

Appendix 3.9-1
Hazardous Material Conditions

22 January 2026

MEMORANDUM

To: Jessica Viramontes (ICF)

From: Michelle K. King, Ph.D. (EKI)
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Subject: Berkeley Space Center at NASA Research Park - Hazardous Material Conditions
(EKI C40103.00)

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).¹ The Project Proponent will require the UC Regents' authorization under the California Environmental Quality Act (CEQA) to proceed with the proposed project, 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.²

The proposed project is located at NASA's Ames Research Center (NASA ARC) on an approximately 39-acre project site (Project Site or Premises³), 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), as depicted on Figure 1.

The Premises is located within the Middlefield-Ellis-Whisman (MEW) Superfund Site (MEW Superfund Site) and former Naval Air Station Moffett Field Superfund Site (NAS Superfund Site). Under a Record of Decision (ROD) from the Department of Justice, the MEW Superfund Site Companies (MEW Companies) have been conducting soil and groundwater cleanup at the MEW Superfund Site for approximately three decades. Responsibility for remediation of the contaminated groundwater is allocated among the MEW Regional Groundwater Remediation Program, the Navy, and NASA, referred to as the "Responsible Parties." Ongoing remediation activities in the vicinity of the Premises continue to be implemented under

¹ Throughout this report, *proposed project* refers to both the proposed project (under the California Environmental Quality Act) and the proposed action (under the National Environmental Policy Act).

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

³ Throughout this report, *Premises* refers to the same acreage as the Project Site. Premises is a term used in the *Environmental Issues Management Plan* (discussed below). Both terms are used interchangeably throughout this report.

the jurisdictions of state and federal agencies (Remediation Activities). Remediation Activities are being performed by the Responsible Parties. Phytoremediation will be implemented by the Project Proponent within the Limits of Work pursuant to the Covenant Not to Sue described below and is not considered a Remediation Activity; rather, phytoremediation is a feature of the project and is not specifically remediation or mitigation.⁴ The Project Proponent is working with the United States Environmental Protection Agency (U.S. EPA), the California Regional Water Quality Control Board, San Francisco Bay Region (Water Board), and NASA on an *Environmental Issues Management Plan* (EIMP).⁵ The purpose of the EIMP is to provide a decision framework for the management of residual chemicals in soil, groundwater, and existing structures during construction and operation of the Project at the Premises and outside of the Premises within the Limits of Work. In addition, a Settlement Agreement and Covenant Not to Sue is being entered into between Moffett Partners, LLC, on the one hand, and the United States Department of Justice and United States Environmental Protection Agency Region 9, on the other hand (Covenant Not to Sue), with respect to the Premises. The Covenant Not to Sue provides the Project Proponent with certain liability relief in consideration of a monetary payment, a phytoremediation project, and implementation of the EIMP within the Limits of Work.

This memorandum provides information regarding hazardous material conditions in support of the preparation of a joint environmental impact report/environmental impact statement (joint EIR/EIS) for the Project, including: (1) a summary of the current environmental setting; (2) description of known potential environmental impacts to the Project related to hazards and hazardous materials; (3) description of current regulatory requirements for the Project; (4) risk management procedures to be implemented during construction; and (5) risk management procedures to be implemented post-construction.

PROJECT CHARACTERISTICS

The proposed project under consideration by NASA (i.e., the proposed action) would include academic and research facilities, consisting of offices, laboratories, research-and-development (R&D) uses, and related amenities (collectively, “Research and Office Uses”); conference center and related amenities (“Conference Uses”); ground-floor retail, food and beverage, maker spaces (i.e., collaborative work spaces for using various tools and materials), and other complementary accessory uses that would be publicly accessible (collectively, “Active Uses”); student/faculty housing, including associated amenities (“Student/Faculty Housing”); short-term lodging, including associated amenities (“Short-Term Lodging”); transportation networks; and open spaces, as well as landscaped spaces, to create a state-of-the-art research and education hub that shapes the future of technology and innovation and advance the UC Regents educational, scientific research, charitable, and other exempt purposes (within the meaning of Section 501(c)(3) of the United States Internal Revenue Code). Implementation of the proposed project would include demolition of all existing buildings on the Project Site. In addition, as discussed above, the

⁴ Phytoremediation is considered to be experimental in that a robust dataset documenting efficacy is not available to serve as a design basis. Consequently, phytoremediation cannot be implemented in a manner to achieve specific numerical remedial goals.

⁵ The Spring 2026 EIMP is currently under review by the U.S. EPA and Water Board. The U.S. EPA and Water Board are the regulatory agencies that will approve of the EIMP. NASA has previously reviewed and provided comments on the EIMP.

proposed project also includes Off-Site Areas consisting of utility improvements and building demolition. Together, the Project Site and the Off-Site Areas comprise the Limits of Work.

The joint EIR/EIS evaluates the following:⁶

- CEQA Proposed Project (NEPA Build Alternative 1)
 - No Student/Faculty Housing Variant/Sub-Alternative
- CEQA Reduced Density Alternative (NEPA Build Alternative 2)
 - No Student/Faculty Housing Variant/Sub-Alternative
- CEQA Reduced Height Alternative
- CEQA No-Project/Existing Conditions Alternative
- NEPA No-Action Alternative

The risk management procedures to be implemented during and after construction summarized herein must be applied regardless of whether the CEQA Proposed Project or CEQA Reduced Density Alternative (with or without the No Student/Faculty Housing Variant/Sub-Alternative) is ultimately constructed and the extent of the requirements is similar under each. Therefore, this memorandum applies to both the CEQA Proposed Project and CEQA Reduced Density Alternative, unless otherwise noted. Impacts related to hazardous material conditions are the same for all of the CEQA and NEPA alternatives.

BACKGROUND

The Limits of Work are located primarily on federal land within NASA ARC, an approximately 2,000-acre facility located in unincorporated Santa Clara County, California between U.S. 101 and the southwestern edge of San Francisco Bay. A small portion of the Off-Site Areas is on federal land owned by the United States Army (Army). The city of Mountain View borders NASA ARC to the north and southwest, and 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 Project Site is within the city of Mountain View Sphere of Influence but outside of any city's jurisdictional limits. The Off-Site Areas are also within the city of Mountain View Sphere of Influence; most of the Off-Site Areas are outside of any city's jurisdictional limits, with the exception of the northern portion and the southwestern portion, which are within the city of Mountain View. The Project Site is bounded by Wescoat Road to the north and Cody Road to the east.⁷ The southern boundary of the Project Site is between Edquiba Road and Girard Road. The western boundary of the Project Site is within an

⁶ Throughout this report, the discussion of the CEQA Proposed Project and the CEQA Reduced Density Alternative also applies to the corresponding Build Alternative under NEPA.

⁷ Cody Road would be realigned to the east as part of the proposed project and would be the eastern boundary of the Project Site.

empty lot immediately west of Bailey Road. The Project Site is a portion of Santa Clara County Assessor's Parcel Number 116-18-012.

The Premises is located within the NRP portion of the NAS Superfund Site and soil and groundwater within the Premises have been impacted by historical use by the Navy, as well as by the migration of groundwater containing chlorinated volatile organic compounds (VOCs) originating south of the Premises from the portion of the MEW Superfund Site located in the City of Mountain View.⁸ The Navy began conducting a Remedial Investigation/Feasibility Study for NAS Moffett Field coordinating its actions through a Federal Facilities Agreement (FFA) with the U.S. EPA, the California Environmental Protection Agency (CalEPA) including the Department of Toxic Substances Control (DTSC), and the Water Board (U.S. EPA, 1990). This agreement was amended in December 1993 (U.S. EPA, 1993). Nearly all of the area known as Moffett Field, with the exception of two housing areas, was transferred to NASA in 1994 (PRC, 1996). In accordance with the transfer documents and a 1994 Amendment to the Navy Moffett Field FFA, the Navy retained all Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) response authority for Moffett Field, while NASA became responsible for ongoing environmental operations. Additionally, as the land manager at Moffett Field after 1994, NASA is responsible for implementation of institutional controls for Navy response actions. In 2014, U.S. EPA, Water Board, and NASA entered into a NASA-specific Moffett Field FFA (NASA Moffett FFA) which sets forth NASA's responsibilities at Moffett Field for addressing contamination within areas of contamination where NASA itself is responsible and for implementing institutional controls for the areas where it has responsibility as the land manager of NASA Research Park (U.S. EPA, 2014).⁹

SUMMARY OF ENVIRONMENTAL SETTING

Numerous potential sources of contamination within the Premises have been investigated and remediated by the Navy; these sources are primarily associated with underground storage tanks (USTs) and sumps that contained petroleum hydrocarbon products and/or chlorinated VOCs. AECOM Technical Services, Inc. prepared an Environmental Baseline Survey (EBS) on behalf of NASA in 2019 that describes the parcels included in the Premises and surrounding area (AECOM, 2019). The EBS incorporates data from multiple investigations conducted at the Premises and surrounding area, historical records, and records of remedial activities conducted at the Premises and surrounding area. In addition, an area-specific summary of environmental conditions is presented in the EIMP prepared by EKI (EKI, 2026), discussed further below.

A large regional plume of chlorinated VOCs is present at the Premises. The primary source of this contamination is migration of contaminated groundwater from the portions of the MEW Superfund Site located south of Highway 101 (Geosyntec, 2025) that has commingled with groundwater contamination from Navy chlorinated solvent sources located within the NRP and NASA sources within the NASA ARC

⁸ The portion of the MEW Vapor Intrusion Area that is located in the vicinity of the Premises is shown on Figures 3 and 5. The MEW Vapor Intrusion Study Area represents the boundary of the MEW Superfund Site VOC groundwater plume where trichloroethene concentrations are greater than 5 micrograms per liter.

⁹ The Project Proponent's ground lease with NASA requires "Tenant [receiving] from EPA a Bona Fide Prospective Lessee Agreement or Prospective Lessee Agreement in form and substance satisfactory to Tenant." Tenant/Project Proponent is currently engaged in negotiations with EPA for this agreement referred to as the Covenant Not to Sue for the Premises.

(NASA, 2025). In addition, petroleum hydrocarbons and fuel-related constituents, such as benzene, toluene, ethylbenzene and xylenes (BTEX), from sources at Moffett Field, have also impacted groundwater beneath the Premises. The MEW Companies have installed and are operating a groundwater remediation system on the Premises that includes groundwater monitoring wells for groundwater remediation systems for both the MEW Companies and the Navy (U.S. EPA, 2024b; NASA, 2025) as part of ongoing Remediation Activities. Figure 2 shows the locations of existing monitoring wells, recovery wells, and treatment system piping. Figure 3 shows the locations of restoration program locations and former UST, aboveground storage tank (AST), and sump locations.

As a result of investigations and remedial actions that have been performed within the Premises, the identified environmental conditions and primary chemicals of potential concern (COPCs) that need to be considered during redevelopment are:

- the presence of chlorinated VOCs in groundwater, soil gas, and soil within the Premises, predominantly resulting from the migration of contaminated groundwater from the upgradient MEW Superfund Site as well as NASA sources within the NASA ARC; the primary chlorinated VOC COPCs associated with the MEW Superfund Site are trichloroethene (TCE) and cis-1,2-dichloroethene, although several other VOCs are frequently detected; as of September/October 2024, the maximum concentration of TCE detected in groundwater within the Premises was 570 micrograms per liter (ug/L) at location REG-4A (Geosyntec, 2025);
- fuel oil and solvent tanks associated with the former dry cleaning facility (Tanks 67 and 68, respectively) in 1990 and the mid-1990's, respectively; tetrachloroethene was detected in a confirmation soil sample at a maximum concentration of 0.13 mg/kg; Tank 67 was closed with a No Further Action letter from the Water Board in 2000; Tank 68 and associated Sump 91 have not received regulatory closure and are considered to be part of IR Site 28, an active Navy remediation site;
- the presence of total petroleum hydrocarbons (TPH) and other fuel-related constituents, including BTEX compounds, in groundwater and in soil within the Premises, including, but not limited to:
 - TPH associated with Tanks 86A and 86B, two USTs which were removed in 1993 and closed with a No Further Action letter from the Water Board in 2000; TPH as gasoline was not present in groundwater above the reporting limit of 50 ug/L at the time of closure;
 - TPH and BTEX associated with Tank 110, a former diesel UST located north of Building 109, were reportedly not detected in soil and groundwater samples collected at this UST; Tank 110 was closed with a No Further Action letter from the Water Board in 2000;
 - TPH associated with Tanks 33 through 40 (eight USTs) and Sump 42 at and near the NEX Service Station, which were removed from 1990 to 1993 and closed in a No Further Action letter with use restrictions from the Water Board in 2011;
 - TPH associated with hydraulic lifts, a hydraulic oil reservoir tank, a waste oil line, and a subgrade clarifier at the NEX Service Station, which were closed in a No Further Action letter with use restrictions from the Water Board in 2015; the confirmation soil samples collected

- in the vicinity of the hydraulic lifts contained up to 22,000 mg/kg TPH as hydraulic oil, but the extent of impact was limited based on follow-up soil samples collected in 2012; TPH as hydraulic oil and as motor oil in groundwater were 300 ug/L and 220 ug/L, respectively, at the time of closure in 2015;
- TPH associated with Sump 25 at IR Site 15, which was closed in a No Further Action letter with use restrictions from the Water Board in 2011; the confirmation soil sample contained purgeable TPH as jet fuel at a concentration of 5,800 mg/kg and TPH as diesel at 9,500 mg/kg and the grab groundwater sample from the excavation pit contained purgeable TPH as jet fuel at 100 ug/L and TPH as motor oil at 3,300 ug/L;
 - the presence of per- and polyfluoroalkyl substances (PFAS) compounds in groundwater within the Premises (Tetra Tech, 2023) resulting from multiple historical site uses, including:
 - perfluorooctanoic acid at up to 7.3 nanograms per liter (ng/L);
 - perfluorooctanesulfonic acid at up to 14 ng/L; and
 - perfluorobutanesulfonic acid at up to 16 ng/L;
 - the potential presence of elevated concentrations of polychlorinated biphenyls (PCBs) in soil surrounding buildings or transformers;
 - the potential presence of elevated concentrations of lead in soil surrounding buildings;
 - existing subsurface structures (e.g., sumps or tanks) that may need to be removed; and
 - building materials containing hazardous materials (e.g., asbestos-containing materials, lead-based paint, and PCB-containing materials in existing buildings).

Due to residual COPCs present at the Premises, an EIMP was prepared to provide requirements to be implemented before, during, and after development for the protection of human health and the environment during construction and occupancy.

ENVIRONMENTAL ISSUES MANAGEMENT PLAN

An EIMP (EKI, 2026) has been prepared with input from U.S. EPA and the Water Board as lead regulatory agencies for the NAS Superfund Site as well as input from the EPA as the lead regulatory agency for the MEW Superfund Site to provide a decision framework for the management of residual chemicals in soil, groundwater, and existing structures within the Premises during occupancy and development. The EIMP describes procedures to address the known remaining environmental conditions within the Limits of Work, as well as contingency actions to be taken in the event that previously-unknown environmental conditions are encountered during development in the Limits of Work. The purpose of the EIMP is to provide sufficient information to Project Stakeholders (NASA, Project Proponent, developers, and tenants) to comply with land use restrictions and institutional controls (LUCs) and take reasonable steps with respect to environmental conditions within the Premises to help ensure that occupancy and development activities within the Premises proceed in a manner that is protective of human health and the

environment and is coordinated with the ongoing response actions being undertaken by the Responsible Parties. In addition to activities to take place on the Premises, the EIMP applies to off-site improvements outside the Premises to support the development of the Premises, i.e., within the Limits of Work. Figure 4 and Figure 5 included in this memorandum illustrate the Responsible Parties for soil, groundwater, and vapor intrusion (VI) issues within the Premises and the planned Limits of Work.

The EIMP provides a baseline of minimum design considerations for new construction, risk management measures to be implemented during construction within the Limits of Work, post-construction risk management procedures for future subsurface activities within the Limits of Work, as well as procedures for long-term compliance with the EIMP, CERCLA, and other environmental requirements. The EIMP directs Project Stakeholders with responsibility for activities within the Limits of Work to: (1) review available information concerning environmental conditions within the Limits of Work; (2) determine the adequacy of the EIMP with respect to expected environmental conditions as well as the conditions actually encountered during development and the intended land use; (3) evaluate the current understanding of the health and environmental effects of identified COPCs, to the extent the understanding of health and environmental effects assumed in the EIMP may change; (4) comply with applicable policies, laws and regulations; and (5) establish management procedures to ensure that risk management measures are properly implemented and maintained. NASA will monitor implementation of the EIMP and the regulatory agencies will review and approve measures taken in accordance with the EIMP. The EIMP requirements are summarized further in Table 1 below.

Table 1
Summary of EIMP Requirements

EIMP Requirement ^{1,2}	Implementing Entity	Reviewing Entity	Approving Entity
Protect existing remedial and monitoring systems, or, otherwise, relocate groundwater remediation system features in conflict with development	Project Proponent and Responsible Parties	NASA	U.S. EPA, Water Board, and/or Responsible Parties
Install vapor intrusion mitigation systems for buildings located within the MEW Site VI Study Area and conduct subsequent indoor air sampling	Project Proponent and Responsible Parties	N/A	NASA and U.S. EPA
Prevent potential pathways for COPC migration in groundwater and soil gas that could result from construction	Project Proponent	NASA, Santa Clara Valley Water District ³	U.S. EPA and Water Board ⁴
Prepare a Project Information and Summary of Environmental Conditions (PISEC) in advance of development activities	Project Proponent	NASA, MEW Companies	U.S. EPA and Water Board
Implement risk management measures during construction to mitigate potential risks to human health and the environment from COPCs	Project Proponent	NASA	U.S. EPA and Water Board
Implement post-construction risk management measures for long-term risks to human health and the environment during non-construction activity	Project Stakeholders	NASA	U.S. EPA and Water Board

N/A = Same as Approving Entity

Notes:

1. This table presents a summary of key EIMP requirements and are described in greater detail herein; refer to the EIMP for complete requirements.
2. Additionally, all Project Stakeholders with responsibility for activities within the Limits of Work are required to: (1) review available information concerning environmental conditions within the Limits of Work; (2) determine the adequacy of the EIMP with respect to expected environmental conditions as well as the conditions actually encountered during development and the intended land use; (3) evaluate the current understanding of the health and environmental effects of identified COPCs, to the extent the understanding of health and environmental effects assumed in the EIMP may change; (4) comply with applicable policies, laws and regulations; and (5) establish management procedures to ensure that risk management measures are properly implemented and maintained.
3. Driven piles are not included as part of the proposed project. The proposed project may include piles installed through other construction methods. The EIMP provides for Santa Clara Valley Water District to review designs that include piles that extend to depths greater than 20 feet.
4. Design reports for features that prevent potential pathways of COPC migration will be provided to Water Board and U.S. EPA for review and concurrence.

Potential Exposure Pathways

The intended land uses for the Premises include Research and Office Uses, Conference Center Uses, Active Uses, Student/Faculty Housing, and Short-Term Lodging for visitors and conference attendees. As a result, the primary potential future receptors potentially include (a) construction workers and maintenance workers; (b) indoor workers, such as office personnel, students, and lab workers; (c) residents at the Student/Faculty Housing; and (d) visitors at the Short-Term Lodging. Potential future receptors may be exposed to COPCs by one or more of the following pathways:

- inhalation of volatile chemicals from groundwater or soil;
- dermal absorption due to direct soil and/or groundwater contact;
- inhalation of airborne suspended soil particulates; and
- incidental soil ingestion.

VOCs are the primary COPCs found within the Premises. VOCs in groundwater and soil can volatilize into the pore spaces within unsaturated zone soils and migrate through the soil column and through cracks or penetrations in floors into enclosed indoor spaces, where they can be inhaled by potential receptors. The migration of COPCs from the subsurface into indoor air is called vapor intrusion. Vapor intrusion is the primary potentially complete exposure pathway that could affect future indoor residents/visitors and workers within all portions of the Premises.

Target Concentration Levels

Although cleanup standards have been developed for many areas at the Premises, to simplify implementation of the EIMP, Target Concentration Levels (TCLs) were developed for soil, groundwater, sub-slab vapor, soil gas, and indoor air within the Premises using (1) adopted cleanup levels in existing U.S. EPA decision documents, including the *Record of Decision, Fairchild, Intel, and Raytheon Sites, Middlefield/Ellis/Whisman (MEW) Study Area* (U.S. EPA, 1989) and the *ROD Amendment for the Vapor Intrusion Pathway at the MEW Superfund Study Area* (U.S. EPA, 2010); (2) the screening levels currently promulgated by applicable regulatory agencies, including the Water Board's Environmental Screening Levels (ESLs; Water Board, 2025) for commercial/industrial or residential land use, the U.S. EPA's Regional Screening Levels (RSLs; U.S. EPA, 2024c) for commercial/industrial or residential land use, the California Maximum Contaminant Levels (MCLs; SWRCB, 2024), the Federal MCLs (U.S. EPA, 2024a), and Toxic Substances Control Act (TSCA) regulations (40 CFR §761) for high occupancy areas, as appropriate; and (3) background concentrations for metals (Scott, 1995).

The EIMP describes how the TCLs should be used to determine (a) groundwater management or disposal options; (b) whether excavated soil can be reused as fill within the Premises and whether additional soil removal should be considered at locations where potential soil contamination is observed during development; and (c) whether vapor intrusion mitigation measures may need to be installed in existing buildings. The identified TCLs should also be protective of short-term construction workers, maintenance workers performing periodic subsurface activities, indoor workers, students, and people living in/visiting the Student/Faculty Housing and Short-Term Lodging within the Premises. Based on historic soil and groundwater data collected within the Premises, TCLs were identified for several chlorinated VOCs,

petroleum hydrocarbons and BTEX compounds, polycyclic aromatic hydrocarbons, PCBs, and Title 22 metals. In addition, PFAS compounds were detected in groundwater in sampling performed in 2021 (Tetra Tech, 2023).

Cleanup levels for sites that are being addressed as part of the NAS Superfund Site and the MEW Superfund Site are those determined by the CERCLA lead agency and presented in the applicable cleanup documents (U.S. EPA, 1989; U.S. EPA, 2010).

REMEDIATION ACTIVITIES UNDERTAKEN BY RESPONSIBLE PARTIES

As indicated above, the MEW Companies have installed and are operating a groundwater remediation system on the Premises that includes groundwater monitoring wells for groundwater remediation systems for both the MEW Companies and the Navy (U.S. EPA, 2024b; NASA, 2025) as part of ongoing Remediation Activities. Figure 2 shows the locations of existing monitoring wells, recovery wells, and treatment system piping. The MEW Companies will continue operation of the groundwater remediation system; however, as discussed below, the Project Proponent is required to coordinate with the Responsible Parties if these systems need to be re-located to accommodate the development. Such relocations should minimize impacts to the efficacy of the systems and are required to be approved by the U.S. EPA and Water Board. The cost of such equipment relocation is typically borne by the Project Proponent; the re-location activities will be performed either by the Responsible Parties or the Project Proponent depending on agreements between the parties.

RISK MANAGEMENT DURING PROJECT DESIGN, CONSTRUCTION, AND OPERATIONS

As discussed below, the measures described in the EIMP are intended to address the potential risks from the inhalation of volatile chemicals from impacted soil, groundwater, soil gas or sub-slab vapors, direct contact with impacted soil, groundwater, or impacted building materials, the inhalation of airborne particulates, and the ingestion of impacted soil or groundwater such that human health is protected during and after development of the Premises. All the measures described below are included in the EIMP and are summarized herein. Unless otherwise indicated in the EIMP, compliance with the EIMP is overseen by the U.S. EPA, Water Board, and/or NASA, depending on the specific activity being performed.

Redevelopment within the Premises will be conducted in a manner that protects remedial and monitoring systems in place to the extent possible. Certain components of the existing remedial and monitoring systems, including wells and treatment system piping, will need to be relocated, modified, or replaced to accommodate the redevelopment; as described further below, these accommodations will be performed as necessary with minimal interference to the implementation of selected Site remedies.

NASA will notify U.S. EPA and Water Board regarding relevant redevelopment and construction activities within the Premises.

Risk management activities described for development of the Premises also apply to off-site improvements (i.e., within the Limits of Work) to support the development of the Premises.

Risk Management Design Considerations for New Construction

Measures to Reduce Potential Exposure to VOCs in Indoor Air

COPCs in groundwater in some areas within the Premises could potentially result in human health risks above the above-described TCLs in indoor air through vapor intrusion. These risks stem primarily from the migration of TCE in shallow groundwater or soil gas. In its *ROD Amendment for the Vapor Intrusion Pathway at the MEW Superfund Study Area* (2010 VI ROD Amendment; U.S. EPA, 2010), the U.S. EPA defined the MEW VI Study Area (Figure 5) based on the approximate extent of the 5 ug/L TCE in groundwater contour and developed different response actions for existing and future residential and commercial buildings within this area.

To address this potential risk and as specified in the 2010 VI ROD Amendment, the selected remedy for future buildings located within the MEW Site VI Study Area with TCE above 5 ug/L is the installation of a vapor intrusion mitigation system (VIMS) either a passive sub-slab ventilation system that can be made active or an active sub-slab depressurization system, and indoor air sampling to confirm that there is no vapor intrusion risk. As described in the EIMP, implementation of this remedy is required for each proposed building within the Premises. NASA and the U.S. EPA will review and approve the design of the VIMS.

Long-term VI Monitoring Plans for the MEW Site VI Study Area will be developed by the Responsible Parties in accordance with the 2010 VI ROD Amendment and VI Statement of Work. The Long-Term VI Monitoring Plan for the MEW Companies was prepared in 2023 and submitted to the U.S. EPA, but has not yet been approved (Geosyntec, 2023). The appropriate Responsible Party (Navy or MEW Companies) and the U.S. EPA will require long-term access to conduct the appropriate building-specific monitoring to ensure the implemented VI remedy's effectiveness. On-going operation and management of the VIMS will be performed in accordance with a building-specific operations, monitoring, and maintenance plan to be prepared by the party operating the system once the VIMS has been constructed.

Measures to Mitigate Groundwater and Soil Gas Movement

Due to the groundwater contamination in the aquifer underlying the Premises, the EIMP describes measures to prevent new construction from creating potential pathways for migration of COPCs in groundwater or soil gas. Utility lines installed in trenches or horizontal boreholes in areas where contaminated groundwater or soil gas could potentially flow through utility line backfill material must include the use of low permeability backfill or cutoff walls to reduce potential contaminant migration. Driven piles are not included as part of the proposed project. The proposed project may include piles installed through other construction methods. The EIMP provides for Santa Clara Valley Water District to review designs that include piles that extend to depths greater than 20 feet (i.e., potentially below the shallow aquifer impacted by COPCs), the design will be evaluated for potential for driving impacted soil deeper or creating conduits for downward contaminant migration, and measures must be included in their design, if necessary. In both situations, the Project Proponent will prepare a design report for review by NASA (and for Santa Clara Valley Water District review if piles are included in the proposed project) describing the measures that will be taken and demonstrating their effectiveness in preventing potential

migration of COPCs. The Project Proponent will also submit the design report to the U.S. EPA and Water Board for review and concurrence.

Protecting Existing Site Remedies

Procedures have been developed to allow for the modification of the existing remediation systems and their monitoring wells if potential conflicts occur between the planned development and the location of the existing systems; these procedures are presented in further detail in the EIMP. Close coordination between the Project Proponent, NASA, the Navy, and/or the MEW Companies, as the case may be, and the applicable regulatory agencies, will occur during the design and construction phase of development to ensure that measures are taken to protect implemented remediation systems¹⁰ and monitoring wells (or remedies still being investigated or that are under development) for groundwater; any regulatory agency-approved modifications or disturbances¹¹ to the implemented remediation systems and monitoring wells will be appropriately repaired. Any such modifications are subject to approval by U.S. EPA, the Water Board, NASA, and the Navy and/or the MEW Companies, as the case may be. Such modifications will be in the Limits of Work.

Preparation of Project Information and Summary of Environmental Conditions

For each phase of the Project, a Project Information and Summary of Environmental Conditions (PISEC) will be prepared by the Project Proponent in advance of any development activities and provided to NASA, the MEW Companies, the U.S. EPA, and the Water Board. Based on the current Masterplan, it is anticipated that project phasing will occur in clusters of two to four buildings per phase. The PISEC will include the following:

- Project description, including a description of the planned development activities for that phase of the Project and key health and safety information, as appropriate;
- Identification of project roles, including contact information for the Project Proponent, contractors, consultants, and oversight agency;
- Project schedule, including start date, phasing, and anticipated durations;
- Deviations from the EIMP, if any;
- Summary of environmental conditions;

¹⁰ Conveyance piping and extraction wells associated with the MEW Companies Ground Water Treatment System (GWTS) is located within the Premises, and several of the monitoring wells associated with West-Side Aquifer Treatment System (WATS) are located within the Premises (Figure 2). NASA has taken over responsibility of the operations, monitoring and maintenance of the WATS from the Navy. Navy monitoring wells are also located within the Premises.

¹¹ Any disturbances to the implemented Site remedies must be timely reported to the Responsible Party, NASA, the U.S. EPA, and Water Board.

- Applicable land use restrictions and institutional controls; and
- References.

The PISEC for each area must be approved by the appropriate regulatory agencies (U.S. EPA and Water Board) prior to the start of construction activities.

Risk Management During Construction

The EIMP summarizes risk management measures to be implemented during construction to mitigate potential risks to human health and the environment from COPCs. These measures include:

- review of available information to identify COPCs;
- development and implementation of a Site-specific health and safety plan that describes health and safety training requirements for on-site workers, personal protective equipment to be used, and other precautions to be undertaken to minimize direct contact with soil, groundwater, and soil vapors;
- implementation of construction impact mitigation measures, such as implementing dust and odor control measures, decontaminating construction and transportation equipment, implementing storm water pollution controls, and sampling and analyzing groundwater extracted during construction to determine appropriate storage and disposal practices;
- proper management of asbestos-containing material (ACM); debris and structures containing lead-based paint and/or PCB-containing paint; and PCB-containing equipment or building materials that are removed during development within the Premises;
- procedures for the management of abandoned USTs, sumps, pipes, and buried drums or containers that may be encountered during development activities within the Premises;
- procedures for the management of dewatering water generated during construction activities;
- procedures for protecting implemented remedies and the existing groundwater remediation systems (including monitoring wells) during development activities within the Premises and implementing any approved modifications to the remediation systems and/or remedies; and
- procedures for the management of soil potentially impacted by COPCs that is handled during construction activities. The soil management protocols include screening procedures to identify and manage COPC-impacted soil that is excavated during development within the Premises, as well as contingency procedures to be followed in the event that previously unknown soil contamination is encountered.

In general, the Project Proponent will conduct the necessary environmental sampling and screening of soil and groundwater during development within the Premises, as further described by the EIMP. The Project Proponent will also be responsible for the necessary excavation and reconsolidation or removal of potentially impacted soil or groundwater encountered within construction limits/boundaries during

construction, as well as subsurface structures, such as unknown USTs that are encountered within construction areas during construction excavation. The Project Proponent will dispose of potentially impacted soils and subsurface structures at a permitted off-site facility in accordance with all applicable laws and regulations; NASA will be designated as generator of the wastes and will sign all waste manifests. Soil containing concentrations of heavy metals above TCLs may be reconsolidated under buildings or hardscape with U.S. EPA and Water Board approval.

Depending on the area in which the excavation occurs and the COPCs detected in groundwater, groundwater produced during dewatering of excavations will be either (a) used for dust control within the Premises with NASA approval, (b) with permission of the Responsible Party for any existing or future groundwater treatment system, transported to such groundwater treatment system for treatment and ultimate disposal, or (c) discharged to the sanitary sewer (if a discharge permit can be obtained). Should the Project Proponent be unable to dispose of the dewatering water by one of the options listed above, the Project Proponent will arrange for the treatment and/or disposal of this water at a permitted off-site facility and NASA will be designated as generator of the wastes and will sign all waste manifests.

Post-Construction Risk Management

The EIMP also describes precautions that will be implemented by Project Stakeholders to mitigate long-term risks to human health and the environment related to potential exposure to COPCs during periods of normal non-construction activity. These precautions include:

- Notification of future property managers and tenants of known environmental conditions within the Premises, LUCs, and the requirements of the EIMP via a statement of environmental conditions, which will include the key requirements specified in the EIMP;
- Additional risk analysis and modification of the EIMP, as appropriate, if any relevant change in land use is proposed for the Premises, if there is a relevant change in any of the implemented remedies within the Premises, or if any significant change in toxicity values or screening levels for COPCs occurs;
- Restriction of the use of groundwater within the Premises for drinking water or any other purpose not allowed pursuant to the EIMP unless its use is approved by NASA, the U.S. EPA, the Water Board, and the Santa Clara Valley Water District; exceptions include treated groundwater used for irrigation, industrial heating or cooling, or toilet water;
- Implementation of health and safety and other procedures similar to those described for construction activities at the Premises for future activities that disturb subsurface soil (e.g., utility repairs) within the Premises;
- Review of VI monitoring reports prepared by Responsible Parties who inspect maintain and monitor same, as they pertain to buildings located within the Premises; any activity that disturbs the VIMS such as utility penetrations or slab disturbance is required to be repaired to restore the protectiveness of the VIMS;
- Compliance with LUCs within the Premises;

- Cooperation with the Responsible Parties and regulatory agencies to provide reasonable access to areas of contamination or other areas upon which any environmental response action is or will be installed or implemented;
- Ongoing operation and maintenance as needed to verify the continued adequacy of implemented remedy, as required by environmental decision documents or the regulatory agencies; and,
- Monitoring of changes in COPC toxicity parameters to assess if additional or lesser mitigation may be needed based on an updated understanding of chemical toxicity of reported COPCs within the Premises.

Identified Mitigation Measure

Mitigation Measure HAZ-1 is identified to ensure implementation of the EIMP and minimize potential impacts on risks related to hazards and hazardous materials.

Mitigation Measure HAZ-1: Implement the Environmental Issues Management Plan

The Project Proponent or its contractor(s) shall implement the *Environmental Issues Management Plan* (EIMP) prepared for the proposed project to (1) comply with land use restrictions and institutional controls (LUCs) and (2) take reasonable steps with respect to environmental conditions within the Premises to help ensure that occupancy and development activities within the Premises proceed in a manner that is protective of human health and the environment and is coordinated with the ongoing response actions being undertaken by the Responsible Parties. The EIMP shall include, but not be limited to, the following:

- A summary of environmental conditions;
- A summary of potential exposure pathways from COPCs in groundwater, soil vapor, and soil;
- Target cleanup levels;
- A baseline of minimum design considerations for new construction for vapor intrusion mitigation and utility construction;
- Risk management measures to be implemented during construction;
- Post-construction risk management procedures for future subsurface activities; and
- Procedures for long-term compliance with the EIMP, CERCLA (including vapor intrusion monitoring and associated operation and management of all engineering controls installed), and other environmental requirements.

The Spring 2026 EIMP has been submitted to the U.S. EPA and Water Board for review and must be approved prior to initiation of construction activities.

The EIMP provides a baseline of minimum design considerations for new construction, risk management measures to be implemented during construction within the Limits of Work, post-construction risk management procedures for future subsurface activities within the Limits of Work, as well as procedures for long-term compliance with the EIMP and other environmental regulatory requirements. With

implementation of MM HAZ-1, which requires compliance with the EIMP, human health and the environment would be protected.

FIGURES

- Figure 1 Berkeley Space Center Location
- Figure 2 Locations of MEW and Navy Monitoring Wells, Recovery Wells, and Treatment System Piping, Existing Site Layout
- Figure 3 Installation Restoration Program Site Locations and Current and Former UST, AST, and/or Sump Locations
- Figure 4 Navy and MEW Companies Allocation Areas, Soil and Groundwater
- Figure 5 Navy and MEW Companies Areas of Responsibility, Vapor Intrusion

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U.S. EPA, 1993. *Amendment of the Federal Facility Agreement, NAS Moffett Field*, U.S. Environmental Protection Agency and U.S. Department of the Navy and The State of California Represented by the California Department of Toxic Substances Control and the California Regional Water Quality Control Board, San Francisco Bay Region, 17 December 1993.

U.S. EPA, 2010. *Record of Decision Amendment for the Vapor Intrusion Pathway, Middlefield-Ellis-Whisman (MEW) Superfund Study Area, Mountain View and Moffett Field, California*, 16 August 2010.

U.S. EPA, 2014. *Federal Facility Agreement Under CERCLA Section 120 Between the U.S. Environmental Protection Agency Region IX and the State of California Represented by the California Regional Water Quality Control Board, San Francisco Bay Region, and the National Aeronautics and Space Administration*, November 2014.

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ABBREVIATIONS AND GLOSSARY

2010 VI ROD Amendment	Record of Decision Amendment for the Vapor Intrusion Pathway, MEW Superfund Study Area, Mountain View and Moffett Field, California, prepared by U.S. EPA and dated 16 August 2010.
ACM	asbestos-containing material
Army	United States Army
AST	aboveground storage tank
BTEX	benzene, toluene, ethylbenzene and xylenes
CalEPA	California Environmental Protection Agency
CEQA	California Environmental Quality Act National Environmental Policy Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act (Superfund Act)
COPC	chemicals of potential concern
Covenant Not to Sue	An agreement between Moffett Partners, LLC on one hand and the U.S. Department of Justice and the U.S. EPA on the other hand that provides certain liability relief in consideration of a monetary payment, a phytoremediation project, and implementation of the EIMP within the Limits of Work.
DTSC	Department of Toxic Substances Control
EBS	Environmental Baseline Survey; a document that describes and summarizes the environmental conditions of a property.
EIMP	Environmental Issues Management Plan (Spring 2026). Provides the framework to redevelop the Premises and Off-Site Areas in a manner that is protective of human health and the environment. EIMP includes minimum design considerations for new construction, risk management measures to be implemented during construction within the Limits of Work, post-construction risk management procedures for future subsurface activities within the Limits of Work, as well as procedures for long-term compliance with the EIMP and other environmental regulatory requirements.
EIR/EIS	Environmental impact report/environmental impact statement
FFA	Federal Facilities Agreement with the Navy, the U.S. EPA and CalEPA including the DTSC and the Water Board for the oversight of the investigation and remediation of the NAS Superfund Site. The FFA was signed in 1990 and amended in December 1993.
Limits of Work	The Project Site or Premises (39 acres) plus the Off-Site Areas (6-acre area outside of the Project Site where utility improvements would take place).
LUCs	land use restrictions and institutional controls
MEW	Middlefield-Ellis-Whisman

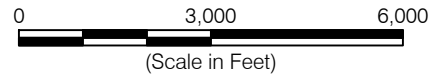
MEW Companies	Responsible Parties for the remediation of the MEW Superfund Site
MEW Superfund Site	U.S. EPA Superfund Site has source properties located in the vicinity of Middlefield Road, Ellis Street, and Whisman Road in Mountain View, California and its associated groundwater plume extends north of Highway 101 onto NRP and NASA ARC.
MEW VI Study Area	The approximate extent of the 5 ug/L TCE in groundwater contour throughout the MEW Superfund Site and the NAS Superfund Site west of the airfield.
micrograms per liter	micrograms per liter
milligrams per kilogram	mg/kg
nanograms per liter	ng/L
NASA	National Aeronautics and Space Administration
NASA ARC	NASA's Ames Research Center, an approximately 2,000-acre facility located in unincorporated Santa Clara County, California between U.S. 101 and the southwestern edge of San Francisco Bay.
NASA Moffett FFA	Federal Facilities Agreement with NASA, U.S. EPA, and Water Board, which sets forth NASA's responsibilities at Moffett Field for addressing contamination within areas of contamination where NASA itself is responsible and for implementing institutional controls for the areas where it has responsibility as the land manager of NRP.
NAS Superfund Site	Naval Air Station Moffett Field U.S. EPA Superfund Site located at the former Moffett Field, north of Highway 101 in Mountain View, California
NEPA	National Environmental Policy Act
NRP	NASA Research Park
Off-Site Areas	6-acre area outside of the Project Site where utility improvements would take place (Figure 1).
PCBs	polychlorinated biphenyls
PFAS	per- and polyfluoroalkyl substances
Phytoremediation	The use of trees or plants to remove COPCs from soil or groundwater.
PISEC	Project Information and Summary of Environmental Conditions; a description of a phase of the project that includes a summary of the project, key health and safety information, identified project roles and contact information, project schedule including phasing and duration, any deviations from the EIMP, a summary of environmental conditions, any applicable LUCs, and references.
Premises	39-acre property within NRP that is the subject this report. Premises is the term used to describe the 39-acre Project Site in the EIMP. Premises is used interchangeably with the Project Site in this report.

Project Proponent	Moffett Partners, LLC
Project Site	39-acre property within NRP that is the subject this report. The Project Site is bounded by Wescoat Road to the north and Cody Road to the east. The southern boundary of the Project Site is between Edquiba Road and Girard Road. The western boundary of the Project Site is within an empty lot immediately west of Bailey Road. Project Site is used interchangeably with the Premises in this report.
Project Stakeholders	NASA, Project Proponent, developers, and tenants
Remediation Activities	Activities associated with the cleanup of a site and can include remediation of soil, soil vapor, and groundwater.
remediation systems	The existing remediation systems on the Premises include groundwater monitoring wells, groundwater extraction wells, and conveyance piping for extracted groundwater to the treatment system, which is located north of the Premises.
Responsible Parties	The parties held responsible for the remediation of a site.
ROD	Record of Decision
TCE	trichloroethene, a chlorinated VOC
TCLs	Target Concentration Levels
TPH	total petroleum hydrocarbons
VOCs	volatile organic compounds
U.S. EPA	United States Environmental Protection Agency
USTs	underground storage tanks
vapor intrusion	The volatilization of VOCs in groundwater and soil into the pore spaces within unsaturated zone soils and migration through the soil column and through cracks or penetrations in floors into enclosed indoor spaces, where the VOCs can be inhaled by potential building occupants.
VI	vapor intrusion
VIMS	vapor intrusion mitigation system; VIMS is an engineered system installed under a building to limit VI into a building.
Water Board	Regional Water Quality Control Board, San Francisco Bay Region



Legend:

 Project Limits of Work



**Berkeley Space Center
Location**

Notes:

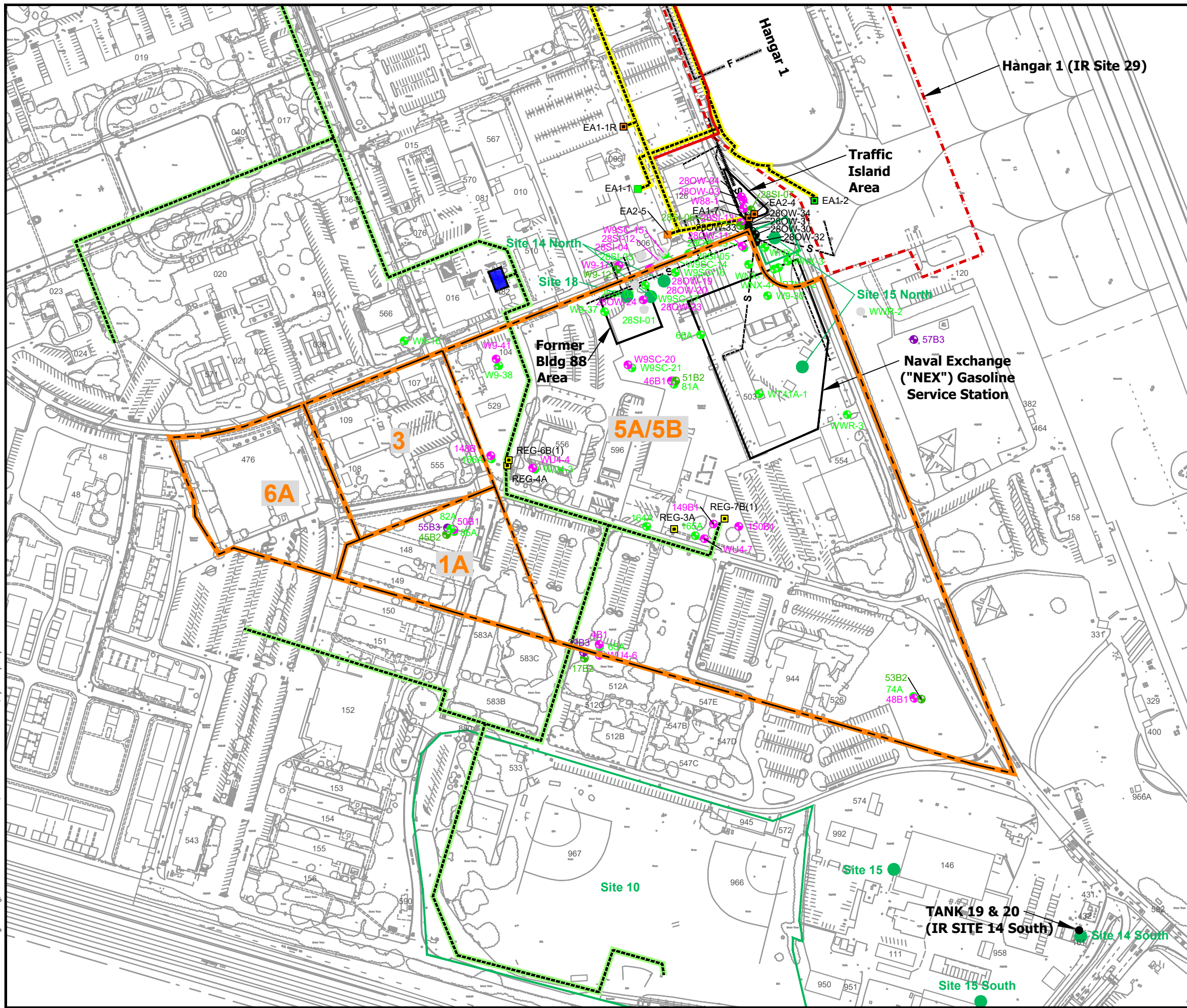
1. All locations are approximate.
2. Basemap source: Google Earth Pro, date of imagery 2 August 2023.

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Figure 1

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Legend:

- Premises as Defined in the Environmental Issues Management Plan (Note 2)
- CERCLA Site
- 104 Building Number
- A1 Aquifer Monitoring Well
- A2/B1 Aquifer Monitoring Well
- B2 Aquifer Monitoring Well
- B3 Aquifer Monitoring Well
- MEW Recovery Well
- Navy Recovery Well
- New Navy Extraction Well (2023)
- New Navy Monitoring Well (2023)
- Treatment Facility Piping
- Navy WATS Treatment Facility Piping
- MEW GWTS Treatment Facility Piping
- Treatment Facility
- F ----- Underground Fuel Line
- S ----- Sanitary Sewer Line
- S ----- Section of the Sanitary Sewer Line that Reportedly Collapsed (PRC, 1995)

Abbreviations:

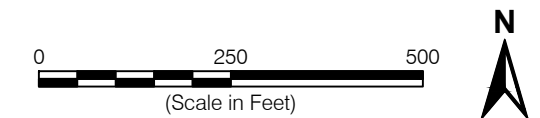
MEW = Middlefield-Ellis-Whisman

References:

PRC, 1995. *Final Operable Unit 2 – West (Building 88) Project Summary Report, Moffett Federal Airfield, California*, PRC Environmental Management, 9 October 1995.

Notes:

1. All locations are approximate.
2. Parcel numbers from a prior planned development are shown for consistency with prior environmental reporting.
3. Work to relocate existing remediation system infrastructure, as needed where in conflict with development, will be within the Limits of Work.

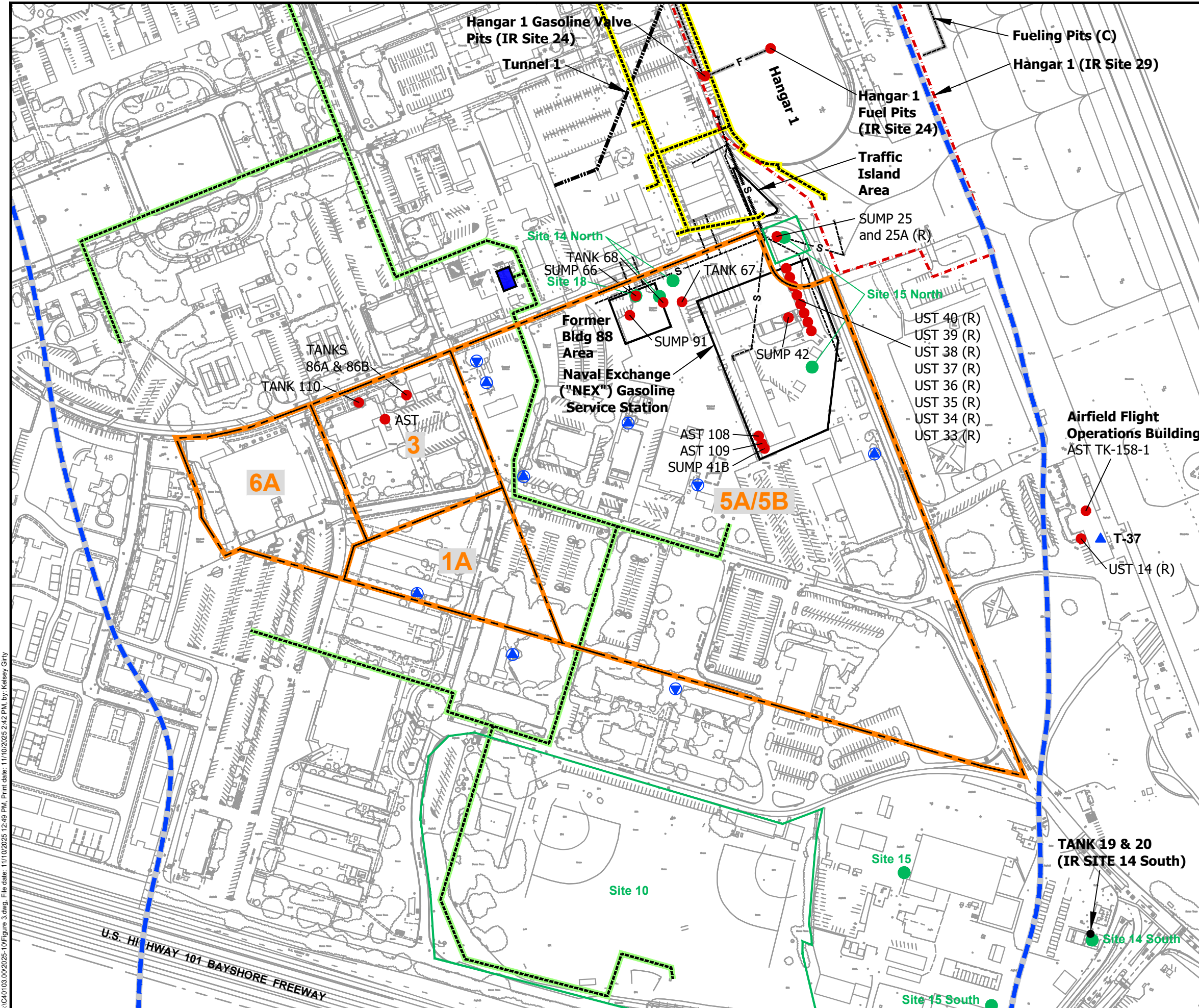


Locations of MEW and NAVY Monitoring Wells, Recovery Wells, and Treatment System Piping, Existing Site Layout



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Figure 2



Legend:

- Premises as Defined in the Environmental Issues Management Plan (Note 2)
- MEW Vapor Intrusion Study Area
- CERCLA Site
- Treatment Facility Piping
- Navy WATS Treatment Facility Piping
- MEW GWTS Treatment Facility Piping
- Treatment Facility
- F- Underground Fuel Line
- S- Sanitary Sewer Line
- S- (with wavy lines) Section of the Sanitary Sewer Line that Reportedly Collapsed (PRC, 1995)
- Tank, UST, AST, Sump and Pits
- ▲ Transformers
- ▲ (with circle) Oil-Filled Transformers
- ▲ (with circle) Transformers with PCBs

Abbreviations:

- (A) = Active
- (C) = Closed in Place
- (E) = Empty
- (R) = Removed
- AST = Aboveground Storage Tank
- GWTS = Ground Water Treatment System
- MEW = Middlefield-Ellis-Whisman
- PCBs = polychlorinated biphenyls
- WATS = West-Side Aquifer Treatment System

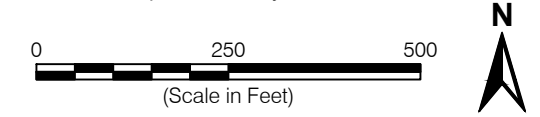
References:

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Notes:

- All locations are approximate.
- Parcel numbers from a prior planned development are shown for consistency with prior environmental reporting.
- The TCE contour is based on the 2022 data used by the EPA to delineate the MEW Vapor Intrusion Study Area (U.S. EPA, 2024). More recent groundwater data in this area is available in the annual groundwater monitoring reports at the U.S. EPA's website for the MEW Superfund Study Area.

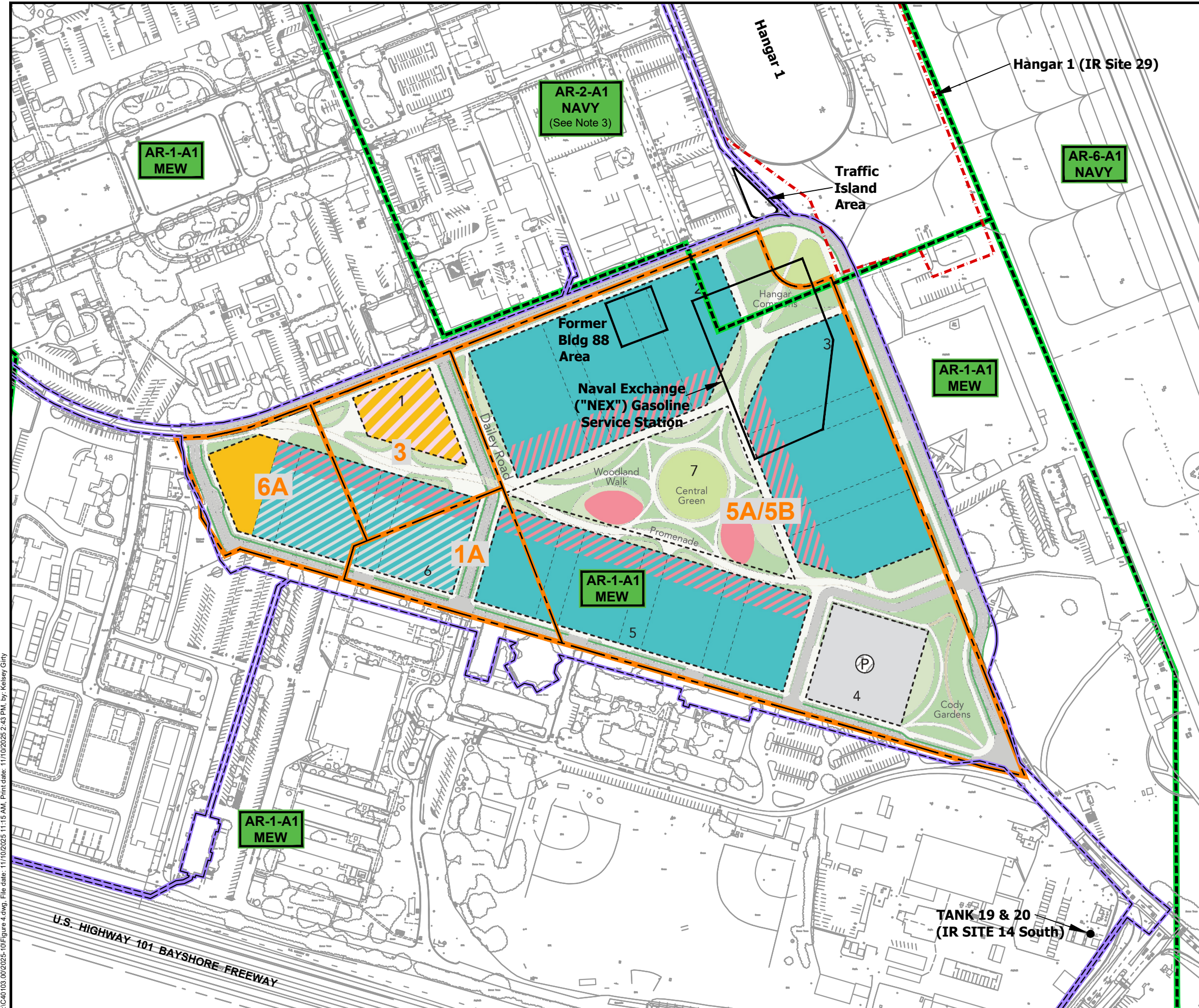


Installation Restoration Program Site Locations and Current and Former UST, AST, and/or Sump Locations

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Figure 3

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Legend:

- Project Limits of Work
- Premises as Defined in the Environmental Issues Management Plan (Note 2)
- Area of Responsibility Boundary

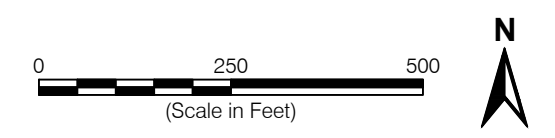
**Allocation and Settlement Agreement
NASA/NAVY/MEW Companies**

Location	Responsible Party/Contamination Type
AR-1-A1	MEW Companies: Chlorinated Solvents in Saturated Soil and Groundwater NAVY: TPH in Saturated Soil and Groundwater and all Vadose Zone Soil
AR-2-A1	NAVY: All Soil and Groundwater (See Note 3)
AR-6-A1	NAVY: All Soil and Groundwater

Abbreviations:

- MEW = Middlefield-Ellis-Whisman
- NASA = National Aeronautical and Space Administration
- TPH = Total petroleum Hydrocarbons

- Notes:**
1. All locations are approximate.
 2. Parcel numbers from a prior planned development are shown for consistency with prior environmental reporting.
 3. Areas of Responsibility from Exhibit B1 of the Allocation and Settlement for MEW Remedial Program Management Between the National Administration and Fairchild Semiconductor Corporation, Raytheon Company, and Intel Corporation, dated 16 March 1998.
 4. In 2016 NASA assumed operations, maintenance, and monitoring responsibilities at IR Site 28 including the WATS and associated extraction and monitoring wells.



**Navy and MEW Companies
Allocation Areas, Soil and Groundwater**

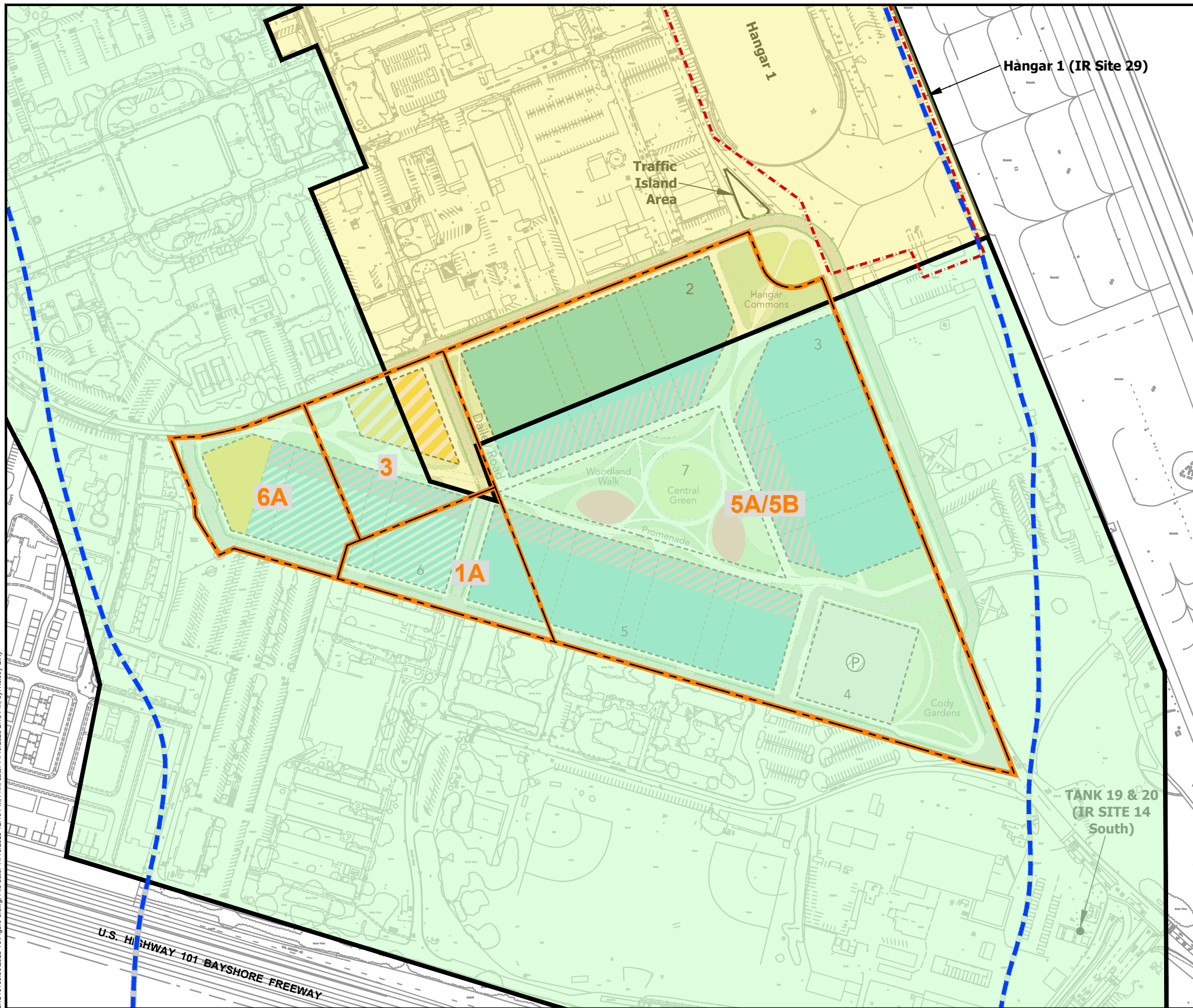


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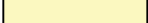
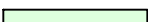
Figure 4

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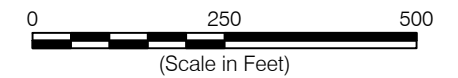
-  Premises as Defined in the Environmental Issues Management Plan (Note 2)
-  MEW Vapor Intrusion Study Area
-  NAVY Area of Responsibility
-  MEW Companies Area of Responsibility

Abbreviations:

- MEW = Middlefield-Ellis-Whisman
- TCE = Trichloroethene
- TPH = Total petroleum Hydrocarbons
- VOC = Volatile Organic Compound

Notes:

1. All locations are approximate.
2. Parcel numbers from a prior planned development are shown for consistency with prior environmental reporting.
3. "Areas of Responsibility" obtained from the U.S. EPA Vapor Intrusion Study Area North of U.S. Highway 101 - Moffett Field Area, dated December 2011. The Vapor Intrusion Study Area is defined as being the area in which TCE concentrations are >5 micrograms per liter ("ug/L") based on 2022 data from the site.



**NASA, Navy, and MEW Companies
Areas of Responsibility, Vapor Intrusion**



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Figure 5