Gatling, Tsaiquan

From: Hisel-McCoy, Elza

Sent: Wednesday, September 3, 2025 4:28 PM To: Gatling, Tsaiguan; Dickel, Stephanie

Cc: Kronenberg, Robert

Subject: Fw: GEICO Preliminary Plan Amendment No. 11999039A

Categories: Tracked To Dynamics 365

FYI



Elza Hisel-McCoy (he/him)

Chief, West County Planning

Montgomery County Planning Department 2425 Reedie Drive, 14th Floor Wheaton, MD 20902 elza.hisel-mccoy@montgomeryplanning.org 301.495.2115









From: Allie Williams <a williams@greaterbethesdachamber.org>

Sent: Wednesday, September 3, 2025 4:14 PM To: MCP-Chair <mcp-chair@mncppc-mc.org>

Cc: Hisel-McCoy, Elza <elza.hisel-mccoy@montgomeryplanning.org>; Margolies, Atara

<a href="mailto: <a href="

Subject: GEICO Preliminary Plan Amendment No. 11999039A

[EXTERNAL EMAIL] Exercise caution when opening attachments, clicking links, or responding.



Dear Chair Harris,

I am writing on behalf of the more than 600 members of the Greater Bethesda Chamber of Commerce in support of Preliminary Plan Amendment #11999039A for the property currently owned by GEICO in Friendship Heights. The amendment extends the validity period of the 1998 approved Preliminary Plan, which includes 300 multi-family units and 200 townhomes. It also dedicates to the Parks Department the more than three-acre Brookdale Park, currently owned by GEICO.

The Greater Bethesda Chamber supports government policies that focus on creating new housing that is affordable to a variety of incomes, as well as building new housing near high-capacity transit. The plans for the GEICO property, just steps away from Friendship Heights Metro is certainly consistent with those policies.

Our support for the Amendment application is based on the following:

- This is not a new plan. Rather, the 1998 Preliminary Plan (which this application seeks to extend) is the result of a working consensus between a number of parties, including the Friendship Heights Village Council and GEICO. It made sense in 1998 and it makes sense now. We understand the reasoning for the one change to the Plan, which deletes the plans for high-rise office space.
- The plan not only increases the County's housing supply; it also calls for 15 percent of the 500 units to be Moderately Priced Dwelling Units, providing opportunity for 75 potential residents and families to locate in an otherwise out-of-reach community due to economic constraints.
- Friendship Heights is on the cusp of re-establishing itself as an attractive location for retail and dining. However, there have been difficulties in achieving that goal, such as the recent closure of The Heights Food Hall. We need to revitalize the area by adding more and diverse residents that will support the businesses who choose to locate there.

We therefore request that the Planning Board vote to approve Preliminary Plan Amendment #11999039A.

Thank you for your excellent service and dedication to making Montgomery County the best it can be.

Sincerely,

Allie Williams, IOM
President & CEO
Greater Bethesda Chamber of Commerce
7910 Woodmont Ave., Suite 1204, Bethesda, MD 20814
P: (301) 652-4900 x 203; C: (301) 768-2212
AWilliams@greaterbethesdachamber.org

Home:

8200 Wisconsin Avenue, Apt. 217 Bethesda, MD 20814 Awwilliams@gmail.com

From: <u>Hisel-McCoy, Elza</u>

To:Dickel, Stephanie; Gatling, TsaiquanCc:Margolies, Atara; Klevan, Larissa

Subject: Fw: GEICO Preliminary Plan Amendment No. 11999039A

Date: Thursday, September 4, 2025 10:29:51 AM

Attachments: <u>image.png</u>

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FYI



Elza Hisel-McCoy (he/him)

Chief, West County Planning

Montgomery County Planning Department 2425 Reedie Drive, 14th Floor Wheaton, MD 20902 <u>elza.hisel-mccoy@montgomeryplanning.org</u> 301.495.2115









Cc: Hisel-McCoy, Elza <elza.hisel-mccoy@montgomeryplanning.org>; Margolies, Atara

<Atara.Margolies@montgomeryplanning.org>

Subject: GEICO Preliminary Plan Amendment No. 11999039A

[EXTERNAL EMAIL] Exercise caution when opening attachments, clicking links, or responding.

Dear Chairman Harris,

I am a resident of Friendship Heights in Chevy Chase. When I moved into my condo in 2008, Friendship Heights had a vibrant commercial area; indeed, it was one of the reasons I moved here. Sadly, those days are over. Even with the addition of a few restaurants, Friendship Heights remains largely a dead zone commercially.

I have been heartened by the plans to redevelop the GEICO property and therefore support GEICO's Preliminary Plan Amendment application for the site. This amendment simply extends for 10 years the already approved Preliminary Plan from 1998, with the exception of the removal of high-rise office space, which makes sense given the current office market.

If Friendship Heights is to thrive again, it needs new residents with a broader demographic profile, which I believe the GEICO redevelopment will address. I like that the Plan still calls for no more than four-story apartment buildings on Willard Avenue, as well as for townhomes

throughout. The Plan also includes the extension of Shoemaker Farm Lane and North Park Avenue into the new development. While I understand these roads are necessary for access into the new development, I would oppose any extension of the new roads to Western Avenue.

I was pleased to learn that the plan includes GEICO's donation of Brookdale Park to the County, and that pedestrian access to the Park from the Village will be created. At present, it is very difficult for us to gain access to Brookdale Park. I am a proponent of ensuring that there is plenty of open and green space for us all to enjoy, and I encourage the Planning Board to examine how best to achieve that goal on the balance of the site.

I understand that discussions regarding the best use of the land that formerly called for office space will take place during Sector Plan deliberations. I support adding high-rise apartment buildings on that site, as long as it also includes space for the types of community amenities that will enhance our experience as local residents.

I have loved living in Friendship Heights for the past 17 years. I believe the community envisioned in the Preliminary Plan Amendment will inject new vitality into the community. I hope the Planning Board will support this application.

Sincerely,
Patricia Donovan
4620 North Park Avenue, #607W
Chevy Chase, MD 20815
917-545-4237

From: <u>Hisel-McCoy, Elza</u>

To: <u>Dickel, Stephanie</u>; <u>Gatling, Tsaiquan</u>

Subject: Fw: GEICO Preliminary Plan Amendment No. 11999039A

Date: Monday, September 8, 2025 9:14:42 AM

Attachments: <u>image.png</u>

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FYI



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Chief, West County Planning

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From: nancy peavy <nancypeavy@gmail.com> **Sent:** Saturday, September 6, 2025 3:46 PM **To:** MCP-Chair <mcp-chair@mncppc-mc.org>

Cc: Hisel-McCoy, Elza <elza.hisel-mccoy@montgomeryplanning.org>; Margolies, Atara

Atara.Margolies@montgomeryplanning.org

Subject: Fwd: GEICO Preliminary Plan Amendment No. 11999039A

[EXTERNAL EMAIL] Exercise caution when opening attachments, clicking links, or responding.

Re:Geico Preliminary Plan Amendment No. 11999039A

Dear Chairman Harris,

We are writing to express our support for the Preliminary Plan Amendment application related to the GEICO property in Friendship Heights.

We are residents of the Village of Friendship Heights. We moved here from Bethesda in 2002. When we moved here it was an exciting place to live. My husband had retired then and I continued to work, taking the subway downtown while he enjoyed the grocery chains, the quick but good restaurants and the huge variety of retail options.

We are so sad that this is no longer Friendship Heights. Yes, there have been some restaurant additions over the past five years, but some of those places are struggling or have closed. Most recently, The Heights Food Hall closed its doors in August after being open for just two years.

Our community strongly needs more residents to support new retailers and restaurants. Thus, we were very pleased to hear about the plans to extend the validity period of the Preliminary Plan for the GEICO property. Our condominium faces the site, so we have a particular interest in any redevelopment that will be part of our view in the future.

Extending the Preliminary Plan to allow for redevelopment will help bring a variety of new people to the neighborhood. The Plan's 300 new apartments and 200 new townhomes could give us the "shot in the arm" that will help regain the vitality of the area. It makes sense to build new housing here as we are so close to the Friendship Heights Metro.

We are not opposed to the plans that extend North Park Avenue and Shoemaker Farm Lane across Willard Avenue into the new community. Those roads already extend into the GEICO parking lot, so maintaining that connection makes sense. We would be concerned, however, if the plans call for cut-through traffic all the way to Western Ave. Thankfully, this is not called for in the amended Preliminary Plan.

We understand that the application eliminates the plans for high-rise office space on Friendship Boulevard. That makes sense, given the post-pandemic office market. Perhaps that space could be used for community amenities such as a library or performing arts center, in addition to more housing. We look forward to having that discussion as part of the Sector Plan process.

We have great hope that your appreciation of the need for changes in our community will help you approve the Preliminary Plan Amendment application.

We thank you for your consistent concern about making Montgomery County a vibrant, successful County.

Nancy and Bob Peavy 4620 North Park Ave. 206W Chevy Chase, MD 20815 202 549-5005

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From: <u>Gatling, Tsaiquan</u>
To: <u>Gatling, Tsaiquan</u>

Subject: FW: Geico Preliminary Plan-Amendment 11999039A

Date: Tuesday, October 14, 2025 9:55:00 AM

----- Forwarded message -----

From: Nila Vehar < nilavehar@gmail.com >

Date: Thu, Sep 11, 2025 at 8:16 PM

Subject: Geico Preliminary Plan-Amendment 11999039A

To: <<u>mcp-chair@mncppc-mc.org</u>>

Cc: <<u>Atara.Margolies@montgomeryplanning.org</u>>, <<u>elsa.hisel_mccoy@montgomeryplanning.org</u>>

Dear Chair Harris,

I support the application for the Amended Preliminary Plan application for the GEICO property in Friendship Heights.

I have lived in Friendship Heights since 1995. It's a great place to live, yet we are stagnant in planning to meet future needs. This is a plan that will address unmet needs in housing. And the addition of 500 new apartments and townhomes will attract residents of all types, bringing vitality to our neighborhood and helping to bring more retail and eating establishments to the area.

This application is merely extending the validity period of the Preliminary Plan that was approved by the Planning Board and supported by the Friendship Heights Village Council in 1998. The only difference is that the plans for high-rise office space have been eliminated, which makes perfect sense, given the change in the demand for office space. I look forward to seeing how the Planning Board approaches the use of that space during upcoming Sector Plan deliberations.

I urge the Planning Board to support this amendment to the Preliminary Plan. It will make our wonderful community even more vibrant and diverse. In my view, it is short sighted to oppose this development, especially when our neighborhood is behind the curve in encouraging new development that will refresh Friendship Heights. This will be welcome addition to our neighborhood.

I therefore respectfully ask that the Planning Board approve Preliminary Plan Amendment No. 11999039A.

Thank you for your consideration.

Nila Vehar 4620 North Park Avenue 1602 W Chevy Chase, MD 20815 **From:** Abner Oakes <aoakes4@gmail.com> **Sent:** Tuesday, October 7, 2025 6:44:28 AM **To:** MCP-Chair <mcp-chair@mncppc-mc.org>

Cc: Hisel-McCoy, Elza <elza.hisel-mccoy@montgomeryplanning.org>; Margolies, Atara

Atara.Margolies@montgomeryplanning.org

Subject: GEICO Preliminary Plan Amendment No. 11999039A

[EXTERNAL EMAIL] Exercise caution when opening attachments, clicking links, or responding.

Good morning, Chair Harris.

I am writing on behalf of the Brookdale Citizens' Association to encourage the Planning Board to approve Preliminary Plan Amendment #11999039A for the GEICO property in Friendship Heights. By way of background, our association was founded in 1958 and encompasses Brookdale North and South, Orchardale, Wohlshire and Park-Newport.

We worked in collaboration with GEICO representatives decades ago to create a plan for their property that was compatible with our priorities. The Preliminary Plan that was approved in 1998 is a product of that collaboration, and we supported its approval.

Now, more than two decades later, we remain in support of that Plan. The Amendment under consideration by the Planning Board simply extends the life of the 1998 Preliminary Plan. The only difference is that the Amendment removes high-rise office buildings, which we fully understand due to the shrinking demand for office space.

We are particularly pleased with the provision for GEICO to dedicate Brookdale Park to the County, ensuring that our residents will continue to enjoy the peaceful nature of the green open space.

For these reasons, we hope that the Planning Board will vote to approve Preliminary Plan #11999039A, including the Binding Elements G-760-AP dated 8-2-98, 9-1-98, and 9-11-98 from the associated rezoning application, and other requirements of Resolution No. 13-1461 introduced and adopted October 13, 1998 and Montgomery County Planning Board Opinion for Preliminary Plan No. 1-99039, Project: Friendship Commons (GEICO), Date of Hearing: February 11 and 25, 1999, Mailed May 13, 1999.

Thank you for your kind consideration.

Abner Oakes President Brookdale Citizens' Association 4807 Dover Court, Bethesda, MD, 20816 301-767-7508

Links to relevant documents:

G-760 AP Development Planning board approval, Feb 1999, plan 1-99039 Application G-760 for amendment to zoning ordinance map, Oct 1998

LAW OFFICES OF

KNOPF & BROWN

DAVID W. BROWN SOLE PRACTITIONER ADMITTED IN D.C. & MD 503 WOODLAND TERRACE ALEXANDRIA, VIRGINIA 22302 (301) 335-5646

EMAIL: BROWN@KNOPF-BROWN.COM

VILLAGE OF FRIENDSHIP HEIGHTS

Talking Points on GEICO Preliminary Plan #11999039A September 22, 2025 (for 9/24/25 meeting with Staff)

1. GEICO does not meet the criteria for either Plan or APF validity period extension.

The Application is an amendment that, if granted, would change more than the validity periods. Staff, however, is considering whether to treat it as just an extension application, with the expectation of later changes to the plan as a major amendment. For reasons detailed below, the extension should not be considered in isolation, and should be denied in any case.

As an extension application, the request is to extend the current Plan and APF validity (June 13, 2026 for both) by an unspecified number of years. The request is an implicit acknowledgement that GEICO cannot validate the Plan by that date and lacks sufficient preparation to identify the appropriate minimum extension of the validity periods.

GEICO has been the beneficiary of multiple plan and APF validity extensions, adding up to 24 years since the original validity periods expired in 2002. To get another for the Plan, GEICO must show either that delays caused by others have prevented validation (50.4.2.H.3.a.i.) or that exceptional or undue hardship would result from extension denial, due to events not caused by GEICO and beyond its control, and only if such events are significant, unusual and unanticipated (50.4.2.H.3.a.ii.).

In its Justification Statement, GEICO does not attempt to demonstrate how it has met its burden of proof (50.4.2.H.3.b.) on either of these grounds, and what it does claim does not cure this failing. GEICO claims that just this

year, it determined "that the existing headquarters building no longer meets its needs both because of the condition of the building and the overall size of its daily workforce." But the record in this case is starkly to the contrary. This determination was made by GEICO more than 20 years ago when it filed the Preliminary Plan for approval. But since then, GEICO has had a change of mind about keeping its headquarters in Friendship Heights, and is in the process of moving its HQ to Bethesda. This is a corporate decision GEICO is obviously free to make, but it is not a valid basis for plan extension.

GEICO also asserts that "extending the validity period . . . will facilitate . . . walkable transit-oriented development" and "better provide both market rate and affordable housing for the community, as well as open space and amenity features." But these considerations are irrelevant to meeting the criteria for obtaining an extension. If the extension cannot be met, neither the Property nor its development potential along the lines stated by GEICO are foreclosed. Either GEICO or some successor can restart the process afresh under current development standards and requirements. This would be with the benefit of the now clarified understanding that (a) GEICO is leaving Friendship Heights and (b) the location where GEICO once planned to relocate its HQ will no longer be thought of as potential space for a major office complex. Further, the exceptional length of the successive extensions to date has resulted in an extraordinarily dated unbuilt, Preliminary Plan, whose expiration in June 2026 meshes quite well with the process now underway to update the 1998 Friendship Heights Sector Plan. That event gives the Village the renewed and updated opportunity to again do what it did in the years that led to adoption of the 1998 Plan: proactively involved in producing a detailed, consensus plan development of the Property.

2. An extension cannot or should not be contemplated on a plan which excludes all detail of anticipated development of over half the approved floor area and 20% of the land area.

GEICO's Justification Statement states that "GEICO is seeking only to extend the validity periods for the residential component of the Preliminary Plan (200 townhomes and 300 multi-family units). . . . GEICO is not seeking to extend the validity for the 810,000 sq. ft. of commercial." In fact, the commercial

floor area, on lots comprising less than 20% of the Property, will take up more than 50% of the floor area approved for the entire Preliminary Plan—a very substantial change in the Plan by any measure. The result is a large blank spot on the proposed revised version of the Plan it has submitted with the Application. GEICO further states that the commercial area "will be the subject of a future development application." In a recent letter to the Village, GEICO made clear that with the approved extensions, it will move forward with the existing and approved plan for the 200 townhomes on the R-60-zoned portion of the Property and 300 multi-family units on part of the CR-zoned portion of the Property, and then work with the Village and other neighbors to identify uses for the portion of the Property that was designated office space along Friendship Boulevard. What this portends is that during the now ongoing process of updating the 1998 Sector Plan, GEICO will take the position that development of about 80% of the area of the Property is fixed and settled by virtue of the approval of the extension requests, and the other 20% is "uncertain, but not office."

This process is contrary to both the letter and the spirit of the preliminary plan approval process. One of the requirements of the preliminary plan drawing to be submitted to the Board is a graphic representation of the subdivision (all, not just part of it), showing, *inter alia*, "the proposed use of all lots on the preliminary plan and the scaled dimensions and approximate area of ease use," 50.4.1.B.7.i., as well as the "location, type and width of all existing and proposed rights-of-way." 50.4.1.B.7.h. Accordingly, the Board's Intake Checklist requires details of the uses in square feet per unit, building heights and layout and dimensions of roads/points of access, sidewalks and more. Inclusion of such details, required on the originally submitted plan, is also required for major amendments, (50.4.2.F.1.) which is what GEICO's application states is what it has submitted. This information is also critical to the subdivision layout findings that the Board is required to make (50.4.2.D.1).

Nor is this incomplete revision of the Preliminary Plan just a technical defect. GEICO has made clear this "white hole" on the revised Plan will not revert to office use, even though office use is the only use recommended for this exact location, id. at 64-65 (unless and until the 1998 Sector Plan is amended). One of the key requirements of Preliminary Plan Approval is that the Plan substantially conform to the Master Plan (50.4.2.D.2.)--in this case (until

amended) the 1998 Friendship Heights Sector Plan, not the Sector Plan that GEICO thinks may result from the update process.

3. Both the residential and the office components of the Plan need fresh consideration.

With GEICO departing Friendship Heights, how the Property should be redeveloped needs fresh reexamination. As noted above, GEICO would like to see that process limited to 20% of the Project area, leaving the current plan for residential development elsewhere on the Property already determined, based on what seemed best 27-30 years ago. At present, unsurprisingly, there are many other, different ideas in the Friendship Heights community, and in the Village in particular, regarding that future vision. Plainly, that vision is best realized not with reliance on plans that have gathered dust while a new generation has taken its place in the Village and while notions of what are the best practices in planning and design in central business districts have rapidly evolved. There are many examples of cities and towns that have gone to great lengths to promote mixed-use, vibrant and walkable neighborhoods, open spaces and affordable housing since 1998. And there is hardly any better place than Friendship Heights, filled with professionals who are either active and experienced or retired and experienced, from which to draw community talent into the Sector Plan update process to apply these lessons learned locally and around the country to produce a new and better consensus plan for the Property.

4. Most critically in need of close reconsideration is the CR zoned portion of the Property.

The Property was zoned R-60 in its entirety before the rezoning called for in the 1998 Sector Plan. Thereafter, in rezoning G-760, 9.9 acres was rezoned TS-M and the remaining 16.6 acres R-60/TDR. Binding elements in the rezoning included record plat recordation of the area designated "Open space/ball field," the "Greenway," and the "Enlarged Brookdale Park," with the Park to be leased to M-NCPPC. In connection with the Council action in adopting the 2014 Zoning Ordinance, the TS-M zone was eliminated everywhere in the County, and in this instance the TS-M segment of the Property was redesignated as CR 3.0, C-2.0, R-1.0, H-100T. It appears to be generally agreed that this redesignation left the binding elements from the G-760 rezoning unchanged.

The CR zoning meant that the maximum residential use of the approximately 9.9 acres is 431,244 sq. ft., and the commercial use twice that, or 862,488 sq.

ft. The Preliminary Plan shows 810,000 sq. ft. of commercial space—about 94% of the allowed maximum. The floor area of the four multi-family buildings, all fronting on Willard Avenue, is uncertain, but with 300 units proposed, use of all of the R-1.0 allowance along Willard may be GEICO's intent, in that it would mean an average unit size (allocating all floor area to the dwelling units) of about 1435 sq. ft.

These numbers suggest that the "white hole" GEICO is proposing for the CR segment fronting on Friendship Boulevard will be problematic if Plan validity were extended. The numbers reveal that there is little if any residential allocation available to that area, and there is little reason to believe that floor area in the range of 18.5+ acres (810,000 sq. ft.) will be feasibly developed to that extent with non-office commercial use. Many Village residents looking into the details of what is proposed for the CR-zoned part of the Property want to see the current green space and specimen trees along Willard preserved, with the four multi-family buildings moved from Willard to Friendship. A consensus solution along these lines can no doubt be reached in the upcoming Sector Plan update process, which will also eliminate the current inconsistency of GEICO's proposed amendment to the Preliminary Plan with the current Sector Plan, as noted above. But extending Plan validity in the form GEICO has proposed simply prolongs, rather than resolves, the question of what will emerge from the "white hole" proffered by GEICO.

5. The newly amended NRI/FSD reveals major changes that must be taken into account in reviewing the Application.

When the Preliminary Plan was approved in 1999, it was based on a June 22, 1998 NRI/FSD (#419982760). That survey and the resulting Preliminary Conservation Plan showed the existence of 32 specimen trees on the Property, with plans to preserve 14 of them (a preservation rate of 43.75%). GEICO submitted an updated NRI/FSD in July, unsurprisingly revealing much tree growth on the Property since 1998. Of 203 trees with a DBH of more than 20", 112 are now specimen trees. If the preservation rate were to remain the same, it would mean preserving 49 specimen trees and the loss of 63. It is therefore foreseeable that a large number of specimen trees would need tree variance approval for removal or special protection, and that necessitates evaluation not just tree-by-tree, but quite possibly also in terms of the reasonableness of the overall layout of the buildings to determine if best efforts have been made at specimen tree preservation.

This is not a matter that is simply left for Site Plan review as to whether the trees interfere with building locations on a 26-year old plan. A fresh and new evaluation of specimen tree impact is required at the Preliminary Plan stage. Plan approval requires compliance with the Forest Conservation Law (50.4.2.D.4), and that Law provides that a Preliminary Forest Conservation Plan must be submitted, 22A-11(b)(2)(A), and that the Board may make compliance with it a condition of approval of the Plan 22A-11(b)(2)(C). The fact that there are so many specimen trees on the Property reinforces the need for evaluation of this issue when the Plan's validity period extension is under review.

6. The project delay for which GEICO is responsible remains at issue.

Of the three instances when GEICO sought Plan extensions from the Board (as opposed to the multiple automatic extensions), the earliest, for 3 years was granted without objection from any party, including staff. The second and third requests, made in 2009 (granted for 5 years, to 2010) and 2011 (for 6 years, to 2020) were opposed by staff but granted by the Board. In those cases, GEICO made progressively weaker cases for extension under the statutory criteria, but the Board was reluctant to penalize GEICO with voiding the Plan via extension denial. In both cases, GEICO successfully emphasized to the Board non-statutory considerations: the importance to GEICO and the benefit to the County of being allowed time to complete the multiple tasks of readying its HQ Property for development of a new HQ building on the Property following the demolition of the original HQ. In explaining the long delays in validating the Plan, GEICO sought refuge in the fact that it was in the insurance business, not the development business, and that it had encountered great difficulty in securing a development partner ready to undertake a plan where the most profitable part—adding housing—had to take a back seat to HO demolition and relocation on the Property, as required by the Plan.

At present, with GEICO undergoing HQ transfer from Friendship Heights to Bethesda, GEICO's heavy reliance on staying on the Property as justification for extraordinary delay is gone. But the steps GEICO has taken and failed to take over the past 30 years linger. They have revealed that GEICO's focus is and has always been on the business of GEICO, not on real estate development, and GEICO has provided no reason for the Board to believe this will change with its change of HQ locations. The relevance of this history to the extension request is manifest. The Board may deny the request "if it

finds the project, as approved and conditioned, is no longer viable. The Board must consider whether the project is capable of being financed, constructed, and marketed within a reasonable time frame." (50.4.2.H.4.b.) To date, GEICO's notion of a "reasonable time frame" appears to be something more than 30 years. If the Board were to bless this procrastination with a further extension, it would severely undermine the credibility of the Council-adopted process of short validity periods followed by short, truly warranted extensions.

Conclusion

The Village requests that the Staff recommend to the Board that the extension request be denied. In the Board agrees, this result will obviate the need to resolve all the collateral issues in the current GEICO application. They relate to the amendment of an outdated plan that GEICO has no intention of implementing in its present form and is in need of a thorough reexamination. Than can and should be done in the course of the Sector Plan update process now underway.

Response to Village of Friendship Heights Talking Points

The existing Preliminary Plan for the GEICO property was the result of extensive work by Park and Planning, the local community and the landowners reflected in the last Friendship Heights Sector Plan and the subsequent development approvals for the GEICO Property (Local Map Amendment, Development Plan and Preliminary Plan). The end result was dubbed the "Consensus Plan" because it was jointly supported after extensive review and compromise. Some wanted more development, others wanted less but everyone realized Friendship Heights would need to grow and evolve. The Village of Friendship Heights expressly supported the approvals for the GEICO property as well as the previous extension of the validity.

More recently, we have reached out to various fractions of the community, including the Village of Friendship Heights to seek their continued support. Unfortunately, the Village provided only a three-minute opportunity at a Village Council meeting to discuss the plan and then abruptly voted to oppose the plan it had previously supported. GEICO is disappointed but believes the underlying merits of the approved development are even stronger today than they were when it was first approved.

There is no doubt that Montgomery County wants Metro-oriented, walkable development in areas such as Friendship Heights. Advocates ranging from the County Council to the Planning Board to affordable housing proponents and others, as well as the Council of Governments and the state of Maryland continue to advocate for the provision of additional housing, particularly in urban areas like this where water, sewer and utilities exist as do roads and transit service and where environmental impacts are the most limited. The provision of park areas, open space and amenities that come with such redevelopment are equally desired. The economic benefits to the County from both the retention of GEICO as one of the largest County employers, and the ability to redevelop the existing GEICO property with uses that will generate significant tax benefits also are important. We believe the foundation for approval of the current application is as solid as any development application in the County.

The Village has raised several arguments which we would like to briefly rebut.

1. Compliance with Preliminary Plan Extension Provisions under Section 50.4.2.H.3.a. The Village asserts that the Preliminary Plan Amendment does not conform with the requirements for Preliminary Plan extension. We want to make it clear that this application has been submitted under other provisions of the subdivision regulations allowing for amendments to approved Preliminary Plans beyond just the validity. In this case, Applicant has reduced the area subject to the Preliminary Plan to the portion of the property where the approved residential development will be located. As reflected in the submission checklist provided by planning staff, this application conforms with the requirements for such a Preliminary Plan Amendment. The Statement of Justification, as well as the notes above, explain the justification for this amendment and the benefits of it, as well as the compliance with all applicable standards for the Preliminary Plan approval. GEICO anticipates conditions attached to the amendment to reflect future site design and other issues but requires this amendment as the first step.

- 2. <u>Information for the remainder of the property</u>. Friendship Heights objects to the fact that there are no specifics with respect to the portion of the property previously designated for office development. Again, Applicant has deleted this area from the application in order to facilitate appropriate consideration of its future use cooperatively with the County, local residents and others, starting with the Friendship Heights Sector Plan update. As such, it would be inappropriate to designate specific development plans for this portion of the property now.
- 3. <u>Fresh look</u>. The Village suggests that the entire property requires reexamination before any development should proceed. GEICO recognizes that the current state and county advocacy for more housing, at greater heights and densities, could well support even more development on the residential portion of the property than was previously approved. Nevertheless, given its pending relocation, GEICO believes the more appropriate approach is to proceed with the previously approved development on that portion of the property rather than waiting for years as would be required in connection with an update to the Sector Plan and any subsequent subdivision, zoning and Site Plan approvals that would then need to follow that Sector Plan.
- 4. Other. GEICO anticipates addressing any environmental issues related to trees or other site features through the development approval procedures that will follow this Preliminary Plan Amendment. As noted above, Applicant also anticipates active engagement with planning staff, the community and others with respect to the best plan for the area of GEICO property, previously planned for major office development. This is likely to include uses more consistent with current County requirements, and design features reflective of evolving community interests.