

**Patricia A. Harris, Esq.**  
(301) 841-3832  
[paharris@lerchearly.com](mailto:paharris@lerchearly.com)

January 12, 2026

Via Electronic Mail

City of Rockville Planning Commission  
111 Maryland Avenue  
Rockville City Hall  
Rockville, MD 20850

Re: Rollins Park – Comments on Draft Zoning Ordinance

Dear Chair Espinosa and Members of the Planning Commission:

On behalf of Congressional Towers and Rollins Park partnerships, the owner (“Owner”) of the 51.92-acre Rollins Park community in the northwest quadrant of the Rollins Avenue and East Jefferson Street intersection (the “Property”), we want to express to you our strong support for Planning Staff’s alternative proposal for the zoning of the Property and the accompanying development standards as set forth in the January 7, 2026 Staff Report (the “Alternative Proposal”).

The Alternative Proposal strategically furthers a number of the City’s most important objectives by:

- Protecting the existing single-family neighborhoods
- Incentivizing the redevelopment of the Property to provide more needed housing
- Concentrating the height and density on the Property to the most northern areas
- Ensuring the preservation of the community center

## **I. Introduction and Background**

Staff’s Alternative Proposal proposes the MXCT Zone for the eastern portion of the Property fronting East Jefferson Street for a width of 200 feet; retention of the RMD-25 Zone for the southern portion of the Property from Rollins Avenue north to Halpine Road extended (a depth of approximately 400 feet); retention of the R-75 Zone for the 5.3 acre portion of the Property devoted to the community center (containing a pool and clubhouse); and the residential high density (RHD) Zone for the remaining portions of the Property (the “Proposed Zoning”) (Attachment “A”). Staff’s Alternative Proposal for the RHD Zone Development Standards allows for a density of 100 units per acre and a maximum height of 150 feet.

As explained below, the Property is uniquely positioned to help address the City’s housing shortage – an issue that is well recognized by the Mayor and Council and the Planning Commission. As the only site within the City designated for the RHD Zone, there is the opportunity to establish development standards that are consistent with the Comprehensive

Plan's recommendation for high residential density, while at the same time respecting the surrounding existing neighborhood development and preserving the treasured open space.

By way of brief background, the majority of the Property is currently zoned RMD-25 and was developed in the early 1960's with a variety of garden apartments, townhouses, and four seven-story multi-family buildings that are located along the northern boundary of the Property. The Property includes the 5.3-acre portion of the Property zoned R-75 that was originally a pool complex only but which the Owner redeveloped in 2008 to include rebuilt pools, a fitness center and multi-purpose community space. The existing density community wide is 25 units per acre. While the Owner continues to invest in the development, the reality is that all buildings have a useful life, and at some point in the next five to twenty years, a phased redevelopment of the Property will be necessary to offset functional obsolescence and maintain market demand.

## **II. The Alternative Proposal Provides the Needed Financial Incentive to Support the Redevelopment of the Property**

We embrace the Alternative Proposal because it provides the necessary financial incentive to support the redevelopment of the Property and bring more needed housing to the City. To further expand on this, the existing residential development is an income producing asset for the Owner. As such, in order to take existing development off-line (in a phased manner) for two to three years to redevelop to densities that help the City meet its housing goals, the return on investment needs to be financially viable. The Draft Zoning Ordinance's initial recommendation for the RHD Zone of a maximum of 50 units per acre simply does not provide the necessary financial incentive and given various factors, including the cost of construction, the only redevelopment that likely would have occurred under the initially proposed 50 units per acre development standard is townhouse development. While there is a place for a portion of the Property to be redeveloped with townhouses, the wholesale redevelopment of the Property with townhouses would fail desperately in furthering the City's goal of more housing and would result in a *net decrease* of the number of residential units on the Property.<sup>1</sup> Thus, we are pleased to see the Alternative Proposal which, contrary to the initial proposal, is economically viable.

## **III. Community Center**

We understand that the preservation of the existing green space and community center on the Property is very important to the surrounding community and therefore we support the Alternative Proposal to preserve this community amenity. The retention of the community center for the benefit of the neighborhood is consistent with the Owner's past practices, which included as part of the original development of the Property, the dedication to the City of a 5.7 acre parcel which became Montrose Park.

Montrose Park and the community center account for approximately 20 percent of the overall Property and represent a significant amenity to the surrounding community. The Owner recognizes the importance of the open space to both the Rollins Park residents and the broader

---

<sup>1</sup> Even under a dense urbanized townhouse layout, the typical yield is only 20 units per acre.

community and in this regard is supportive of preserving the community center and associated open space, despite the significant cost to the Owner to maintain the community center. The current community center is classified as an “accessory swimming pool” which allows memberships to the broader community. It is important that the new Zoning Ordinance continue to allow this in order that the broader residential community may continue to benefit from this amenity.

#### **IV. Concept Plan**

The Property is located in a transitional area with the proposed high intensity MXTD Zone allowing heights up to 200 feet and no prescribed density located immediately to the east across East Jefferson Street; the 457-acre Woodmont County Club located to the north; and Montrose Park and the community center to the west. To the south and west of Montrose Park and to the south of Rollins Avenue are the single-family neighborhoods that were developed by the Owner.

The Alternative Proposal would accommodate a redevelopment plan that concentrates the highest densities and heights along the northern boundary of the Property adjacent to the country club in high rise multifamily buildings, with heights and densities decreasing as the development moves to the east and to the south from moderate (six to seven-story housing) to four stories, in order to ensure compatibility with the existing single family residential development. Moreover, the proposed front setback standard for the RMD-25 Zone ensures that the heights within a minimum of 100 feet<sup>2</sup> of the single family residences will not exceed 45 feet in height.

#### **V. The Alternative Proposal is Consistent with the Comprehensive Plan**

The Alternative Proposal is wholly consistent with the recommendations of the City’s 2021 Comprehensive Plan which recommends CRM (Commercial and Residential Mix) for the East Jefferson frontage of the Property and RM (Residential Multiple Unit) for the balance of the Property. The Plan further provides:

In designating the majority of the Property RM, the Comprehensive Plan notes: “A new higher-density residential zone, limited to residential uses, is appropriate for the remainder of the site to permit new investment and upgrades, though it should not result in residential displacement.”

The Alternative Proposal will allow for the redevelopment of the Property in a manner wholly consistent with the Urban Design recommendations of the Comprehensive Plan which provide:

Any redevelopment should include a mix of housing types: high-rise apartments overlooking the golf course and a mix of low- to medium-height buildings that feature appropriate transitions between the new community and the adjacent single-unit detached homes on Rollins Avenue and Martha Terrace.

---

<sup>2</sup> 25 foot setback provided by the RMD-25 Zone development standards plus the 75 foot right-of-way width of Rollins Avenue.

## VI. Justification

The Property is located in a transit rich location. The Twinbrook Metro Station is less than 2,000 feet to the east, a straight walk down Halpine Avenue.<sup>3</sup> In addition, the Bus Rapid Transit is located just a block away on Rockville Pike and the Property is served directly by Ride-On buses 5 and 26 that provide very convenient access from the Twinbrook Metro Station and through the Rollins Park community (Attachment “B”).

The location of the Property west of Rockville Pike addresses concern expressed by the Mayor and Council that new development needs to be spread more evenly throughout the City and not concentrated to the east of Rockville Pike. At the same time, the Alternative Proposal secures the Property as a transitional development between the much more intensive development located immediately to the east (the majority of Congressional Plaza is proposed for MXTD zoning with a maximum height of 200 feet) to the lesser intensive development to the west.

While the Property does not have frontage on Rockville Pike, it most certainly is part of the Rockville Pike corridor. Residents of the Property need only cross East Jefferson Street to begin to avail themselves of the generous amount of retail, commercial uses and services located along Rockville Pike, starting with Congressional Plaza and extending to the north, south and east. The Property is only 1,000 feet (less than ¼ of a mile) from Rockville Pike and provides the opportunity for meaningful housing just west of the Pike.

The single-family residences to the south of the Property are buffered from any potential redevelopment on the Property by virtue of the 75-foot Rollins Avenue right-of-way, Martha Terrace, the community center and Montrose Park. The retention of the RMD-25 along the southern portion of the Property provides a very generous buffer, such that the single-family homes on Rollins Avenue are approximately 475 feet – a distance considerably greater than the length of a football field, from any height more than 75 feet. Moreover, the Property is located to the north of the single-family homes, ensuring that the development will not shade or shadow the existing residential development.

In addition, when considering the Alternative Proposal, it is important to emphasize that approximately 25 percent of the Property is *not* being rezoned to the RHD Zone but rather retained in either the RMD-25 Zone (8 acres) or the R-75 Zone (5.3 acres).

Finally, the Property is located on a prominent corner; it is not imbedded within an existing community where access is limited. Instead, the location of the Property in the northwest quadrant of East Jefferson Street and Rollins Avenue and the existing presence of Congressional Lane to the west of the majority of the Property allows for the establishment of a desired urbanized street grid, with multiple access points to the development. The result is the creation of a finer grained community which is a preferred urban design approach over the maintenance of mega-blocks.

---

<sup>3</sup> By way of comparison, the pending Comprehensive Map Amendment proposes the MXTD Zone with heights of 200 feet for properties located up to 4,500 feet away from the Rockville Metro Station.

## VII. Requested Consideration of Modification

As stated, we embrace the Alternative Proposal but believe that the redevelopment of the Property would be further enhanced by relocating the zoning line between the RMD-25 and the RHD Zones approximately 200 feet further to the south and limiting the height in the RHD Zone to 75 feet for areas located within 200 feet of the RMD-25 Zone, as indicated on Attachment C. Critically, this modification will maintain the same height restrictions as the Alternative Proposal, thus ensuring a compatible relationship with the single-family areas to the south. In addition, the modification will provide the opportunity for additional units in the most northern portions of the Property, thus allowing a portion of the density that is foregone by virtue of the retention of the community center as a public amenity, to be recouped. More specifically, the Comprehensive Map Amendment as originally drafted proposed rezoning the 5.3 acre community center to the RHD Zone. Even at 50 units per acre as originally proposed, the community center would have supported 265 residential units, whereas the proposed shifting of the zoning line would accommodate a fraction of these units – approximately 150 units. This request is made in part given the costs associated with the retention, maintenance and operation of the community center.<sup>4</sup> We appreciate the Commission's consideration of this modification.

## VIII. Conclusion

The Alternative Proposal for the Property provides the opportunity to help the City address its housing needs. Accordingly, we want to express our appreciation to the Planning Staff for their recommendation and encourage the Planning Commission to support the Alternative Proposal and further consider our requested modification.

We look forward to testifying at the Planning Commission's hearing on January 14, 2026 and thank you in advance for your consideration.

Sincerely,



Patricia A. Harris

cc: Mr. Craig Simoneau  
Ms. Holly Simmons  
Mr. Jim Wasilak Mr.  
Kenneth Becker Mr.  
Arnold Polinger Mr.  
Anthony Rakusin

Encls.

---

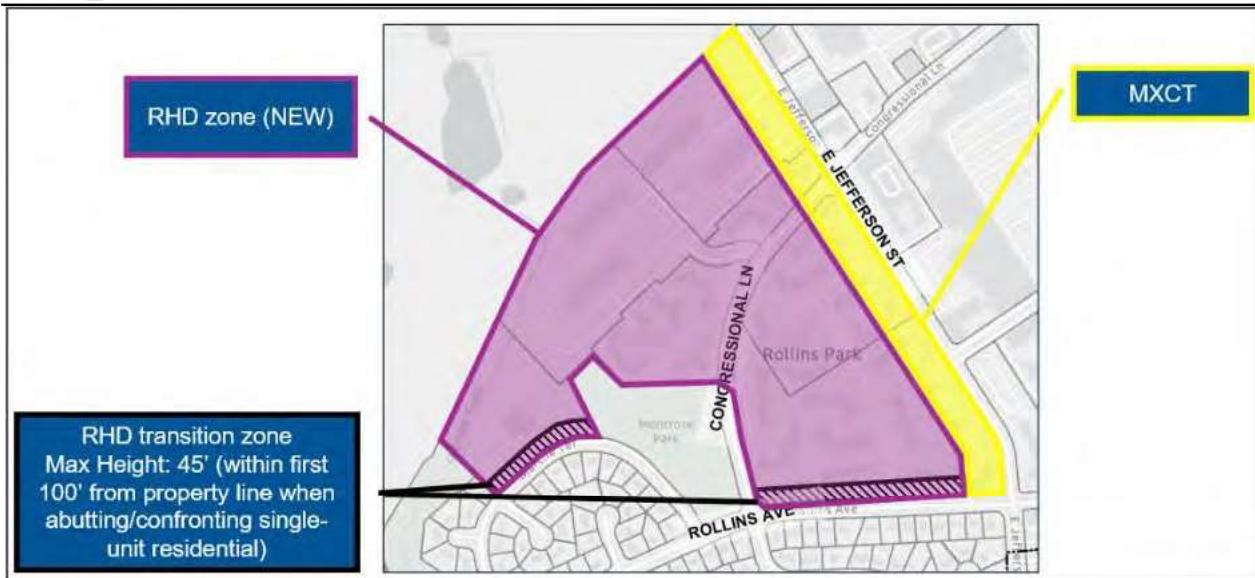
<sup>4</sup> By way of example, in 2008 the Owner spent more than \$7.5 million to refurbish the community center.

ATTACHMENT A

Staff Alternative

Proposal

FIGURE 2. STAFF DRAFT CMA PROPOSAL



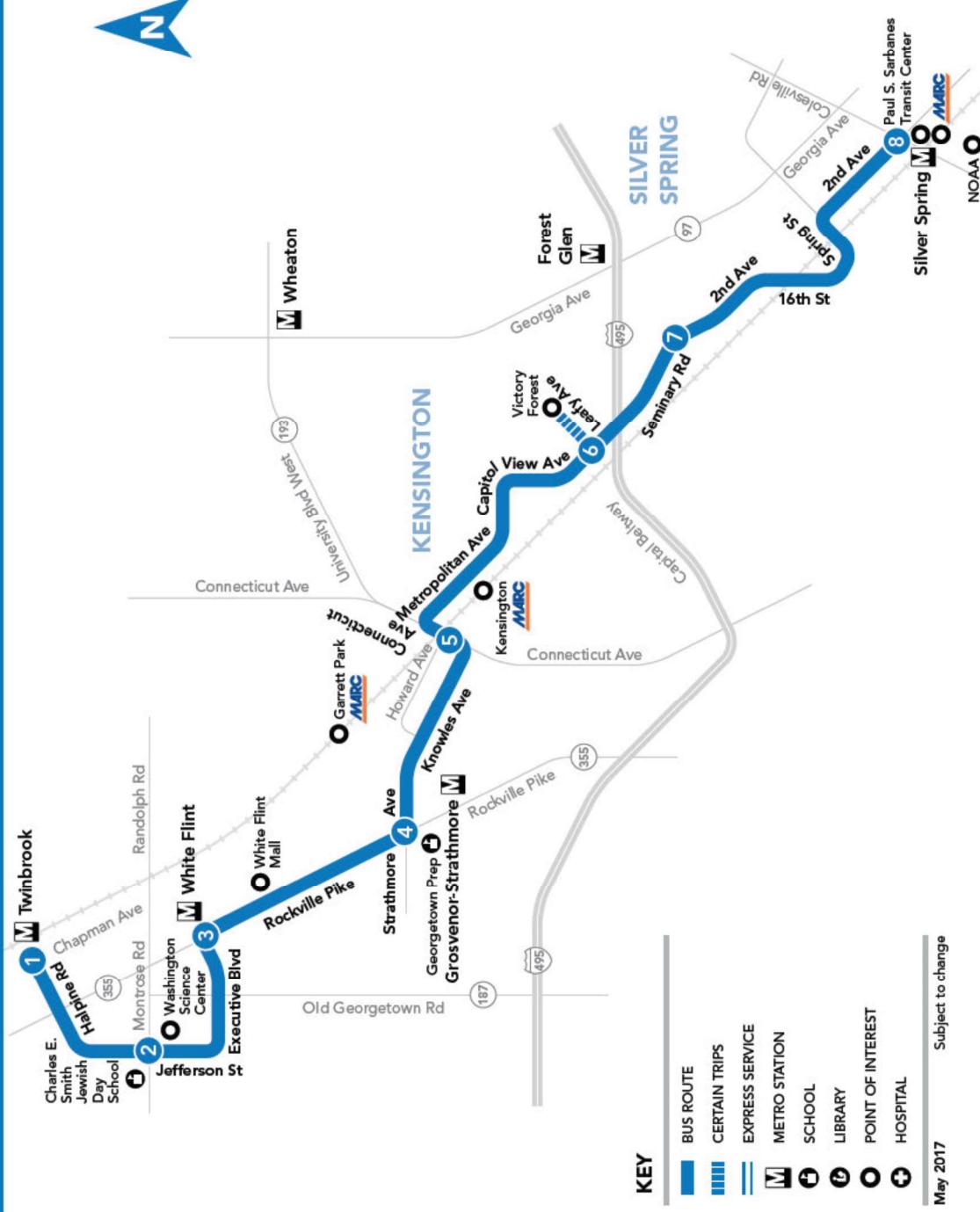
ATTACHMENT B

Ride On Routes

**Ride On**  
Montgomery County Transit

Montgomery County Transit

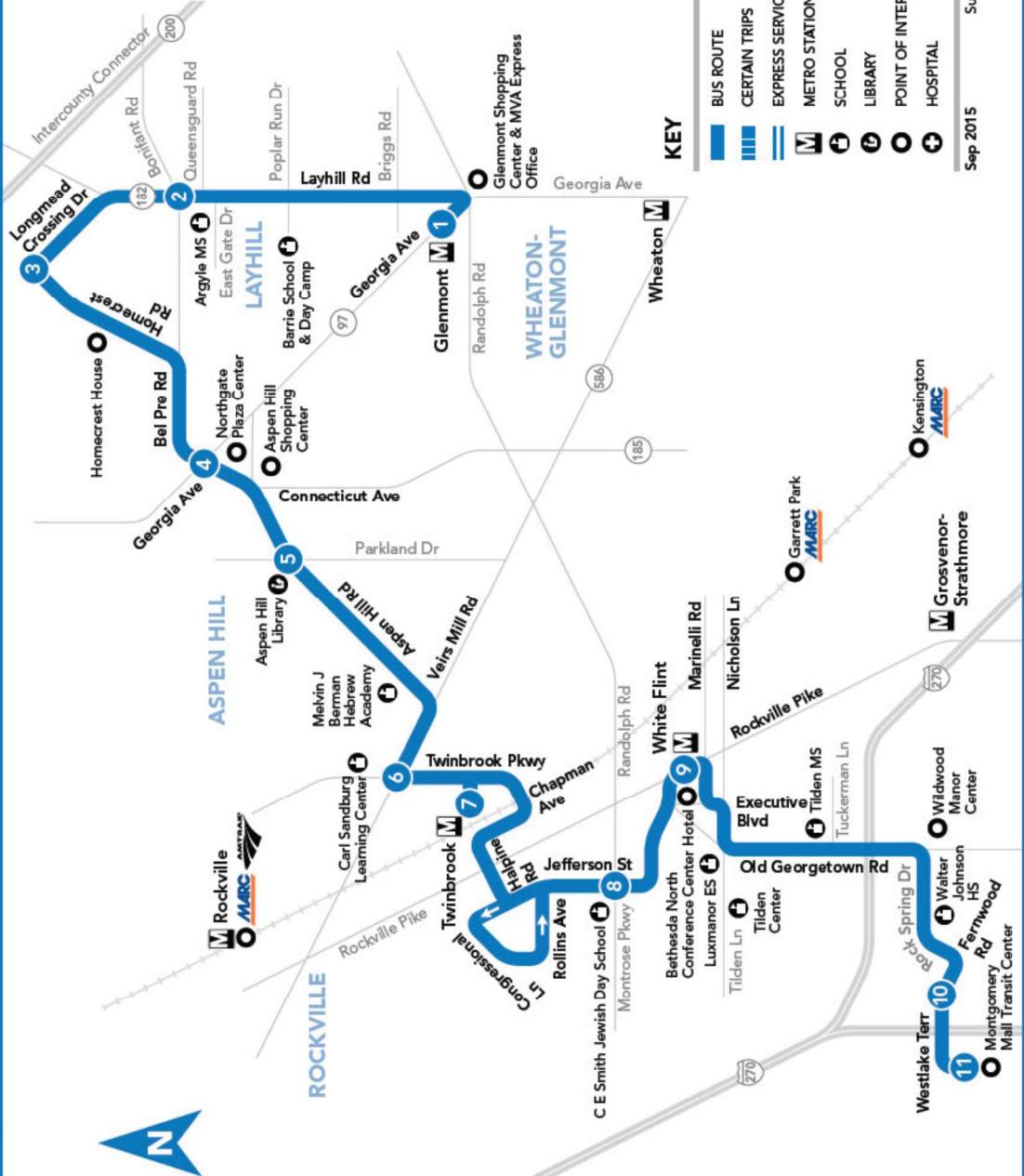
Twynbrook **W** – White Flint **W** – Grosvenor-Strathmore **W** –  
Garrett Park – Kensington – Paul S. Sarbanes TC (Silver Spring **W**)



26

Glenmont **M** – Aspen Hill – Wheaton Woods – Twinbrook **M** –  
White Flint **M** – Montgomery Mall Transit Center

**Ride On**  
Montgomery County Transit



ATTACHMENT C  
Rollins Park Proposed Modification

# Alternate Proposal

RHD Density: 100 DU/acre

MXCT

Max Height: 150

Retain R-75

Retain RMD-25

