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## MEMORANDUM

To: The Honorable Members of the Land Use & Transportation Committee  
From: Justin A. Williams, Interim Executive Director  
CC: Geoffrey Veale, Zoning Administrator  
Date: April 23, 2026  
Re: CCB #26-0158 – Data Centers – Moratorium

*This report was prepared by the Interim Executive Director and has not received formal approval by the full Board. It does, however, incorporate input and feedback from Board members provided during the Board’s discussion of this legislation at its April 21, 2026 hearing.*

Council Bill 26-0158 would impose a one-year moratorium on data centers in Baltimore City. While this approach is consistent with a growing national trend, the Board identifies several concerns with the bill as drafted that the Council may wish to address through amendment. In particular, the Board recommends that the Council consider:

- (1) adding an accessory-use carve-out to protect biotech, pharmaceutical, and advanced manufacturing facilities from the bill’s definitional sweep;
- (2) replacing or clarifying the “capable of using 10 megawatts” threshold, which presents administrability challenges for the Office of the Zoning Administrator;
- (3) adding a study requirement to ensure that a post-moratorium regulatory framework is developed during the moratorium period;
- (4) aligning the sunset provision so that all of the bill’s proposed amendments of the Zoning Code expire together; and
- (5) correcting a typographical omission in Section 4.

Finally, the Board also draws the Council’s attention to the energy-cost asymmetry at the heart of this bill: Baltimore City ratepayers will absorb the regional grid costs driven by data center demand regardless of whether data centers locate within City limits, and a moratorium forecloses the City’s ability to capture the countervailing tax revenue that data centers generate.

### I. Policy Context

The BMZA acknowledges at the outset that this bill reflects a policy judgment that is ultimately the Council’s to make. The decision to impose a moratorium on data centers aligns with a national trend: as of early 2026, at least 63 local data center

moratorium actions have been introduced, considered, or adopted across the country, and multiple states (including New York, Oklahoma, South Dakota, and Vermont) have introduced moratorium legislation at the state level.<sup>1</sup> Most recently, the City of Denver announced a moratorium on new data center development while it reassesses zoning, water consumption, and energy impacts.<sup>2</sup> Locally, the Maryland General Assembly has been actively engaged on data center energy policy, and several data center proposals in Baltimore County, Montgomery County, Prince George’s County, and Frederick County have prompted statewide regulatory discussions.

However, BMZA offers this report in the interest of ensuring that the Council has a full understanding of the practical zoning and land-use implications of the bill as drafted, along with the economic tradeoffs the moratorium entails. The Board raises several technical and policy concerns that the Council may wish to address through amendment or, alternatively, through a more tailored regulatory framework that avoids a blanket prohibition.

## II. The Energy-Cost Asymmetry: Baltimore Bears Regional Grid Costs Regardless

The primary policy rationale for data center moratoriums, in Baltimore and nationally, is the strain that data centers place on the electrical grid and the resulting increase in energy costs for residential ratepayers. This concern is well-documented and serious. PJM Interconnection’s capacity auction for the 2026–2027 delivery year cleared at a record \$329.17 per megawatt-day, a roughly tenfold increase over the 2024–2025 auction.<sup>3</sup> An independent analysis found that existing and projected data center loads were responsible for approximately 63% of that price increase, adding an estimated \$9.3 billion in capacity costs absorbed by all ratepayers across PJM’s 13-state territory.<sup>4</sup> Maryland has been particularly affected: the state has retired approximately 6,000 megawatts of generation capacity since 2018 while adding only 1,600 megawatts, and now relies on other states for roughly 40% of its annual electricity needs.<sup>5</sup> Average residential electricity prices in Maryland rose approximately 18% between October 2024 and October 2025.<sup>6</sup>

The critical point for the Council’s consideration, however, is that *Baltimore City ratepayers are already absorbing these costs*—and will continue to absorb them—regardless of whether any data centers locate within City limits because Baltimore sits within the PJM footprint. The capacity charges that drive electricity price increases are assessed regionally, not locally. A moratorium that keeps data centers out of Baltimore while they continue to develop in Frederick County, Northern Virginia, and other PJM jurisdictions means the City bears the full energy-cost burden without capturing any of the countervailing tax revenue that data centers generate. This is the central asymmetry in the bill’s cost-benefit calculus.

In Loudoun County, Virginia, the world’s largest concentration of data centers, data centers generate nearly half of all property tax revenue and an estimated \$26 in tax

revenue for every \$1 in county services they require.<sup>7</sup> The assessed value per square foot of data centers in Loudoun County is approximately \$609, roughly triple that of other commercial uses, and data center revenue growth has enabled the county to lower its real property tax rate for over a decade.<sup>8</sup> While Baltimore City's fiscal context differs from Loudoun County's, and the City has no existing data center incentive framework, the revenue potential of this use category for a city with Baltimore's property tax rate and fiscal needs warrants careful consideration before the use is categorically prohibited, even temporarily.

### III. If the Concern Is Noise or Air Quality, Existing Tools May Suffice

Not all of the concerns that motivate data center moratoriums are equally applicable to Baltimore City or equally resistant to existing regulatory tools.

- **Water consumption.** Data centers use significant quantities of water for cooling, particularly those employing evaporative cooling systems. However, data centers are also predictable, large-volume, consistent water users. For a municipal water utility that must plan capital improvements around demand forecasts, a large steady user can actually facilitate infrastructure planning and reduce the per-unit cost of system upgrades in contrast to the variable demand patterns of smaller, dispersed users. The Council may wish to consult with the Department of Public Works on whether data center water demand would represent a net planning benefit or burden for the City's water and wastewater systems.
- **Noise.** Data center cooling systems, particularly rooftop HVAC units, cooling towers, and backup diesel generators, can generate significant noise. However, the Zoning Code already contains performance standards governing noise emissions from industrial and commercial uses. These standards could be supplemented with data-center-specific requirements (e.g., maximum decibel levels measured at the property line, restrictions on generator testing hours) without a moratorium. Multiple jurisdictions have adopted such requirements as part of data center overlay districts or conditional-use standards without prohibiting the use outright. For example, Albemarle County, Virginia limits routine generator maintenance/testing to certain times and requires generators be enclosed in a structure that limits sound to 70 dBA measured 23 feet from the generator.<sup>9</sup>
- **Air quality from backup generators.** Data centers maintain diesel or natural gas generators for emergency backup power. Generator emissions are regulated under federal and state environmental law, and the City *could* impose additional conditions through the zoning or permitting process. For example, Albemarle County, Virginia released draft regulations that would, inter alia, mandate that generators meet EPA Tier 4 emissions standards.<sup>10</sup>

The point is not that these concerns are trivial, but that zoning and environmental performance standards are better calibrated to address them than a citywide use

prohibition. A moratorium is a blunt instrument that forecloses the use entirely; targeted performance standards allow the use under conditions that protect surrounding properties.

#### **IV. The 10-Megawatt Definition: Technical Concerns**

##### **A. The “Capable of Using” Standard Is Difficult to Administer**

The bill defines a data center as a facility “capable of using 10 megawatts or more of electricity.” This language raises administrability questions that the Council may wish to consider. Determining whether a proposed facility’s electrical design capacity crosses the 10 MW threshold is a materially different exercise from the kinds of determinations that zoning administration typically involves; building height, lot coverage, setbacks, and use classification are observable characteristics that can be verified through site plan and architectural review. Electrical design capacity, by contrast, is embedded in a facility’s mechanical and electrical engineering plans and may require coordination with the Department of Housing and Community Development’s plan review process and Baltimore Gas and Electric. Asking the Office of the Zoning Administrator to make threshold electrical-capacity determinations would represent a significant step beyond the office’s current practice.

The “capable of using” formulation also raises temporal questions. A facility might be designed with an *initial* electrical capacity of 7 MW but with infrastructure sized to *accommodate* future expansion to 12 MW. Is the facility “capable of using” 10 MW at the time of initial permitting, or only when it actually draws that amount? The bill does not address phased buildout, and the answer could determine whether the moratorium applies.

##### **B. The Dedicated-Substation Proxy: An Alternative Approach**

Several jurisdictions have used the presence of a dedicated electrical substation as a proxy for data center scale, rather than attempting to measure electrical capacity directly. In the data center industry, facilities drawing more than approximately 10 MW of power are typically served via the utility’s transmission or sub-transmission system and require a dedicated substation—either built by the utility or by the data center operator—to step voltage down to distribution levels. The cost of such a substation (typically \$3–7 million) makes it a reliable indicator that a facility has crossed the threshold from an ordinary commercial user into large-scale data processing.<sup>11</sup>

DeKalb County, Georgia, for example, incorporates the substation requirement into its tiered data center classification system: a “minor” data center has no substation; a “medium” data center may include one; and a “major” or “campus” data center requires one.<sup>12</sup> Loudoun County, Virginia’s Phase 2 data center regulatory review is developing use-specific zoning standards for both data centers and the utility substations

that serve them, recognizing that the two uses are functionally interdependent and should be regulated together.<sup>13</sup>

Critically for the Council's purposes, dedicated substations are typically located on-site or immediately adjacent to the data center campus. Data center operators prefer on-site substations because they provide faster deployment timelines, operational control, flexibility for future expansion, and enhanced security.<sup>14</sup> The on-site substation model means that the Office of the Zoning Administrator could identify the presence of a data center at the scale the bill targets by reviewing site plan submissions for substation infrastructure, which is a far more administrable standard than attempting to evaluate electrical engineering capacity.<sup>15</sup>

If the Council proceeds with a megawatt-based threshold, **the Board recommends, at minimum, that the bill specify:**

- (a) **the point in the development process at which the determination is made** (building permit, use-and-occupancy, or site plan approval),
- (b) **whether the standard is based on designed capacity or actual consumption**, and
- (c) **which City agency is responsible for making the determination.**

## **V. The R&D/Biotech Overbreadth Concern**

### **A. The Bill's Definition Could Capture Non-Data-Center Facilities**

The bill defines a data center as a facility "used for remote storage, processing, and distribution of data" that is "capable of using 10 megawatts or more of electricity." While the "remote storage, processing, and distribution" element distinguishes data centers from ordinary commercial server rooms, it does not clearly exempt computationally intensive research and development operations that process data remotely or collaboratively.

This is not a hypothetical concern. Pharmaceutical plants have energy use intensities approximately 14 times higher than standard commercial buildings,<sup>16</sup> and research laboratories consume 5 to 10 times more energy per square foot than office space.<sup>17</sup> A large biotech campus conducting computationally intensive work, e.g., protein folding simulations, genomic sequencing, molecular modeling, combines substantial server loads with the energy-intensive HVAC, ventilation, and specialized equipment demands inherent to laboratory operations. A 200,000+ square foot biotech R&D facility with significant computational infrastructure could plausibly approach or exceed 10 MW of total electrical capacity, even though its primary function is research, not data storage.

## B. Baltimore’s Biotech Ecosystem Makes This a Concrete Risk

This concern has particular salience for Baltimore City, which is home to one of the most significant and rapidly growing biotech ecosystems on the East Coast. The University of Maryland BioPark, for example, encompasses 14 acres and nearly 1.2 million square feet of lab, office, health care, and community-oriented space across nine buildings, housing more than 30 companies and over 1,000 employees.<sup>18</sup>

The BioPark’s research ecosystem spans fields with substantial computational demands: genomics, vaccine development, drug discovery, biomedical engineering, stem cell biology, and digital therapeutics.<sup>19</sup> As these research enterprises grow in computational intensity, particularly in areas such as AI-driven drug discovery, protein structure modeling, and large-scale genomic sequencing, the energy footprint of a major biotech campus can scale rapidly. A 250,000-SF wet lab facility already consumes energy at rates 5 to 10 times that of comparable office space due to HVAC, ventilation, and specialized equipment requirements.<sup>20</sup> Adding significant computational infrastructure to serve collaborative, multi-institutional research workloads could push such a facility toward or beyond the 10 MW threshold; and if that computational work involves data shared with partner institutions across the University System of Maryland or the federal research agencies located in the region, the “remote storage, processing, and distribution of data” element of the bill’s definition could arguably be satisfied.

The City has invested significant political and financial capital in the BioPark and in Baltimore’s broader identity as a life sciences hub. The risk that the bill’s definition could create regulatory uncertainty for a growing biotech campus, or worse, inadvertently classify a computationally intensive research facility as a prohibited “data center,” warrants careful attention.

## C. The Bill’s R&D Exclusion Is One-Directional

The bill attempts to address the R&D/data center overlap by amending § 1-312(o)(3) to provide that a “research and development facility” does not include a data center. But this exclusion is one-directional: it tells us that *a data center is not an R&D facility*, but it does not tell us that an *R&D facility with a significant data processing component is not a data center*. If a biotech firm’s computational cluster meets the two-part definition, “remote storage, processing, and distribution of data” plus “10 MW capacity,” the firm could not claim exemption from the moratorium simply because its primary use is research. The bill lacks a carve-out for accessory data processing uses that are incidental to a primary non-data-center use.

The Council should consider adding an “accessory use” exception, similar to the approach taken by Albemarle County, Virginia and DeKalb County, Georgia, which exempts data processing operations that (a) are located on the same site as a primary

non-data-center use, (b) are operated by the primary user for its own data, and (c) do not exceed a specified percentage of the primary use's gross floor area (e.g., 25%).

## VI. Investment Signal and Lead-Time Concerns

Even a one-year moratorium sends a signal to the development and investment community that extends well beyond the moratorium's duration. Data center projects, and the biotech and advanced manufacturing investments that could be affected by the bill's definitional breadth, involve lead times that typically span several years from initial site selection to operational occupancy. Developers conduct site feasibility, secure utility interconnection agreements, obtain financing, and negotiate long-term power purchase arrangements well before applying for zoning or building permits. An uncertain regulatory environment, even a temporary one, can cause an investor or company to locate in a different jurisdiction and that decision is rarely reversed once the moratorium expires.

The same concern applies to the bill's sunset structure. As discussed below, the moratorium in Section 2 expires after one year, but the bill does not establish a study commission, reporting requirement, or regulatory framework development process during the moratorium period. An investor evaluating Baltimore during the moratorium year would not know whether the City intends to (a) permit data centers with conditions after the moratorium, (b) extend the moratorium, or (c) impose a permanent prohibition. That uncertainty compounds the moratorium's deterrent effect on investment.

## VII. Drafting and Structural Issues

### A. Section 4 Sunset Gap

Section 4 provides that Section 2 of the Ordinance (which adds data centers to the § 1-209 prohibited-uses list) expires one year after enactment. However, Section 3, which adds the new definition of "data center" at § 1-304(y) and amends the definitions of "Industrial: General," "Industrial: Light," and "Research and development facility," is not subject to the sunset.

When Section 2 sunsets, data centers will no longer appear on the prohibited-uses list, and the use will presumably become permissible again (subject to whatever use-table classification applies). But § 1-312(o)(3) will still exclude data centers from the definition of "research and development facility." This means a research facility that is also a data center will remain excluded from the R&D definition, potentially affecting which zoning districts it may locate in, even after the moratorium itself has ended. **The Council should consider whether this is the intended result or whether the R&D exclusion should also sunset with the moratorium.**

Additionally, Section 4 states that “Section 2 of this Ordinance shall remain effective for year following the date of enactment,” and thus **the article “one” appears to have been inadvertently omitted before “year.”**

## **B. No Use-Table Framework or Study Requirement**

The bill adds data centers to the prohibited-uses list but does not create a framework for how the use should be regulated after the moratorium expires. Data centers are not currently listed as a defined use in the Zoning Code’s use tables. When the moratorium sunsets, there will be no zoning district in which “data center” appears as a permitted, conditional, or accessory use, the term will exist as a defined term in the Code (§ 1-304(y)) and as an exclusion from the R&D definition (§ 1-312(o)(3)), but with no affirmative authorization anywhere in the use tables.

The bill also does not establish a study commission, task force, or interagency working group to develop a regulatory framework during the moratorium period. If the purpose of the moratorium is to give the City time to study the issue and develop appropriate regulations, as has been the stated rationale for moratoriums in Denver, New York, and other jurisdictions, the bill should include a mechanism for ensuring that work occurs.

Board members have also observed that a study should evaluate the opportunity cost of data center development on land that the City’s comprehensive plan and zoning framework have identified for housing or mixed-use development. Data centers are land-intensive, low-employment uses that can consume significant acreage in areas where the City has invested in planning for residential growth or higher-density mixed-use activity. This concern is analogous to the displacement of higher-value uses by self-storage facilities in neighborhoods planned for housing, a pattern the City has confronted in other zoning contexts. A moratorium without a companion study mechanism forecloses the Board’s ability to contribute to a use-table framework that balances data center siting against these competing land-use priorities, including a determination of which zoning districts, if any, should permit data centers and under what conditions.

## **VIII. Recommendation**

The BMZA recommends that the Council consider amending the bill to address the following concerns:

1. **Accessory-use carve-out.** Add an exemption for data processing operations that are accessory to a primary non-data-center use, to avoid unintended impacts on biotech, pharmaceutical, and advanced manufacturing facilities.
2. **Administrability of the 10 MW threshold.** Either (a) replace the “capable of using 10 megawatts” standard with a more administrable proxy (e.g., the presence of a dedicated electrical substation, square footage thresholds, or a tiered classification

system), or (b) specify the point at which the determination is made, the standard of measurement (design capacity vs. actual consumption), and the responsible agency.

3. **Study requirement.** Add a provision requiring the Planning Commission, in consultation with the Zoning Administrator, the Department of Housing and Community Development, BDC, the Department of Public Works, and BGE, to develop recommended zoning standards for data center uses and report to the Council before the moratorium expires.
4. **Sunset alignment.** Either (a) apply the sunset to all provisions of the bill, including the R&D exclusion, or (b) clarify the Council's intent regarding the post-moratorium treatment of the R&D/data center overlap.
5. **Typographical correction.** Correct the omission of "one" before "year" in Section 4.

If the Council chooses not to amend the bill, the Board takes no position on the underlying policy question of whether a moratorium is warranted, recognizing that this is a political judgment informed by considerations, including grid reliability, sustainability commitments, and community concerns about infrastructure impacts, which extend beyond BMZA's zoning-administration mandate. The Board does, however, urge the Council to consider the energy-cost asymmetry identified in Section III and the investment-signal concerns identified in Section VII as it weighs the costs and benefits of a citywide prohibition.

For any questions regarding this report or to discuss these concerns further, please contact **Justin Williams** at [justin.williams@baltimorecity.gov](mailto:justin.williams@baltimorecity.gov) or (410) 396-4301.

## ENDNOTES

1. Good Jobs First, *Data Center Moratorium Bills Are Spreading in 2026* (Mar. 10, 2026), <https://goodjobsfirst.org/data-center-moratorium-bills-are-spreading-in-2026/>; see also MultiState, *State Data Center Legislation in 2026 Tackles Energy and Tax Issues* (Feb. 20, 2026) (reporting more than 300 state data center bills filed across 30+ states), <https://www.multistate.us/insider/2026/2/20/state-data-center-legislation-in-2026-tackles-energy-and-tax-issues>
2. *Denver Proposes Data Center Moratorium Amid Tax Break, Environmental Debate*, Construction Owners (Feb. 28, 2026), <https://www.constructionowners.com/news/denver-weighs-data-center-moratorium>
3. PJM Interconnection, *2026/2027 Base Residual Auction Report* (July 22, 2025), <https://www.pjm.com/-/media/DotCom/markets-ops/rpm/rpm-auction-info/2026-2027/2026-2027-bra-report.pdf>; see also Introl, *PJM \$100B Rate Shock: Data Centers vs Ratepayers* (Feb. 28, 2026), <https://introl.com/blog/pjm-rate-shock-100-billion-data-center-electricity-2026>
4. Introl, *PJM \$100B Rate Shock: Data Centers vs Ratepayers* (Feb. 28, 2026) (citing analysis by the Natural Res. Def. Council estimating \$100 billion to \$163 billion in cumulative ratepayer costs through 2033).
5. Capital News Serv., *As Data Centers Multiply, Maryland's Power Grid Struggles to Keep Up*, Md. Reporter (Mar. 4, 2026) (citing PJM Interconnection report on Maryland's net electricity import position), <https://marylandreporter.com/2026/03/04/as-data-centers-multiply-marylands-power-grid-struggles-to-keep-up/>
6. *Id.* (citing U.S. Energy Info. Admin., state electricity price data, Oct. 2025).
7. Loudoun Cnty., Va., *FAQs: What Is the Benefit of the Data Center Industry to the County?*, <https://www.loudoun.gov/Faq.aspx>.
8. *Id.* (noting that absent the data center industry, the county's real property tax rate would likely exceed \$1.00 per \$100 in assessed value instead of the current \$0.805).
9. Albemarle Cnty., Va., Zoning Ordinance ch. 18, §5.1.65.D.
10. In July 2025, Albemarle County released a draft Phase 2 ordinance amendment that would have established a Data Center Overlay District with tiered size thresholds (Tier 1: up to 125,000 sq. ft. by right; Tier 2: up to 500,000 sq. ft. by right, with larger facilities requiring a special use permit in both tiers), along with detailed performance standards for noise, water use, generator testing, and building design. See Albemarle Cnty., *Read the Draft Ordinance, Data Center Regulations* (July 10, 2025), <https://engage.albemarle.org/data-center-regulations/news-feed/read-the-draft-ordinance>. On October 1, 2025, the Board of Supervisors indefinitely paused the Phase 2 process to evaluate potential legislation from the Virginia General Assembly. *Id.*
11. See BLS & Co., *How Utilities Attract Mission-Critical Facilities*, <https://www.blsstrategies.com/insights-press/how-utilities-attract-mission-critical-facilities> (stating that most large data center facilities over 10 MW require the operator to design, construct, and maintain a substation at a cost of \$3–7 million).
12. See DeKalb Cnty., Ga., *Proposed Text Amendment TA-25-1247647* (Draft 3, updated Nov. 4, 2025); DeKalb Cnty. Dep't of Planning & Sustainability, *Data Center Text Amendment*, <https://engagedekalb.dekalbcountyga.gov/data-center-text-amendment>. The ordinance establishes a five-tier classification: (1) *Data Center, Accessory* — permitted on parcels zoned Office-Institutional (OI) and Office-Distribution (OD) as an accessory use if under 2,000 square feet; (2) *Data Center, Minor* — less than 20,000 square feet, without a substation; (3) *Data Center, Medium* — between 20,000 and 99,999 square feet, which may include a substation; (4) *Data Center, Major* — between 100,000 and 499,999 square feet, requiring a substation; and (5) *Data Center, Campus* — a geographically contiguous development of 500,000 square feet or more. *Id.*
13. Loudoun Cnty., Va., Bd. of Supervisors, *Data Center Standards & Locations* (CPAM-2024-0001 & ZOAM-2024-0001), <https://www.loudoun.gov/5990/Data-Center-Standards-Locations>. Phase 1, approved March 18, 2025, amended the Loudoun County 2019 Comprehensive Plan and Zoning Ordinance to designate data centers as a conditional or special exception use in areas where the use was previously permitted by right. *Id.* Phase 2, currently underway, is focused on establishing new policy guidance and use-specific zoning standards for both data centers and utility substations. *Id.*; see also Loudoun Cnty., Va., Dep't of Econ. Dev., *FAQs: Data Centers* —

Tax Revenues and the County Budget, <https://www.loudoun.gov/faq.aspx> (noting that much of the data center development in Loudoun County was permitted by right until March 2025).

14. Stream Data Centers, *Substation*, <https://www.streamdatacenters.com/resource-library/glossary/substation/> (last visited Apr. 2026).
15. To be clear, the substation-as-proxy approach is not perfect. A substation application could theoretically be filed by the utility provider or a different private developer before the data center operator files its own zoning application, creating a sequencing gap. And a utility substation serving multiple commercial users would not, standing alone, indicate data center use. But the substation standard is at least observable at the site-plan level and does not require the Zoning Administrator to make electrical engineering judgments that fall outside the office's expertise.
16. *Business Insights: Three Things to Know About Biomanufacturing Reshoring*, CBRE (Oct. 14, 2025), <https://www.cbre.com/insights/articles/business-insights-three-things-to-know-about-biomanufacturing-reshoring>.
17. Nat'l Renewable Energy Lab'y, *Laboratories for the 21st Century: An Introduction to Low-Power Design 1* (2008), <https://www.nrel.gov/docs/fy08osti/29413.pdf> (prepared for the U.S. Dep't of Energy).
18. See Univ. of Md. BioPark, *Mission & History*, <https://www.umbiopark.com/biopark/mission-history>; Ed Gunts, *4MLK Life Science Hub Opens at the University of Maryland BioPark*, Balt. Fishbowl (Jan. 16, 2025) <https://baltimorefishbowl.com/stories/4mlk-life-science-hub-opens-at-the-university-of-maryland-biopark>.
19. See 4MLK, <https://www.4mlk.com/> (listing UMB research fields including transplantation, genomics, cancer, vaccine development, drug discovery, and digital therapeutics).
20. U.S. Dep't of Energy, Fed. Energy Mgmt. Program, *Energy Efficiency in Laboratories*, <https://www.energy.gov/femp/energy-efficiency-laboratories>; see also My Green Lab, *Sustainable Energy Solutions for Laboratories*, <https://mygreenlab.org/resources/energy/> (noting laboratories are recognized as the most energy-intensive facilities after data centers).