



December 6th 2022,

**Written comments for 12/8/22 Planning Board hearing on - Item 8-
Climate Assessment¹ tools for master plans and ZTAs per Bill 3-22^[1]**

Submitted by:

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Dear Montgomery County Planning Board,

For 125 years, Nature Forward (formerly Audubon Naturalist Society) has inspired people to enjoy, learn about and protect nature. Our priorities include fighting the climate crisis, protecting biodiversity & habitats, increasing human health & access to nature, and promoting sustainable land use. By enacting Bill 3-22 to require the preparation of climate assessments for master plans and zoning text amendments (ZTAs), the Council has facilitated more informed decision-making on climate impacts. We commend this proactive Council action. We thank the Planning Board for the opportunity to provide testimony on Item #8 at the December 8th Planning Board Meeting on Climate Assessment tools for master plans and ZTAs per Bill 3-22. We provide the following comments as part of our testimony.

We support the following:

- The bold approach taken by the Planning Staff to tackle climate change by performing climate assessments on future ZTAs and Master Plans before the County Council. This proactive approach will highlight Montgomery County as one of the first and still few counties in the US to lead this effort.

¹ Item 8 - Climate Assessment tools for master plans and ZTAs per Bill 3-22. Available at: <https://montgomeryplanningboard.org/agenda-item/december-08-2022/>



- The Planning Staff's recommended approval of the ICF's proposed template for conducting climate assessments for master plans and ZTAs.²
- The inclusion of the transportation, building emissions, energy emissions, and land cover & management sectors as part of the GHG checklist and review of the County's Climate Action Plan (CAP) priorities.
- The commitment to work on a full GHG emission and sequestration report on Master Plans vs ZTAs, given they have a longer review period of approximately 18 months.
- The connection to the Climate Action Plan (CAP) by including a review of the CAP's recommended actions in the ZTA and Master Plan's climate assessments process.
- In the "community resilience and adaptive capacity" checklist we support the addition of the core components of vulnerability, exposure, sensitivity, and adaptive capacity to enhance the overall climate assessment review for ZTAs and Master Plans.

We recommend updating the following:

- **Some ZTAs will need a more comprehensive GHG accounting than the report recommends.** The final ICF report as written states that climate assessments for ZTAs need not include an extensive GHG emissions report like that required for the Master Plans. Instead, GHG emissions and sequestration estimates for ZTAs will be more qualitative and be conducted in a three-step approach which will be 1) complete GHG and sequestration checklist; 2) Determine relationship to County climate priorities; and 3) Prepare assessment narrative. Currently only Master Plans have a four-step approach of GHG assessment which include 1) conduct data availability assessment; 2) Conduct qualitative GHG assessment; 3) Quantify GHG emissions and sequestration; 4) Prepare the narrative assessment.

While we appreciate that many ZTAs are relatively simple and unlikely to have significant impact on GHG emissions, others are the opposite. For example, a climate assessment for pending ZTA 20-07 (which would allow more duplexes, townhouses, and apartments in R-60 zones within 1 mile of Metrorail transit stations) could benefit from a more extensive GHG emission study showing how carbon would be released in the form of trees cut down by densifying around transit corridors, vs the carbon saved by transit-oriented development.³

² Final Report Climate Assessment Recommendations for Master Plans and Zoning Text Amendments in Montgomery County. ICF. 2022. Available at: https://montgomeryplanningboard.org/wp-content/uploads/2022/11/Attachment-A-ICF-Climate-Assessments-Recommendations_12-2-22-Final.pdf

³ Bill 52-22 and ZTA 20-07. Landlord-Tenant Relations - Protection Against Rent Gouging Near Transit Available at: <https://apps.montgomerycountymd.gov/ccllims/BillDetailsPage?RecordId=2690&fullTextSearch=zta%20AND%2020-07>



We recommend that some particularly impactful ZTAs (such as 20-07) also receive the same 4-step climate assessment review process as is proposed to be done for Master Plans. The workflow for deciding on the assessment process (3-step or 4-step) for a ZTA should begin with a decisional step that includes a qualitative analysis of whether significant GHG emissions are likely from any given ZTA, and then proceed to either the 3-step or 4-step process. An analogue to this decisional process is the “Finding of No Significant Impact” (FONSI) document that allows a National Environmental Policy Act (NEPA) assessment to proceed to the less-involved Environmental Assessment versus the more-involved Environmental Impact Statement.

- **Data Updates:** Continue to use the best available data to create the most up to date and accurate climate reports and review the process of creating these reports on a repeating cycle. For example, for forest loss we recommend using the recently published Maryland Forest Technical Study by the Harry Hughes Center data and report.⁴

On behalf of Nature Forward and our 28,000 members and supporters, we recommend that the Planning Board incorporate our comments and recommendations.

Sincerely,

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MD Conservation Advocate

Nature Forward

(Formerly Audubon Naturalist Society)

⁴ Maryland Forest Technical Study. 2022. The Harry Hughes Center for Agro-Ecology. Available at: <https://www.chesapeakeconservancy.org/mdforeststudy2022>