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JULIAN P. MANSFIELD, *Village Manager*

VILLAGE OF FRIENDSHIP HEIGHTS
4433 SOUTH PARK AVENUE
CHEVY CHASE, MARYLAND 20815
Phone: 301-656-2797
Fax: 301-907-3922
Email: info@friendshipheightsmd.gov
Website: www.friendshipheightsmd.gov

September 9, 2026

(via email: MCP-Chair@mncppc-mc.org)
Artie L. Harris, Chair and Members of
The Maryland-National Park and Planning Commission
2425 Reedie Drive - 14th Floor
Wheaton, Maryland 20902

Re: Working Draft, 2026 Friendship Heights Sector Plan

Dear Chair Harris and Members of the Board:

The Village of Friendship Heights herewith submits to the Montgomery County Planning Board this Report on the 2026 Working Draft of the Friendship Heights Sector Plan. This Report complements and expands upon the oral testimony of Francine Klein, Esq., the Vice Chair of the Village Council, to be delivered at the Board hearing on September 14, 2026.

The focus of this Report is on the Working Draft itself. To the extent warranted, the Report reiterates issues and concerns previously presented to staff in meetings and in detailed correspondence. Appendix B, a generalized summary of staff's community engagement process, does not include either the Village's written materials sent to staff or summaries of its meetings with Village officials. As a result, in order for the Board to have a complete picture of the Village's concerns about the Working Draft, the Village has found it necessary, in lieu of reference to Appendix B, to reiterate in this Report all of the issues and concerns it previously expressed to staff.

Sincerely yours,

Francine K Klein

Francine K. Klein
Acting Chair, Village of Friendship Heights Council

Cc: Roy Schaeffer

Enclosure: Village Report

VILLAGE OF FRIENDSHIP HEIGHTS

REPORT ON THE PLANNING BOARD STAFF
2026 WORKING DRAFT
FRIENDSHIP HEIGHTS SECTOR PLAN

INTRODUCTION AND SUMMARY

The Village of Friendship Heights submits to the Montgomery County Planning Board this Report on the 2026 Working Draft of the Friendship Heights Sector Plan. This Report complements and expands upon the oral testimony of Francine Klein, Esq., the Vice Chair of the Village Council at the Board hearing on September 14, 2026. While the Village has previously provided staff with commentary in the course of its preparation of the Working Draft, the focus of this Report is on the Draft itself. To the extent warranted, the Report reiterates issues and concerns previously discussed with staff. The Board can be confident it will not be necessary to refer to earlier staff submissions in order to have a complete picture of the Village's continuing concerns about the update of the 1998 Friendship Heights Sector Plan; they are expressed again in this Report. The Report reviews the Working Draft primarily in the order of its pagination.

The Village's overall appraisal of the Working Draft begins by noting that we were hoping for a document as highly satisfactory as the one it is proposed to replace—the 1998 Sector Plan. That hope has not been realized as yet, and the goal of this Report is to help bring the Working Draft up to that level of accomplishment. The shortcomings in the Working Draft are discussed in detail in this Report, but first we summarize some of the major areas of disappointment.

Process: The Working Draft cannot be faulted for lack of outreach to the affected community. Appendix B makes abundantly clear that the staff did an exemplary job of soliciting input from stakeholders in Friendship Heights. Missing from this process, however, is a key ingredient in the success of its predecessor—re-establishment of the Friendship Heights Sector Plan Citizens Advisory Committee, whose names are prominently listed on page vii of the 1998 Sector Plan. The

Committee consisted of eleven community resident representatives, including ones for the Village of Friendship Heights, Chevy Chase Village and the Town of Somerset, and five corporate or developer representatives. This Committee did not merely provide input to the staff; the Committee met on many an occasion to **collaborate**, with a view toward providing a **consensus** set of recommendations for use in the drafting of the sector plan. This consensus-driven process yielded an update of the 1974 Sector Plan that, while not entirely free of controversy, has stood the test of time. The current process, by contrast, while informed by stakeholder input, is not informed by any consensus-derived input. The Working Draft is an entirely "top down" end product reflecting the staff's exclusive judgment of what its contents are. It should come as no surprise to the Board, therefore, that there would be a number of stakeholders who feel that the Working Draft has not adequately addressed their concerns. The Village is one such stakeholder.

Friendship Heights Village: The Village of Friendship Heights, which has a strong sense of community, is one of the most affordable places to live in southwest Montgomery County. Market-rate rentals in Village high-rises (both in its rental buildings and condominiums) are significantly lower than in the nearby new Residences at Mazza, where 1 bedroom/1bath units start at $2171 without utilities, a figure that is 149% of the 2016 maximum Moderately Priced Dwelling Unit (MPDU) in Montgomery County. In the Village, by contrast, the market-rate for 1bedroom/1 bath units are not just lower; they approach the MPDU maximum: 101% (of $1820) for 4615 North Park Avenue ($1837); 105% for the Highlands ($1905); and 113% for Willard Towers ($2062). All of these buildings have updated amenities, including pools and fitness facilities.

Additionally, the Village's four condominiums, the Willoughby, the Carleton, the Elizabeth and 4620 (all of which have pools and fitness facilities), have spent millions of dollars in recent years to upgrade their buildings with regard to energy efficiency, infrastructure integrity and décor. Currently at the Willoughby, there is a studio on the market for $165,000, a 1 bedroom/1 bath unit for $273,594, a 2 bedroom/2 bath unit for $437,574 and a 3 bedroom/2bathroom unit for $535,000--all priced well below what can be expected from any new development on the GEICO property.

As the 1998 Sector Plan stated, the intersection of Wisconsin and Western Avenues, where the Metro station is located, is the logical center of the Sector Plan area, but the bulk of the density and height is a few blocks away from Metro, in the Village of Friendship Heights. The high-rise apartment buildings constructed in the Village have minimal setbacks from adjoining structures, high land use densities and

few visible exterior amenities. Today, such structures would be required to provide extensive open spaces and public amenities to offset the density.

In fact, the Village of Friendship Heights has the highest population density of any census-designated place in the United States. Sitting on about 37 acres—less than one-tenth of a square mile—the concentration of high-density residential buildings within a very small land area accounts for its exceptionally high density. Plans by a local developer for another new high-rise residential building at South Park and Wisconsin Avenue will add to the residential density.

Moreover, approximately 35% of the Village residents are 65 years or older. Because of its high proportion of older adults living in a neighborhood that was not originally designed for seniors, the Village is considered a Naturally Occurring Retirement Community or NORC. In September 2018, the *Washington Post* reported that residents of the Friendship Heights area have a life expectancy of approximately 96.1 years, significantly longer than the national average. At the same time on every school day, hundreds of children under the age of 18 living in the Village are bused to Montgomery County Public Schools.

Created as a taxing district by the State in 1914, the Village is managed by an elected Council of seven members who work together and with a General Manager to foster a sense of community. A Village Center and adjacent park provide a welcoming environment where residents socialize at a wide variety of special events, including activities for children. The Village provides hundreds of hours of educational and recreational programming for residents and anyone else who wishes to participate. A free shuttle service to the transit hub, supermarkets, shopping centers, and other local venues is provided on a regular schedule seven days a week.

Because of the Village's density of development, demographics, and focus on resident services, the Village Council believes it is critically important to emphasize "preservation" within Village boundaries as it plans for the future. As noted in a letter from Mayor Roy Schaeffer to the Planning Board on October 14, 2025, the Village is already struggling with a scarcity of green, open space relative to its population and high levels of traffic and pedestrian safety concerns. The Council considers it essential to preserve green, open space within Village boundaries on Parcel 4 ("5550 Friendship Boulevard" in the Working Draft and Parcel 6 (now called the "Shoemaker Block Parcels"). With regard to traffic and pedestrian safety, a Village contractor recently finished a study of Village intersections, and the Council will be authorizing recommended improvements to enhance cross-walk safety.

The Village is a significant part of the economic engine of Friendship Heights. Within the Village boundaries, along Wisconsin and Willard Avenues, there are hi-rise office buildings, with many medical providers, a variety of retail stores, restaurants, banks, a post office and a Courtyard Marriott. Along Friendship Boulevard on Parcel 4, there is a medical office building that attracts patients from around the Metropolitan area and an assisted living facility. At ground level on North Park Avenue, the medical office building houses three commercial establishments: a food/wine market, an auctioneer, and a popular karate school. At 4601 North Park Avenue, an Arcade, which opens to the street, houses seven commercial establishments: a childcare development center, deli, dentist, pediatrician, physical therapist, hair salon and dive school.

The Shoemaker Parcels include a number of commercial enterprises at 4600 North Park Avenue, a 3-story structure of office condominiums built in 1989 with an underground parking garage. Current businesses in 4600 North Park Avenue include: Chevy Chase Foot & Ankle; Eye Rx Chevy Chase; Law Offices of Jeffrey W. Harab; SmithLife Homecare; Soapbox Consulting; Titan Title; and RLAH@properties. Additionally, the Village owns two properties in the Shoemaker Parcels: 4602 and 4608 North Park Avenue. Previously an office building for attorneys, 4602 North Park Avenue is being rented by the Village to local artists as a workspace and also serves as a Field Office for the Montgomery County Police Department. The Pyles House at 4608 North Park, constructed in 1906, is the oldest surviving structure in Friendship Heights. The Village (which sold all its air rights to the developer of the property at South Park and Wisconsin) has renovated the property to ensure compliance with ADA requirements. Additional renovations are now underway by future tenants who intend to operate a café there.

Uniqueness of Planning in the Village: In the 1998 Sector Plan (except for two high-rises just north of the Village in Somerset, the Village, a self-governed entity entirely within the Plan Area, was the sole contributor of resident owners and renters in Friendship Heights. In the Working Draft, Brookdale north of River Road has been added, but the issues and concerns of its single-family home residents differ materially from those who reside in the Village, which remains the dominant Friendship Heights stakeholder in relation to residents of high-rise apartment buildings in the enlarged Plan Area. Nevertheless, as detailed in this Report, the Working Draft regularly fails to come to grips with the Village's unique status, interests and concerns as the Village has to date dealt successfully with the ongoing challenge of future growth while being the most densely populated area in the County and foremost so in the Nation.

Housing: The most significant way in which the Working Draft fails to differentiate the Village from the rest of Friendship Heights is on the subject of housing. This Report discusses exactly how and why the Village is not a good candidate for being a significant contributor to the Plan-wide goal of increasing housing in Friendship Heights generally.

Village "Opportunity Sites": Two of the four "opportunity sites" in the Working Draft—5550 Friendship Boulevard and Shoemaker Block Parcels—are in the Village. Undisclosed in the Working Draft is that both of these locations were also identified and discussed in the 1998 Sector Plan as potential redevelopment parcels, but not with the pro-development slant of the phrase "opportunity parcels."

The Village's objection to this phrase is grounded in the fact that the Working Draft envisions far more development "opportunity" for these sites than the Village believes is warranted, as detailed in this Report, and more than was recommended in the 1998 Sector Plan, which was far more definitive regarding preservation of critical open space around the densest area of County development. Here, too, the Village's dissatisfaction with the Working Draft can be directly traced to the lack of staff recognition that the Village is not an appropriate location within Friendship Heights for any significant infusion of additional residential units.

We ask that the Sector Plan Update clearly state that the Village is much more densely populated than the surrounding areas in Friendship Heights and acknowledge the need to "preserve" existing green, open space and smaller structures within Village boundaries. As the 1998 Plan recommended, it is important to preserve views from existing high-rise apartment buildings by incorporating guidelines for the height and location of new development, by tree preservation and planting, and by adding new open spaces.

Shoemaker Parcels (Parcel 6)

Parcel 6 is located between North Park Avenue and Willard Avenue in the surrounded by the four Village condominiums. It slopes down steeply from North Park Avenue to Willard Avenue and contains small-scale structures and mature trees. As none of the buildings on Parcel 6 exceed 40 feet, Parcel 6 permits an enormous amount of sunlight to reach North Park Avenue (which is less than a third of a mile long and fairly narrow) and provides visual relief (in structure and green space) from the high buildings that surround it.

Were high or mid-rise buildings to be constructed on Parcel 6, North Park Avenue would become a shadowed canyon for its many pedestrians and residents. The Village is very aware that residents who live in condos and apartments facing Parcel 6 selected their dwelling units on account of the sunlight and green space

made possible by its low-scale development. Both their property and quality of life would be diminished if the Sector Plan conclusions relied upon over the past 50 years were to be abandoned. This is especially concerning as the bases for the conclusions in the previous Sector Plans have not changed: the need for green space, visual relief, and light.

Recognizing the importance of Parcel 6 in maintaining a necessary balance in diversity of massing, placement, and height, the 1998 Sector Plan sets forth two Objectives for Parcel 6: to create a neighborhood park and to preserve as much as possible the small-scale character of existing structures. Given the existing Village topography, the 1998 Sector Plan objectives should be retained.

Village residents strongly agree. On June 30, 2026, Acting Village Council Chair Francine Klein sent the Board a Petition and signatures from 596 Village residents opposing the construction of any mid-rise or high-rise building on the Shoemaker Parcels. At the same time, the Village welcomes new development on the site. As Mayor Roy Schaeffer noted in a letter to the Planning Board staff on December 8, 2025, the Shoemaker Parcels are an ideal location for missing middle affordable duplexes, triplexes, townhouses, and modest apartment buildings that fit within a low-scale framework.

5550 Friendship Boulevard (Parcel 4)

On the comer of Friendship Boulevard and North Park Avenue, Parcel 4 contains a five-story medical office building with approximately 132,000 square feet of total development, including a sixth office floor below grade. The office building is located at the extreme western side of the site, leaving a driveway entrance, an entrance to underground parking and a large open green area on the eastern side. The large area of grass is the only space of its kind in the Village. It is used by running children, Frisbee throwers, and dog walkers, among others.

The Parcel is surrounded on the west by the Elizabeth condominium (which is very close); on the east by an assisted living complex and the Village Center (both low-scale structures); on the south by the Willoughby and the Carleton; and on the north by Somerset House. Because Friendship Boulevard ends before Somerset Terrace, a private road, the congestion that would occur on Friendship Boulevard in connection with large-scale redevelopment of Parcel 4 needs to be avoided.

As noted in the 1998 Sector Plan, any redevelopment should remain mid-rise, minimize impacts on the assisted living facility and the Village Center, provide adequate setbacks from the Elizabeth and adjoining residential structures, and preserve major portions of the property as a highly visible "green open space" for public use and enjoyment in order to offset surrounding high densities.

Travel Lane Reductions: In reviewing the Working Draft, the Village was quite unnerved to discover that it proposes that of the 26 motor vehicle travel lanes on major roads into, out of or through Friendship Heights, 13 (i.e., 50% of them) are proposed to be eliminated or repurposed to other uses, such as bicycle lanes. These planned closures are detailed in this Report. The closures take on added importance in that the targeted roads are already heavily traveled, and the conversions would do little or nothing to enhance bicycle safety or relive bicycle congestion, which is all but non-existent as a travel mode to or from Friendship Heights.

As noted in the 1998 Sector Plan, Friendship Heights functions with a high level of Metrorail ridership, but without a grid system for traffic circulation, and with complex transit needs and movements at the Metro station located on the District of Columbia boundary at the center of the Central Business District (CBD).

Wisconsin Avenue, which traverses Friendship Heights, is a six-lane, north-south, major State highway that provides good vehicular access to the local street network within the CBD, while carrying a significant volume of regional traffic through the area each day.

Western Avenue, an east-west, four-lane road, forms the southern border of the CBD. Its intersection with Wisconsin Avenue, including the adjacent Friendship Heights Metro station, is the focal point of the transportation system serving this area.

River Road, a four-lane major State highway just to the west of the Sector Plan area, passes through residential areas from beyond the Capital Beltway to near Tenley Circle in the District of Columbia. It carries significant through traffic and some local traffic to and from Friendship Heights via its intersections with Willard Avenue and Western Avenue. In turn, Willard Avenue, Friendship Boulevard, and Wisconsin Circle also provide important local access within the CBD.

In short, Friendship Heights is the bottom of a commuting funnel upon which the County heavily relies. With the crush of new residents planned for Friendship Heights and hopes for a revitalized shopping experience along Wisconsin Avenue, it makes absolutely no sense to handicap the community by jettisoning critically important traffic lanes.

Tree Canopy: The Working Draft rightly places considerable emphasis on preservation of Friendship Village's existing tree canopy, which at present consists primarily of mature shade trees. Hence the Draft proclaims as an environmental goal minimizing tree removal and maximizing tree protection. But over the objections and protests of hundreds of residents, the Board only recently approved the removal of most of the mature shade trees on the GEICO property—trees which have been

producing cooling shade for decades and reducing the urban heat island effect found elsewhere in Friendship Heights. The words in the Working Draft are in conflict with the Board's actions.

The trees on the GEICO site represent Canopy Coverage of approximately 20,166 feet applying United States Department of Agriculture crown width factors to diameter at breast height (measured in the U.S. at 4.5 feet above the ground). Testimony at the GEICO hearing stated that 190 of 203 significant trees (or 94%) have been approved for removal. This also would mean removal of 93% of the canopy (18,715 of 20,186 feet), in an urban neighborhood that is already a known heat island. In Maryland, anything more than 85% forest removal is tantamount to Clear Cutting.

In light of the principals espoused by the Board on Tree Canopy Preservation, the Board should reconsider its decision to narrow the Greenway on the GEICO site and revise the working draft Sector Plan to expressly recognize that existing shade trees and new housing in tree-shaded areas are not in zero-sum conflict. Rather trees and new houses can exist together, complementing each other and increasing the desirability and value of new development in those areas—a far better solution than clear cutting the trees and replacing them with saplings that will take decades of growth to provide the shade being lost.

CHAPTERS 1 AND 2: PLAN VISION & BACKGROUND AND CONTEXT

1.1 EXECUTIVE SUMMARY

The Executive Summary, like the rest of the Working Draft, makes no material distinction between the Village of Friendship Heights and the rest of the Plan Area in making its recommendations. This is a major failing that impairs the credibility of many recommendations in the Working Draft. Unlike anywhere else in Friendship Heights, the Village is a self-governing special taxing district with an elected seven-member Council, a Mayor and a General Manager. It is far more densely populated than Friendship Heights generally, and this disparity is even more pronounced in relation to both the larger Bethesda-Chevy Chase Plan Area of which it is a part, and the County as well. In fact, as noted above, it is among the most densely populated census tracts in the Nation.

This exceptional density, going back to the 1970's, has resulted in a 1998 Sector Plan that has ever since limited new development in the Village to low and medium rise buildings along with the preservation of remaining open space. Over the same time period, the current reality is that elsewhere in Friendship Heights, it is a significantly different locale today than it was in 1998. This was acknowledged

by staff in the February 2025 Scope of Work the Board approved for the Sector Plan Update project. The Scoping document noted that Friendship Heights, within the early years of the 1998 Sector Plan, "had established itself as a successful urban center with a mix of residential, retail and office uses." But it went on to note that "recent years have seen rising office and retail vacancies," and "limited new development in the past 20 years," with the result that the population of Friendship Heights "has remained relatively static."

In fact, well before the Scoping document was presented to the Board, the cachet of Friendship Heights as "the region's premier high-end retail shopping district," Working Draft (p. 12), filled with high-end retail stores such as Neiman-Marcus (across Western Avenue in the District), Saks Fifth Avenue and Lord & Taylor, had all but vanished. This occurred along with a sea change in consumer reliance on patronizing the kind of brick-and-mortar retail stores that had contributed to making the Village "one of the most densely populated areas . . . in the United States." Working Draft (p. 15 n.2). These changes to Friendship Heights almost certainly contributed to GEICO's recent decision to change its plan to rebuild its headquarters in Friendship Heights, an integral feature of the 1998 Sector Plan, but instead to relocate its headquarters to Bethesda. That transition that is now complete except for finalizing what will replace GEICO on its 26.5-acre property in Friendship Heights. In addition, changing tastes and habits have further undermined any revival of the reputation of Friendship Heights as a "destination" for those residing elsewhere: the growth on online shopping (including ordering of meals for home delivery), competing regional shopping areas, and individual and employer approved work-from-home policies, among other trends.

1.2 PLAN VISION and 3.2 HOUSING

These two sections of the Working Draft, many pages apart, are so significantly interrelated that they must be discussed together. The Plan Vision is to "transform this urban neighborhood into a thriving regional destination" with "expanded housing options' for "new residents" and "strengthening this area and making it a regional destination," including "connections to the surrounding neighborhoods" that are "intended to provide access to and through the Plan Area from the surrounding region." The Vision closely resembles the wording of the Plan Vision in the 1998 Sector Plan (at page xv) that it is updating.

Despite the long, steady downward trend in the economic and demographic significance of Friendship Heights, the Working Draft (p. 14) resolutely assures the

Board that "Friendship Heights is well positioned for the next phase of continued growth and development." The expectation of "continued growth and development," however, is not backed up by the demographic information set forth in the Working Draft (p. 15):

> In 2023, the Plan Area had 6,065 residents, a 2% increase from the population in 2000. This growth was much slower than Montgomery County's overall population growth of 21% for the same period.

In other words, the demographic data for the past 20 years show population growth in the County at more than **ten times** the rate in Friendship Heights.

If there is reason to conclude that this disparity in growth will completely or even significantly erode over the Plan Period, evidence of it is nowhere to be found in the Working Draft. Instead, the Working Draft projects that over the next 25 years, Friendship Heights, whose area is only a tiny fraction of the Bethesda-Chevy Chase Planning Area,[1] should be redeveloped to absorb 4,700 new residential units. This includes the Wisconsin Place and Somerset apartments just outside the Village. This number is just under **45%** of the 10,500 units that is the local housing target for Bethesda-Chevy Chase for 2050, as established by the Board jointly with the Council's Planning, Housing and Parks Committee. Working Draft (p. 45). Further, the 1998 Sector Plan (pp. 5,8) reported that the Village had 3,435 dwelling units and a population of 4,730 in the 1990 Census. In the Working Draft (p. 47) the current unit number for the Plan Area is "nearly 4,000" and the population 6,065 (Id., p.15). An increase of 4,700 units by 2050 would more than double the unit count (and the population) of the Plan Area, or a **117.5%** growth, compared to **2%** over the past 20-25 years.

The Village is filled with residents who are in many instances retired professionals whose experience and knowledge has led them to fully recognize the need for an expanded effort at the creation of additional housing in the County. But Friendship Heights development history over the past 60 years demonstrates that the Village is not a viable candidate for much of that growth, and certainly not for almost half the growth targeted for the Planning Area and a monumental increase in its

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[1] The Village does not have comparative land area numbers, but Map 4 in the Working Draft shows the entire Planning Area and the four Sector Plans within it. The smallest, Friendship Heights, is minuscule in area in comparison to the entire Planning Area.

already dense population. To project otherwise is not just poor planning; it is an absurd rejection of the economic and practical reality facing Friendship Heights.

In meetings and correspondence with the Working Draft staff over the past year, the Village has explained to staff why it cannot be considered a likely target for population growth and new development, apart from the fact that the Village's density is nowhere exceeded in the County. Those discussions have not simply gone unappreciated in the Working Draft; the opposite of this reality has been presented as fact. Without differentiating the Village from the rest of Friendship Heights, the Working Draft states that "Friendship Heights needs additional housing to meet the evolving needs of current residents and to attract new households." *Id.,* p. 44. Simply put, this statement has no applicability to the Village. Table 2, p. 44, lists the eight apartment buildings in the Village, all built between 1962-1975, with the exception of The Carleton, built in 1982. There are 4 condo and 4 rental buildings, with a combined unit total of 3137 units nearly evenly divided between condo and rental units. Despite their age, they are not in disrepair or sliding into obsolescence. The condos have cash reserves being regularly utilized to maintain a high-level of maintenance with millions spent to keep their infrastructure up to date and energy efficient. Nevertheless, units in these buildings typically do not command the luxury prices of new construction. The undifferentiated Working Draft claim that market-rate rental units in Friendship Heights are not affordable, *id.*, (p. 47), has not been shown to be true of Village rentals.

This differing treatment is quite evident in the Working Draft (p.22) which envisions future multi-family development in Friendship Heights to emulate the new Residences at Mazza (across Western Avenue in the District), which includes "a modern mix of [unit sizes] for rent," that "generates economic viability for ground floor retail spaces that activate sidewalks and provide amenities." In contrast, the Village multi-family buildings are all but dismissed as "1960s vintage complexes." The Village high-rises may be "vintage," and not as ground-floor engaging as new buildings might be, but they nevertheless relieve pressure on the demand for affordable housing in the County, an economic reality for the Village that goes unmentioned and unappreciated in the Working Draft.

Market-rate rentals in Village high-rises are significantly lower than in the nearby and much newer Residences at Mazza, where 1 bedroom/1 bath units start at $2711 without utilities, which is 149% of the 2026 maximum MPDU rent for 2026, according to the DHCA Worksheet for calculating maximum MPDU rental rates

($1820 for this size unit). In the Village, by contrast, the market-rate for 1bedroom/1 bath units are not just lower; they approach the MPDU maximum: 101% (of $1820) for 4615 North Park Avenue ($1837); 105% for the Highlands ($1905); and 113% for Willard Towers ($2062). The numbers unmistakably reveal the Village as a premier location to find "market-rate affordable" high-rise living.[2]

Thus, while the Village firmly rejects the notion that it can and should be obliged to absorb most of the 4,700 new dwelling units projected for Friendship Heights over the life of the Plan, its doors remain wide open to families looking for an urban lifestyle that is both affordable, and more affordable than can be found in the newer high-rise apartment buildings elsewhere in the Bethesda-Chevy Chase Plan Area that cater to high income families while adding a few affordable units in the balance. The Village does not need or seek any significant demographic change or new housing in pursuit of the goal of ample affordable housing. The Village wants a Sector Plan that will promote and further facilitate affordable living and the quality of life it has already achieved and that continues "to attract new households." *Id.*, (p. 44).

CHAPTER 3 PLAN-WIDE RECOMMENDATIONS

3.1 LAND USE AND ZONING

All of the proposed rezoning goals and recommendations should be reconsidered in light of the flawed Vision that unrealistically imagines a more than doubling of the residential density over the life of the updated Sector Plan and fails

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[2] The demographic data in the Working Draft Appendix B support this conclusion. The 2023 Demographic Profile of the Plan Area (whose reliability is reported as "good"), states that of the Area's 2057 rental units, 90.5% (or 1862 units) are in buildings with more than 20 units. The 2057 number aligns fairly closely with Table 2 of the Working Draft, which reports 1966 rental units, of which 1534 are in the Village's high-rises. Working Draft (p.44). The Appendix B demographic data also discloses that 733 households (or 36.2%) of rented units in the Plan Area are paying more than 30% of household income on rent. In other words, nearly two-thirds of the rental units in the Village, none of which are subsidized through the MPDU program, have rents within the 30% target of what is conventionally considered affordable.

to appreciate the distinctiveness of the Village. In that re-evaluation, the Village makes note of the following added concerns:

Goals

Apart from the now unplanned parcels on the GEICO property that were designated in the 1998 Sector Plan for relocation of GEICO headquarters, there is no "opportunity site" for a significant increase in residential density in the Village. No high-rise candidates for demolition over the coming decades have been or can be identified in the Village, and increasing existing Village building heights to add density is not economically feasible and certainly would not lead to more affordable housing.

Recommendations:

First bullet: Some of the rezoning recommendations do not merit change on the grounds of asserted need for added "flexibility" to accommodate future development. Even if a 150' height limit could be justified along Wisconsin Avenue, Blocks 11 and 13 (both in the Village) are nowhere near Wisconsin and are nevertheless recommended for a height of 150'. The existing building height for those blocks (90') needs no change and must be maintained to avoid a dark canyon effect on North Park Avenue and to provide natural light to the pedestrian sidewalks and school bus stop along that street.

Third bullet: Given the sheer density of each of the high-rises in the Village, each should be separately evaluated under the three CR variables (commercial density, residential density and height) in light of a sensible projection of population growth in the Village. The Village high-rises should not be generally lumped in with parcels adjacent to the Metrorail Station or nearby on Western Avenue in a one-size-fits-all determination. Again, this recommendation must be reconsidered in light of what is probable in the way of population growth in the Village.

Fourth bullet: There is no justification for removal of the TDR overlay on the GEICO property, as later proposed in the Implementation Chapter. Despite the imminence of the Board hearing on the Working Draft, the Board approved an application for development of most of the GEICO property little more than a month ago, exactly as requested by the developer. That approval included retention of the TDR designation, which allows for an increase in density with TDR's (with the developer's BLT or TDR payment obligation). If the Board was satisfied that the TDR-facilitated redevelopment of the GEICO property could move forward despite

near proximate consideration of the Working Draft, there is no reason for the Board to remove the TDR designation.

Sixth bullet: This recommendation is incomprehensible except as a cross-reference to the Implementation Chapter, discussed below. In fact, as detailed below, the Implementation Chapter includes highly significant zoning considerations that would be better presented and discussed in this Section 3.1.

Specific Zoning Changes:

Maps 5 and 6, existing and proposed zoning, and Table 1, identify 20 "Blocks" proposed for a change in zoning. The entirety of the land subject to the 1998 Sector Plan is affected. Existing zoning is reconfirmed for the Brookdale neighborhood, but Brookdale is outside the current (1998 Sector Plan) area. Rezoning of the following Blocks are of special concern to the Village:

Block 1A: This Block is environmentally sensitive. It contains a healthy tributary of Little Falls Creek with several species of fish traversing the parcel on the north side. There is also a micro-climate forest planned directly across Wisconsin Avenue from this Block. There should be no additional development allowed on this site and the Working Draft should so provide.

Block 3A: The Village shares the more direct concern of Chevy Chase Village that this Block should not permit 200' tall buildings to loom over the single family homes of Chevy Chase Village. The current CR zoning, with a height limit of 55' is proper and should be retained. This is discussed more fully in response to Section 4.1 of the Working Draft.

Block 8: Redevelopment of this Block has already been approved without the necessity for a change in the height limit, currently 90'. No justification has been presented for increasing that limit (by over 100%) to 200', and would be implausible considering the current development approvals. Those approvals are based on an overall CR density (3.0) that is not proposed to change, and only a minor increases in the C and R densities are proposed, again without any specific justification beyond the generic "Increase flexibility for future development."

Blocks 9 & 10: In these Blocks, the overall CR density is unchanged at 3.0, but the mix of C and R density is made more flexible. This is not a concern for the well-established buildings. But allowed height is proposed to increase by two-thirds, from 90' to 150'. For reasons previously stated, there is no sound rationale for this extra height allowance for buildings that do not front on Wisconsin Avenue and are

not candidates for affordable housing that would have to be in newly constructed upper floors (or in a new building after razing the existing structure).

Block 11: As previously noted, this Block is far from Wisconsin Avenue and does not merit a height increase from 90' to 150'. It contains three multi-family high-rises (4701 Willard Avenue, 4615 North Park Avenue and the Elizabeth) and one of the Working Draft designated "opportunity sites" at 5550 Friendship Boulevard (discussed below). The existing CR density and height limits for the multi-family buildings should be retained, so as not to worsen the already canyon-like appearance of those buildings along North Park Avenue.

Block 12: This Block is another of the "opportunity sites" in the Working Draft. The Village recommendations for the zoning of this Block is discussed below along with the other "opportunity sites."

Block 13: This Block is far removed from both Wisconsin and Western Avenues and does not warrant further increase of the CR density and height limits already established for this Block. On the north side of the Block, the North Park Avenue sidewalk benefits from sunlight that is unavailable along almost all of the rest of that street, and enhances the safety of the school bus stop in that location. The low buildings and sunlight are a welcome, human-scale relief from the darker canyon further along North Park Avenue.

Blocks 14A & 14C: In these Blocks, made subject to CR zoning in the reclassification process in the 2014 Zoning Rewrite (in this case from the expiring TS-M zone), the overall CR density at 3.0 is unchanged, the 100' height in 14A is unchanged, and the height in 14C is increased from 100' to 150'. The C and R density limits are made more flexible, and the increased height limit for Block 14C along Friendship Boulevard is not a Village concern.

Block 14B: The 14B Block of the GEICO property, by contrast, raises significant concerns. What is proposed amounts to a vast increase in the allowable density and height over the existing R-60-TDR rezoning of the property. This increase is ostensibly justified as needed "to increase flexibility for future development." This justification is not supported by the facts on the ground. In July, the Board, at the behest of the developer, well aware of the ongoing work to update the 1998 Sector Plan, approved development of this property under the terms and conditions of its existing zoning and justified it under the rubric of the 1998 Sector Plan. The townhouse structures proposed for this Block, whether promptly built or not, will still be well within their useful life and the property will be in no

need for increased flexibility for future development at any point within the lifespan of the Plan Period.

3.3 COMMUNITY FACILITIES AND AMENITIES

The Village supports the Goals and Recommendations in the Working Draft. It recognizes both the need for "a more robust mix of community-oriented amenities" and the need to rely on "future private development due to the limited availability of public land in the Plan Area." Working Draft (p. 50). To that end, the following recommendations should be added to those enumerated in the Working Draft:

1. The **Brookdale Park** was agreed to by Warren Buffett as a 3.7 acre park to benefit the GEICO workers as well as the Brookdale neighborhood. Its tree canopy, walking paths, basketball hoop, and play equipment have long been important contributors to the quality of life both in the office park and the adjoining subdivision. This should be preserved.

2. The **Brookdale Greenway** is a critical Linear Green Park. It has long been intended to provide tree canopy and recreation. It supplements Brookdale Park, and its 50' to 70' widths were designed to not only provide not only a comfortable path for exercise, but also a heat shield. However, its intended widths have been narrowed, and it is configured with a dangerous curve to make way for townhouses that are crammed into the path of the Greenway causing a seriously unsafe, blind bend at Sherrill Avenue. This should be corrected.

3. The **Willard Avenue Promenade** from Friendship Boulevard to the Willard Avenue Neighborhood Park was intended to be 40 feet wide, curb-to-property line, but is drawn as 30' on the current SWM Combined Concept Site Development Plan. The promenade is to include two rows of trees and a 10' wide sidewalk, to which a double bike lane is now being added. A green linear park should be created in this prime location to maintain the existing mature canopy trees, and two more rows of trees should be planted.

4. A **Pedestrian Bridge** should be constructed from the proposed Library and Performing Art Center on Friendship Commons campus over Friendship Boulevard to the existing Community Center at 5311 Friendship Boulevard and adjoining Shops at Wisconsin Place and Metro Station. Given the heavy foot traffic

anticipated between Friendship Commons and Wisconsin Place, this will contribute significantly to the safety of both neighborhoods.

5. A **Little League Playing Field** near the intersection of Western Avenue and Friendship Boulevard was to be built at the start of redevelopment of the GEICO property. This long-promised field, to be one acre, should be constructed to accommodate the families in the Village of Friendship Heights, Brookdale, as well as new families that will be moving into the townhouses and apartment in Friendship Commons.

3.7 TRANSPORTATION

Goals

Second bullet: "Enhancing the current street grid" is too vague to be an intelligible goal. It is not helped by equally vague reference to a desire to both "improve connectivity" and "facilitate multimodal travel." Streets are a finite resource when it comes to allocating space among multiple modes of travel. The Working Draft should recognize that improving connectivity for one mode may come at the expense of connectivity for another mode and should discuss roadway changes with due regard for the modal effect of any recommended tradeoffs. For example, the Working Draft should reflect awareness that adding a dedicated bicycle lane to a major arterial road would be far more consequential to overall transportation goals than adding such a dedicated lane to a second or tertiary road.

Transportation Analysis

The discussion under this heading does not provide any actual analysis of transportation adequacy in Friendship Heights over the anticipated life of the new Sector Plan. It merely identifies the five "system performance metrics" used in that analysis and asserts that outcomes have been compared for 2045 as between the 1998 Sector Plan and the current proposed Plan scenario. Without any further discussion of the results of this work, the reader is simply referred to Appendix F. Working Draft (pp. 74-75). This is far from adequate to inform an interested public about whether the roads in and serving Friendship Heights will be adequate to accommodate traffic as it is likely to exist in 2045, when all or most of the additional development recommended in the Plan is completed and some traffic lanes are repurposed.

High among the Village's transportation adequacy concerns, the Working Draft fails to discuss future roadway adequacy in light of what most residents would regard as a rather drastic (50%) reduction in key traffic lanes in and through Friendship Heights. The extent of this concern can be gleaned in part from Working Draft Table 6, Street Classifications and ROW Recommendations (p. 88). Table 6 shows the following reductions in traffic lanes in Friendship Heights: Wisconsin Avenue 2 (6 to 4); Friendship Boulevard – Willard to Western 2 (4 to 2); Willard Avenue –Friendship to Wisconsin 2 (4 to 2); River Road 1 (4 to 3). In addition, in Friendship Heights, Western Avenue will reportedly have its traffic lanes reduced by 2 (from 4 to 2), and Washington Circle will reportedly be closed, reducing traffic lanes by 4. The cumulative effect of these lane closures on key Friendship Heights roadways would be a 50% reduction in traffic lanes, i.e., from 26 to 13. These closures take on added significance in light of what is foreseen as a sharp increases in the number of dwelling units in Friendship Heights. In particular, the 26.5 acre GEICO property, with no dwelling units at present, is expected to add up to about 540 units in the first phase of its redevelopment, and there will be over 800,000 sq. ft. of additional density in the second phase (which could easily double that unit total), all while the roadway network to serve the new residents that will populate these units is markedly shrinking.

In addition, it appears that much of the motivation for this land reduction process is to add bicycle lanes for which there is very little apparent demand. For example, during the community outreach process, staff queried residents of both Somerset and Chevy Chase Village regarding how they traveled to and from the Village. The answer was that bicycle use comprised about 1% of the mode of travel. 2024-2025 Engagement Summary, p. 28. Hence, in the wake of some substantial increases in population in Friendship Heights in Friendship Heights over the period of the updated Plan, compared to flat-line growth over the current Plan, closing traffic lanes for bicycle lanes appears to reflect what staff would like to see in mode choices, not what human behavior would predict.

Experienced retired engineers and land planners have looked closely at the 13 proposed land closures affecting the Village. Their conclusion, grounded not only in their general knowledge and experience regarding management of traffic, but also their particular knowledge of the traffic patterns, volume and variations along the affected roadways in Friendship Heights, has led them to conclude that the cumulative effect of all the traffic lane reductions make all too foreseeable an

essentially continuous traffic flow disaster. The next iteration of the Plan should highlight this problem and strongly recommend a close evaluation of the likely future effects of these closures before they are allowed to occur.

Pedestrian Network

Fourth bullet: Street lighting improvement is especially needed along Willard Avenue, where low lighting has precipitated safety concerns for nighttime pedestrians.

3.8 ENVIRONMENT

Goals

The Working Draft (p. 101) lists seven environmental goals for Friendship Heights. They include restoring a dense street tree canopy everywhere, protecting mature canopy trees, reducing impervious areas, increasing shade in both the landscape and streetscape, and enhancing climate resiliency to reduce urban heat. The common denominator of all of these goals is the need to protect and preserve existing tree canopy, which involves all trees providing shade—both mature trees and younger shade trees that will eventually replace the older ones. A separate section on Tree Protection recognizes this and calls for "maximiz[ing] tree protection and minimiz[ing] the removal of trees on private and public property." Working Draft (p. 103).

These words ring hollow to the residents of the Village and Brookdale, who live adjacent to the largest site in Friendship Heights that is going through a redevelopment process for the entirety of the 26.5 acre GEICO property. There, in strong affirmance of these environmental goals, Friendship Heights has benefitted from a major proliferation of maturing trees in the 65 years since the GEICO headquarters—and nothing else—was built on the property. In 1998, there were at least 585 trees on the property that have continued to grow over the years since. But in approving the first phase of property's redevelopment just recently, the Board decided to allow that precious environmental benefit to be almost entirely lost. The County Executive recently described this outcome in the following terms: "In the Planning Board's July review of [the] proposed development, called Friendship Commons, local community representatives and hundreds of residents wrote, and many testified, to object to the virtual clear-cutting of mature specimen trees on the former Geico tract." The Board still has time to reverse course.

For the future, the Working Draft should reflect the lesson that should have been learned in the GEICO redevelopment process: that it is not necessary to choose between mature canopy trees and townhomes. As new development projects are evaluated, the Board needs to forthrightly acknowledge that trees and townhomes can and should coexist as complementary to each other. If this means a slightly less dense project, it is all for the betterment of the new residents that will arrive as well as the larger community in which they are located.

CHAPTER 4: SITE-SPECIFIC RECOMMENDATIONS

Chapter 4 discusses rezoning and the redevelopment potential for four sites within the Sector Plan Area, deemed "opportunity sites." The introduction to the Chapter explains that these are the sites in Friendship Heights that "are likely opportunities for future development," in that they "have existing untapped development potential under the current zoning." Working Draft (p. 114). This phraseology reflects a seriously mistaken understanding of the zoning approval process. All of the properties are in the CR zone, where each property is distinguished by four variables: overall density (in project square footage), commercial density; residential density; and building height. For each variable a maximum is shown, but that maximum is not a legal entitlement. For every project, there are numerous development standards that must be met. In addition, topography, soil conditions, natural features and other variables can impact achieving maximum allowed density or height. The CR zone was developed as an alternative to more rigid Euclidean zoning; density and height allowances can be approved contingent upon providing certain public benefits that are not intrinsic to the project. It is quite ordinary for the final result of a CR-zoned project approval to reflect less than the theoretically maximum possible densities and building height. If the developer has made the best of it in maximizing the development potential of the property within existing zoning constraints, there is no leftover "existing untapped development potential," especially if the development potential assigned to the property was deemed proper and appropriate when it first came under CR zoning.

In Maryland, and in Montgomery County in particular, it has been the rule for many years that there is a strong presumption of correctness of original zoning and comprehensive rezoning, and piecemeal change in the zoning of such properties requires strong evidence of a mistake in the zoning or of substantial change in the

character of the neighborhood. E.g., *Cabin John L.P. v. Montgomery County Council*, 259 Md. 661, 669-670 271 A.2d 174. 179 (1970). Each of the four "opportunity sites" is proposed for a change in the components of the CR zoning, and each is evaluated in the Working Draft not in terms of this "change or mistake rule," as it is known, but rather in terms of the flawed "untapped development potential" notion that simply cannot be the legal predicate for obtaining District Council approval of a change in the zoning of those properties. In short, if the Board were to approve the staff analysis of the "opportunity sites" as set forth in the Working Draft, there would be every reason to rightly expect that their rezoning as proposed would properly be rejected at the District Council upon review of such a Board-approved draft of the Sector Plan.

4.1 WISCONSIN AVENUE EAST

The identified zoning Blocks included in this "opportunity site" are Blocks 2A, 2B, 2C ,3A, 3B and 4. For each an increase in allowable building height is proposed that, collectively, considering all existing development, is truly massive.[3] These height increases will indeed facilitate the "untapped development potential," i.e., density, associated with existing or increased building height limits, as detailed in the Implementation Chapter of the Working Draft (pp. 142-143). But no claim is made that the existing zoning (as to height or density) was a mistake or that there has been a substantial change in the character of the neighborhood. Rather the justification appears to be a hope that these changes will facilitate a return of Friendship Heights to its irreversible faded glory as a "regional destination." Working Draft (p. 115). The resulting drastic height transitions to the adjacent Chevy Chase Village neighborhood of single-family detached homes is proposed to be ameliorated by urban design recommendations that attempt to reduce the appearance of higher buildings to adjoining Chevy Chase homeowners, rather than imposing actual zoning-based height limits that track zoning compatibility standards. This point is discussed in greater detail in connection with the overlay zone recommendation in Section 5.1.

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[3] For each Block, the change in maximum height is as follows: 2A- 35' to 100'; 2B- 90' to 100'; 2C- 35' to 150'; 3A-55' to 200'; 3B-90' to 200'; and 4-145' to 250'. Working Draft (p.36).

The Working Draft makes no attempt to justify any of this with reference to traditional zoning values, such as increased light and air, compatibility or reduction of traffic congestion (which can only increase, likely significantly).

Instead of adding to the "canyonization" of this stretch of Wisconsin Avenue, one might have hoped that staff would have seen the potential arising from a recommendation that the widely admired and very stylish Saks building be targeted for conversion to a residential building—and become a valued reminder of an earlier but now bygone era of Friendship Heights as the premier high-end retail shopping district in the metropolitan area.

4.2 5550 FRIENDSHIP BOULEVARD

The Working Draft notes that this property contains a 5-story office building that fronts on a driveway and contains an open lawn space fronting on both Friendship Boulevard and North Park Avenue that is proposed to stay green space. The Working Draft nevertheless continues its focus here on "untapped development potential," identifying this site as "an opportunity for future growth within the Village. . ." Working Draft (p, 125). This discussion makes no mention of the careful consideration of the future for this property in the 1998 Sector Plan (pp. 76-77). The Village was quite satisfied with the treatment of this property in that Plan and still views its terms as the standard from which any departure in the Working Draft should be justified.

The 1998 Plan notes, as is still accurate today, that the 2.14 acre site contains a 132,000 sq. ft. office building, with one story below grade and five above. With the building located along the western side, what is left is 1.07 acres of open space. The Plan recommended retaining this open space "to offset surrounding high densities," and to increase the setback on the west side if the property were it to be redeveloped with another building. Just as these recommendations go unmentioned in the Working Draft, so it is the case that no justification for changing them is mentioned in the Working Draft.

When the property was reclassified from the CBD-1 zone to the CR zone in the course of the 2014 Zoning Rewrite, it was simply lumped in with other properties in Block 11 where existing heights were matched with a height limit of 90', even though the height of the existing building on this property is 76'. The proposed rezoning height in the Working Draft does not correct this; rather it does just the opposite—propose a doubling of the allowed height to 150'. The Village is strongly opposed to redevelopment of the property with a residential building exceeding the

current 76' height, and doubly so for any height increase over the current CR zoning of 90'.

Further, the Working Draft's recommended Urban Design guidelines for any such redevelopment will not ameliorate the adverse impact on surrounding properties that would be created by squeezing in yet another high-rise building into this crowded Village location. Any such high-rise would exacerbate the already sparse amount of light, air and visibility in this area and add to the canyon-like effect of development along North Park Avenue.

Additionally, while the existing lawn area of approximately .5 acres would be retained in place, as much or more of the current open space total of 1.07 acres could be lost in redevelopment—a loss that would be especially impactful on the adjacent block to the east, which includes a low-rise assisted living building behind the low-rise Village center, and the beautifully furnished and maintained Hubert Humphrey Park, which the staff found through its community engagement process (as detailed in Appendix B) is the easiest park in Friendship Village to find and to access, and unsurprisingly, the most visited. On Village-owned property and operated by the Village, Hubert Humphrey Park is the locus of numerous functions sponsored or facilitated by the Village. Risk of lost open space across the street at 5550 Friendship Boulevard can and should be addressed with a recommendation to maintain an additional half acre of open space in the event of redevelopment, to be located along Friendship Boulevard.

It also must be noted that the Village's views on this "opportunity site" rather closely track what staff learned in September 2025 when it convened stakeholders in-person and virtually to discuss its future development. Staff summarized this event in the 2024-2025 Engagement Summary (p. 47) as follows:

> Participants were particularly concerned about the impact of future high-rise development on the block's light, air flow, and sense of openness. Notably, on this site, stakeholders were most concerned about maintaining existing green space, not asking for new green space. They called for open space to break up building mass and provide outdoor gathering areas for the adjacent senior living community, whose residents frequently use the existing open lawn. Many participants supported added density on this site only if it includes accessible, high-quality open space. Comments also pointed to

opportunities for small gardens, shaded seating, or pocket parks that would maintain visual relief and greenery amid a denser context.

4.3 SHOEMAKER BLOCK PARCELS

Before turning to the specifics of redevelopment of this parcel, identified as Block 13 for zoning recommendations, it is important to comment on Shoemaker Lane itself, which is not discussed in this Section. Any future development in proximity to that Lane should not adversely impact its integrity as the only one-traffic-lane street in Friendship Village. Working Draft, Table 6 (p. 88). Maintaining a single traffic lane will ensure safe entry onto or across Willard Avenue for vehicles or pedestrians. The street contours add to its charm and facilitate the presence of mature trees and green ground cover on both sides of the street.

Block 13 was formerly designated as "Parcel 6" in the 1998 Sector Plan (p. 74), and its description then is still largely current: "the last remaining parcel in the Sector Plan area that has small-scale buildings evoking the character of the pre-high-rise era." Block 13 currently contains three houses fronting on North Park Avenue that are no longer in residential use, a low-rise office building fronting on both North Park and Shoemaker, and a house and another low-rise office building, each fronting on Willard Avenue. The 1998 Sector Plan has two recommendations: (1) creation of "a neighborhood park for the enjoyment of apartment residents [living nearby] and for visual relief from the surrounding high-rise structures." And (2) "Preserve as much as possible of the small-scale character of existing structures." These recommendations were the basis for six design guidelines proposed to implement them. Village considers these 1998 recommendations to still be generally sound today.

Urban Design Recommendations

The eight bullet points recognize and seek to preserve the relief this parcel provides Villagers from the high-rise canyon stretching along North Park Avenue from beginning to end. But the current Recommendations need adjustment. First, the building height limit along North Park should not be 75'; it should be 45'. This would permit reasonable development of 4-story townhomes that would respect and not increase the density in this area. None of the four existing buildings facing North Park on this Block exceed 40' in height, and they add much needed light and air to that street.

Second, on redevelopment, setbacks along North Park should be determined in consultation with the Village which owns two properties that would be affected by the setbacks, which should be no less than 50', preferably more. These setbacks would increase the separation from the apartment across the street at 4615 North Park Avenue, reducing the "canyon effect" along the street. This will also provide visual relief for the residents of 4615 that face the Avenue.

Third, ground floor commercial frontages should not be encouraged along North Park, or along the sloping Shoemaker Lane. Retail use would also be impractical along Willard Avenue.

Fourth, the 65-space parking structure for 4600 North Park should be viewed as a positive asset to the Village, not something to be replaced.

Fifth, with respect to the proposed open space in this block, Working Draft Fig. 23 (p. 129), it is not clear what its recommended size and location will be. Upon redevelopment of properties facing North Park, the Working Draft should directly recommend providing the open space behind the buildings—a courtyard at the same level as North Park, accessible to the public, such as illustrated in Fig. 25 on p. 130. But wherever the needed open space is determined to be located, the Village supports the open space recommendations in the Working Draft (p. 130).

Sixth, the Willoughby Condominium, which is located across Shoemaker Lane from this Block, is providing the Board with its own set of Recommendations, some of which relate to this property. The Village has reviewed all of the Willoughby Recommendations. They go beyond the environs of Shoemaker Land and the Village fully supports them. As such they need not be repeated here.

4.4 FORMER GEICO SITE (5620 WESTERN AVENUE)

The Working Draft does not focus on or discuss the process culminating in the Board approval at its last (July 30, 2026) public hearing of the application of Friendship Commons Partners (FCP) for approval of most of the acreage of the GEICO property, which excluded development fronting on Friendship Boulevard. The Village objected to this sort of piecemeal development review of the GEICO property, but this did not deter the Board from reviewing and approving the FCP's partial development proposal. Even if the Board decides that with that partial approval of GEICO property redevelopment it is relieved of the obligation to assess future development of that part of the GEICO property over the life of the Plan

Update, that does not relieve the Board from the obligation to review future possible development of the portion of the excluded GEICO property. The Working Draft should undertake this process; otherwise, it is seriously incomplete. Further, the Working Draft should, at the least, contain a footnote to the effect that the contested Board approval is not a final decision; it awaits a formal resolution, which, in light of current challenges, may not be resolved before final action is taken on the Sector Plan by the District Council. Instead of such an inconclusive footnote, the Board should consider evaluating redevelopment of the entire GEICO property without regard to what has been sought on plan review, and in the process take into account the Binding Elements that the Board told GEICO in November 2025, as a condition of preliminary plan approval, that GEICO must comply with in any redevelopment of the property.

Apart from those issues, the Working Draft makes a number of observations the warrant comment from the Village. First, the Village notes it agreement with Staff that it is worthwhile to focus on the height transitions between GEICO property redevelopment and adjacent and adjoining properties, both in Brookdale and across Willard Avenue in the Village.

Second, the Urban Design Recommendations are surely necessary, but consideration should be given to whether they are sufficient and sufficiently detailed, particularly in light of the massive amount of mature tree canopy removal that is envisioned in future redevelopment of the property. Some specific recommendations are set forth above under Section 3.3 – Community Facilities and Amenities, but that is just a start for further needed revision.

Third, the Public Spaces Recommendations are primarily focused on space likely to be used primarily by Brookdale residents and new residents who will locate on the GEICO property itself. While numerous deficiencies are readily apparent in comparing what has been proposed and what was earlier required in the 1998 Sector Plan and the associated 1998 rezoning of the GEICO property, the Village will rely on the commentary of the Brookdale Citizens Association to reflect appropriate concern over the adequacy of the Working Draft on this topic, which includes Brookdale Park, the Linear Park, the Active Recreation Spots (near Western Avenue or in Brookdale Park), and Gateway Plaza.

Fourth, the Village notes its agreement with the Environment Recommendations regarding specimen tree preservation and the buffering of the existing stream stub for increased forestation and improved stream health.

5.1 ZONING

Friendship Heights Overlay Zone

The Working Draft recommends creation of a Friendship Heights Overlay Zone (FHOZ) for the entirety of the Plan Area, excluding only the single-family homes in Brookdale, Brookdale Park and the Willard Avenue Neighborhood Park. Working Draft (pp. 139-140). No exact wording of a proposed Zoning Text Amendment is supplied, precluding comprehensive evaluation of the proposal. What is disclosed is that the FHOZ "will implement the recommendations of this Plan related to incentive density, public benefits, building height transitions, and other recommendations." *Id.*, p. 139. While not clear, it may be that the intention of the FHOZ is to impose additional height limits and transition recommendations only to the "opportunity sites" set forth in Chapter 4.

Apart from the uncertainty of the geographic scope of the unformulated FHOZ, implicit in the overlay zone concept is that there are some areas where existing zoning development standards will likely be inadequate to maintain what staff describes as "crucially important," i.e., "appropriate height transitions between . . . properties as recommended in the Plan." *Id.* For example, in the discussion of possible new buildings in the Wisconsin Avenue East opportunity site, the Working Draft recommends use of "Compatibility Planes" that are more restrictive than those required under the Zoning Ordinance, found at §59.4.1.8. (setback and height compatibility). *Id.*, pp. 117, 119-120. What these tougher FHOZ compatibility standards do is increase building setback requirements and, possibly, lower the allowed building height. But everywhere the FHOZ is likely to control, the development is likely to take place under the CR Zone Optional Method, where building placement is established in the site plan approval process, §59.4.5.4.B.3., where the Board will use the Standard Method height and setback rules as an initial frame of reference. One is left to wonder why any compatibility problem cannot be addressed under conventional standards, i.e., without adding an overlay zone to the process. The most straightforward answer would be that the building height maximums being proposed are simply too great to accomplish proper compatibility with adjacent properties without the extra FHOZ provisions. Whether this is or is not a principal motivation behind the enhanced compatibility planes expected to be in the FHOZ is a matter that should be fully explained in the Working Draft.

Public Benefits in CR Zones

The Working Draft proposes a modification of the CR-based Public Benefits for the Plan Area, which, in practical terms, is coincident with the area of the FHOZ, in that all CR development will be in the FHOZ area. The modification consists of elevating some Public Benefits to the higher status of being "Priority Public Benefits," as is allowed under the Zoning Ordinance, but only upon enactment of an overlay zone, i.e the FHOZ in this instance. §59.4.7.1.B.7. The Benefits chosen for Friendship Heights elevation are Housing for All; Art and Placemaking; and Neighborhood Services and Mixed Use. Working Draft (pp. 141-42). No discussion of these particular choices is contained in the Working Draft, a significant omission that should be corrected. It would also be particularly helpful to citizen comprehension of what is being proposed--to illustrate with a plausible example how the desired Priority Public Benefits would operate to produce a particular zoning-compliant new building on one of the opportunity sites.

Excel-to-Build Density Above Mapped Density

Deep into the Implementation Chapter of the Working Draft (pp. 142-43), staff states that the "FHOZ presents an opportunity for projects to obtain density to build above the mapped density, but only up to the mapped height." What is proposed is extra density at either 1.5 times the standard rate of Public Benefit increase or 2 times the rate for Priority Public Benefits. But the extra density must come from a "centralized pool." Incentive Density Implementation Guidelines for CR & CRT Zones, p. 12 (2025).

This, again, is set forth without any helpful explanation or illustration of how it would work in actual practice in one of the Friendship Heights opportunity sites. If there is a "centralized pool" of extra density, readers of the Working Draft are left in the dark regarding from whence did it came and what its extent is. These additional significant omissions are compounded by the fact that "Excel-to-Build Density" is an entirely new concept likely to be unfamiliar to anyone lacking a deep understanding of how development may occur in the CR zone, and perhaps even to those who do understand CR zoning but have not even heard about this latest (2025) wrinkle in it, that may in many circumstances elevate mapped building height over mapped density (FAR) as the principal limiting factor on the bulk of a building.

Small Sites

The Working Draft (p. 143) describes a relaxed Public Benefit requirement for properties with an FAR greater than 3.0. If all the zoning recommendations in the Working Draft were implemented, this provision would apply only to Blocks 4 and 6. The Working Draft should more forthrightly explain exactly what is foreseeably contemplated in the way of Block 4 or Block 6 redevelopment before this proposal can be sensibly evaluated, or, at the very least, explain how and why this might be of future benefit in reaching the goals of the Sector Plan once it is complete and final.

GEICO TDR Overlay Zone

This is a repeat of a recommendation in Section 3.1, Land Use and Zoning. The Village's opposition to this recommendation is set forth in its discussion of that Section.

5.2 CAPITAL IMPROVEMENT PROJECTS

Table 7 appears to be incomplete. The "Plan Reference" column is empty throughout the Table, significantly impairing its usefulness. The rightmost column on lead and coordinating agencies does not clearly distinguish lead from coordinating agencies and may have overlooked some involved agencies. For example, the Village is listed as an agency on the upgrading of brick crosswalks but not brick sidewalks. In some cases, the agency is listed as "Private." Where the work is to be privately funded or directed, partially or fully, is not made clear. There also appear to be omissions in connection with park construction or improvement, including Page Park and some of the parks proposed for the GEICO property redevelopment.

September 10, 2026

Francine Kerner Klein, Esq.
Vice-Chair, Village of Friendship Heights Council
Chair, Village Development Advisory Committee