



Cochise County

Development Services
Planning Division

Public Programs...Personal Service
www.cochise.az.gov

APPLICATION FOR A SPECIAL USE

Applicant's Name: Willcox OC, LLC

Name of All Property Owner(s): Kim A. Bennett

Applicant Mailing Address:

2525 E. Arizona Biltmore Circle, Suite A-212 Phoenix, AZ 85016

Street # Town State Zip code

Subject Property Address (if different than mailing address):

9910 North Fort Grant Rd Wilcox, AZ 85643

Street # Town State Zip code

Email Address: hannah@witheymorris.com

Phone Number: 602-230-0600

Tax Parcel Number: 201-17-002E

Current Zoning Designation: RU-4

Comprehensive Plan Land Use Category/Growth Area: Category D - Rural

Comprehensive Plan Land Use Designation: Rural

Area Plan Designation (if applicable): _____

Size of Property (in acreage or square feet): +/- 318

How many acres will be cleared and developed? TBD

Describe your relationship to this application. (Select one)

I am the property owner

I am an authorized agent for the property owner

Bisbee Office

1415 Melody Lane, Building F
Bisbee, Arizona 85603
520-432-9300
520-432-9278 fax
planningandzoning@cochise.az.gov

If the applicant is not the property owner, please attach a notarized letter of authorization to this application.

The Purpose of a Special Use

Special Uses include uses or activities with a greater potential for impacts on neighboring properties than the permitted uses in a Zoning District. Examples of Special Uses are manufacturing, RV Parks, guest ranches, hospitals and schools. These more intense uses must be carefully reviewed to decide if they could make good neighbors to the existing uses. For this reason, a Special Use Permit requires a public hearing and approval by the Planning and Zoning Commission before it is allowed.

What is the Process?

1. Pre-application meeting with County planning staff.
2. Citizen Review Process – the applicant must send notice to all property owners within a radius of no less than 300 feet of the subject parcel(s), as shown on the most recent available records of the last property tax assessment. The County Zoning Inspector may expand the mailed notification area to greater than a 300-foot radius at time of application acceptance if there are compatibility concerns associated with the request.
3. Application Submittal
4. Technical review by relevant internal staff and external agencies
5. Public Hearing – Planning and Zoning Commission (Approval/Denial)

Appeals

The Commission action can be appealed to the Board of Supervisors by anyone who disagrees with the outcome. Appeals must be filed within fifteen (15) calendar days of the Commission action. The applications are available online “Appeal: Board of Supervisors.”

Required Submittals

1. This application
2. Citizen Review Report
3. Site plan -drawn to scale showing the existing and proposed District boundaries and an accurate legal description of the area being petitioned for amendment. See “concept plan instructions for special uses” (included in this application). Please see our website for an example plan: <https://www.cochise.az.gov/development-services/special-uses>
4. Letter of Authorization (for authorized agents, if applicable)
5. Hazardous or polluting materials attachment (only if hazardous materials are proposed, if applicable)
6. Deed restrictions (if applicable)
7. Outdoor lighting, manufacturers specifications (if applicable)
8. Processing Fee

Concept Plan Instructions for Special Uses

Sometimes, an applicant will seek approval for a particular special use or uses on a piece of property well ahead of actual construction or operation of that use. Often the exact dimensions of structures or configuration of uses on the property are not known yet until the uses have been approved and the applicant has invested resources into site planning. The Zoning Regulations allow for the submittal of a "Concept Plan" in lieu of a site plan in the case of phased special uses on one property or a special use where construction is not anticipated within one year. However, if the use(s) are approved by the Planning and Zoning Commission, then a detailed site plan meeting the requirements of the Zoning Regulations will be required for each use or phase and shall be in substantial conformance with the approved special use. If the site plan is not within substantial conformance with the approved use and concept plan, then the special use will need to be reviewed, in a public hearing, by the Commission once again to modify the original proposal. **Note: any**

anticipated waivers of site development standards such as setbacks, screening, landscaping or parking spaces must be requested, justified, and approved by the Commission prior to the issuance of a building permit.

In order to adequately review the proposed special use(s) on a piece of property, a Concept Plan must include at a minimum the following information:

- Parcel boundaries and adjacent roads;
- The general location, size and height of all structures and uses (existing and proposed), including minimum setbacks from parcel boundaries, washes and roads;
- The general location and minimum number of parking spaces to be provided, including proposed surface and width of driveways;
- Proposed screening and landscaping;
- Any significant topographical features (washes, hills, rock outcroppings, wetlands) and cultural features of the property and adjacent parcels;
- If applicable, project phasing (approximate schedule of uses and construction) and any other information deemed necessary to effectively review the Special Use.

Please state the reason for this request and why it should be supported.

The proposed use of a marijuana cultivation and infusion facility would occur on land that has historically been used for agricultural purposes and located in a rural area.

The proposed use would continue the history of agriculture on the property.

In addition the use will meet all standards listed in Section 1825 of the Cochise County Zoning Regulations. There will be no sale or exchange of medication.

Identify the utility company/service provider for each of the following services and state if additional provisions or future connections are required in the space below.

Service Provider	Service Provider	Additional Provisions Required
Water/Well	Private Well	
Sewer/Septic	Septic	
Electricity	Sulphur Springs Valley Electric Cooperative	
Natural Gas	Southwest Gas	
Telephone	Valley Telecom	
Fire Protection	Willcox Rural	
Waste Disposal	Private	

Is this request consistent with all deed restrictions or private covenants in effect for this property? If applicable, please include a copy of these restrictions/covenants with this application.

Yes

No

Not applicable (no deed restrictions or covenants)

Describe all **existing** structures/uses present on the subject parcel. Note: the size and location of existing structures must be shown on the accompanying site plan.

See site plan.

Describe all **proposed** structures/uses on the parcel that to be placed on the parcel. Note: the size and location of proposed structures must be shown on the accompanying site plan.

See site plan.

Is the proposed special use consistent with stated purpose of the current zoning district? Explain.

Yes, site is still being used for agricultural uses consistent with the R-4 zoning districts.

Describe all intermediate and final products/services that will be produced/offered/sold, if applicable.

The cultivation and infusion facility will produce cannabis to be delivered to an

off-site dispensary. No products will be sold at this location and the cannabis will be

transported off-site to it associated dispensary.

What materials will be used to construct the new building(s)? (Note, for an existing building(s), please also list the construction type(s), i.e., factory-built building, wood, block, metal).

Processing buildings will be metal sided structures.

Future greenhouse buildings will be made of steel and polycarbonate material.

Will the project be constructed/completed within one year or phased?

One year

Phased

If this is a phased project, describe the phases here and physically depict them on the site plan.

See site plan.

What are the days and hours of operation (if applicable)?

Days of the week: 7 days a week; 24 hours

 AM to PM

Number of employees (if applicable):

Initially 20 Future: 200

Total average daily traffic generated (non-residential uses):

How many vehicles will be entering and leaving the site (per day)? 20

Total trucks (e.g., by type, number of wheels, or weight)? One 18 wheel truck

Estimate which direction(s) and on which road(s) the traffic will travel from the site.

Both from north and south on Fort Grant Road

If more than one direction, estimate the percentage that travel in each direction.

80% to the north on Fort Grant Road and 20% to the south on Fort Grant Road

At what time of day, day of week and season (if applicable) is traffic the heaviest?

Traffic will likely be heaviest in October/November

Will your property be served by a private well? If private well, show the location on the site plan. Also, please answer the following:

Estimated total gallons of water used: per day 100,000 per year _____

Will your property be served by a septic system? Yes No

If yes, show the septic tank, leach field and 100% expansion area on the site plan, and indicate whether the system is existing or proposed.

Does your parcel have permanent legal access*? If no, what steps are you taking to obtain such access? (*Our Zoning Regulations state that no building permit for a nonresidential use shall be issued unless a site has permanent and direct access to a publicly maintained street or street where a private maintenance agreement is in place. Said access shall be not less than twenty (20) feet wide throughout its entire length and shall adjoin the site for a minimum distance of twenty (20) feet. If access is from a private road or easement provide documentation of your right to use this road or easement and a private maintenance agreement.)

Yes

Which streets or easements will be used for traffic entering or exiting the property? (Please label on the accompanying plan)

Fort Grant Road will be the key access point to the Property.

What impact will this have on the traffic volume of roads serving this subject property?

This road will be improved for the proposed use and will not have a significant impact on traffic.

How many driveway cuts are proposed along streets or easements to allow site access? State whether this is an increase/decrease and whether any existing cuts will need relocation.

See site plan.

Does the subject parcel have site access onto a major road?

Yes

No

Are you requesting any modifications or waivers from site development standards? Please explain.

No site development standard modifications are requested with this development.

Is the subject property within Sierra Vista Sub-Watershed Overlay Zone? If so, please indicate this, and that you understand that it will be subject to additional plan reviews and inspections whenever a building permit is required.

Yes, and I understand the permitting requirements

No, it's outside the boundaries

Please describe your citizen review process (if applicable). Specifically, state whether you received any responses to your mailed notice or public meeting. Explain how your special use application has incorporated the feedback you received.

We mailed the initial letters for this SUP submittal to the Property owners

within 1,000 ft and will be available to answer any of their questions and discuss any

concerns that may arise. The mailing list and details are included in the SUP submittal.

Identify the utility company/service provider for each of the following services and state if additional provisions or future connections are required in the space below.

Service Provider	Service Provider	Additional Provisions Required
Water/Well	Private Well	
Sewer/Septic	Septic	
Electricity	Sulphur Springs Valley Electric Cooperative	
Natural Gas	Southwest Gas	
Telephone	Valley Telecom	
Fire Protection	Willcox Rural	
Waste Disposal	Private	

Describe any outdoor activity associated with your special use proposal.

There will be outdoor grow areas for the use that will be secured and screened from adjacent properties.

Will outdoor storage of equipment, materials or products be needed? If yes, show the location on the site plan. Describe any measures to be taken to screen this storage from neighboring properties.

No.

Will any noise or vibrations be produced that can be heard or felt on neighboring properties on a regular basis? if yes; describe the level and duration of this noise. What measures are you proposing to prevent this noise from being heard on neighboring properties?

No noise or vibrations will be produced.

Will odors be created? If yes, what measures will be taken to prevent these odors from escaping onto neighboring properties?

Odors will be created and best efforts measures will be taken in order to prevent odors from escaping to other properties. In addition, an odor mitigation plan will be put into place so best efforts will be practiced to de minimize escaping odors.

Will any on-site activities attract pests, such as flies or mice? If yes, what measures will be taken to prevent a nuisance on neighboring properties?

Consistent with Traditional Agriculture, we will be utilizing approved integrated pest management to mitigate any additional pest pressure that could potentially impact the area.

Will additional dust be created on a regular basis? If yes, what measures will be taken to prevent this dust from escaping onto neighboring properties or roadways?

Dust suppression water systems will be placed around the site to reduce any
dust created.

Is outdoor lighting proposed? If yes, show the location(s) on the site plan. Indicate how neighboring properties and roadways will be shielded from light spillover. Please submit manufacturer's specifications for all light fixtures.

Yes No Security lighting only , full shielded, that is motion sensed,

Will you be performing any off-site construction (e.g., access aprons, driveways, and culverts)? If yes, show details on the site plan. Note: The County may require off-site improvements reasonably related to the impacts of the use such as road or drainage improvements.

Yes No

Show on-site drainage flow on the site plan. Will drainage patterns on site be changed? If so, please indicate on the site plan and describe below.

See site plan.

If more than one acre is to be cleared, describe the proposed dust and erosion control measures to be used and show on site plan, if appropriate.

Dust suppression watering systems will be placed around the property in order to control
any dust that is created.

If the developed portion of the site is one acre or larger, specific measures to conserve water on-site must be provided. Specifically, design features that will be incorporated into the development to reduce water use, provide for detention and conserve and enhance natural recharge areas must be described. What specific water conservation measures are proposed (for applicable site 1+ acres)? Describe here and/or show on the site plan submitted with this application.

Future instillation of above ground water retention will be installed on the site.

In addition, special drip irrigation will be installed to reduce water waste on the site.

Do you anticipate the use of any hazardous or dangerous materials? If yes, please complete a "Hazardous or Polluting Materials Attachment" and attach it to this application.

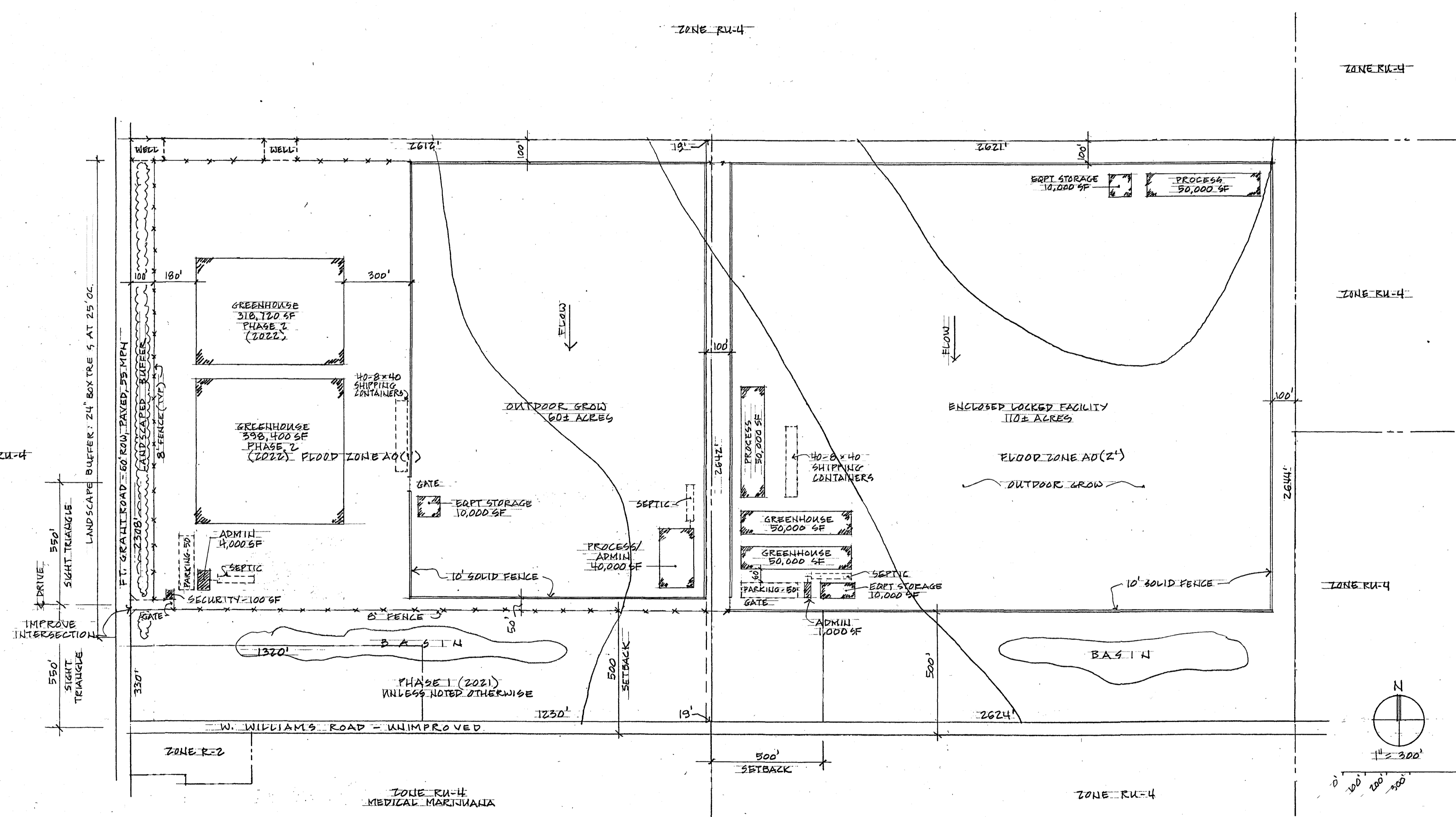
Yes No

I hereby certify that I am the owner or duly authorized owner's agent and all information in this questionnaire, in the Joint Permit Application and on the site plan is accurate. I understand that if any information is false, it may be grounds for revocation of the Commercial Use/ Building/ Special Use Permit. In addition, I hereby request all inspections necessary to process this application, and if the permit is issued, I request all inspections necessary to monitor progress, and document completion, at all stages of the work related to this permit. Failure to obtain permits may result in fines or other penalties.

Hannah Blead Withey Morris, PLC 1/29/21

Applicant Signature

Date



SITE DEVELOPMENT ANALYSIS		
ITEM	PERMITTED/REQUIRED	PROPOSED
ASSESSOR	201-17-002E	
PARCEL NUMBERS/ZONE	RU-4	
ZONE	CATEGORY D (RURAL)	
GROWTH AREA	X, AO (1), AO (2)	
FLOOD ZONE	RU-4: RURAL RESIDENTIAL AGRICULTURAL	
USE	MEDICAL MARIJUANA CULTIVATION FACILITY (SPECIAL USE)	
SITE AREA	4.0 ACRES MINIMUM	318± ACRES
BUILDING AREA	N/A	ULTIMATE: 991,220 SF
MAXIMUM HEIGHT PRINCIPAL STRUCTURE	RU-4: 30'	±30'
MAXIMUM HEIGHT ACCESSORY STRUCTURE	30'	±30'
MAXIMUM HEIGHT WALL OR FENCE	RU-4: 8'	10' SOLID FENCE AT OUTDOOR CULTIVATION AREA AS MANDATED BY AZ DHS
MINIMUM SETBACKS	MEDICAL MARIJUANA CULTIVATION FACILITIES: 500' RU-4: 80' ROADWAYS, OTHER BOUNDARIES: 20'	WILL COMPLY
MAXIMUM SITE COVERAGE (BUILDINGS AND IMPERVIOUS SURFACES)	25%	7.2%
DISTANCE BETWEEN STRUCTURES	15'	±15'
SCREENING	NO REQUIREMENT	
OFF-STREET PARKING	1 SPACE PER 3 EMPLOYEES ON LARGEST SHIFT	100 SPACES PROVIDED
OFF-STREET LOADING	±50,000 SF 4 SPACES	4 SPACES
LANDSCAPING	NO REQUIREMENT CATEGORY D GROWTH AREA	LANDSCAPED BUFFER AT FORT GRANT ROAD FRONTAGE SIGHT TRIANGLE DISTANCE AT FT GRANT ROAD: 550' MINIMUM UPGRADE INTERSECTION OF ACCESS DRIVE AND FT GRANT ROAD
SITE ACCESS STANDARDS	TBD	
OUTDOOR STORAGE	NO RESTRICTION IN CATEGORY D GROWTH AREA	N/A
LIGHT POLLUTION	WILL COMPLY SECURITY LIGHTING ONLY	
SIGNS	FT GRANT ROAD AS ARTERIAL 32 SF MAXIMUM 6' HIGH MAXIMUM	WILL COMPLY

RAYMOND KLUMB ARCHITECT
 ARCHITECTURE INTERIOR DESIGN SPACE PLANNING
 571 North Frontage Road - Peoria, AZ 85625
 Phone: (520) 866-5322
 AZ 39108 IN A-12328 PA 3000420
 OH 1717076 TX 24401



MEDICAL MARIJUANA CULTIVATION AND PROCESSING
 9910 FORT GRANT ROAD
 APN: 201-17-002E
 WILLCOX, COCHISE COUNTY, ARIZONA

REVISIONS		

SCALE: 1" = 300'
 DATE: 2/18/2021
 DWG. TITLE: SITE PLAN
 SHEET OF: SP-1
 PROJECT: OASIS OF ARIZONA - FT GRANT RD.

Odor Mitigation Plan Fort Grant Road SUP

The following measures will be taken to mitigate and eliminate odor from the facilities during operations. Multiple layers of odor control will be installed, including: redundant carbon filtration, negative air pressure, odor ionization technology, and employee standard operating procedures.

I. Procedures

These Procedures will be applied to the following odor-emitting areas of activity:

- Indoor Mother/Clone Rooms
 - Indoor Vegetative Rooms
 - Indoor Drying Rooms
 - Indoor Trimming Rooms
 - Indoor Packaging Rooms
- a. Staff Training Procedures – Staff training sessions will be conducted at our facility on a regular basis through training programs where odor mitigation will be taught. During training sessions, interactive, on site education will take place, where employees will be trained on essential protocols, including, but not limited to: procedures for checking expiration of carbon filters, changing filters, and detection of air seals at the facility. These training sessions are continuous in nature and content reviews will occur to ensure that educational material is reviewed by existing employees and provided to new employees.
- b. Record Keeping – Carbon filter report cards will be maintained and filled out after every change by our manager on duty. We will inventory a supply of filters on site that will be re-ordered, in line with our facility maintenance program. In the event that a filter needs to be changed early, additional filters will be on premises.
- c. Monitoring and Inspection – Every odor emitting area will be continuously monitored with daily inspections. If an odor is detected to be leaving the indoor facilities by any employee, protocols will direct said employee to report the odor issue to management. Furthermore, doors and seals to the exterior of the facility shall be monitored on a daily basis to ensure an air-tight seal.

II. Technical System Design and Equipment Installation: The following systems are intended to be utilized:

- a. Bi-Polar Ionization Control: Plasma air system odor control: The ions produced by Plasma Air units, breaks down gases with electron-volt potential numbers below 12 to harmless compounds prevalent in the atmosphere such as oxygen, nitrogen, water vapor and carbon dioxide. The resultant compounds are a function of the entering contaminants into the plasma field. In this case the VOC's or terpene odors generated by cannabis break down to carbon dioxide and nitrogen, and water vapor thus eliminating the odor.

Positive and negative ions are drawn to airborne particles by their electrical charge. Once the ions attach to the particle, the particle grows larger by attracting nearby particles of the opposite polarity, thereby increasing the filtration effectiveness. This process kills Virus, Bacteria, & Mold, similar to how positive and negative ions surround particles, as they are also attracted to pathogens.

- b. Odor Control – Active carbon filters absorb molecular weight of contaminants that it comes in contact with. Adsorption is a distinct process where organic compounds in the air react chemically with the activated carbon, which causes them to stick to the filter. The more porous the activated carbon is, the more contaminants it will capture. The filters intended to be utilized are most notably used to remove terpene compounds in Cannabis cultivation facilities. When applied correctly, efficiency of 99.9%, stated by several vendors can be achieved.

III. Odor Mitigation System Design

- a. Cultivation Rooms – The intended design will call for each interior cultivation or vegetative room to have high efficiency carbon filtration.
- b. Drying Rooms – The intended design will call for each drying room to have carbon filtration systems in addition to cooling, heating, and dehumidification.
- c. Trimming Rooms – The intended design will call for each trimming room to have carbon filtration systems in addition to cooling, heating, and dehumidification.
- d. Packaging Rooms – The intended design will call for each packaging room to have carbon filtration systems in addition to cooling, heating and dehumidification.

IV. Maintenance Plan

- a. Plasma Bi-Polar Ionization Units – Manufacturer recommended service requirements for cleaning electrodes every two years in order to maintain effectiveness will occur.
- b. Active Carbon – Active carbon filters absorb molecular weight of contaminants it comes in contact with. Adsorption is a distinct process where organic compounds in the air react chemically with the activated carbon, which causes them to stick to the filter. The more porous the activated carbon is, the more contaminants it will capture. These filters are most notably used to remove terpene compounds in air purification systems customarily installed in cannabis facilities. Active carbon filters will be changed on a regular basis and additional replacement filters will be on site.
- c. Maintenance and staff will conduct regular inspections of the buildings, including all ingress and egress areas and seals to ensure buildings remain air tight.

V. Outdoor Odor Mitigation

We have done extensive research on the best system to mitigate outdoor odors with marijuana grow facilities and have found a state of the art odor mitigation system from FogCo. This system is installed around the perimeter of the outdoor cultivation areas and utilizes misters in order to capture any potential odor coming from the property. In addition, the mister system works as a dust-proofing system and therefore provides two benefits with one system.



PHONE: 602-230-0600

FAX: 602-212-1787

2525 E. Arizona Biltmore Circle, Suite A-212, Phoenix, AZ 85016

January 29, 2021

Robert Kirschmann, Planner II
Cochise County Community Development
1415 Melody Lane, Building E
Bisbee, Arizona 85603

Re: 9910 North Fort Grant Rd/ SUP for a Marijuana Cultivation and
Infusion Facility

Dear Mr. Kirschmann,

This firm represents Willcox OC, LLC, the applicant for a Special Use Permit for a Marijuana Cultivation and Infusion Facility proposed at 9910 North Fort Grant Rd, near Wilcox in Cochise County, Arizona (the "Property"). Attached for submittal are the following: site plan and the application form. The fee will be paid online upon submittal of the application.

The purpose of this letter is to provide the appropriate context for the Property and this application. The Property is made up of a parcel zoned RU-4. Per the Cochise County Zoning Code, a marijuana cultivation and infusion facility is permitted in the RU-4 zoning districts, subject to obtaining a Special Use Permit. The applicant proposes to operate a marijuana cultivation and infusion facility at this location.

The proposal will be a phased project, where grow fields will occur in the first phase and greenhouse buildings will be introduced in the second phase. The location of the property is among agriculture uses/fields and is located in a rural area and adjacent to a similar use. This location makes it ideal for this use, and is spaced appropriately from residential uses. Pursuant to State law and County ordinance requirements, the applicant proposes to use the property for cultivation and infusion of marijuana.

The proposed use will have no impact on the surrounding and adjacent properties. The site will be secure and screened from adjacent properties and the facility will comply with state requirements regarding video surveillance and County ordinance requirements. In its simplest form, the grower has decided to merely grow a plant as any other agricultural use is allowed in the area. In addition, no sales will occur on this Property. Further information regarding the facility and its operations are outlined in the attached application. It is anticipated that this application will be heard by the Planning Commission in March 2021.

Thank you for your attention to this matter and, as always, I appreciate your assistance. Please do not hesitate to contact me at 602-230-0600 or at adam@witheymorris.com if you have any questions or you need additional information.

Very truly yours,

WITHEY MORRIS P.L.C.

Hannah Blead on behalf of Adam Baugh

By

Adam Baugh

February 23, 2021

Christine McLachlan, AICP, Planner II
Cochise County Community Development
1415 Melody Lane, Building E
Bisbee, Arizona 85603

Re: Supplemental Information for 9910 North Fort Grant Rd/ SUP for a
Marijuana Cultivation and Infusion Facility

This firm represents Willcox OC, LLC, the applicant for a Special Use Permit for a Marijuana Cultivation and Infusion Facility proposed at 9910 North Fort Grant Rd, near Wilcox in Cochise County, Arizona (the "Property"). We submitted an initial SUP application on January 29, 2021.

Since the time of the submittal, we have reviewed recently approved Special Use Permit cases and received input from County staff regarding recommendations to mitigate potential concerns from our proposal. Some of feedback include adding perimeter landscaping, addressing odor concerns, lighting and security options, and adding perimeter buffers. We appreciate the feedback and have revised our application to reflect these new improvements and have modified our application.

Perimeter Landscaping & Buffer

Per state law, a 10-foot-tall wall is required around the Property. We have agreed to improve wall aesthetics, particularly from Fort Grant Road. We propose the following:

- Add landscaping that will be planted with mature drought tolerant vegetation,
- Plant a minimum 24" box shade trees installed 40-feet on center, or in equivalent spacing along Fort Grant Road.
- Proposed fencing and wall shall not diminish the visual quality of the premises or surrounding area. Razor wire or similar material is not permitted.
- Provide a 100-foot buffer around the property to set back the wall from any roads/adjacent properties.
- Preserve any desert vegetation that is existing in that buffer. This will create an area with landscaping/open space to enhance the rural nature of the operation.

Odor Mitigation Plan

An odor mitigation plan was submitted with the initial Special Use Permit submittal that mainly addressed indoor grow facilities. Additionally, we are proposing new mitigation measures for the exterior as well. We have done extensive research on the best system to mitigate outdoor odors with marijuana grow facilities and have found a state-of-the-art odor mitigation system from FogCo. This system is installed around the perimeter of the outdoor cultivation areas and utilizes misters in order to capture any potential odor coming from the property. In addition, the mister system works as a dust-proofing system and therefore provides two benefits with one system. We looked into the vapor system but found that, while they claim to be “water-less”, they do in fact use water in their system, and do not provide the added benefit of dustproofing, which is critical in this agricultural area.

We are proposing to install this system on the perimeter of the entire outdoor cultivation areas and have updated the odor mitigation plan with these changes, found at **Tab 1**.

Lighting & Security

With our initial proposal we were including lighting at some points on the perimeter wall; however, after recommendations from County staff we are proposing a drone security system (or similar) to reduce the required lighting around the perimeter of the property. This system uses infrared and therefore works best without additional lighting. The only lighting that is provided will be automatic security lighting at any door locations that will be facing toward the door and will fully comply with the Cochise County Outdoor Lighting Regulations.

Proposed Recommendations

In summary, below is a list of recommended stipulations that we propose for our Special Use Permit application in order to address staff’s feedback:

- The 10-foot wall along Fort Grant Road shall be screened with mature drought tolerant vegetation, including minimum 24” box shade trees planted 40-feet on center, or in equivalent spacing. This vegetation shall be irrigated. Prior to the issuance of a building permit the applicant shall provide a landscape maintenance and irrigation plan, including fertilization schedule and guarantee of all plant material for no less than three years from date of final inspection.
- A minimum 100-foot buffer area shall be maintained around the property on all sides.
- The applicant shall utilize a drone security system (or similar) to reduce the required lighting around the perimeter of the property. Any lighting shall fully comply with the Outdoor Lighting Regulations.
- Greenhouses shall utilize “blackout panels” or similar product to reduce the lighting impacts from grow lights.
- All indoor grow facilities shall be equipped with odor control filtration and ventilation system(s) based on current industry-specific best control technologies and best management practices. No operable windows or exhaust vents shall be

located on any building façade that abuts a residential use or zone. Exhaust vents on rooftops shall direct exhaust away from residential uses and Ft Grant Road.

- All outdoor cultivation areas shall be equipped with odor control based on current industry-specific best control technologies, such as FogCo misting system, and best management practices that result in neutralization of the odor from the cannabis to a level that cannot be detected by a person with a normal sense of smell on an adjoining property.
- The applicant submit a hazardous materials questionnaire in conjunction with permitting. All chemicals, fertilizers, or any hazardous product associated with the cultivation of marijuana shall be used, stored and disposed of in a manner consistent with the manufacturer's instructions and/or any law that governs same. Cannabis remnants, infused products, bi-products, and other waste material shall be rendered unusable and disposed of in a safe, sanitary, and secure manner.

With the addition of the recommendations above, the project will be a state-of-the-art operation that will remain compatible with the rural nature of the area and meets the intent of the zoning district.

Thank you for your attention to this matter and, as always, I appreciate your assistance. Please do not hesitate to contact me at 602-230-0600 or at adam@witheymorris.com if you have any questions or you need additional information.

Very truly yours,

WITHEY MORRIS P.L.C.

By
Adam Baugh