



**BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT**

May 3, 2021

Eric Luchini  
City of Pleasanton  
Community Development Department  
200 Old Bernal Avenue  
Pleasanton, CA 94566

RE: 10x Genomics Project – Mitigated Negative Declaration

Dear Mr. Luchini,

Bay Area Air Quality Management District (Air District) staff has reviewed the Mitigated Negative Declaration (MND) for the 10x Genomics Project (Project). The Project would redevelop a 14.75-acre site for commercial and office uses, research and development (R&D), and light laboratory manufacturing. Building 1 would consist of a 2- and 3-story, 150,000 square foot operations facility building. Building 2 would consist of up to a 4-story, 115,000 square foot R&D facility. Building 3 would consist of up to a 4-story 116,062 square foot R&D facility. In addition, the Project would include a maximum six-story parking structure with 1,168 parking stalls and a surface parking lot with 90 parking stalls.

Air District staff supports the City’s efforts to focus development near transit. In addition, Air District staff appreciates efforts to incorporate best management practices into the Project’s design to minimize air quality and climate impacts. The Air District recommends the following measures that can further reduce air pollution and greenhouse gas (GHG) emissions.

**Recommendations to Reduce Mobile Emissions**

Because the Project site is located 0.5 mile south of the West Dublin/Pleasanton BART Station, Air District staff strongly encourages the City to develop a Transportation Demand Management (TDM) Program to connect commuters from the BART Station to the Project site and discourage single occupancy vehicle (SOV) travel and associated air pollutant and GHG emissions. Given the Project site’s proximity to transit, TDM measures could include:

- Shuttle service between BART and the Project site;
- Incentives to encourage transit use, carpooling, vanpooling, and non-SOV travel;
- Carshare programs;
- Secure bicycle parking and shower/locker room facilities;
- Bike-share station;
- Transit subsidies, including subsidies for first/last mile (e.g., bike share, scooter share, ride share); and
- Safe and convenient pedestrian and bicyclist access to streets, sidewalks, bike paths, and public transit stops.

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Research shows that providing abundant, free parking encourages SOV travel. Air District staff recommends that the City decrease the amount of parking spaces and implement best practice parking strategies to reduce SOV travel and associated emissions, such as reduced parking requirements, shared parking, paid parking, employee parking cash-out, and car-share parking. Parking cash-out appears to be especially feasible here, as it is well suited to large suburban locations such as this project site and given the City of Pleasanton's past experience with parking cash-out programs.

Moreover, given the recent Executive Order N-79-20 to phase out gasoline cars and mandate 100 percent sales of new passenger vehicles to be zero-emission by 2035, as well as 100 percent of medium- and heavy-duty vehicles by 2045, it is critical that the Project accommodate the electric vehicle charging infrastructure necessary to reduce emissions from the transportation sector and accelerate zero-emission technology. According to the MND, no electric vehicle charging stations would be constructed for the Project. This is a profound missed opportunity and is not aligned with State goals to promote use of electric vehicles. To align with this new Executive Order and to be able to support increased use of electric vehicles, Air District staff recommends incorporating electric vehicle charging stations for at least 15 percent of parking spaces and EV ready spaces for at least 50 percent of parking spaces.

#### **Compliance with Air District Permitting Requirements**

The Air District is responsible for the issuance of air quality permits for stationary equipment in the Bay Area and the management of the resulting air emissions. Please note that certain equipment and operations (e.g., backup diesel generators, boilers, laboratories) will require the applicant to apply for an Air District Authority to Construct/Permit to Operate. If you have any questions regarding the Air District's permits, please contact Barry Young, Senior Advanced Projects Advisor, at [byoung@baaqmd.gov](mailto:byoung@baaqmd.gov) or (415) 940-9641 to discuss permit requirements.

Air District staff is available to assist the City in addressing these comments. If you have any questions or would like to discuss Air District recommendations further, please contact Josephine Fong, Environmental Planner, at (415) 749-8637 or [jfong@baaqmd.gov](mailto:jfong@baaqmd.gov).

Sincerely,



Greg Nudd  
Deputy Air Pollution Control Officer

cc: BAAQMD Secretary John J. Bauters  
BAAQMD Director Pauline Russo Cutter  
BAAQMD Director David Haubert  
BAAQMD Director Nate Miley