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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: SU24-26 (Recreational Event Camping)
DATE: February 12, 2025

Docket SU24-26 (Recreational Event Camping)

A Special Use Authorization request for up to eight (8) recreational event camping events per year on 80 acres near Willcox.

I. DESCRIPTION OF SUBJECT PARCEL AND SURROUNDING USES

Applicant: Arizona Artistic LLC
Location: 6303 S. Covered Wagon Road
APN: 305-58-050 and 305-58-051
Property Size: 80 acres
Zoning: RU-10 (Rural District, one dwelling per 10 acres)
Plan Designation: Rural
Growth Area: D – Rural Areas
Existing Use: Storage Structures
Proposed Use: 8 Recreational Camping Events per Year

Surrounding Zoning and Uses

North	RU-10	Undeveloped, Single Family Residential
South	RU-4	Undeveloped, Single Family Residential
East	RU-10	Single Family Residential
West	RU-4	State Trust Land

II. SITE HISTORY

- Special event permits for past camping events (#SPE21-000002, #SPE22-000004, #SPE23-000001, #SPE24-000001, #SPE24-000008). Pending special event permit for planned April 2025 camping event (#SPE24-000010).
- Code compliance action in October 2023 (#23-003700 for outdoor storage, unpermitted structures, camping without use permit). The event was cancelled and the violation closed.

III. SPECIAL USE AUTHORIZATION REQUEST

The applicant requests a special use to have up to 8 recreational camping events per year. The county issued multiple special event permits between 2021 and 2024 for temporary events of 7 days or less. Event attendance ranges from 200-300 (attendees and volunteers) to over 1,000 for one major event typically held each year in April (Saguaro Man).

Event attendees bring their own food and water. Camping areas are divided into quiet areas and sound areas where participants play music. Sanitation is provided by portable toilets and handwashing stations pursuant to county requirements based on the number of total persons. These outdoor events include recreational vehicle and dry camping, art-related festivities, and recreational open burns.

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, seven (7) factors apply to this special use request with all applicable factors complying with conditions:

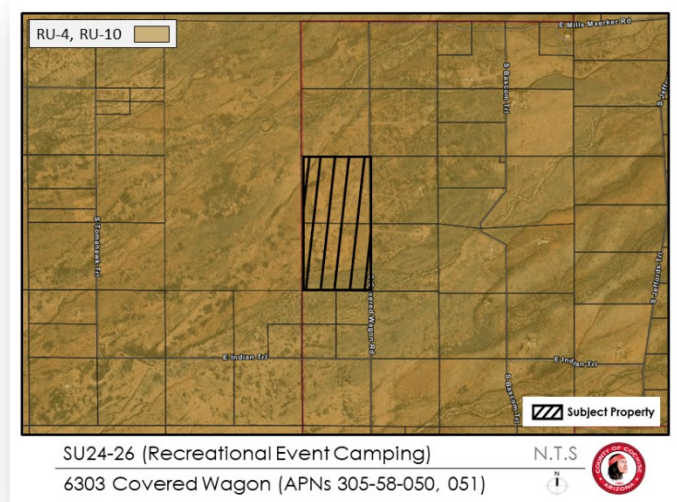
1. Compliance with Duly Adopted Plans: Complies

Comprehensive Plan designations for the property are Rural and Growth Area D (Rural Areas). These land use categories are characterized by sparsely populated areas with large lot sizes and large expanses of private and public lands. Agricultural uses are common as are developed or undeveloped recreational resources. This area, generally located about 20 miles southeast of City of Willcox jurisdiction, is characterized by single family residential development on lots ranging from 10 to 40 acres. The applicant is not requesting a rezone or Comprehensive Plan amendment for the 80-acre site, preserving existing land use designations and rural zoning classification.

2. Compliance with the Zoning District Purpose: Complies

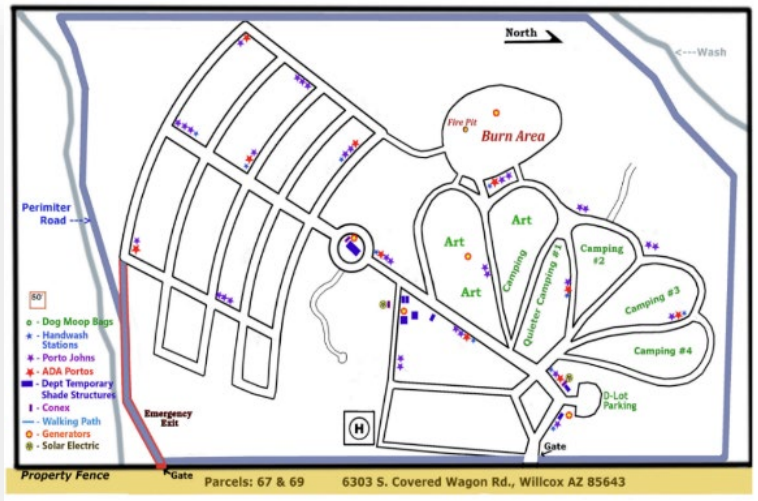
Rural districts allow non-residential activities that provide services serving local needs, recreational support services, and are generally compatible with rural living. These zoning districts, which range in site area from 2 acres to 36 acres, allow residential and non-residential uses compatible with an area's rural character. Per the zoning regulations, rural zoning districts may be appropriate for special uses "...that are inappropriate in more densely populated urban/suburban areas that may under some circumstances be appropriate in rural areas if designed to be sensitive to the general character of rural districts and natural environment and harmonious and in scale with existing development near the proposed site and in conformance with this Section." Special uses that may be described in these terms are fairgrounds or amusement parks, motion picture production sites, recreational facilities, transient camps, and zoos or animal exhibits.

The applicant requests special use authorization for recreational camping events. The county has issued five special event permits in the past for these events and encouraged the applicant to apply for a special use to secure land entitlements for these events in lieu of filing administrative applications for each event. Multiple events have occurred the past four years on 80-acres in an area with limited residential development, and the zoning regulations provide for more intense uses in rural districts through the special use process.



3. Development Along Major Streets: Not Applicable

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.



Covered Wagon Road is an unimproved rural local road not in county maintenance. The county recommends widening Covered Wagon Road from the subject properties to Cattle Drive (approximately two miles south) to prevent traffic congestion associated with past events. The county is not requiring improvements to Covered Wagon north of the subject property as subsequent roads (Mills Maerker and Butterfield Roads) are less accessible and less likely to be used by event goers, especially those using passenger cars or pulling recreational vehicles.

4. Traffic Circulation: Complies w/ Conditions

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.

Past camping events require the use of multiple county maintained roads most being rural local roads not designed to support event traffic counts on a regular basis. Property owners in the area have expressed concerns about high traffic volumes associated with events, particularly along Covered Wagon, where the narrowness of the road makes it difficult for two vehicles traveling in opposite directions to pass and where larger commerce-related vehicles have cancelled deliveries. Event traffic is commonly routed from Kansas Settlement Road (county-maintained Rural Major Collector) to Arzberger and Quick Silver Roads (county-maintained Rural Locals) then Cattle Drive (county-maintained Rural Local) to Covered Wagon Road, the only road along the route where two-way traffic is difficult. Staff recommends a condition of approval that requires widening Covered Wagon Road from the property to the nearest county-maintained road that can accommodate two-way traffic (Cattle Drive, two miles south).

5. Adequate Services and Infrastructure: Complies w/Conditions

The property is in a remote area without a well, septic system, or power. Access is limited to Covered Wagon Road, an unimproved local road. Events are "pack in, pack out" where recreational vehicles and

temporary structures are brought to the site and removed when events are over. Event organizers provide sanitation services (portable toilets, handwashing stations) as well as a first aid station.

The properties are not located within any fire district but are located within the City of Willcox subscription service area where the city's fire department may respond to an emergency for a contract-based fee. Staff recommends securing fire suppression services from the City of Willcox or other public or private provider given the property's lack of a permanent water source and widening Covered Wagon Road to mitigate issues involving event traffic on unimproved roads.



6. Significant Site Development Standards: Complies

Applicable development standards identified in Section 2.15 (*RU Districts*) apply to this property, including building setbacks, structure height, and site coverage as well as other site development standards related to floodplain management and stormwater mitigation. There are five small storage structures on the site, which are allowed in rural districts without a residence. These structures are in a central location on the property, well beyond the required 20' perimeter setbacks and away from washes at the north and south ends of the property which themselves require standoff distances of about 50'. The zoning regulations do not identify minimum standoff distances for the dedicated burn area on the west side of the property, approximately 180' from the property line shared with 320 acres of State Trust Land to the west. There are a dozen residences located within ½ mile of the subject properties with the nearest residences are located to the west within 1000'. The applicant's site plan demonstrates general compliance with applicable rural district developments standards and permanent structures are subject to those same standards.

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 ½ mile on December 16, 2024, receiving no responses in opposition.

8. Hazardous Materials: Not Applicable

Hazardous or dangerous materials are not proposed for this special use. Events involve campfires (3' in diameter or less) and open burns of non-habitable structures. A 500-gallon water tank is on-site to assist in extinguishing planned and unplanned fires, and staff recommends the applicant secure fire subscription services.



9. Off-Site Impacts: Complies

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

- Noise: Staff has received opposition to this special use, citing noise created by vehicles and loud music, and recommends a condition to limit noise levels during day and night hours. If noise is deemed a public nuisance by the Sheriff's Department a deputy may order noise causing activities to cease even if the noise meets special use conditions.
- Lighting: Low intensity lighting is used on-site during events and nearby property owners have expressed concerns about light brightness. Temporary and permanent lighting must comply with Section 2.45 of the zoning regulations relative to brightness and shielding.
- Odors and Smoke: Open burning is known to generate smoke. Burns are subject to permitting requirements and prohibited during Red Flag Warnings, potentially reducing off-site impacts.
- Parking: Adequate parking is available onsite for event attendees, volunteers, and coordinators. No off-site parking is proposed. The property is located in Growth Area D which does not require internal driveway improvements though the applicant proposes watering to reduce dust.
- Landscaping: Landscaping is not required for properties located in Growth Area D.
- Traffic: Event traffic has proven disruptive to area residences, especially along Covered Wagon Road which cannot accommodate two-way traffic in some areas. Staff recommends widening Covered Wagon to reduce traffic congestion and implementing dust control.

10. Water Conservation: Complies

County water conservation requirements apply to non-residential uses and properties. 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 are typically identified at permitting. The property does not have access to a public or private water source. Required water conservation measures will be identified during the building permit process when permanent improvements to the site are made.

V. PUBLIC COMMENT

Staff published legal notice, mailed notification letters, and posted the property between 13 and 23 January 2025.

VI. WAIVERS

None.

VII. SUMMARY AND CONCLUSION

The applicant requests special use authorization approval to allow outdoor recreational camping events. These events have occurred sporadically between 2021 and 2024 through the county's administrative special event application process. The applicant is requesting a permanent entitlement to allow up to 8 events per year, doubling the number of special events allowed by the zoning regulations. The property is partially cleared for camping areas and to allow vehicle movement, having a few storage structures in place. Otherwise, the property is without a well, septic system, or power. One major event is proposed in the Spring, typically April, while remaining events are smaller with fewer attendees and volunteers.

Factors in Favor of Approval

1. Complies with all seven (7) applicable factors with conditions.

2. Previous events with open burns (3 major, 2 minor) have not resulted in reported property damage.

Factors Against Approval

1. Opposition from nearby property owners.
2. Previous events have been disruptive to area residents relative to traffic, noise, lighting, and concerns about open burning.

VIII. RECOMMENDATION

Based on the factors in favor of approval, staff recommends approval of Docket SU24-26 to allow recreational camping events subject to the following conditions*:

1. Covered Wagon Road shall be widened to 24' from the property south to Cattle Drive. Control dust on Covered Wagon Road and on-site driveways during events.
2. A Floodplain Use Permit is required.
3. Noise levels at the parcel boundaries are limited seven days per week to 80dB(A) from 9am to 10pm; 50dB(A) from 10pm to 7am; and 55dB(A) from 7am to 9am.
4. Open burning shall comply with State and/or local jurisdiction permitting requirements. A copy of the permit shall be provided to the county prior to the event. Fires shall be constantly attended until extinguished and burned/unburned material shall be placed in a non-combustible container until removed from the site.
5. Open burns are prohibited during Red Flag Warnings.
6. Clean, dry wood shall be used for burns. Construction materials, rubber, plastics, or other forms of trash or refuse shall not be burned on-site. Refuse shall be stored in closed containers to avoid creating nuisances for nearby property owners or attracting wildlife.
7. A minimum of two access points providing both ingress and egress are required during events.
8. The number of portable toilets and handwashing stations shall meet county requirements.
9. Utilize City of Willcox or other vendor fire suppression subscription services during events with open burning.
10. An Emergency Evacuation Plan must be submitted to the county and updated annually.

**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 SU24-26 with conditions recommended by staff, the factors in favor of approval constituting the findings of fact.