

**CLARK COUNTY WASHINGTON****PUBLIC WORKS****MEMO**

To: Jose Alvarez, Planner III, Clark County Community Planning,

CC: Robert D. Klug, P.E., Acting County Engineer, Clark County Public Works

From: Gary Albrecht, Planner III, AICP, Clark County Public Works Transportation

Date: November 12, 2021

Subject: CPZ2021-00006 Chelatchie Rezone Transportation Analysis

Introduction

This report provides a transportation analysis of the Chelatchie Bluff Mineral Lands request to amend the comprehensive plan and zoning maps to apply the Surface Mining Overlay (SMO). The report identifies the likely localized and general transportation impacts and shows how applicable adopted transportation policies have or have not been met by the applicant's proposal. Subsequent development will need to comply with applicable county development regulations, including standards governing the design of access and those that ensure transportation system concurrency.

Requested Amendment

The applicant is requesting to amend the comprehensive plan and zoning map to apply the Surface Mining Overlay (SMO) to approximately 330.95 acres of land within the Forest 80 (FR-80) zoning and Forest Tier 1 (FR-1) comprehensive plan designation on 4 parcels (274346000, 283421000, 283422000, and 283420000), see map in Exhibit 1. The subject site is in rural Clark County adjacent to the Chelatchie Prairie Rural Center on Northeast 424th Street and Northeast Belvins Road that are both classified as a private road. Significant regional intersections include State Route (SR) 503 and Northeast Healy Road. Northeast Healy Road is classified as a Rural Minor Collector. SR 503 is classified as a State Route under the jurisdiction of Washington State Department of Transportation (WSDOT).

The property is generally bounded by Northeast 424th Street and Northeast Belvins Road to the north. The properties have site access through Northeast 424th Street and Northeast Belvins Road. Staff reviewed the 2021-2026 Transportation Improvement Program and found no existing projects that would impact the area immediately around the site of the proposed comprehensive plan amendment and zone change.

Transportation Analysis

A transportation analysis is required per Clark County Code (CCC) 40.560.040.A.2.c.6. Transportation analysis is defined in CCC 40.100.070 (Definitions) as a study done by a licensed engineer that compares a build-out scenario under the existing and proposed designations for a twenty (20) year horizon.

The applicant is Granite Construction Company that hired Kittelson & Associates to perform a Surface Mining Overlay Transportation Analysis.

The analysis compares a build-out scenario under the existing zoning to build-out under the proposed SMO, analyzing trip generations, modal split and distribution for a current Comprehensive Planning twenty (20) year horizon. The analysis includes a volume to capacity ratio (V/C) on the NE Healy Road between Northeast 424th St and SR 503, and a level of service analysis for the unsignalized intersection at Northeast Healy Road and SR 503.

Unsignalized Intersections

Access for this proposed amendment is near an unsignalized intersection of regional significance, SR 503 and Northeast 424th St.

CCC 40.350.020.G.1.c: "All unsignalized intersections of regional significance in the unincorporated county shall achieve LOS E standards or better (if warrants are not met). If warrants are met, unsignalized intersections of regional significance shall achieve LOS D standards or better. Intersection control or mitigation of unsignalized intersections shall be at the discretion of the Public Works Director and shall not obligate the County to meet this LOS standard. However, proposed developments shall not be required to mitigate their impacts in order to obtain a concurrency approval unless:

- (1) "The proposed development adds at least five (5) peak hour trips to a failing intersection approach; and
- (2) "The worst movement on the failing approach is worsened by the proposed development. In determining whether the movement is worsened, the Public Works Director shall consider trip volume, delay, and any other relevant factors."

WSDOT Operating Standards

The SR 503/NE Healy Road intersection is maintained by WSDOT. WSDOT provides a table of LOS standards for state highways of statewide significance (HSS) based on Revised Code of Washington (RCW) 47.06.140(2). Table 1 presents the WSDOT standards for state facilities in Clark County.

Table 1. WSDOT Level of Service Standards for Washington State Highways

Regional Organization/County	LOS for Non-HSS ¹		LOS for HSS ¹	
	Urban	Rural	Urban	Rural
(RTC) Southwest Washington Regional Transportation Council – TMA/MP/RTPO - Clark County	E	C	D	C

¹ HSS = Highway of Statewide Significance

[Kittelton & Associates Chelatchie Bluff Mineral Lands Project, page 5].

Chelatchie is a rural community, and SR 503 is not a highway of statewide significance. Therefore, the SR 503/NE Healy Road intersection will be evaluated to an LOS C standard.[Kittelton & Associates Chelatchie Bluff Mineral Lands Project, page 5].

Summary of Transportation Impact Finding

The transportation impact analysis provided by the applicant for Granite Construction Company demonstrates that adding the Surface Mining Overlay to these four properties is consistent with county transportation policies, see Exhibit 2. The applicant's transportation impact analysis concluded that the proposed land use change would not significantly impact the transportation system. The transportation impact analysis shows that:

- The existing zoning buildout is expected to generate 38 daily trips, 3 morning peak hour (1 ingress, 2 egress), and 4 evening peak hour (3 ingress, 1 egress) net new trips. [Kittelton & Associates Chelatchie Bluff Mineral Lands Project, page 14]. The morning and evening peak hours were found to occur from 8:00 to 9:00 AM and 4:30 to 5:30 PM, respectively.
- The proposed surface mining overlay change is expected to add an additional net difference of 324 more daily trips, 45 more morning peak hour (25 additional ingress, 20 additional egress), and 15 more evening peak hour (3 fewer egress, 18 additional egress) net new trips per day. [Kittelton & Associates Chelatchie Bluff Mineral Lands Project, page 14].



Potential trips associated with future reasonable worst-case site development were estimated using trip rates obtained from *Trip Generation Manual, 10th Edition* (Institute of Transportation Engineers (ITE), 2017). Given a lack of information on mining operations in the *Trip Generation Manual*, trip generation estimates for the reasonable worst-case development scenarios with the proposed SMO were developed based on programmatic information provided by Granite Construction.

WSDOT has reviewed and evaluated Kittelson & Associates transportation analysis prepared for Granite Construction Company. On November 8, 2021, WSDOT has indicated that the trip generation, distribution, growth rate and COVID correction factor assumptions appear reasonable¹.

Proposed SMO Development Scenario

CCC 40.250.022 provides that, in addition to the allowed uses in the underlying zoning district, permitted uses in the proposed SMO district include temporary offices, shops or other accessory buildings and structures and short-term stockpiling of extracted materials. Conditional land uses in the proposed SMO district include mineral extraction, asphalt mixing, concrete batching, clay bulking, and rock crushing. As indicated in the applicant's analysis, based on a review of potential land uses, mineral extraction is expected to be the reasonable worst-case development scenario under the existing zoning to build-out under the proposed SMO, analyzing trip generations, modal split and distribution for a current Comprehensive Planning twenty (20) year horizon.

Transportation Concurrency Management System (CCC 40.350.020) refers to the adopted 2008 Administrative Manual that includes review guidelines for Traffic Reports. The guidelines indicate that trip generation rates should be for a worst-case scenario. A worst-case scenario evaluates the transportation trips that result from the most intensive land use allowed by the Comprehensive Plan designation and/or zoning.

The applicant, Granite Construction, plans to extract approximately 1.3 million tons of material from the site each year. Granite's preferred scenario is to move 1 million tons of material by rail and the remaining 300,000 tons of material by truck. However, Clark County staff have expressed concerns about the potential use of the rail. Therefore, based on discussions with Granite and Clark County staff, this analysis includes an evaluation of two scenarios with the proposed SMO:

- **Applicant's Preferred Scenario:** Granite will extract 1.3 million tons of material from the site each year; 1 million tons will be hauled by rail and 300,000 tons will be hauled by truck.
- **Assumed Worst-Case Scenario:** Granite will extract 1.3 million tons of material from the site each year; all 1.3 million tons will be hauled by truck.

It should be noted that Granite representatives indicate that this assumed worst-case scenario is not feasible for their desired operations and would not be pursued. This scenario is analyzed at the request of Clark County staff for illustrative purposes only to document the potential truck trip implications that might occur if a mine operation is serviced exclusively by trucks.

Given a lack of information on mining operations in the *Trip Generation Manual*, trip generation estimates for the reasonable worst-case development scenarios with the proposed SMO were developed based on programmatic information provided by Granite. [Kittelson & Associates Chelatchie Bluff Mineral Lands Project, page 13].

All roadways in the site vicinity are two-lane facilities with no sidewalks, bike lanes, nor on-street parking as listed in Table 2. The mode split for the twenty (20) year horizon is likely to remain single occupant vehicles. However, the Chelatchie Prairie trail is proposed on the northern side of the property, parcel 274346000. When the 33-mile Chelatchie Prairie is built at some unknown time in the future, employees could potentially ride to work on this trail.

¹ Logan Cullums, AICP Land Use Planner WSDOT Southwest Region



Table 2. Existing Transportation Facilities and Roadway Designations.

Roadway	Functional Classification ¹	Number of Lanes	Posted Speed (MPH)	Sidewalks	Bicycle Lanes	On-Street Parking
SR 503 (NE Yale Bridge Road)	State Route	2	50	No	No	No
NE Healy Road	Rural Minor Collector	2	Not posted	No	No	No
NE 424 th Street	Private Road	2	Not posted	No	No	No
NE Belvins Road	Private Road	2	Not posted	No	No	No

¹ Source: Clark County Arterial Atlas (Reference 2)

[Kittelsohn & Associates Chelatchie Bluff Mineral Lands Project, page 5].

Table 3 summarizes the anticipated number of trips generated with the proposed SMO under Granite's preferred scenario compared to the anticipated number of trips under the existing (FR-80) zoning. As shown, the proposed SMO with Granite's preferred scenario results in a net increase of 74 daily trips, including eight trips during the weekday AM peak hour and 8 trips during the weekday PM peak hour.

Table 3. Trip Generation Comparison – Applicant's Preferred Scenario

Land Use	Daily Trips	Weekday AM Peak Period			Weekday PM Peak Period		
		Total	In	Out	Total	In	Out
Existing Zoning (FR-80)							
Single-Family Detached Housing (4 Dwelling Units)	38	3	1	2	4	3	1
Proposed SMO Overlay							
Surface Mining Overlay (Preferred Scenario)	112	11	6	5	12	0	12
Net Difference (Proposed-Existing)	74	8	5	-3	8	-3	11

[Kittelsohn & Associates Chelatchie Bluff Mineral Lands Project, page 14].

Table 4 summarizes the anticipated number of trips projected to be generated with the proposed SMO under the assumed worst-case scenario compared to the anticipated number of trips under the existing (FR-80) zoning. As shown, the proposed SMO with the assumed worst-case scenario results in a net increase of 324 daily trips, including 45 trips during the weekday AM peak hour and 15 trips during the weekday PM peak hour. A single family residential dwelling unit averages 9.44 daily trips. (ITE code 210).

Table 4. Trip Generation Comparison – Assumed Worst-Case Scenario

Land Use	ITE Code	Size	Daily Trips	Weekday AM Peak Hour			Weekday PM Peak Hour		
				Total	In	Out	Total	In	Out
Existing (FR-80) Zoning									
Single Family Home	210	4 dwelling units	38	3	1	2	4	3	1
Proposed SMO Overlay									
Granite Mining Operation	N/A	1,300,000 tons by truck	362	48	26	22	19	0	19
Net Difference (Proposed Minus Existing)			324	45	25	20	15	-3	18

[Kittelsohn & Associates Chelatchie Bluff Mineral Lands Project, page 14].

Year 2041 total traffic volumes were compared with adopted Clark County capacity thresholds for corridor segments to assess compliance with concurrency requirements.



Table 5 summarizes the year

2041 total bi-direction traffic volumes projected on NE Healy Road during the weekday AM and PM peak hours for each total traffic scenario and reports the V/C ratio along with the single direction roadway capacity. As shown, eastbound and westbound volumes on NE Healy Road, east of SR 503, meet the County's capacity thresholds.

Table 5. Trip Generation Comparison – Assumed Worst-Case Scenario

Count Location	Road Classification ¹	Single Direction Capacity/Hour ²	Maximum Volume (vph) ³		V/C Ratio	
			AM Peak Hour	PM Peak Hour	AM Peak Hour	PM Peak Hour
NE Healy Road, east of SR 503 (WB)	Rural Minor Collector (Rm-2)	600 ⁴	36	45	0.06	0.07
NE Healy Road, east of SR 503 (EB)			31	83	0.05	0.14

1 Source: Clark County Arterial Atlas

2 Per Clark County Code: For roadways not fully built-out to county standards, the capacity shall be determined based on the current roadway condition. For roadways with lane widths twelve (12) feet and greater, and with paved shoulder widths two (2) feet and greater, the lane capacity shall be eight hundred (800) vehicles per hour. For roadways with lane widths between eleven (11) and twelve (12) feet and with paved shoulder widths two (2) feet and greater, the lane capacity shall be seven hundred (700) vehicles per hour. For roadways with lane widths less than eleven (11) feet, the lane capacity shall be six hundred (600) vehicles per hour.

3 vph: vehicles per hour, based on turning movement counts collected at the study intersection.

4 Based on existing 2-lane cross-section [Kittelson & Associates Chelatchie Bluff Mineral Lands Project, page 11].

The applicant's transportation analysis shows a majority of traffic is expected to travel to-from the south on SR 503. It is assumed that virtually all truck trips will travel to/from the south on SR 503 to serve the Clark County market whereas some employees may travel to/from the north. As a result, 95 percent of site-generated trips are expected to travel to/from the south on SR 503, with the remaining 5 percent are expected to travel to/from the north, Figure 1.

Figure 1

The applicant analyzed Year 2041 total traffic volumes and compared them with adopted Clark County capacity thresholds for corridor segments to assess compliance with concurrency requirements.

Table 6 summarizes the year 2041 total bi-direction traffic volumes projected on NE Healy Road during the weekday AM and PM peak hours for each total traffic scenario and reports the V/C ratio along with the single direction roadway capacity. As shown, eastbound and westbound volumes on NE Healy Road, east of SR 503, meet the County's capacity thresholds. [Kittelson & Associates Chelatchie Bluff Mineral Lands Project, Memorandum March 15, 2021, page 16].

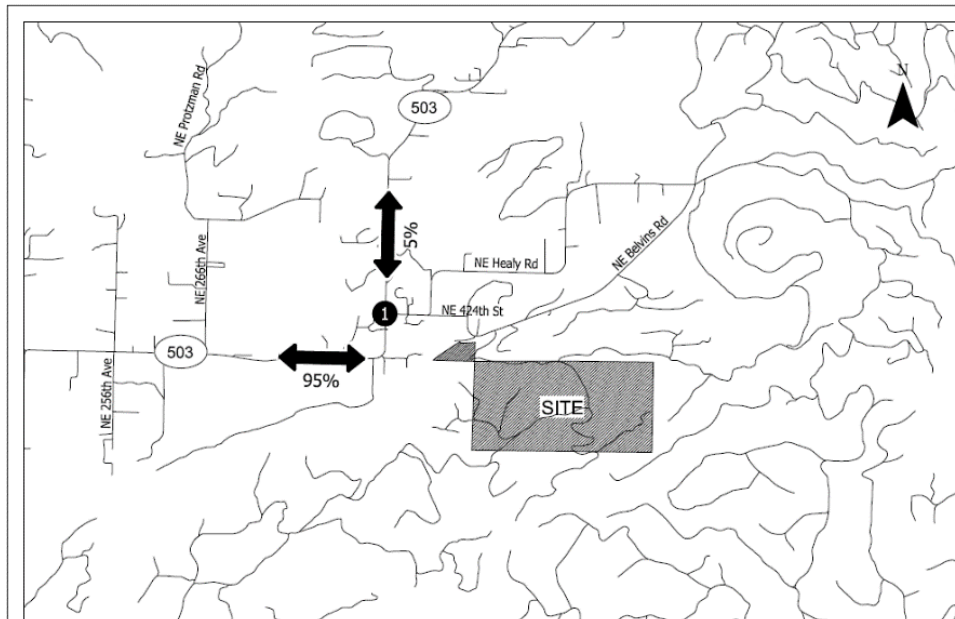


Table 6. 2041 Total Traffic Volumes and Roadway Capacities

Count Location	Road Classification ¹	Single Direction Capacity/Hour ²	Maximum Volume (vph) ³		V/C Ratio	
			AM Peak Hour	PM Peak Hour	AM Peak Hour	PM Peak Hour
FR-80 Zoning						
NE Healy Road, east of SR 503 (WB)	Rural Minor Collector (Rm-2)	600 ⁴	38	46	0.06	0.08
NE Healy Road, east of SR 503 (EB)			32	86	0.05	0.14
SMO Preferred						
NE Healy Road, east of SR 503 (WB)	Rural Minor Collector (Rm-2)	600 ⁴	41	57	0.07	0.09
NE Healy Road, east of SR 503 (EB)			37	83	0.06	0.14
SMO Worst-Case						
NE Healy Road, east of SR 503 (WB)	Rural Minor Collector (Rm-2)	600 ⁴	58	64	0.10	0.11
NE Healy Road, east of SR 503 (EB)			57	83	0.10	0.14

¹ Source: Clark County Arterial Atlas

² Per Clark County Code: For roadways not fully built-out to county standards, the capacity shall be determined based on the current roadway condition. For roadways with lane widths twelve (12) feet and greater, and with paved shoulder widths two (2) feet and greater, the lane capacity shall be eight hundred (800) vehicles per hour. For roadways with lane widths between eleven (11) and twelve (12) feet and with paved shoulder widths two (2) feet and greater, the lane capacity shall be seven hundred (700) vehicles per hour. For roadways with lane widths less than eleven (11) feet, the lane capacity shall be six hundred (600) vehicles per hour.

³ vph: vehicles per hour, based on turning movement counts collected at the study intersection.

⁴ Based on existing 2-lane cross-section

[Kittelson & Associates Chelatchie Bluff Mineral Lands Project, page 17].

Intersection Turn Lane Needs

The need for left-or right turn lanes on SR 503 at NE Healy Road was evaluated utilizing the turn lane guidelines presented in the *WSDOT Design Manual* (Reference 7). This analysis found that that the projected 2041 turning movements volumes at the intersection do not satisfy the minimum WSDOT volume threshold for providing a left turn lane; however, the weekday PM peak hour volumes satisfy the minimum threshold for providing a right-turn storage lane or taper with and without the proposed SMO. *Appendix "G" contains the turn lane warrant worksheets.* [Kittelson & Associates Chelatchie Bluff Mineral Lands Project, page 20].

Intersection Sight Distance

The applicant's analysis recommends that future site development applications, if and when submitted, include plans to locate and maintain all future landscaping, above-ground utilities, and site signage to provide adequate sight distance at the site driveway(s) in accordance with Clark County Code. [Kittelson & Associates Chelatchie Bluff Mineral Lands Project, page 20].

Traffic Safety

The reported crash history of the SR 503 / NE Healy Road intersection was reviewed in an effort to identify potential safety issues. WSDOT provided crash data for the intersection for the period from January 1, 2015, through December 31, 2019. Table 7 summarizes the crash data over the five-year period. Clark County generally considers a crash rate greater than 1.00 crashes/million entering vehicles (MEV) to be an indicator that a potential geometric or operational issue may exist and that further evaluations should be considered. As shown in Table 7, one reported crash was identified at the SR 503/NE Healy Road intersection over the five-year period. In December 2017, a truck was reported to have struck an earth bank or ledge while traveling north at the SR 503/NE Healy Road intersection. No injuries were reported. *Appendix "C" contains the crash data provide by WSDOT.*



Table 7. Five Year Crash Data

Intersection	Crash Type					Crash Severity			Total Crashes	Crash Rate (Crashes/MEV)
	Angle	Turn	Rear-End	Fixed Object	Head-on	PDO ¹	Injury	Fatal		
SR 503/NE Healy Road	-	-	-	1	-	1	-	-	1	0.25

¹ Property Damage Only

[Kittelson & Associates Chelatchie Bluff Mineral Lands Project, page 9].

The *Highway Safety Manual, 1st Edition* (HSM, Reference 3) provides predictive methods for rural, two lane two-way roadways and intersections similar to the SR 503/NE Healy Road intersection. Based on the current physical and operational characteristics of SR 503 and NE Healy Road, the HSM predictive method suggests the potential for 0.8 total crashes per year at the intersection, including 0.3 fatal or injury crashes and 0.5 property damage only crashes. The single reported crash is less than the four crashes that HSM suggests could be anticipated at the SR 503/NE Healy Road intersection over a five-year analysis period based on other similar intersection experience. *Appendix "C" contains the HSM predictive method worksheet.* [Kittelson & Associates Chelatchie Bluff Mineral Lands Project, page 9].

Findings: The proposed plan SMO amendment will generate an increase in potential trips over those expected from the property's current plan designation and zoning. The road segment in the study area road segments is projected to operate at acceptable roadway capacity levels of service in the 2021 base year and 2041 future year. Under the existing and proposed zoning, the intersection functions within the standards discussed below.

- The SR 503 / NE Healy Road intersection currently satisfies Clark County and WSDOT performance standards during the weekday AM and PM peak hours and is projected to continue to do so in the future with assumed site development both without and with the proposed surface mining overlay.
- The segment of NE Healy Road between SR 503 and NE 424th Street satisfies Clark County Code volume-to-capacity ratio standards during the weekday AM and PM peak hours today and in the future with assumed site development both without and with the proposed surface mining overlay.
- No capacity-based mitigation needs were identified at the SR 503 / NE Healy Road intersection to support the proposed surface mining overlay.

The proposed Comprehensive Plan amendment will have no significant impact on the operation of area streets and intersections since it does not result in a large increase in the peak hour that exceeds the adopted level of service standards.

Compliance with Clark County Transportation Policy

The following Framework Plan transportation policy (from the 20-Year Comprehensive Growth Management Plan 2015-2035) is relevant to this application.

Community Framework Plan

The Community Framework Plan provides guidance to local jurisdictions on regional land use and service issues. The Framework Plan encourages growth in centers, urban and rural, with each center separate and distinct from the others. The centers are oriented and developed around neighborhoods to allow residents to easily move through and to feel comfortable within areas that create a distinct sense of place and community. The Community Framework Plan policy applicable to this proposal includes the following:

Goal 5.0 Transportation states that "the Transportation Element is to implement and be consistent with the Land Use Element. The *Community Framework Plan* envisions a shift in emphasis of transportation systems



from private vehicles to public transit (including high-capacity transit,) and non-polluting alternatives such as walking and bicycling. The following policies are to coordinate the land use planning, transportation system design and funding to achieve this vision.” [Framework Plan, page 17]. The following transportation policy applies to the proposed action:

“5.1.6 Establish connections between Urban and Rural Centers through a variety of transportation options.” [Framework Plan, page 17].

“5.1.7 Establish regional level-of-service (LOS) standards for arterials and public transportation that ensure preservation of the region’s (rural and urban) mobility while balancing the financial, social and environmental impacts.” [Framework Plan, page 17].

“5.1.8 Encourage a balanced transportation system and can be maintained at acceptable level-of-service.” [Framework Plan, page 18].

Findings: Given the rural nature of the surrounding site vicinity, a connection to Urban Centers through the road network and railroad provide a variety of options to supply aggregate to Clark County. This amendment request is supported by the railroad operator, Portland Vancouver Junction Railroad, see Exhibit 3. The applicant’s traffic study demonstrates that the proposed plan amendment will minimally increase trips and therefore the surrounding transportation system will operate within the adopted level-of-service standards for urban street segments and intersection operations. The proposed Comprehensive Plan map amendment maintains a balanced transportation system at acceptable level-of-service consistent with the Community Framework Plan Goals and Policies.

Countywide Planning Policies (CWPP)

One of the CWPP’s purpose is to facilitate the transformation of local governance in the urban growth areas, typically through annexation to or incorporation of a city, so that urban governmental services are primarily provided by cities and rural and regional services are provided by counties.” [CWPP, page 6]

5.0 Countywide Planning Policies

“5.0.9 The state, county, MPO/RTPO and local municipalities shall work together to establish a regional transportation system which is planned, balanced and compatible with planned land use densities; these agencies and local municipalities will work together to ensure coordinated transportation and land use planning to achieve adequate mobility of goods and people.” [2016 Plan, page 151]

Findings: The county has established level-of-services standards that are consistent with the Regional Transportation Council travel demand model. These level-of-service standards ensure that the transportation facilities can accommodate the demand from the requested plan amendment to achieve continued mobility of goods and people in the future. The applicant’s traffic analysis has indicated that the proposed Surface Mining Overlay can accommodate additional worst-case scenario trips under the existing FR-80 zoning. Any development of the subject site will be required to receive all applicable permits prior to any change of use. Current road configurations can accommodate 2041 anticipated traffic on this site.

Comprehensive Growth Management Plan 2015-2035 (2016 Plan)

The 20-year Comprehensive Growth Management Plan contains policies within the land use and transportation elements. The County has adopted transportation goals policies specific to areas within County jurisdiction.

“Goal: Optimize and preserve the investment in the transportation system.” [2016 Plan page 153].



5.3 System Preservation Policies

- “5.3.1 Development projects shall adhere to minimum driveway access spacing standards along arterial and collector streets to preserve the capacity of the transportation system. The county shall work with Washington State Department of Transportation to ensure that minimum access spacing standards for state highways are maintained [2016 Plan, page 153].
- 5.3.5 The local street system shall be interconnected to eliminate the need to use collector or arterial street for internal local traffic.” [2016 Plan, page 154].

Findings: The applicant’s traffic analysis indicates that there is adequate capacity at the SR 503 / NE Healy Road intersection to support future land development with the proposed SMO in place. No capacity-based transportation mitigation needs were identified to support the proposed SMO change. The applicant’s analysis also indicates that Granite’s preferred scenario is to move 1 million tons of material by rail and the remaining 300,000 tons of material by truck.

WSDOT has reviewed and evaluated Kittelson & Associates transportation analysis prepared for Granite Construction Company. On November 8, 2021, WSDOT has indicated that the trip generation, distribution, growth rate and COVID correction factor assumptions appear reasonable.

The applicant’s transportation analysis demonstrates that the proposed amendment meets the adopted level-of-service standards. The future development of the site will need to comply with applicable county development regulations, including transportation system concurrency for any future development of the subject site. The proposed plan designation and zoning amendment are consistent with the applicable Comprehensive Plan Goals and Policies.

RECOMMENDATION AND CONCLUSIONS

This analysis and recommendation does not evaluate the merits of the land use designation or zoning application with all of the applicable policies in the comprehensive plan and Clark County Code 40.560. However, the transportation analysis and recommendation evaluate the proposal for compliance with the Transportation Element’s Goals and Policies. Therefore, the following conclusion is not based upon an analysis of compliance with all Clark County applicable policies and criteria. The proposed Comprehensive Plan and zoning amendment application CPZ2021-00006 is consistent with all applicable Clark County transportation policies, including those set forth in the Community Framework Plan, Countywide Planning Policies, and Comprehensive Growth Management Plan. Staff finds that the proposed comprehensive plan amendment and rezone of the subject parcel **has demonstrated compliance** with the Clark County Transportation Policy.

