OFFICE OF THE COUNTY EXECUTIVE

Marc Elrich
County Executive

September 10, 2026

Artie Harris, Chair
Montgomery County Planning Board
2425 Reedie Drive, 14th Floor
Wheaton, Maryland 20902

Subject: County Executive and Departmental Comments regarding the Friendship Heights Sector Plan

Dear Chair Harris,

Pursuant to Sec. 33A-5 of the County Code, I am submitting my comments on the Friendship Heights Sector Plan in advance of the public hearings to be held on September 10 and 14, 2026. Attached are memos previously sent to you from the Department of Environmental Protection (DEP), Department of Transportation (DOT), and the Montgomery County Police Department (MCPD). The departments are available to answer any questions you may have and look forward to working with you and your staff throughout the review process.

I share the serious concerns of DEP and DOT and note the need to address the public safety comments of MCPD. Their analysis should be an important part of your deliberations on the Sector Plan. But before I highlight some of their comments, I want to address another issue.

The shadow looming over this entire draft sector plan is the inexplicable decision of the Planning Board to approve a site plan for Friendship Commons, a major redevelopment of the Geico tract, in the middle of its process of making recommendations for that tract in the Sector Plan.

The Board approved a site plan for the Geico tract on July 30, 2026, two weeks after approving the Public Hearing Draft. The timing of these actions irrevocably compromised the process in at least two ways. First, the site plan was approved despite pending litigation that could change what may be redeveloped on the site. Second, the approved site plan compromises – indeed, conflicts with – information and "key recommendations" presented in the Draft Plan, resulting in statements that are incorrect and misleading. For example, Map 19 on page 99 of the Public Hearing Draft shows "Existing Tree Canopy." If the developer proceeds with the site plan you approved, almost all of the trees will be gone. Review of the Draft Plan will be unfair and

arbitrary unless the County Council and community members have accurate information about how many trees will be removed and how many, if any, will remain on the rest of the Geico tract still being reviewed in the Sector Plan. There must be clarification as to what parts of the July 30th decision apply only to the area of the approved development, and what parts apply to the entire 26-acre GEICO tract. And if the environmental recommendations on the various properties are not changed to provide real environmental protections, the "key recommendation" to protect the environmental elements must be removed entirely. In fact, the entire section about the GEICO tract (pages 130-136) must be rewritten to reflect the changes to the site that will result from the now-approved site plan. It is no longer "the largest opportunity site in the Plan area." The muddled information now in the Draft Plan is a troubling outcome of your decision to allow it to proceed through the process despite changes to the signature site that affect the entire Plan area.

Like the discussion of the Geico tract, the environmental discussion is confusing, vague, and as written, is more likely to lead to increased degradation of the environment that is contrary to the County's environmental standards.

Please read DEP's memo carefully. It expresses concerns about the lack of clear requirements for tree preservation, the increased loss of trees on the GEICO tract, and the failure to require tree planting in the public right-of-ways (ROWs). The memo notes many opportunities to add language to increase tree canopy and reduce impervious surfaces, including a recommendation for an imperviousness cap on each developable property. (Sadly, the Planning Board's July 30th decision allows an **increase** in impervious surface on the GEICO tract.)

DEP's memo emphasizes the importance of integrating stormwater management and tree canopy coverage into transportation planning and design from the outset. It also points out that, while it supports nature-based solutions and tree protection, these practices do not adequately address flooding, which is becoming an increasingly significant problem. The memo urges you to integrate the results of flood-risk modeling for the Little Falls Branch watershed by identifying flood-prone areas and proposing ways to mitigate the risks.

DOT's memo raises concerns about the data on the extension of dedicated bus lanes to Wisconsin Avenue, as well as the need to add detail to the Draft Plan's open-ended recommendation to abandon Wisconsin Circle and the bus terminal that is on top of the main entrance to the Friendship Heights Metro station.

See item #17 in the detailed technical comments attached to the DOT memo. It recommends replacing all of Bullet 3 (Bus Loop) with language that better highlights the Draft Plan's goals and coordinates with WMATA, MCDOT, and relevant jurisdictions. DOT's proposed changes are essential because as written now, the Draft Plan does not require that the new bus terminal provide the same level of connectivity, accessibility and ease of navigation for all users that is provided currently. In plain language, the public transportation system that is needed to support existing and new housing would be diminished if the new bus terminal is farther away from the Metro than the existing one, and if it is designed in a way that discourages, rather than encourages, increased use of public transit. The Draft Plan's recommendation, whether intended or not, places a higher priority on the private sector's maximization of its

development near the Metro than on the county's goal to incentivize public transit by creating seamless, efficient connections to make the speed of public transit more competitive with cars.

The only "opportunity sites" identified in the Plan are for more housing, much of it in high-rises, even though Planning staff's public outreach showed clear support among a majority of residents for mid-rise housing and, most of all, for more parks and green open space. There has also been an outpouring of support for tree preservation, which prevents heat islands.

The primary recommendations of the Draft Plan are in direct contradiction of those goals. There are no "opportunity sites" for more parks, nor for the preservation of mature tree canopy, or even for improved transportation to support the proposed addition of 4,700 new housing units – more than double the current number. In fact, there are no new open spaces, merely leftover private spaces on some of the properties targeted for development. Nor is there an acknowledgement that the Village of Friendship Heights is one of the most densely populated census-designated places in the United States; its extreme density is even greater than the borough of Manhattan. (Friendship Heights Village, Maryland - Wikipedia) See the memo from MCPD, which points out the potential policy impacts on departmental operations that could result from this marked increase in residential population. The scant discussion of substantially more housing does not include an in-depth analysis of the 4,200 housing units primarily comprised of multifamily buildings in the downtown core. There is no analysis of the existing multifamily units – what size are they? How many are rentals? How many are owned? What are the average rental rates or costs of ownership, and how do these compare to the expected rental rates and ownership costs of the proposed new MPDUs and market-rate housing? And how do these averages – existing and future – compare with countywide averages? Why does the Draft Plan recommend a 15% requirement for MPDUs instead of an increased requirement? Would more than doubling the number of housing units adequately address the needs of an area that needs more affordable – and deeply affordable – housing?

The Draft Plan makes no recommendations for economic development in Friendship Heights, despite the fact that GEICO, the third largest auto insurer in the United States, successfully operated its headquarters there for more than 65 years. The Plan also overlooks the findings of the economic consulting firm hired to do a market study.

Page 11 of a July 2026 Planning staff Power Point highlights the market study's main findings, noting the unusual presence of a medical cluster without a nearby hospital, further stating: "Friendship Heights has no true national comparable: a small, transit-served district with a strong cluster of medical offices, and no anchor hospital" (see: https://montgomeryplanning.org/wp-content/uploads/2026/07/FHSP_WorkingDraft_PBppt.pdf) Although page 21 of the Draft Plan refers to "a rare medical office cluster" as one of the strengths of the area, there is no discussion of the potential for enhancing and encouraging the

medical community. In fact, the Draft Plan undermines it by identifying a currently occupied medical office building as an "opportunity site" without acknowledging its role in the medical cluster. See page 124 of the Draft Plan, which recommends a significant upzoning of 5550 Friendship Boulevard, the current location of several prominent medical, surgical, and professional offices. In its discussion, the Draft Plan refers to the site as one for "potential redevelopment." There is no mention of its current use, its value as a community resource, or the potential for economic growth in the medical sector. Instead, the Draft Plan recommends increasing the height from 90' to 150' feet, presumably to encourage another multifamily high-rise. A full discussion of whether or to what extent to rezone the site should include a discussion of its potential beyond housing, as well as a description of its current condition and use – a five-story office building first built in 1980 and renovated in 2019 and located in a densely populated area, including the 800+ apartments in the Willoughby of Chevy Chase directly across the street.

Finally, it is unfortunate that the Draft Plan links the loss of retail in Friendship Heights to an aging population and not enough housing. For decades, the apartments for sale and rental in the area have attracted older residents who have retired or want to downsize. In fact, the average age of today's population is approximately the same as it was when the 1998 Sector Plan was adopted. And, as pointed out previously, the density of the area is extreme. What, then, is the likely cause of the loss of retail in the previously "successful mecca for shopping" described on page 3 of the Draft Plan? It is worth considering the effects of the many economic downturns in the 21st century as well as the major economic impacts of the pandemic and online shopping. These dynamics explain what has happened in Friendship Heights and should be part of a discussion intended to address the changes that have occurred.

The departments have provided their best advice on the Draft Plan recommendations in a sincere effort to improve it. I have noticed that many of their comments on previous plans have been dismissed. I hope this time will be different so that this plan better serves its residents and more fully addresses future housing, environmental, economic, and transportation challenges.

Sincerely,

Marc Elrich
County Executive

Marc Elrich
County Executive

Christopher R. Conklin
Director

DEPARTMENT OF TRANSPORTATION

M E M O R A N D U M

August 27, 2026

TO: Greg Ossont, Deputy Director
Department of General Services

FROM: Haley Peckett, Deputy Director for Transportation Policy
Department of Transportation

SUBJECT: Friendship Heights Sector Plan
Public Hearing Draft – Executive Branch Comments

Thank you for the opportunity to review the Public Hearing Draft of the Friendship Heights Sector Plan. In addition to the attached detailed technical comments, we would like to highlight several more significant interests. In the items below, footnotes identify the associated comment number in the attached detailed technical comments.

1) **WISCONSIN BUS LANES:**[16,26] Our detailed comments include refinements to the plan's language on the Wisconsin Avenue Bus Lanes. It may be difficult to justify funding for these bus lanes given the low volume of bus services currently planned for the corridor. However, other treatments – such as queue jumps and transit signal priority – could have more nearer term potential.

   Given the low population densities between Friendship Heights and Bethesda: the most likely path to justifying bus lanes would be if WMATA were to extend some of the bus routes currently operating southward from Friendship Heights, improving the connectivity between Bethesda and Georgetown, or to increase frequency of the D96 route. Wisconsin Avenue NW is also a bus priority corridor for DDOT, and as DDOT invests in the corridor that could also lend support toward additional bus services and investments along the Maryland portion of Wisconsin Avenue.

2) **MODEL ASSUMPTIONS:** We would appreciate additional information on modeling assumptions:
    - Bus lanes are indicated as beginning at Bradley Blvd in Bethesda, leaving a gap between Bradley and the currently planned terminus of the BRT at Elm St.[27]
    - It is unclear what operational characteristics were assumed for bus services.[28]
    - Additional justification is suggested for the presumed reductions in traffic volumes along River Road and Wisconsin Avenue.[29]
    - It is unclear how the Level of Service target was determined.[30]

Attachments: Detailed Comments

cc: Andrew Bossi, MCDOT
Kara Olsen-Salazar, MCDGS
Debbie Spielberg, CEX
Claire Iseli, CEX
Meredith Wellington, CEX

0	Team	Commenter	Document	Page	Summary	Comment
1	Transit	AW	Main Document	13	Syntax	First full paragraph, 3rd sentence: "red line" should be capitalized
2	Policy	ADB	Main Document	20	Syntax	3rd Paragraph, 2nd to last sentence: "Unlike the other downtown..." - Downtown should be plural
3	Policy	ADB	Main Document	73-74	Transpo Analysis	The transportation analysis shows improvements across the board against the currently approved plan. This section would be a good opportunity to give a very brief summary of the results, especially as they appear to support the plan's proposals.
4	Transit	AW	Main Document	73-97	Syntax	The draft alternatively refers to the current bus facility as a "station," "terminal," "facility," and "loop." Recommend using one term consistently, preferably "facility."
5	DO	HP	Main Document	74	Lighting	Since lighting is one of the key pedestrian safety recommendations, suggest providing a map that shows missing or deficient lighting.
6	Policy	HP, ADB	Main Document	75	Ladder Crosswalks	Delete "ladder" from "Recommend the Village of Friendship Heights upgrade brick crosswalks to high-visibility ~~ladder~~ crosswalks…" While our current standards specify ladder crosswalks, area master plans should not get into operational details of specific marking patterns.
7	Policy	HP, ADB	Main Document	75	Protected Crossings	Consider replacing this section with: >>> Protected crossings use design and traffic control devices to provide a safer and more comfortable pedestrian and bicycle crossing. They typically include devices such as a stop sign, beacon or signal, as well as reduced crossing distances, means of slowing vehicular speeds approaching the crossing, and increasing the visibility of those using the crossing. Recommendation: The plan seeks to increase the frequency of protected crossings and locate them where pedestrians and bicyclists naturally choose to cross the street. The intersections proposed for new protected crossings are shown on Map 15 and require further evaluation to determine the most appropriate traffic control. Existing signals should also be reviewed for safety improvements such as pedestrian recall, leading pedestrian intervals, and accessible features. <<< This focuses a definition into the 1st paragraph & then the plan's recommendation into the 2nd paragraph, which appears to be what is intended by the current text. But the current text has some Recommendation elements in the definition paragraph, and the definition itself is not particularly clear.
8	DO	HP	Main Document	78	Bikeways	The opening narrative of the Bicycle Network section should acknowledge that Friendship Heights is a major gap in the regional bikeway network. Both Bethesda and the DC side of FH have robust bike infrastructure leaving through-cyclists with inadequate infrastructure & discouraging biking between these activity centers.
9	Policy	ADB	Main Document	78	Syntax	4th Bullet: Replace "constructing a non-motorized bridge" with "constructing a bridge for non-motorized users" This is to clarify that "motorized" is not referring to the physical design of the bridge itself.
10	Policy	ADB	Main Document	78	Syntax	5th and 6th Bullets: Replace: "dedicate the full master-planned right-of-way to implement separated bike lanes" With: "dedicate the full master-planned right-of-way to support implementation of separated bike lanes" This is to clarify that the entire right-of-way is not intended to exclusively be for separated bike lanes.
11 *	Policy	ADB	Main Document	79	Protected Intersections & Sidepaths	Last bullet: Reiterating the same comment I've been making since 2018: delete "sidepaths" from this list. Sidepaths don't use Protected Intersection designs.

0		Team	Commenter	Document	Page	Summary	Comment
12	*	Policy	ADB	Main Document	80	Trent St - Park Connection	Consider adding a trail connection between the end of Trent St and Willard Avenue Neighborhood Local Park. There might already be a worn path here; I see it extending off of Trent through the public ROW, but cannot discern whether it goes to the house (5001 River) or if it continues to the park.
13		Policy	ADB	Main Document	82	Long-Term Parking Amenities	Last bullet: Are "bicycle repair stations, air pumps, and electric bike charging stations" intended at ALL long-term parking facilities? As phrased, this would include: - Vehicle parking facilities - Bike facilities with long-term bike parking spaces, including within private developments I am neutral on what is intended; it would just be helpful to affirm that what is written is what is intended (or refine language if the above are not intended).
14	*	Policy	SCP / ADB	Main Document	83	Additional Bikeshare	2nd Bullet: Consider adding "additional" so that it reads "Suggested locations for **additional** Capital Bikeshare Stations…" This should reduce confusion with the next bullet, where there is already an existing Bikeshare station. Presumably the bullet "Friendship Heights Metro Station" is intended to imply that the station should be expanded?
15		Policy	HP / ADB	Main Document	83	Sub-Bullet Indenting	The sub-bullets for the suggested Bikeshare stations should be indented one level.
16		**Policy**	**HP, ADB**	**Main Document**	**84**	**Wisconsin Bus Lanes**	**1st Bullet:** **Suggest changing first bullet to "Study bus priority improvements along Wisconsin Avenue between Oliver Street and Western Avenue, to be coordinated with DDOT bus priority projects and circulation into the Metrorail station bus loop."** **While not opposed to bus lanes per say, this area may benefit from queue jumps, TSP, or other improvements that are not necessarily only bus lanes.** **Current and planned bus frequencies do not support bus lanes in this area, including in Metrobus and Ride On 5 year networks. MD 355 South is planned to terminate at Bethesda. There is no planned service provided to use the bus lanes between Bethesda and Friendship Heights or to run through service from DC to Bethesda.** **However, the potential to create efficiencies for DC or MD routes that terminate at FH Metrorail station may alone merit improvements. And if bus routes evolve to connect Georgetown, the Wisconsin Ave corridor, Friendship Heights, and Bethesda this may similarly lend support to additional bus infrastructure.**

0		Team	Commenter	Document	Page	Summary	Comment
17		DO, Transit, Policy	HP, AW, ADB	Main Document	84	Bus Loop	3rd Bullet: Consider replacing all of Bullet 3 with the text below, which intends to better highlight the goals (and add a few more), while also flagging that WMATA might initiate this evaluation prior to the property owner initiating redevelopment of the site. >>>With the future redevelopment of 2 Wisconsin Circle and The Collection, consider abandoning/realigning Wisconsin Circle, and repositioning the Metro station bus facility to improve the user experience and bus operations of the area. Goals of such a repositioned bus facility would include: • Welcoming, visible, and improves the connectivity, accessibility, and ease of navigation for all users. • Provides adequate capacity, maneuverability, and clearance for future bus needs, including layover space. • Provides facilities for micromobility and bus operations, including restrooms and a supervisor booth. • Incorporates active ground floor uses • Improves upon lighting, ventilation, and noise Such an effort must be coordinated with WMATA, MCDOT, and relevant jurisdictional and state authorities. WMATA is encouraged to initiate such an evaluation in advance of redevelopment of the site.<<<
18		DO	HP	Main Document	86	Streets	Bullets 3 and 4 should be indented
19		Policy	HP, ADB	Main Document	86	Ladder Crosswalks	8th Bullet: Delete "ladder" from "high-visibility ~~ladder~~ crosswalks…" While our current standards specify ladder crosswalks, area master plans should not get into operational details of specific marking patterns.
20		Transit	AW	Main Document	88	Envelopes	In the footnote: Change “the envelopes of transit stations” to “the envelopes of transit stations and bus stops.” Additional ROW behind the curb will allow more room for bus shelters and other stop amenities.
21	*	DO, Policy	HP, ADB	Main Document	91-97	Existing Curblines	It would be helpful to note where the existing curbs are for all streets. The Interim condition should reflect not moving curbs (I think it does but hard to tell).
22		Policy	CP	Main Document	92	Wisconsin Bikeway Width	Why does the single block segment between Willard and S Park along Wisconsin show a 12' bike facility when the preceding and following segments show 10'? I would suggest keeping a single dimension for planning, design, and implementation purposes.
23	*	Policy	ADB	Cross-Sections	93-96	Willard & Friendship X-Sctns	What is shown may be a substantial capital project if it is not able to be incorporated into the Friendship Commons (GEICO) project currently seeking approval. If this cannot be incorporated int the Friendship Commons project I think it will be difficult to get momentum to fund this project for a long time. Consider maybe adding a cross-section showing whatever ends up getting approved for Friendship Commons as a sort of "future existing" condition, which might give a better sense of what would need to change to reach the Proposed condition. Also work with Regulatory Review to push Friendship Commons to get as near to the Proposed condition as feasible.
24		DO	HP	Main Document	95	Curbside Uses	Are the cross sections considerate of curbside uses? Can someone investigate how ground-floor retail aligns with the planned two-way cycletrack and if alleys, side streets, or other loading is feasible?
25		Policy	CP	Main Document	96	Street cross sections	A 10' wide parking stall seems large. Is there a reason for this? Consider reallocating some of that space for something else.

0	Team	Commenter	Document	Page	Summary	Comment
26	DO	HP	Appx F - Transportation	3	Extended 355 BRT Test Scenario	Last bullet on the page: While not opposed to bus lanes per say, this area may benefit from queue jumps, TSP, or other improvements that are not necessarily only bus lanes. Current and planned bus frequencies do not support bus lanes in this area, including in Metrobus and Ride On 5 year networks. MD 355 South is planned to terminate at Bethesda. There is no planned service provided to use the bus lanes between Bethesda and Friendship Heights or to run through service from DC to Bethesda. However, the potential to create efficiencies for DC or MD routes that terminate at FH Metrorail station may alone merit improvements. And if bus routes evolve to connect Georgetown, the Wisconsin Ave corridor, Friendship Heights, and Bethesda this may similarly lend support to additional bus infrastructure.
27	Policy	CP	Appx F - Transportation	3	Scenarios	Would like more details on how the BRT Scenario is modeled. Bus lanes starting at Bradley would leave a gap between the current terminus of the 355 South BRT at Elm.
28	DO	HP	Appx F - Transportation	9	Metrics	I assume that the VMT and auto travel time are slightly decreased since there's an assumption that more people take transit (bc of bus lanes?) Interested to know what bus frequency is assumed in the model.
29	DO	HP	Appx F - Transportation	12	Forecast volumes	Why is a reduced volume on River (pretty significant) and Wisconsin (pretty insignificant) assumed? Is this based on volume changes from 2018 to 2024, which may reflect covid changes or something else? Does the forecasted daily volume consider the population changes (2x) that are assumed under land use changes?
30	DO	HP	Appx F - Transportation	13	Table 6	Why is the target LOS E and not D (or something else)? Is "LOS E or better are considered acceptable" part of the NCHPR report? Something else? I would also heavily lean on SHA to comment upon this table. Especially when bus lanes are not justified by existing or planned levels of service, we need to better understand the conclusion of the models.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

Marc Elrich
County Executive

Jennifer Macedonia
Director

MEMORANDUM

August 31, 2026

TO: Kara Olsen Salazar, Planning Specialist
Department of General Services

FROM: Amy Stevens, Chief, Watershed Restoration Division
Department of Environmental Protection AS

SUBJECT: Friendship Heights Sector Plan Update, Public Hearing Draft – Executive Branch Comments

As requested, The Department of Environmental Protection (DEP) has reviewed the Friendship Heights Sector Plan Update, Public Hearing Draft. We greatly appreciate the opportunity to provide comments.

DEP is submitting the following comments and analysis:

Chapter 3 Plan-Wide Recommendations, Section 3.7 Transportation

The right-of-way presents important opportunities for improving environmental conditions within neighborhoods. This is especially true in urban neighborhoods, such as Friendship Heights, where parcels are highly developed and have limited pervious surfaces and little tree canopy. Incorporating environmental functions into the right-of-way, such as expanded tree canopy, pervious surfaces, and stormwater management, can help address these deficiencies. To reinforce the right-of-way as a space for environmental improvement, goals or recommendations under the transportation section should include increasing tree canopy and reducing impervious surfaces. Adequate stormwater management (SWM) should also be a key design consideration. Stormwater management and tree canopy coverage must be integrated into transportation planning and design from the outset, not treated as secondary amenities. Integrating stormwater management and tree canopy coverage into transportation planning improves water quality outcomes by ensuring runoff is captured, treated, and infiltrated rather than discharged untreated into the storm drain system.

Specific Recommendations for Streets Sections

- On the south and east side of Hubert Humphrey Park along S Park Ave and Friendship Blvd, parking is not permitted adjacent to the park. The roadway is overly large for a single lane of travel, resulting in unused paved surfaces. If parking is not desired along these frontages, this space could be converted to pervious surfaces and include tree plantings, stormwater management, and/or other green spaces. If temporary parking access is necessary for maintenance or other vehicles, strategically placed bump-outs could balance the need for access with the opportunity to increase green space.
- The cross section of Hills Plaza between S Park Ave and Willard Ave is overly wide, including areas where parking is not allowed and areas with wide sidewalks which may provide opportunities to retrofit with pervious surfaces that include tree planting, stormwater management, and/or other green spaces.
- Other areas in the plan area with wide streets or sidewalks should be targeted for conversion into tree planting, stormwater management, and/or other green space.

- As the plan notes in Section 3.8, Friendship Heights has little to no stormwater management. Replacing unused pavement with pervious areas, stormwater management and trees reduces runoff volume and improves filtration, helping remove sediments, nutrients, and other pollutants from stormwater before it enters local waterways. Using this strategy would help achieve the environmental goals of the plan, and ensure the County meets its obligations in the Municipal Separate Storm Sewer permit and Total Maximum Daily Loads to reduce pollutants and install stormwater management in areas that are untreated or undertreated.

Pedestrian Network
Increasing tree canopy for shade, air quality improvement, and rainfall interception should be included as a quality of life, pedestrian comfort recommendation, like lighting. Tree canopy also intercepts rainfall, reducing the volume and velocity of runoff, and improves water quality by capturing particulate matter and facilitating infiltration.

Street Sections
The proposed cross sections show wide medians for Wisconsin Ave. These medians should include canopy shade trees. Median trees can capture rainfall, reduce runoff, and filter pollutants, contributing to better water quality.
If underground Metro and/or utilities prevent street tree planting in the median, it should be stated as a reason why trees are not depicted in the median.

Chapter 3 Plan-Wide Recommendations, Section 3.8 Environment

As the plan notes, between 2009 and 2023 the sector plan area lost about four acres or 6% of its tree canopy. This occurred even though there were no new major developments in the area during that time. This was also during a period of modern tree and forest protection laws, and expectations that tree canopy would increase through redevelopment. It does not appear that these laws are sufficient to maintain, much less increase, tree canopy in the planning area. To reverse the trend in tree canopy loss noted in the plan, stronger, more specific strategies in the plan are necessary.

Nature Based Design Solution:

- The Nature-Based Design Solution of 35% green cover for new construction and private property should be strengthened to include this same requirement for public properties. As written, the plan is unclear how this approach would be applied to public property, creating an inconsistency in application.
- Additionally, the Sector Plan recommendation uses differing language for new construction versus private property. New construction requires 35% green cover, while the private property recommendation specifies that green cover must be "on or over impervious surfaces." For consistency and to achieve the stated environmental goal, the "on or over impervious surfaces" requirement should be required for new development.
- Because the 35% green cover requirement can be met through green cover installed on or above impervious surfaces, it may also be beneficial to establish a minimum pervious area for each development parcel. This would ensure that the environmental goals of infiltration, water quality improvement and urban heat-island mitigation are meaningfully supported across all properties.
- Providing at least 6 inches depth for vegetative cover or landscaped areas is beneficial, however, 6 inches does not allow for tree planting, especially not for large canopy trees. At least some of the green cover requirements should provide soil volume sufficient for supporting canopy trees.
- It may be useful to separate tree canopy and green cover as recommendations. As it is currently worded, a site could have 0% tree canopy by providing other forms of green cover. This could make it very difficult to preserve and enhance tree canopy in the plan area. Tree canopy can provide much greater environmental and social benefits than other forms of green cover. A minimum tree canopy requirement should be set for new construction and private property, to which fee-in-lieu cannot apply. The lack of space available in the sector plan area would make it extremely difficult to use fees to plant trees elsewhere nearby.

Stormwater Management

- DEP does not agree with the recommendations in the Sector Plan about "designing stormwater facilities that are separate from street tree panels to avoid having to remove trees during routine stormwater facility maintenance."

Trees can be a successful component of stormwater management practices. DEP does not remove trees or require trees to be removed from stormwater management practices during routine maintenance. If a tree must be removed, it happens only when the tree dies, become severely diseased or damaged, or if their root system compromises the underdrain of the stormwater management practice. Careful selection of tree species is key. DEP recommends using small-scale, understory native trees, such as *Amelanchier spp*., *Cercis canadensis, Magnolia virginiana* or *Nyssa sylvatica*, especially in highly urban areas with restricted planting zones which can limit root growth and may cause potential instability in larger or taller tree species. Smaller tree species are also easier to remove and replace in the event of serious disease, damage or death.

Chapter 4: Site Specific Recommendations, Section 4.4 Former GEICO Site

The former GEICO site is a unique opportunity in the sector plan area to ensure environmental improvements and existing tree canopy preservation. While it provides significant opportunity for redevelopment, it must also accommodate adequate stormwater management, meaningful green space, and sufficient tree canopy. These elements must be incorporated to the maximum extent possible during redevelopment and preservation of existing tree canopy must be a priority.

Although there are canopy trees along Willard Ave frontage, this area may also be an area that is best suited for development. Figure 26 shows open space between the site and the adjacent residential neighborhood, which appears to be the most suitable area for preserving canopy trees, including native species that are difficult to replace, such as black walnut. Despite this, the Sector Plans recommendation does not explicitly address tree preservation at the GEICO site.

The EYA preliminary plan generally aligns with the sector plan, however, the proposed linear open space (part of the pedestrian network) adjacent to the residential neighborhood appears to be a design that will result in significant disturbance and would allow for little or no preservation of existing tree canopy. As proposed, the site design would eliminate most or all existing trees from the site, which conflicts with the Sector Plan's environmental goals for tree canopy coverage. As noted in Chapter 3, Section 3.8 notes, over 4 acres (or 6%) of tree canopy has already been lost in the area. Replacement trees would require decades to restore comparable canopy, and given typical develop-related disturbance and planting practices, full canopy recovery is unlikely.

For these reasons, tree canopy preservation must be a specific recommendation or requirement for this site.

Flood Resiliency

While DEP supports the Sector Plan's recommendations in Chapter 3, Section 3.8 regarding nature-based solutions and tree protection, it is important to note that these practices have little to no impact on flooding. Nature-based solutions are valuable for improving water quality, reducing stormwater runoff, mitigating heat-island effects, increasing carbon sequestration, providing shade and cooling, reducing greenhouse gas emissions, and enhancing human well-being. However, they do not meaningfully address flood risk.

Flooding is becoming an increasingly significant concern throughout the County. Flood-risk modeling for the Little Falls Branch watershed is currently underway, and as this work progresses, future iterations of the plan should, where appropriate, integrate the results of the modeling by identifying areas with elevated flood risk and suggesting steps to reduce that risk.

DEPARTMENT OF POLICE

Marc Elrich
County Executive

Marc R. Yamada
Chief of Police

August 21, 2026

MEMORANDUM

TO: Kara Olsen Salazar, Planning Specialist
Department of General Services

FROM: Captain Eric M. Stancliff, Director
Policy and Planning Division

SUBJECT: Friendship Heights Sector Plan
MCPD Agency Comments

The plan's projected increase in the residential population could have several policing impacts. As mixed-use corridors expand and multifamily housing continues to grow, calls for service will likely rise, particularly those involving disturbances, suspicious persons, noise complaints, domestic incidents, mental-health-related situations, and landlord–tenant conflicts. Friendship Heights' already sizable senior population—paired with the plan's focus on helping residents age in place—could further increase requests for welfare checks, medical assists, and missing or endangered adults. Additionally, newly planned plazas, parks, and recreation spaces will attract more public activity, potentially leading to increased disorderly conduct, petty theft, event-related needs, and quality-of-life complaints that require officer presence. Increased density through mid-rise and high-rise developments will increase service demands for building facilities, parking garages, shared amenities, and mixed-use retail entrances. Overall, these combined impacts likely represent a moderate increase in policing needs.

The plan's significant reallocation of roadway space also carries important implications for police operations. The reduction of travel lanes along Wisconsin Avenue, the repurposing of River Road for separated bicycle lanes, traffic calming across neighborhood streets, and the installation of protected intersections and pedestrian hybrid beacons could generate short-term traffic complaints as drivers

adjust to new patterns. Officers will need to provide more enforcement and public education related to these changes and additions to roadway geography. Lane reductions and separate bikeways may also introduce navigation challenges for emergency vehicles. These anticipated impacts range from moderate to significant, especially during construction phases and transition years, but should stabilize once the transportation network is fully established.

To address population growth effectively, the department will need to adjust patrol deployment by redirecting officers to areas with higher call volumes, based on crime data and analysis. Community engagement will also be essential to building strong relationships with new communities and to partner effectively with them to address community concerns.

However, all these efforts could be significantly affected by the department's current staffing crisis, which is projected to worsen over the next several years. The MCPD is currently operating with approximately 182 fewer officers than authorized, and hiring remains stagnant. Based on current recruitment and retention trends, the department is likely to hire and retain approximately 45 officers per year. This challenge is compounded by the large number of officers scheduled to leave through the Deferred Retirement Plan (DROP) in 2028 and 2029—estimated between 75 and 100—which will create additional vacancies. As a result, implementing enhanced patrol coverage, expanding community-policing initiatives, and preparing for increased service demands may become increasingly difficult.

cc: Chief Marc R Yamada
Assistant Chief Nicholas R. Augustine