

NASA AMES DEVELOPMENT PLAN

FINAL PROGRAMMATIC

Environmental Impact Statement



APPENDIX A:Relationship of General Plans and Zoning to Proposed Alternatives

NASA AMES RESEARCH CENTER

JULY 2002



DESIGN, COMMUNITY & ENVIRONMENT

NASA AMES DEVELOPMENT PLAN

FINAL PROGRAMMATIC

Environmental Impact Statement

APPENDIX A

NASA AMES RESEARCH CENTER



JULY 2002

MANAGED BY

 DANIEL, MANN, JOHNSON
 MENDENHALL

 394 PACIFIC AVENUE, THIRD FLOOR
 TEL: 415 986 1373

 SAN FRANCISCO, CALIFORNIA 94111-1718
 FAX: 415 986 4886



PREPARED BY

 DESIGN,
 COMMUNITY
 & ENVIRONMENT

 1600 SHATTUCK AVENUE, SUITE 222
 TEL: 510 848 3815

 BERKELEY, CALIFORNIA 94709
 FAX: 510 848 4315

in association with Fehr & Peers Associates, Inc. Nelson Nygaard Illingworth & Rodkin Jones & Stokes Dr. Lynne Trulio Brian Kangas Foulk Bay Area Economics

TABLE OF CONTENTS

Α.	Santa Clara County General Plan and Zoning
Β.	Mountain View General Plan
С,	Sunnyvale General Plan
D.	Stevens Creek: A Plan of Opportunities, Comprehensive Use and Management Guidelines
E.	City of San Jose General Plan
F.	Bay Conservation and Development Commission Bay Plan 15
G.	Metropolitan Transportation Commission 1994 Regional Airport System Plan

i

N A SA AMES RESEARCH CENTER NASA AMES DEVELOPMENT PLAN FINAL PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT APPENDIX A: TABLE OF CONTENTS

ii

APPENDIX A

RELATIONSHIP OF GENERAL PLANS AND ZONING TO PROPOSED ALTERNATIVES

A. Santa Clara County General Plan and Zoning

The Elements of the Santa Clara County General Plan that are relevant to the NADP are the Transportation, Resource Conservation, and Health and Safety Elements, as described in Chapter 3 of this EIS. This section discusses the relationship between the Elements of the Santa Clara County General Plan and the County's zoning and each of the five proposed alternatives.

1. Transportation Element

The Transportation Element of the Santa Clara County General Plan focuses on various goals, strategies, and policies intended to improve the adequacy of the overall transportation system within the county. The goals that are relevant to the NADP focus on increasing the proximity between housing and employment opportunities, reducing automobile dependancy, promoting transportation demand measures, and promoting urban development that supports the use of alternative modes of transportation, including pedestrian and bicycle activity.

- Because Alternative 1 would not include changes in NASA's transportation policies or facilities, or improvements to the surrounding transportation network, it would not address the policies outlined in the Transportation Element of the Santa Clara County General Plan.
- ◆ Alternatives 2 through 5, including Mitigated Alternative 5, would conform to the Transportation Element's goal of promoting transportation demand measures by extending NASA's existing TDM measures to the proposed development under the NADP.
- Alternatives 2 through 5, including Mitigated Alternative 5, would conform with the Transportation Element's goals of developing housing near employment centers and reducing automobile dependency because they would involve the creation of new housing as well as new jobs.
- Alternatives 2 through 5, including Mitigated Alternative 5, would conform with the County's goal of promoting alternative modes of transportation because substantial improvements would be made to the existing bicycle and pedestrian systems at the Ames Research center.

These potential transportation and housing impacts are analyzed in Sections 4.3 and 4.14.

2. Resource Conservation Element

The Resource Conservation Element of the Santa Clara County General Plan focuses on water and energy conservation, solid waste management, and the preservation of agricultural and mineral resources, habitat and biodiversity, and historic and scenic resources.

- ◆ Alternative 1 would be compatible with policies that relate to the promotion of water and energy conservation, and waste reduction because the daily population at the Ames Research Center would remain relatively stable and there would be no increase in demand for these resources. Alternatives 2 through 5, including Mitigated Alternative 5, could conflict with policies about water and energy conservation or waste reduction because new development and visitor attractions could create a substantial increase in waste generation and in demand for energy and water resources. However, conservation policies and sustainable building guidelines have been incorporated into all action alternatives.
- ◆ Under Alternative 1, there would be no new construction that could potentially block existing views and view corridors, and therefore no impacts on scenic resources. Under Alternatives 2 through 5, including Mitigated Alternative 5, new construction could significantly impact existing views of and through the Ames Research Center.
- ◆ Alternative 1 would conform with County policies regarding the preservation of historic resources because no historic buildings would be demolished, and no infill development would mar the integrity of the Shenandoah Plaza Historical District. Under Alternatives 2 through 5, no historic buildings would be demolished. Most of the non-contributing buildings within the Historic District would be removed, and there would be a substantial amount of new infill development . Under all action alternatives, historic structures at the Ames Research Center would be rehabilitated and reused, which could damage their historical integrity.

- Because there would be no construction or demolition under Alternative

 there would be no potential for disturbing sub-surface archaeological
 resources. Under Alternatives 2 through 5, including Mitigated
 Alternative 5, there would be a potential for new construction or
 demolition to disturb sub-surface archaeological resources.
- Alternative 1 would be compatible with policies relating to the protection of wildlife habitat because there would be no encroachment on existing habitat. Under Alternatives 2 through 5, including Mitigated Alternative 5, preserves would be set aside to protect burrowing owls, but there could still be some impacts on habitat.

These potential impacts are analyzed fully in Sections 4.5, 4.6, 4.9 and 4.11 of this EIS.

3. Health and Safety Element

The Health and Safety Element of the Santa Clara County General Plan includes sections on air quality, hazardous materials, noise, natural hazards, and aviation safety. The goals of the Health and Safety Element that are relevant to the NADP focus on managing hazardous materials and controlling noise impacts.

- All action alternatives would have the potential to conflict with County policies regarding the management of hazardous materials because they would include new laboratory space where hazardous materials might be used.
- Alternative 1 would conform with County policies about controlling noise impacts because there would be no new uses which could cause noise impacts, and there would be no indirect noise impacts caused by new traffic to the Ames Research Center. Under Alternative 2 through 5, including Mitigated Alternative 5, no new uses would be introduced that could cause noise impacts. Automobile trips generated by new uses could cause indirect noise impacts.

These potential impacts are analyzed in Sections 4.4, 4.7, 4.8 and 4.10 of this document.

4. Zoning

The Ames Research Center is located in the unincorporated area of Santa Clara County. The Santa Clara County Planning Department has zoned the Ames Research Center as a combination of agricultural, general use, and general commercial, as described above in Chapter 3 of this EIS. The existing uses at the Ames Research Center do not conform to this zoning. Development proposed under Alternatives 2 through 5, including Mitigated Alternative 5, would continue this conflict. Because the Ames Research Center is a federal facility, it is not required to conform to local zoning, so this is not a significant impact.

B. Mountain View General Plan

The Elements within the Mountain View General Plan relevant to the NADP include: Land Use, Circulation, Residential Neighborhoods, and Environmental Management, as described in Chapter 3 of this EIS. This section discusses the relationship between the Elements of the Mountain View General Plan and the proposed alternatives.

1. Land Use Element

The Land Use Element of the Mountain View General Plan focuses on issues relating to new development and its relationship to natural hazards, hazardous materials, the protection of historic resources and the natural environment, the preservation and enhancement of quality of life for Mountain View residents, and the coordination of land uses within the city. The goals of the Land Use Element that are relevant to the NADP focus on ensuring that new development is built and located to minimize impacts from natural and man-made hazards, such as airfield noise; the protection of landmark buildings, such as the Hangars; the protection of the natural environment through land use

compatibility and mitigation measures; the promotion of safe physical access to natural resources in the city, including the creation of a road link between the North Bayshore area and the entrance to the Ames Research Center; the protection of the city's major institutional facilities; the pursuit of educational and cultural opportunities for the community; and the promotion of a jobs/housing balance.

The alternatives would relate to Mountain View's land use policies in the following ways:

- ◆ Alternative 1 would be compatible with Mountain View policies that relate to man-made hazards such as noise because there would be no new development in close proximity to existing sources of noise at the Ames Research Center. Alternatives 2 through 5, including Mitigated Alternative 5, could conflict with Mountain View policies about minimizing the risks from man-made hazards because they would create a substantial amount of new development in close proximity to existing noise sources within the Ames Research Center such as the airfield and the wind tunnels. None of the action alternatives would include the development of new sources of noise.
- All action alternatives would be compatible with Mountain View policies relating to the protection of landmark buildings because they would preserve all of the historic structures at the Ames Research Center, including the Hangars.
- The action alternatives' compatibility with Mountain View policies about using land use decisions to protect the natural environment is discussed in depth in Chapter 4 of this EIS.
- None of the alternatives would involve the creation of a road link between the North Bayshore Area and Moffett Boulevard.
- ◆ Alternatives 1 through 5, including Mitigated Alternative 5, would be compatible with this policy because new educational and cultural opportunities would be developed under the CUPEA in Alternative 1, and

enhanced in the other alternatives, including most notably the California Air and Space Center.

 Alternatives 2 through 5, including Mitigated Alternative 5, would be compatible with Mountain View policies about improving the jobs/housing balance to different degrees since they would each involve the creation of both jobs and housing.

These potential impacts are analyzed in Chapter 4 of this EIS.

2. Circulation Element

The Circulation Element of the Mountain View General Plan focuses on issues relating to the network of freeways, roads, and public transit, bicycle and pedestrian routes, with the goal of making the network as effective as possible while preserving quality of life and protecting the environment. The goals of the Circulation Element that are relevant to the NADP focus on improving the connection between land use and transportation, promoting transportation demand management programs at work sites, improving safety and traffic flow through congested intersections, and promoting alternative modes of transportation.

The action alternatives relate to Mountain View's circulation policies in the following ways:

- Alternatives 2 through 5, including Mitigated Alternative 5, would conform to these policies because dense development would be located in close proximity to the new light rail station.
- Alternatives 2 through 5, including Mitigated Alternative 5, would be compatible with policies that relate to transportation demand management because existing TDM measures would remain in place and a new more comprehensive TDM program would be instituted to reduce single occupancy vehicle trips by 22 per cent.
- Alternatives 2 through 5, including Mitigated Alternative 5, could conflict with policies that relate to improving traffic congestion because they

N A S A A M E S R E S E A R C H C E N T E R N A S A A M E S D E V E L O P M E N T P L A N F I N A L P R O G R A M M A T I C E N V I R O N M E N T A L I M P A C T S T A T E M E N T A P P E N D I X A R E L A T I O N S H I P O F G E N E R A L P L A N M Z O N I N G T O PROPOSED ALTERNATIVES

would generate substantial numbers of new trips even with the aggressive TDM program proposed.

• Alternatives 2 through 5, including Mitigated Alternative 5, would conform with Mountain View's goal of promoting alternative modes of transportation because there would be substantial improvements to the bicycle and pedestrian circulation systems within and through the Ames Research Center.

These potential impacts are analyzed in Section 4.3 of this EIS.

3. Residential Neighborhoods Element

The intent of the Residential Neighborhoods Element of the Mountain View General Plan is to preserve and protect neighborhoods while finding ways to meet community and regional housing needs. The goals of the Residential Neighborhoods Element that are relevant to the NADP focus on the provision of a variety of housing types and prices. Alternatives 2 through 5, including Mitigated Alternative 5, would conform with the Mountain View policy of providing a range of housing types to varying degrees because each includes the construction of new housing.

This potential impact is analyzed in Section 4.14 of this EIS.

4. Environmental Management Element

The Environmental Management Element of the Mountain View General Plan defines primary methods for putting the City of Mountain View's environmental policies into action. The goals of the Environmental Management Element relevant to the NADP focus on issues relating to the improvement of open space and air quality, noise control, resource conservation, natural habitat protection, and hazardous material clean up and management.

The five alternatives would relate to Mountain View's environmental management policy in the following ways:

- Alternative 1 would not conform with City policy regarding the improvement of open space because no new open space would be created, none would be improved, and the existing open space at the Ames Research Center would remain closed to the public. Some existing passive open space in the Bay View area would be developed under Alternatives 2, 4, 5 and Mitigated Alternative 5. Under Alternatives 2 through 5, including Mitigated Alternative 5, some new open space would be created in areas that would be opened to the public.
- Alternative 1 would be compatible with noise control policies because there would be no new development in close proximity to existing noise sources. Alternatives 2 through 5, including Mitigated Alternative 5, could conflict with City policies about controlling noise exposure because they would create substantial amounts of new development respectively in close proximity to existing noise sources within the Ames Research Center such as the airfield and the wind tunnels. No new noise sources would be constructed under any of the five alternatives.
- Alternative 1 would be compatible with policies that relate to the promotion of waste reduction, water conservation, and energy conservation because the daily population at the Ames Research Center would remain relatively stable and there would be no increase in demand for these resources. Alternatives 2 through 5, including Mitigated Alternative 5, could conflict with policies about resource conservation because new development and visitor attractions could create a substantial increase in demand for energy and water resources and generation of waste. However, conservation policies and sustainable building guidelines have been incorporated into all action alternatives.
- Under Alternative 1, there would be no new construction above the baseline and so no encroachment on existing habitat. Alternatives 2 through 5, including Mitigated Alternative 5, involve new construction, and so could impact existing habitat.

- None of the alternatives would introduce new uses with direct air quality impacts, but all action alternatives could have indirect impacts on air quality through construction and vehicular traffic generated by new development.
- All action alternatives could conflict with Mountain View policies relating to hazardous material clean up and management because they would include new laboratory space where hazardous materials might be used.

These potential impacts are analyzed in Sections 4.2, 4.4, 4.7, 4.9 and 4.10 of this EIS.

C. Sunnyvale General Plan

The Elements and Sub-elements of the Sunnyvale General Plan that are relevant to the NADP are: Land Use and Transportation, Open Space, Housing and Community Revitalization, Seismic Safety, Community Design, and Environmental Management, as described in Chapter 3 of this EIS. This section discusses the relationship between the Elements of the Sunnyvale General Plan and the five proposed alternatives for the NADP.

1. Land Use and Transportation Element

The Land Use and Transportation Element of the Sunnyvale General Plan focuses on four broad areas: housing, the economy, transportation, and community character. The goals of the Land Use and Transportation Element relevant to the NADP focus on policies and actions that address the reduction of single occupant vehicle use, the promotion of alternative modes of transportation, and the promotion of land use planning that supports transportation systems.

The five alternatives relate to Sunnyvale's land use and transportation policy in the following ways:

- ◆ Alternative 1 would be compatible with policies relating to single occupant vehicle use because there would be no new development, and thus no increase in trip generation. Alternatives 2 through 5, including Mitigated Alternative 5, would be compatible with policies that relate to the reduction of single occupant vehicle use because the existing TDM program at the Ames Research Center would be expanded and would apply to all proposed new development.
- ◆ Alternative 1 would conflict with the goal of promoting alternative modes of transportation because no improvements would be made to bicycle and pedestrian facilities at the Ames Research Center. Alternatives 2 through 5, including Mitigated Alternative 5, would conform with Sunnyvale policy regarding the promotion of alternative modes of transportation because all would involve extensive improvements to bicycle and pedestrian facilities at the Ames Research Center.
- ◆ Under Alternative 1, the undeveloped land adjacent to the new light rail station in the NRP area would remain vacant. This would conflict with the Sunnyvale Land Use and Transportation policies promoting development in close proximity to transportation facilities. Under Alternatives 2 and 5, including Mitigated Alternative 5, dense new development would be located in the areas closest to the new light rail station as recommended by Sunnyvale policy.

These potential impacts are analyzed in Sections 4.2 and 4.3 of this EIS.

2. Open Space Sub-Element

The Open Space Sub-Element of the Sunnyvale General Plan focuses on policies that enhance and increase open space in Sunnyvale. The goal of the Open Space Sub-Element relevant to the NADP focuses on encouraging efforts to preserve, develop, operate, and maintain open space and recreational facilities that are available to people who live, work or visit Sunnyvale.

The alternatives would relate to Sunnyvale's open space policies in the following ways:

- Alternative 1 would not be compatible with Sunnyvale's open space policy because even though existing open space would be preserved, it would remain closed to the public.
- Alternatives 2 through 5, including Mitigated Alternative 5, would be compatible with Sunnyvale's open space policy because they would create new open space in areas open to the public.

This potential impact is analyzed in Section 4.12 of this EIS.

3. Housing and Community Revitalization Sub-Element

The Housing and Community Revitalization Sub-Element of the Sunnyvale General Plan addresses housing issues and neighborhood quality, and attempts to preserve and enhance Sunnyvale's residential, commercial, and industrial areas. The goals of the Housing and Community Revitalization Element that are relevant to the NADP focus on efforts to improve the existing housing to jobs ratio and the diversity of housing types and locations.

Alternatives 2 through 5, including Mitigated Alternative 5, would conform to varying degrees with Sunnyvale policies about improving the existing jobs/housing balance and promoting a diversity of housing types, because they each involve the construction of new housing units.

This potential impact is analyzed in Section 4.14 of this EIS.

4. Seismic Safety Sub-Element

The Seismic Safety Sub-Element of the Sunnyvale General Plan focuses on safety issues related to seismic hazards, severe weather hazards, fire hazards, aviation hazards and hazardous materials. The goals of the Seismic Safety Sub-Element relevant to the NADP focus on the consideration of seismic hazards

in developing land use policies, and the protection of life from hazardous materials.

- ◆ Alternative 1 would not conflict with Sunnyvale seismic safety policy because no new buildings would be exposed to San Francisco Bay Area seismic hazards. Alternatives 2 through 5, including Mitigated Alternative 5, would not conflict with Sunnyvale policies regarding seismic hazards because even though they propose substantial amounts of new development, new buildings would not be exposed to levels of seismic hazards unusual in the Bay Area.
- ◆ All action alternatives could conflict with Sunnyvale policy regarding exposure to hazardous materials because each would include new laboratory space where hazardous materials might be used, and new construction in areas with known and potential soil and groundwater contamination.

These potential impacts are analyzed in Sections 4.7 and 4.8 of this EIS.

5. Community Design Sub-Element

The purpose of the Community Design Sub-Element of the Sunnyvale General Plan is to establish design policies to guide future growth in Sunnyvale and to enhance existing development. The goals of the Community Design Sub-Element relevant to the NADP focus on the compatibility of new development with surrounding residential neighborhoods, the preservation of buildings with historic value, and the preservation of mature trees and landscaping.

The alternatives would relate to Sunnyvale's community design policy in the following ways:

◆ Alternative 1 would be compatible with Sunnyvale's policy about preventing conflicts between residential and adjacent land uses because it would not introduce any land uses into the Ames Research Center incompatible with residential development. Alternatives 2 through 5, including Mitigated Alternative 5, would not introduce new uses

incompatible with residential uses, but they would introduce residential uses into areas where there could be conflicts, especially in terms of noise and exposure to hazardous materials.

- Under all of the action alternatives, all of the historic buildings at the Ames Research Center would be preserved. However, Alternatives 2 through 5, including Mitigated Alternative 5, propose the rehabilitation and reuse of many of the historic buildings within the Ames Research Center, which could affect their integrity.
- Alternative 1 would be compatible with Sunnyvale's tree protection policy because there would be no development beyond baseline conditions and thus no impacts on protected trees. Alternatives 2 through 5, including Mitigated Alternative 5, would conflict with policies relating to protected trees because the reconfiguration of roadways, building demolition and/or construction would make tree preservation difficult.

This potential impact is addressed in Sections 4.11 and 4.13 of this EIS.

6. Environmental Management Element

The Environmental Management Element of the Sunnyvale General Plan has six sub-elements that focus on water and energy conservation, management of solid waste, sanitary sewers and surface runoff, noise control, and air quality. The goals of the Environmental Management Element relevant to the NADP focus on promoting water and energy conservation measures, minimizing the generation of pollutants and runoff, treating sewage, controlling noise, and improving air quality.

◆ Alternative 1 would be compatible with policies relating to the conservation of water and energy and treatment of sewage because it would not generate any demand for additional services above the baseline. Alternatives 2 through 5, including Mitigated Alternative 5, could conflict with policies regarding water and energy conservation and sewage treatment because new development would create a substantial increase in demand for resources and services. However, each of these alternatives

includes conservation policies and sustainable design guidelines to minimize utility and service demands.

- ◆ Alternative 1 would be compatible with the policies that relate to the minimization of pollutants and runoff because no new pollutants would be generated. Alternatives 2 through 5, including Mitigated Alternative 5, could conflict with Sunnyvale policy about pollutants and runoff because new development could generate more pollutants. In addition, Alternatives 1, 2, 4 and 5, including Mitigated Alternative 5, could generate more total runoff. However, the structural elements proposed for the revised storm drain system will limit the peak runoff to the existing condition and, along with the BMPs NASA will incorporate into the Design Guidelines for the development proposed under the NADP, will reduce the discharge of pollutants to the maximum extent practicable.
- None of the alternatives would introduce any new sources of noise to the Ames Research Center. Alternatives 2 through 5 (including Mitigated Alternative 5), however, would generate substantial amounts of automobile traffic and construction, which could create a significant noise impact.
- None of the alternatives would introduce any new generators of pollutants that would impact air quality at the Ames Research Center. Alternatives 2 through 5 (including Mitigated Alternative 5), however, would generate substantial amounts of new automobile trips and construction, which could generate a significant air quality impact.

These potential impacts are analyzed in Sections 4.4, 4.6 and 4.10 of this EIS.

D. Stevens Creek : A Plan of Opportunities, Comprehensive Use and Management Guidelines

The element of the Stevens Creek Plan that is relevant to the NADP is the basic plan for the MROSD's Stevens Creek Shoreline Nature Study area, which

comprises the western portion of the SWRP. The plan proposes to restore tidal action to the Area, and acknowledges that some flood containment to the east of the refuge may be necessary.

◆ Alternatives 1 through 5, including Mitigated Alternative 5, conflict with this plan because they all include a pumping station in the northwest corner of the SWRP, to pump stormwater to Stevens Creek when necessary to prevent flooding. This is an existing incompatible use. Implementation of Alternatives 2 through 5, including Mitigated Alternative 5, would not cause any additional incompatibility. If the MROSD implements its plan to breach the existing eastern dike along Stevens Creek, and to construct a new eastside levee east of their refuge, then NASA would relocate its stormwater pump.

E. City of San Jose General Plan

Ames Research Center is not within the City of San Jose, and there are no policies in the City of San Jose General Plan that refer directly to Ames Research Center.

San Jose City Council Resolution 66096, dated June 27, 1995, urged the federal government to continue the then-current operations of Moffett Field and Ames Research Center. The resolution also stated that, if federal operation of Moffett Field is discontinued, the City will seek to ensure that the facility is retained as a civil airfield. Since none of the alternatives would alter the existing operation of Moffett Field as a closed federal airfield, there would be no conflict with this resolution.

F. Bay Conservation and Development Commission Bay Plan

The Bay Conservation and Development Commission (BCDC) is a Statecreated regional agency with jurisdiction over land uses adjacent to San

Francisco Bay, whose authority was created by the McAteer-Petris Act. BCDC's *San Francisco Bay Plan* contains the Commission's enforceable policies and includes Bay Plan Maps on which it designates shoreline areas reserved for high priority uses such as airports and seaports.

The federal Coastal Zone Management Act requires federal actions that affect the coastal zone to be consistent, to the maximum extent practicable, with approved State or local coastal zone plans. The BCDC's Bay Plan is the approved coastal zone plan for the San Francisco Bay Area. Bay Plan Map 7 designates Moffett Field as an "Airport Priority Use Area". The Plan Map policy note regarding this area supports consideration of commercial aviation at Moffett Field when restricted military use is no longer needed. The note also states that Moffett Naval Air Station is not within BCDC permit jurisdiction.

On April 12, 2002, NASA submitted a consistency determination to BCDC analyzing the extent to which the elements of the proposed NADP would be consistent with adopted BCDC policies. This determination examined several issues:

- Fish and Wildlife: The consistency determination found that the NADP would not have any impact on water volume, surface area, or the fresh water inflow into the Bay, nor would it cause a significant decrease in water quality.
- Marshes and Mudflats: Implementation of the NADP would not result in any filling or diking of marshes or mudflats.
- Transportation: The NADP would not affect plans for a Bay Ferry terminal at Moffett Field. NASA would implement an aggressive TDM program to mitigate the traffic impacts of the NADP.
- Public Access: NASA has signed a planning Memorandum of Agreement with the Association of Bay Area Governments, stating that NASA will grant an easement for the construction of a portion of the Bay Trail along

and through the northern border of Moffett Field. The construction of the Bay Trail would be subject to separate environmental review.

◆ Plan Map 7 Priority Use Area: Implementation of the proposed NADP would not change existing airfield use, and would not conflict with the airfield use previously found to be consistent with the Bay Plan pursuant to NASA's CUP in 1994 (Consistency Determination No. CN 7-94). Review of the proposed NADP shows that no new construction would violate or affect the navigable airspace. Pursuant to the NADP, airfield security would be maintained in the same form and condition as proposed in the 1994 CUP, which was found to be consistent with the Bay Plan. Housing proposed in the NRP and Bay View would be in areas where noise exposure is less than 65 dB CNEL, based on current airfield operations, and based on the level of airfield operations proposed in NASA's Comprehensive Use Plan of 1994, which was found to be consistent with the Bay Plan.

The consistency determination concluded that the proposed NADP is consistent to the maximum extent practicable with the San Francisco Bay Plan, the McAteer-Petris Act and the Coastal Zone Management Act. On May 29, NASA submitted additional information to BCDC, in support of its consistency determination.

On May 29, 2002, NASA submitted a letter containing additional information to BCDC, in support of the consistency determination. This information included a summary of the expected impacts of the NADP in relation to Bay Plan policies. The letter presented several points of particular interest to BCDC including the following:

- The implementation of the NADP would not affect the water volume or surface area, or the fresh inflow into the Bay.
- Construction noise and traffic, with mitigation, are not expected to substantially impact threatened or endangered species.

- Runoff from construction sites and impervious surfaces is also not expected to result in significant impacts to fish and wildlife.
- Minimal impacts could potentially result from the presence of invasive plant species. However, this impact would be reduced by using native plant species and weed-free soil, and by field surveys.
- Implementation of the NADP would not result in any filling or diking of marshes or mudflats.
- The NADP would not interfere with the possible site at Moffett Field for Bay Ferry landing.
- NASA would implement an aggressive TDM project, which together with on-site housing, would result in a 46 percent reduction in single-occupancy vehicle trips.
- NASA has signed a Memorandum of Understanding with ABAG whereby NASA will later grant an easement for the construction of a portion of the Bay Trail along and through the northern border of Moffett Field.
- Implementation of the NADP would not change existing airfield use, and would not conflict with the airfield use previously found to be consistent with the Bay Plan pursuant to NASA's Comprehensive Use Plan (CUP) in 1994.
- Review of the proposed NADP shows that no new construction would violate or affect Moffett Field's navigable airspace.
- Pursuant to the NADP, airfield security would be maintained in the same form and condition as proposed in the 1994 CUP, which was found to be consistent with the Bay Plan.
- Housing proposed in the NRP and Bay View would be in areas where noise exposure is less than 65 dB CNEL, based on current airfield operations proposed in NASA's CUP, which, as stated above, was found to be consistent with the Bay Plan.

On July 9, 2002 NASA submitted additional information to BCDC, in support of the consistency determination. The submittal included the following:

- Illustrations of proposed NADP airfield noise contours and Hayward airport general aviation noise contours in relation to proposed NADP housing to show that NADP housing is compatible with the airfield.
- A commitment by NASA to build the new air traffic control tower before demolishing the old one, and to notify BCDC of any NADP changes that would significantly impact airport priority use or the coastal zone.

The BCDC Staff Report issued July 12, 2002 recommended that the Commission concur with NASA's conclusion that the NADP is consistent with the Bay Plan.

G. MTC 1994 Regional Airport System Plan

The Metropolitan Transportation Commission (MTC) is designated by the federal Secretary of Transportation as the metropolitan planning organization for the nine-county San Francisco Bay area. The MTC's Regional Airport System Plan (RASP), which was updated in 2000, retains a regional interest in potential civil aviation use of Moffett Field. Specifically, Recommendation 6 of RASP recommends that "the [RASP] protect future options by indicating a regional interest in civil aviation use ofMoffett Federal Airfield if th(is) facility becomes available in the future". Recommendation 6 further states that decisions that could foreclose future use of any airfield should be subjected to a focused study on the effect of such closure on local and regional aviation requirements.

The current airfield operation at Moffett Field is neither civilian-commercial nor military exclusive. However, for NADP planning purposes, FAA civilian standards have been applied. FAA standards and regulations are discussed in detail in Section 3.2, subsection C of the FEIS. Under the proposed NADP,

existing airfield uses would not change, and Moffett Field would continue to operate as a closed federal airfield. As stated in the additional information that NASA submitted to BCDC, the proposed NADP, of and by itself, does not foreclose future use of the airfield for civilian-commercial uses. Rather, increasing the use of the airfield would be incompatible with the existing Sunnyvale residential areas, with existing endangered California clapper rails, and would potentially violate the Clean Air Act, FAA safety standards and/or the National Historic Preservation Act. If proposed, this change in use would be subject to separate environmental review.