

### 3.15 ARCHAEOLOGICAL RESOURCES

This section summarizes the historic and prehistoric archaeological resources in the project area including delineation of an archaeological Area of Potential Effect (APE) for the project; study methodology that includes discussions of the regulatory framework, prehistoric, ethnographic, and historic settings, methods used for research and field survey, and consultation with Native American groups; results of the record search, archival research, pedestrian survey, and archaeological resources findings; and identification of potential impacts from project implementation, and measures to mitigate the impacts.

Archaeological resources can include prehistoric (pre-contact) and historic (post-contact) artifacts, densities of artifacts or isolated finds. Prehistoric archaeological resources comprise physical remnants of human activities that date prior to European contact. Examples of prehistoric archaeological sites include temporary campsites, villages, lithic or other artifact scatters, hearths and/or roasting pits, bedrock mortars, cupules, or other milling features, burials, rock art that includes petroglyphs, pictographs, intaglios, and rock mosaics, and other rock features such as hunting blinds. Historic archaeological sites include objects, ruins or other physical remnants reflecting Euro-American origins. Historic archaeological sites include physical remnants of human activities that postdate European and Native American contact, but are also over 50 years old. Examples of historic archaeological sites are the remains of foundations and footings, privies and trash scatters associated with former human occupation of homesteads, farms, ranches, towns, transportation activities, and mining.

Ethnographic resources, also referred to as Traditional Cultural Properties (TCP), are also referred to in this study. They can be physical locations or materials that are of importance to Native Americans because of their religious, spiritual or traditional value. Examples of TCPs include traditional hunting, fishing, or gathering areas, sacred locations (burial sites, caves and/or rockshelters, rock art sites, springs, and mountain peaks), or specific types of native plants, minerals or rock art sites. TCPs that meet specific criteria may be eligible for listing in the National Register of Historic Places (NRHP). In addition, TCPs that meet the criteria as set forth in Executive Order 13007 can be considered sacred sites.

#### 3.15.1 Regulatory Setting

##### Federal Regulations

Section 106 of the National Historic Preservation Act (NHPA) requires that, prior to the onset of any undertaking, a federal agency, in this case the Federal Transit Administration (FTA), must take into account the effects of a project on historic properties and provide the Office of Historic Preservation (OHP) an opportunity to comment. Regulations regarding compliance to Section 106 state that although the tasks necessary to comply with Section 106 may be delegated to others, the lead federal agency is ultimately responsible for ensuring that Section 106 is fully executed.

A historic property is defined as any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places (NRHP) maintained by the Secretary of the Interior. Historic properties include artifacts, records and remains that are related to and located within such properties. They also can include properties of traditional religious and cultural importance to Indian tribes or Native Hawaiian organizations that meet NRHP criteria. Historic properties eligible for inclusion in the NRHP include both properties formally listed in accordance with regulations of the Secretary of the Interior and all other properties that meet the NRHP criteria.

Eligibility for listing on the National Register of Historic Places is determined using the following criteria:

The quality of significance in American history, architecture, archaeology, and culture is present in districts, sites, buildings, structures, and objects of State and local importance that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and,

1. that are associated with events that have made a significant contribution to the broad patterns of our history; or
2. that are associated with the lives of persons significant in our past; or
3. that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
4. that have yielded or may be likely to yield information important in prehistory or history [Code of Federal Regulations, Title 36, Part 60].

The issue of integrity must first be addressed before considering the applicable criteria when evaluating a property for eligibility to the NRHP. For a property to be eligible for listing in the NRHP, it must meet one or more criteria for significance and retain integrity. It must possess several or usually most of the seven aspects of integrity that include location, design, setting, materials, workmanship, feeling and association.

### **Federal Regulations Regarding Archaeological Sites**

Section 3(d) of the Native American Graves Protection and Repatriation Act (NAGPRA) [43 CFR 10.2 (g) (4)] of NHPA addresses the treatment of inadvertently discovered human remains, funerary items, sacred objects, or items of cultural patrimony on federal or tribal lands.

ARPA (P.L. 9695; 16 U.S.C. 470 aamm) prohibits the unauthorized damage or removal of archaeological resources located on federal or tribal lands and provides for felony penalties for serious violations and repeat offenders.

### **State Regulations**

The proposed project is subject to compliance regulations stipulated by CEQA. The lead agency for this project is the SMART District and it is responsible for complying with CEQA's requirements regarding the identification and treatment of historic and prehistoric cultural resources. CEQA stipulates that both public and private projects with financing or approval from a public agency must assess the effects of the project on cultural resources (Public Resources Code Section 21082, 21083.2 and 21084.1 and California Code of Regulations 15064.5). Cultural resources are defined as buildings, sites, humanly modified landscapes, TCPs, structures, or objects that may have historical, architectural, cultural, or scientific importance. CEQA states that if a project will have a significant effect on important cultural resources, then alternative plans or mitigation measures need to be developed. However, only significant cultural resources need to be considered in the mitigation plans.

CEQA defines significant historical resources as "resources listed or eligible for listing in the California Register of Historical Resources (CRHR)" (Public Resources Code Section 5024.1). A property may be considered 'historically significant' if it meets the following criteria for listing on the CRHR:

1. It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. It is associated with the lives of persons important to California's past;
3. 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 values; or
4. It has yielded or is likely to yield information important in prehistory or history [Public Resources Code (PRC) Section 5024.1].

## **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 PRC 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 as the authority to resolve disputes regarding disposition of such remains.

### **County Regulations**

#### **Sonoma County**

The Sonoma County Code, Article 68 § 26-68-005, provides for a Historic Combing District zoning designation. The purpose of this overlay zoning is to “protect those structures, sites and areas that are reminders of past eras, events and persons important in local, state or national history, or which provide significant examples of architectural styles of the past, or which are unique and irreplaceable assets to the county and its communities” (Ord. No. 4643, 1993).

#### **Marin County**

Disturbance of “Indian midden” is unlawful unless a permit is issued through the Department of Public Works (Marin County Code Ord. 1589 § 2, 1967). The holder of the permit is limited to a 60-day period to complete their studies (Ord. 1825 § 2, 1971).

### **3.15.2 Environmental Setting**

#### **Regional Overview**

The project area is located within two distinct prehistoric cultural areas: the San Francisco Bay Region and the North Coast Region. In the San Francisco Bay Region the project area is most closely associated with the North Bay sub-region (Moratto, 1984). Three sub-areas are identified within the North Coast Region of California, the Northwest Coast, Eel River and the Russian River drainage, the latter being directly applicable to the proposed project. These areas are comprised of distinct cultures with at least 33 ethnographic dialects representing five major North American language families including Athabaskan, Algonkin, Hokan, Pentian, and Yukian (Shipley, 1978).

The project corridor passes through several distinctive ethnographic territories. Three main Native American groups inhabit these areas: the Pomo, Wappo and Miwok. The Pomo inhabited an area along the north-central coast of California. Some Southern Pomo village sites are located near the project corridor. One is close to an extinct lake and marsh on the southeast side of Healdsburg; another village site is north of Cloverdale; and three more sites are present south of Cloverdale (McLendon and Oswald, 1978). The project corridor also passes through what was once territory of the Western Wappo. They occupied the land between Cobb Mountain, Mt. St. Helena and Geyserville. Two village sites that are near the project area are Malalachahli and Gayechin near Lytton. Coast Miwok once inhabited the region along the railroad corridor. Coast Miwok territory encompassed the area along the coast and inland between Duncan’s Point north of Bodega Bay, southward to San Pablo Bay in Sonoma and Marin counties. Their territory extended as far inland as the Napa River. Various Coast Miwok villages were located near the railroad route. Near Cotati, three villages existed, one giving Cotati its name. Six villages were located south of Cotati to Petaluma.

The NWP railroad played a dominant role in the historic influence of the area. The NWP is an amalgam of 42 separate lines constructed between 1864 and the early twentieth century, with the main line that extends through the project area, running between Tiburon and Eureka. Several stations used by the NWP still exist along the rail corridor and contribute to the overall historic integrity of this segment of the NWP.

### **Archaeological Resources in the Project Study Area**

A review of archeological site records and survey reports at the NWIC revealed 357 previous studies within ¼ mile of the project corridor extending from Cloverdale to Larkspur. The record search revealed 28 prehistoric sites, 16 historical sites and four sites with prehistoric and historic components previously recorded within ¼ mile of the railroad tracks that comprise the 70-mile project corridor. During the subsequent archaeological pedestrian survey completed by project team archaeologists, 18 new sites were identified, including one prehistoric site, 16 historic archaeological sites and one site with historic and possible prehistoric components. Of all of these sites, 23 sites are within the railroad right-of-way and have the potential for impacts from project-related ground disturbances. Five more archaeological sites are located outside the right-of-way, but within 100 feet of the railroad tracks. Because their boundaries are not well defined, they also have the potential for impacts from the proposed project. None of these sites have been previously evaluated, and they would require evaluation on a case-by-case basis.

#### **3.15.3 Significance Criteria**

In accordance with CEQA guidelines, a project would create a significant impact on archaeological resources if it causes a substantial adverse change in the significance of an archaeological resource, or if it disturbs any human remains, including interments outside former cemeteries.

Significant impacts are those that diminish the integrity, research potential or other characteristics that make a resource significant or important. Adverse but not significant impacts are those that alter the characteristics of a resource but do not diminish the resource's significance, such as the removal of a small, disturbed portion of an archaeological site. Adverse but not significant impacts also include impacts on non-significant resources and temporary impacts.

Significant impacts on archaeological sites that are listed or determined to be eligible for listing on the NRHP or CRHR require mitigation. Potential mitigation measures include site avoidance, site capping, integration of the site into a recreation space, or data recovery excavations.

#### **3.15.4 Impact Assessment Methodology**

In consultation with the State Historic Preservation Officer (SHPO), the archaeological APE for the proposed project was defined as the physical footprint of the approximately 70-mile rail corridor right-of-way, and the proposed station sites and alternative maintenance facility sites or other locations slated for ground disturbances. The archaeological APE is the boundary of the railroad right-of-way corridor and any locations where there are plans for proposed station sites, construction staging areas or other areas with the potential for ground disturbance. The effects on archaeological resources located along the proposed bicycle/pedestrian pathway and associated structure are also considered in this study. Although much of the proposed bicycle/pedestrian pathway is located within the railroad right-of-way, the bicycle/pedestrian pathway partially extends outside the railroad corridor. The railroad corridor is not consistently the same width throughout the project area and as such, the APE corresponds to these fluctuations in the corridor. Generally, the APE extends approximately 30-40 feet on either side of the centerline of the tracks.

Various research and field methods were employed throughout this project. Record searches were conducted for historical background information at several locations. The Northwest Information Center (NWIC) of the California Historical Resources Information System (CHRIS) at Sonoma State University, the California Native American Heritage Commission and local historical societies were contacted regarding the proposed project. Additionally, archaeological and historical field methods were used during survey and recordation of cultural resources within the project area; they are detailed below.

Prehistoric sites in this area range from bedrock mortars to dense middens and historic archaeological sites vary from single concrete foundation remnants to privies. Two previously recorded prehistoric sites and two historic sites are located within the NWP railroad right-of-way. Seven other sites have been

recorded outside the railroad right-of-way, but within 100 feet of the railroad track centerline. The boundaries of these sites have not been defined through archaeological testing, so it is plausible that they could extend into the right-of-way.

### **Native American Consultation**

As part of the consultation process with Native American organizations and individuals, the Native American Heritage Commission (NAHC) was contacted with a request for information about sacred lands that may be located within the proposed project area. A search of the Sacred Lands files housed at the NAHC did not result in the identification of any sacred lands within the APE. The NAHC provided a list of local groups and individuals to contact for further information regarding local knowledge of sacred lands. Certified letters were sent to each of the nine groups on the list, including the Cloverdale Rancheria of Pomo Indians, Dawn Getchell, Dry Creek Rancheria of Pomo Indians, Grant Smith, The Federated Indians of Graton Rancheria, Lytton Band of Pomo Indians, Mishewal-Wappo Tribe of Alexander Valley, Stewarts Point Rancheria, and Ya-Ka-Ama.

Two Native American groups supplied written responses. The Lytton Rancheria indicated that they have no information on sacred lands or sites, but they requested that the project team update them on new discoveries. The Stewarts Point Rancheria indicated that the project area is outside their tribal lands.

Consultation with the Cloverdale Rancheria of Pomo Indians identified one TCP. The tribal representatives stated that the traditional lands of their former rancheria are adjacent to the railroad right-of-way. Phone conversations and a formal meeting with the Cloverdale Rancheria helped to identify areas of concern for that group. They provided information regarding an area they consider as sensitive sacred lands. The area generally extends from just north of the Mendocino/Sonoma county line south to Dry Creek. However, the Cloverdale Rancheria property is next to the rail corridor, just south of Cloverdale. The Cloverdale Rancheria requested notification if any new construction takes place near that location. They also requested that Native American monitors be present for any subsurface work within their sacred lands.

Follow-up phone calls were conducted to each Native American group or individual contacted previously by letter, plus additional calls were made to contacts from the 1999 Native American consultation effort.

### **Field Investigations**

Due to the nature of the project area, a long linear corridor, previous archaeological surveys have been performed throughout portions of the corridor. The pedestrian field survey was completed in areas not previously surveyed and in areas not surveyed more recently than ten years ago. The field surveys used transects intervals of 20 meters unless prohibited by lack of access, vegetation or safety. Each proposed station and maintenance facility location was also surveyed for archaeological resources.

As described in the environmental section, 18 new archaeological sites, comprising one prehistoric and 16 historical archaeological sites, and one site with historical and prehistoric components, were identified during the archaeological field survey.

#### **3.15.5 Impact Summary**

The proposed project has the potential to impact important archaeological sites. Presently, only one site was evaluated and determined to be significant. However, the site was later reportedly destroyed. Archaeological testing would determine if intact portions of the site still exist. None of the remaining 23 archaeological sites within the railroad APE, or the five sites directly outside the APE, has been evaluated and their boundaries are not well defined. As such, all require significance assessments on a case-by-case basis. Based on relevant information, 12 recorded historic railroad related archaeological features, all described as footings, do not appear to be significant and would not require mitigation. Three additional historic foundation footings would require evaluation, as would three additional archaeological sites to determine NRHP/CRHR significance. Ten more archaeological sites have not

been previously evaluated, but based on information provided in survey reports and site records they are likely to be determined significant. In total, 16 of 28 sites would require evaluation, either through additional archival research, archaeological excavation, or a combination of both.

Additional sites, presently depicted outside the railroad APE, with boundaries defined through surface survey alone, may also extend into the APE. Extended Phase 1 testing would be required for each of these sites to determine the true extent of their boundaries. After Phase 1 testing has been completed, efforts should be made to avoid sites that extend into the APE. If avoidance is not feasible, then archaeological sites that have the potential to be impacted by ground disturbances related to the proposed project would require NRHP and CRHR evaluation to determine their significance.

Significant impacts on archaeological sites that are listed, or are eligible for listing, on the NRHP or CRHR would require mitigation. However, site evaluations will need to be completed prior to determining NRHP or CRHP eligibility. Potential mitigation measures include site avoidance, site capping, integration of the site into a recreation space, or data recovery excavations. Other mitigation measures include preparing a plan, in consultation with SHPO and Native American groups, to identify, evaluate and determine the potential impacts of the proposed project on a resource. Implementation of the prescribed mitigation measures would reduce potential impacts to archaeological sites to less than significant levels.

In general, any ground disturbing project has the potential for the permanent destruction of intact archaeological sites. Because archaeological sites are remnants of communities and cultures from the past, once lost they can never be recovered. However, because these sites are generally buried or not clearly visible, projects such as the proposed project are able to obtain valuable information regarding the people or cultures that inhabited or used the site being impacted. As a result, the proposed project may result in the permanent in-place loss of some archaeological sites, but at the same time add to the collective knowledge about the people and cultures that created the site.

### 3.15.6 Impacts and Mitigation Measures

#### Construction-Related Impacts

**Impact AR-1: Several locations exist within the project corridor that have a high probability to contain historic or prehistoric archaeological deposits. (Significant mitigable)**

These sites are discussed below.

- Cloverdale Area: Because of the cultural sensitivity for archaeological and ethnographic sites in the Cloverdale area, ground disturbances related to the proposed parking lot expansion and proposed bicycle/pedestrian pathway next to the Cloverdale Station could impact known or unknown prehistoric archaeological resources. Because this area is considered traditional lands for the Cloverdale Rancheria of Pomo Indians, they have requested notification of work near the station, and they would like to serve as Native American monitors for projects occurring between Cloverdale and Healdsburg.
- Cloverdale Maintenance Site: One prehistoric archaeological site is recorded adjacent to the eastern boundary of the Cloverdale maintenance site. The close proximity of this site to the maintenance site alternative suggests there is potential for impacts. In addition, if this maintenance site alternative is selected then the archaeological site is likely to be impacted by trackwork north of Cloverdale.
- Healdsburg Station: Given the ethnographic information and the location of the project area at the Historic Healdsburg Railroad Depot, there is a high probability that buried prehistoric or historic archaeological deposits exist in the project area.
- Santa Rosa Depot: No prehistoric archaeological sites or TCPs have been identified in the location of the Santa Rosa Depot; however, there is potential for presently unidentified subsurface prehistoric or historical archaeological sites or features to be impacted by ground disturbances related to the proposed parking lot expansion, proposed bicycle/pedestrian pathway and track and depot improvements.

- Petaluma Area: Historic archaeological deposits associated with the former Crown Station whistle stop could be impacted by construction in this location.
- Petaluma Station: Modifications to the track and platform construction at the Petaluma Station could impact presently unidentified historical archaeological deposits, and Depression Era hobo refuse may also be located in the area (Newland and Esser, 1999:4).
- Novato North Station: It is possible that subsurface deposits, not visible on the ground surface, are present at the Novato North Station site and could be disturbed during construction of the station.
- Novato South Station: It is possible that subsurface deposits, not visible on the ground surface, are present at the Novato South Station site and could be disturbed during construction of the station. The station location is in a culturally sensitive area.
- San Rafael Area: Construction activities associated with the San Rafael Station could disturb unknown and potentially important prehistoric and/or historic archaeological resources. Downtown San Rafael is a culturally sensitive area.
- Construction of the proposed bicycle/pedestrian pathway and associated fences and/or structures may impact known and unknown sites within and near the project APE. Potential impacts could occur in areas where archaeological sites are near the railroad right-of-way, and ground-disturbing activities are proposed. There is the potential for impacts to these sites or to previously undiscovered cultural materials in these areas.

**Mitigation Measure AR-1:** Because of the high probability for the presence of historic or prehistoric artifact deposits, an Extended Phase I archaeological study is recommended at these sites in locations where ground disturbances are planned. If an archaeological site is discovered, additional fieldwork (Phase II testing) may be required to establish site boundaries and determine each site's eligibility for listing on the NRHP. If a site is determined to be eligible, consultation shall be initiated with the SHPO and other appropriate consulting parties to either avoid the site or to develop a data recovery plan.

Extended Phase I archaeological testing is generally comprised of a series of systematically placed vertical holes that are slightly wider than the width of a shovel blade. Shovel test pits are typically excavated to sterile subsoil or the maximum practical depth to which soil material can be removed by shovel, usually just over a meter. During excavation, care is taken that soil strata are recognized and artifacts from each stratum are bagged separately. A profile is then produced and soils are classified by type and Munsell colors.

**Impact AR-2: Subsurface historic archaeological deposits associated with the Coast Miwok ethnographic village north of Cotati could be impacted by construction. (Significant mitigable)**

**Mitigation Measure AR-2:** Archaeological and Native American monitoring is recommended in this area because subsurface historic and possibly prehistoric archaeological deposits could be impacted by construction.

**Impact AR-3: Ground disturbing construction activities could adversely affect unknown potentially important subsurface cultural materials in the vicinity of the Marin Civic Center Station. (Significant mitigable)**

**Mitigation Measure AR-3:** 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.

**Impact AR-4: Eleven culturally sensitive historic and prehistoric sites have been identified in the area that extends north from the Marin/Sonoma county line to the Haystack Bridge south of Petaluma. (Significant mitigable)**

Sites near the railroad tracks have been identified that have the potential for being impacted by trackwork.

**Mitigation Measure AR-4:** Trackwork shall be avoided or undertaken in a manner to avoid ground disturbance beyond the current track limits (e.g., by undertaking construction from the existing track) in the most culturally sensitive railroad segments. The Federated Indians of Graton Rancheria have asked that any archaeological site identified within those boundaries be depicted as an “environmentally sensitive area” on railroad maps. Furthermore, maintenance trucks shall avoid driving through this area until boundary definition, evaluation and site capping is completed at the site within the railroad right-of-way. If it is not possible to avoid impacts along this railroad segment, boundary definition would also be warranted at each site to determine if trackwork has the potential to impact the sites.

Avoidance of all ground disturbances that could create impacts is recommended at the following sites: two historic foundations; a buried concrete wall within the railroad right-of-way; a prehistoric site north of Pennegrove; and a prehistoric site south of San Rafael at Simms. If avoidance is not feasible, then the sites would require evaluation for NRHP/CRHR eligibility.

**Impact AR-5: Any replacement bridgework has the potential to disturb potentially significant archaeological resources since prehistoric and historic archaeological sites are often located on stream banks or near the confluence of streams. (Significant mitigable)**

Of note are bridges and trestles to be replaced from the Marin/Sonoma county line northward to the Petaluma Haystack Bridge, including approximately five bridges and trestles between MP 31 to MP 37. This area is culturally sensitive because a cluster of archaeological sites is present in the vicinity. Other areas of specific cultural sensitivity include bridgework north of MP 85 in Cloverdale, a trestle north of Chianti, and a ballast-deck trestle between MP 43 and MP 44 north of Pennegrove.

**Mitigation Measure AR-5:** Of the five bridges and trestles located between MP 31 to MP 37, the open deck trestle between MP 35 and MP 36 should be avoided. If the trestle needs to be replaced, then archaeological site determination (Extended Phase I testing), Phase II eligibility testing, and possible data recovery would be required. The remaining four bridges would require monitoring by a qualified archaeologist and a Native American monitor. Archaeological sites near bridges located at MP 85 and between MP 43 to MP 44 would require boundary definition. If the sites would be impacted by bridgework, then evaluation would be required prior to bridge removals.

**Impact AR-6: Site preparation and use of some of the proposed pre-construction staging areas could disturb unknown and potentially significant cultural resources. (Significant mitigable)**

**Mitigation Measure AR-6:** If ground disturbances are planned and staging areas cannot be avoided, an archaeologist shall be present for all grading or other ground disturbing activities planned in the staging area. In the vicinity of the staging areas near Ignacio, if ground disturbances are planned, an archaeologist and Native American monitor should be present for all grading or other ground disturbing activities planned in the staging area.

### **Cumulative Impacts**

Cumulative impacts result from incremental actions that are collectively significant to a resource. If a project results in development features or changes to existing environmental conditions that are incompatible with archaeological resources that exist within the vicinity of the project site, a potentially significant cumulative impact could result.

This study reviewed the cumulative impacts of 29 residential and commercial developments near the project corridor between Windsor and Larkspur. Although none of these present and future

developments would impact known prehistoric or historical archaeological sites, three are located in areas with increased cultural sensitivity:

- Albertsons Grocery Store, Ignacio;
- Marin Business Center, Novato; and
- Proposed Food and Wine Center, Santa Rosa.

The Albertsons Grocery Store project is presently under construction in an area of cultural sensitivity for prehistoric archaeological resources. Ground disturbances associated with the grading and excavation for the building and parking lot could impact potential archaeological sites. The development is near the project right-of-way and proposed Ignacio construction staging parcel where impacts may result from grading for the staging area, proposed bicycle/pedestrian pathway, and continued maintenance of the railroad track and its components. One archaeological site has been identified within 500 feet of the railroad tracks and other archaeological sites are also clustered in this general area.

The Marin Business Center was completed in 2000. Nearby, proposed project plans include the Novato North Station. Railroad-related impacts include station development, platform, park-and-ride spaces, and bicycle and pedestrian access. One archaeological site is nearby and other presently unidentified sites may be present in the area.

Both of these commercial projects are in the general vicinity of one or more identified prehistoric sites. These types of projects may attract additional commercial and residential development that will increase the chances of impacting potential archaeological sites.

The proposed Food and Wine Center and Mixed-Use Development would be located within the Santa Rosa Railroad Square District. This project could impact potential historical archaeological sites during ground disturbances associated with construction. The proposed project also proposes work at the Santa Rosa Railroad Square Station; work includes renovations at the extant Historic Depot at Railroad Square and plans for two platforms, a double track and new parking spaces. It is likely that historic building foundations, trash dumps and other historic artifacts exist in this area.

These three developments, in combination with the proposed project, could result in cumulative impacts on prehistoric or historic archaeological sites. However, the mitigation measures identified for project impacts would ensure that the proposed project's contribution to any cumulative impact would be reduced to less than significant.