

From: [Cnty 2025 Comp Plan](#)
To: heather@si-ellen.com
Cc: [Oliver Orjiako](#); [Jose Alvarez](#); [Rebecca Messinger](#)
Subject: FW: Mike Roth Testimony
Date: Monday, April 27, 2026 1:21:00 PM
Attachments: [Mike Roth.pdf](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Good day, Mike,

Thank you for submitting these comments regarding the Council Hearing to select the Preferred Alternative for the 2025 Comprehensive Plan.

I am forwarding to additional members of Staff ahead of today's Hearing. This will also be added to the Index of Record.

Best regards,




Jeff Delapena
Program Assistant
COMMUNITY PLANNING

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From: Heather Hilarides <heather@si-ellen.com>
Sent: Monday, April 27, 2026 12:31 PM
To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>
Cc: Rebecca Messinger <Rebecca.Messinger@clark.wa.gov>
Subject: Mike Roth Testimony



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To: Clark County Council and Planning Commission Subject: Site-Specific UGB Request – Parcel 115621190 & Adjacent Properties Date: April 27, 2026

Dear Councilors and Commissioners,

My name is **Mike Roth**, and I am writing to request the inclusion of Parcel 115621190

When we look at land use planning, we must look at what is actually on the ground today. By every practical and legal definition, this property is already characterized by urban growth.

Right across the street, the land is zoned R-16 and R-17.5 for medium-to-high density urban housing. Directly to our south, there are fully built urban subdivisions. This property is not a remote rural outpost; it is an urban peninsula surrounded by city density. Under the Washington State Growth Management Act (RCW 36.70A.170), land cannot be designated as agricultural or long-term rural if it is already characterized by urban growth. It defies state law and basic common sense to pretend this parcel is anything other than urban.

The public investments have already been made here. We have public water and NW Natural gas already in the street, and public sewer is located just to the South and East. The county is currently undertaking major multi-million-dollar road improvements on Ward Road to handle urban traffic. Furthermore, the Hockinson School District has two new schools coming to serve this exact area. If we want those schools to be successful, we need to provide housing near them so kids can walk or take short drives, rather than adding to regional traffic congestion.

We are not just asking for a boundary line change; we are offering a partnership. We fully support the proposed Transfer of Development Rights (TDR) program as the tool to make this happen. If you approve this site-specific request and bring us into the UGB, we are prepared to accept an Urban Holding overlay. We commit to finding a qualifying Agricultural sending site to purchase TDR credits from to lift that overlay. However, we can only provide this conservation funding if the policy is grounded in economic reality. We need the County to adopt a strict **1:1** TDR ratio. If you penalize the program by demanding a 3:1 or 4:1 ratio, the development math completely fails. The housing won't get built near our new schools, the Ward Road infrastructure will be underutilized.

We have the infrastructure in the ground. We have the legal mandate under the GMA. And we have a developer willing to fund a 1:1 TDR transaction to make it happen.

I respectfully ask that you bring Parcel 115621190 and its adjacent lands into the Urban Growth Boundary and establish a 1:1 TDR ratio so we can get to work.

Thank you for your time.

Sincerely, Mike Roth