

CLIMATE ASSESSMENT FOR ZTA 26-03, BIOHEALTH PRIORITY CAMPUS - ELIGIBILITY

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 26-03 could have potential minor mixed impact on GHG emissions and indeterminate impact on carbon sequestration. The mixed climate impact is characterized by potential minor increases in building-related emissions associated with increased development activity in the biohealth sector. However, this is offset by minor positive impacts that result from incentivizing adaptive reuse, supporting smaller development footprint, and supporting development in transit-accessible locations. From a community resilience and adaptive capacity perspective, ZTA 26-03 is anticipated to have minor positive impacts by supporting economic resilience and access to jobs in transit-accessible locations.

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 26-03

ZTA 26-03 was introduced on January 27, 2026 by Councilmember Friedson, co-sponsored by Council President Fani-González and Councilmembers Luedtke, Balcombe, Evans, and Stewart. The ZTA proposes amendments to the definition and eligibility thresholds for a Biohealth Priority Campus by lowering minimum square footage requirements for new construction and additions, and by allowing repurposing of existing Office and Professional use buildings to qualify. The ZTA also updates a transportation reference to align with current transportation master plans.

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 26-03.

CLIMATE-RELATED VARIABLES

Greenhouse Gas Emissions and Sequestration

- Transportation – Non-vehicle modes of transportation, Public transportation use
- Building Embodied Emissions – Building Square Footage, Building Lifespan, Material Waste Produced

Community Resilience and Adaptive Capacity

- Adaptive Capacity Factors – Change in Access to Transportation, Change in Availability or Distribution of Economic and Financial Resources

ANTICIPATED IMPACTS

Overall, ZTA 26-03 is anticipated to have potential minor mixed impact on GHG emissions, indeterminate impact on carbon sequestration, and minor 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 26-03 is anticipated to have potential minor negative impact on overall GHG emissions, offset by minor positive impacts related to transportation and embodied emissions, and indeterminate impact on carbon sequestration.

Transportation

From a transportation perspective, ZTA 26-03 is anticipated to have minor positive impacts. Currently, Biohealth Priority Campus sites must be located in red policy areas, opportunity zones, or within one-half mile of planned or existing Bus Rapid Transit routes. These areas already have relatively good access to transit and other transportation infrastructure. Even without the ZTA, biohealth-related development would likely continue to occur in these locations. Although the ZTA does not necessarily change development locations, non-vehicle transportation access, or public transportation availability, it supports continued development in areas where travel options are more varied and reliance on driving may be generally lower than in more auto-oriented parts of the County. This results in minor positive impacts on GHG emissions associated with non-vehicle modes of transportation and public transportation use. Additionally, while the ZTA may allow additional employment-generating development and associated trips, its effects on vehicle miles traveled and number of trips are considered indeterminate and will depend on specific locations and employee travel patterns.

Building Embodied Emissions

The ZTA is anticipated to have minor positive impacts to embodied emissions associated with building square footage and building lifespan. By lowering square footage thresholds and allowing repurposing of existing Office and Professional buildings, the ZTA may encourage smaller building footprints and adaptive reuse. These changes could reduce the amount of new construction materials and waste per project and extend the useful life of existing buildings, decreasing embodied emissions associated with demolition and new construction as a result.

While additional development enabled by the ZTA may still generate construction-related emissions, the flexibility to reuse existing structures and construct smaller additions partially offset these impacts. Without the ZTA, biohealth-related development could still occur but may be more likely to involve larger new buildings or less adaptive reuse, which could result in similar or higher embodied emissions per-project.

Energy

While biohealth and life sciences uses can be energy-intensive, this ZTA does not regulate building design or operations, and will therefore have indeterminate with potential negative impacts related to energy related emissions.

Land Cover Change & Management

While the ZTA may facilitate adaptive reuse of existing buildings, which could reduce land disturbance on some sites, it may also enable a greater number of projects over time. Because the location, design, and impacts of future development on land cover including forest, tree cover, and green cover would be determined through regulatory review, the effect of the ZTA on land cover and associated carbon sequestration is considered indeterminate.

COMMUNITY RESILIENCE AND ADAPTIVE CAPACITY

ZTA 26-03 is anticipated to have minor positive impact on community resilience and adaptive capacity. The ZTA supports economic resilience by encouraging growth in the biohealth and life sciences sector. Allowing more projects to qualify for expedited review may help strengthen this sector and support job creation in established activity centers.

In addition, facilitating continued development in transit-accessible areas supports resilience by maintaining access to employment for a broader range of workers and reducing reliance on single-occupancy vehicles. Transportation-related resilience benefits are anticipated to be minor positive.

The ZTA does not modify standards related to land cover. As such, impacts on environmental resilience factors, such as flood resilience and urban heat mitigation, are considered indeterminate.

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
E-2: Private Building Solar Photovoltaic Code Requirements	Medium	Electricity usage
E-3: Promote Private Solar Photovoltaic Systems	Medium	Electricity usage
B-1: Electrification Requirements for Existing Commercial and Public Buildings	High	Electricity usage, Stationary fuel usage, Efficiency
B-3: Energy Performance Standard for Existing Commercial and Multifamily Buildings	High	Electricity usage, Stationary fuel usage, Efficiency
B-4: Electrification Incentives for Existing Buildings	High	Electricity usage, Stationary fuel usage, Efficiency
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 CO₂e, Medium: 500,000-1,000,000 MT CO₂e, and Low: <500,000 MT CO₂e. 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 26-03, or other mitigating measures that could help counter any identified negative impacts through this Climate Assessment. Planning Staff have no recommended amendments or mitigating measures as a result of this ZTA. Any commercial development activity is likely to have an impact on building embodied emissions and energy use. Standards, strategies or incentives could be explored that encourage lower-carbon building materials, construction waste reduction practices, and reducing operational energy demand and associated emissions.

SOURCES OF INFORMATION, ASSUMPTIONS, AND METHODOLOGIES USED

The climate assessment for ZTA 26-03 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 26-03 may influence activities that are known to affect GHG emissions, carbon sequestration, and community resilience and adaptive capacity.