

Racial Equity and Social Justice (RESJ) Impact Statement

Office of Legislative Oversight

ZTA 26-03: Biohealth Priority Campus – Eligibility

SUMMARY

The Office of Legislative Oversight (OLO) finds the anticipated racial equity and social justice (RESJ) impact of ZTA 26-03 is indeterminate. Several factors are unknown to determine how changes in Biohealth Priority Campus eligibility requirements will impact RESJ in the County.

PURPOSE OF RESJ STATEMENTS

RESJ impact statements (RESJIS) for zoning text amendments (ZTAs) evaluate the anticipated impact of ZTAs on racial equity and social justice in the County. RESJ is a **process** that focuses on centering the needs, leadership, and power of Black, Indigenous, and other People of Color (BIPOC) and communities with low incomes. RESJ is also a **goal** of eliminating racial and social inequities. Applying a RESJ lens is essential to achieve RESJ.¹ This involves seeing, thinking, and working differently to address the racial and social inequities that cause racial and social disparities.²

PURPOSE OF ZTA 26-03

The Biohealth Priority Campus designation was created in 2022 as a new commercial use category. The new category was created with a goal of growing the biohealth sector and advancing economic development in the County.³

The purpose of ZTA 26-03 is to amend the definition of a Biohealth Priority Campus. If enacted, ZTA 26-03 would lower the threshold to qualify for this use.⁴ Table 1 in the Appendix compares the current requirements for a project to qualify as a Biohealth Priority Campus and the proposed changes in ZTA 26-03.

The Biohealth Priority Campus designation enables projects to go through the Expedited Approval Plan process, which can cut a project's approval timeline in half.⁵ Table 2 in the Appendix compares the standard and expedited approval plan processes.

As of February 2026, there have been no projects in the County that have been developed as a Biohealth Priority Campus.⁶ According to Montgomery Planning, ZTA 26-03 is intended to make it easier for biohealth companies to use this designation, allowing them to find, rehabilitate, and move into existing properties in the County more quickly.⁷

The Council introduced ZTA 26-03 on January 27, 2026.

This RESJIS builds on the one for ZTA 21-09, Office and Professional-Biohealth Priority Campus.⁸ Please refer to this statement for more detail on historical and contemporary racial inequities in land use and economic development.

BIOHEALTH INDUSTRY AND RACIAL EQUITY

Systemic racism has fostered racial inequities in health care and the biohealth industry.⁹ For example, it was not until the 1960s with the passage of Medicare and Medicaid that health care services became widely integrated.¹⁰ Educational and occupational segregation continue to limit the participation of Black and Latinx people as professionals in Science, Technology, Engineering, and Mathematics (STEM) fields, which include the biohealth industry. Between 2011 and 2021, the STEM workforce in the U.S. gradually diversified, with increased representation of women and Latinx, Black, and

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Indigenous employees in STEM fields.¹¹ However, a 2021 survey of 99 biotech firms (a subset of the biohealth industry) in the U.S. still found an under-representation of BIPOC employees and executives as:¹²

- Black people accounted for 6 percent of biotech employees and 3 percent of executives.
- Latinx people accounted for 7 percent of biotech employees and 4 percent of executives.
- Native Americans, Alaskan Natives, Native Hawaiians, and Pacific Islanders accounted for 0.6 percent of biotech employees and 2 percent of executives.
- Asian people accounted for 21 percent of biotech employees and 15 percent of executives.
- White people accounted for 56 percent of biotech employees and 72 percent of executives.

Racial and ethnic inequities in the biohealth workforce make it harder for BIPOC workers to access these high-paying jobs. In Maryland, the median annual pay for biomedical scientist positions in 2025 was \$83,500.¹³ These wages are an important economic driver for Montgomery County because in 2024, the Biohealth Capital Region (which includes the County) employed an estimated 136,000 workers and ranked third among U.S. biopharma hubs.¹⁴ In 2025, biopharmaceutical company AstraZeneca opened a new \$300 million manufacturing facility in Rockville that is expected to create more than 150 skilled jobs in the region.¹⁵

ANTICIPATED RESJ IMPACTS

In response to OLO's recommended amendments for ZTA 21-09, the County Council adopted the Biohealth Opportunity Zone Incentive Program to "encourage investments in biohealth in traditionally under-invested communities."¹⁶ Under the program, any Biohealth Priority Campus located in a County Opportunity Zone¹⁷ will receive \$250,000 through the County's Economic Development Fund (EDF) upon receipt of its occupancy permit.¹⁸ The resolution does not specify how these grant funds must be used other than to "address the need for economic development in underserved communities in the County."¹⁹ As of February 2026, there have been no recipients of this grant funding since no projects in the County have been designated as a Biohealth Priority Campus.²⁰

To determine the anticipated impact of ZTA 26-03 on RESJ in the County, OLO considers two related questions:

- Who would primarily benefit or be burdened by this ZTA?
- What racial and social inequities could passage of this ZTA weaken or strengthen?

OLO identified the following groups who could be impacted by ZTA 26-03:

- **Biohealth Business Owners and Shareholders.** If adopted, ZTA 26-03 will allow smaller projects to be defined as a Biohealth Priority Campus and qualify for an expedited review. Available data from the Census' 2023 Annual Business Survey shows that White and Asian people disproportionately own Professional, Scientific, and Technical Services as well as Health Care and Social Assistance firms compared to their share of the County population (see Appendix Table 3). Black and Latinx people are significantly underrepresented in business ownership across all sectors, including the biohealth industry. Furthermore, if the biohealth companies are publicly traded, most of the benefit will likely go to White community members who own stock at higher rates than BIPOC community members.²¹ As such, if the ZTA results in more biohealth campuses in the County, the direct economic benefits will most likely go towards business owners and shareholders who are predominantly White and Asian.

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- **Biohealth Workers.** As described above, national data on the biotech workforce show Black and Latinx people are under-represented in the biotech industry. The data suggests Asian people are over-represented and White people account for a majority of the biotech workforce. As such, Asian and White workers would disproportionately benefit from growth in the number of biotech jobs in the County.

Of note, for every Biohealth Priority Campus designated in an Opportunity Zone, the County will grant \$250,000 to biohealth companies to be used for economic development in “under-invested communities.”²² Black and Latinx community members could disproportionately benefit from an increase in Biohealth Priority Campus designations if the increase fostered subsequent investments in the communities where they reside. However, there are several unanswered questions for how ZTA 26-03 coupled with the grant program will ultimately benefit BIPOC communities. These include but are not limited to:

1. Will lowering the square footage requirement substantially increase biohealth priority campuses in County Opportunity Zones?
2. To what extent will grant funds be used to benefit local community members, including providing employment opportunities for BIPOC community members?

Taken together, OLO finds the anticipated racial equity and social justice (RESJ) impact of ZTA 26-03 is indeterminate.

RECOMMENDED AMENDMENTS

The County’s RESJ Act requires OLO to consider whether to recommend amendments to ZTAs that could reduce racial and social inequities and advance RESJ.²³ OLO finds the RESJ impact of ZTA 26-03 is indeterminate. As such, OLO does not offer any recommended amendments for this ZTA. Should the Council seek to further advance RESJ through the Biohealth Opportunity Zone Incentive Program tied to the Biohealth Priority Campus designation, OLO offers two policy options for consideration as a companion to this ZTA:

- **Invest in Biohealth workforce development opportunities for BIPOC businesses and community members.** To ensure that BIPOC businesses and community members benefit from the expansion of the Biohealth industry in the County, companies receiving grant funding from the Biohealth Opportunity Zone Incentive Program could be required to:
 - A) Provide opportunities to BIPOC businesses that offer spillover benefits from Biohealth industry expansion. For example, Biohealth firms could be encouraged to use BIPOC businesses as vendors to deliver goods and services on Biohealth campuses.
 - B) Partner with community members, educational institutions, and non-profit partners to deliver programs that increase Biohealth workforce opportunities for BIPOC community members. Grant recipients should also be encouraged to adopt equitable outreach practices and actively recruit within the County’s Opportunity Zones.
- **Require companies receiving grant funds to track and report data related to the company’s ownership, executive leadership, and employee composition by race and ethnicity.** According to the County Department of Finance, EDF grants are disbursed only after an agreement is made between the company receiving the funds and the County. Such an agreement usually includes reporting on planned uses of the funds such as capital improvements or job creation.²⁴ It is unclear the extent to which such an agreement could mandate reporting related to the company’s ownership, executive leadership, or employee composition by race and ethnicity. At present, these types of demographic questions—if they are asked at all—are completely voluntary. Companies

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do not have to provide demographic data to the Department of Finance to receive EDF grants.²⁵ Mandating such reporting would be critical to understand the impact these incentive funds might have on RESJ within the County’s Biohealth sector.

CAVEATS

Two caveats to this RESJIS should be noted. First, predicting the impact of ZTAs on RESJ is challenging due to data limitations, uncertainty, and other factors. Second, this RESJIS is intended to inform the Council’s decision-making process rather than determine it. Thus, any conclusion made in this statement does not represent OLO’s endorsement of, or objection to, the ZTA under consideration.

APPENDIX

Table 1: Requirements to be Defined as a Biohealth Priority Campus as Outlined in ZTA 26-03

Category	Current Requirements of Biohealth Priority Campus	Changes Made Under ZTA 26-03
Square footage	<ul style="list-style-type: none"> 150,000 square foot minimum of new space to be constructed, or 50,000 square feet of new space added to an existing building or group of buildings that qualifies as a Life Sciences or Research and Development Use 	<ul style="list-style-type: none"> 100,000 square foot minimum of new space to be constructed, or 100,000 square feet of new space repurposed from an Office and Professional Use,²⁶ or 25,000 square feet of new space to be added to an existing building or group of buildings that qualifies as a Life Sciences or Research and Development Use
Location	Located on property: <ul style="list-style-type: none"> within a red policy area,²⁷ within an opportunity zone, or within a half mile of a planned or existing Bus Rapid Transit route 	No changes
Business use	<ul style="list-style-type: none"> headquarters or other primary place of business of a single commercial or industrial organization, including ancillary uses 	No changes

Source: [Introduction Staff Report for ZTA 26-03](#), Montgomery County Council, Introduced January 27, 2026.

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Table 2: Comparison of Standard Approval Process versus the Expedited Plan Process

Feature	Standard Process	Expedited Process
Sketch Plan and Site Plan	Required	Biohealth Priority Campus Plan replaces the sketch and site plan
Development Review Committee (DRC)	Required meeting	Expedited Approval Plans for a Biohealth Priority Campus do not go to DRC
State and County Agency Comment Period	Most agencies require 45-day review period	Due within 15 days after application is accepted
Planning Board Hearing Timing	Within 120 days	Within 60 days

Source: [Section 7.3.5. Expedited Approval Plan](#) and [Expedited Approval Plan - Biohealth Priority Campus](#), Montgomery Planning.

Table 3: Number and Percent of Business Ownership in Select Sectors by Race and Ethnicity²⁸ in Montgomery County

Race and Ethnicity of Business Owner	Number and Percent of Firms Owned in Professional, Scientific, and Technical Services (NAICS 54)	Number and Percent of Firms Owned in Health Care and Social Assistance (NAICS 62)	Number and Percent of Firms Owned across All Sectors (NAICS 00)	Overall Percent of County Population by Race and Ethnicity
Asian	1,126 (20.7%)	521 (18.0%)	3,872 (19.1%)	15.4
Black	497 (9.2%)	272 (9.4%)	1,761 (8.7%)	18.6
American Indian or Alaska Native	11 (0.20%)	—	—	0.6
Pacific Islander	—	—	—	0.0
White	3,527 (65.0%)	1,801 (62.1%)	12,884 (63.7%)	42.1
Hispanic or Latinx (of any race)	295 (5.4%)	—	1,870 (9.2%)	21.0

Source: OLO Analysis of 2023 Annual Business Survey ([Table AB2300CSA01](#)) and 2024 American Community Survey 5-Year Estimates ([Table DP05](#)).

¹ Definition of racial equity and social justice adopted from [Marlysa Gamblin et al., “Applying a Racial Equity Lens into Federal Nutrition Programs,” Bread for the World](#) and from [Racial Equity Tools](#).

² Ibid.

³ See [ZTA 21-09](#), adopted February 15, 2022.

⁴ [Introduction Staff Report for ZTA 26-03](#), Montgomery County Council, Introduced January 27, 2026.

⁵ See [Section 7.3.5. Expedited Approval Plan](#) and [Mixed Income Housing Community Plan - Montgomery Planning](#)

⁶ OLO conversation with Montgomery Planning staff. February 6, 2026.

⁷ Ibid.

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⁸ [RESJIS for ZTA 21-09](#), Office of Legislative Oversight, December 2, 2021.

⁹ H. Washington, *Medical Apartheid: The Dark History of Medical Experimentation on Black Americans from Colonial Times to the Present*, *Doubleday*, 2007.

¹⁰ W.M. Byrd & L.A. Clayton, [Race, Medicine, and Health Care in the United States: A Historical Survey](#), *Journal of the National Medical Association*, 2001.

¹¹ National Center for Science and Engineering Statistics (NCSES). [Diversity and STEM: Women, Minorities, and Persons with Disabilities 2023](#). Special Report NSF 23-315. Alexandria, VA: National Science Foundation, 2023.

¹² Coqual/Biotechnology Innovation Organization, [Measuring Diversity in the Biotech Industry: Tracking Progress in Small and Large Companies](#), June 2022

¹³ ZipRecruiter, [Biomedical Scientist Salary in Maryland](#), December 2025.

¹⁴ A. Philippidis, [Top 10 U.S. Biopharma Clusters 2024](#), *Genetic Engineering and Biotechnology News*, July 24, 2024.

¹⁵ Montgomery County Press Release, [AstraZeneca Opens \\$300 Million Cell Therapy Manufacturing Facility in Montgomery County](#), May 9, 2025.

¹⁶ Montgomery County Press Release, [Approved Opportunity Zone Incentive Program will Attract and Retain Biohealth Companies in Montgomery County](#), March 15, 2022.

¹⁷ Opportunity Zones are intended to spur economic development in low-income communities by providing tax benefits to investors. The U.S. Treasury has designated Maryland's 149 Opportunity Zones, which at a minimum must be a low-income census tract with an individual poverty rate of at least 20 percent and median family income no greater than 80 percent of the area median income. See Maryland Department of Housing and Community Development, [Maryland Opportunity Zones](#).

¹⁸ [Resolution No.: 19-1186](#), Montgomery County Council, March 15, 2022.

¹⁹ Ibid.

²⁰ OLO Conversation with Montgomery Planning staff. January 29, 2026.

²¹ National polling suggests stock ownership varies significantly by race and ethnicity, with an estimated 70 percent of White adults owning stock, compared with 53 percent of Black adults and 38 percent of Hispanic adults.

[What Percentage of Americans Own Stock?](#) Based on combined data from April 1-22, 2024, and April 1-14, 2025, Gallup polls.

²² Montgomery County Press Release, [Approved Opportunity Zone Incentive Program will Attract and Retain Biohealth Companies in Montgomery County](#), March 15, 2022.

²³ [Bill 44-20, Racial Equity and Social Justice – Impact Statements – Advisory Committee – Amendments, Montgomery County Council](#).

²⁴ OLO conversation with the Department of Finance staff. February 13, 2026.

²⁵ Ibid.

²⁶ "Office and Professional" includes the uses under [Section 3.5.8.](#), which are Biohealth Priority Campus, Life Sciences, Office, Research and Development, and Signature Business Headquarters.

²⁷ The County is divided into policy areas, and each policy area is assigned a color for transportation purposes. Red Policy Areas, also known as Metro Station Areas Policy Areas (MSPA), are one of the four areas within the Transportation Policy Area. MSPAs are characterized by high-density development and the availability of premium transit service (Metrorail, MARC). [LATR Guidelines January 2025](#), Montgomery Planning.

²⁸ Race is inclusive of Latinx origin. Estimates for Native American and Pacific Islander community members are not available for some data points.