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Thank you for the opportunity to comment on the April 2026 Draft Environmental Impact Report/Environmental Impact Statement (DEIR/EIS) for the Berkeley Space Center (BSC) (NASA Docket NASA-24-0002). With more time, I could address other aspects of the document, but due to inadequate public notice I am forced to focus on three areas:

1. DEIR/EIS fails to consider the provision of adequate employee housing on or near the BSC site.
2. It provides insufficient discussion of options for providing public safety services on the site.
3. The hazardous materials sections of the document is strong, but plans for additional investigation of TCE in soil gas and PFAS in soil could be clarified.

Before I begin, I want to make clear that I value the scientific work of NASA Ames and its partners, and I appreciate the role its employees and contractors play in our community. I have long supported the creation of a satellite university campus at the NASA Research Park, but the current proposal appears to reduce the educational space and significantly increase the office/research and development space from previously announced plans.

Housing

The most serious flaw in the proposed preferred alternative is the planned aggravation of the jobs-housing imbalance. The DEIR/EIS states (page 54 of PDF), “NASA could achieve an improved balance for NASA ARC through subsequent projects, given that there are no feasible mitigation measures for the Project Proponent to provide additional housing at the Project Site, the impact related to a jobs/housing imbalance would be significant and

unavoidable." This is a major reason that the impacts on traffic—both level of service and vehicle miles traveled—are also found to be "significant and unavoidable."

To avoid those impacts, NASA and UC Berkeley should propose and evaluate additional alternatives that balance employment growth with the development of housing on or near the BSC site. To provide that balance, the plan could reduce the office/R&D space to earlier levels and either include housing in the project or condition construction on the development of housing on the adjacent parcel previously set aside for Mountain View Housing Ventures.

According to the DEIR/EIS, the preferred development alternative would create nearly 6,000 new jobs and 145 housing units, creating demand for 4,276 new households. The housing shortfall is not just a mathematic calculation. It will add to the existing housing and transportation crisis that not only impacts current residents and commuters but also threatens the long-term economic vitality of Silicon Valley.

The document suggests that 8% of the new employees would live in Mountain View. That 8%, if accurate, would drive up already high home prices, making them more unaffordable to first-time homebuyers, and residential rents, pushing more long-term residents into homelessness or vehicle residency.

Even those who may end up living across the 101 freeway in Mountain View would burden commute-time traffic in local intersections, while those who commute further would flood already jammed freeways and expressways. According to the authoritative Silicon Valley Index 2026, "Daily freeway congestion increased in 2025, with Silicon Valley commuters losing a collective 52,700 hours to traffic each day — up 17% from the prior year.... In 2024, about 5% of workers were megacommuters traveling more than three hours daily."[1]

In an apparent effort to play down the traffic impact, the DEIR/EIS notes that the BSC parcel is a half mile from the NASA Bayshore Light Rail Station. Unfortunately, that station only serves 27 passengers each workday.[2]

Mountain View has recognized these challenges for years. The city's 2023 Housing Element, cited in the DEIR/EIS of PDF, states, "Mountain View has both a jobs-housing imbalance, reflected in a high ratio of jobs relative to housing units, and a jobs-housing mismatch, with housing costs that are not aligned with the incomes for a portion of the workers that work in Mountain View."[3] The city has responded by planning for numerous subsidized and market-rate housing developments. The current BSC proposal would undermine the progress that Mountain View and some of its neighbors have made.

Perhaps UC Berkeley should learn from the Stanford University General Use Plan (GUP). Stanford, like the NASA Research Park, is located in Unincorporated Santa Clara County.

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[1] Silicon Valley Index 2026 https://jointventure.org/download-the-2026-index pp. 62-63

[2] https://data.vta.org/pages/ridership-by-stop (Click on Bayshore NASA Station)

[3] https://www.mountainview.gov/home/showpublisheddocument/6471/639114727545700000, page 109

However, because it is not Federal property, it is subject to the planning authority of the County Board of Supervisors. As Stanford renewed its GUP, the Board required the University to provide on-site housing and contribute to a regional housing fund. Eight million dollars of that fund was recently provided to Mountain View's downtown Corso affordable housing project.

The County Board does not have jurisdiction over Moffett Field, but that does not eliminate NASA's obligation to address the jobs-housing imbalance.

Achieving balance in jobs vs. housing is feasible. It appears to match what was previously promised in the Ames Development Plan. The DEIR/EIS explains: "the amount proposed Student/Faculty Housing under the proposed project is less than the remaining unallocated space for housing programmed in the NADP for NASA ARC. However, the amount of proposed employment-generating land uses (i.e., approximately 2 million square feet of Research and Office Uses) is greater than the employment-generating development intensity NASA allocated for the proposed project (i.e., approximately 500,000 square feet of office/high density R&D, 514,700 square feet of educational uses, and 144,200 square feet of retail/support uses) and is greater than the remaining unallocated space for office/high density R&D programmed in the NADP for NASA ARC." (p. 832 of PDF) Note that the 514,700 square feet for educational uses have been dropped. As recently as October 2023, NASA and UC told the press that the project would include 1.4 million square feet of mixed use and 300 housing units.[4]

Public Safety Services

(I was assisted in preparing this section of my comments by Bill Berry, former NASA Ames Deputy Director and former Director Silicon Valley Initiatives and President University Associates Silicon Valley LLC.)

The expansion of non-Federal activity at Ames/Moffett should prompt a fresh look at the provision of police and fire services at the proposal BSC as well as the adjacent parcel previously leased to Mountain View Housing Ventures. The DEIR summarized, "services for the Project Site would be provided by the National Aeronautics and Space Administration Ames Research Center (NASA ARC) through a contract service via the NASA/ARC Protective Services Contract—South Region. In addition, fire protection and emergency medical services for the Project Site would continue to be provided by NASA Ames Fire Department and the County of Santa Clara Emergency Medical Services Agency." (page 709 of PDF)

While these services have been appropriate for current activities at NASA Ames, the EIR should consider alternatives, such as negotiating memoranda of understanding with the City of Mountain View. Scaling up a federal security contract workforce to manage domestic municipal policing (e.g., civilian property crimes, domestic disputes) for

[4] See https://www.mv-voice.com/news/2023/10/16/uc-berkeley-plans-to-build-2-billion-research-center-at-nasas-moffett-field/ .

thousands of non-federal employees and residents steps outside established agency authority. Moreover, private federal security contractors do not possess California peace officer powers. They lack the legal authority to enforce the California Penal Code or Vehicle Code against civilian populations in private leaseholds.

Moreover, under standard state mutual aid protocols the Mountain View Police Department (MVPD) will be required to provide tactical backup for high-risk incidents, manage major off-site traffic control bottlenecks along the Ellis Street/Manila Avenue corridor during large-scale regional events, and assist with complex joint criminal investigations that cross the boundary line between federal/state land and the City of Mountain View.

Therefore, the Final EIR/EIS should include a draft framework for a Law Enforcement Memorandum of Understanding among the University of California, NASA Ames, and the Mountain View Police Department. This framework must explicitly define geographic boundaries, establish financial reimbursement structures for municipal mutual aid assistance during major regional events, and outline joint operational protocols for managing complex investigations that span the boundary of the city and federal/state land.

Similarly, it is my understanding that NASA's existing fire services are principally configured for airfield crash/fire/rescue operations. Higher density structures planned for BSC, as well as the housing that I advocate, require adherence to the California Fire Code and specialized municipal equipment (e.g., ladder operations) that federal contracts are not structurally designed to support.

Furthermore, based on the assumption that space science research at BSC may involve the use and storage of hazardous substances, it may prove more efficient and protective to arrange for the Mountain View Fire Department to take responsibility for implementing California's Accidental Release Program as well as the city's own Hazardous Materials Storage Ordinance.

Arranging police and fire partnerships among the University of California, NASA Ames, and the city of Mountain View will require a careful delineation of jurisdiction and responsibilities. I no longer speak for the city, but when I was an elected official I noticed the strong interest by city leadership in achieving such agreements.

Formalizing these partnerships would be in the public interest: integrating what was long a Navy base and federal enclave into our community for mutual benefit.

Soil and Groundwater Contamination

I have been monitoring the environmental cleanup at Moffett Field since the late 1980s, so I have focused much of my hasty review on the Hazardous Materials section of the DEIS/EIS, the Spring 2026 Environmental Issues Management Plan (EIMP) prepared by EKI consultants (Appendix 2-2), and Appendix 3.9-1, Hazardous Materials Conditions. I have been assisted by Peter Strauss, CPEO's EPA Technical Assistance Grant Consultant for the MEW Superfund Study Area, which includes the project site.

NASA's environmental staff has a long history of professional practices in addressing surface and subsurface contamination released by the Navy as well as NASA itself, and these documents are no exception. The final documents should clarify the need for additional investigation.

Specifically, the EIMP (Appendix 2-2) is comprehensive and it lays out the environmental issues at the proposed site. It states that the Project Developer or the Responsible Parties, working under the guidance of EPA, will prepare and conduct a soil gas and shallow groundwater investigation. **This will be used to determine if the property requires additional cleanup before construction begins.** This is what EPA required at 277 Fairchild Drive, south of U.S. 101. The recent level of TCE contamination in groundwater was reported as high 570 micrograms per liter (ug/L), but there is no reported value for soil gas. The EIMP and the main EIR/EIS should provide soil gas data for the entire project site or at least explain how and when such data will be obtained. EPA has established that additional groundwater cleanup will be required before a new building is constructed if TCE levels in groundwater exceed 1,500 ug/L. The EIMP as well as the main EIR/EIS should provide a comparable goal for soil gas and explain how and when such data will be obtained.

Additionally, the EIMP notes that PFAS compounds were found in groundwater at the site exceeding California and federal drinking water standards. The EIMP states (page 2-22), "NASA staff have indicated that PFAS will be assessed further through the CERCLA process." Please confirm that soil at the project site will be sampled for total PFAS as well as individual compounds and that any level above those found in Target Concentration Levels will be treated and handled according to EPA and California requirements. **The EIMP and EIR/EIS should state this explicitly.**

Submitted by CPEO Executive Director, Lenny Siegel
June 9, 2026