Montgomery Planning

CLIMATE ASSESSMENT FOR ZTA 26-05, EXPEDITED APPROVAL PLAN – JOB CREATION PROJECT

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 26-05 will have a combination of positive and negative impacts on the county's goals of addressing greenhouse gas emissions, carbon sequestration, and ensuring resilience and adaptive capacity of communities. The ZTA expands the Job Creation Project use beyond primarily transit-oriented Commercial/Residential (CR) zones into additional CR, employment, and industrial zones, and lowers the eligibility threshold for expedited approval projects. As a result, future redevelopment projects resulting from the ZTA may occur in locations with varying levels of transit accessibility and environmental conditions.

BACKGROUND AND PURPOSE OF ZTA 26-05

ZTA 26-05 was introduced on March 10, 2026, by Council President Fani-González. The ZTA proposes to replace the existing "Signature Business Headquarters" use with a new use called "Job Creation Project" and expands the eligibility requirements for that use. The ZTA expands the use into additional Commercial/Residential (CRT), Employment (LSC, EOF), and Industrial (IL, IM) zones, lowers the minimum employee threshold from 20,000 employees to 200 employees onsite within two

years of obtaining a use-and-occupancy permit, removes the requirement that the use serve as a headquarters or primary place of business, and requires that qualifying businesses either be identified as a strategic industry sector in the current Economic Development Strategic Plan and receive County or State funding or incentives, or meet the employee threshold.

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 (updates of Tables 1 and 8 contained in the *Climate Assessment Recommendations for Master Plans and Zoning Text Amendments in Montgomery County,* the "Climate Assessment Checklists"). The following climate-related variables were identified as activities that may be directly or indirectly influenced by ZTA 26-05.

CLIMATE-RELATED VARIABLES

Greenhouse Gas Emissions and Sequestration

- Transportation – Vehicle miles traveled by type, number of trips, non-vehicle modes of transportation, public transportation use
- Building Embodied Emissions – Building square footage, building lifespan, pavement infrastructure, material waste produced
- Energy – Electricity usage, stationary fuel usage, electricity efficiency
- Land Cover Change & Management – Area of forest, 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 island
- 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 to water quality or quantity, change to air quality, infrastructure design
- Adaptive Capacity Factors – Change in access to transportation, change in availability or distribution of economic and financial resources

ANTICIPATED IMPACTS

ZTA 26-05 is anticipated to have a combination of potential positive and negative impacts on greenhouse gas emissions, sequestration, community resilience, and adaptive capacity depending on the number, type, and location of Job Creation Project uses resulting from the ZTA.

GREENHOUSE GAS EMISSIONS, CARBON SEQUESTRATION, AND DRAWDOWN

ZTA 26-05 is anticipated to have a potential mixed impact on greenhouse gas emissions and carbon sequestration. Because the ZTA does not directly approve site-specific development projects, the extent and magnitude of potential positive and negative impacts will depend on future project locations, existing site conditions, and transportation access.

Transportation

From a transportation perspective, ZTA 26-05 is anticipated to have potential negative impacts. The existing Signature Business Headquarters use is primarily limited to transit-oriented CR zones. Depending on existing conditions and locations of future Job Creation Projects, expanding eligibility into additional employment and industrial zones may allow future projects to occur in areas with lower transit accessibility or fewer multimodal transportation options. This may result in potential negative impacts associated with vehicle miles traveled, number of trips, non-vehicle modes of transportation, and public transportation use. At the same time, some of the CRT, EOF, and LSC zones are located within activity centers or transit-accessible areas. The extent and magnitude of transportation-related impacts will depend on future project locations, transit access, and employee travel behavior.

Building Embodied Emissions

The ZTA is anticipated to have a mix of potential positive and negative impacts related to embodied emissions. Expanding eligibility into additional zoning categories and lowering the employee threshold may increase redevelopment activity. This could increase construction-related emissions, material use, and waste generation in some locations. However, future Job Creation Projects may also modernize or reuse older commercial and industrial properties with updated buildings. The potential impacts associated with building square footage, building lifespan, pavement infrastructure, and material waste generation will depend on future redevelopment proposals and site-specific implementation.

Energy

The ZTA is anticipated to have a mix of potential positive and negative impacts related to energy usage and efficiency. Future redevelopment projects may increase electricity demand depending on building type and operations. At the same time, redevelopment may also replace older buildings with newer and more energy-efficient systems that comply with current energy and building codes.

Land Cover Change & Management

The ZTA is anticipated to have potential negative impacts related to land cover change and carbon sequestration. Depending on future project locations and site conditions, expansion into additional zoning districts may increase redevelopment pressure on sites containing forest, tree canopy, or

green cover resources. Future redevelopment may also affect perviousness and urban heat island conditions, depending on future site design.

COMMUNITY RESILIENCE AND ADAPTIVE CAPACITY

ZTA 26-05 is anticipated to have a mix of potential positive and negative impacts on community resilience and adaptive capacity. The ZTA may support economic resilience and adaptive capacity by expanding eligibility for Job Creation Projects. However, expansion into additional zones may also increase redevelopment activity in areas with existing urban heat island conditions, limited tree canopy, flood risk constraints, or varying levels of transit accessibility depending on future project location and design.

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 section provides a list of the CAP action items relevant to Montgomery Planning and pertains to ZTA 26-05. While it is not possible to know the rate of implementation, development funding, or other implications, each CAP action was assessed to determine whether it will have no, indeterminate, minor, moderate, major, a combination, or a range of positive or negative impacts on implementing the action.

Because the ZTA establishes a zoning and regulatory framework rather than approving site-specific development projects, many relationships to CAP actions involve a combination of potential positive and negative impacts depending on future project locations, transportation access, existing conditions, and site design, as discussed in the Anticipated Impacts section above.

ZTA 26-05 may have a combination of potential positive and negative impacts on implementation of the following CAP actions:

- T-1: Expand Public Transit
- T-2: Expand Active Transportation and Micromobility Network;
- T-4: Constrain Cars in Urban Areas, Limit Major New Road Construction
- T-8: Transportation Demand Management and Telework Strategies
- B-7: Net Zero Energy Building Code for New Construction
- S-1: Retain and Increase Forests
- S-2: Retain and Increase Tree Canopy

- S-3: Restore and Enhance Meadows and Wetlands
- A-2: Repair and Enhancement of Stormwater Conveyance Systems
- A-7: Green Public Spaces
- A-10: Green Infrastructure

RECOMMENDED AMENDMENTS

The Climate Assessment Act requires the Planning Board to offer appropriate recommendations such as amendments to the proposed ZTA 26-05, or other mitigating measures that could help counter any identified negative impacts through this Climate Assessment. Depending on the number, type, size, and location of new Job Creation Projects, ZTA 26-05 will likely result in a range of mostly minor positive and negative impacts on the County's goals regarding greenhouse gas emissions, sequestration, community resilience, and adaptive capacity. Staff recommends consideration of additional locational criteria for Job Creation Projects to further support County climate and transportation goals. Similar to other uses that may be approved under an expedited approval plan (e.g. Biohealth Priority Campus and Mixed-Income Housing Community), prioritizing eligibility to sites in transit-accessible areas, such as red policy areas, or within one-half mile of existing or planned Bus Rapid Transit corridors could be considered.

SOURCES OF INFORMATION, ASSUMPTIONS, AND METHODOLOGIES USED

The climate assessment for ZTA 26-05 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 26-05 may influence activities that are known to affect GHG emissions, carbon sequestration, community resilience, and adaptive capacity.