



## Development Services

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### MEMORANDUM

**TO:** Cochise County Planning and Zoning Commission  
**FROM:** Matthew Taylor, AICP, Planner II  
**FOR:** Christine McLachlan, AICP, Planning Division Manager  
**SUBJECT:** Docket RZ24-19 (Primrose St)  
**DATE:** November 13, 2024

### Docket RZ24-19 (Primrose St)

A request to rezone an undeveloped 15-acre parcel from R-36 (Residential District, one dwelling per 36,000 square feet) to R-9 (Residential District, one dwelling per 9,000 square feet) for a manufactured home subdivision. The property is located at the southwest corner of Primrose Street and Lincoln Avenue near Douglas.

### I. DESCRIPTION OF SUBJECT PARCEL AND SURROUNDING USES

Applicant: Bramhall Investments Inc – Trystan Trenberth  
Location: Primrose Street/Lincoln Avenue  
APN: 410-07-427B  
Parcel Size: 15 acres  
Current Zoning: R-36  
Proposed Zoning: R-9  
Growth Area: B – Community Growth Areas  
Plan Designation: Developing  
Area Plan: None  
Existing Use: Undeveloped  
Proposed Use: Manufactured Home Subdivision

### Surrounding Zoning and Land Uses:

North	MH-72	Manufactured Home Subdivision
South	R-36	Single Family Residence, Undeveloped
East	R-36	Single Family Residence, Undeveloped
West	R-36	Single Family Residence, Undeveloped

### II. PARCEL HISTORY

None.

### III. NATURE OF REQUEST

The applicant requests rezoning 15 acres from R-36 to R-9 to develop a manufactured home subdivision with 35-45 lots averaging about .22 acres (9,500 square feet).

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**Mandatory Compliance**

Section 2.63.080 of the zoning regulations requires zoning district boundaries be in accordance with comprehensive or area plan designations. In this case, the proposed rezone to R-9 is consistent with the Comprehensive Plan’s “Developing” land use designation.

**Compliance with Rezoning Criteria**

Section 2.63.080 of the zoning regulations provides fifteen (15) criteria for evaluating rezoning requests:

**1. Adequate Land Use/Concept Plan: Complies**

The applicant provided a concept plan. Future development of the site will comply with applicable standards identified in the zoning regulations including setbacks, height, lot coverage, landscaping, screening, parking and loading, vehicular access, and other county site development standards. Since the development includes individually platted lots, the project will go through the plat process outlined in Subdivision Regulations.

**2. Compliance with Applicable Site Development Standards: Complies**

The development will comply with the development standards of the base R-9 zoning district. Additional standards including lot layout, internal circulation, sidewalks, addressing, will be evaluated during the subdivision plat process.

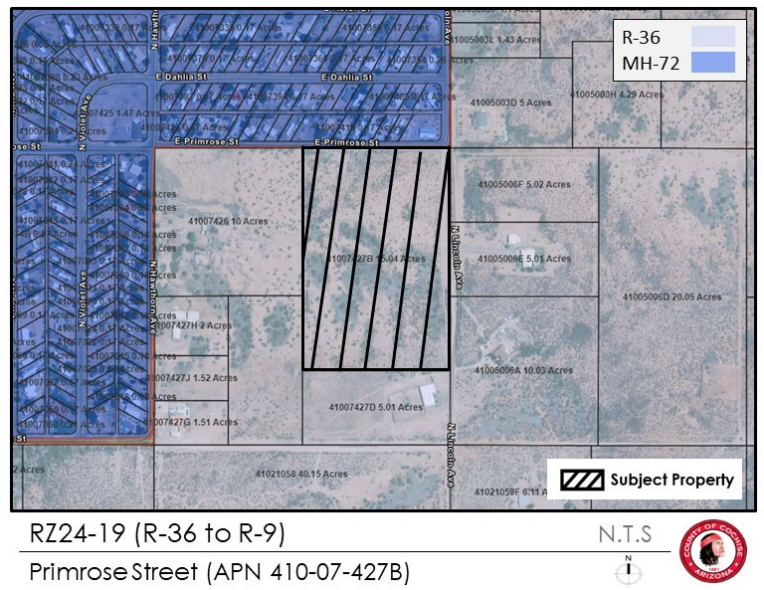
**3. Adjacent Districts Remain Capable of Development: Complies**

The requested downzone does not prevent surrounding properties from being developed in a manner consistent with their R-36 zoning classification. The proposed zoning retains its residential zoning classification and does not generate burdensome development standards or requirements on adjacent properties. The subject property abuts six parcels to the east, west, and south with R-36. Four of these parcels having existing single family residences. The property has about 660’ of frontage along Primrose Street and is located directly south of Bay Acres, a mobile/manufactured home subdivision platted in 1962. Lots within Bay Acres average about 7,500 square feet.

**4. Limiting Creation of Nonconforming Uses: Complies**

Rezoning the property to R-9 does not create any nonconforming uses since the property is undeveloped.

**5. Compatibility with Existing Development: Complies**



The applicant requests upzoning the property to R-9 to develop a manufactured home subdivision with 35-45 individual lots averaging about 9,500 square feet. This develop would be consistent with nearby Bay Acres, a mobile home subdivision with 7,500 square foot lot sizes. The property is abutted on three sides by larger lots of one or more acres that are also zoned R-36. Several of these lots have existing single family dwellings. The proposed single family use itself is compatible with surrounding development, but the increased density and dissimilar housing type could be perceived as incompatible by some nearby property owners. The property's location within Growth Area B and subdivision requirements will require perimeter enhancements (fencing, landscaping) that can offset potential visual impacts associated with higher density development.



**6. Rezoning to More Intense Districts: Not Applicable**

The proposed rezone to R-9 retains the existing residential classification and is not to a more intense business or industry zoning district.

**7. Adequate Services and Infrastructure: Complies**

The property is located within the Arizona Public Service (APS) and Sunnyside Volunteer Fire District service areas. The nearest fire station is located less than ½ mile west (3359 Washington Avenue). Connections to City of Douglas water and sewer services are proposed and assurances will be required during the subdivision plat process. The property is located at the southwest corner of Primrose Street and Lincoln Avenue with primary and secondary access locations reviewed by the county in accordance with the required right-of-way (ROW) permit.

**8. Traffic Circulation: Complies**

The property has access to two local streets. Public street access and interior circulation will be evaluated by the county during the subdivision plat process.

**9. Development Along Major Streets: Not Applicable**

This factor does not apply since the property has access to local streets and not any collector or arterial roads or major highways.

**10. Infill Compatibility: Not Applicable**

This factor applies to rezoning requests to General Business (GB), Light Industry (LI), or Heavy Industry (HI) zoning districts in areas designated by the comprehensive plan as “Enterprise” or “Enterprise Redevelopment.”

**11. Unique Topographic Features: Not Applicable**

This factor applies to rezoning requests to business or industry districts. Approximately 16,000 square feet of the parcel's northwest corner is located within Flood Zone A.

**12. Water Conservation: Complies**

County-wide water conservation requirements and applicable regulations, including county subdivision regulations, identify water conservation measures that apply to this project. The property's location within the Douglas Active Management Area will require an additional layer of review by the Arizona Department of Water Resources (ADWR). Private well or water company is not proposed given the proximity of City of Douglas water service infrastructure.

**13. Public Input: Complies**

The applicant mailed letters to surrounding property owners on August 22, 2024, without response. Staff mailed notices to nearby property owners within 500', posted the property, and published legal notice between October 23-25, 2024.

**14. Hazardous Materials: Not Applicable**

This factor does not apply to the proposed single family residential development.

**15. Planning Policies: Complies**

The property is designated "Developing" by the Comprehensive Plan. A rezone from R-36 to R-9 retains the existing residential zoning classification and is consistent with the Plan's land use designations.

**IV. SUMMARY AND CONCLUSION**

The applicant requests rezoning 15 undeveloped acres from R-36 to R-9 for a residential development specific to manufactured housing. The property abuts Bay Acres, a mobile/manufactured home subdivision with similar housing types and densities to what the applicant proposes as well as several larger parcels with single family residences. County subdivision regulations apply to the project and includes review of lot sizes and layout, internal circulation, stormwater management, access to public streets, and availability of services and infrastructure. Development of individual lots would be subject to Section 2.18 of the zoning regulations and evaluated for zoning and building compliance at permitting.

**Factors in Favor of Approval**

1. Complies with ten (10) applicable factors used to evaluate rezoning requests.

2. Existing manufactured home subdivision nearby with similar residential density.
3. Affordable housing opportunity for county residents.

**Factors Against Approval**

1. Adjacent to large residential lots with existing single family residences.
2. Opposition from nearby property owners.

**V. RECOMMENDATION**

Based on the factors in favor of approval, Staff recommends forwarding the request to rezone tax parcel 410-07-427B from R-36 (Residential District, one dwelling per 36,000 square feet) to R-9 (Residential District, one dwelling per 9,000 square feet) to the Board of Supervisors with the following condition of approval:

1. Within 24 months of the rezoning approval date, either an approved subdivision plat must be recorded or a permit for an approved manufactured home park must be issued; otherwise, the rezoning may be revoked by the Board of Supervisors.

**Sample Motion**

Madam Chair, I move to recommend approval of Docket RZ24-19 to the Board of Supervisors with staff's recommended condition, rezoning tax parcel 410-07-427B from R-36 to R-9, the factors of approval constituting the findings of fact.

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