



## 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:** SU24-21 (Hwy 82 RV Park)  
**DATE:** January 8, 2025

### Docket SU24-21 (Hwy 82 RV Park)

A Special Use Authorization request for a 60-space recreational vehicle park.

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

Applicant: Harley Martin  
Location: Southwest Corner of W. Highway 82 and N. Rascal Ranch Road  
APN: 106-12-002A  
Parcel Size: 23 acres (6 acre project area)  
Zoning: RU-4 (Rural District, one dwelling per 4 acres)  
Plan Designation: Rural  
Growth Area: D – Rural Areas  
Existing Use: Undeveloped  
Proposed Use: Recreational Vehicle Park

### Surrounding Zoning and Uses

North	RU-4	Single Family Residential
South	RU-4	State Land
East	RU-4	Single Family Residential
West	RU-4	State Land

### II. SITE HISTORY

- No active code compliance actions

### III. SPECIAL USE AUTHORIZATION REQUEST

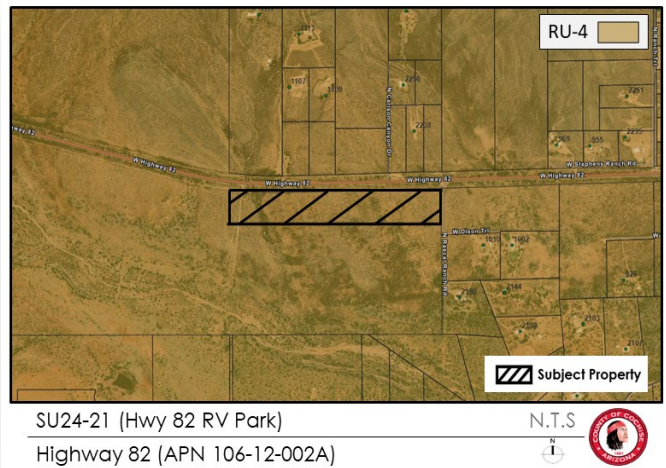
The applicant requests special use approval for a 60-space recreational vehicle park. Amenities include general store, laundry, restroom, and shower facilities, dog parks, and perimeter open space.

### IV. ANALYSIS OF IMPACTS – COMPLIANCE WITH SPECIAL USE FACTORS

Section 2.48.160 of the Zoning Regulations identifies ten (10) factors to evaluate Special Use applications. These factors determine the suitability of a special use request, whether to recommend approval, and to determine if conditions and/or modifications are needed to mitigate potentially negative impacts on surrounding properties. With the information provided, nine (9) factors apply to this special use request with eight (8) factors complying:

### 1. Compliance with Duly Adopted Plans: Complies

The subject property is designated “Rural” by the Comprehensive Plan and falls within Growth Area D (Rural Areas). The current RU-4 zoning is not changing so the zoning district remains consistent with Comprehensive Plan land use designations. Rural areas are characterized by large tracts of undeveloped lands with low density residential development at a minimum of 2 dwellings per acre. The property is about 2.5 miles west of a major commercial node, the intersection of Highways 82 and 90, and at the western edge of suburban residential development on lots ranging from ½ to four acres or larger.



### 2. Compliance with the Zoning District Purpose: Complies

Rural districts, which range in site area from 2 acres to 36 acres, allow residential and non-residential uses compatible with an area’s rural character. County zoning regulations specifically identify RV parks as an allowed use with approval of a special use authorization by the Planning and Zoning Commission. Parks must be “designed to ensure that the park fits into the rural landscape, such as clustering RV sites, maintaining perimeter open space, and enhancing existing vegetation using drought-tolerant vegetation.”

The zoning district encourages recreational services compatible with rural living and more intense non-residential uses provided they are developed with a sensitivity to the character of rural areas and natural environment and harmonious with existing development. More intense zoning districts, such as business and industry districts, are typically appropriate along major roadways. The property abuts State land to the south and west, limiting impacts to existing residences. There are twelve properties with existing single-family residences ranging between 4 and 40 acres within 1500’ to the north and to the east.

### 3. Development Along Major Streets: Complies

The intent of this factor is to consider limiting the number of access points on major thoroughfares, arterials, or collectors by using frontage roads, shared access, and no access easements. Incorporating such measures promotes fewer road cuts to avoid potentially unsafe traffic conflicts, hazardous traffic congestion, and roadway obstruction caused by traffic.

The property has direct access from State Highway 82 via an existing driveway which is under Arizona Department of Transportation (ADOT) jurisdiction (a county right-of-way permit is not required). ADOT’s Southcentral District provided the following comments relative to access and improvements:

- *Based on the development type, size and location, we are willing to waive a TIS.*
- *A newly paved driveway should be required. Their existing one (which appears to only be 20' wide) needs to be updated to support the commercial traffic (at least 30' wide with 35' radii).*
- *They would be more than welcome to construct a left turn lane, but we do not believe a turn lane would be warranted/required.*

As a conditional of approval, staff recommends the applicant provide confirmation of acquired ADOT permits or required on or off-site improvements prior to applying for development permits with the county. The application references a deceleration lane which will require ADOT approval.

#### **4. Traffic Circulation: Does Not Comply**

This Special Use Authorization factor stipulates:

1. The request is consistent with the preservation of the functions of surrounding streets as defined in the County Comprehensive Plan.
2. The request does not result in the use of any residential street for non-residential traffic.
3. Consideration of future circulation needs in the surrounding area has been considered through right-of-way dedication and off-site improvements if warranted.



The subject property fronts State Highway 82 which is under ADOT jurisdiction. It is unlikely this project would result in any significant changes to existing roadway classifications, ROW requirements, or major off-site improvements. However, the applicant proposes using Rascal Ranch Road for secondary access by emergency and service vehicles visiting the site which contradicts the purpose of this factor which prohibits the use of residential roads for non-residential traffic. Rascal Ranch is a public easement providing access to Highway 82 for eight parcels, five with existing single family residences.

#### **5. Adequate Services and Infrastructure: Complies**

The property is within Sulphur Springs Valley Electric Cooperative (SSVEC) service area. Nearest fire stations are Whetstone Fire District Station 321 (3.7 miles) and Huachuca City (7.2 miles). The park will be served by future private well and septic systems and private waste management company. An expansion or extension of existing services or infrastructure supporting project development is not necessary if the special use is approved by the Commission.

#### **6. Significant Site Development Standards: Complies**

Applicable development standards contained in Sections 2.15 (*RU Districts*) and 2.51 (*Mobile Homes, Manufactured Homes, and Recreational Vehicle Parks*) apply to this project. The applicant has only requested one waiver, increasing allowed density above what is allowed by the existing rural zoning. Comparative analysis of Sections 2.15 and 2.51 is in the table below:

<b>STANDARD</b>	<b>2.15 (RURAL DISTRICTS)</b>	<b>2.15 (RV PARKS)</b>
<b>Minimum Development Area</b>	4 acres	No minimum (23 acres proposed)
<b>Density</b>	One dwelling per 4 acres	60 RV spaces. Estimated density 2.6 spaces per acre (16,698ft <sup>2</sup> per unit) at max capacity.
<b>Perimeter Setback</b>	20'	7.5' between spaces, 10' within park boundary
<b>Maximum Building Height</b>	30' (principal and accessory buildings)	30' (principal structures) / 20' (accessory structures) / 8' fences and walls
<b>Maximum Site Coverage/Open Space</b>	25%/0%	Site coverage 55% per space and for park, 75% for recreational areas. 10% dedicated to recreational facilities.
<b>Principal Building Separation (include RVs)</b>	15'	15'
<b>Parking/Circulation</b>	1 parking space per pad	1 per RV space. Internal 24' two drives, 12' one way drives.
<b>Landscaping/Screening</b>	Category D (Rural Areas): 6' solid screen when abutting rural residential	6' solid screen (fence, wall, vegetative equivalent) along Rascal Ranch Road
<b>Street Access</b>	Access from public and/or private roads	Access to perimeter streets via designated park entrances only (primary access from Hwy 82, emergency access from Rascal Ranch Road)

**7. Public Input: Complies**

Section 2.48.160 of the Zoning Regulations states, “If public concerns have been raised, it is fair to ask if the applicant has made a reasonable effort to address these concerns through the Citizen Review Process.” The applicant sent letters to property owners within 300’, receiving opposition and leading to a significant reduction in the number of proposed spaces from 190 to 60. Common concerns are water usage, increased traffic, and noise. Staff has received written responses from property owners outside the notification area, citing a variety of concerns including water consumption, stormwater runoff, lighting, noise, and traffic.

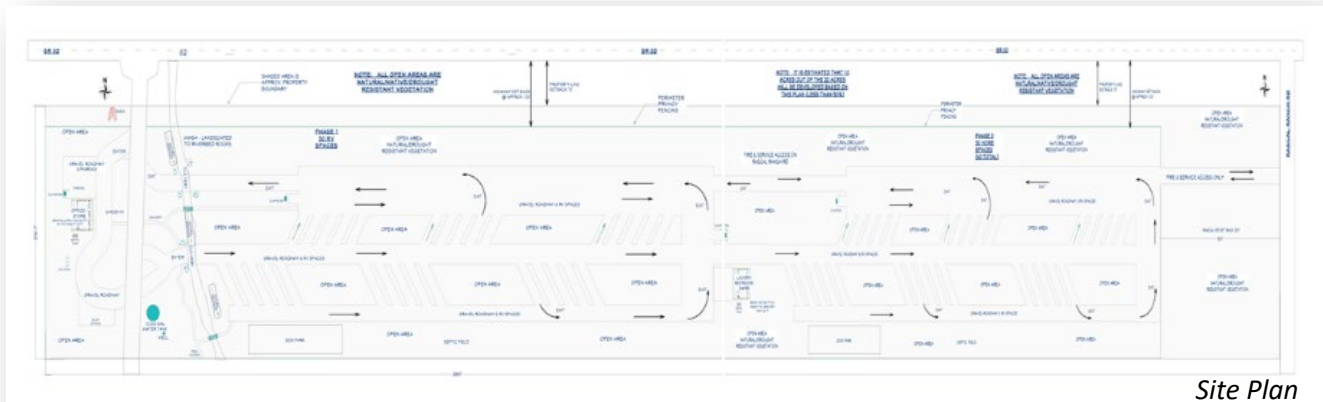
**8. Hazardous Materials: Not Applicable**

Hazardous or dangerous materials are not proposed for this special use.

**9. Off-Site Impacts: Complies**

This factor is intended to ensure adequate measures have been taken to mitigate off-site impacts such as dust, smoke, noise, odors, outdoor lighting, and traffic. See also Section 6 (Significant Site Development Standards):

- **Parking:** Off-site parking is not proposed. One space per RV is required, and Staff recommends minimum two-inch thick gravel surfaces to reduce dust. Driveways and parking areas must be properly drained to prevent collection of surface water.
- **Noise:** The RV park will operate seven days per week between 7am and 4pm with rules to limit noise outside regular business hours. While significant noise is unlikely, limited development within the area can amplify noise not otherwise tempered by Highway 82 traffic. Staff recommends quiet hours to ensure nearby residences, about nine within 1,250’, are not negatively impacted by evening and early morning activities.



- **Lighting and Signs:** Park lighting is subject to Section 2.45 of the zoning regulations which requires shielded fixtures and limits overall brightness. Outdoor lighting and signs will be evaluated during the permitting process. Given the property's location along a state highway, freestanding signs may be up to 80 ft<sup>2</sup> and 24' in height. Wall signs are also allowed. Signs are subject to a 25' setback from public rights-of-way and residential uses or zoning districts and are subject to a separate permit. Signs are subject to Section 2.54 of the zoning regulations.
- **Landscaping:** Landscaping installation and maintenance is not required for uses within Growth Areas C and D. However, perimeter solid screen is required per Section 2.51 of the zoning regulations. Staff recommends retaining perimeter vegetation as depicted on the concept plan.
- **Odors:** Dog parks are provided for visitor pets. Staff recommends a condition to require regular maintenance and upkeep of these areas. Other potentially offensive odors are unlikely given the number of spaces relative to parcel size and limited residential development nearby.
- **Traffic:** The site plan identifies two access points, primary access for employees, guests, and visitors is along Highway 82 and a secondary emergency/service entrance is proposed along Rascal Ranch Road. As a State highway, ADOT is the reviewing agency for new driveways, trip count analysis, and the need for off-site traffic improvements or dedications of public right-of-way along Highway 82. ADOT is recommending widening and hard surfacing the existing Highway 82 driveway apron. The speed limit along the property's frontage is 65mph.

#### **10. Water Conservation: Complies**

County water conservation requirements apply to non-residential uses and properties, including this project. Section 2.51.170 of the zoning regulations requires water saving strategies and applicable water conservation regulations and policies identified in the zoning regulations and comprehensive plan will be identified at permitting. The application identifies conservation strategies, including the use of native vegetation, rainwater harvesting, and automated irrigation and suggests minimal impact to adjacent wells at an estimated consumption of 24.1 acre feet/year.

#### **V. PUBLIC COMMENT**

Staff published legal notice, mailed notification letters to property owners within 300', and posted the property 6-18 December 2024. Staff has received written responses in opposition.

**VI. WAIVERS**

Section 2.15.030 of county zoning regulations states that manufactured home parks are subject to densities identified for each rural district. Density restrictions are not explicitly stated for recreational vehicle parks within rural district site development standards. Park size is estimated at 23 acres with 60 proposed spaces, increasing allowed density of one dwelling per 4 acres to 2.6 recreational vehicle spaces per acre or one space per 16,698SF. Remaining zoning district standards not superseded by Section 2.51.110 of the zoning regulations (*Mobile Homes, Manufactured Homes, and Recreational Vehicle Parks*) and applicable site development standards relating land clearing, outdoor lighting, signage, and outdoor storage remain applicable to development of the recreational vehicle park and will be reviewed during permitting.

**VII. SUMMARY AND CONCLUSION**

The applicant requests special use authorization approval for a 60-space recreational vehicle park on 23 acres along State Highway 82 west of Whetstone. Amenities include general store, laundry, restroom, and shower facilities, dog parks, and perimeter open space with natural vegetation. The site is bound by State Highway 82 to the north and State land to the south and west. Proposed hours of operation are 7am and 4pm seven days per week.

**Factors in Favor of Approval**

1. Complies with eight (8) of nine (9) applicable factors.
2. Business and high-density residential uses are typically appropriate along major thoroughfares, including highways and freeways.
3. Abutting State land to the west and south.

**Factors Against Approval**

1. Opposition from nearby property owners.
2. Potential disruption of southerly viewshed currently enjoyed by residents north of Highway 82.

**VIII. RECOMMENDATION**

Based on the factors in favor of approval, staff recommends approval of Docket SU24-21 to allow a 60-space recreational vehicle park subject to the following conditions:

1. Quiet hours shall be observed from 10pm to 6am seven days per week.
2. Park areas shall be kept in sanitary condition. Temporary refuse and animal waste receptacles shall be appropriately sized and designed so as not to create an attractive nuisance for wildlife or pests.
3. Obtain required ADOT permits and provide written confirmation from ADOT identifying required on or off-site improvements prior to applying for county development permits.

*\*Standard conditions related to condition acceptance, permitting timeframes, and special use modifications apply and have not been modified by this request.*

**Sample Motion**

Madam Chair, I move to approve Docket SU24-21 to allow a 60-space recreational vehicle park with conditions recommended by staff, the factors in favor of approval constituting the findings of fact.