



Development Services

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MEMORANDUM

TO: Cochise County Planning and Zoning Commission
FROM: Matthew Taylor, AICP, Planning Manager
FOR: Christine McLachlan, AICP, Director
SUBJECT: SU25-29 (Princess Palace RV Park)
DATE: December 10, 2025

Docket SU25-29 (Princess Palace RV Park)

A Special Use Authorization request to allow a recreational vehicle park.

I. DESCRIPTION OF SUBJECT PARCEL AND SURROUNDING USES

Applicant: Debra Whitaker
Location: 10477 N. Princess Palace Way (Elfrida)
APN: 403-58-001
Property Size: 38.8 acres
Zoning: RU-4
Plan Designation: Rural
Growth Area: D – Rural Areas
Existing Use: Residential
Proposed Use: Residential, RV Park

Surrounding Zoning and Uses

North	RU-4	Undeveloped
South	RU-4	Undeveloped
East	RU-4	Undeveloped
West	RU-4	Undeveloped

II. SITE HISTORY

- 2002-2003: Residence (900sf), accessory building (400sf), and septic system

III. SPECIAL USE AUTHORIZATION REQUEST

A Special Use Authorization request to allow a recreational vehicle park with office containing guest restrooms and showers.

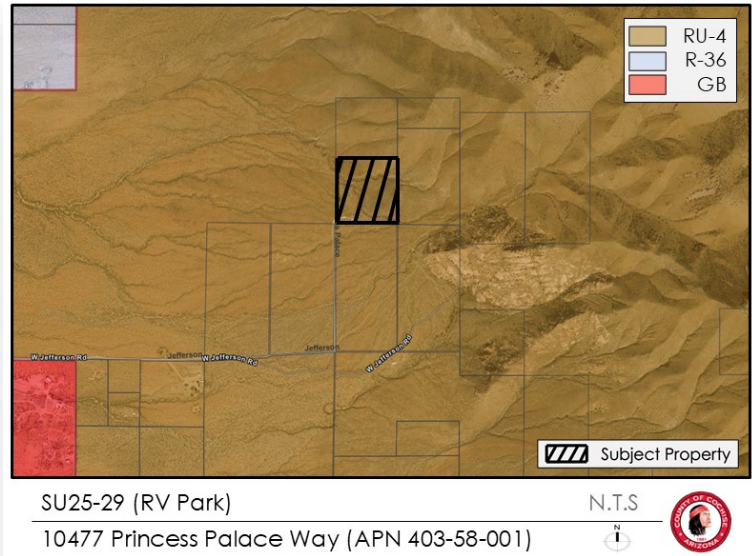
IV. ANALYSIS OF IMPACTS – COMPLIANCE WITH SPECIAL USE FACTORS

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

The subject property is designated “Rural” by the Comprehensive Plan and falls within Growth Area D (Rural Areas), and the property’s RU-4 zoning is consistent with both Plan designations. Intense, non-residential land uses requiring rezoning to a more intense zoning district or special use approval may not be appropriate. Business uses serving a local area and its residents may be appropriate, however. Non-residential development in rural areas may be geared towards local services, tourism, or otherwise less intense uses not appropriate in more dense areas.



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. Rural zoning districts encourage land uses compatible with rural living and, in some instances, 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. The zoning regulations specifically identify RV parks as an allowed use with approval of a special use authorization in rural zoning districts. 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.”

3. Development Along Major Streets: Not Applicable

This factor encourages reduction in the number of access points along major thoroughfares, arterial streets, and county collector roads by using frontage roads, shared access, no access easements, and other measures. Property access is limited to Princess Palace Way, an unimproved road outside of County maintenance. Princess Palace connects to Jefferson Road, a Rural Minor Collector (county maintenance ends about one mile west of Princess Palace Way). A county right-of-way permit is not required; however, Princess Palace Way, a 40’ wide public easement, must be widened to a minimum of 24’ and maintained to accommodate commercial traffic.

4. Traffic Circulation: Not Applicable

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 property takes access from Princess Palace Way which is a 40’ public easement outside of County maintenance. Jefferson Road intersects with Princess Palace and is maintained by the County and classified as a Rural Minor Collector. Jefferson Road, from Princess Palace west about one mile, is a primitive road outside County maintenance that is maintained by a private property owner. As a condition of the special use, Princess Palace should be widened to 24’ and maintained to accommodate expected commercial traffic associated with the RV park.

5. Adequate Services and Infrastructure: Complies

The site is generally off-grid, being served by solar, propane and on-site water tanks holding hauled water. The applicant proposes similar services for the RV park.

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 not requested waivers from applicable development standards. Comparative analysis of Sections 2.15 and 2.51 is in the table below:

<u>STANDARD</u>	<u>2.15 (RURAL DISTRICTS)</u>	<u>2.15 (RV PARKS)</u>
Minimum Development Area	4 acres	No minimum
Density	One dwelling per 4 acres	Max allowed density is 9 spaces.
Perimeter Setback	20’	7.5’ between spaces, 10’ within park boundary
Maximum Building Height	30’ (principal and accessory buildings)	30’ (principal structures) / 20’ (accessory structures) / 8’ fences and walls
Maximum Site Coverage/Open Space	25%/0%	Site coverage 55% per space and for park, 75% for recreational areas. 10% dedicated to recreational facilities.
Principal Building Separation (include RVs)	15’	15’
Parking/Circulation	1 parking space per pad	1 per RV space. Internal 24’ two drives, 12’ one way drives.
Landscaping/Screening	Category D (Rural Areas): 6’ solid screen when abutting rural residential	6’ solid screen (fence, wall, vegetative equivalent)
Street Access	Access from public and/or private roads	Access to perimeter streets via designated park entrances only

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 mailed notices to property owners within 1,500’ on August 27, 2025, stating in the application that one nearby property is not opposed to the RV park.

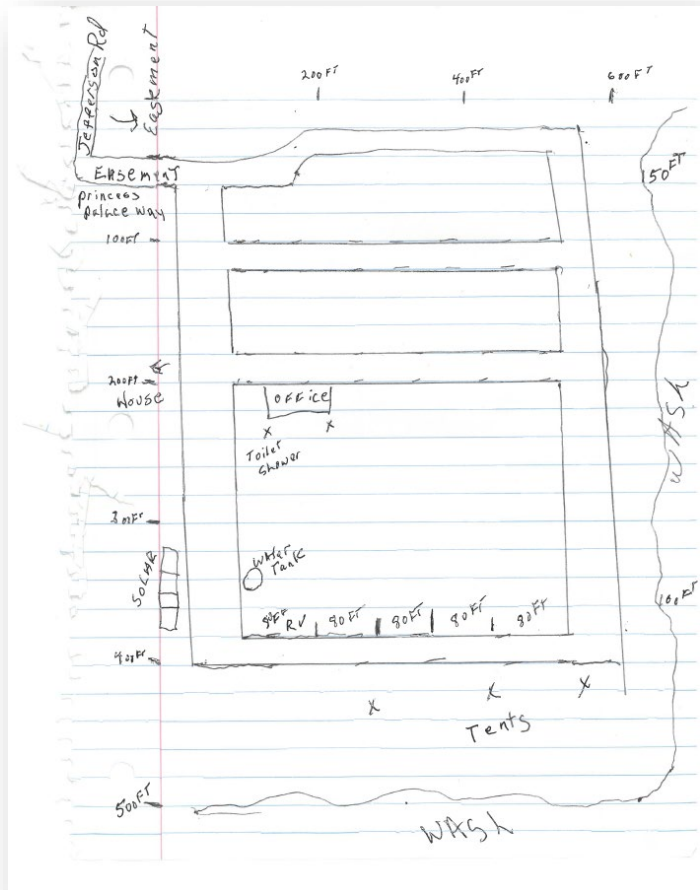
8. Hazardous Materials: Not Applicable

Hazardous 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 noise, outdoor lighting, odors, smoke, traffic, and dust:

- Noise: Staff recommends quiet hours as with most RV parks in rural settings as there are other residences in the area.
- Lighting: The applicant has not proposed lighting the RV park. Outdoor lighting is subject to Section 2.45 of the Zoning Regulations relative to brightness and shielding.
- Odors and Smoke: Significant odors and smoke are unlikely as is the case with non-residential uses but measures should be taken to reduce risk of fire.
- Parking: The Zoning Regulations require a minimum of one parking space per RV space. The property is in Growth Area D which does not require improved parking areas.
- Landscaping: Staff recommends retaining as much native vegetation on the site as possible, including replacement of cleared vegetation within the RV park boundary. Growth Area D (*Rural Areas*) does not otherwise require landscaping.
- Traffic: Staff recommends a condition to widen Princess Palace to at least 24' in width to accommodate two-way traffic traveling to and from the proposed RV park.



10. Water Conservation: Not Applicable

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 site currently utilizes hauled water stored in tanks, and the applicant estimates up to 500 gallons per day for the proposed RV park not including current residential water use.

V. PUBLIC COMMENT

Staff mailed notices to property owners within 1500', published legal notice, and posted the property October 17-November 19, 2025, with no responses to date.

VI. WAIVERS

None.

VII. SUMMARY AND CONCLUSION

The applicant requests special use authorization for a recreational vehicle park with office and restroom/shower facilities for guests. The property is located in a remote area off of Jefferson Road about 6.5 miles east of U.S. Highway 191.

Factors in Favor of Approval

1. Complies with seven (7) applicable factors.
2. Clustered, low impact residential use.
3. No opposition from nearby property owners.

Factors Against Approval

1. Princess Palace Way and the portion of Jefferson Road near the subject property are primitive roads and not conducive to commercial traffic.

**VIII. RECOMMENDATION**

Based on the factors in favor of approval, staff recommends approval of Docket SU25-29 to allow a recreational vehicle park with the following conditions:

1. RV park is limited to 9 spaces, including tents and portable shelters.
2. A signed private maintenance agreement is required for the improvement and ongoing maintenance of the unpaved portion of Jefferson Road and Princess Palace Way prior to the issuance of a change of use permit. This shall remain in effect for the duration of the special use.
3. Princess Palace Way shall be widened to 24' and maintained.
4. Quiet hours are observed 10pm to 6am seven days per week.
5. Park areas are kept in sanitary condition to prevent attracting wildlife or pests.
6. Perimeter open space shall be retained, and existing vegetation shall be replaced or supplemented with native, drought-tolerant vegetation as needed.
7. Within 30-days of approval of the Special Use, the applicant shall provide the County a signed Acceptance of Conditions form and a Waiver of Claims form arising from ARS Section 12-1134. Prior to operation of the Special Use, the applicant shall apply for a building/use permit for the project within 12-months of approval. The building/use permit shall include a site plan in substantial conformance with the approved special use concept plan, the completed Special Use permit questionnaire and application, and appropriate fees. A permit must be issued within 12-months of the Special Use approval otherwise, the Special Use may be deemed void upon 30-day notification to the applicant.

8. It is the applicant's responsibility to obtain any additional permits, or meet any additional Conditions, that may apply to the proposed use pursuant to other federal, state, or local laws or regulations.
9. Any changes to the approved Special Use will be considered a Modification to this Special Use and will require review and approval of the Planning and Zoning Commission.

Sample Motion

I move to approve Docket SU25-29 with conditions recommended by staff, the factors in favor of approval constituting the findings of fact.
