SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

# Clarifying Statement regarding BMP-2 Interpretation
## July 2022

### Introduction

In April 2020, the Sacramento Metropolitan Air Quality Management District adopted updated greenhouse gas (GHG) thresholds of significance for land use development project operational emissions to assist lead agencies in determining significance for proposed projects during CEQA review. Sacramento County subsequently adopted these thresholds for its own CEQA analysis efforts. The thresholds include showing consistency with the 2017 Climate Change Scoping Plan by implementing three Best Management Practices (BMPs). BMP 2 requires projects to be "EV Ready", stating "projects shall meet the current CalGreen Tier 2 standards, except all EV capable spaces shall be instead EV ready." This memo clarifies whether "current CalGreen" is defined by the Code in effect when the Notice of Preparation (NOP) was released for a project or the Code that will be in effect at the time of project building permits, which is when consistency with CalGreen is determined.

### Analysis

The Greenhouse Gas Thresholds for Sacramento County justification document[1] states that BMPs were developed to show consistency with the State's climate goals including the 2017 Climate Change Scoping Plan, 2030 GHG reduction targets, and the 2045 carbon neutrality goal. The justification document references a CA Energy Commission report[2] stating that more chargers are needed than are currently on-track to be installed to meet the State's 2025 targets to have 1.5 million EVs on the road in California, and even more will be needed to meet targets for 2030 and beyond. It is foreseeable that EV infrastructure requirements will change with future CalGreen codes to ensure sufficient infrastructure to support California's vehicle decarbonization goals. Beyond state targets, the 2020 SACOG MTP/SCS[3] requires that the Sacramento Region deploy EVs faster than the rest of the state, which would necessitate more zero emission vehicle infrastructure for the SACOG region than the State's overall projections to meet the SCS target reduction. To support this plan, deployment of EV infrastructure in the Sac Metro Air District will necessarily need to be beyond the baseline requirements for the State of California.

### Conclusion

Because the SACOG MTP/SCS assumes more zero emission vehicle infrastructure is needed to achieve SCS targets and the State projects that more chargers are needed than currently planned for to meet State climate goals, projects should use the CalGreen code that will be in effect when the project applies for its building permits.

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[1] Ramboll US Corporation, for the Sacramento Metropolitan Air Quality Management District. Greenhouse Gas Thresholds for Sacramento County. 3/4/2020. Available at http://www.airquality.org/LandUseTransportation/Documents/SMAQMDGHGThresholds2020-03-04v2.pdf. Accessed 7/6/22.

[2] National Renewable Energy Laboratory. 2018. California Plug-in Electric Vehicle Infrastructure Projections: 2017- 2025. California Energy Commission Publication CEC-60-2018-001. Available at: https://www.nrel.gov/docs/fy18osti/70893.pdf. Accessed 7/5/22.

[3] SACOG. 2020 MTP/SCS. Available at: https://www.sacog.org/sites/main/files/file-attachments/2020_mtp-scs.pdf?1580330993. See Figure 3.13: Key Factors Contributing to 19% GHG Reduction. Accessed 7/5/22.