damaged original elements and restore or interpret many missing historic features.

The new use does require some alteration to original fabric and inclusion of new elements, to provide security and safety to the public and for other proposed programming needs. As per the following specific rehabilitation analysis, these alterations are compatible with the Standards.

Because the overall character and specific character defining features are preserved in this proposal, and because all new elements and alterations are compatible with the Standards, the proposed use is compatible with the historic character of the resource, and the project meets Standard 1.

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

ANALYSIS: The overall historic character of the landscape setting for the Rispin Mansion will be preserved in this project. The overall spatial character, in particular, is proposed to be preserved and restored. The more formal, open elements of the landscape—the oval lawn, the pool, walkways, balustrades, fountains, etc.—will be preserved within the larger, more dense and natural setting.

The integration of the historic house (not proposed for alteration in this project) and its setting will be preserved in the project. One example is the proposed maintenance of the pathways, drives and steps that link the house to the landscape. Another example of this is the preservation of the landscape elements that match the house materials and its eclectic-revival style, including such features as the concrete and plaster classical balusters and the fountain.

One major historic element is proposed for some alterations. Segments of the historic wall along Wharf Road will be lowered for improved views into the property for security, and one end segment of the historic wall will be removed for improved community access. The historic spatial relationship and clear intent of this element was to provide a visual division between the residential grounds and the rest of the City (especially Wharf Road). Even with the alterations to the wall to provide de-facto visual access between the street and the park, the new design of the historic wall will provide a strong visual image of separation and continue to represent the historic design associations. Specifically, the preservation of almost the full length of the lower portion of the original wall, the preservation of the full-height grand main arch entrance, the preservation of a long segment of the original full-height wall to the north, as well as the addition of new materials that suggest separation—while providing visual access—between the grounds and the sidewalk, maintain the character-defining spatial relationship between the park and the community at large (see also Standard 9).

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 architectural elements from other historic properties, will not be undertaken.”**

ANALYSIS: There are no proposed new elements that might be mistaken for original features. The majority of the proposed building elements, including balusters, cap rails, steps, walls, and fountains, are existing and proposed to be preserved, or are replacements-in-kind that have adequate physical and photographic documentation. Some new features (such as the materials and forms of the amphitheater area) are subtly differentiated from the original design, so will not create a false sense of history from presenting a false appearance of original fabric.

Other new features, such as the site furniture (trash bins, bollards, game tables, etc.), are compatible yet differentiated from the historic materials (See also Standard 9). In particular, these elements are all consistent with each other as being painted metal, as will be the required new handrails and new main wall railings. The consistency of the new design vocabulary creates a well-defined visual identification of the new elements, providing further clarity as to the true sense of historical development over time.

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

ANALYSIS: It is understood that no existing changes to the residence have acquired historic significance in their own right; nevertheless, none of the post-Rispin alterations are proposed for removal. Instead, these elements are proposed to be integrated into the rehabilitation plan. Specifically, the concrete steps and foundation slabs that were built during the tenure of the Order of the Poor Clares will be retained as landscape features (see also Standard 9).

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

ANALYSIS: The features and finishes that characterize the historic landscape design are shown as preserved on the proposed drawings. Specifically, this includes elements that will be preserved in place, broken or worn elements that will be repaired, and missing elements that are proposed to be restored using adequate documentation.

#### **Existing to be Preserved**

Each of the following elements has been identified as a character-defining feature of the Rispin Mansion. All of the following are proposed for preservation in-place:

- One large portion of the existing full-height Wharf Road Wall, at the north end, will be preserved.

- Portions of the remainder of the Wharf Road Wall will be preserved and altered (see Standard 9)

- The existing Front Entry Arch and immediate side walls will be preserved and painted to match the Mansion.

- The existing wood Front Entry gate is proposed to be removed and stored for display with other artifacts

- The existing Overlook columns and base wall are proposed to remain

- The existing location and size of the Reflecting Pool is shown to be preserved

The Grand Staircase walls, columns, column caps, and brick landings will be preserved

Not identified as historically significant, but also proposed for preservation are the following:

The low concrete wall along old walkway at the northwest corner of park is planned for continued use

The rock fossil walls by the staircase will be preserved

The stone wall at north end of park, by the new ramp, is proposed to remain

The existing 18" wide red concrete steps north of arbor are planned to remain

#### **Existing to be Repaired/Replaced in-kind**

The following historic character-defining features are extant, but in disrepair or partially missing. Each of them is proposed to be rebuilt (see also Standard 6). Where the parts are missing, the broken elements will be restored based on the existing element (see "restored" list below):

The steps and side walls of the staircase inside the Front Entry Arch will be repaired and rebuilt according to existing parts on-site

All caps and balustrades at the Overlook to be repaired and rebuilt according to archive photographs and existing artifacts on-site

At the Reflecting Pool, repairs will be made to coping, pool sides and bottom (see also Standard 9 for alterations)

Existing Wall Fountain will be repaired to working condition (see also Standard 9 for alterations)

Lower Seating Area behind fountain and balustrade wall from grand staircase will be repaired  
Steps to be rebuilt

#### **To Be Restored (based on historic photographs and physical evidence at the site)**

The following elements are proposed to be rebuilt or restored, based on historic photographic evidence and on physical evidence (existing whole or broken parts) at the site:

Based on historic photographs and physical evidence, the new Arbor columns will be fabricated to match existing historic columns on site in height and architectural detail  
Existing sundial base will remain in its present location. Pedestal will be rebuilt according to archive photographs

Missing Overlook caps and balustrades will be fabricated to match the original, based on existing elements on site

Brick path around Reflecting Pool will be installed, consistent with archive photos, and based on existing elements on site

Existing Wall Fountain will be repaired to working condition. Missing parts will be reconstructed using archive photographs and based on existing elements on site

Missing Lower Seating Area elements will be restored according to archive photographs and existing artifacts on-site

Missing Urns will be selected to match historic urns using archive photographs

Missing Pathway from brick landing to Lower Seating Area will be rebuilt according to archive photographs and existing artifacts on-site

Each of these treatments is in keeping with the Standards, based on the historic documentation available and the existing physical evidence available.



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.”**

ANALYSIS: Deteriorated historic features are indicated clearly on the drawings for repair and replacement, as appropriate for the condition of each element and as noted in Standard 5. The remainder of the historic materials and features are proposed to be preserved in the project drawings. The intent of this Standard is met in the proposed design.

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.”**

ANALYSIS: No chemical treatments are shown as proposed in this proposed phase of work.

The project does include some painting of historic elements; this is an appropriately gentle treatment for materials that were originally painted.

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

ANALYSIS: Archeological resources are not evaluated in this report.

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 shall 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.”**

ANALYSIS: As listed in the analysis in Standard 5 and 6 above, the project scope includes some features that will be preserved, repaired, and restored. The scope also includes some original features that will be altered and some features that are identified in the historic design, but not fully documented. The project includes some new elements, as well.

In general, the alterations are respectful of the historic fabric in the larger historic resource while the replacement elements and new elements are compatible yet differentiated per this Standard. Furthermore, these alterations and new elements are treated consistently within the overall project scope, providing a coherent, understandable composition that blends the historic resource with the new use.

## Alterations

The following elements are proposed for alteration to accommodate the new use of the grounds as a community park. Each element listed has specific analysis:

Portions of the existing wall along Wharf Road will be reduced to 30” with a 30” decorative metal fence on top. One portion of the wall at the southern end of the road frontage will be removed to allow a new universally accessible entrance to the park. The section to be removed will incorporate a new column to match the existing last column at the southern terminus of the wall.

ANALYSIS: Per the analysis in Standard 2, the alterations to the Wharf Road Wall will preserve the spatial relationship between the mansion and grounds, and between the grounds and the larger surrounding community. The proposed metal fence infill sections are compatible with the design because they have a compatible scale—the relatively long stretches of repetitive elements will appear substantial, similar to the scale and visual strength of the original wall. The balustrades will be differentiated by their materials and their permeability.

Spacing of arbor columns and the arbor location will be altered from the historic design to accommodate new universally accessible path and mature oaks on site.

ANALYSIS: The original arbor is not extant, so the relocation of the columns will not destroy historic fabric. The relocation is compatible with the original design by emulating the footprint. It will be differentiated through its total integration with the surrounding new elements of the project, including new plants, pavement, etc.

The reflecting pool will be reduced to a maximum of 6 inches deep. Plumbing and bottom of pool will be retrofitted to incorporate rainwater harvesting system. Existing location and size of pool will remain unchanged. A new tile mosaic is proposed for the bottom of the fountain. Mosaic will be commissioned by Capitola Arts Commission.

ANALYSIS: The proposed pool design will be compatible with the historic grounds, as it will remain a reflecting pool. It will be differentiated by its new materials—the tile floor can be expected to be differentiated because it will be an art project.

A new metal handrail as per code will be added on each side of the Grand Staircase, mounted in ground outside of cheek wall. Existing 18” wide red concrete steps north of arbor to remain; add handrail as per code.

ANALYSIS: The handrails will be compatible physically with the original materials, as they will be secured adjacent to the historic fabric, rather than damaging the original cap rails. They will be visually compatible by their simple, arching form. The proposed handrails will be differentiated from the original historic fabric by its material choice.

## Replacement Elements

The following elements are missing at the site, but have a historic basis in the original design. They are seen in historic photographs; however, the photographs do not provide adequate documentation for an accurate restoration. These missing elements are proposed to be interpreted with varying, appropriate levels of differentiation:

New, contemporary sundial/compass will be chosen, no archive photos are available that show the sundial piece.

ANALYSIS: The new compass is proposed to be differentiated through its modern materials

New overlook benches will be located as shown in archive photographs. The details of the missing benches are not discernable in photos. New benches will be simple without ornamentation

ANALYSIS: The benches are proposed to be compatible with the known historic benches by the choice of materials. They will be appropriately differentiated from the original

design through their simplified design.

New sculpture in center of reflecting pool will replace water feature(s) shown in archive photos. New sculpture will be distinctly different in style than those of the Rispin period.

ANALYSIS: Because the sculpture is proposed to be distinctly different, the element meets the intent of this Standard.

New head for the wall fountain spout will be selected, historical fountain spout style not discernable in photos. New fountain spout will be simple without ornamentation.

ANALYSIS: The new spout is proposed to be differentiated through its modern materials

### **New Elements**

The following elements are not a part of the historic design of the Rispin Mansion. They are proposed as part of the rehabilitation of the property for community use. Each new element is analyzed for its compatibility and differentiation from the historic Rispin Mansion:

Amphitheater design and detailing

ANALYSIS: The proposed amphitheater elements are close in materials and size to the historic elements that surround them, so they are clearly compatible. The amphitheater elements will be differentiated subtly, though a different cap rail and step profile.

Metal fencing at the grand staircase

ANALYSIS: Per the handrail analysis noted above, the metal security fencing and gate will be visually compatible with the larger historic balusters by their design being simple and relatively delicate, not ornate or heavy. The fence will be subordinate to the heavier, more ornate historic elements. Also of note, the slight curve in the gates is in keeping with the curves of the historic stair walls. The fence and gate will be differentiated from the original historic fabric because it is painted metal (see also the Modern Site Furnishings analysis, below).

Modern site furnishings –trash/recycling bins, removable bollards, bike bollards, picnic tables, game tables, park benches (in non-historic locations), dog clean-up station, and drinking fountains, park lighting, dance footprint pavers, bocce ball court, and nature play elements.

ANALYSIS: The site furniture is proposed to be compatible in scale and size; the elements are not massive and each has small details, such as slats or fluting, so they will be perceived subordinate to the traditional elements of the historic grounds. They are all also consistently proposed to be differentiated through the use of painted metal, a material not otherwise used at the Rispin Mansion.

Pavement on new and restored pathways

ANALYSIS: The historic design showed a combination of formal and natural surfaces. The restoration of historic brick pavement patterns is reviewed above (see Standard 5). The remaining new pavement surfaces are proposed to be of a form and material that is compatible with the more natural edges of the historic grounds. The new pathways will be differentiated by their modern materials.

Signs and their settings

ANALYSIS: The sign design is only reviewed for approximate scale of their visual elements and their placement around the proposed park. The signs are in keeping with the scale and sightlines of the historic grounds. There is no need to differentiate them.

Note: There are no alterations proposed for the historic residence except paint in the form of murals on the boarded-up windows, not on the historic building walls.

- 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: The proposed design would preserve the essential form and integrity of the history of the property. The alterations will be reversible; specifically, the high wall could be restored using documentation and physical evidence; the reflecting pool remains in its original form beneath the proposed shallow alteration, and other elements could be removed.

**Conclusion**

The currently proposed Rispin Park project meets the *Secretary of the Interior’s Standards for Rehabilitation of Historic Properties*. It is the professional opinion of Archives & Architecture that staff can make a determination that the project will not have an adverse effect on an historic resource per CEQA.