

4.4 CULTURAL RESOURCES

4.4.1 Issues

Although the DSP planning area has been largely disturbed in modern history, obscuring resource visibility, subsurface work completed during development may expose or potentially damage undiscovered archaeological resources. Development may also impact historic resources, particularly buildings, through direct alteration, or by affecting the historic context.

4.4.2 Setting

Prehistory

Archaeological evidence suggests that human occupation of California began at least 12,000 years ago (Fredrickson, 1984). Early occupants appear to have had an economy based largely on hunting, with limited exchange, and social structures based on extended family units. Later, milling technology and an inferred acorn economy were introduced. This diversification of economy appears contemporaneous with the development of sedentism, population growth, and expansion. Sociopolitical complexity and status distinctions based on wealth are also observable in the archaeological record, as evidenced by an increased range and distribution of trade goods (e.g., shell beads, obsidian tool stone), which are possible indicators of both status and increasingly complex exchange systems.

Archaeological research has been conducted at four sites along the Laguna de Santa Rosa, just west of Cotati. Investigations begun in 1977 by archaeologists from Sonoma State University found a rich and diverse array of prehistoric artifacts that proved invaluable to the understanding of native inhabitants of the Laguna (Origer and Fredrickson, 1980). Information obtained during the investigations set a tentative beginning date for habitation along the Laguna at around 5000 BC, or 7,000 years ago. More recently, evidence was found indicating that the Laguna de Santa Rosa locale was in use approximately 11,000 years ago.

Ethnographic Period

Cotati lies near the boundary between two Native American ethnographic groups. At the time of Euroamerican contact with indigenous peoples, the region was controlled by the Coast Miwok, and to the north were their neighbors, the Southern Pomo. The Coast Miwok are differentiated from other ethnographic groups based on the language they spoke. Linguists consider the Coast Miwok language to be of the Penutian Linguistic Stock, which is believed to have entered the lower Sacramento Valley about 4,500 years ago. This language stock is further divided, and the family to which Coast Miwok belongs is the Utian language family. Linguistic evidence suggests that Utian speakers spread to occupy the marshlands surrounding San Francisco Bay between 4,000 and 2,500 years ago, displacing older groups in the area (Moratto, 1984). Moratto notes that the early Utian settlement pattern matches the distribution of historic marshlands with most Utian villages located at marsh margins prior to 200 BC.

The Coast Miwok economy reflects this early focus on marsh resources, with added emphasis on hunting and gathering in the hills of the North Coast Ranges. A typical Coast Miwok tribe inhabited a semi-permanent village from which they made trips to temporary, seasonal camps to obtain locally available resources (Kelly, 1978).

Sites often were situated near fresh water sources and in ecotones where plant life and animal life were diverse and abundant.

Drawing from Franciscan mission registers and other historical documents, Milliken (1995) compiled an encyclopedia of San Francisco Bay tribal groups and their geographic distribution. Milliken attributes "lands from the Cotati area west as far as Bloomfield and Two Rocks" to the Licatiut tribe of the Coast Miwok (Milliken, 1995). The nearest reported ethnographic sites are the villages of *kōta'ti*, described as being "just north of the town of Cotati," and *ūli'yōmi* (or *atcamōtcō'tcawi*), thought to be about four miles west of Cotati (Barrett, 1908).

Historic Period

Present-day Cotati was included in the Mexican land grant made to Juan Castañeda (Hoover et al, 1990) in 1844. Castañeda failed to finalize the grant, and in 1857, the U.S. Land Commission patented the 17,238-acre rancho to Thomas S. Page (General Land Office, 1857). Page and his sons ran a stock ranch on rancho lands from 1858 until Page's death in 1872.

The Cotate Rancho remained relatively intact during Page's lifetime despite the fact that some 4,500 acres of land was siphoned off by squatters, some of whom eventually paid Page for their land. Upon his death in 1872, Page left his heirs the Cotate grant stipulating that the rancho could not be divided until his youngest son, William, reached the age of 25. When William Page reached the appointed age in 1892, the sons were ready to begin dividing the rancho. Settlement in this southern Sonoma County community centered on newly formed Cotati, whose town plan was designed by Newton Smyth circa 1892. Unique for its hexagonal form, this was one of only two such town plats in the United States. In the 1898 County atlas (Reynolds and Proctor, 1898), the San Francisco-based Cotati Company advertised 8,000 acres of the rancho for sale.

During the latter part of the 19th century, there was a notable trend toward division of large holdings in and around Cotati. The earliest of these subdivisions broke large tracts of land into smaller farm parcels "large enough to accommodate a successful farming venture" (Praetzellis et al, 1989). The Cotati Company capitalized on this trend beginning in 1892 as the Page heirs divided the rancho lands into progressively smaller farm lots, with town lots focused around the plaza.

As the 20th century progressed, lots created through these subdivisions were generally too small to provide a family's primary source of income. In the past, large farms and ranches were relatively self sufficient; but families living on smaller plots and farms could not meet all their own needs. Work outside the home became increasingly necessary to sustain a family's economic viability, and there was greater reliance on goods sold at retail outlets.

A boon to the Cotati Company was the chicken ranching phenomenon that swept southern Sonoma County at the end of the 19th and beginning of the 20th centuries. While it was always a farming community, many families were drawn to the area by contemporary booster literature proclaiming poultry-raising to be a profitable and near effortless pursuit. During the early part of the 20th century, small-scale family-owned chicken ranches appeared throughout the southern part of the County, and Cotati, following on the heels of Petaluma, became a prime poultry area.

Division of rural lands also brought with it an increase in the number of people living in areas isolated from amenities readily found in town. As families began moving into the newly created rural subdivisions, the need for nearby groceries and supplies also grew. It was during this time frame that many small rural stores and shops opened their doors to provide needed supplies and services.

During the early years of the 20th century, the nearest railroad access for Cotati farmers was the Petaluma and Santa Rosa electric railroad that traveled along Stony Point Road, west of town. Farmers were forced to leave their products on the side of the track to await shipment because there was no depot. A group known as The Cotati Progressive League convinced the Northwestern Pacific Railroad that rail service was needed in Cotati, and in 1907 the Cotati Depot was opened (Breen, 1914). For a while, it looked like the Petaluma & Santa Rosa line might send a spur into Cotati but the plan eventually was dropped.

In the next decade, work on State Highway 1 (now U.S. 101) commenced, and by 1929 the Redwood Highway was paved from the Sausalito Ferry terminal to Cloverdale (LeBaron and Mitchell, 1993). For a while, it was not clear whether Cotati would profit from the highway, as an alternate route was proposed that would have shifted the present-day alignment to the east. Once the decision was made to route the new road through Cotati, local businesses rallied to make the town an interesting stop, if not the largest along the Redwood Highway. Old businesses were expanded, and new shops sprang up in Cotati, many incorporating the Spanish Revival architecture promoted for use along the highway.

In the early 1960s, two important events occurred in the Cotati area: the State chose a tract of land at the end of East Cotati Avenue as the site of a new state college, and Cotati incorporated as a city. When Sonoma State University opened the doors of its new campus in 1966, Cotati saw an immediate increase in its population, and the town became a popular gathering area for students. During the 1970s, it was a magnet for counterculture groups, and many downtown businesses catered to the student crowd.

Archaeological Resources

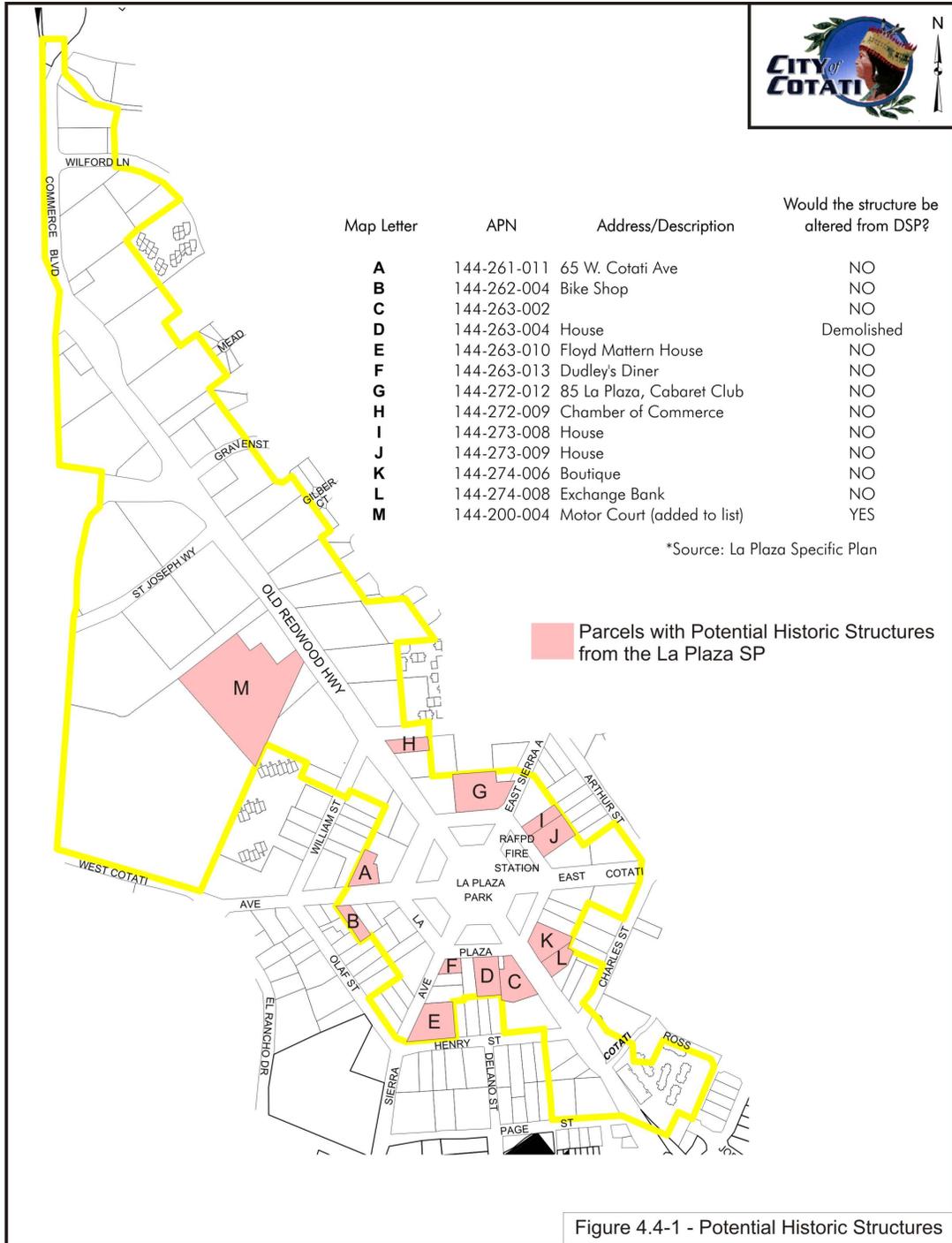
Survey for the presence of archaeological resources has been limited to specific projects that are generally small-scale and scattered throughout the City. However, based on these studies, there are seven known prehistoric archaeological sites within the Cotati that range from shell middens denoting prehistoric habitation to tool-making workshops containing obsidian waste flakes. Two archaeological sites in the City have been identified as historic-period sites containing 19th and early 20th century artifacts. Locations are kept confidential to protect the sites.

Historic Resources

The State of California recognizes the historical significance or potential significance of two resources in Cotati: the Cotati Downtown Plaza and the Cotati Women's Improvement Club, both of which are located within the DSP area.

There has been no systematic historic architectural survey of Cotati; however, 24 parcels, most situated on the Plaza, were listed in the 1991 La Plaza Specific Plan and Environmental Impact Report as containing possible historic buildings (Earth Metrics Incorporated, 1991). Thirteen of those properties are located in the DSP area and are shown in Figure 4.4-1. Some of the parcels shown on Figure 4.4-1 are not

listed in the DSP. None of these buildings would be affected by the development proposed under the DSP. The Motor Court on Old Redwood Highway was added to the list for consideration, given its age and relation to the highway. This set of buildings has been considerably altered and is no longer a representative example of such highway motels. There are several still in existence elsewhere on the highway that have been well maintained and restored and serve to represent the era.



As a result of private development projects over the years, 17 buildings in the City have been at least partially documented for architectural/historical significance. One is listed on the California Register of Historical Resources, and five appear to meet the California Register eligibility criteria. Table 4.4-1 lists properties that have been documented within the City, some of which have since been demolished. As indicated above, two of these (the Downtown Plaza, and the Cotati Women's Improvement Club) are located within the DSP area.

In addition to those resources documented previously, there are a number of structures 50 years or greater in age that may warrant additional study. As the plan timeline progresses, additional structures will reach the 50-year general threshold and may therefore warrant consideration.

4.4.3 Regulatory Setting

California Environmental Quality Act

CEQA provides criteria to evaluate whether a building, structure, object, or site is significant. Under CEQA Guidelines §15064.5(a), historic resources include the following:

- (1) A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code §5024.1, Title 14 CCR, Section 4850 et seq.)
- (2) A resource included in a local register of historical resources, as defined in §5020.1(K) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements of §5024.1 (g) of the Public Resources Code, shall be presumed to be historically or culturally significant.

Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

- (3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, providing the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be historically significant if the resource meets the criteria for listing on the California Register of Historic Resources (Pub. Res. Code §5024.1, Title 14 CCR, Section 4852) including the following:
 - (A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
 - (B) Is associated with the lives of persons important in our past;
 - (C) 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 values; or
 - (D) Has yielded, or may be likely to yield, information important in prehistory or history.

Table 4.4-1: Properties in the DSP Area Previously Documented for Historical Significance		
Registered Properties	Address	Description
Cotati Downtown Plaza*	NA	Plaza designed in 1892 with unique, hexagonal layout. State Historical Landmark #879; listed on the California Register of Historical Places
Appear Eligible for California Register		
Cotati Women's Improvement Club*	85 La Plaza	Craftsman-style building constructed in 1910
Frengle Farm	8260 Gravenstein Hwy	Early 20th century farmstead
Albertson House	100 Valparaiso Ave	Early to mid-20th century residence
Appear Ineligible for California Register		
	7311 Derby Rd	Demolished
	6067 Gilmore Rd	Ca. 1910 house and outbuildings
	850 W. Cotati Ave	Demolished
Trebino Ranch	10 Helman Ln	Demolished
Larsen Farmstead	7400 Gravenstein Hwy	Vernacular house constructed ca. 1900, and outbuildings dating to 1947
Christensen Farmstead	374 School St	Demolished
Nylander House	50 West Cotati Ave	Vernacular building constructed circa 1912
Cotati Fire Department	1 East Cotati Ave	Demolished
	910 East Cotati Ave	Demolished
Cotati Veterans Building	8505 Park Ave	Constructed in 1951
* Located in the DSP area		

- (4) The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to §5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in §5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be a historical resource as defined in Public Resources Code §5020.1(j) or 5024.1.

In accordance with CEQA, properties designated or eligible at all levels are deserving of protection by a lead agency when any undertaking proposes to demolish or alter any such property.

Cotati General Plan

The Economic Vitality Chapter of Cotati's General Plan specifies the following goals and policies for the community's historic buildings and features and archaeological resources:

Objective 11.3 Establish a Downtown Character which Preserves the historical “Old Town” feeling of the hub and promotes new development which is compatible in scale with existing structures.

11.3.5 Preserve existing structures with designated historical value

a) The City Council shall review the existing Historical Preservation Survey to determine its applicability. The City shall designate specific properties and structures that will help preserve the historical atmosphere in Cotati.

The Community Identity Chapter of the Cotati General Plan includes the following objectives, policies and programs regarding historic resources:

Objective 14.2 Preserve Historically and Architecturally Significant Structures and Sites

14.2.1 Identify individual structures and sites of local historical value and support their preservation

- a. The City Council may solicit funding from state, federal and other sources in order to preserve designated site throughout the community and especially around the Hub*
- b. An attempt shall be made to persuade property owners around the Hub to invest in restoring their buildings through the possible use of zoning, or redevelopment incentives.*

14.2.2 Whenever renovation or new construction is considered in archaeologically or historically sensitive areas, an archaeologist shall be consulted.

- a. Planning staff shall continue to implement the Historic Resources Inventory¹*

Native American-related Statutes

Public Resources Code §5097.90 stipulates that it is contrary to the free expression and exercise of Native American religion to interfere with or cause severe irreparable damage to any Native American cemetery, place of worship, religious or ceremonial site, or sacred shrine.

State Health and Safety Code §7050.5 and Public Resources Code §5097.94, §5097.98 and §5097.99 provide protection to Native American human burials and skeletal remains from vandalism and destruction and provide a regular means by which Native American descendants can make known their concerns regarding the need for sensitive treatment and disposition of Native American burials, skeletal remains and items associated with Native American burials. If human remains are exposed during construction, State Health and Safety Code §7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code §5097.98. If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission. The Native American

¹ Based on communication with City staff (Marsha Sue Lustig, pers. comm. June 25, 2007), the “Inventory” applicable to the planning area is the list adopted as part of the La Plaza Specific Plan, discussed in Section 4.4.4.

Heritage Commission will then contact the most likely descendent of the deceased Native American, who will serve as a consultant on how to proceed with the remains.

Draft DSP Policies Related to Historic Resources

The DSP addresses historic resources in a number of locations in the plan, including but not limited to the following:

Historic Cotati

Objectives – Through the following, it is possible to provide for sensitive and meaningful adaptive reuse of the plan area's historical resources:

H1: Respect and celebrate the area's heritage through careful restoration and addition to buildings and sites identified as historically meaningful

H2: Provide a meaningful background of historic buildings with which to sensitively complement new development

H3: During the development review process, analyze subject buildings/sites for restoration and reuse strategies and feasible preservation strategies

H4: Inventory cultural and historic resources appropriate for restoration and reuse

The following sites and/or buildings have been identified as meaningful and potentially worthy of restoration and adaptive reuse. This list is not intended to be exhaustive.

- A. Loyal Cotati Lodge (1911, renovated 1969)
- B. St. Joseph's Church (1908, currently Korean Baptist Church)
- C. Frenge Metal Shop (1930)
- D. Cotati School (1922, current City Hall)
- E. The Congregational Church (1907, Church of the Oaks)
- F. Women's Improvement Club (1909, synagogue)
- G. La Plaza
- H. Cotati Inn (1932)
- I. The Ross Home (1907, residence)

Historic Core

Objectives – As established in the revitalization strategy, the following objectives are set forth for the Historic Core area of the plan:

HC-1: Require restoration or renovation of federally, state or locally designated historic buildings to the maximum feasible extent.

Plan – This 2-block area receives sensitive attention through restoration, renovation and careful additions that maintain the existing 2-story character of the area. The historic core becomes the southern anchor and gateway to downtown and Cotati's public space at La Plaza Park providing for modest expansion of commercial space and dwellings in the form of flats, lofts or townhouses over ground floor commercial.

Preservation and Restoration – Along with providing for new investment and development in the Historic Core, maximizing Cotati's heritage and its physical assets is paramount to the revitalization of Downtown and to the spirit of the community as a whole. For example, several fine and important buildings exist in the plan area that have been compromised in any number of ways, ranging from the minor to the substantial. The need to, and benefit from, restoring such buildings to their former visual appearances and integrity is fundamental to inspire the appropriate type of new development that Cotati deserves. The buildings identified on pages 1:9 and 1:10 comprise Cotati's overall collection of such important resources. Within the plan boundaries, there are at least 8 such buildings that need preservation and/or restoration attention. Some of these buildings are found along the Historic Core's Old Redwood Highway frontage. Their renewal will generate a sense of pride and identity that the citizens of Cotati clearly desire.

The objectives set forth above would be achieved in practice through the standards set forth in the Implementation section of the DSP. In particular, the DSP Regulating Plan identifies 5 districts that would be applied within the plan area. One of these districts is the Historic Core (HC), which encompasses many of the identified historic resources, and is defined in the DSP as follows:

Historic Core (HC). The Historic Core district includes the portions of the Cotati downtown located south of La Plaza along both sides of Old Redwood Highway to the southern plan boundary. This area is intended to maintain its smaller scale, pedestrian orientation, with building facades located primarily at the back of the public sidewalk. The historic character of existing buildings is to be preserved, and new buildings are to be designed to be compatible with the historic character. Allowable land uses include ground floor commercial facing Old Redwood Highway. Offices and residential uses may be permitted above or on the ground floor on other streets as shown on the Regulating Plan and consistent with the City of Cotati LUC. Façade renovation and/or restoration is encouraged. The HC district is subject to the applicable Historic Core regulations of the City's LUC.

In addition to the overarching goals expressed in the zone designation, the placement of buildings on lots, parking placements, and building profiles and types are designed to be compatible with the historic pattern. Styles allowed in the design of buildings are drawn from the mix of existing architectural styles in the area.

4.4.4 Methodology

The Origer & Associates report (Origer report) on archaeological and historical resources prepared for the City of Cotati, which includes the DSP area, was consulted. The report is based on review of existing literature (see Section 4.4.8). Each of the buildings listed in Table 4.4-1 was located and compared to the illustrative diagram of the DSP to determine if any historic structures would be impacted by development under the DSP. None of them were.

4.4.5 Significance Thresholds

The project would have a significant impact on cultural and paleontological resources if it would:

- a. Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines §15064.5. Specifically, substantial adverse

changes include physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the historical resource would be materially impaired.

- b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5.
- c. Directly or indirectly destroy a unique paleontological resource or site.
- d. Disturb any human remains, including those interred outside of formal cemeteries.

4.4.6 Impacts and Mitigation Measures

Less Than Significant Impacts

The Initial Study determined that the project would not have any significant effects upon paleontological resources (threshold c). Paleontological resources have not been found in the area.

Significant Impacts

Development of the DSP could result in two significant impacts to cultural resources, as described below.

Impact CULT-1: Implementation of the DSP may result in the removal or alteration of buildings that have the potential to be historic resources, or may result in development that may be incompatible with adjacent historic structures (threshold a).

The Downtown area is the historical center of the City of Cotati. The DSP area contains one structure listed on the California Register, one structure potentially eligible for the California Register, and a number of parcels identified by the La Plaza Specific Plan as containing potentially historic structures. As indicated above, the DSP is generally protective of historic resources. However, development may still be proposed that could adversely affect historic resources. In addition, there are a number of buildings dating 45 years or older which have not been evaluated for their significance and, over the life of the plan, additional buildings may reach the 50 year mark and merit review. Removal or substantial alteration of structures determined to be significant historic resources, without proper mitigation, would constitute a significant impact.

Mitigation CULT-1a, buildings over 45 years in age: If buildings over 45 years in age are proposed for alteration or demolition, a professional historian shall evaluate whether the building is a significant historic resource under CEQA standards. If the professional determines the building is a significant historic resource, it shall make recommendations for appropriate mitigation measures within the CEQA Guidelines and The Secretary of the Interior's Standards for the Treatment of Historic Properties With Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (Standards). The 45 year threshold applies from the date of inventory, and the buildings studied will therefore change over time. For example, at the time of this writing (2008), buildings constructed prior to 1963 are considered potentially important. However, by buildout of the plan (estimated to occur in the year 2025), buildings constructed prior to 1980 will need to be considered.

Mitigation CULT-1b, historic buildings or building additions: Proponents shall meet with the Historical Society and City architectural review staff or consultant to discuss and address items such as size, bulk, scale, massing, and exterior design elements and other mitigation measures to reduce the impact to the historic resource to the extent feasible. All window framing on wood-sided historic buildings shall be wood, not metal. Wood-sided historic buildings shall be maintained with a wood exterior. The slope of each hipped or gabled roof on all new buildings or additions shall be compatible with the slope on existing buildings.

Mitigation CULT-1c, proposed renovations of historic structures: Renovations to existing historic structures shall be designed to enhance their function, safety and longevity. Proposed renovations of all buildings identified as significant shall use durable, State Historic Building Code compliant materials that fit the period of construction (late 19th to mid-20th century) and architectural character of the existing buildings. All renovations proposed for buildings fifty years of age or older shall use the State Historic Building Code instead of the Uniform Building Code.

Mitigation CULT-1d, proposed demolitions: Demolition of historic buildings will be allowed only after a recordation according to Historic American Building Survey (HABS) standards has been completed. Copies of the HABS recordation for each building shall be maintained in the local public library, City of Cotati Planning Division, and at the Sonoma State University Information Center. These federal recordation standards include large-format photography and measured architectural drawings, along with a professionally prepared historic descriptive text. The HABS requirements are provided at <http://www.cr.nps.gov/habshaer/habs/guidelines/arch-index.htm>. No demolition permits will be issued by the City until the HABS recordation has been completed.

Significance After Mitigation: Although unlikely, it is possible that the DSP would allow demolition or extensive alteration of structures eligible for the California or National Register of Historic Places, or places otherwise considered important under CEQA criteria. Not all structures within the DSP have been evaluated for historical significance, so it would be premature to assume that recordation alone (Mitigation Measure CULT-1d) would adequately mitigate the loss of such structures. Until the buildings within the DSP have been evaluated for historical significance, and the particular values of those buildings are known, it must be concluded that demolition could potentially cause significant and unavoidable impacts to historic resources as a result of the DSP.

Impact CULT-2: New development has the potential to unearth previously undiscovered resources of archaeological significance within developed and undeveloped portions of the planning area, including human remains (thresholds c and d).

Based on evidence presented in the Origer report, there is the potential for archaeological resources in the planning area. There are no known archaeological sites within the planning area, but two previously identified sites about the area. Much of the planning area is currently developed, surfaced, or has otherwise been disturbed. This condition limits opportunities for surface observation of resources and reduces the likelihood of finding intact resources. Nevertheless, it is possible that some resources remain in the planning area.

Mitigation CULT-2: Permits for projects that require excavation or grading shall require that any discovery of archaeological resources will cause the cessation of construction and the use of an archaeologist to assess and appropriately protect those resources. If the archaeologist determines that the archaeological resource is a unique archaeological resource, impacts to the resource shall be avoided or mitigated in accordance with standards under Public Resources Code section 21083.2. If the archaeologist determines that the archaeological resource is a significant resource, impacts to the resource shall be avoided or mitigated in accordance with CEQA Guidelines section 15126.4 (b). If human remains are encountered on the property, all applicable legal requirements shall be followed, including, but not limited to, Public Resources Code sections 5097-5097.6, Health & Safety Code section 7050.5 and CEQA Guidelines section 15064.5 and 15126.4. The Sonoma County Coroner's Office shall be contacted within 24 hours of the find, and all work should be halted until a clearance is given by that office and any other involved agencies. Archaeological resource data and artifacts collected within the planning area shall be permanently curated at a repository with facilities for permanent storage and providing access for scholarly researchers.

Significance after Mitigation: Implementation of the mitigation measure set forth above will reduce impacts to a less than significant level.

4.4.7 Cumulative Impacts

Implementation of the DSP could make a cumulatively considerable contribution to a significant cumulative cultural impact in the region.

The DSP's impacts are less than significant with regards to archaeological resources and the project does not result in a significant cumulative impact. Specifically, the impact of the project on archaeological resources will not make a cumulatively considerable contribution to the cumulative impact. Cumulative impacts to pre-historic (i.e., archaeological) resources from the project are fully mitigated through resources recovery and curation. Therefore, the DSP's contribution to cumulative impacts to archaeological resources would not be considerable.

However, the DSP's project specific impacts are significant and unavoidable with regards to historic resources. Therefore, the project in combination with other development in the region does result in a significant and unavoidable cumulative impact. Specifically, cumulative impacts to historic resources as a result of development of the project, in conjunction with other development in the area, could potentially have significant unavoidable impacts, and therefore make a considerable contribution to regional impacts on historic resources.

4.4.8 References

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