

Appendix 3.2-1

**Aesthetics and Visual Resources CEQA Evaluation**

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## Memorandum

<b>To:</b>	Shraddha Navalli Patil, UC Berkeley Antonio Encarnacion, NASA Andrés Estrada, NASA
<b>From:</b>	Kirsten Chapman, ICF
<b>CC:</b>	Jessica Viramontes, Project Manager, ICF Sally Zeff, Project Director, ICF Devan Atteberry, Assistant Project Manager, ICF
<b>Date:</b>	April 2026
<b>Re:</b>	<b>Berkeley Space Center at NASA Research Park – Aesthetics and Visual Resources CEQA Evaluation</b>

## Introduction

Moffett Partners, LLC (Project Proponent), a joint venture of The Regents of the University of California (UC Regents) and SKSP NRP, LLC, is proposing a master-planned mixed-use academic and research project, referred to as the Berkeley Space Center at the National Aeronautics and Space Administration (NASA) Research Park (NRP) (proposed project/proposed action).<sup>1</sup> The Project Proponent will require authorization from the UC Regents to proceed with the proposed project under the California Environmental Quality Act (CEQA), and NASA's approval to proceed following analysis consistent with the National Environmental Policy Act (NEPA). NASA is the NEPA Lead Agency for the proposed action and, as the Authority Having Jurisdiction, NASA would issue building permits and monitor applicable mitigation measures related to development and operation of the proposed project. The UC Regents is the CEQA Lead Agency for the proposed project and would provide authorization before the proposed action is submitted for NASA's approval.<sup>2</sup>

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<sup>1</sup> Throughout this memorandum, *proposed project* refers to both the proposed project (under the California Environmental Quality Act) and the proposed action (under the National Environmental Policy Act).

<sup>2</sup> UC Regents is a legal entity that includes all of the University of California campuses.

The University of California, Berkeley (UC Berkeley) (on behalf of UC Regents) and NASA are preparing a joint environmental impact report/environmental impact statement (joint EIR/EIS) for the proposed project that evaluates the following:<sup>3</sup>

- CEQA Proposed Project (NEPA Build Alternative 1)
- CEQA Reduced Density Alternative (NEPA Build Alternative 2)
- CEQA Reduced Height Alternative
- CEQA No-Project/Existing Conditions Alternative
- NEPA No-Action Alternative

The proposed project is located at NASA's Ames Research Center (NASA ARC) on an approximately 39-acre project site (Project Site), along with approximately 6 acres of off-site areas (Off-Site Areas) where utility improvements and building demolition would take place. Together, the Project Site and Off-Site Areas comprise the approximate 45-acre limits of work (Limits of Work).

This memorandum is provided for informational purposes and evaluates the potential impacts on aesthetic resources that could result from construction and operation of the proposed project. This memorandum also describes existing visual characteristics within the Limits of Work as well as the regulatory framework for this analysis. The evaluation of potential impacts on aesthetics and visual resources is based on a review of photographs, visual simulations, site reconnaissance materials, and project data. The specific impacts examined in the analysis pertain to the proposed project's potential to change the visual quality and character of the area and create new sources of light and glare.

No questions or concerns related to aesthetics and visual resources were identified in the Notice of Preparation (NOP) or Notice of Intent (NOI) (Appendix 1-1, *Scoping Report*, of the joint EIR/EIS).

## Senate Bill 743 and Transit Priority Areas

In accordance with Senate Bill (SB) 743, aesthetics and parking impacts shall not be considered in determining if a project has the potential to result in significant environmental effects, provided the project meets the following criteria under Public Resources Code Section 21099, Modernization of Transportation Analysis for Transit-Oriented Projects:

- The project is on an infill site,
- The project is in a Transit Priority Area (TPA), and
- The project is a residential, mixed-use residential, or employment-center project.

An infill site is a lot located within an urban area that has been previously developed or a vacant site where at least 75 percent of the perimeter of the site adjoins or is separated only by an improved public right-of-way from parcels that are developed with qualified urban uses (Public Resources Code Section 21099[a][4]). A TPA is defined as an area within 0.5 mile of an existing or planned major transit stop, such as a rail transit station, ferry terminal served by transit, or the intersection of two or more major bus routes (Public Resources Code Section 21099[a][7]).

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<sup>3</sup> Throughout this memorandum, the discussion of the CEQA Proposed Project and the CEQA Reduced Density Alternative also applies to the corresponding Build Alternative under NEPA.

The proposed project meets all of the above criteria. The Project Site is a qualifying infill site. The Limits of Work, which include the Project Site, are currently developed with 18 buildings. The existing buildings are mostly vacant; many were formerly used as ancillary buildings that supported Navy operations. Most of the perimeter of the Project Site adjoins urban uses. The Metropolitan Transportation Commission (MTC) has identified locations for TPAs within the Bay Area. The Project Site is within a TPA because of its proximity to the Bayshore/NASA Santa Clara Valley Transportation Authority (VTA) light rail station, as shown in Figure 2-14, Transit Priority Area Map (Chapter 2, *Proposed Project/Proposed Action and Alternatives*).<sup>4</sup>

The CEQA Proposed Project and CEQA Reduced Density Alternative meet the above criteria because they consist of an employment-center and mixed-use residential project. Because the CEQA Proposed Project and CEQA Reduced Density Alternative meet the three TPA criteria, the environmental impact report (EIR) portion of this joint document does not consider aesthetics or vehicular parking in determining the significance of impacts under the California Environmental Quality Act (CEQA). However, this analysis includes a discussion of the proposed project's potential CEQA impacts related to aesthetics for informational purposes only. For an analysis of aesthetics and visual resources required under the National Environmental Policy Act (NEPA) and the environmental impact statement (EIS) portion of this joint document see Chapter 4, *Environmental Impact Analysis*. Please refer to Chapter 2, *Proposed Project/Proposed Action and Alternatives*, for more information about how the CEQA Proposed Project and CEQA Reduced Density Alternative conform with SB 743.

## Affected Environment/Environmental Setting

The 39-acre Project Site is on federal land within the National Aeronautics and Space Administration Ames Research Center (NASA ARC), an approximately 2,000-acre facility located between U.S. 101 and the southwestern edge of San Francisco Bay, as shown in Figure 2-1, Project Location, in Chapter 2, *Proposed Project/Proposed Action and Alternatives*. NASA ARC is composed of the original ARC campus, Moffett Federal Airfield, airfield support facilities, barracks, support facilities for current and former military personnel, and open space. In addition, the proposed project includes approximately 6 acres of off-site areas (Off-Site Areas) where utility improvements and building demolition would take place. Together, the Project Site and Off-Site Areas comprise the approximate 45-acre limits of work (Limits of Work) and 18 total existing buildings. The city of Mountain View borders NASA ARC to the north and southwest; the city of Sunnyvale borders NASA ARC to the southeast and east. NASA ARC is approximately 33 miles south of the city of San Francisco and 8 miles north of the city of San José.

The existing setting is depicted in Figures 2a through 12a, included at the end of this memorandum.

### Vicinity of the Project Site

The vicinity of the Project Site comprises a mix of uses. Northwest of the Project Site, across Wescoat Road, is Shenandoah Plaza, a linear open space surrounded by two-story, Mission-style buildings clustered in a formal campus-like layout defined by a west-facing gated entrance and landscape that includes mature trees, shrubs, and manicured lawns. Approximately 250 feet northeast of the

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<sup>4</sup> Metropolitan Transportation Commission. 2021. *Transit Priority Areas*. Available: <https://opendata.mtc.ca.gov/datasets/MTC::transit-priority-areas-2021-1/explore>. Accessed: July 18, 2024.

Project Site, across from the intersection of Wescoat Road and Cody Road, is Hangar One, one of the largest freestanding structures in the world. Hangar One, constructed in 1933, is a one-story, steel-truss building with a height of approximately 211 feet (or approximately nine-stories tall); it covers 8 acres of land. Due to its size, structural construction, and historic significance, Hangar One is a dominant landmark and one of the most distinctive landscapes in the southern San Francisco Bay Area. Hangar One and many of the surrounding buildings, landscapes, and objects north of the Project Site are within the boundaries of the Naval Air Station (NAS) Sunnyvale Historic District. The NAS Sunnyvale Historic District comprises the core 1930s-era campus of the NAS Sunnyvale, in addition to Hangar One and one remaining World War II-era aircraft hangar on the east side of the airfield. Although most properties that contribute to the NAS Sunnyvale Historic District are buildings and structures within the original NAS Sunnyvale administrative campus, the district also includes small-scale features and landscape elements, including the memorial anchor, flagpole, and commons.<sup>5</sup> The Project Site extends a short distance into the expanded NAS Sunnyvale Historic District,

East of the Project Site, across Cody Road, is the airfield. East of Moffett Federal Airfield is the city of Sunnyvale and large office/research-and-development (R&D) campuses occupied by Google, Amazon, Lockheed Martin, and Meta. Beyond the southern border of the Project Site, along Girard Road in the NRP, is a recreational field and facilities previously used to support Navy operations; farther south is U.S. 101 and the city of Mountain View. West of the Project Site is Wescoat Village at Moffett Field, an area managed by the U.S. Army that comprises multi-family and single-family residences. North of the Project Site, beyond Shenandoah Plaza, is the Ames Center, which includes the world's largest wind tunnels, among other highly specialized R&D facilities. Farther northwest of the Project Site are additional large office/R&D Google facilities, both on NASA land and within the city of Mountain View.

## Limits of Work

### Visual Character

The Limits of Work are currently developed with 18 one- to three-story buildings that total approximately 185,600 square feet (including approximately 132,500 square feet of vacant uses and approximately 53,100 square feet of occupied uses), along with surface parking lots, roadways, and utility infrastructure, as depicted in Figure 2-4, Existing Conditions Site Plan (Limits of Work) as depicted in Figure 2-4, Existing Conditions Site Plan (Limits of Work) in Chapter 2, *Proposed Project/Proposed Action and Alternatives*. The existing buildings are mostly vacant; many were formerly used as ancillary buildings that supported Navy operations (e.g., offices, food service, a gas station, pool, recreation center, and lodging). The other existing buildings within the Limits of Work comprise industrial, storage, and utility facilities. The buildings range in height from approximately 15 to 45 feet above the finished grade. In addition, there are approximately 900 existing parking spaces within the Limits of Work.

A visual relationship between existing buildings within the Limits of Work is limited because construction occurred over an extended period of time. In addition, buildings were constructed for a

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<sup>5</sup> Urban Programmers. 1994. United States Naval Air Station Sunnyvale, California Historic District. National Register of Historic Places Registration Form, on file at the U.S. Department of the Interior, National Park Service, 7-15.

variety of uses, resulting in an incoherent building design aesthetic. In general, buildings are large, plain, and architecturally undistinguished one-story buildings. Because of the sprawling nature of the Limits of Work, there is no vantage point from which all buildings are visible.

The buildings within the Limits of Work are surrounded by parking lots, paved and unpaved areas, pedestrian paths, and fencing. The Limits of Work is currently covered with a substantial amount of impervious hardscape. This includes roofs, surface parking lots, streets, and paths, which, in total, cover approximately 70 percent of the Project Site. The Project Site is relatively flat, with existing grades gradually sloping from south to north. Paved areas are generally graded toward on-site drainage facilities.

Off-Site Areas (not included as part of the boundaries of the Project Site) could occur within 6 acres within the limits of Zook Road, Cummins Avenue, Wescoat Road, Bailey Road, Perimeter Road, Cody Road, Clark Road, and Moffett Boulevard, dependent on utility layout options selected and to the extent feasible (i.e., where the improvements would not be physically prevented by other existing utilities or physical constraints). In addition, existing Buildings 543, 583A, 583C, 547E, and 944 are included in the Off-Site Areas. The buildings range in size from 9,460 sf to 30,900 sf and are currently vacant.

## Vegetation

Vegetation on the Project Site is largely the result of landscaping that was associated with the on-site structures. Trees currently on the Project Site include native trees, such as coast redwood, ornamental trees, and adapted non-native trees, such as London plane and Canary Island pine. Trees are located throughout the Project Site but are primarily within the southern portion. There are approximately 245 trees on the Project Site, with 42 individual species. Approximately 16 percent of the trees are in good condition, 56 percent of the trees are in fair condition, 27 percent of the trees are in poor condition, and 1 percent of the trees are dead.<sup>6</sup>

## Visibility

Within the interior of the Project Site, views are limited because of distance, flat topography, on-site buildings, and perimeter fencing and vegetation. Because the elevation is almost flat, even elements as small as landscape trees, hedges, and low buildings block most sight lines across NASA ARC. Foreground views in the center of the site include visually inconsistent buildings, surface parking areas, ruderal vegetation, and some mature trees. Looking north, Hangar One is the prominent visual feature in the middle ground, along with a water storage tank north of Wescoat Road. Views to the east and south are limited to intervening structures and vegetation in the foreground. However, channelized views of the distant East Bay Hills are visible across the bay. Facing west, views beyond the Project Site encompass mainly non-descript off-site buildings in the middle ground and channelized views of the Santa Cruz Mountains in the background.

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<sup>6</sup> Hort Science. 2024. *Preliminary Arborist Report: Ames Research Center, Mountain View (Santa Clara County), CA*. September 2024.

## View Corridors

*Viewer sensitivity*, which refers to a viewer's reaction to landscape change, is affected by viewer activity, awareness, and expectations in combination with the number of viewers and the duration of the view. *Visual sensitivity* is generally higher for people who are driving for pleasure, engaging in recreational activities (biking, walking, or hiking), and residents of an area. For purposes of this analysis, sensitive viewers include individuals with a direct view of the Project Site from a public vantage point. These include employees and individuals traveling on public roadways, riding in bike lanes, or walking on sidewalks, along with those at nearby recreational facilities.

Because the Project Site is located within NASA ARC, access to the Project Site and the surrounding area is currently controlled through security and visitor checkpoints located at the main gate on Clark Road or at the gate located on Ellis Street. Therefore, "view corridors" are accessible only once through the controlled gates. Roadway access to the Project Site within NASA ARC is provided from driveways on Wescoat Road, Cody Road, Dailey Road, and Edquiba Road. However, NASA anticipates operational modifications to allow a free flow of traffic at the two checkpoints, as shown in Figure 2-11, Open Campus (Chapter 2, *Proposed Project/Proposed Action and Alternatives*). The "open campus" conditions would be implemented regardless of the CEQA Proposed Project or CEQA Reduced Density Alternative. Although the surrounding streets are not currently considered "public view corridors," by the time the project is fully developed, the streets will be open to the public. Therefore, views from the surrounding streets and open space areas are discussed below, but referred to as "view corridors" since these areas are not public under existing conditions.

Although portions of the Project Site are visible from the surrounding streets, the Project Site is not visible in its entirety from a single ground-level vantage point because of its size, the flat topography, and intervening low-rise buildings and vegetation. However, there are several vantage points with views toward the Project Site, as discussed below. View corridors in and around the Project Site include views to Hangar One, key heritage buildings, and character areas, such as Shenandoah Plaza, the airfields, and the burrowing owl preserve in the greater NASA ARC.

**Views from Wescoat Road.** Wescoat Road, with an east–west orientation, is the northern border of the Project Site, which is highly visible from the road when facing south. Wescoat Road provides the seam between the historic district on the north side of the street and the Project Site on the south side of the street. North of Wescoat Road is a stretch of land between the eastern end of Shenandoah Plaza and Hangar One, which is highly visible when facing east. The area includes historic Spanish Colonial Revival structures that are interspersed with a large number of infill structures. These infill buildings are generally unobtrusive because they are smaller in height and scale than the original historic buildings. They are used predominantly for storage and light industrial uses and, therefore, are more utilitarian in design than the historic structures. There are few trees and a minimal amount of landscaping in the immediately adjacent area north of Wescoat Road; the area is dominated by industrial-looking buildings set back from Wescoat Road and impervious surfaces that are used mainly for parking abutting Wescoat Road. A stand-alone red-and-white water storage tank is prominent throughout the area.

**Views from Cody Road.** Cody Road, with a north–south orientation, is the eastern border of the Project Site, which is highly visible from the road when facing west. East of Cody Road is an area characterized by sizeable open areas, including an undeveloped section of land alongside the airfield that supports a burrowing owl population within the burrowing owl preserve. The area also includes low-scale industrial buildings that support Moffett Federal Airfield, including an air traffic

control tower. A historic P-3 Orion airplane is displayed at Moffett Federal Airfield and is a prominent visual feature along Cody Road. The open spaces east of Cody Road are not formally landscaped and are not central-organizing features of the built environment around them. The expansive open spaces and parking lots east of Cody Road contribute to the area's less built-up feel. In addition, the open spaces allow for unobstructed views to the east of the airfield and the hangars, along with views to the west of the Santa Cruz Mountains. Farther east is the airfield, which is an open expanse of concrete with grass median strips; it has two runways. The vast airfield provides a large view corridor in the area, allowing views to the east and the rest of NASA ARC and the salt ponds beyond. Beyond the airfield to the east are views of the existing seven-story office buildings in Moffett Park,

**Views from Edquiba Road.** Edquiba Road, with an east-west orientation, is in the southern portion of the Project Site. South of Edquiba Road is a group of historic barracks, which are densely clustered. The barracks that run north-south are two stories tall and covered with white stucco. The buildings that run east-west are three-story, gray concrete block structures with access from outside corridors that run the length of each building on each floor. Both sets of buildings are typical of the plain, functional style that is characteristic of most military architecture. The barracks are surrounded by open lawn areas. Streets and parking lots are edged by mature trees. The NASA Lodge and NASA Ames Conference Center, two low-rise buildings, are located in this area.

**Views from Shenandoah Plaza.** Shenandoah Plaza, which is included in the NAS Sunnyvale Historic District, is approximately 0.1-mile northwest of the Project Site. It includes a horseshoe-shaped central lawn. Shenandoah Plaza has three architectural character zones: Spanish Colonial Revival, utilitarian/streamlined Mission Revival, and Moderne. Historic Spanish Colonial Revival buildings surround the open lawn area; the buildings include characteristic plain stucco walls, low-pitched red tile roofs, and terra cotta ornamentation. The formal axis of the lawn faces eastward toward the Administration Building, behind which is the immense form of Hangar One, the focal point in the area. In addition to the lawn, mature trees line the plaza, which gives the western end of Shenandoah Plaza a formal, park-like feel, which is distinct from the surrounding landscape. Monument signage and several decorative features are scattered throughout the park, such as a model space shuttle and former naval equipment. Existing buildings and other existing features at the Project Site are not currently visible due to intervening structures, mature vegetation, and the heights of the existing buildings (15 to 45 feet tall).

**Views from East of the Airfield.** As discussed above, because of the airfield, large view corridors are available in this area due to the vast amount of open space. The area east of the airfield includes buildings used by the National Guard Air Base, Hangar Two, the Golf Club at Moffett Field, and several burrowing owl preserves. In addition to the clusters of small, architecturally undistinguished buildings and associated paved parking lots, the area includes trees, grassy expanses, landscaped medians, and parcels that have been left in their natural form. The golf course includes tree-lined fairways and raised grass mounds. The course is skirted by undeveloped ruderal land. Buildings at the Project Site are visible from areas east of the airfield but are not dominant features due to distance and scale and height of the buildings. Instead, the dominant views when facing west encompass Hangar One and the Santa Cruz Mountains, which are largely unobstructed.

**Views from South of the Project Site.** Beyond the southern border of the Project Site, along Girard Road in the NRP, is a former recreational field and facilities that were previously used to support Navy operations; the facilities abut U.S. 101. Unlike Shenandoah Plaza, the open spaces in this area are not

formally landscaped, nor are they the central-organizing features of the built environment around them. Due to the limited development in this area, as well as the vast open space for the burrowing owl preserve southeast of the Project Site, views of Hangar One are visible to the north. However, due to generally flat topography and intervening structures and landscaping, views of the buildings at the Project Site from areas to the south are limited, with the exception of U.S. 101. Because U.S. 101 is slightly elevated above NASA ARC, the rooftops of some buildings at the Project Site are intermittently visible between mature vegetation. U.S. 101 provides a formidable visual and physical barrier throughout the South Bay; therefore, the Project Site is not visible from areas on the south side of the freeway. U.S. 101 is eight lanes wide and bordered by dense vegetation on both sides.

## Light and Glare

*Light pollution* refers to all forms of unwanted light in the night sky, including glare, light trespass or spill on adjacent sensitive receptors, sky glow, and over-lighting. Views of the night sky are an important part of the natural environment. Excessive light and glare can be visually disruptive to humans and nocturnal animal species. Light pollution in the region is mainly restricted to areas with lighting along major streets and freeways or areas with nighttime illumination within commercial and industrial areas.

Existing sources of light at the Project Site include light fixtures on buildings, along walkways, and within parking areas. However, because the Project Site is partially vacant, many of the buildings and walkways do not provide nighttime lighting. Limited lighting from lamp posts is provided along Wescoat Road; no other street lighting is provided. As such, the only existing sources of light at the Project Site are vehicle headlights on adjacent roadways and U.S. 101 and spill light from adjacent uses such as the airfield, along with limited on-site lighting. Sources of glare are limited to windows on buildings that reflect sunlight, glass doors, and parked vehicles. Sources of nighttime glare include vehicle headlights and light fixtures. Due to the relatively vacant nature of the Project Site, light and glare are minimal at the Project Site. However, because of the generally urbanized nature of the surrounding area, including U.S. 101 to the south and the office developments to both the east and south, a significant amount of ambient nighttime light currently exists, affecting views of the nighttime sky. The Bortle scale rates the night sky's visibility on a scale from 1 for the darkest skies to 9 for city centers.<sup>7</sup> The Bortle scale rates the area around the project site as Class 7,<sup>8</sup> meaning the project site is in a suburban/urban transition zone with major sources of light pollution in the area. However, areas to the north include salt ponds, marshes, the golf course, and other open spaces, which provide negligible nighttime lighting.

## Plans, Policies, and Regulations

UC Berkeley is constitutionally exempt from local governments' regulations, such as city and county general plans, land use policies, and zoning regulations, whenever using property under its control in furtherance of its educational purposes. As such, UC Berkeley will not consider local policies and

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<sup>7</sup> NASA, Night Sky Network. 2024. "May's Night Sky Notes: Stargazing for Beginners." April 16, 2024. Available: <https://nightsky.jpl.nasa.gov/news/162/>. Accessed September 16, 2025.

<sup>8</sup> Jurij Stare, [lightpollutionmap.info](http://lightpollutionmap.info). 2015. "Zenith Sky Brightness Info." Available: [www.lightpollutionmap.info](http://www.lightpollutionmap.info). Accessed February 3, 2026.

regulations in its evaluation of the environmental effects of the proposed project unless UC Berkeley expressly decides to use a local policy or regulation as a threshold or standard of significance.

NASA's Ames Research Center (ARC), including the area where the proposed action would be built and operated, is an area of exclusive federal jurisdiction. In the absence of an explicit waiver of sovereign immunity by Congress, state and local government regulations (e.g., city and county general plans, land use policies, zoning regulations, and state environmental laws) do not apply to areas of exclusive federal jurisdiction. Therefore, state and local government requirements will not be considered as applicable to the proposed action, when the proposed action and environmental effects are located on ARC jurisdictional property. This includes mitigation measures proposed in accordance with those state and local government regulations that are not applicable in areas of federal jurisdiction; such proposed mitigation measures are optional on the part of NASA. However, NASA may, at its discretion, expressly apply a state or local requirement for purposes of establishing a threshold or standard of significance and may elect to comply with mitigations measures required by state or local governmental agencies.

This memorandum summarizes plans, policies, and regulations considered in the analysis.

## **Federal Regulations**

### **National Historic Preservation Act, Section 106**

Archaeological and architectural resources (buildings and structures) are protected through the National Historic Preservation Act (16 United States Code 470f), the Archaeological and Historic Preservation Act of 1974, and the Archaeological Resources Protection Act of 1979. Consultation pursuant to Section 106 of the National Historic Preservation Act (NHPA) mandates that federal agencies consider the effects of projects on historic properties and seek comments on their actions from an independent reviewing agency, the State Historic Preservation Office (SHPO) and/or the Advisory Council on Historic Preservation (ACHP). Title 36 of the Code of Federal Regulations provides the methodology for assessing impacts on historic properties and details the requirements of the consultation process. For complex projects and programs expected to continue over time, the Section 106 regulations allow development of a Programmatic Agreement (PA) that governs ongoing and future activities undertaken as part of the project or program it addresses. An agency may fulfill its obligations under Section 106 by following the alternate review process outlined in a PA. NASA, in consultation with the Advisory Council on Historic Preservation, the National Conference of State Historic Preservation Officers, and other consulting parties, developed the NASA Nationwide Programmatic Agreement (NPA) as a Section 106 program alternative pursuant to 36 CFR 800.14(b). Executed in October 2025, the NPA governs NASA's implementation of alternate procedures for project review and the resolution of adverse effects on historic properties under Section 106. Historic properties and impacts to them are analyzed in Section 4.5.5, *Cultural Resources*, in Chapter 4, *Environmental Impact Statement*, of this joint EIR/EIS. NASA will use the process described in the NPA to satisfy its obligations under Section 106.

### **NASA Ames Development Plan**

The NASA Ames Development Plan (NADP) details transformation of the original 500-acre NASA ARC campus as well as the 1,500-acre site of the former Naval Air Station Moffett Field into an integrated, dynamic research and education community. The transformation would be led by

establishment of the NRP, a research-and-development campus for partners from academia, industry, and non-profit organizations with shared goals in support of NASA's mission. The NADP is the guiding advisory document for the Project Site, with development goals, objectives, and planning principles, along with planning goals specific to the NRP. The main development goal is to develop a world-class, shared-use R&D campus in association with government entities, academia, industry, and non-profit organizations. The NADP provides a framework to guide the use, renovation, management, and development of facilities at NASA ARC to achieve that goal. The unifying principles related to aesthetics and visual resources that guide the planning process for the entire NASA ARC site are centered on the creation of a community and the protection of historic resources. In addition, the principle related to transportation demand management ensures a minimal visual impact associated with parking areas for viewers on the street and within adjacent buildings.

## Ames Research Center Directives and Procedural Requirements

The Ames Research Center Directives and APR<sup>9</sup> are a public listing of NASA ARC policies and procedures. These policies ensure compliance with NASA's standards and authorize review, assessment, and approval of projects at NASA ARC. The policies also address NASA ARC's conformance with federal, state, and local land use plans and regulations.

NASA will review and consider for approval the Master Plan and Development Guidelines as part of the project.<sup>10</sup> Upon completion of the NEPA process, the specifics regarding each building's architectural design and configuration within the Project Site will be reviewed for conformance and approval through NASA's NRP Design Review Board process (pursuant to Ames Procedural Requirement [APR] 8822.1). The Design Review Program is typically a two-stage process: Pre-Conceptual Design Review (to adequately define the scope of a project, to determine the level of environmental review needed for site approval, and to ensure that an applicant conforms to applicable requirements) and Preliminary Design Review (which includes submission for the Concept Design Phase [CDP]). The NEPA process for the proposed project would address the purpose of the Pre-Conceptual Design Review stage; thus, the need for a Pre-Conceptual Design submission for the proposed project may be waived. During the Preliminary Design Review stage, NASA will assess whether the design and configuration of the proposed project complies with the NADP and Project Site-specific NEPA documents, including the Master Plan Maximum and Minimum Development Parameters as well as the Standards in the Development Guidelines, as documented in the Record of Decision. Overall project approval consistent with the procedures outlined in APR 8829.1 is required before NASA will issue any permits for construction for the proposed project.

## Federal Aviation Regulation Part 77

Federal Aviation Regulation Part 77 establishes standards and notification requirements for objects affecting navigable airspace. This notification serves as the basis for evaluating the effect of the

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<sup>9</sup> National Aeronautics and Space Administration. 2024. *Ames Research Center Directives*. Available: <https://www.nasa.gov/ames-research-center-directives/>. Accessed: August 27, 2025.

<sup>10</sup> Upon issuance of the Record of Decision for the proposed action, the Master Plan, Development Guidelines, Environmental Issues Management Plan, Transportation Demand Management Plan, and other Project Site-specific documents will apply to the Project Site.

construction or alteration on operating procedures. NASA ARC has applied Federal Aviation Administration (FAA) civilian standards to determine adjacent land uses and airport operating clearances for Moffett Federal Airfield. Due to the Project Site's proximity to Moffett Federal Airfield, the Project Site is within an FAA notification area and height restriction area with a contour range of 157 feet above mean sea level based in National Geodetic Vertical Datum (NGVD) of 1988 to 182 feet above mean sea level based in NVGD of 1988 per Federal Aviation Regulation Part 77, Surfaces Map, for Moffett Federal Airfield.<sup>11</sup> Federal Aviation Regulation Part 77, Safe, Efficient Use, and Preservation of the Navigable Airspace, establishes imaginary surfaces for airports and runways as a means of identifying areas of airspace wherein objects would be obstructions to air navigation.

## **State Regulations**

### **California Building Code**

The California Building Standards Code is the building code for California and Title 24 of the California Code of Regulations (CCR). It is maintained by the California Building Standards Commission, which is granted the authority to oversee processes related to the California building codes by California Building Standards Law. The California building codes under Title 24 are based on several criteria: standards adopted by states, based on national model codes; national model codes adapted to meet California conditions; and standards passed by the California Legislature that address concerns specific to California.

### **Senate Bill 1467 – California State Scenic Highways**

In 1963, the California Legislature established the California Scenic Highway Program through SB 1467 (Farr). The bill declared "the development of scenic highways will not only add to the pleasure of the residents of this state but will also play an important role in encouraging the growth of the recreation and tourism industries, upon which the economy of many areas of this state depend." The California Scenic Highway Program, maintained by the California Department of Transportation (Caltrans), protects State Scenic Highway corridors from changes that would diminish the aesthetic value of lands adjacent to the highways. A highway's designation of "scenic" depends on how much of the natural landscape travelers can see, the scenic quality of the landscape, and the extent to which development intrudes on travelers' enjoyment of the view. The segment of I-280 that runs from the Santa Clara county line to the San Bruno city limit, approximately 5 miles west of the Project Site, is designated as a State Scenic Highway by Caltrans.

### **California Public Resources Code Section 21099 – Modernization of Transportation Analysis for Transit-Oriented Infill Projects**

CEQA Section 21099 allows for a determination that aesthetic and parking effects of a project need not be considered significant environmental effects.

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<sup>11</sup> Santa Clara County Airport Land Use Commission. 2012. Santa Clara County Moffett Federal Airfield Comprehensive Land Use Plan. Figure 6: Moffett Federal Airfield FAR Part 77 Surfaces. Adopted November 2, 2012; amended December 19, 2018.

## **Senate Bill 743 and Transit Priority Areas**

As discussed above, in accordance with SB 743, aesthetics and parking impacts shall not be considered in determining if a project has the potential to result in significant environmental effects, provided the project meets certain criteria under Public Resources Code Section 21099, *Modernization of Transportation Analysis for Transit-Oriented Projects*. The Project Site is a qualifying infill site pursuant to SB 743. Therefore, the discussion of the potential aesthetics changes as a result of the proposed project is provided for informational purposes.

## **Local Regulations**

### **Santa Clara County Moffett Federal Airfield Comprehensive Land Use Plan**

The Santa Clara County Airport Land Use Commission was established to provide for appropriate development of areas surrounding public airports in Santa Clara County. It is intended to minimize the public's exposure to excessive noise and safety hazards, and to ensure that the approaches to airports are kept clear of structures that could pose an aviation safety hazard.

Due to the Project Site's proximity to Moffett Federal Airfield, the Project Site is within the area covered by the Santa Clara County Moffett Federal Airfield Comprehensive Land Use Plan (Moffett CLUP), adopted in 2012 by the Santa Clara County Airport Land Use Commission. The Moffett CLUP is intended to safeguard the general welfare of inhabitants within the vicinity of Moffett Federal Airfield and aircraft occupants. Although NASA has not elected to apply the Moffett CLUP to NASA ARC, compatibility criteria contained within the Moffett CLUP are applicable to development within the Project Site. The Moffett CLUP is also intended to ensure that surrounding new land uses will not affect Moffett Federal Airfield's continued operation. The Moffett CLUP provides a guide to NASA management, as custodian, for decisions that affect the future of Moffett Federal Airfield and provides a basis for additional assessments, if required. The Project Site is not within an Airport Safety Zone, as defined in the Moffett CLUP.

### **Santa Clara County Tree Preservation and Removal Ordinance**

The Project Site is located on federally owned land; compliance with the Santa Clara County Heritage Tree Ordinance is not required. The Project Proponent has provided an analysis of the project's adherence to the requirements of the Santa Clara County Heritage Tree Ordinance in Appendix 3.4-1; this information is provided for informational purposes.

## **CEQA Findings**

This memorandum describes the environmental impacts of the project on aesthetic and visual resources in accordance with CEQA. It describes the thresholds used to determine whether an impact would be significant and methods used to evaluate the impacts.

As discussed above, in accordance with SB 743, aesthetics impacts shall not be considered in determining if a project has the potential to result in significant environmental effects. The Project Site meets all SB 743 criteria because it is an infill development site that is currently

developed with 16 buildings<sup>12</sup> that were formerly used by the Navy, many of which are currently vacant. Most of the perimeter of the Project Site adjoins urban uses. The Metropolitan Transportation Commission (MTC) has identified locations for Transit Priority Areas (TPAs) within the Bay Area. The Project Site is within a TPA because of its proximity to the Bayshore/NASA Santa Clara Valley Transportation Authority (VTA) light rail station. The CEQA Proposed Project and CEQA Reduced Density Alternative meet the above criteria because they consist of an employment-center and mixed-use residential project. Because the CEQA Proposed Project and CEQA Reduced Density Alternative meet the three TPA criteria, the EIR portion of this joint document does not consider aesthetics or vehicular parking in determining the significance of impacts under CEQA. Nonetheless, consistent with SB 743, this memorandum includes a discussion of the proposed project's potential CEQA impacts related to aesthetics for informational purposes only.

A discussion of project impacts for aesthetics and visual resources in accordance with NEPA is provided separately in Section 4.5.2, *Aesthetics and Visual Resources*, in Chapter 4, *Environmental Impact Statement*, in the joint EIR/EIS.

## Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, the proposed project would have a significant effect if it would result in any of the conditions listed below. However, this evaluation under CEQA is provided for informational purposes and does not include any conclusions regarding the level of significance of the potential impacts of the CEQA Proposed Project or CEQA Reduced Density Alternative. As discussed above, because the proposed project meets the criteria for a project in compliance with SB 743, this analysis does not consider aesthetic impacts in determining the significance of impacts under CEQA.

Would the project:

- Have a substantial adverse effect on a scenic vista or substantially degrade the existing visual character or quality of public views of the site and its surroundings if in a non-urbanized area (i.e., public views that are experienced from publicly accessible vantage points) or conflict with applicable zoning and other regulations governing scenic quality if in an urbanized area, including scenic vistas?
- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, within a state scenic highway?
- Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?
- Result in a cumulatively considerable contribution to a significant environmental impact with respect to aesthetics?

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<sup>12</sup> The Project Site includes 16 existing buildings while the Limits of Work include 18 existing buildings.

## Methods for Analysis

The analysis of visual quality within an area considers the physical appearance and characteristics of the built environment, the proximity of man-made structures to open space or landscaping, and views of public open space or more distant landscape features such as hills, water bodies, or built landmarks. These elements help define a sense of place as well as the physical orientation in a larger visual setting. As described above, visual conditions within the vicinity of the Project Site are defined by the generally nondescript architecture of buildings in the National Aeronautics and Space Administration Ames Research Center (NASA ARC) campus, with lines of sight that are often blocked by intervening low-rise structures and vegetation. However, some prominent features dominate the landscape, such as the immense form of Hangar One and the red-and-white water tower in the middle ground. In addition, background views include the Santa Cruz Mountains to the west and the East Bay Hills to the east. The interplay of these elements in the visual setting varies, depending on viewer location.

To illustrate the general appearance of the development proposed at the Project Site, visual simulations from 11 vantage points were prepared, as shown in Figure 1 of this memorandum. Each visual simulation consists of a photograph of existing conditions, with an image of proposed buildings superimposed over the photograph using computer imaging techniques. Because façade articulations and architectural designs have not yet been developed, these features are not included in the illustrative renderings. The visual simulations, provided in Figures 2 through 12 at the end of this memorandum, depict the proposed project and viewer perspective diagrams from the following locations:

- Viewpoint 1: Wescoat Road facing east (Figure 2)
- Viewpoint 2: Wescoat Road facing west (Figure 3)
- Viewpoint 3: Mid-Cody Road facing north (Figure 4)
- Viewpoint 4: Southern Cody Road facing north (Figure 5)
- Viewpoint 5: Shenandoah Plaza facing east (Figure 6)
- Viewpoint 6: Shenandoah Plaza facing southeast (Figure 7)
- Viewpoint 7: Shenandoah Plaza facing south (Figure 8)
- Viewpoint 8: Shenandoah Plaza facing south (Figure 9)
- Viewpoint 9: East of the airfield facing west (Figure 10)
- Viewpoint 10: East of the airfield facing southwest (Figure 11)
- Viewpoint 11: South of the Project Site facing northwest (Figure 12)

Prior to preparing the visual simulations, field investigations by the Project Proponent were conducted to determine those locations that would offer maximum visual exposure of the Project Site from ground-level public vantage points. Bird's-eye renderings and private views are not included in this evaluation. The visual simulation for each view include views of "existing" (i.e., without the project) and "proposed" (i.e., at project completion) conditions. As discussed above, access to the Project Site and the surrounding area is currently controlled through security and visitor checkpoints located at the main gate on Clark Road or at the gate located on Ellis Street. Therefore, view corridors are accessible only once through the controlled gates. However, independent from the CEQA Proposed

Project or CEQA Reduced Density Alternative, NASA anticipates operational modifications to allow a free flow of traffic at these two checkpoints. Although the surrounding streets are not currently considered “public view corridors,” by the time the project is fully developed, these streets will be open to the public. Therefore, the view corridors, although not currently public, are considered for purposes of this analysis.

The proposed project is depicted in the conceptual plans (e.g., Figures 2-5, 2-6, 2-7, and 2-8 in Chapter 2, *Proposed Project/Proposed Action and Alternatives*, of the joint EIR/EIS) and the visual simulations showing illustrative renderings (provided in Figures 2 through 12 at the end of this memorandum). Conceptual plans serve as a framework for general site orientation and the placement of land uses, open spaces, and transportation and other infrastructure, along with the general scale and massing of development and overall architectural themes. Conceptual plans are intended to convey the general vision and design of the project while allowing flexibility in interpretation and implementation. The visual simulations show illustrative renderings of one possible example of development that would substantially conform to the applicable standards and be materially consistent with the vision and design intent conveyed by the conceptual plans. Illustrative renderings are not determinative of the ultimate configuration, building orientation, massing, architectural and landscaping details, or parking.

Although conceptual or illustrative in nature, the conceptual plans and illustrative renderings convey the overall project vision. The illustrative renderings depict one possible example of the CEQA Proposed Project and CEQA Reduced Density Alternative that would substantially conform to massing, scale, height and other applicable standards (i.e., the maximum mechanical screen height and the Maximum and Minimum Development Parameters). The Maximum Development Parameters (depicted in Figure 2-9 in the joint EIR/EIS) illustrate the conceptual horizontal and vertical dimensions for each Subarea. Table 2-3 in Chapter 2, *Proposed Project/Proposed Action and Alternatives*, of the joint EIR/EIS summarizes the proposed maximum and minimum development parameters and standards, which are referenced throughout this analysis. The CEQA Proposed Project or CEQA Reduced Density Alternative would not be built to the full extent of the Maximum Development Parameters in each Subarea due to square footage and applicable standard limitations. The illustrative renderings show the maximum development that could occur, representing a worst-case scenario.

The CEQA Proposed Project and CEQA Reduced Density Alternative would have the same types of land uses at the same locations; the same site plan; the same maximum building height; the same amount of square footage for Conference Uses, Active Uses, Student/Faculty Housing, Short-Term Lodging, and open space; the same number of residents and guests; the same utility infrastructure and roadways; and the same parking ratio. The primary differences between the CEQA Proposed Project and CEQA Reduced Density Alternative would be the number of internal floors, internal floor-to-floor heights, the amount of square footage for Research and Office Uses, the number of employees, the number of students, and the number of parking spaces. In addition, the CEQA Proposed Project and CEQA Reduced Density Alternative would use the same lighting plans and building materials. Therefore, as discussed in more detail below, visual and aesthetic impacts would be the same for the CEQA Proposed Project and the CEQA Reduced Density Alternative for purposes of this discussion.

## Impacts Not Evaluated in Detail

### Impacts on Scenic Vistas

For purposes of this evaluation, a *scenic vista* is defined as a vantage point with a broad and expansive view of a significant landscape feature (e.g., a mountain range, lake, coastline) or a significant historic or architectural feature (e.g., a historic tower). A scenic vista is a location that offers a high-quality, harmonious, and visually interesting view. Scenic vistas could include views of scenic water areas, such as the bay and creeks, and open space areas.

The proposed project would result in additional height, bulk, and massing compared to existing conditions. As a result, the proposed buildings and associated mechanical screening would interrupt the existing partially blocked views of the Santa Cruz Mountains and the East Bay Hills as seen from the Project Site. However, no areas that are designated as scenic vistas in the vicinity of the Project Site would be affected by the development. Scenic vistas would include views toward the Project Site from higher elevations, such as the Santa Cruz Mountains and the East Bay Hills, or from the Bay Trail. However, because of distance, as well as intervening structures and vegetation, the proposed buildings, as seen from scenic vistas, would blend with their surroundings and would either not be visible or would not contrast with the surrounding built environment. This topic is not evaluated further.

### Impacts on Scenic Resources along a State Scenic Highway

The proposed project would not damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway.<sup>13</sup> There are no officially designated state scenic highways or eligible state scenic highways in the vicinity of the Project Site. The nearest State-designed scenic highway, Interstate 280, is approximately 5 miles west of the Project Site.<sup>14</sup> The proposed project would not be visible from this highway. This topic is not evaluated further.

### Impacts on Public Views in Non-Urbanized Areas

The Project Site is in an urbanized area. The applicable threshold in non-urbanized areas regarding substantial degradation of the existing visual character or the quality of public views of the site and its surroundings is therefore not applicable. This topic is not evaluated further.

## Evaluation of the CEQA Proposed Project and CEQA Reduced Density Alternative

The specific impacts examined in this analysis pertain to the proposed project's potential to change the visual quality and character of the area and create new sources of light and glare.

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<sup>13</sup> The California Scenic Highway Program, maintained by the California Department of Transportation (Caltrans), protects State Scenic Highway corridors from changes that would diminish the aesthetic value of lands adjacent to the highways. A highway's designation of "scenic" depends on how much of the natural landscape travelers can see, the scenic quality of the landscape, and the extent to which development intrudes on travelers' enjoyment of the view.

<sup>14</sup> California Department of Transportation. 2025. *California State Scenic Highways*. Available: <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>. Accessed: August 21, 2025.

However, this evaluation under CEQA is informational purposes and evaluates the potential impacts on aesthetic resources that could result from construction and operation of the proposed project.

## Conflict with Applicable Zoning and Other Regulations Governing Scenic Quality

### CEQA Proposed Project (NEPA Build Alternative 1)

For purposes of this evaluation, a conflict with applicable zoning and other regulations governing scenic quality would occur if the proposed project were to introduce a new visible element that would be inconsistent with regulations governing the overall scenic quality, scale, and character of surrounding development. The CEQA Proposed Project would need to be consistent with the land use designation and planning principles in the NASA Ames Development Plan (NADP), the Ames Research Center Directives and the Ames Procedural Requirements (APR), as discussed above. This analysis considers consistency with zoning, the land use designation, and the APD and APR regulations governing scenic quality, along with Federal Aviation Regulation Part 77, Surfaces Map, regarding building height.

### Construction

Construction of the CEQA Proposed Project would occur over a period of approximately 13.5 years (162 months). All staging of construction equipment is expected to be on-site for Phases 1 to 3. Staging of construction equipment during portions of Phase 4 could be off-site at existing paved areas adjacent to the Project Site (to the south or east) but within NASA ARC areas that would be suitable for construction material.<sup>15</sup> Construction fencing and existing landscaping would provide visual screening. Although construction equipment would be visible from view corridors, visual degradation associated with construction would be relatively short term and temporary and would not conflict with applicable regulations governing scenic quality.

### Operation

#### Project Design

**Building Heights and Step-down Zone.** The proposed buildings would have a maximum height of approximately 80 feet, with an exceedance of up to 25 feet (i.e., approximately 105 feet in total) allowed for mechanical equipment and screens, with a limited number of minor protrusions allowed for exhaust fans and other small appurtenances. Building heights are shown in Figure 2-7, Conceptual Building Heights and Figure 2-8, Conceptual Elevations, in Chapter 2, *Proposed Project/Proposed Action and Alternatives*.<sup>16</sup> A range of internal floor-to-floor heights is allowed under the CEQA Proposed Project. The ground-floor height would range from 20 to 26 feet; the typical floor height would range from 15 to 18 feet. All proposed parking would be provided in two

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<sup>15</sup> The use of areas adjacent to the Project Site (i.e., to the south or east) within NASA ARC would be contingent on subsequent NASA review and approval of those areas for use.

<sup>16</sup> The highest occupied floor level would be equal to or less than 75 feet; in accordance with Section 202 of the California Building Standards Code, the proposed project would not be considered a high-rise structure.

aboveground parking garages. Subarea 4 would include a parking garage; Subarea 6 would include either an aboveground parking garage or a podium parking structure. The height of the parking garages would be consistent with the height of other proposed buildings.

Figure 2-9, Maximum and Minimum Development Parameters and Standards, in Chapter 2, *Proposed Project/Proposed Action and Alternatives*, is a conceptual layout depicting the horizontal and vertical dimensions of the proposed development under the CEQA Proposed Project, based on the proposed maximum and minimum development parameters and standards for each subarea (see Section 2.3.1, *Proposed Berkeley Space Center Master Plan and Proposed Berkeley Space Center Development Guidelines*). The proposed buildings along Wescoat Road and Cody Road would include a stepdown zone, consisting of a 15-foot stepback for portions of the buildings higher than 35 feet. In addition, mechanical screens along Cody Road and Wescoat Road would be set back and restricted in height at a 45-degree angle to the 25-foot maximum mechanical screen height.

The Central Utility Plan (CUP) Option would include a centralized heating and cooling system that would be incorporated within the parking garage in Subarea 4. Although the CUP Option would result in a larger building area, the CUP building would fit within the maximum height of the parking garage proposed under the CEQA Proposed Project. The CUP would require additional equipment on the roof deck of the parking structure compared to the CEQA Proposed Project without the CUP Option; the equipment would be screened from view at ground level, with a limited number of minor protrusions allowed for exhaust fans and other small appurtenances.

The Water Reuse Facility (WRF) Option would incorporate the facility on the ground floor of the parking structure located in Subarea 6 near Girard Road. The WRF Option would fit within the maximum height of the parking garage proposed under the CEQA Proposed Project and, therefore, would not be visibly different from the maximum development considered in this analysis.

In addition, the CEQA Proposed Project is consistent with Federal Aviation Regulation Part 77 and the Moffett CLUP, as discussed in more detail in Section 3.11, *Land Use and Planning*.

**Building Design.** The exterior design of the proposed buildings would include metal panels, exposed and painted structural steel, concrete, glass curtain walls, glazing with frit inlay or colors, terracotta, aluminum frames, plaster, and natural wood. The massing, materials, and colors used for the proposed building design would be modulated to create a human-scaled public realm that minimizes the appearance of building bulk and mass and avoids visual clutter. In addition, mechanical equipment located on the roofs of the proposed buildings, as well as emergency generators, would be screened from view from public streets, with a limited number of minor protrusions allowed for exhaust fans and other small appurtenances.

Building façades would be designed with depth-of-shading elements, fritted glass, and solid materials, as outlined in the standards set forth in the Development Guidelines, that would be in compliance with the California Green Building Standards Code (CALGreen)—specifically, Non-Residential Voluntary Measure A5.107, Bird-Friendly Building Design (see Section 2.3.1, *Proposed Berkeley Space Center Master Plan and Proposed Berkeley Space Center Development Guidelines*). The CALGreen measure includes design requirements related to glazing, slats, screens, netting, and louvers to minimize the risk

of birds colliding with proposed buildings.<sup>17</sup> Furthermore, the proposed buildings within each of the subareas would incorporate spill-out zones along building frontages. These would include patios and terraces with seating areas that would be fully or partially covered by building articulation, trellises, or tree canopies.

**Open Space and Landscaping.** The CEQA Proposed Project would provide a minimum of 10 acres of publicly accessible open space, including pathways, active uses (e.g., occupied areas that pedestrians could access via sidewalks or pathways), and passive uses (e.g., open lawns, patios). Most of the proposed open space would be located at the center of the Project Site and in the northern, western, and eastern corners of the site. As shown in Figure 2-5, Conceptual Site Plan, in Chapter 2, *Proposed Project/Proposed Action and Alternatives*, the project could have up to four open space areas, consisting of Central Green (Subarea 7), Hangar Commons (between Subareas 2 and 3), Gateway Plaza (between Subareas 1 and 6), and the Promenade (traversing the Project Site in an east–west direction).

The proposed open spaces throughout the Project Site would visually link the Project Site to the historic Shenandoah Plaza (via Gateway Plaza) and Hangar One (via Hangar Commons) using vegetated promenades, paseos, patios, gardens, bosques, and hedgerows. These open spaces would integrate the proposed buildings with the landscape and visually connect the Project Site to the greater surrounding area. Views of the East Bay Hills, Santa Cruz Mountains, and Hangar One would be maintained within the interior of the Project Site and through the Project Site from surrounding areas because of these open spaces.

Landscaping would be incorporated throughout the Project Site and include a mix of native, climate-adaptive, and drought-resistant plant materials, along with phytoremediation-treated species. No invasive and/or noxious plant species would be used in project landscaping. Existing landscaping includes approximately 245 trees located throughout the Project Site. In total, implementation of the CEQA Proposed Project would include removing approximately 227 trees (including up to 158 trees that would qualify as protected trees under the Santa Clara County Heritage Tree Ordinance) and planting approximately 1,283 new trees, resulting in a total of approximately 1,301 trees on the Project Site. Of the 1,283 new trees, 390 trees in a 24-inch box container would be replacement trees. Although tree replacement is not required, the proposed project would include implementation of the protective measures to protect trees before and during construction and avoid future loss of additional trees.<sup>18</sup>

**Streetscape Improvements.** As part of the CEQA Proposed Project, certain streetscape and associated landscape improvements would be constructed adjacent to building frontages and within the Project Site. The improvements would include landscaping, tree planting, and sidewalk, bike lane, loading zone, lighting, and street furniture installations along Wescoat Road, Cody Road, and Girard Road.

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<sup>17</sup> There are several other design requirements with which the project must comply. For example, the project would comply with applicable codes and regulations outlined in APD 8829.1, including, but not limited to, California Code of Regulations Title 24, the National Fire Protection Association’s National Fire Codes, NASA Research Park Design Review Program, and 14 CFR Part 1216, NASA Environmental Quality.

<sup>18</sup> Hort Science. 2024. *Preliminary Arborist Report: Ames Research Center, Mountain View (Santa Clara County), CA*. September 2024. The report is included in Attachment C to Appendix 3.14-1 of this joint EIR/EIS.

## View Corridors

As discussed above, the Project Site is visible from surrounding streets and open space including Wescoat Road, Cody Road, Shenandoah Plaza, areas east of the airfield, and areas south of the Project Site. For purposes of this analysis, sensitive viewers include individuals with a direct view of the Project Site from a vantage point, including along view corridors such as employees and individuals traveling on public roadways, riding in bike lanes, or walking on sidewalks, along with those at nearby recreational facilities. Although the surrounding streets are not currently considered “public view corridors,” by the time the project is fully developed, the streets will be open to the public. Therefore, views from the surrounding streets and open space areas are discussed below, but referred to as “view corridors” since these areas are not public under existing conditions.

The NADP details transformation of NASA ARC campus into an integrated, dynamic research and education community. The unifying principles related to aesthetics and visual resources that guide the planning process at NASA ARC site are centered on the creation of a community and the protection of historic resources. The planning principle that outlines requirements for transportation demand management at NASA ARC also ensures minimal visual impact associated with parking for viewers on the street and within adjacent buildings. To prevent the obstruction of key views of Shenandoah Plaza, Hangar One, and the burrowing owl preserve in the greater NASA ARC, proposed buildings at the Project Site would be designed to preserve view corridors through building massing, step-downs, material choices, and other elements. The design of new street layouts and open spaces would create view corridors to Shenandoah Plaza, Hangar One, and the burrowing owl preserve, with the Santa Cruz Mountains and the East Bay Hills in the background. The height of the proposed parking garages would be consistent with the height of other proposed buildings and would be set back from streets by open spaces to create view corridors. Changes to viewpoints in the vicinity of the Project Site are discussed below.

**Views from Wescoat Road (Viewpoints 1 and 2).** Wescoat Road provides the seam between the historic district on the north side of the street and the new development that would occur on the south side of the street. The area to the north currently includes historic Spanish Colonial Revival structures interspersed with a large number of infill structures. However, as shown in Figures 2a (Viewpoint 1) and 3a (Viewpoint 2), the buildings directly north of the Project Site include light industrial warehouse buildings, which are utilitarian in design. Facing east (Viewpoint 1), Hangar One is visible to the northeast, toward the end of Wescoat Road. Although the proposed buildings would add height and bulk to the Project Site (Figure 2b), the buildings would not block views of the historic Shenandoah Plaza or Hangar One from Wescoat Road. No other background views are visible. The proposed Gateway Plaza would also be visible from Wescoat Road in the western portion of the Project Site between Subareas 1 and 6. Gateway Plaza would include seating areas and an outdoor gathering space for the conference center; it would be the western starting point for the Promenade. The Promenade, which would provide a car-free connection through the Project Site in the east-west direction, would help separate the building massing at the Project Site and visually connect the Project Site with Shenandoah Plaza, Hangar One, Wescoat Road, and Cody Road.

As shown in Figure 3a (Viewpoint 2), background views of the Santa Cruz Mountains are currently visible between existing mature trees and buildings when facing west on Wescoat Road, although views of a continuous ridgeline are blocked. Implementation of the CEQA Proposed Project (Figure 3b) would increase the mass and bulk of buildings at the Project Site, effectively blocking the majority of

views of the Santa Cruz Mountains from Wescoat Road. However, a highly channelized view corridor of the mountains would still be available between the proposed buildings. As shown in Viewpoint 2, Hangar Commons would be at the northernmost portion of the Project Site between Subareas 2 and 3, across from Hangar One at the intersection of Wescoat Road and Cody Road. Hangar Commons would include seating areas with direct views to Hangar One. Hangar Commons would allow building setbacks from the intersection of Wescoat Road and Cody Road and new vegetation to screen some of the buildings from view.

Future development at the Project Site would consider the requirements of the NAS Sunnyvale Historic District as viewed from Wescoat Road. The intent of the Master Plan is to include building step-down zones along Wescoat Road that would relay the historic fabric of Shenandoah Plaza and open the view corridor of Hangar One. The step-down zone along Wescoat Road would create a two-story scale along the base of the buildings that would relate to the scale of the existing buildings across the street. Along Wescoat Road, the new buildings under the CEQA Proposed Project would rise taller than the low-scaled buildings currently at the Project Site. The nearest district contributors to the NAS Sunnyvale Historic District along Wescoat Road stand within 100 feet of the Project Site and are typically one or two stories tall, which is perceptibly lower than the maximum development parameter proposed by the project. The 15-foot stepback above a height of 35 feet would somewhat mediate the change in building scale across Wescoat Road between the Project Site and the NAS Sunnyvale Historic District, but the building masses would remain visible from the historic district. The intent of the Master Plan is to preserve and emphasize views from Wescoat Road to the NAS Sunnyvale Historic District, Shenandoah Plaza, and Hangar One.

Impacts related to the historic integrity of the NAS Sunnyvale Historic District as viewed from Wescoat Road as a result of the CEQA Proposed Project are analyzed in Section 3.5, *Cultural Resources*, of the joint EIR/EIS.

**Views from Cody Road (Viewpoints 3 and 4).** Cody Road provides the eastern border of the Project Site, extending in a north-south orientation. At the mid-point of Cody Road, as shown in Figure 4a (Viewpoint 3), facing north, the existing dominant focal points are Hangar One, the water storage tank, and the P-3 Orion airplane displayed at Moffett Federal Airfield. With implementation of the CEQA Proposed Project (Figure 4b), Cody Road would be realigned. The proposed buildings in Subarea 3 would obstruct views of the water storage tank located in the NAS Sunnyvale Historic District as seen from Cody Road; however, views of Hangar One and the aircraft would be retained. The open space at Hangar Commons, at the northernmost portion of the Project Site, would allow a break in building massing, which would allow the preservation of views of Hangar One from Cody Road.

Along Cody Road, Building 158 (the Flight Operations Building) is the primary contributor to the NAS Sunnyvale Historic District that faces the Project Site, but it is separated from the Project Site by more distance (more than 300 feet). Furthermore, Building 158 maintains a close functional and visual relationship with the airfield, which is located adjacent to its east side; the CEQA Proposed Project would not interrupt that relationship.

The southern portion of Cody Road, facing north, as shown in Figure 5a (Viewpoint 4), currently features views of Hangar One and mature trees. The open spaces east of Cody Road are not formally landscaped. The expansive open spaces and parking lots east of Cody Road contribute to the area's less built-up feel. An undeveloped portion of land alongside the airfield supports a burrowing owl population within the burrowing owl preserve. Development at the Project Site would partially block views of Hangar One from Cody Road (Figure 5b). However, the two-story building step-down

zones along Cody Road would emphasize the open view corridor of Hangar One. The intent of the Master Plan is to include two-story step-down zones that would continue from Wescoat Road to Cody Road to maintain a cohesive scale along these two primary roads while also opening the view corridor to Hangar One. A combination of height limits, massing, landscape, screening, and overall site design within the maximum development parameters would reduce the visual effect of the CEQA Proposed Project on views of Hangar One from Cody Road.

In addition, the open space area at the southeast corner of the Project Site (as seen in the foreground of Figure 5b) would serve as both a green buffer and a visual transition between the proposed development and the sensitive habitat area east of Cody Road. The open area at the southeast corner, adjacent to Subarea 4, would allow building setbacks from the southern portion of Cody Road, opening up the view of Hangar One to the north and the open space and burrowing owl preserve to the east and southeast.

Impacts related the historic integrity of the NAS Sunnyvale Historic District as viewed from Cody Road as a result of the CEQA Proposed Project are analyzed in Section 3.5, *Cultural Resources*, of the joint EIR/EIS.

**Views from Shenandoah Plaza (Viewpoints 5 through 8).** As shown in Viewpoints 5 through 8 (Figures 6a through 9a), existing development at the Project Site is not currently visible from Shenandoah Plaza due to intervening structures and mature vegetation. Views are limited mainly to the mature vegetation and historic Spanish Colonial Revival buildings surrounding the central lawn and middle-ground views of Hangar One and the water tower. However, CEQA Proposed Project building would introduce new views with an increased building mass and height from some locations in Shenandoah Plaza.

As shown in Figure 6b, the proposed buildings would be screened from view in the western portion of Shenandoah Plaza by existing dense vegetation and buildings along the perimeter of the lawn. However, views of the proposed buildings would change at the center of the lawn and in the eastern portion of Shenandoah Plaza. As depicted in Figures 7b through 9b, the upper levels and mechanical screens of the proposed buildings along Wescoat Road in Subareas 1, 2, and 6 would be visible. However, the mid- and lower levels of the proposed buildings would be screened from view by the existing buildings, dense vegetation, and mature trees. The buildings would not be a dominant feature in the area, with the viewer's attention focused on the historic buildings in the foreground and the focal points of Hangar One and the water storage tank in the middle ground. In addition, because there are no significant background views (e.g., views of the Santa Cruz Mountains or East Bay Hills) from this area, the proposed buildings would not obstruct any valued view corridors.

The NADP includes planning goals specific to NASA ARC. One goal requires maintaining the character of the historic district associated with Shenandoah Plaza and ensuring architectural compatibility with new construction. The CEQA Proposed Project would be designed to adhere to this planning goal. Although the building design has not yet been determined, the intent of the Master Plan is to design buildings along Wescoat Road, adjacent to the NAS Sunnyvale Historic District, to respect the massing and historic character of the architecture along the northern edge of Wescoat Road. Building materials would be governed by the Development Guidelines to be consistent with the existing historic buildings. In addition, the building façade would be articulated to convey a sense of human scale, denote building entries, and reinforce the streetwall. New development would consider massing and façade strategies that break buildings into a traditional triad of base, middle, and top along Wescoat Road and Cody Road. The base would correspond to the 32-foot max height limit (approximately two

stories) while step-backs would create the middle zone; the top zones would be articulated to address the relationship to the sky.

Impacts related the historic integrity of Shenandoah Plaza as a result of the CEQA Proposed Project are analyzed in Section 3.5, *Cultural Resources*, of the joint EIR/EIS.

**Views from East of the Airfield (Viewpoints 9 and 10).** As shown in Figure 10a, large view corridors can currently be found in the area east of the airfield due to the vast amount of open space. Buildings at the Project Site are currently visible from areas east of the airfield but are not dominant features because of distance and the small scale and height of the buildings (15 to 45 feet). The proposed buildings under the CEQA Proposed Project would increase the height, mass, and scale of development at the Project Site (Figure 10b). The proposed buildings would partially obstruct views of the Santa Cruz Mountains compared to existing conditions; however, some views are partially obstructed by Hangar One and development in the northern portion of NASA ARC. In addition, the buildings would not disrupt views of the ridgeline along the Santa Cruz Mountains. Although the proposed buildings would be taller than buildings under existing conditions, the proposed buildings would be visually compatible with the existing development in NASA ARC, as viewed from this location.

Viewpoint 10 depicts views from the Golf Club at Moffett Field. As shown in Figure 11a, the golf club currently includes tree-lined fairways and raised grass mounds, with dominant views facing west and encompassing Hangar One and the largely unobstructed Santa Cruz Mountains. The buildings proposed under the CEQA Proposed Project would be visible from the golf club. As shown in Figure 11b, the foreground and background views would remain the same, but middle-ground views would be altered slightly. However, in comparison to the massive form of Hangar One, immediately adjacent to the Project Site, the proposed buildings would appear as a minor built element to the overall visual landscape. The continuous ridgeline of the Santa Cruz Mountains, as seen from Viewpoint 10, would be preserved above the proposed buildings.

**Views from South of the Project Site (Viewpoint 11).** As shown in Figure 12a (Viewpoint 11), due to limited development in this area and the vast open space within the burrowing owl preserve southeast of the Project Site, views of Hangar One are available to the north. However, because the existing buildings at the Project Site are smaller in scale and height, views of the buildings from areas to the south are limited. Implementation of the CEQA Proposed Project would introduce additional building massing to the area, as shown in Figure 12b. Buildings would be sited at least 12.5 feet from Girard Road to allow loading zones and landscaped areas, with the majority of the lower levels of the buildings screened from view by existing or proposed vegetation. Compared to Hangar One to the north, as well as development to the south, the buildings at the Project Site would constitute an insignificant element in the surrounding developed landscape.

Because U.S. 101 is slightly elevated above NASA ARC, the rooftops of some existing buildings at the Project Site are intermittently visible between mature vegetation. The buildings under the CEQA Proposed Project would be highly visible from U.S. 101. However, U.S. 101 is not a designated scenic route. Motorists have only fleeting views of the Project Site because of the permitted speeds. In addition, motorists typically direct their attention to the road ahead rather than views. Therefore, views of the Project Site from U.S. 101 do not constitute sensitive views, and development of the Project Site would not significantly alter the visual character of the area. Views would not be significantly altered because of the existing vegetation between U.S. 101 and the Project Site, which would remain; the proposed new landscaping; and the building setbacks.

**Views from Off-Site Areas.** As described above, Off-Site Areas (not included as part of the boundaries of the Project Site) could occur within 6 acres within the limits of Zook Road, Cummins Avenue, Wescoat Road, Bailey Road, Perimeter Road, Cody Road, Clark Road, and Moffett Boulevard, dependent on utility layout options selected and to the extent feasible, (i.e., where the improvements would not be physically prevented by other existing utilities or physical constraints). In addition, existing Buildings 543, 583A, 583C, 547E, and 944 would be demolished to accommodate the proposed off-site utility improvements and realignment of Girard Road. The specifics regarding utility connections and designs will be evaluated through NASA's NRP Design Review Board process, as proposed to be modified in connection with NASA's approval of the proposed project pursuant to APR 8822.1, and through NASA's Construction Permit Review Process, established by APD 8829.1. Adherence to the measures outlined in the APR and APD would ensure that the construction in Off-Site Areas would be consistent with the visual setting.

### **Conclusion**

The CEQA Proposed Project will include the proposed Berkeley Space Center Master Plan (Master Plan), which establishes the overall project vision, conceptual plans, and illustrative renderings, and the proposed Development Guidelines, which provide Maximum and Minimum Development Parameters as well as Standards for the proposed project buildings and open space. Appendix 2-1 of the joint EIR/EIS includes the proposed Master Plan, Development Guidelines. Together, the Master Plan and the Development Guidelines will be included as part of the project application submitted by the Project Proponent to NASA.

Berkeley Space Center's Development Guidelines are the development guidelines for the proposed project. The CEQA Proposed Project would adhere to the Development Guidelines, which include a regulatory framework to manage the proposed redevelopment. The regulatory framework is categorized as principles, guidelines, and standards:

- Principles – Defined as aspirational targets that convey the design intent of the proposed master plan but are not mandated through regulatory requirements.
- Guidelines – Measures that are not required to be implemented for the proposed project but are advised or strongly encouraged.
- Standards – Defined as mandatory requirements that would be required to be implemented for the proposed project.

NASA will review and consider for approval the Master Plan and Development Guidelines as part of the project.<sup>19</sup> Upon completion of the NEPA process, the specifics regarding each building's architectural design and configuration within the Project Site will be reviewed for conformance and approval through NASA's NRP Design Review Board process (pursuant to APR 8822.1). Overall project approval consistent with the procedures outlined in APR 8829.1 is required before NASA will issue any permits for construction for the proposed project.

Although the CEQA Proposed Project would not obscure the most important views within the NAS Sunnyvale Historic District, it would still introduce large building masses into the historic district's setting where none existed previously. The project design remains at a conceptual stage, and the

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<sup>19</sup> Upon issuance of the Record of Decision for the proposed action, the Master Plan, Development Guidelines, Environmental Issues Management Plan, Transportation Demand Management Plan, and other Project Site-specific documents will apply to the Project Site.

architectural character of new buildings in the Project Site has not yet been developed. However, the Master Plan and Development Guidelines provide standards that are intended to promote architectural compatibility with the historic district. In addition, Mitigation Measure CUL-2, provided in Section 3.5, *Cultural Resources* of the joint EIR/EIS, would establish a process through which the proposed project design is developed to be as architecturally compatible with the NAS Sunnyvale Historic District as feasible while also meeting project objectives.

With implementation of the Master Plan and the Development Guidelines, the architectural character of the CEQA Proposed Project would adhere to the guiding principles, including reflecting a sense of place and identity unique to the Project Site while complementing the historic buildings in the area such as those in Shenandoah Plaza, NAS Sunnyvale Historic District, and Hangar One. Building heights would respect the heights of existing buildings by being lower, allowing the unique skyline of NASA ARC to remain intact. The buildings at the Project Site would provide the contemporary feel of a new development in an urban research district, with façades that would be articulated to convey a sense of human scale. Building massing, materials, and colors would be designed and selected to minimize the appearance of building bulk and mass in order to avoid visual clutter. As discussed above, mechanical equipment on top of the proposed buildings could be visible from surrounding areas, including Shenandoah Plaza, above intervening structures and vegetation. However, with implementation of the Development Guidelines, mechanical equipment and rooftop appurtenances would be screened from view from public streets, with a limited number of minor protrusions allowed for exhaust fans and other small appurtenances. The shape and massing of the mechanical penthouse enclosures would be designed as part of the whole building and would create a balanced composition with the whole building mass. Therefore, the CEQA Proposed Project would not conflict with applicable land use and other regulations governing scenic quality.

### **CEQA Proposed Project No Student/Faculty Housing Variant (NEPA Build Alternative 1 No Student/Faculty Housing Sub-Alternative)**

The CEQA Proposed Project with the Variant would not change the basic characteristics of the CEQA Proposed Project. The Variant would replace the 130,000 square feet of Student/Faculty Housing in Subarea 6 with 130,000 square feet of Research and Office Uses. However, the Variant would result in the same maximum building heights, building design, open space and landscaping, and streetscape improvements proposed and evaluated under the CEQA Proposed Project. The CEQA Proposed Project with the Variant would be considered an employment-center project and would still be consistent with SB 743. In addition, the same Development Guidelines and Standards would apply. The Variant would undergo project design review by NASA's Design Review Board per APR 8822.1, ensuring that final designs would comply with applicable development and design standards. Therefore, the analysis for the CEQA Proposed Project would apply to the CEQA Proposed Project with the Variant.

### **CEQA Reduced Density Alternative (NEPA Build Alternative 2)**

The CEQA Reduced Density Alternative would not change the basic characteristics of the CEQA Proposed Project. The CEQA Reduced Density Alternative would result in the same maximum building heights, building design, open space and landscaping, and streetscape improvements that are proposed and evaluated under the CEQA Proposed Project. The primary differences between the CEQA Proposed Project and CEQA Reduced Density Alternative would be the number of internal floors

and internal floor-to-floor heights, which would not affect the building height maximums. The CEQA Reduced Density Alternative would provide the same amount of publicly accessible open space (a minimum of 10 acres) and result in the same number of trees at the Project Site (approximately 1,301 trees) as under the CEQA Proposed Project. In addition, the same Development Guidelines and Standards would apply. The CEQA Reduced Density Alternative would undergo project design review by NASA's Design Review Board per APR 8822.1, ensuring that final designs would comply with applicable development and design standards. Therefore, the analysis for the CEQA Proposed Project would apply to the CEQA Reduced Density Alternative.

### **CEQA Reduced Density Alternative No Student/Faculty Housing Variant (NEPA Build Alternative 2 No Student/Faculty Housing Sub-Alternative)**

The CEQA Reduced Density Alternative with the Variant would not change the basic characteristics of the CEQA Proposed Project. The Variant would replace the 130,000 square feet of Student/Faculty Housing in Subarea 6 with 130,000 square feet of Research and Office Uses. However, the Variant would result in the same maximum building heights, building design, open space and landscaping, and streetscape improvements proposed and evaluated under the CEQA Proposed Project. The CEQA Reduced Density Alternative with the Variant would be considered an employment-center project and would still be consistent with SB 743. The primary differences between the CEQA Proposed Project and CEQA Reduced Density Alternative with the Variant would be the types of uses and the number of internal floors, which would not affect the building height maximums or the visual quality at the Project Site. In addition, the same Development Guidelines and Standards would apply. The CEQA Reduced Density Alternative with the Variant would undergo project design review by the NASA's Design Review Board per APR 8822.1, ensuring that final designs would comply with applicable development and design standards. Therefore, the analysis for the CEQA Proposed Project would apply to the CEQA Reduced Density Alternative with the Variant.

## **New Sources of Light and Glare**

### **CEQA Proposed Project (NEPA Build Alternative 1)**

#### **Construction**

During project construction, glare would be produced from sources such as reflective surfaces on construction vehicles. However, these sources would be present only temporarily (i.e., during construction). Glare would depend on the time of day. It would also be transient and distributed as vehicles move through the Project Site. Work conducted during evenings and on weekends would be limited. Most construction would occur from 7:00 a.m. to 7:00 p.m. Pacific Time on weekdays. Limited nighttime construction could be required for concrete pours and off-site construction in roadways for utility installation. However, the concrete pours would be limited in number and would generally occur months apart from each other. Off-site utility work may occur outside of normal business hours and on weekends, per NASA requirements. It is anticipated that nighttime or weekend construction could be required in limited instances for concrete pours and utility work. In general, this would include approximately 5 days of nighttime construction per building for concrete foundation pours and approximately 10 days of nighttime construction per utility system. Low-level safety lighting may be needed for construction site security. However, the safety lighting would be temporary during the duration of nighttime construction only. Therefore, construction of the CEQA

Proposed Project would not create a new permanent source of substantial light or glare that would adversely affect daytime or nighttime views in the area.

## Operation

**Lighting.** Lighting throughout the Project Site would be provided for safety, security, and wayfinding purposes. It would illuminate roadways, sidewalks, and primary pathways while minimizing light pollution. Specifically, lighting would be incorporated along streets on the exterior of the Project Site (e.g., Wescoat Road, Cody Road, Girard Road) as well as throughout the interior of the Project Site between the proposed buildings. In addition, primary path lighting would be provided along the Promenade and around the Central Green, with secondary path lighting being incorporated through the Central Green and Hangar Commons. Lighting in parking structures would be screened and controlled so as not to disturb surrounding properties and roadways while ensuring adequate public security.

Light fixtures incorporated throughout the Project Site would use efficient technologies, such as LEDs, and adhere to the levels of the Illumination Engineering Society of North America. In addition, light would be directed away from adjacent properties by using directional lighting with baffles, and non-reflective tinting on windows, among other mechanisms, would also be incorporated. Furthermore, light fixtures would comply with the dark sky principles outlined by the International Dark-Sky Association and would incorporate shielding to restrict light pollution beyond a 90-degree angle. Because CUP and WRF operations would be located within enclosed buildings in Subareas 4 and 6, respectively, it is not anticipated that lighting associated with these uses would be visible from surrounding areas.

Upon completion of the NEPA process, the specifics regarding each building's architectural design and configuration within the Project Site will be reviewed for conformance and approval through NASA's NRP Design Review Board process (pursuant to APR 8822.1). The following proposed Standards in the Development Guidelines, which would be required to be implemented for the proposed project, include requirements for site lighting:

- Site elements, including streetlights, pedestrian poles, bollards, litter bins, bicycle racks, benches, special features, etc., shall maintain a cohesive identity that complements the overall landscape and architectural material palettes and avoids false historicism.
- Lighting shall be provided at the minimum levels required by the Illumination Engineering Society of North America (IESNA) lighting guidelines and relevant local code requirements, using no more light than is necessary.
- Minimize impacts of necessary lighting by choosing low-glare sources.
- Lighting standards and fixtures shall use efficient lighting technologies, including, but not limited, to LED technology.
- Direct lighting away from native habitats by employing directional lighting with baffles, non-reflective tinting on windows, and other mechanisms.
- Lighting fixtures shall comply with dark sky principles outlined by the International Dark-Sky Association (IDA), which involve incorporating shielding to restrict light emission beyond a 90-degree angle.

- Lighting design and fixtures shall follow a clear hierarchy and be in scale with the context and surroundings.

Moffett CLUP Policy G-7 states that all new exterior lighting shall be designed so as to create no interference with aircraft operations and that only the intended area is illuminated. In order to reduce lighting at the Project Site and offsite spillage, the lighting performance standards set by Leadership in Energy and Environmental Design (LEED) could be followed through a combination of adherence to lighting specifications, shielding techniques, automatic lighting controls, and light pollution considerations. Energy-efficient site lighting and designs that meet IESNA lighting density and control standards would attempt to minimize light pollution. Furthermore, the proposed buildings within each of the subareas would incorporate light spill-out zones along the building frontages, which would include patios and terraces with seating areas that would be fully or partially covered by building articulation, trellises, or tree canopies. Therefore, operation of the CEQA Proposed Project would not create a new source of substantial light that would adversely affect daytime or nighttime views in the area or impact operations of the adjacent airfield.

**Glare.** Glare is caused by light reflected from pavement, vehicles, and building materials, such as reflective glass and polished surfaces. During the daytime, the amount of glare depends on the intensity and direction of the sunlight. Daytime glare can create hazards for individuals traveling along nearby roadways. Moffett CLUP Policy G-7 states that all new exterior lighting shall be designed so as to create no interference with aircraft operations and requires off-site glare to be fully controlled.

As discussed above, building façades would be designed with depth-of-shading elements, fritted glass, and solid materials, as outlined in the standards set forth in the Development Guidelines, and comply with CALGreen Non-Residential Voluntary Measure A5.107, Bird-Friendly Building Design (see Section 2.3.1, *Proposed Berkeley Space Center Master Plan and Proposed Berkeley Space Center Development Guidelines*). The CALGreen measure includes design requirements related to glazing, slats, screens, netting, and louvers to minimize the risk of birds colliding with proposed buildings.<sup>20</sup> Furthermore, the proposed buildings within each of the subareas would incorporate glare spill-out zones along the building frontages, which would include patios and terraces with seating areas that would be fully or partially covered by building articulation, trellises, or tree canopies. Therefore, operation of the CEQA Proposed Project would not create a new source of substantial glare that would adversely affect daytime or nighttime views in the area or impact operations of the adjacent airfield.

### **CEQA Proposed Project No Student/Faculty Housing Variant (NEPA Build Alternative 1 No Student/Faculty Housing Sub-Alternative)**

The CEQA Proposed Project with the Variant would not change the basic characteristics of the CEQA Proposed Project. The Variant would replace the 130,000 square feet of Student/Faculty Housing in Subarea 6 with 130,000 square feet of Research and Office Uses. However, the Variant would result in the same building and lighting designs proposed and evaluated under the CEQA Proposed Project.

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<sup>20</sup> There are several other design requirements with which the project must comply. For example, the project would comply with applicable codes and regulations outlined in APD 8829.1, including, but not limited to, California Code of Regulations Title 24, the National Fire Protection Association's National Fire Codes, NASA Research Park Design Review Program, and 14 CFR Part 1216, NASA Environmental Quality.

In addition, the same Development Guidelines would apply. The Variant would undergo project design review by NASA's Design Review Board per APR 8822.1, ensuring that final designs would comply with applicable light and glare standards in the Development Guidelines. Therefore, the analysis for the CEQA Proposed Project would apply to the CEQA Proposed Project with the Variant.

## **CEQA Reduced Density Alternative (NEPA Build Alternative 2)**

The CEQA Reduced Density Alternative would not change the basic characteristics of the CEQA Proposed Project. The CEQA Reduced Density Alternative would result in the same building and lighting designs proposed and evaluated under the CEQA Proposed Project. The primary differences between the CEQA Proposed Project and CEQA Reduced Density Alternative would be the number of internal floors and internal floor-to-floor heights, which would not change the proposed lighting. The same Development Guidelines would apply. The Variant would undergo project design review by NASA's Design Review Board per APR 8822.1, ensuring that final designs would comply with applicable light and glare standards in the Development Guidelines. Therefore, the analysis for the CEQA Proposed Project would apply to the CEQA Reduced Density Alternative.

## **CEQA Reduced Density Alternative No Student/Faculty Housing Variant (NEPA Build Alternative 2 No Student/Faculty Housing Sub-Alternative)**

The CEQA Reduced Density Alternative with the Variant would not change the basic characteristics of the CEQA Proposed Project. The Variant would replace the 130,000 square feet of Student/Faculty Housing in Subarea 6 with 130,000 square feet of Research and Office Uses. However, the Variant would result in the same maximum building heights, building design, open space and landscaping, and streetscape improvements proposed and evaluated under the CEQA Proposed Project. The primary differences between the CEQA Proposed Project and CEQA Reduced Density Alternative with the Variant would be the types of uses and the number of internal floors, which would not change the proposed lighting. The same Development Guidelines would apply. The Variant would undergo project design review by NASA's Design Review Board per APR 8822.1, ensuring that final designs would comply with applicable light and glare standards and the Development Guidelines. Therefore, the analysis for the CEQA Proposed Project would apply to the CEQA Reduced Density Alternative with the Variant.

## **Cumulative Impacts**

The cumulative projects within NASA ARC are described in Section 3.6, *Approach to Cumulative Impact Analysis*, in Chapter 3, *Affected Environment/Environmental Setting and Environmental Impacts*, and shown in Figure 3.1-1 in the joint EIR/EIS. The geographic context for a cumulative assessment of the visual character or quality of the surrounding area considers past, present, and reasonably foreseeable future projects in the immediate vicinity of the Project Site. As explained in more detail below, no cumulative projects would combine with the proposed project to degrade visual character or quality.

The view corridors include Wescoat Road, Cody Road, Shenandoah Plaza, areas east of the airfield, and areas south of the Project Site. Within the geographic context described above, the majority of the cumulative projects would not be visible from the Project Site because of the low intensity of the

proposed developments, flat terrain, intervening vegetation and structures, and distance. However, the following cumulative projects could be visible from certain viewpoint locations:

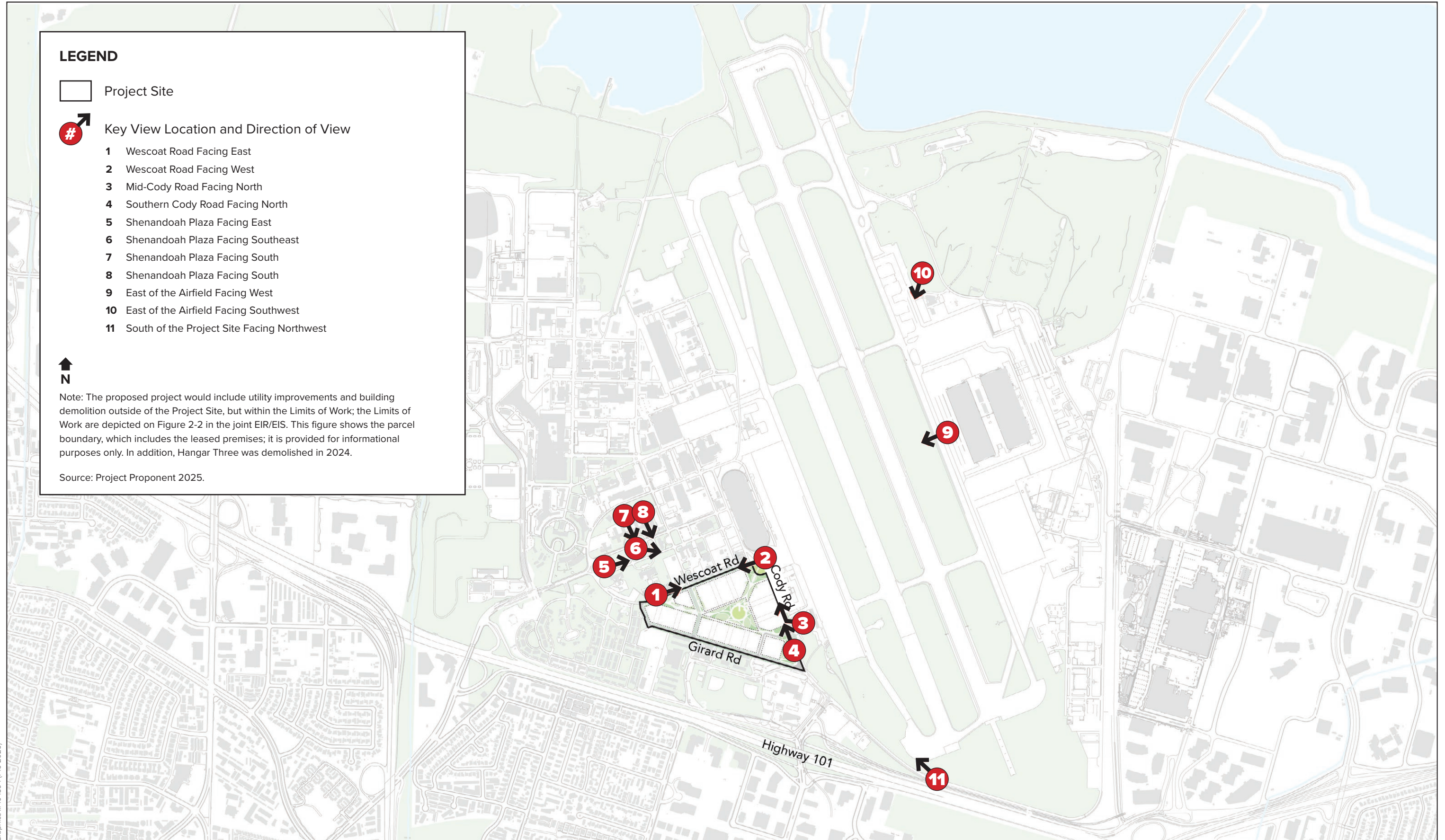
- United States Geological Survey (USGS) Lab B800, in the NAS Sunnyvale Historic District (complete)
- USGS B19 Relocation, in the NAS Sunnyvale Historic District (complete)
- Planetary Ventures Moffett Federal Airfield (PV MFA) Hangar One Reskinning (complete)
- PV MFA Hangar Three Remediation (complete)<sup>21</sup>
- PV MFA Bus Operations and Maintenance Facility Improvements (complete)

The visual character of the other reasonably foreseeable project buildings would be mostly consistent with existing development surrounding the site and would most likely not stand out as being visually obtrusive from the standpoint of architectural detailing, coloring, and surface treatments. The reasonably foreseeable projects in NASA ARC would be required to adhere to the NADP, while projects in neighboring jurisdictions would be required to adhere to the municipal codes and general plans of those jurisdictions. The reasonably foreseeable projects would also be required to adhere to these governing guidelines, which establish height limits for buildings as well as land coverage, density, setback, and design. Therefore, the other projects would not be expected to change the quality of the area in a way that would be incompatible with the existing visual character. As described above, the CEQA Proposed Project or CEQA Reduced Density Alternative would not degrade the visual character or quality of the Project Site or its surroundings and would not conflict with regulations governing scenic quality. Although other cumulative development could increase building height, mass, and bulk compared to existing conditions, all proposed development would be required to adhere to their respective design controls and consider the existing environment and views.

The other cumulative development in the area could include new illumination sources that would increase nighttime lighting, ambient light glow, and glare levels (e.g. from interior and exterior building lighting, street and pedestrian pathway lighting, parking lot lighting, and vehicle headlights). Reflective building surfaces or buildings that include large expanses of windows would also increase glare. Other cumulative projects could involve redevelopment or infill of urban sites that already generate light and glare or receive light and glare from surrounding existing sources. Therefore, these buildings are not anticipated to be large enough in scale to result in a substantial increase in nighttime lighting and glare conditions in the area. None of the other proposed projects in the area are large enough to contribute to a cumulative lighting or glare impact that would extend to the Project Site. In addition, lighting for the cumulative projects would be required to comply with CALGreen and lighting guidelines in the respective jurisdictions.

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<sup>21</sup> Hangar Three was demolished in 2024.



**LEGEND**

Project Site

Key View Location and Direction of View

- 1 Wescoat Road Facing East
- 2 Wescoat Road Facing West
- 3 Mid-Cody Road Facing North
- 4 Southern Cody Road Facing North
- 5 Shenandoah Plaza Facing East
- 6 Shenandoah Plaza Facing Southeast
- 7 Shenandoah Plaza Facing South
- 8 Shenandoah Plaza Facing South
- 9 East of the Airfield Facing West
- 10 East of the Airfield Facing Southwest
- 11 South of the Project Site Facing Northwest



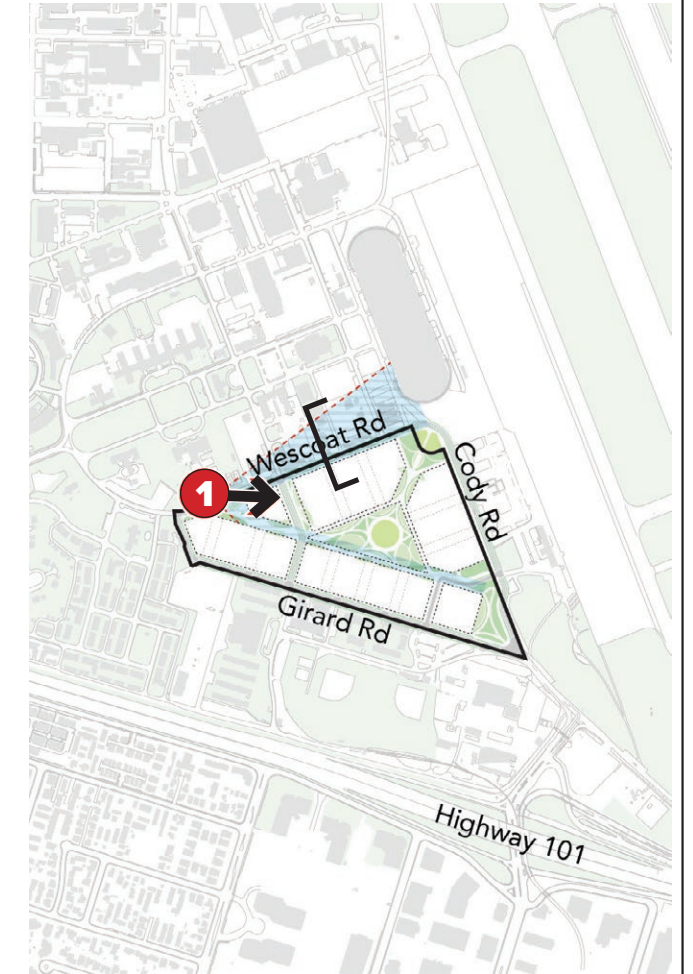
Note: The proposed project would include utility improvements and building demolition outside of the Project Site, but within the Limits of Work; the Limits of Work are depicted on Figure 2-2 in the joint EIR/EIS. This figure shows the parcel boundary, which includes the leased premises; it is provided for informational purposes only. In addition, Hangar Three was demolished in 2024.

Source: Project Proponent 2025.

**Figure 1**  
**Visual Simulations for the CEQA Proposed Project and CEQA Reduced Density Alternative**  
 Berkeley Space Center at NASA Research Park



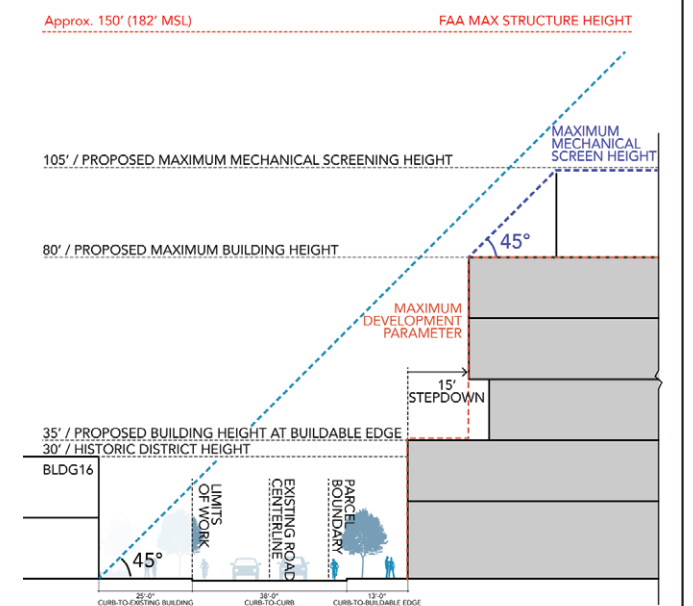
a. Existing



Key Plan



b. Proposed



Wescoat Road Edge Massing Height

Graphics ... 104894 (1-13-2026)

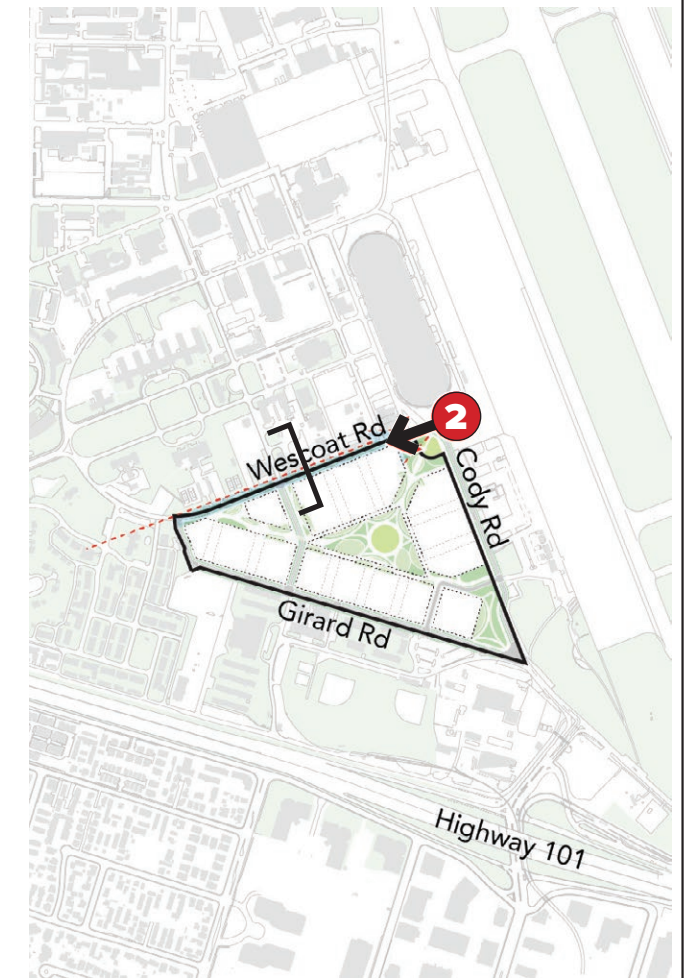


Note: Images are conceptual until after project approval. The visual simulations show an illustrative rendering of representative buildings to convey the overall vision of the CEQA Proposed Project and CEQA Reduced Density Alternative. This is one possible example of the CEQA Proposed Project and CEQA Reduced Density Alternative that would substantially conform to massing, scale, height and other applicable standards (i.e., the maximum mechanical screen height and the Maximum and Minimum Development Parameters). The Maximum Development Parameters (depicted in Figure 2-9 in the joint EIR/EIS) illustrate the conceptual horizontal and vertical dimensions for each Subarea. The CEQA Proposed Project or CEQA Reduced Density Alternative would not be built to the full extent of the Maximum Development Parameters in each Subarea due to square footage and applicable standard limitations. In addition, the proposed mechanical screens and building facades are indicated with the same graphical style in the visual simulations. Furthermore, the proposed project would include utility improvements and building demolition outside of the Project Site, but within the Limits of Work; the Limits of Work are depicted on Figure 2-2 in the joint EIR/EIS. This figure shows the parcel boundary, which includes the leased premises; it is provided for informational purposes only.

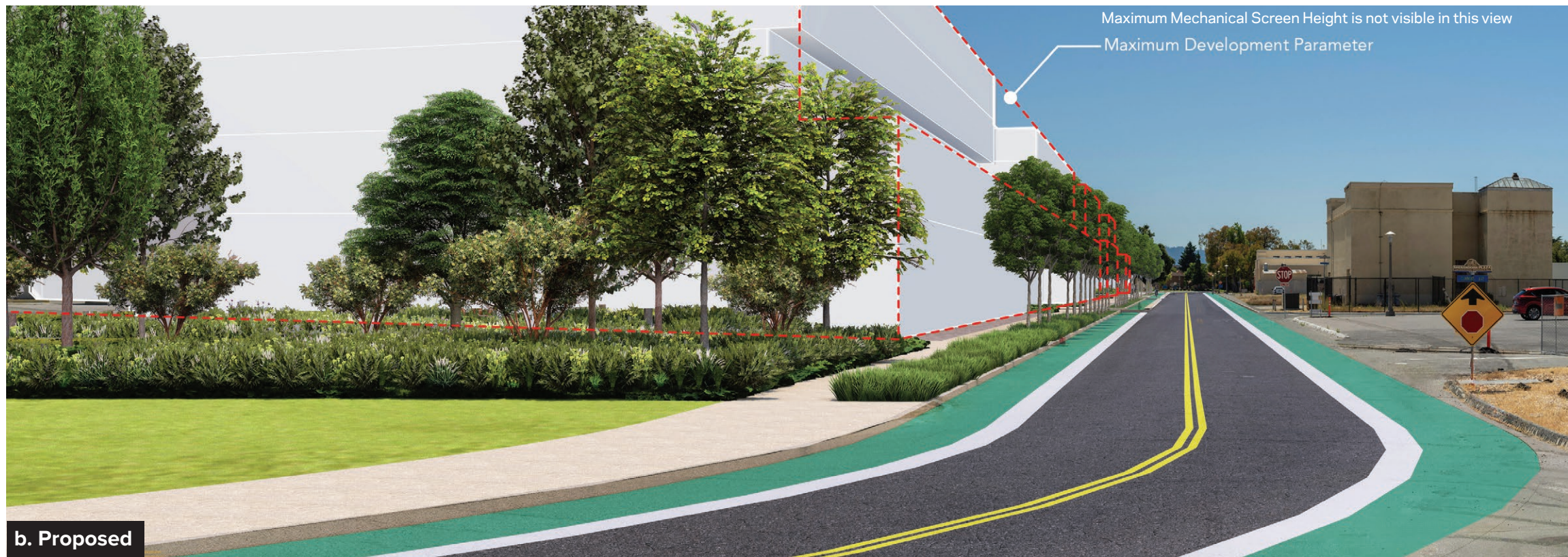
**Figure 2**  
**Viewpoint 1: Wescoat Road Facing East**  
**Berkeley Space Center at NASA Research Park**



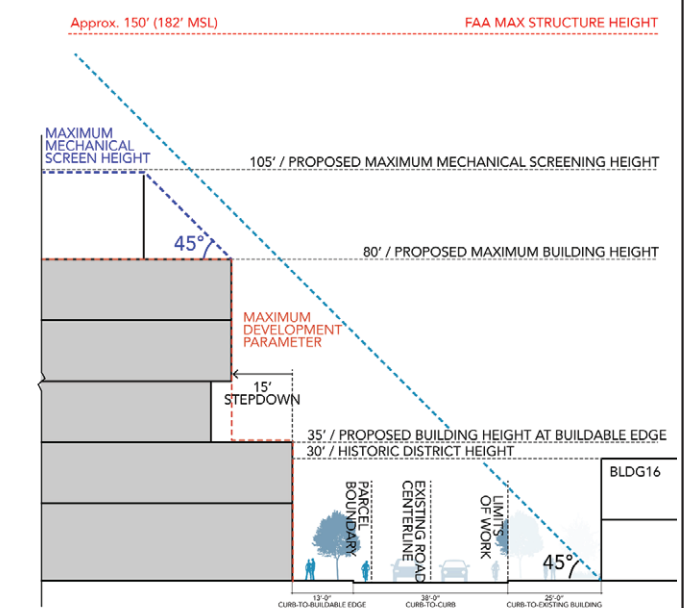
a. Existing



Key Plan



b. Proposed



Westcoat Road Edge Massing Height

Graphics ... 104894 (1-16-2026)

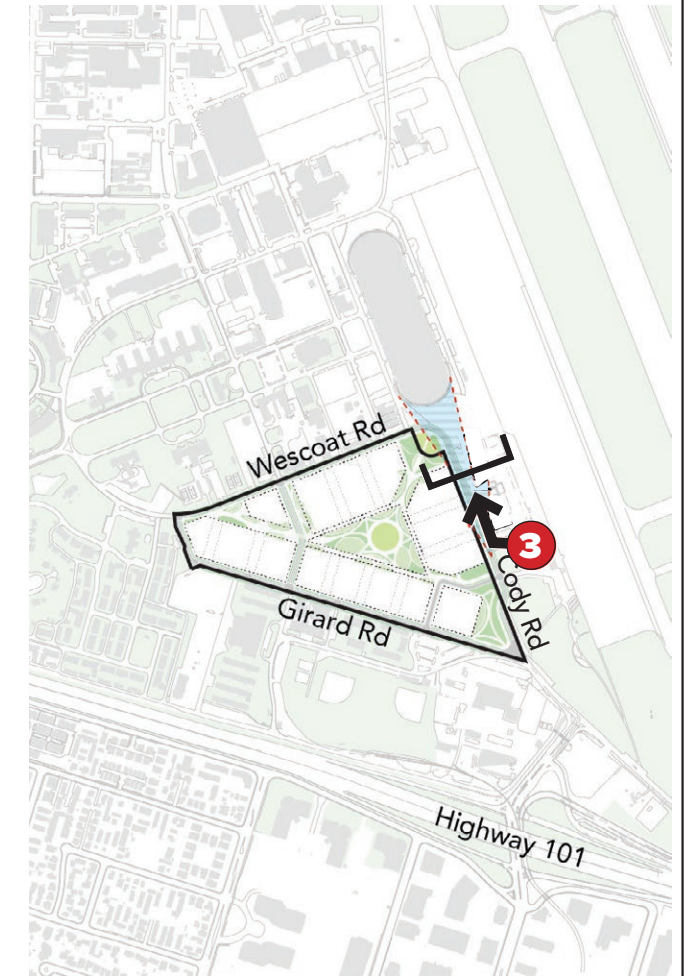


Note: Images are conceptual until after project approval. The visual simulations show an illustrative rendering of representative buildings to convey the overall vision of the CEQA Proposed Project and CEQA Reduced Density Alternative. This is one possible example of the CEQA Proposed Project and CEQA Reduced Density Alternative that would substantially conform to massing, scale, height and other applicable standards (i.e., the maximum mechanical screen height and the Maximum and Minimum Development Parameters). The Maximum Development Parameters (depicted in Figure 2-9 in the joint EIR/EIS) illustrate the conceptual horizontal and vertical dimensions for each Subarea. The CEQA Proposed Project or CEQA Reduced Density Alternative would not be built to the full extent of the Maximum Development Parameters in each Subarea due to square footage and applicable standard limitations. In addition, the proposed mechanical screens and building facades are indicated with the same graphical style in the visual simulations. Furthermore, the proposed project would include utility improvements and building demolition outside of the Project Site, but within the Limits of Work; the Limits of Work are depicted on Figure 2-2 in the joint EIR/EIS. This figure shows the parcel boundary, which includes the leased premises; it is provided for informational purposes only.

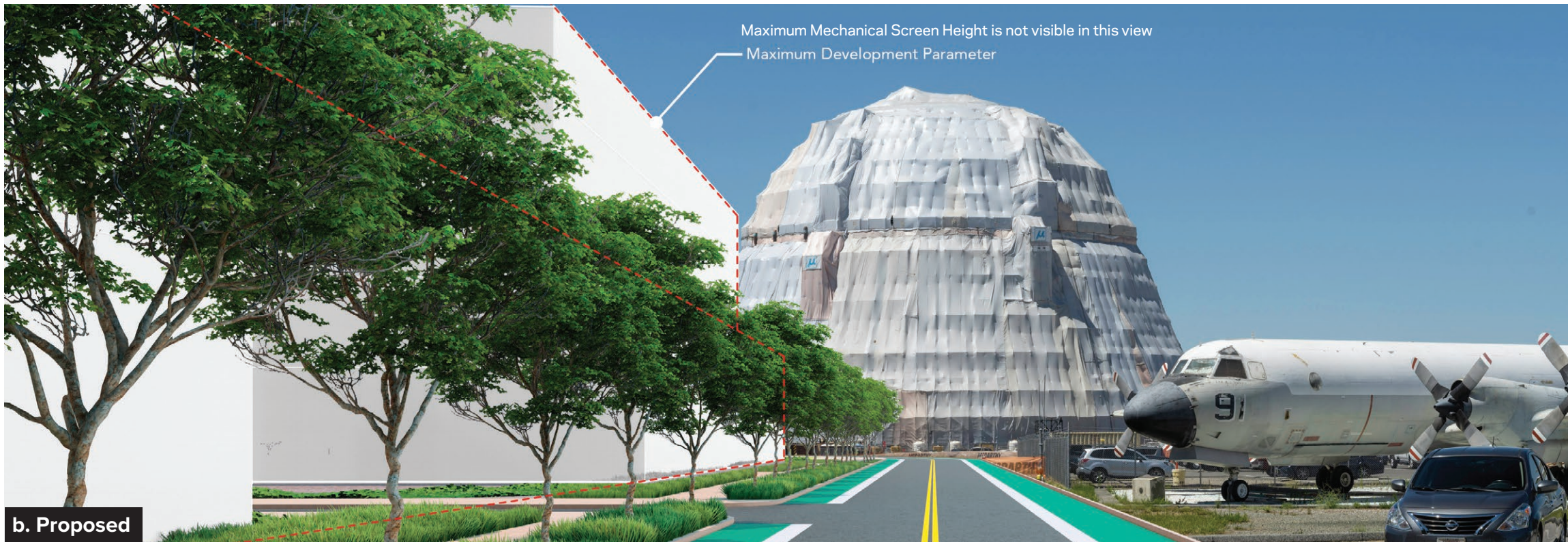
**Figure 3**  
**Viewpoint 2: Westcoat Road Facing West**  
Berkeley Space Center at NASA Research Park



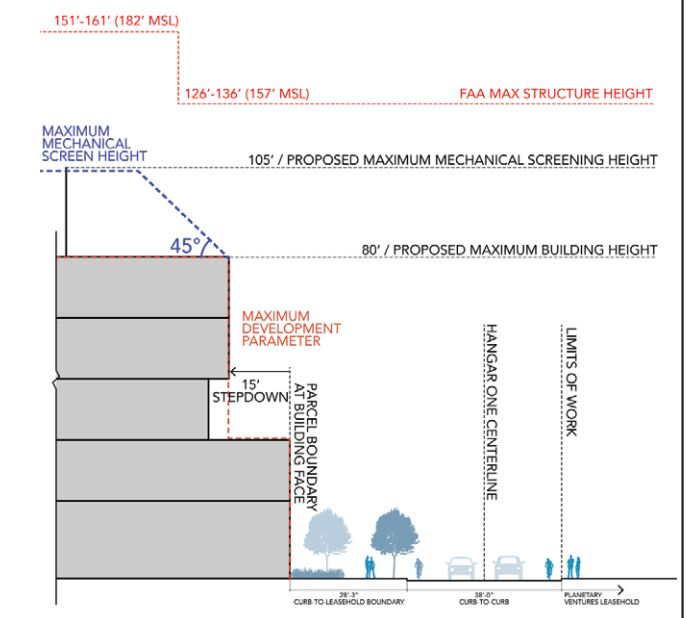
a. Existing



Key Plan



b. Proposed



Cody Road Edge Massing Height

Graphics ... 104894 (1-16-2026)

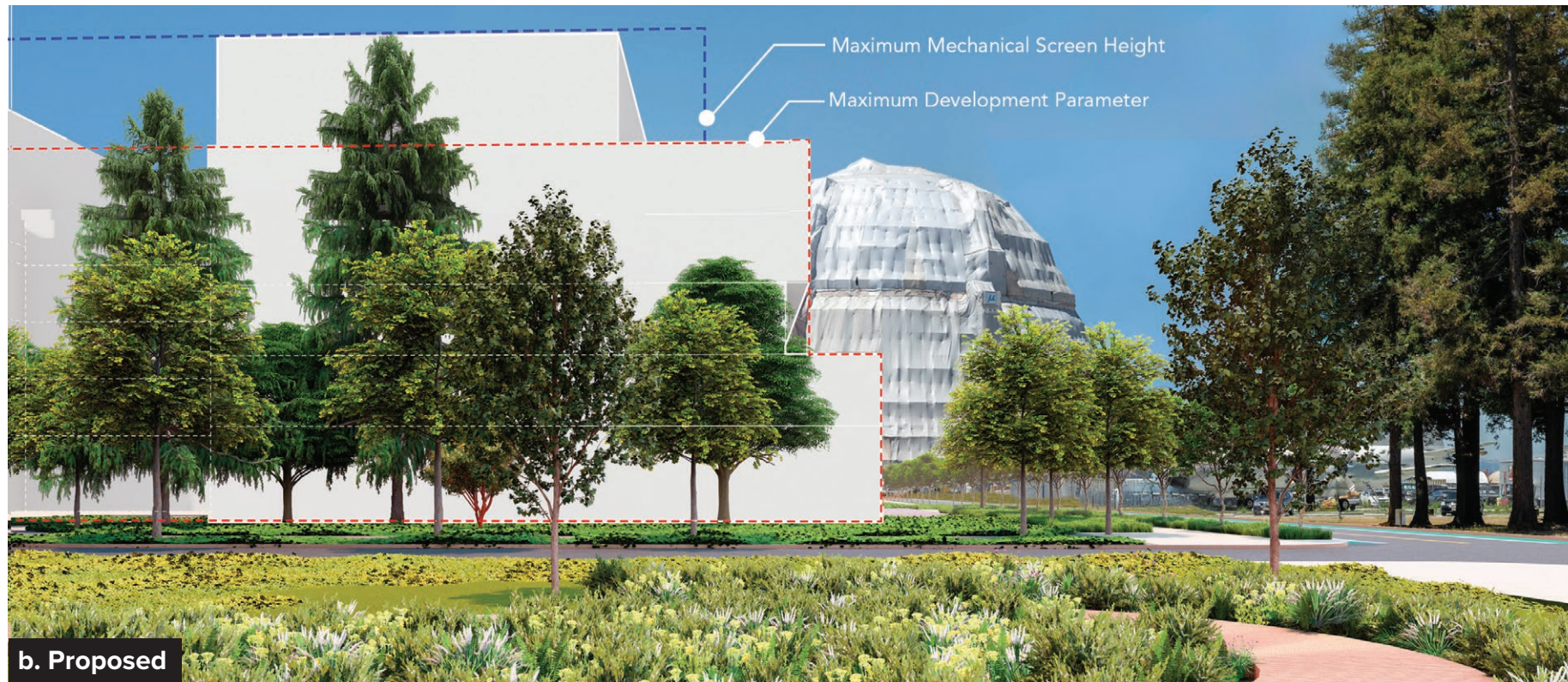


Note: Images are conceptual until after project approval. The visual simulations show an illustrative rendering of representative buildings to convey the overall vision of the CEQA Proposed Project and CEQA Reduced Density Alternative. This is one possible example of the CEQA Proposed Project and CEQA Reduced Density Alternative that would substantially conform to massing, scale, height and other applicable standards (i.e., the maximum mechanical screen height and the Maximum and Minimum Development Parameters). The Maximum Development Parameters (depicted in Figure 2-9 in the joint EIR/EIS) illustrate the conceptual horizontal and vertical dimensions for each Subarea. The CEQA Proposed Project or CEQA Reduced Density Alternative would not be built to the full extent of the Maximum Development Parameters in each Subarea due to square footage and applicable standard limitations. In addition, the proposed mechanical screens and building facades are indicated with the same graphical style in the visual simulations. Furthermore, the proposed project would include utility improvements and building demolition outside of the Project Site, but within the Limits of Work; the Limits of Work are depicted on Figure 2-2 in the joint EIR/EIS. This figure shows the parcel boundary, which includes the leased premises; it is provided for informational purposes only.

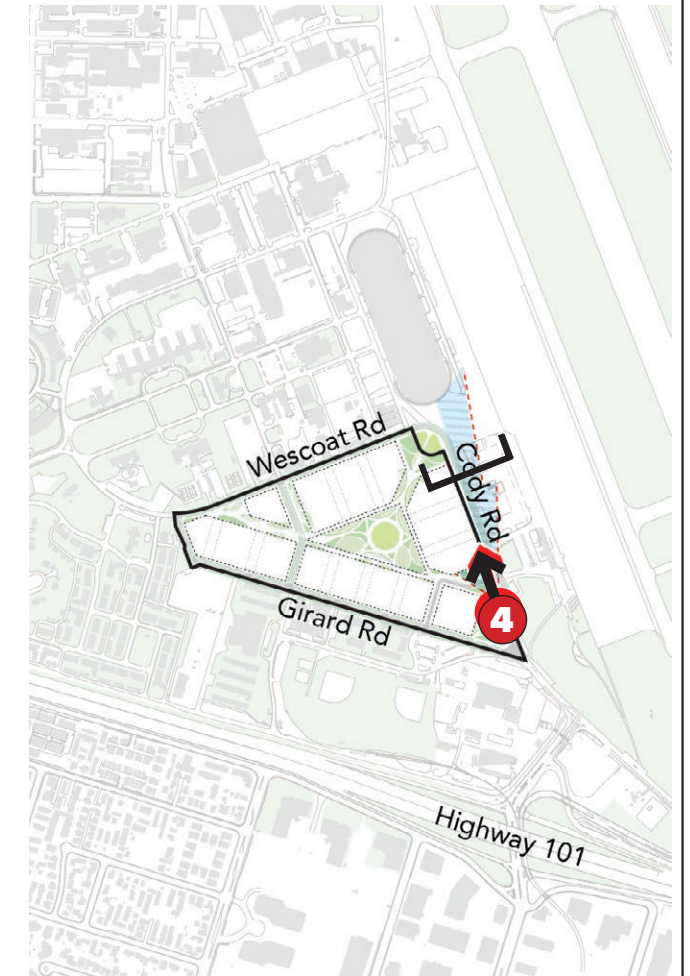
**Figure 4**  
**Viewpoint 3: Mid-Cody Road Facing North**  
**Berkeley Space Center at NASA Research Park**



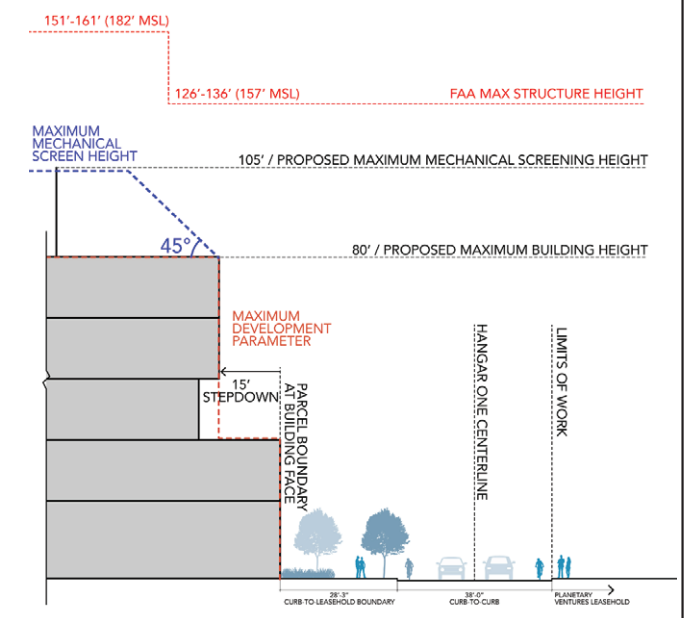
a. Existing



b. Proposed



Key Plan



Cody Road Edge Massing Height

Graphics ... 104894 (1-16-2026)

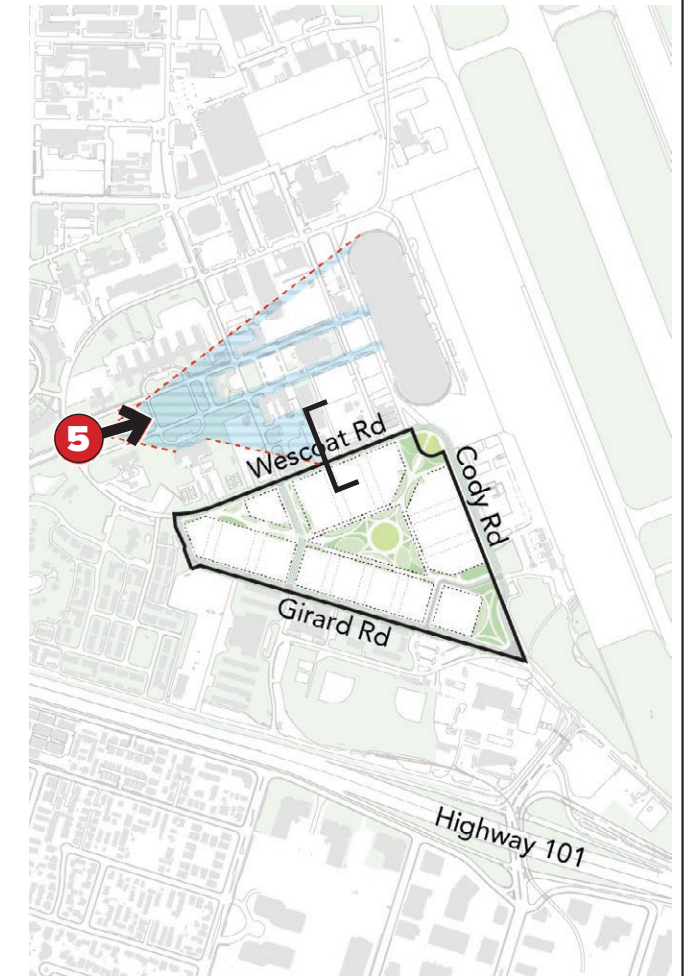


Note: Images are conceptual until after project approval. The visual simulations show an illustrative rendering of representative buildings to convey the overall vision of the CEQA Proposed Project and CEQA Reduced Density Alternative. This is one possible example of the CEQA Proposed Project and CEQA Reduced Density Alternative that would substantially conform to massing, scale, height and other applicable standards (i.e., the maximum mechanical screen height and the Maximum and Minimum Development Parameters). The Maximum Development Parameters (depicted in Figure 2-9 in the joint EIR/EIS) illustrate the conceptual horizontal and vertical dimensions for each Subarea. The CEQA Proposed Project or CEQA Reduced Density Alternative would not be built to the full extent of the Maximum Development Parameters in each Subarea due to square footage and applicable standard limitations. In addition, the proposed mechanical screens and building facades are indicated with the same graphical style in the visual simulations. Furthermore, the proposed project would include utility improvements and building demolition outside of the Project Site, but within the Limits of Work; the Limits of Work are depicted on Figure 2-2 in the joint EIR/EIS. This figure shows the parcel boundary, which includes the leased premises; it is provided for informational purposes only.

**Figure 5**  
**Viewpoint 4: Southern Cody Road Facing North**  
**Berkeley Space Center at NASA Research Park**



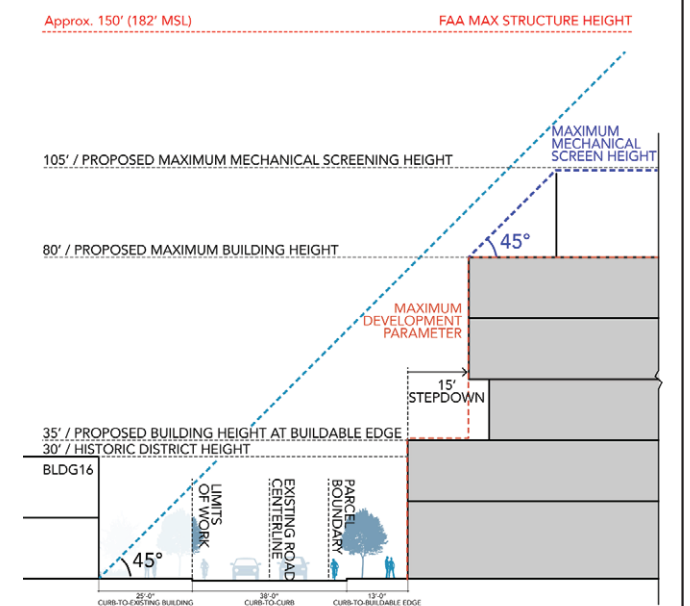
a. Existing



Key Plan



b. Proposed



Wescoat Road Edge Massing Height

Graphics ... 104894 (1-16-2026)

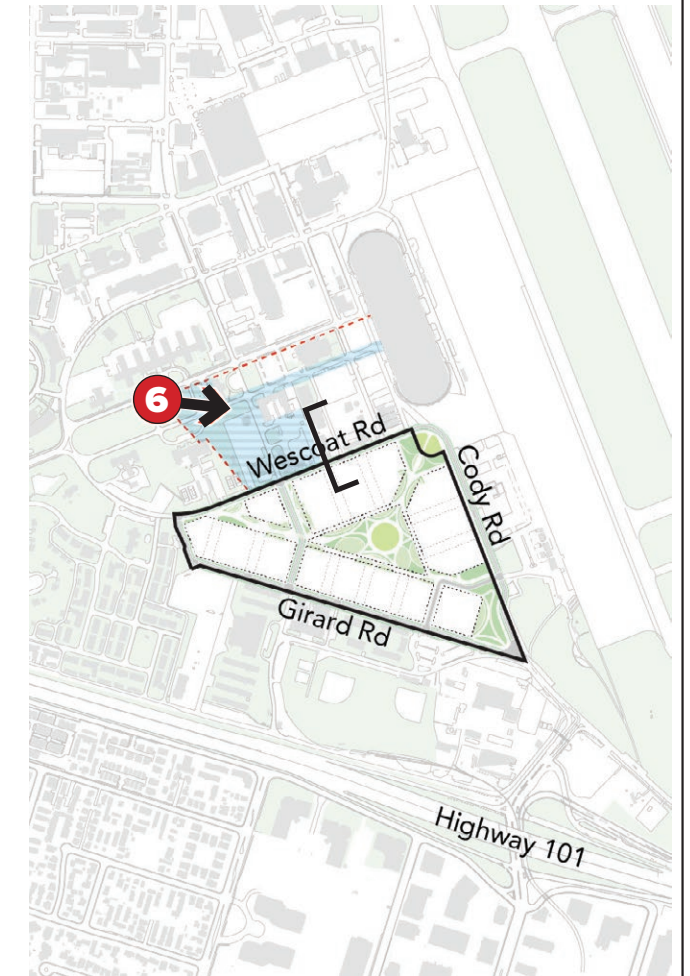


Note: Images are conceptual until after project approval. The visual simulations show an illustrative rendering of representative buildings to convey the overall vision of the CEQA Proposed Project and CEQA Reduced Density Alternative. This is one possible example of the CEQA Proposed Project and CEQA Reduced Density Alternative that would substantially conform to massing, scale, height and other applicable standards (i.e., the maximum mechanical screen height and the Maximum and Minimum Development Parameters). The Maximum Development Parameters (depicted in Figure 2-9 in the joint EIR/EIS) illustrate the conceptual horizontal and vertical dimensions for each Subarea. The CEQA Proposed Project or CEQA Reduced Density Alternative would not be built to the full extent of the Maximum Development Parameters in each Subarea due to square footage and applicable standard limitations. In addition, the proposed mechanical screens and building facades are indicated with the same graphical style in the visual simulations. Furthermore, the proposed project would include utility improvements and building demolition outside of the Project Site, but within the Limits of Work; the Limits of Work are depicted on Figure 2-2 in the joint EIR/EIS. This figure shows the parcel boundary, which includes the leased premises; it is provided for informational purposes only.

**Figure 6**  
**Viewpoint 5: Shenandoah Plaza Facing East**  
**Berkeley Space Center at NASA Research Park**



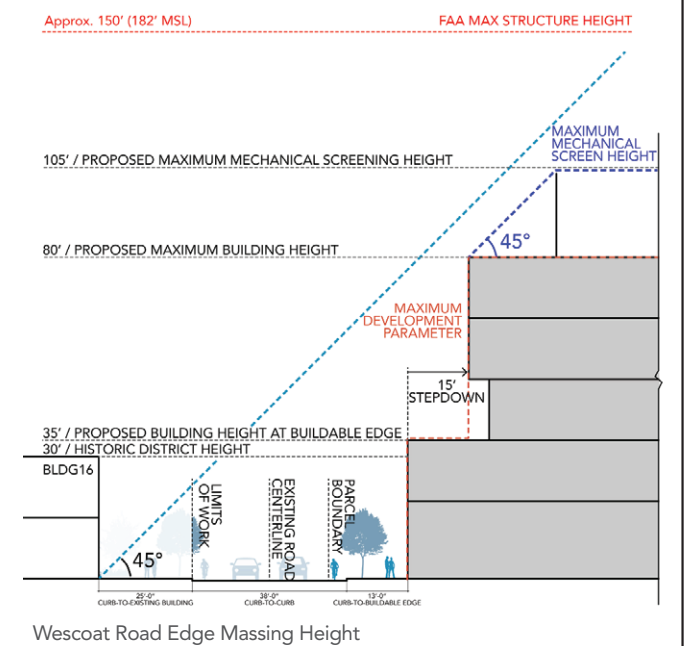
a. Existing



Key Plan



b. Proposed



Wescoat Road Edge Massing Height

Graphics ... 104894 (1-16-2026)

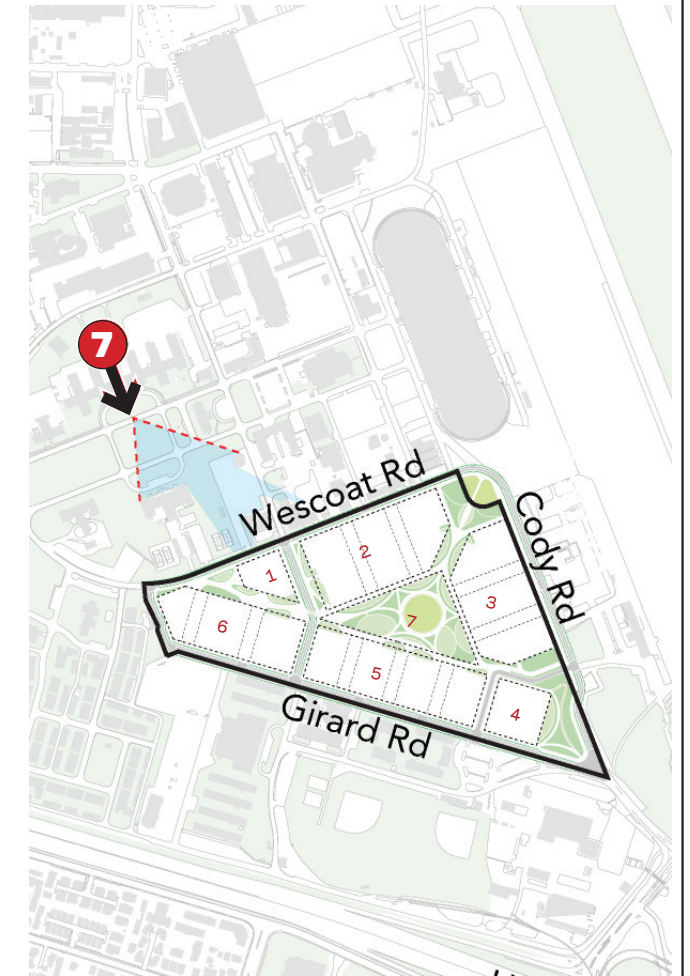


Note: Images are conceptual until after project approval. The visual simulations show an illustrative rendering of representative buildings to convey the overall vision of the CEQA Proposed Project and CEQA Reduced Density Alternative. This is one possible example of the CEQA Proposed Project and CEQA Reduced Density Alternative that would substantially conform to massing, scale, height and other applicable standards (i.e., the maximum mechanical screen height and the Maximum and Minimum Development Parameters). The Maximum Development Parameters (depicted in Figure 2-9 in the joint EIR/EIS) illustrate the conceptual horizontal and vertical dimensions for each Subarea. The CEQA Proposed Project or CEQA Reduced Density Alternative would not be built to the full extent of the Maximum Development Parameters in each Subarea due to square footage and applicable standard limitations. In addition, the proposed mechanical screens and building facades are indicated with the same graphical style in the visual simulations. Furthermore, the proposed project would include utility improvements and building demolition outside of the Project Site, but within the Limits of Work; the Limits of Work are depicted on Figure 2-2 in the joint EIR/EIS. This figure shows the parcel boundary, which includes the leased premises; it is provided for informational purposes only.

**Figure 7**  
**Viewpoint 6: Shenandoah Plaza Facing Southeast**  
**Berkeley Space Center at NASA Research Park**



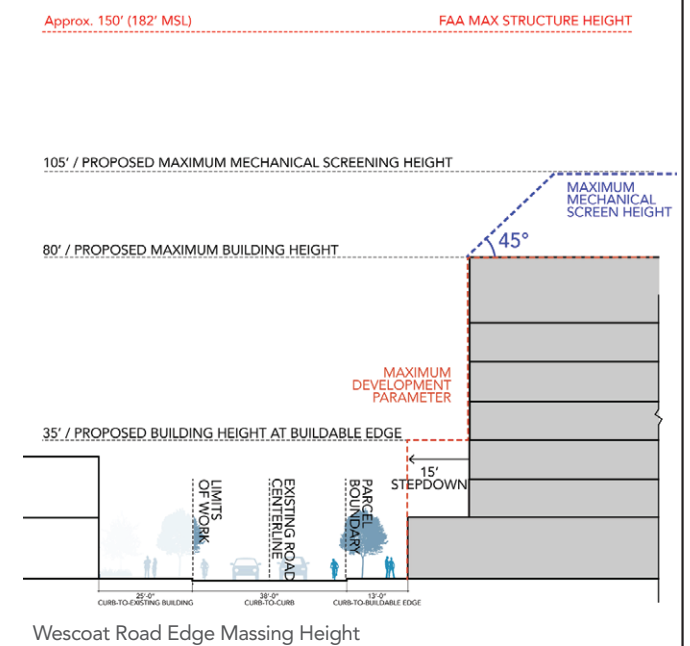
a. Existing



Key Plan



b. Proposed



Wescoat Road Edge Massing Height

← SUBAREA 1 (SUBAREA 6 TYPOLOGY VISIBLE BEYOND) | SUBAREA 6 AND GATEWAY PLAZA →

Graphics ... 104894 (1-16-2026)

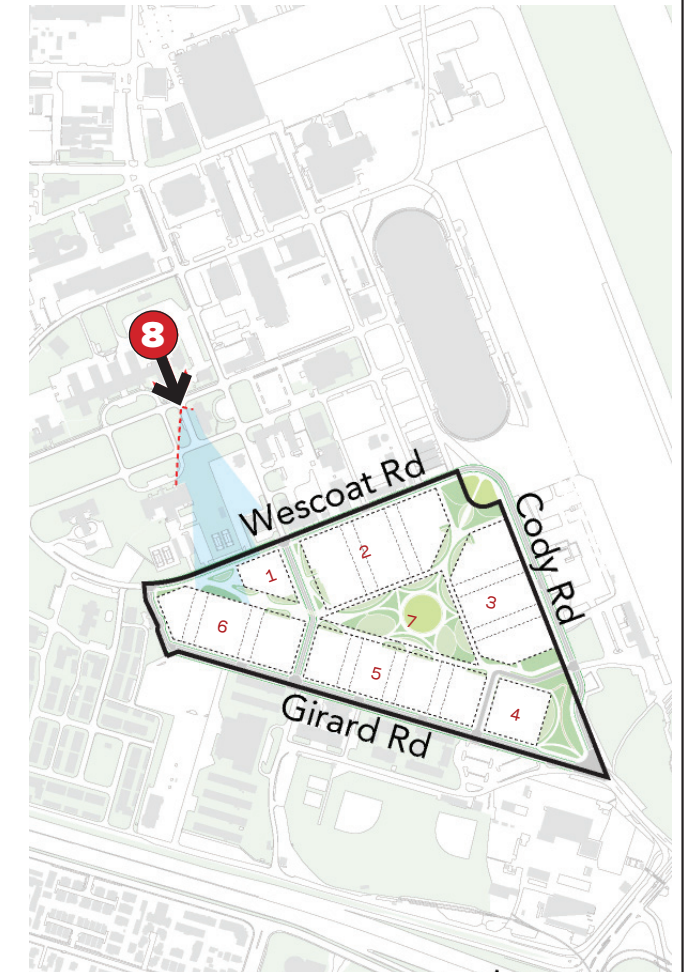


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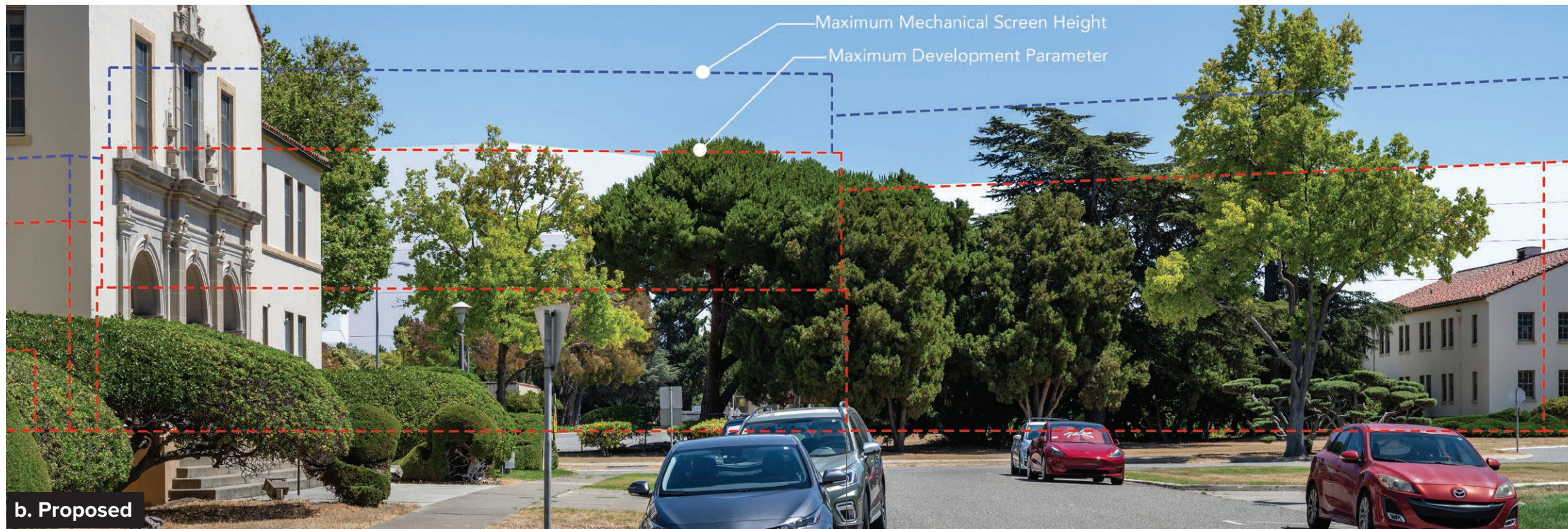
**Figure 8**  
**Viewpoint 7: Shenandoah Plaza Facing South**  
**Berkeley Space Center at NASA Research Park**



a. Existing



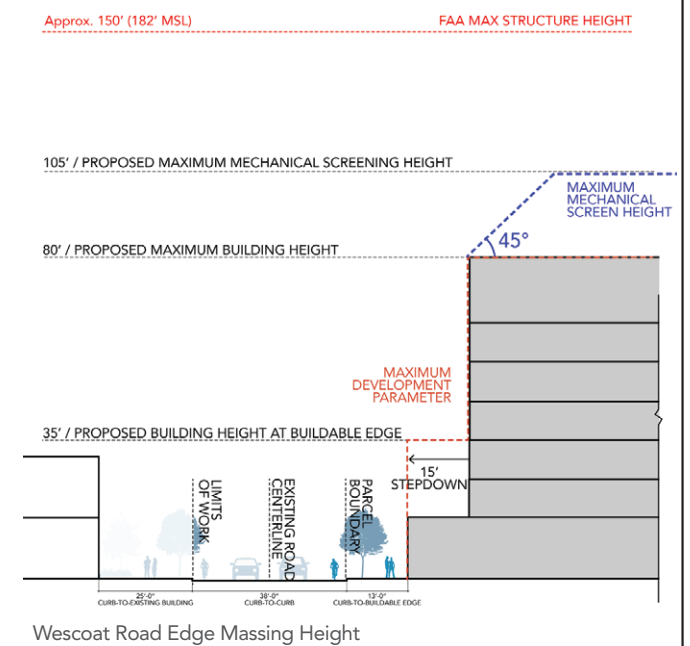
Key Plan



b. Proposed

SUBAREA 1  
(SUBAREA 6 TYPOLOGY VISIBLE BEYOND)

SUBAREA 6 AND GATEWAY PLAZA



Wescoat Road Edge Massing Height

Graphics ... 104894 (1-16-2026)



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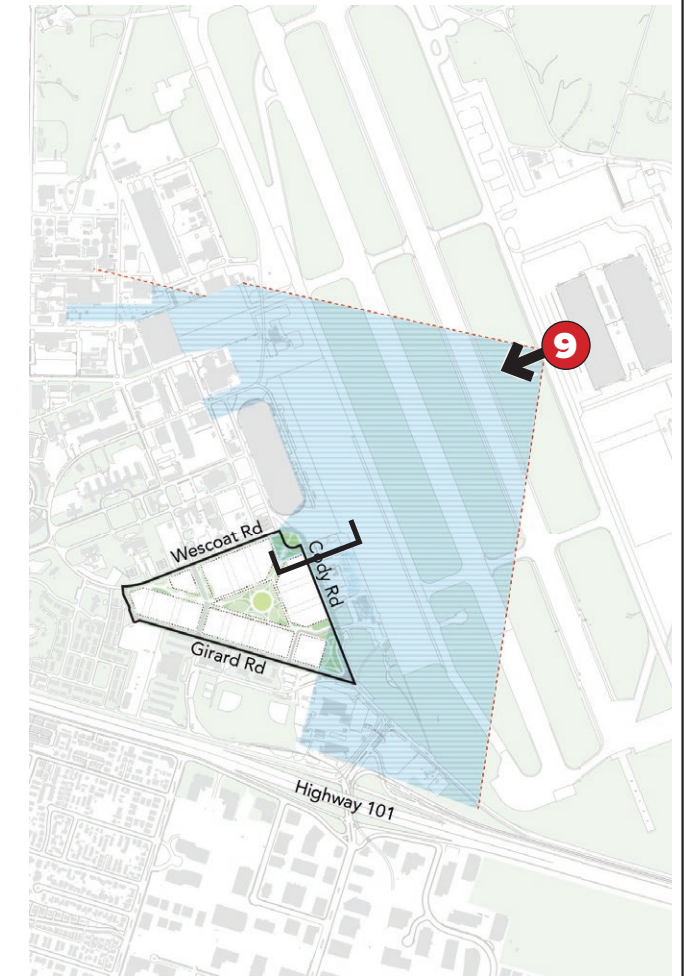
**Figure 9**  
**Viewpoint 8: Shenandoah Plaza Facing South**  
**Berkeley Space Center at NASA Research Park**



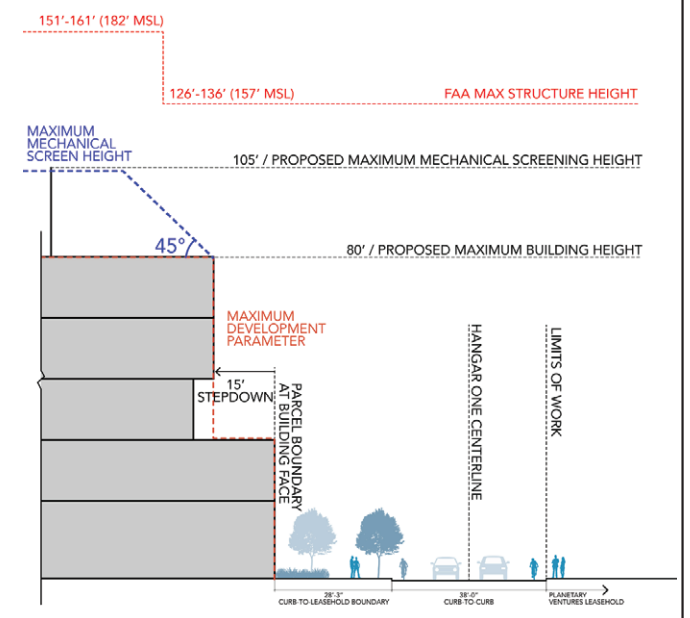
a. Existing



b. Proposed



Key Plan



Cody Road Edge Massing Height

Graphics ... 104894 (1-16-2026)

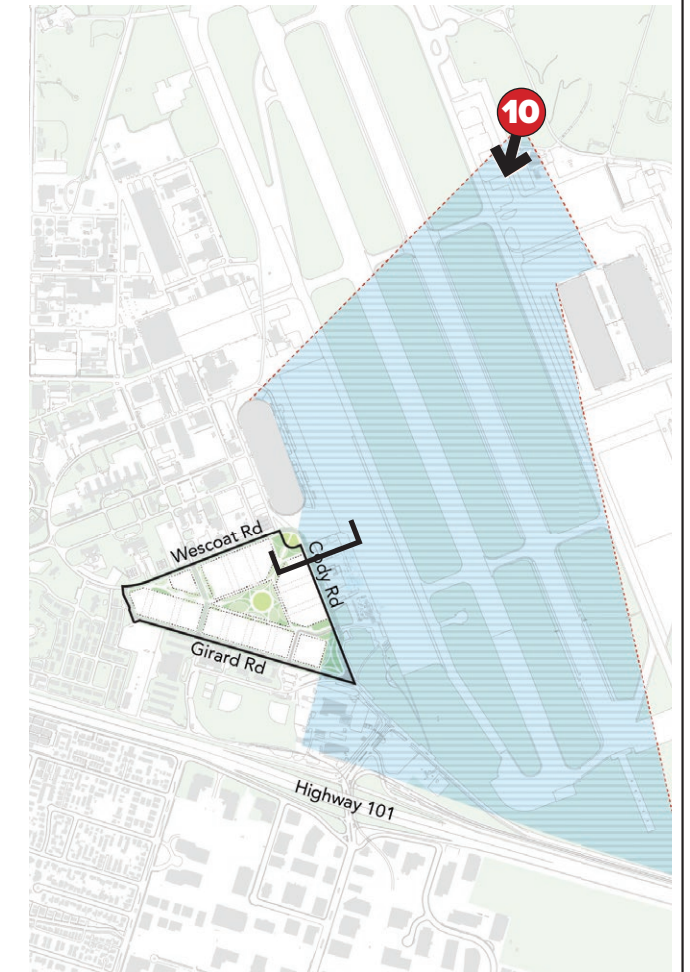


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**Figure 10**  
**Viewpoint 9: East of the Airfield Facing West**  
**Berkeley Space Center at NASA Research Park**



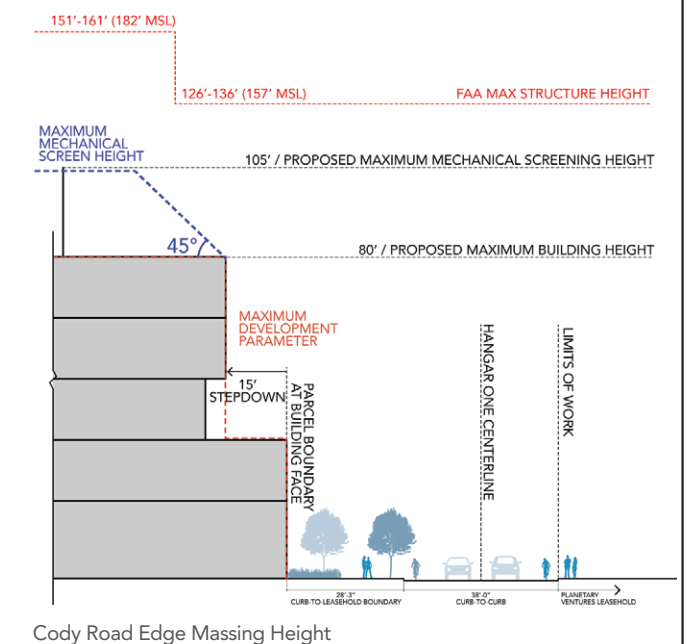
a. Existing



Key Plan



b. Proposed



Cody Road Edge Massing Height

Graphics ... 104894 (1-16-2026)



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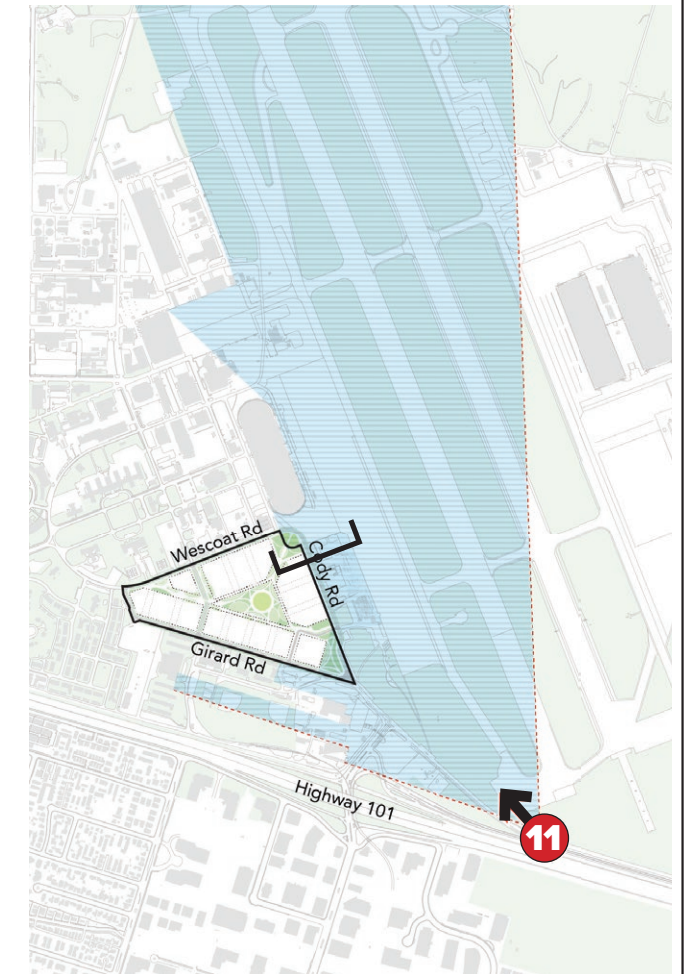
**Figure 11**  
**Viewpoint 10: East of the Airfield Facing Southwest**  
**Berkeley Space Center at NASA Research Park**



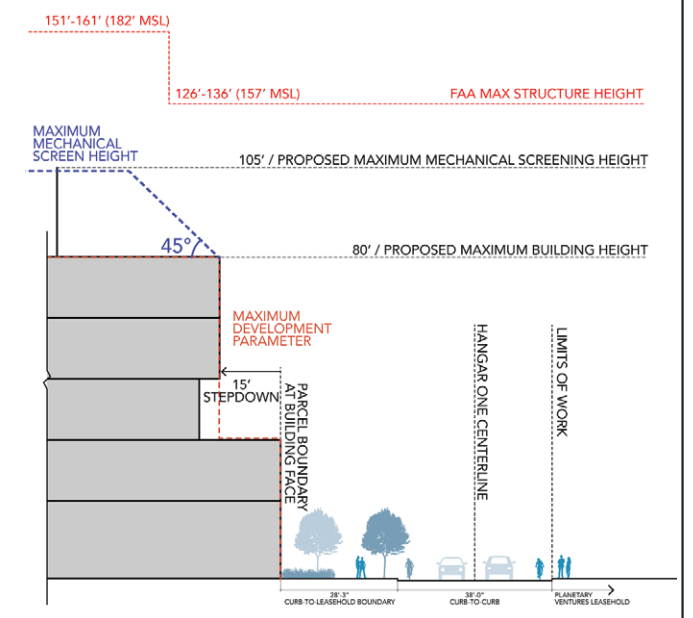
a. Existing



b. Proposed



Key Plan



Cody Road Edge Massing Height

Graphics ... 104894 (1-16-2026)



Note: Images are conceptual until after project approval. The visual simulations show an illustrative rendering of representative buildings to convey the overall vision of the CEQA Proposed Project and CEQA Reduced Density Alternative. This is one possible example of the CEQA Proposed Project and CEQA Reduced Density Alternative that would substantially conform to massing, scale, height and other applicable standards (i.e., the maximum mechanical screen height and the Maximum and Minimum Development Parameters). The Maximum Development Parameters (depicted in Figure 2-9 in the joint EIR/EIS) illustrate the conceptual horizontal and vertical dimensions for each Subarea. The CEQA Proposed Project or CEQA Reduced Density Alternative would not be built to the full extent of the Maximum Development Parameters in each Subarea due to square footage and applicable standard limitations. In addition, the proposed mechanical screens and building facades are indicated with the same graphical style in the visual simulations. Furthermore, the proposed project would include utility improvements and building demolition outside of the Project Site, but within the Limits of Work; the Limits of Work are depicted on Figure 2-2 in the joint EIR/EIS. This figure shows the parcel boundary, which includes the leased premises; it is provided for informational purposes only.

**Figure 12**  
**Viewpoint 11: South of the Project Site Facing Northwest**  
**Berkeley Space Center at NASA Research Park**