

# Montgomery Planning

## CLIMATE ASSESSMENT FOR ZTA 26-02, OVERLAY ZONES – REGIONAL SHOPPING CENTER (RSC)

### 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 26-02 could have potential minor mixed impact on GHG emissions, no impact on carbon sequestration, and minor, indirect positive impact on community resilience and adaptive capacity. The mixed climate impact is characterized by potential minor increases in building-related emissions associated with increased residential gross floor area, partially offset by potential transportation-related benefits from locating additional residents in areas with transit access and planned transportation infrastructure.

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 (Greenhouse Gas 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.

---

## BACKGROUND AND PURPOSE OF ZTA 26-02

ZTA 26-02 was introduced on January 27, 2026 by Councilmember Friedson and Council President Fani-González. The ZTA proposes amendments to the Montgomery County Zoning Ordinance to allow residential development within the Regional Shopping Center (RSC) Overlay Zone to exceed the standard 30 percent cap on household living uses, provided that a regional shopping center of at least 600,000 square feet is retained on site. The ZTA also includes a minor technical amendment to development standards in the RSC Overlay Zone.

---

## VARIABLES THAT COULD AFFECT THE ASSESSMENT

Climate-related variables considered in this assessment include the various GHG reduction, sequestration, resilience, and adaptive capacity activities in the climate assessment checklists (see Tables 1 and 8 of the Final Report). The following climate-related variables were identified as activities that may be directly or indirectly influenced by ZTA 26-02.

### CLIMATE-RELATED VARIABLES

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

- Transportation – Vehicle Miles Traveled, Number of Vehicle Trips, Non-vehicle modes of transportation, Public transportation use
- Building Embodied Emissions – Building Square Footage, Material Waste Produced

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

- Adaptive Capacity Factors – Change in Access to Transportation

---

## ANTICIPATED IMPACTS

Overall, ZTA 26-02 is anticipated to have potential minor mixed impact on GHG emissions, no impact on carbon sequestration, and minor, indirect positive impact on community resilience and adaptive capacity, as described in more detail in the sections below.

### GREENHOUSE GAS EMISSIONS, CARBON SEQUESTRATION, AND DRAWDOWN

ZTA 26-02 is anticipated to have potential minor mixed impact on GHG emissions and no impact on carbon sequestration. The mixed climate impact is characterized by potential minor increases in building embodied emissions associated with increased residential gross floor area, partially offset by potential lower per-capita transportation emissions from locating additional residents in areas with transit access and planned transportation infrastructure.

ZTA 26-02 removes the standard cap on household living uses within the RSC Overlay Zone, which may enable an increase in residential GFA compared to what would otherwise occur under existing

zoning. An increase in building square footage is generally associated with minor increases in GHG emissions, including both embodied emissions from construction materials and waste, and operational emissions over the life of the building.

On the other hand, the two existing RSC Overlay Zones in the County are areas with existing transit options, planned bicycle and pedestrian infrastructure, and proximity to services. By allowing additional residents to live in these locations, the ZTA may result in minor transportation-related benefits, since residents may have more opportunities to walk, bike, or use transit instead of driving. Compared to development in auto-oriented areas, housing in these locations may result in potentially lower per-capita transportation emissions.

The ZTA does not affect forest conservation, tree canopy, or green cover requirements and therefore has no impact on carbon sequestration.

### COMMUNITY RESILIENCE AND ADAPTIVE CAPACITY

ZTA 26-02 is anticipated to have indirect minor positive impact on community resilience and adaptive capacity. As mentioned above, the two existing RSC Overlay Zones in the County are areas with existing transit options, planned bicycle and pedestrian infrastructure, and proximity to services. By allowing additional residents to live in these locations, the ZTA may provide minor, indirect benefits to adaptive capacity by improving access to transportation options and essential services during extreme weather events or other climate-related disruptions.

### 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 relevant CAP actions based on the activities potentially influenced by ZTA 26-03 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
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-4: Constrain Cars in Urban Areas, Limit Major New Road Construction	Medium	Vehicle miles traveled, number of trips

Note: GHG reduction potentials were assessed in the June 2021 County Climate Action Plan. Within this plan the following definitions for reductions are used: High: >1,000,000 MT CO<sub>2</sub>e, Medium: 500,000-1,000,000 MT CO<sub>2</sub>e, and Low: <500,000 MT CO<sub>2</sub>e. Actions that had no associated GHG reduction potential are not included in the table above. Carbon sequestration potentials were not assessed for the actions outlined in the County Climate Action Plan. Note that the Climate Action Plan does not include actions that explicitly address reducing embodied GHG emissions for buildings. <https://www.montgomerycountymd.gov/climate/Resources/Files/climate/climate-action-plan.pdf>

## RECOMMENDED AMENDMENTS

The Climate Assessment Act requires the Planning Board to offer appropriate recommendations such as amendments to the proposed ZTA 26-02, or other mitigating measures that could help counter any identified negative impacts through this Climate Assessment. Planning Staff do not recommend any specific amendments or mitigating strategies as a result of the Climate Assessment. Generally, there will be minor GHG impacts associated with the potential increase in residential development. Planning Staff recommends exploring code changes or incentives that encourage lower-carbon building materials and construction waste reduction practices for any development activity.

## SOURCES OF INFORMATION, ASSUMPTIONS, AND METHODOLOGIES USED

The climate assessment for ZTA 26-02 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 26-02 may influence activities that are known to affect GHG emissions, carbon sequestration, and community resilience and adaptive capacity.