

6.6 Cultural Resources

6.6.1 Introduction

This section discusses impacts under CEQA that would result from construction and operation of CEQA Alternatives.

6.6.2 Regulatory Setting

6.6.2.1 State

California Environmental Quality Act and Guidelines

CEQA uses the term *historical resource* to describe buildings, sites, structures, objects, or districts that may have historical, pre-historical, architectural, archaeological, cultural, or scientific importance.

CEQA states that if implementation of a project would result in significant effects on historical resources, then alternative plans or mitigation measures must be considered; however, only significant historical resources need to be addressed (14 California Code of Regulations (CCR) Sections 15064.5, 15126.4). Therefore, before impacts and mitigation measures can be identified, the significance of historical resources must be determined.

The State CEQA Guidelines define three ways that a property may qualify as a historical resource for the purposes of CEQA review.

1. The resource is listed in or determined eligible for listing in the California Register of Historical Resources (CRHR).
2. The resource is included in a local register of historical resources, as defined in Section 5020.1(k) of the California Public Resources Code (PRC) or identified as significant in a historical resource survey meeting the requirements of Section 5024.1(g) of the PRC, unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
3. The lead agency determines the resource to be significant, as supported by substantial evidence in light of the whole record (14 CCR Section 15064.5(a)).

Each of these ways of qualifying as a historical resource for the purpose of CEQA is related to the eligibility criteria for inclusion in the CRHR (PRC Sections 5020.1(k), 5024.1, 5024.1(g)). A historical resource may be eligible for inclusion in the CRHR if it meets any of the following conditions.

1. The resource is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.

2. The resource is associated with the lives of persons important in California's past.
3. The resource 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.
4. The resource has yielded, or may be likely to yield, information important in prehistory or history.

Properties that are listed in or eligible for listing in the National Register of Historic Places are considered eligible for listing in the CRHR and thus are significant historical resources for the purpose of CEQA (PRC Section 5024.1(d)(1)).

According to CEQA, a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant impact on the environment (14 CCR Section 15064.5(b)). Under CEQA, a substantial adverse change in the significance of a resource means the 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. Actions that would materially impair the significance of a historical resource are any actions that would demolish or adversely alter the physical characteristics that convey the property's historical significance and qualify it for inclusion in the CRHR or in a local register or survey that meets the requirements of PRC Sections 5020.1(k) and 5024.1(g).

California Public Resources Code

PRC Section 5024.1, which established the CRHR, protects historical resources. PRC Section 5024 requires state agencies to identify and protect state-owned resources that meet National Register of Historic Places listing criteria.

PRC Section 5097.5 prohibits removing, destroying, injuring, or defacing any vertebrate paleontological site, including fossilized footprints, or any other paleontological feature, as well as items of archaeological and historic interest that are situated on public lands, except with permission of the public agency with jurisdiction.

California Health and Safety Code—Treatment of Human Remains

Under Section 8100 of the California Health and Safety Code, six or more human burials at one location constitute a cemetery. Disturbance of Native American cemeteries is a felony (Health and Safety Code Section 7052).

Section 7050.5 of the Health and Safety Code requires that construction or excavation be stopped in the vicinity of discovered human remains until the county coroner can determine whether the remains are those of a Native American. If the remains are determined to be Native American, the coroner must then contact the Native American Heritage Commission, which has jurisdiction pursuant to PRC Section 5097.

When human remains are discovered or recognized in any location other than a dedicated cemetery, no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains may take place until the county coroner has been informed and has determined that no investigation of the cause of death is required, and, if the remains are of Native American origin, either:

- The descendants of the deceased Native American(s) have made a recommendation to the landowner or the person responsible for the excavation work for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in PRC Section 5097.98; or
- The Native American Heritage Commission was unable to identify a descendant or the descendant failed to make a recommendation within 24 hours after being notified by the commission.

6.6.2.2 Local

City of San Jose

The Land Use and Transportation chapter of *Envision San Jose 2040 General Plan* contains several goals and policies related to historical resources (City of San Jose 2011).

Goal LU-13: Landmarks and Districts. Preserve and enhance historic landmarks and districts in order to promote a greater sense of historic awareness and community identity and contribute toward a sense of place.

- **Policy LU-13.1.** Preserve the integrity and fabric of candidate or designated Historic Districts.
- **Policy LU-13.2.** Preserve candidate or designated landmark buildings, structures and historic objects, with first priority given to preserving and rehabilitating them for their historic use, second to preserving and rehabilitating them for a new use, or third to rehabilitation and relocation on-site. If the City concurs that no other option is feasible, candidate or designated landmark structures should be rehabilitated and relocated to a new site in an appropriate setting.
- **Policy LU-13.3.** For landmark structures located within new development areas, incorporate the landmark structures within the new development as a means to create a sense of place, contribute to a vibrant economy, provide a connection to the past, and make more attractive employment, shopping, and residential areas.

Goal LU-14: Historic Structures of Lesser Significance. Preserve and enhance historic structures of lesser significance (i.e., Structures of Merit, Identified Structures, and particularly Historic Conservation Areas) as appropriate, so that they remain as a representation of San José's past and contribute to a positive identity for the City's future.

- **Policy LU-14.1.** Preserve the integrity and enhance the fabric of areas or neighborhoods with a cohesive historic character as a means to maintain a connection between the various structures in the area.

- **Policy LU-14.3.** Discourage demolition of any building or structure listed on or eligible for the Historic Resources Inventory as a Structure of Merit by pursuing the alternatives of rehabilitation, re-use on the subject site, and/or relocation of the resource.

Goal LU-16: Sustainable Practices. Preserve, conserve, and/or rehabilitate historic structures as a means to achieve the City of San José’s environmental, economic, and fiscal sustainability goals.

In addition, three of San Jose’s City ordinances make reference to historic resources. Title 2, Chapter 2.08, Part 26 establishes the Historic Landmarks Commission. Title 13, Chapter 13.48 discusses the goals of historic preservation; outlines the procedures for historic designation; prohibits alteration, demolition, or maintenance without a permit; and requires a public hearing should a historic resource be proposed for demolition. Title 17 references the application of the State Historical Building Code.

City of Santa Clara

The *Santa Clara 2010–2035 General Plan* (Chapter 5, Goals and Policies), provides goals and policies for historic preservation, areas of historic sensitivity, and archaeological and cultural resources (City of Santa Clara 2010).

Historic Preservation Goals

5.6.1-G1. Preservation of historic resources and neighborhoods.

5.6.1-G2. Public awareness of the City’s historic preservation programs.

5.6.1-G3. Changes and maintenance of historic resources that retain the integrity of the property and its historic value.

Historic Preservation Policies

5.6.1-P1. Discourage the demolition or inappropriate alterations of historic buildings and ensure the protection of historic resources through the continued enforcement of codes and design guidelines.

5.6.1-P2. Protect the historic integrity of designated historic properties and encourage adaptive reuse when necessary to promote preservation.

5.6.1-P3. Protect historic resources from demolition, inappropriate alterations and incompatible development.

5.6.1-P4. Use the City’s Criteria for Local Significance as the basis for designating historic resources and review proposed changes to these resources for consistency with the Secretary of Interior Standards and California Historic Building Code.

5.6.1-P5. Promote the use of the preservation standards outlined in the current Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings, or properties listed, or eligible for listing, on the City’s Architecturally or Historically Significant Properties List.

5.6.1-P6. Promote an active program to identify, interpret and designate the City's historic properties, including the evaluation of resources over 50 years old to determine eligibility for the City's Architecturally or Historically Significant Properties list.

5.6.1-P7. Encourage programs that provide incentives and leverage public and private resources, to promote historic preservation, maintenance and adaptive reuse by property owners, such as Mills Act Contracts for tax benefits, tax credits, and zero or low-interest loans for income-qualified residents.

5.6.1-P8. Coordinate historic preservation efforts with other agencies and organizations, including the Chamber of Commerce, Santa Clara County Historical and Genealogical Society, and other historical organizations.

5.6.1-P9. Facilitate public outreach, education and information regarding historic preservation through the City's Historical and Landmarks Commission.

5.6.1-P10. Update and maintain the City's Architecturally or Historically Significant Properties List, and associated State Department of Parks and Recreation forms, as an Appendix to the General Plan.

Areas of Historic Sensitivity Goals and Policies

The area immediately surrounding historic resources contributes to the setting for the resource. It is important to review any changes in these areas with that in mind. The following goals and policies provide direction for all properties within a radius of 100 feet to City, State, or federally listed historic resources in the City.

Areas of Historic Sensitivity Goals

5.6.2-G1. New development that is compatible with nearby historic resources.

5.6.2-G2. Preservation of the neighborhood context for historic resources.

Areas of Historic Sensitivity Policies

5.6.2-P1. Evaluate any proposed changes to properties within 100 feet of historic resources on the City's Architecturally or Historically Significant Properties List for potential negative effects on the historic integrity of the resource or its historic context.

5.6.2-P2. Require that changes to properties that contribute to the context of a historic resource are compatible in scale, materials, design, height, mass and use with the historic resource or its context.

5.6.2-P3. Strengthen the character and historic context of the Old Quad historic neighborhood through streetscape design, amenities and street tree planting.

5.6.2-P4. Work with Santa Clara University to improve compatibility between University-owned properties and nearby historic resources.

5.6.2-P5. Work with off-campus housing providers to ensure that maintenance and operational provisions that protect nearby historic resources are implemented.

5.6.2-P6. Provide notification and information to owners, and developers of properties near historic resources in order to increase awareness of potential constraints on new development and/or uses.

Archaeological and Cultural Resources Goals and Policies

The City of Santa Clara is rich with archaeological and paleontological resources. These resources include the Santa Clara Mission, Native American burial grounds, the Berryessa Adobe and many others. The following Goals and Policies ensure that these resources are protected, now and into the future, and that appropriate mitigation measures to unforeseen impacts are enforced.

Archaeological and Cultural Resources Goals

5.6.3-G1. Protection and preservation of cultural resources, as well as archaeological and paleontological sites.

5.6.3-G2. Appropriate mitigation in the event that human remains, archaeological resources or paleontological resources are discovered during construction activities.

Archaeological and Cultural Resources Policies

5.6.3-P1. Require that new development avoid or reduce potential impacts to archaeological, paleontological and cultural resources.

5.6.3-P2. Encourage salvage and preservation of scientifically valuable paleontological or archaeological materials.

5.6.3-P3. Consult with California Native American tribes prior to considering amendments to the City's General Plan.

5.6.3-P4. Require that a qualified paleontologist/archaeologist monitor all grading and/or excavation if there is a potential to affect archaeological or paleontological resources, including sites within 500 feet of natural water courses and in the Old Quad neighborhood.

5.6.3-P5. In the event that archaeological/paleontological resources are discovered, require that work be suspended until the significance of the find and recommended actions are determined by a qualified archaeologist/paleontologist.

5.6.3-P6. In the event that human remains are discovered, work with the appropriate Native American representative and follow the procedures set forth in State law.

6.6.3 CEQA Methods of Analysis

This section of the SEIS/SEIR describes the potential cultural impacts that could result from implementation of the project, as well as mitigation measures to reduce such impacts.

For a detailed discussion of the identification of the Area of Potential Effect (APE)/Area of Direct Impact, the results of the background records search, and the summary of Native American consultation, please see Section 4.5, *Cultural Resources*.

6.6.4 CEQA Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, the project would have a significant impact if it would result in any of the conditions listed below.

- Cause a substantial adverse change in the significance of a built environment resource or an archaeological resource that is a historical resource pursuant to State CEQA Guidelines Section 15064.5.
- Cause a substantial adverse change in the significance of a unique archaeological resource pursuant to PRC Section 21083.2.
- Disturb any human remains, including those interred outside of formal cemeteries, pursuant to California Health and Safety Code Section 7050.5.

6.6.5 Environmental Consequences and Mitigation Measures

This section identifies the impacts on cultural resources under CEQA, as well as mitigation measures necessary to reduce the level of potentially significant impacts.

6.6.5.1 No Build Alternative

The No Build Alternative consists of the existing transit and roadway networks and planned and programmed transportation improvements (see Chapter 2, Section 2.2.1, *NEPA No Build Alternative*, for a list of these projects) and other land development projects planned by the Cities of San Jose and Santa Clara.

The No Build Alternative projects could result in effects on cultural resources typically associated with transportation projects, such as transit, highway, bicycle and pedestrian facilities, and roadway projects, as well as land development projects. All individual projects planned under the No Build Alternative would undergo separate environmental review to identify effects on cultural resources. Review would include an analysis of impacts and identification of mitigation measures to reduce potential impacts.

6.6.5.2 BART Extension Alternative

Construction of the BART Extension including stations and associated infrastructure (ventilation facilities, systems facilities, station boxes, and trackwork including crossovers), station campuses, Newhall Maintenance Facility, and relocation of utilities could result in disturbance to cultural resources. Oversized equipment, such as cranes, bulldozers, loaders, pavement breakers, excavators, and backhoes, would be used extensively. Demolition activities would primarily occur at the four stations, two mid-tunnel ventilation facility sites, two tunnel portals, and the construction staging areas north of U.S. 101.

Impact BART Extension CUL-1: Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5

Construction

Construction of the BART Extension Alternative would not cause significant impacts on any of the 34 identified historic architectural resources (see Tables 4.5-1 through 4.5-3 in Section 4.5). BART Extension Alternative components near historical resources include Twin-Bore and Single-Bore options of tunnel alignments, stations (Alum Rock/28th Street, Downtown San Jose East and West Options, Diridon Station South and North Options, and Santa Clara), and the Newhall Maintenance Facility.

Construction noise has the potential to cause indirect effects only on historic properties that have an inherent quiet quality that is part of a property's historic character and significance (i.e., churches, parks, and National Historic Landmarks with significant outdoor use). Only one of the 29 historic properties, the Church of Five Wounds is considered to have an inherent quiet quality. Noise generated during construction of the Alum Rock/28th Street Station has the potential to result in a significant impact on the Church of Five Wounds. Mitigation measures identified in Section 5.5.13.3 include installation of a temporary noise wall or noise curtain (a flexible barrier hung from frames) (Mitigation Measure NV-CNST-C). This impact would be *less than significant after mitigation*.

There would be no indirect adverse effect on any historic property from predicted vibration or noise impacts from the construction of the BART Extension Alternative at the location of any historic property. While the impacts caused by vibration from construction of the BART Extension may exceed the FTA threshold of 0.12 inch/second peak particle velocity (PPV) for potential to cause physical damage or alteration on historic properties, the contractor would be required to maintain vibration levels of less than 0.12 inch/second PPV as measured at historic properties. Mitigation Measures NV-CNST-P through NV-CNST-R would be implemented and the impact would be *less than significant after mitigation*.

Potential impacts on historic buildings due to surface settlement during tunneling and cut-and-cover activities in the vicinity would be reduced by implementing Mitigation Measures GEO-CNST-B through GEO-CNST-D. Thus, impacts would be *less than significant*. Please see a detailed discussion in Section 4.5. None of the BART Extension components would result in substantial changes to the identified historical resources because they would not result in physical demolition, destruction, relocation, or alteration of any historical resources. Therefore, the BART Extension Alternative would result in *less-than-significant impacts* on historical resources.

Operation

Only operational noise or vibration has the potential to affect historic properties during BART operations. As explained in Section 4.5, the operational noise and vibration levels for the BART Extension Alternative would not be substantial and would not affect the historical resources. Section 4.5 also explains that station entrance portals and/or elevators and other

aboveground elements are small in scale relative to the surrounding buildings, and their massing would be consistent with the character of the surroundings and would not represent an indirect visual impact on historic properties. Therefore, operation of the BART Extension Alternative would have a *less-than-significant impact* on historical resources during operations. No mitigation is required.

Impact BART Extension CUL-2: Cause a substantial adverse change in the significance of an archaeological resource as defined in § 21083.2

Construction

Known Resources

One historic-era archaeological resource (CA-SCL-363H) was identified within the archaeological APE during the background records search; however, as described in *VTA's BART Silicon Valley—Phase II Extension Project: Finding of Effects* (JRP, ICF, and Far Western 2016) and Chapter 5, Section 5.5.6, *Cultural Resources*, the BART Extension Alternative would not affect this resource. Additional archaeological resources, both prehistoric and historic-era, are within 0.5 mile of the archaeological APE but would not be affected by the BART Extension Alternative. Impacts would be *less than significant*, and no mitigation is required.

Unknown Resources

As discussed in Section 4.5, the 2016 ARTR identified numerous locations within the APE where archaeological resources may be expected. Preconstruction archaeological testing is recommended to test the sensitive areas within the APE that may be disturbed by construction. However, many of the sensitive areas are located under existing buildings or infrastructure that would have to be removed prior to testing, are located on private property, or both. Therefore, it is not feasible to test all sensitive areas at this time.

Consequently, a Draft Programmatic Agreement (PA) has been prepared for the identification and evaluation of archaeological resources in phases prior to construction of the project, and treatment of archaeological resources and burials in the event that such resources are discovered during construction activities. The Draft PA includes an outline for an Archaeological Resources Treatment Plan (ARTP) that will be prepared. The ARTP will describe archaeological procedures, notification and consultation requirements, professional qualifications requirements, and procedures for the disposition of artifacts if any are discovered. The preparation and implementation of the Draft PA and ARTP are identified in Chapter 5, Section 5.5.6, *Cultural Resources*, as Mitigation Measure CUL-CNST-A. The Draft PA is included in Appendix D.3. Implementation of this mitigation would ensure that impacts on unknown archaeological resources are *less than significant with mitigation*.

Operation

The only operational impact that would have the potential to affect the one known archaeological historic property during BART operations would result from potential vibration impacts of the trains operating along the tracks within the tunnel. As explained in Section 4.5, operational vibration levels would be below the threshold of 90 vibration decibels (VdB); therefore, vibration from operation of the BART Extension would result in a *less-than-significant impact*, and no mitigation is required.

Impact BART Extension CUL-3: Disturb human remains, including those interred outside of formal cemeteries

Construction

No known archaeological sites having the likelihood of containing human remains were identified within the APE during the background records search.

Given the findings of the archaeological inventory (the background records/literature review) and the sensitivity assessment, it is possible that previously undiscovered archaeological resources, including human remains, are located within the APE. Mitigation Measure CUL-CNST-A would reduce this impact to a *less-than-significant* level.

Operation

Operation of the BART Extension would occur within areas previously disturbed by construction of the BART Extension; therefore, the BART Extension would not cause new damage or destruction of unknown archaeological resources that may contain human remains. There would be *no impact*, and no mitigation is required.

6.6.5.3 BART Extension with TOJD Alternative

Impact BART Extension + TOJD CUL-1: Cause a significant adverse change in the significance of a historical resource as defined in § 15064.5

Construction

VTA proposes to construct TOJD consisting of office, retail, and residential buildings as part of the BART Extension with TOJD Alternative. TOJD would occur at the four station locations (Alum Rock/28th Street, Downtown San Jose East and West Options, Diridon Station South and North Options, and Santa Clara). None of these construction activities would cause a direct substantial change to any of the 34 identified historical resources, because all development would occur outside of the historical resources' property boundaries.

Impacts related to the BART Extension Alternative would be the same as those described under Impact BART Extension CUL-1 above. There would be no significant indirect impacts on any historical resource from predicted vibration or noise from construction of the TOJD

near the location of any historical resource. Noise impacts on historical resources from construction of the TOJD would be the same as those described under Impact BART Extension CUL-1 above. As stated under Impact BART Extension CUL-1, potential impacts on historic resources resulting from construction noise and vibration would be reduced to a less-than-significant level by implementing Mitigation Measures NV-CNST-C, NV-CNST-P, NV-CNST-Q, and NV-CNST-R. Potential impacts on historic properties due to surface settlement would be reduced to a less-than-significant level by implementation of Mitigation Measures GEO-CNST-B through GEO-CNST-D. Only impacts specific to the TOJD element are described below.

Alum Rock/28th Street Station

At the Alum Rock/28th Street Station, TOJD would be more than 50 feet from the northwestern boundary of the only nearby historical resource. While the TOJD, which would include a building up to nine stories in height, would be visible from the historical resource (Five Wounds Church), it would not substantially alter the viewshed or industrial setting surrounding this historic property. The historic integrity of the historical resource would remain unchanged, and its significance would not be materially impaired. Impacts would be *less than significant*, and no mitigation is required.

Downtown San Jose Station East and West Options

The TOJD at the Downtown San Jose Station East and West Options would consist of up to 3.5-story buildings, which would be consistent in scale and height with historical resources and other modern infill construction in the area. One of these TOJDs would be adjacent to one historical resource located at 30 North 3rd Street (Map Reference E-27); however, construction would be at the rear of the historic building and would not be visible from its historic façade, which would face away from the TOJD. The remaining TOJDs would be constructed 70 feet or more away, and across well-traveled thoroughfares, from any of the identified historical resources. While visible from some nearby historical resources, the construction of the TOJD would not substantially alter any historical resource's viewshed or setting, as the setting and view at many of these locations has already been altered by the introduction of modern buildings and street amenities, or through introduction of other similar modern facilities. Therefore, none of VTA's TOJDs would materially impair the significance of any of the nearby historical resources; as such, impacts under CEQA would be *less than significant*. No mitigation is required.

Diridon Station South and North Options

Similarly, the TOJD at the Diridon Station South and North Options would not materially impair the one nearby historical resource (historic Diridon Station, Map Reference F-13). TOJDs would be a considerable distance (more than 130 feet) from any contributing element of the historical resource and approximately 50 feet from the property boundary. While the building of up to eight stories in height on the site of an extant surface parking lot may alter the view and setting of the historical resource, it would not do so in an adverse manner. The

integrity of the character-defining features of this historic rail station—those specifically related to the historical resource’s architectural design for which it was found to be historically significant (its Italian Renaissance Revival design and ornamentation as well as its contributing appurtenant features and structures such as its wall and wrought-iron fence system, tracks, passenger sheds, underpass)—would remain unchanged, and the station would still be able to convey the architectural significance that qualifies it for inclusion in the CRHR. Impacts would be *less than significant*, and no mitigation is required.

Santa Clara Station

At the Santa Clara Station, TOJD would be more than 250 feet away, and across a heavily traveled railroad corridor, from any nearby historical resource. While the construction of one or more buildings of up to eleven stories in height would alter the view and setting of a historical resource (historic Caltrain Station, Map References I-01 and I-02), the TOJD would be far enough away that it would not alter the character-defining features of the historic station or its associated buildings, which include building plan, roof, siding, doors, loading dock, windows, and signage. The historic station’s integrity and use would remain unchanged, and the resource would still be able to convey both its architectural merit and its association with early state and regional rail transportation for which it was found to be historically significant. Impacts would be *less than significant*, and no mitigation is required.

Operation

All operational impacts would be similar to those discussed under Impact BART Extension CUL-1. Operation of the BART Extension with TOJD Alternative would have a *less-than-significant impact* on historical resources during operations. No mitigation is required.

Impact BART Extension + TOJD CUL-2: Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 21083.2

Construction

All construction impacts would be similar to those discussed under Impact BART Extension CUL-2. Mitigation Measure CUL-CNST-A would reduce this impact to a *less-than-significant* level.

Operation

All operational impacts would be similar to those discussed under Impact BART Extension CUL-2. Impacts would be *less than significant*, and no mitigation is required.

Impact BART Extension + TOJD CUL-3: Disturb human remains, including those interred outside of formal cemeteries

Construction

All construction impacts would be similar to those discussed under Impact BART Extension CUL-3. Mitigation Measure CUL-CNST-A would reduce this impact to a *less-than-significant* level.

Operations

All operational impacts would be similar to those discussed under Impact BART Extension CUL-3. There would be *no impact*, and no mitigation is required.

6.6.6 CEQA Conclusion

The BART Extension Alternative and the BART Extension with TOJD Alternative have the potential to result in significant impacts on unknown archaeological resources and human remains, should they be encountered during construction activities. However, by implementing Mitigation Measure CUL-CNST-A, these impacts would be reduced to a *less-than-significant* level. Additionally, potential impacts on historic resources resulting from construction noise and vibration would be reduced to a less-than-significant level by implementing Mitigation Measures NV-CNST-C, NV-CNST-P, NV-CNST-Q, and NV-CNST-R. Potential impacts on historic properties due to surface settlement would be reduced to a less-than-significant level by implementation of Mitigation Measures GEO-CNST-B through GEO-CNST-D.

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