

4.4 CULTURAL RESOURCES

This chapter analyzes the broad environmental effects of the Specific Plan with respect to the cultural resource in the Specific Plan Area.

A. Regulatory Framework

This section summarizes key federal, State and City statutes, regulations and policies that would apply to the Specific Plan.

1. Federal Laws and Regulations

a. National Historic Preservation Act

The National Historic Preservation Act of 1966 (NHPA) established the National Register of Historic Places (NRHP) as the official designation of historical resources, including districts, sites, buildings, structures and objects. Nominations are listed if they are significant in American history, architecture, archaeology, engineering and culture.

For a property to be eligible for listing in the NRHP, it must meet one or more criteria for significance and retain integrity. The seven aspects of integrity are location, design, setting, materials, workmanship, feeling and association.

Sites less than 50 years of age, unless of exceptional importance, are not eligible for the National Register.

Listing in the NRHP does not entail specific protection for a property, but it does guarantee recognition in the planning for federal or federally-assisted projects as defined in Section 106 of the NHPA, eligibility for federal tax benefits and qualification for federal historic preservation assistance. Project effects on properties listed in the NRHP must be evaluated under CEQA.

b. Secretary of the Interior's Standards for Identification

The Secretary of the Interior's Standards and Guidelines for archaeology and historic preservation are not regulatory and do not set or interpret policy.

They are intended to provide technical advice about archeological and historic preservation activities and methods. These Standards and Guidelines were effective as of September 29, 1983 and are prepared under the authority of Sections 101(f) (g), (h) and Section 110 of the NHPA, as amended. The Standards and the philosophy on which they are based result from nearly twenty years of intensive preservation activities at the federal, State and local levels. The purposes of the Standards are:

- ◆ To organize the information gathered about preservation activities.
- ◆ To describe results to be achieved by federal agencies, States and others when planning for the identification, evaluation, registration and treatment of historic properties.
- ◆ To integrate the diverse efforts of many entities performing historic preservation into a systematic effort to preserve our nation's culture heritage.

The following groups or individuals are encouraged to use these Standards:

- ◆ Federal agency personnel responsible for cultural resource management pursuant to Section 110 of the NHPA, as amended, in areas under federal jurisdiction. A separate series of guidelines advising federal agencies on their specific historic preservation activities under Section 110 is in preparation.
- ◆ State Historic Preservation Offices (SHPO) responsible under the NHPA, as amended, by making decisions about the preservation of historic properties in their states in accordance with appropriate regulations and the Historic Preservation Fund Grants Management Manual. The SHPO serve as the focal point for preservation planning and act as a central state-wide repository of collected information.
- ◆ Local governments wishing to establish a comprehensive approach to the identification, evaluation, registration and treatment of historic properties within their jurisdictions.
- ◆ Other individuals and organizations needing basic technical standards and guidelines for historic preservation activities.

2. State Laws and Regulations

a. California Register of Historic Resources

The California Register of Historical Resources (CRHR) establishes a list of properties to be protected from substantial adverse change (Public Resources Code Section 5024.1). An historical resource may be listed in the California Register if it meets any of the following criteria:

- ◆ It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
- ◆ It is associated with the lives of persons important in California's past.
- ◆ It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic value.
- ◆ It has yielded or is likely to yield information important in prehistory or history.

The CRHR includes properties that are listed or have been formally determined to be eligible for listing in the NRHP, State Historical Landmarks and eligible Points of Historical Interest. Other resources require nomination for inclusion in the CRHR. These may include resources contributing to the significance of a local historic district, individual historical resources, historical resources identified in historic resource surveys conducted in accordance with SHPO procedures, historic resources or districts designated under a local ordinance and local landmarks or historic properties designated under local ordinance.¹

b. CEQA Regulations Regarding Human Remains

Section 15064.5 of the State CEQA Guidelines specifies procedures to be used in the event of an unexpected discovery of Native American human remains on nonfederal land. These procedures are outlined in Public Resources Code

¹ CEQA Technical Advice Series website, CEQA & Historical Resources, http://ceres.ca.gov/topic/env_law/ceqa/more/tas/page2.html, accessed February 7, 2006.

Sections 5097 and 5097.98. These codes protect such remains from disturbance, vandalism and inadvertent destruction; establish procedures to be implemented if Native American skeletal remains are discovered during construction of a project; and establish the Native American Heritage Commission (NAHC) as the authority to resolve disputes regarding disposition of such remains.

c. Health and Safety Code, Section 7052 and 7050.5

Section 7052 of the Health and Safety Code states that the disturbance of Native American cemeteries is a felony. Section 7050.5 requires that construction or excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If determined to be Native American, the coroner must contact the California NAHC.²

d. Local and Tribal Intergovernmental Consultation (Senate Bill (SB) 18)

Implementation of Senate Bill 18 (SB 18), which went into effect January 1, 2005, set forth new requirements for local governments (city and county) to consult with Native American tribes to aid in the protection of traditional tribal cultural places through local land use planning.³ The intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early stage of planning, for the purpose of protecting, or mitigating impacts to, cultural places. The purpose of involving tribes at these early planning stages is to allow consideration of cultural places in the context of broad local land use policy, before individual site-specific, project-level land use designations are made by a local government.

² California Native American Heritage Commission's website, <http://ceres.ca.gov/nahc/discovery.html>, accessed February 7, 2006.

³ SB 18 amends Government Sections (GC) 65040.2, 65092, 65351 and 65560, while adding GC sections 65352.3, 65352.4 and 65562.5.

e. California Native American Historical, Cultural and Sacred Sites Act (CNAHCSSA)

The CNAHCSSA applies to both State and private lands. The Act requires that upon discovery of human remains, that construction or excavation activity cease and that the county coroner be notified. If the remains are of a Native American, the coroner must notify the NAHC. The NAHC then notifies those persons mostly likely to be descended from the Native American remains. The Act stipulates the procedures the descendants may follow for treating or disposing of the remains and associated grave goods.⁴

f. Public Resource Code, Section 5097

Public Resources Code, Section 5097 specifies procedures to be followed in the event of the unexpected discovery of human remains on nonfederal land. The disposition of Native American burial falls within the jurisdiction of the NAHC which prohibits willfully excavating removing, destroying, injuring or defaming any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands.

The City of Santa Rosa is required to comply with Public Resource Code Section 5097.5 for its activities on publicly-owned land.⁵

g. Public Resources Code, Section 21083.2

This code specifies the responsibilities of the lead agency to determine whether a project may have a significant effect on archaeological resources. If it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts to be made to permit any or all of these resources to be preserved in place or left in an un-

⁴ Natural Resources Conservation Service's website, <http://www.arrowheads.com/burials.htm#CALIFORNIA>, accessed February 7, 2006.

⁵ Official California Legislative Information's website, <http://www.leginfo.ca.gov>, accessed February 7, 2006.

disturbed state. The code also details required mitigation measures if unique archaeological resources are not preserved in place or not left in an undisturbed state. A project applicant must provide a guarantee to the lead agency to pay one-half the estimated cost of mitigating the significant effects of the project on unique archaeological resources. In determining payment, the lead agency shall give due consideration to the in-kind value of project design or expenditures that are intended to permit any or all archaeological resources or California Native American culturally significant sites to be preserved in place or left in an undisturbed state.

3. Local Regulations and Policies

a. Relevant City of Santa Rosa General Plan Goals and Policies

The following lists applicable General Plan goals and policies contained in the Historic Preservation Element most pertinent to the Specific Plan in regards to cultural and historical resources.

Goal HP-A: Protect Native American heritage.

- ◆ **Policy HP-A-1:** Review proposed developments and work in conjunction with Sonoma State University's Northwest Information Center to determine whether sites contain known Native American resources or have the potential for such resources.
- ◆ **Policy HP-A-2:** Require that areas found to contain significant artifacts be examined by a qualified consulting archaeologist for recommendations concerning protection and preservation.
- ◆ **Policy HP-A-3:** If cultural resources are encountered during grading, avoid altering the materials and their context until a qualified cultural resource consultant has evaluated the situation and recorded identified cultural resources.

Goal HP-B: Preserve Santa Rosa's historic structures and neighborhoods.

- ◆ **Policy HP-B-1:** Ensure that alterations to historic buildings and their surrounding settings are compatible with the character of the structure

and the neighborhood. Ensure that specific rehabilitation projects follow the Secretary of Interior's Standards for Rehabilitation to a reasonable extent, taking into consideration economic and technical feasibility.

- ◆ **Policy HP-B-2:** Preserve significant historic structures. Consider various alternatives to demolition of these structures, including the adaptive reuse of historic buildings for contemporary uses.
- ◆ **Policy HP-B-8:** Preserve sites that are eligible for the National Register of Historic Places and pursue listing eligible sites in the Register.

Goal HP-C: Increase public participation in the historic preservation process.

- ◆ **Policy HP-C-1:** Prepare and distribute educational guides and walking tour brochures of places of historical, architectural or cultural interest in Santa Rosa, to increase public awareness of these resources.
- ◆ **Policy HP-C-2:** Hold neighborhood meetings to achieve the following:
 - Increase public awareness of preservation issues and opportunities;
 - Provide information on the historic designation process; and
 - Alert neighborhoods, when necessary, to the pending loss of significant buildings or other features.
- ◆ **Policy HP-C-3:** Educate citizens about Santa Rosa's historic past by creating a lecture program for presentation to community groups and school classes.

b. City of Santa Rosa Zoning Code

The Santa Rosa Zoning Code, Title 20, provides for a Historic (-H) Combining District (20-28.040) "to preserve and/or enhance neighborhood character and residential privacy within designated historic districts by establishing height limits for structures proposed within the combining district that are more restrictive than the height limits of the primary zoning district."

c. City of Santa Rosa 1988 Preservation Ordinance

The 1988 Preservation Ordinance was created by the City's Cultural Heritage Board. Santa Rosa's on-going support of preservation planning is also mentioned in the City's General Plan, which includes a separate Preservation Element for Historic Resources. Railroad Square is called out as an example of a historic landmark.

B. Existing Conditions

This section describes the general existing conditions of the cultural and historical resources found in the Specific Plan Area.

1. Methodology

In the Specific Plan Area, there are five Historic Preservation Districts, eight Historic Landmarks, seven archaeological sites and fifteen historic structures that are listed or eligible for listing on the various local, State and national registers.

Literature reviews and cultural surveys were conducted to identify archaeological and historical resources in the Specific Plan Area. It should be noted that the literature review for historic resources was made for the entire Specific Plan Area, whereas the pedestrian archaeological and historic structure survey was conducted only in Specific Plan Areas identified as higher priority at the time of the survey. The record search for these cultural resources was conducted at the Northwest Information Center (NWIC) of the California Historical Resources Information System, which is housed at Sonoma State University. The records search included a review of all site records and study reports on file within a 0.5-mile radius of the Specific Plan Area. Included in the review were the California Inventory of Historical Resources (California Department of Parks and Recreation 1976)⁶ and the California Office of His-

⁶ California Department of Parks and Recreation, 1976, *California Inventory of Historic Resources*, Sacramento: State of California Department of Parks and Recreation.

toric Preservation's (CA-OHP) Five Views: An Ethnic Historic Site Survey for California,⁷ California Historical Landmarks,⁸ California Points of Historical Interest⁹ and the Historic Properties Directory Listing.¹⁰ Depending on the location and type of site, a combined pedestrian and/or windshield survey was performed in the Specific Plan Area by an archaeologist and an architectural historian from Garcia and Associates.

2. Archaeological Resources

Archaeological sites in the Specific Plan Area are described in Table 4.4-1 and found to be located in three of the seven Sub-Areas. These sensitive cultural resources are potentially eligible for listing in the NRHP and the CRHR.

3. Historic Structures

Exceptionally significant buildings have been designated Landmarks, and historic neighborhoods have been designated Preservation Districts (PDs) by the City of Santa Rosa's Cultural Heritage Board (SRCHB)¹¹. Seven historic PDs have been identified in the City of Santa Rosa, of which five are located within the Specific Plan Area: Olive Park PD, St. Rose PD, Cherry Street PD, Railroad Square PD and West End PD. Four historic preservation districts are situated within the Historic Residential Sub-Areas and one historic district is in the Railroad Square Sub-Area. A portion of the Burbank Gardens PD is included in the Park and Gardens Sub-Area.

⁷ CA-OHP, 1988, *Five Views: An Ethnic Historic Site Survey for California*, Sacramento: State of California Department of Parks and Recreation.

⁸ CA-OHP, 1990, *California Historical Landmarks*, Sacramento: State of California Department of Parks and Recreation.

⁹ CA-OHP, 1992, *California Points of Historical Interest*, Sacramento: State of California Department of Parks and Recreation.

¹⁰ CA-OHP, 2005, *Historic Properties Directory Listing by City* (through August 2005), Sacramento: State Office of Historic Preservation.

¹¹ City of Santa Rosa website's, <http://ci.santa-rosa.ca.us/default.aspx?PageId=287>, accessed February 7, 2006.

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TABLE 4.4-1 **ARCHAEOLOGICAL SITES LOCATED WITHIN THE SPECIFIC PLAN AREA**

Archaeological Site Designation	Land Sub-Area(s)	Reference(s)	Description
Historic Debris, along R.R. tracks	Railroad Corridor, Railroad Square	Newland and Esser (1999:3)	Depression Era “Hobo Jungle” deposits
Hukabetawi	Railroad Corridor	Windmiller (2002)	Pomo village site
Site A CA-SON-860/H	Courthouse Square	Fredrickson (1976); Mikkelsen, et al. (1985); Praetzellis and Praetzellis (1984); Praetzellis and Praetzellis (1985)	Prehistoric midden, lithic scatter/historic debris
Late 19 th century Chinatown	Courthouse Square	1893 Santa Rosa Waterworks Map	Possible Chinese related historic features and debris
Well shaft site CA-SON-1173/H	Courthouse Square	Praetzellis (1979); Praetzellis and Praetzellis (1979)	Historic deposit with ceramics, dietary bone and glass. “Old Post Office” moved to this location.
4-SON-11	Courthouse Square	Melander, et al. (1973)	Prehistoric lithic scatter
Kabeticiuwa	Courthouse Square	Fredrickson (1976); Windmiller (2002)	Pomo village site

Source: Garcia and Associates, February 2006.

The SRCHB has designated nineteen historic landmarks within the City. Eight of these are located in the Specific Plan Area, as shown in Table 4.4-2.

Other significant historic structures are those listed or eligible for listing on the NRHP and the CRHR. NRHP- and CRHR-listed properties within the Sub-Areas are shown in Table 4.4-3.

TABLE 4.4-2 **CITY OF SANTA ROSA DESIGNATED HISTORIC LANDMARKS
WITHIN THE SPECIFIC PLAN AREA**

Resource Number	Name	Address	Land Use Sub-Area
CHB8	DeTurk Round Barn	819 Donohue St.	Historic Residential
CHB13	Rosenberg Building	306 Mendocino Ave.	Courthouse Square
CHB16	Tripp House	1023 Fourth St.	Courthouse Square
CHB29	Luther Burbank Home and Garden	Sonoma & Santa Rosa Ave.	Historic Residential
CHB47	Rosenberg's Department Store	700 Fourth St.	Courthouse Square
CHB62	Sara Building Sibbald Donovan Manor	725 College Ave.	Historic Residential
CHB77	Church of One Tree	492 Sonoma Ave.	Residential
CHB148	Alexander House	412 Humboldt St.	Courthouse Square

Source: Garcia and Associates, February 2006.

4. Potentially Eligible Historic Resources

The historic resources survey of buildings and structures identified fifteen potentially significant historic resources not previously listed as NRHP, CRHR, or Santa Rosa Historic Landmarks. The findings are listed in Table 4.4-4. The potentially significant buildings are in three of the seven Sub-Areas: Imwalle Gardens, Railroad Corridor and Railroad Square. Due to the generalized level of surveying, there may also be other buildings within the Specific Plan Area that would be considered potentially significant.

5. Native American and Other Consultation

As part of the consultation process with Native American organizations and individuals, the NAHC was contacted with a request for information about

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TABLE 4.4-3 NRHP AND CRHR LISTED PROPERTIES WITHIN SUB-AREAS

NRHP Number	Year	Name	Address	Land Use Sub-Area
197000561	1870-1925	Railroad Square National Register Historic District	Bounded by West Third St, West 6th St, Davis St and Santa Rosa Creek	Railroad Square
1979000561	1888	Cannery Warehouse (Railroad Square NRHP contributor and eligible for individual CRHR listing)	46 West 6th St	Railroad Square
1979000561	1917	Former Cal Pak Cannery and Associated Water Tower (Railroad Square NRHP contributor and eligible for individual CRHR listing)	3 West Third St	Railroad Square
1979000561	1919	Cannery Plant #5 (Railroad Square NRHP contributor and eligible for individual CRHR listing)	60 West 6th St	Railroad Square
1979000559	1910	Old Post Office (Listed on the NRHP)	425 7th St	Courthouse Square
1994001497	1937	Rosenberg's Department Store (Listed on the NRHP)	700 4th St	Courthouse Square

Source: Garcia and Associates, February 2006.

sacred lands that may be located within the Specific Plan Area. A search of the Sacred Lands file housed at the NAHC did not result in the identification of any sacred lands within the Specific Plan Area. The NAHC provided a list of 16 local groups and individuals to contact for further information regarding local knowledge of sacred lands. Each group or individual was notified by mail and contacted by telephone. Ms. Kathleen Smith, affiliated with the Pomo Coast/Miwoks, expressed concerns about the possible presence of tra-

TABLE 4.4-4 POTENTIALLY ELIGIBLE HISTORIC RESOURCES OBSERVED IN SPECIFIC PLAN AREA

Sub-Area	Resource	Address	Construction Date	Assessor's Parcel No.	Historic Landmark Status
Railroad Corridor	Single family residence/ business	28 Maxwell Ct	Unknown	010-131-036	None
Railroad Corridor	Western Farm Wholesale	55 West 8th St	Unknown	010-161-036	None
Railroad Corridor	American Produce Co. Warehouse	21 West 7th St	1895	010-161-036	7N (Needs to be reevaluated; formerly NR status code 4-Appears eligible for National Register.)
Railroad Square	Fred Olivia House & Shop	124 West 6th St	1936	Unknown	3D (Appears eligible as a contributor to a fully documented district.)
Railroad Corridor	John H. and Ruth Cooper House	107 Sebastopol Rd	1906	125-123-010	6Y (Determined ineligible for NR by consensus through Section 106 process—Not evaluated for CR or Local Listing)
Railroad Corridor	Palin Bros. Building	35 Sebastopol Rd	1946	125-123-010	6Y (Determined ineligible for NR by consensus through Section 106 process—Not evaluated for CR or Local Listing.)
Imwalle Gardens	Single-family residence	691 West 3rd St	Unknown	125-041-022	None
Imwalle Gardens	Imwalle Gardens Complex (house, barn, greenhouse, shed, and retail building)	685 West 3rd St	1924	125-041-022	3D (Appears eligible as a contributor to a fully documented district.)
Imwalle Gardens	Single-family residence	655 West 3rd St	Unknown	125-041-022	None
Imwalle Gardens	Single-family residence	410 West 3rd St	c. 1920	125-041-022	None
Railroad Corridor	Two additional ancillary buildings at west end of 265 Roberts Ave. lot	265 Roberts Ave	Unknown	125-121-011	None
Railroad Corridor	Shamrock Materials Inc. Building	285 Roberts Ave	Unknown	125-121-011	None
Railroad Corridor	Fitzgerald Building	265 Roberts Ave	1921	125-121-011	3S (Appears eligible for NR as an individual property through survey evaluation.)
Railroad Corridor	Guanella Bros. Building	350 Roberts Ave	1941	125-121-011	6Y (Determined ineligible for NR by consensus through Section 106 process—Not evaluated for CR or Local Listing.)
Railroad Corridor	Oscar and Jennie Swanets House	113 Sebastopol Rd	1924	125-123-010	6Y (Determined ineligible for NR by consensus through Section 106 process—Not evaluated for CR or Local Listing)

Source: Garcia and Associates, February 2006.

ditional plants along Santa Rosa Creek, which cuts through the Specific Plan Area. Nick and Ken Tipon of the Federated Indians of Graton Rancheria and June Dollar of the Dry Creek Rancheria have been in informal consultation with the City regarding this project. Nick and Ken Tipon have requested that subsequent development under the Specific Plan be required to consult with the Tribe prior to submittal of entitlement applications. They have also expressed an interest in working with the City in the future to establish a more formalized pre-development consultation process.

Both the Sonoma County Library and Sonoma County Museum were also contacted for information regarding cultural or historic resources in the Specific Plan Area. Neither institution has responded to the written requests.

6. Paleontological Resources

A records search using the University of California's Museum of Paleontology web site¹² indicated that no paleontological resources exist on the project site itself. Also, since the Specific Plan Area is already developed and used for urban purposes, there is a very low possibility of finding any paleontological resources.

C. Standards of Significance

The Specific Plan would have a significant impact on archaeological and historical resources with regard to CEQA Guidelines if it would:

- a. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.
- b. Cause a substantial adverse change in the significance of an historical resource as defined in Section 15064.5.

¹² <http://www.ucmp.berkeley.edu/collections/catalogs.html> Search conducted November 14, 2006 by DC&E.

- c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.
- d. Disturb any human remains, including those interred outside of formal cemeteries.

D. Impact Discussion

This section analyzes potential cultural resources impacts for the Specific Plan Area. This discussion is organized by and responds to each of the potential impacts identified in the Standards of Significance.

1. Project Impacts

- a. Cause a substantial adverse change in the significance of an archaeological resource.

The record search and the limited survey have identified archaeological sites in the Specific Plan Area that risk impact from the proposed activities of the Specific Plan. Any activity in the Specific Plan Area that involves ground disturbance of any kind could adversely change or destroy an archaeological site which would be considered significant.

To address these potential risks, there are existing regulations that would help protect archaeological resources. Such measures include the Secretary of the Interior's Standards for Identification (Standards I and II), which requires survey activities to be conducted to document the information necessary to achieve defined preservation goals. Adherence to the Standards from the Secretary of the Interior guidelines are required by Policy HP-B-1 under the General Plan. In addition, General Plan Policy HP-B-8 requires sites to be preserved that are eligible for the National Register of Historic Places and pursue listing eligible sites in the Register. Additionally, the CNAHCSSA and Policies HP-A-2 and HP-A-3 under the General Plan require for proper notification of experts upon discovery of human remains, significant artifact, or cultural resources for proper assessment and to determine the necessity for construction or excavation activity to cease. Moreover, proper implementa-

tion of regulations from the Public Resources Code, specifically Section 21083.2, would diminish the potential impacts from any project involving the demolition or adverse change of an archaeological site that is listed on the NRHP or CRHR or is eligible for listing.

While the Specific Plan would need to comply with these regulations, new construction activities, including the widening of existing thoroughfares, that involve ground disturbance could destroy or significantly alter buried archaeological deposits. This would be a *significant* impact.

- b. Cause a substantial adverse change in the significance of a historical resource.

Given the several historical resources in the Specific Plan Area, development allowed under the proposed Specific Plan could involve the destruction and/or adverse alteration of the physical characteristics of a historical structure. In addition, the demolition, construction, renovation and relocation of buildings may adversely impact the historical character or setting of a historic district. Building and renovation staging areas may also have short-term impacts on the resources by detracting from the character of the historical districts.

However, existing regulations, policies and standards diminish these potential impacts. For example, the Secretary of the Interior's Standards for Identification (Standards I and II) require survey activities to be conducted to document the information necessary to achieve defined preservation goals. Adherence to the Standards from the Secretary of the Interior guidelines are required by Policy HP-B-1 under the General Plan. Additionally, the City's Preservation Ordinance of 1988 and General Plan Policies HP-B-2 to HP-B-8 are designed to preserve and enhance the City's historic structures and neighborhoods. For the former, Santa Rosa's Cultural Heritage Board reviews all proposed adverse impacts to historic structures and provides proper mitigation measures. Also, Goal HP-C under the General Plan, and all of its supporting policies, seek to increase public participation in the historic preservation process. Implementation of these policies would reduce the impact of deterioration by

increasing the awareness of Santa Rosa's historic wealth and encouraging public participation in the stewardship of these invaluable resources.

While the Specific Plan would need to comply with these regulations, any new construction activities, in the vicinity of a historical structure that is listed or eligible for listing on local, State or national registers could impact or alter the historic structure and/or the character or setting of the area. This would be a *significant* impact.

In addition, the use of excessive vibration-causing equipment during construction adjacent to historic structures could adversely affect historic resources. This would be a *significant* impact.

c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

To date, no paleontological resources have been identified within the Specific Plan Area. Although the potential exists for ground-disturbing activities to inadvertently impact an unknown resource, the likelihood of direct or indirect impacts is low due to the highly developed condition of the area. However, if these resources are inadvertently discovered, then the General Plan policies outlined in HP-A-2 and HP-A-3 (with assistance from a paleontologist) should be invoked as well as federal and State statutes protecting these resources from disturbance and destruction.

Therefore, the existing goals, policies and guidelines would diminish the environmental impact from potential destruction of unique paleontological resources, sites or unique geologic features resulting from development or redevelopment to a *less-than-significant* impact.

d. Disturb any human remains, including those interred outside of formal cemeteries.

No human remains are known to exist in the Specific Plan Area based on the negative results from the literature search and the consultation with the NAHC. Although the likelihood of encountering human remains is low,

existing regulations, policies and standards diminish these potential impacts. For example, the Secretary of the Interior's Standards for Identification (Standards I and II) require survey activities to be conducted to document the information necessary to achieve defined preservation goals. Adherence to the Standards from the Secretary of the Interior guidelines are required by Policy HP-B-1 under the General Plan. Additionally, the CNAHCSSA and Policies HP-A-2 and HP-A-3 under the General Plan require for proper notification of experts upon discovery of human remains and for construction or excavation activity to cease.

Therefore, the existing goals, policies and guidelines would diminish the environmental impact from accidental disturbance of any human remains to a *less-than-significant* impact.

2. Cumulative Impacts

Cultural resources such as historical, archaeological and paleontological resources in the Santa Rosa Urban Growth Boundary could be cumulatively impacted by future development and related construction activities in the region, as identified in the General Plan EIR. However, the 2002 General Plan EIR identified that with the policies included in the General Plan, that the potential for development under the General Plan to cumulatively impact cultural resources would be reduced to a less-than-significant level. The impacts resulting from the activities set forth in the Specific Plan are congruent with City of Santa Rosa's General Plan and require the same mitigations measures. Such regulations and mitigation include the monitoring of construction sites in proximity to known resources, immediate cessation of construction activity upon discovery of unidentified human remains and the protection of cultural resources. Since the Specific Plan would also be subject to the same regulations and policies, as well as the mitigation measures adopted as part of the Specific Plan, the Specific Plan would contribute to a *less-than-significant* cumulative impact.

E. Impacts and Mitigation Measures

Impact CULT-1: New construction activities, including the widening of existing thoroughfares, that involve ground disturbance could destroy or significantly alter buried archaeological deposits. This would be a *significant* impact.

Mitigation Measure CULT-1a: Archaeological monitoring shall be conducted during earth-disturbing activities in the areas of potential impact. If an archaeological site has been identified in the close vicinity of a construction project, the adverse impact shall be mitigated by conducting Phase I archaeological testing in order to determine the boundaries of the site, and to ensure site avoidance before the commencement of construction activities. If construction personnel locate buried cultural materials, work shall be halted or shifted to another area and a qualified archaeologist shall be contacted to determine proper treatment of the find.

Mitigation Measure CULT-1b: A worker orientation program shall be conducted prior to and during earth-disturbing activities in sensitive areas. The program shall summarize relevant laws and regulations that protect archaeological resources, and review applicable avoidance and minimization measures to protect archaeological resources. Exclusionary plastic mesh fencing shall be installed and maintained to prohibit the general public from disturbing sub-surface soils and impacting possible archaeological deposits.

Mitigation Measure CULT-1c: The City shall require consultation with Native American tribes whenever necessary prior to submittal of entitlement applications for land divisions and/or new construction to ensure the respectful treatment of Native American sacred places. Potential mitigation measures shall include but are not limited to site avoidance, site capping, integration of the site into a recreation space, or data recovery excavations.

Significance After Mitigation: Less than significant.

Impact CULT-2: Any new construction activities in the vicinity of a historical structure that is listed or eligible for listing on local, State or national registers could impact or alter the historic structure and/or the character or setting of the area. This would be a *significant* impact.

Mitigation Measure CULT-2a: Adverse impacts of new design elements on the character of a historic building or area shall be evaluated on a case-by-case basis in accordance with the various local, State and federal laws and regulations protecting these resources. Prior to construction, large format camera Historic American Landscape Survey (HALS) Level II black-and-white 8-by-10 inch archival quality prints produced by a professional photographer shall be accompanied by a report by a professional architectural historian. A minimum of twenty views shall be documented and two sets of prints shall be sent to the California State Library in Sacramento.

Mitigation Measure CULT-2b: Specific thoroughfare widening projects within the Specific Plan Area shall be designed so that projects do not detract from the character of the historic building or property. The SRCHB should review such projects for adequate mitigation measures before they are implemented.

Mitigation Measure CUTL-2c: A worker orientation program shall be conducted prior to and during construction activities in sensitive areas. The program shall summarize relevant laws and regulations that protect resources, and review applicable avoidance and minimization measures to protect historic resources. Exclusionary plastic mesh fencing shall be installed and maintained to prohibit equipment from impacting significant structures.

Significance After Mitigation: Less than significant.

Impact CULT-3: Excessive vibration-causing equipment in construction areas located less than 25 feet from significant historic masonry buildings and pile-driving within 200 feet of historic structures could have an adverse impact on the integrity of historic resources within the Specific Plan Area. This would be a *significant* impact.

Mitigation Measure CULT-3a: The use of heavy bulldozers and other excessive vibration-causing equipment in construction zones shall be excluded within 25 feet of significant historic buildings or structures. A system of spot-check monitoring shall also be performed in these locations to ensure that the historic resources do not sustain damage.

Mitigation Measure CULT-3b: The use of pile-driving equipment during construction activity shall be excluded within 200 feet of all eligible or potentially eligible historic resources; augers shall be used within 200 feet. A system of spot-check monitoring shall also be performed in these locations to ensure that the historic resources do not sustain damage.

Significance After Mitigation: Less than significant.

