

# Montgomery Planning

## CLIMATE ASSESSMENT FOR ZTA 26-01, COMMERCIAL USES – DATA CENTER

### PURPOSE OF CLIMATE ASSESSMENTS

The purpose of Climate Assessments is to evaluate the anticipated impact of master plans and zoning text amendments (ZTAs) on the county’s contribution to addressing climate change. These assessments are required pursuant to Section 2-81D of the County Code for ZTAs and Section 33A-14 for master plans. They are intended to provide the County Council with a better understanding of the potential climate impacts and implications of proposed master plans and ZTAs, at the county level. Each climate assessment includes: i) the potential positive or negative impact upon climate change; ii) quantitative or qualitative evaluations of identified effects upon greenhouse gas emissions, sequestration and carbon drawdown; and iii) quantitative or qualitative evaluations of identified effects on community resilience and adaptive capacity. Accordingly, the scope of Climate Assessments is limited to addressing climate change, specifically the effect of land use recommendations in master plans and ZTAs on greenhouse gas (GHG) emissions and sequestration, and how actions proposed by master plans and ZTAs could improve the county’s adaptive capacity to climate change and increase community resilience.

While co-benefits such as health and cost savings may be discussed, the focus is on how proposed master plans and ZTAs may impact GHG emissions and community resilience.

### SUMMARY

The Montgomery County Planning Board anticipates that ZTA 26-01 could have indeterminate impacts across many activities related to GHG emissions, a potentially major negative impact on GHG emissions associated with electricity usage, indeterminate impacts on carbon sequestration, and minor positive and minor negative impacts on community resilience and adaptive capacity. Because data centers would be allowed only as conditional uses in industrial zones and would be subject to siting and compatibility standards, the ZTA is not anticipated to result in a substantial number of new data center developments in the County.

This climate assessment is prepared in accordance with the county-adopted climate assessment methodology (*Final Report: Climate Assessment Recommendations for Master Plans and Zoning Text Amendments in Montgomery County, December 1, 2022*, the “Final Report”). The assessment includes an applicability review and directional impact assessment using Tables 1 and 8 of the Final Report (GHG Emissions and Sequestration Checklist, and Community Resilience and Adaptive Capacity Checklist, revised June 2025). This assessment is not a full environmental assessment, rather, it

evaluates whether the ZTA will influence activities that may result in changes in GHG emissions, sequestration, and community resilience and adaptive capacity.

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## BACKGROUND AND PURPOSE OF ZTA 26-01

ZTA 26-01 was introduced on January 20, 2026 by Council President Fani-González, Council Vice-President Balcombe, and Councilmember Sayles. The ZTA proposes amendments to the Montgomery County Zoning Ordinance to establish “Data Center” as a defined commercial use. The ZTA also specifies the zones in which data centers may be permitted as conditional uses, establishes minimum siting and compatibility standards, and generally amends the Zoning Ordinance to regulate permissible locations and conditions for data centers in the County.

ZTA 26-01 includes standards related to setbacks, landscaping and buffering, lighting, noise, generator emissions, and the avoidance or minimization of impacts to environmentally sensitive areas. Based on the standards established in ZTA 26-01, only a limited number of sites are likely to meet the zoning, siting, and compatibility requirements necessary to accommodate data centers.

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## VARIABLES THAT COULD AFFECT THE ASSESSMENT

The following climate-related variables were considered in the assessment. Climate-related variables include the various GHG reduction, sequestration, resilience, and adaptive capacity activities in the climate assessment checklists (see Tables 1 and 2 in this Climate Assessment).

### CLIMATE-RELATED VARIABLES

#### **Greenhouse Gas Emissions and Sequestration**

- Transportation – Vehicle Miles Traveled, Number of Vehicle Trips
- Building Embodied Emissions – Building Certifications, Building Square Footage, Building Life Span, Pavement Infrastructure, Material Waste Produced, Use of Green Building Materials
- Energy – Electricity Usage, Stationary Fuel Usage, Electricity Efficiency, Stationary Fuel Efficiency
- Land Cover Change & Management – Area of Forest, Area of Non-Forest Tree Canopy, Area of Green Cover, Implementation of Nature-Based Solutions

#### **Community Resilience and Adaptive Capacity**

- Exposure-Related Factors – Activity in Flood Risk Areas, Activity in Urban Heat Islands, Exposure to Other Hazards
- Sensitivity-Related Factors – Change to Forest Cover, Change to Non-Forest Tree Canopy, Change to Quality or Quantity of Other Green Areas, Change to Impacts of Heat, Change in Perviousness, Change in Stormwater Management System Treatments, Change to Water Quality and Quantity, Change to Air Quality, Infrastructure Design Decisions

- Adaptive Capacity Factors – Change in Distribution of Resources and Support

## ANTICIPATED IMPACTS

Overall, ZTA 26-01 is anticipated to have indeterminate impacts across many activities related to GHG emissions, a potentially major negative impact on GHG emissions associated with electricity usage, indeterminate impacts on carbon sequestration, and minor positive and minor negative impacts on community resilience and adaptive capacity, as described in more detail in the tables below.

Several activities related to GHG emissions, sequestration, community resilience and adaptive capacity are identified to have indeterminate impacts given several unknown variables such as location, existing conditions, and whether the positive impacts outweigh the negative impacts and vice versa. For example, ZTA 26-01 contains provisions to establish a landscape buffer, which could have a positive impact on non-forest tree canopy or area of forest, but without knowing the existing conditions for a given site, it is unknown whether this positive impact outweighs the negative impact of forest and non-forest tree canopy clearing that may result from constructing data centers.

This assessment distinguishes between impacts that are inherent to data centers as a land use and those that depend on site-specific conditions. For impacts that are well documented in scientific literature as associated with data centers, such as energy use, construction-related embodied emissions, and water quantity, the assessment identifies negative impacts. Where potential impacts depend primarily on location, existing site conditions, or project-specific design considerations, the assessment characterizes impacts as indeterminate.

## GREENHOUSE GAS EMISSIONS, CARBON SEQUESTRATION, AND DRAWDOWN

ZTA 26-01 is anticipated to have indeterminate impacts across many activities related to GHG emissions, a potentially major negative impact on GHG emissions associated with electricity usage, and indeterminate impacts on carbon sequestration. For further explanation of anticipated impacts of ZTA 26-01 on GHG emissions and carbon sequestration by individual activity, see Table 1 below.

**Table 1. Anticipated Impacts on Greenhouse Gas Emissions and Sequestration**

Impact Activity	Type of Impact (No impact, indeterminate, positive, or negative)	Explanation
<b>Transportation Emissions</b>		
<b>Vehicle Miles Traveled</b>	Indeterminate	ZTA 26-01 allows data centers as a conditional use in industrial zones. While industrial areas are generally vehicle-oriented, data centers typically generate a limited number of daily trips due to relatively low on-site staffing. Commuting distances and overall vehicle miles traveled associated with data centers would depend on specific

Impact Activity	Type of Impact (No impact, indeterminate, positive, or negative)	Explanation
		locations and employee travel patterns. Therefore, the net effect of the ZTA on GHG emissions as it relates to VMT is indeterminate.
<b>Number of Vehicle Trips</b>	Indeterminate	A relatively short-term increase in number of vehicle trips is expected during the construction of the data center. However, it is unknown whether the long-term number of vehicle trips associated with employees will be fewer or more than an existing industrial use. Therefore, the net effect of the ZTA on GHG emissions as it relates to number of vehicle trips is indeterminate.
<b>Non-Vehicle Modes of Transportation</b>	No impact	ZTA 26-01 does not modify access to non-vehicle modes of transportation or add non-vehicle transportation options.
<b>Public Transportation Use</b>	No impact	ZTA 26-01 does not modify transit service, transit-oriented development standards, or transit access requirements.
<b>Electric Vehicle Infrastructure Access</b>	No impact	ZTA 26-01 does not require or incentivize electric vehicle charging infrastructure.
<b>Building Embodied Emissions</b>		
<b>Building Certifications</b>	Indeterminate	Use of green building materials can reduce embodied GHG emissions associated with construction. However, ZTA 26-01 does not include requirements or incentives related to building certifications. The ZTA does not get into the actual engineering design of a building, and many energy-related requirements are implemented through building codes. While data centers could voluntarily obtain building certifications such as LEED and ENERGY STAR certifications, the extent to which this would occur cannot be determined at the ZTA level. Therefore, the potential impact of the ZTA on embodied emissions as it relates to building certifications is indeterminate.
<b>Building Square Footage</b>	Negative	Data centers are typically large-scale buildings. Construction of large-scale data center facilities entails embodied GHG emissions associated with building materials, construction activities, and additional energy use in buildings. While the ZTA does not specify building size or materials, the embodied emissions impact associated with data center construction is anticipated to be a negative impact.
<b>Building Life Span</b>	Indeterminate	ZTA 26-01 does not include standards for building reuse, demolition, or longevity. New development would result in more embodied emissions than adaptive reuse. However, given that it is unknown what development type would

Impact Activity	Type of Impact (No impact, indeterminate, positive, or negative)	Explanation
		occur, or the longevity of the building once constructed, the impact is indeterminate.
<b>Pavement Infrastructure</b>	Indeterminate	Data centers typically require substantial pavement infrastructure, including access drives, service roads, loading areas, parking areas. ZTA 26-01 would allow data centers as a conditional use in industrial zones, which may already contain a high impervious surface coverage. As a result, the introduction of data center uses in these zones may not represent a substantial increase in imperviousness relative to existing conditions. However, additional paved areas associated with large building footprints are still feasible. Because ZTA 26-01 does not identify specific sites or establish impervious surface limits, the net change in pavement coverage and associated climate impacts is indeterminate.
<b>Material Waste Produced</b>	Negative	Material waste produced is anticipated to increase due to material waste generated during construction activities and/or demolition of existing industrial use on a given property. Although the quantity of waste cannot be determined at the ZTA level, the generation of construction waste is characteristic of new development, and the resulting impact is therefore considered negative effect.
<b>Use of Green Building Materials</b>	Indeterminate	Use of green building materials can reduce embodied GHG emissions associated with construction. However, ZTA 26-01 does not include requirements or incentives related to use of green building materials. While data centers could incorporate green building materials voluntarily, the extent to which such materials would be used cannot be determined at the ZTA level.
<b>Energy Emissions</b>		
<b>Electricity Usage</b>	Negative	Data centers are energy-intensive users with continuous electricity demand. This specific use is associated with higher electricity consumption than other commercial or industrial uses <sup>1</sup> . The ZTA does not include provisions for renewable energy requirements, and while the additional electricity demand is met by fossil fuel-based generation, increased GHG gas emissions would result. Therefore, the potential impact of electricity usage on GHG emissions is anticipated to be a major negative effect.
<b>Stationary Fuel Usage</b>	Negative	Data centers commonly rely on stationary fuel systems for backup power to ensure continuous operations. Although ZTA 26-01 requires generators to meet Tier 4 or equivalent emission standards, these generators are still considered a

<sup>1</sup> Energy.gov. “Data Centers and Servers,” n.d. <https://www.energy.gov/eere/buildings/data-centers-and-servers>.

Impact Activity	Type of Impact (No impact, indeterminate, positive, or negative)	Explanation
		source of emissions when they operate during testing or outages. Therefore, the potential impact of stationary fuel usage on GHG emissions is anticipated to be a minor negative effect.
<b>Electricity Efficiency</b>	Negative	Data centers are energy-intensive and operate continuously, resulting in high electricity consumption regardless of efficiency measures. Although electricity efficiency measures can be implemented, the overall electricity efficiency of data centers, when evaluated relative to other commercial or industrial uses, may be lower due to their constant operational load and energy demands. Therefore, the potential impact of electricity efficiency on GHG emissions is anticipated to be a major negative effect.
<b>Stationary Fuel Efficiency</b>	Negative	Data centers commonly rely on stationary fuel systems for backup power to ensure continuous operations. Although ZTA 26-01 requires generators to meet Tier 4 or equivalent emission standards, these standards do not directly address fuel efficiency. Therefore, the impact of stationary fuel efficiency on GHG emissions is considered a minor negative effect.
<b>Land Cover Change &amp; Management Sequestration</b>		
<b>Area of Forest</b>	Indeterminate	Although industrial zones may already be partially or fully developed and may contain limited forested areas, development of large-scale data centers could result in localized forest clearing on properties that have existing forested areas. The net effect on forest areas is considered indeterminate, with the potential for minor negative impacts.
<b>Area of Non-Forest Tree Canopy</b>	Indeterminate	ZTA 26-01 includes landscaping and buffer standards that may support the incorporation of trees and vegetated buffers onsite. Given that industrial zones may already be partially or fully developed and may contain limited areas of tree canopy cover, data center development in such areas can potentially result in localized increases in non-forest tree canopy. However, because existing site conditions and specific locations are unknown, the net effect on non-forest tree canopy is considered indeterminate, with the potential for minor positive effects.
<b>Area of Green Cover</b>	Indeterminate	ZTA 26-01 includes landscaping and buffer standards that may support the incorporation of green cover onsite. Data center development may reduce existing green cover on some sites or introduce landscaped areas on others, particularly in previously developed industrial areas. However, because existing site conditions and specific locations are unknown, the net effect on green cover is

Impact Activity	Type of Impact (No impact, indeterminate, positive, or negative)	Explanation
		considered indeterminate, with the potential for minor positive effects.
<b>Implementation of Nature-Based Solutions</b>	Indeterminate	ZTA 26-01 includes landscaping, buffer, and environmental protection standards that may support incorporation of some nature-based solutions at the site level, particularly in industrial zones where existing nature-based solutions may be limited. Because the extent to which nature-based solutions would be implemented depends on site-specific conditions and project level design decisions, the overall impact is considered indeterminate, with the potential for minor positive effects.

COMMUNITY RESILIENCE AND ADAPTIVE CAPACITY

ZTA 26-01 is anticipated to have minor positive and minor negative impacts on community resilience and adaptive capacity. For further explanation of anticipated impacts of ZTA 26-01 on community resilience and adaptive capacity by individual activity, see Table 2 below.

**Table 2. Anticipated Impacts on Community Resilience and Adaptive Capacity**

Impact Activity	Type of Impact (No impact, indeterminate, positive, or negative)	Explanation
<b>Exposure-Related Factors</b>		
<b>Activity in Flood Risk Areas</b>	No impact	ZTA 26-01 includes a requirement to avoid and minimize impacts to floodplains to the maximum extent practicable and does not modify existing floodplain regulations nor expand development rights within flood risk areas. As a result, the ZTA is not anticipated to change the number of people or amount of infrastructure located in flood risk areas, and no impacts on flood risk exposure is anticipated.
<b>Activity in Urban Heat Islands</b>	Negative	Industrial zones may already experience elevated surface temperatures due to existing impervious surfaces and limited vegetation. Data center development could increase localized heat island effects because of additional building mass, paved areas, and heat-generating equipment. Therefore, the impact on activity in urban heat islands is characterized as a negative effect.
<b>Exposure to Other Hazards</b>	No impact	The ZTA does not change the amount of people or infrastructure exposed to other climate hazards like severe storms, wind, and drought.

Impact Activity	Type of Impact (No impact, indeterminate, positive, or negative)	Explanation
<b>Sensitivity-Related Factors</b>		
<b>Change to Forest Cover</b>	Indeterminate	Although industrial zones may already be partially or fully developed and may contain limited forested areas, development of large-scale data centers could result in localized forest clearing on properties that have existing forested areas. The net effect on forest areas is considered indeterminate, with the potential for negative impacts.
<b>Change to Non-Forest Tree Canopy</b>	Indeterminate	ZTA 26-01 includes landscaping and buffer standards that may support the incorporation of trees and vegetated buffers onsite. Given that industrial zones may already be partially or fully developed and may contain limited areas of tree canopy cover, data center development in such areas can potentially result in localized increases in non-forest tree canopy. However, because existing site conditions and specific locations are unknown, the net effect on non-forest tree canopy is considered indeterminate.
<b>Change to Quality or Quantity of Other Green Areas</b>	Indeterminate	ZTA 26-01 includes landscaping and buffer standards that may support the incorporation of green cover onsite. Data center development may reduce existing green cover on some sites or introduce landscaped areas on others, particularly in previously developed industrial areas. However, because existing site conditions and specific locations are unknown, the net effect on green cover is considered indeterminate.
<b>Change to Impacts of Heat</b>	Negative	In addition to contributing to localized urban heat island effects, data center development may influence heat exposure through increased building mass and heat-generating equipment. Therefore, the impact on heat exposure is characterized as a negative effect.
<b>Change in Perviousness</b>	Indeterminate	Data centers typically require substantial pavement infrastructure, including access drives, service roads, loading areas, parking areas. ZTA 26-01 would allow data centers as a conditional use in industrial zones, which may already contain a high impervious surface coverage. As a result, the introduction of data center uses in these zones may not represent a substantial increase in imperviousness relative to existing conditions. However, additional paved areas associated with large building footprints are still feasible. Because ZTA 26-01 does not identify specific sites or establish impervious surface limits, the net change in pavement coverage and associated climate impacts is indeterminate.
<b>Change in Stormwater Management System Treatments</b>	Indeterminate	Data center development would be subject to current County stormwater management requirements which may result in updated stormwater management systems where redevelopment occurs in industrial zones, potentially

Impact Activity	Type of Impact (No impact, indeterminate, positive, or negative)	Explanation
		improving site-level stormwater treatment. Because ZTA 26-01 does not identify specific sites or stormwater design requirements, the net change in stormwater management system treatments is indeterminate, with the potential for minor positive effects.
<b>Change to Water Quality and Quantity</b>	Negative	Data centers can be water-intensive facilities using significant volumes of water for cooling <sup>2</sup> . However, selection of cooling technology, water sourcing, and withdrawal volumes are determined at the project level rather than zoning. Since data centers typically use cooling technology that utilizes large amounts of water, the impact to water quantity is considered a major negative impact. Water quality and water quantity impacts are influenced by changes in impervious surface coverage, stormwater management practices, and water use associated with development. Data centers contain large impervious surfaces. Development of data centers could increase runoff volumes or pollutant loading at the site level if additional impervious surfaces are introduced, resulting in potential minor negative effects on water quality or quantity. On the other hand, Industrial zoned property is likely to contain large amounts of existing impervious surfaces. Redevelopment of previously developed sites may require installation of updated stormwater management systems that improve conveyance and treatment of stormwater relative to existing conditions.
<b>Change to Air Quality</b>	Indeterminate	ZTA 26-01 requires backup generators to meet Tier 4 or equivalent emissions standards. While stationary fuel combustion contributes to GHG emissions, Tier 4 standards significantly reduce emissions of nitrogen oxides and particulate matter compared to older generator technologies <sup>3</sup> . In industrial areas with existing stationary fuel usage, this requirement may result in localized improvements in air quality relative to existing conditions. However, because impacts would vary based on location, the impact on air pollution exposure is considered indeterminate.
<b>Infrastructure Design Decisions</b>	Indeterminate	ZTA 26-01 does not establish requirements for infrastructure design choices that affect climate resilience. Because such decisions are made at the project-level and vary by site and design, the impact on infrastructure design decisions is considered indeterminate.

<sup>2</sup> Environmental and Energy Study Institute (EESI). “Data Centers and Water Consumption.” June 25, 2025. <https://www.eesi.org/articles/view/data-centers-and-water-consumption>.

<sup>3</sup> 40 CFR Part 1039 (2004), <https://www.ecfr.gov/current/title-40/part-1039>

Impact Activity	Type of Impact (No impact, indeterminate, positive, or negative)	Explanation
<b>Adaptive Capacity Factors</b>		
<b>Change to Accessibility or Prevalence of Community and Public Spaces</b>	No impact	ZTA 26-01 does not affect the availability or accessibility of community and public spaces and includes standards requiring avoidance and minimization of impacts to parks. Therefore, no impacts are anticipated.
<b>Change to Emergency Response and Recovery Capabilities</b>	No impact	ZTA 26-01 does not modify emergency response systems, public safety infrastructure, or recovery capabilities.
<b>Change in Access to Transportation</b>	No impact	ZTA 26-01 does not modify transportation infrastructure or transit services. Therefore, it is not expected to result in changes in access to transportation.
<b>Change to Accessibility or Prevalence of Local Food Sources and Other Goods</b>	No impact	ZTA 26-01 does not affect agricultural land, food retail, or goods distribution systems. Therefore, it is not expected to result in changes to accessibility or prevalence of local food sources and other goods.
<b>Change in Availability or Distribution of Economic and Financial Resources</b>	No impact	While individual data center projects may generate construction employment and a limited number of permanent jobs, ZTA 26-01 does not alter how economic or financial resources are distributed or accessed at the community level. Therefore, no impact on economic resilience is anticipated.
<b>Change to Community Connectivity</b>	No impact	ZTA 26-01 establishes data centers as a conditional use in existing industrial zones but does not alter land use designations, transportation networks, or pedestrian or bicycle connections. Therefore, it is not expected to result in changes to community connectivity.
<b>Change in Distribution of Resources and Support</b>	Indeterminate	ZTA 26-01 requires applicants to demonstrate that data center siting will not disproportionately negatively affect overburdened or underserved communities, which may support more equitable outcomes. However, the effectiveness of this requirement will depend on site-specific review outcomes. Because this provision affects siting decisions rather than the allocation of public resources or services, and that specific locations and mitigation measures are unknown, the net change in distribution of resources and support is indeterminate, with the potential for minor positive effects.

## RELATIONSHIP TO GREENHOUSE GAS REDUCTION AND SEQUESTRATION ACTIONS CONTAINED IN THE MONTGOMERY COUNTY CLIMATE ACTION PLAN (CAP)

The Montgomery County Climate Action Plan (CAP) details the effects of a changing climate on Montgomery County and includes interagency strategies to reduce GHG gas emissions and climate-related risks to the county’s residents, businesses, and the built and natural environment.

The CAP includes 86 climate actions as a pathway to meet the county’s ambitious climate goals while building a healthy, equitable, and resilient community. Each county department has responsibilities for specific climate actions that are relevant to the work of that department. The following table provides a list of CAP actions identified as relevant based on the activities potentially influenced by ZTA 26-01 but does not indicate that ZTA 26-01 advances or implements these actions. This section includes relevant CAP GHG reduction actions and their GHG reduction potentials as evaluated within the CAP.

Climate Action Plan (CAP) action	CAP-assessed GHG reduction potential	Relevant master plan checklist GHG activities
E-2: Private Building Solar Photovoltaic Code Requirements	Medium	Electricity usage
E-3: Promote Private Solar Photovoltaic Systems	Medium	Electricity usage
B-5: All-Electric Building Code for New Construction	High	Electricity usage, Stationary fuel usage, Efficiency
B-6: Disincentivize and/or Eliminate Natural Gas in New Construction	High	Electricity usage, Stationary fuel usage, Efficiency
B-7: Net Zero Energy Building Code for New Construction	High	Building certifications, Electricity usage, Stationary fuel usage
T-1: Expand Public Transit	Medium	Vehicle miles traveled, number of trips, Public transportation use
T-2: Expand Active Transportation and Micromobility Network	Medium	Vehicle miles traveled, number of trips, Non-vehicle modes of transportation
T-3: Private Vehicle Electrification	Medium	Electric vehicle infrastructure access, Electricity usage
S-1: Retain and Increase Forests	Not assessed (NA)	Area of forest
S-2: Retain and Increase Tree Canopy	NA	Area of non-forest tree canopy
S-3: Restore and Enhance Meadows and Wetlands	NA	Area of green cover, Nature-based solutions

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## RECOMMENDED AMENDMENTS

The Climate Assessment Act requires the Planning Board to offer appropriate recommendations such as amendments to the proposed ZTA 26-01, or other mitigating measures that could help counter any identified negative impacts through this Climate Assessment. The following are mitigating measures that could be explored further as the legislation is finalized to help strengthen alignment of ZTA 26-01 with the County’s climate mitigation, resilience, and equity goals:

- Require standards addressing energy usage, including a finding that Data Center development will not impair the County and State climate goals, utilizing the Carbon Usage Effectiveness ratio as a benchmark, and offsetting data center operational electricity demand, through on-site renewable energy generation, storage, or procurement that result in new renewable energy capacity.
- Require standards for addressing heat mitigation strategies such as cool roofs, light-colored pavements, shaded parking areas, and enhanced tree canopy to the extent feasible to reduce heat island effects associated with large building footprints and impervious surfaces.
- Require standards that limit the use of potable water for cooling and reduce potential impacts to water quality and quantity.

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## SOURCES OF INFORMATION, ASSUMPTIONS, AND METHODOLOGIES USED

The climate assessment for ZTA 26-01 was prepared using the methodology for ZTAs contained within the *Climate Assessment Recommendations for Master Plans and Zoning Text Amendments in Montgomery County, December 1, 2022*. The assessment is not a full environmental review and does not quantify project-specific impacts. Instead, it evaluates whether ZTA 26-01 may influence activities that are known to affect GHG emissions, carbon sequestration, and community resilience and adaptive capacity.

Key sources include the county-adopted climate assessment methodology, Montgomery County Climate Action Plan, publications from U.S. Department of Energy, Environmental and Energy Study Institute, and U.S. Environmental Protection Agency regulations. Specific sources are cited in footnotes throughout this assessment.