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MEMORANDUM

TO: Cochise County Planning and Zoning Commission
FROM: Matthew Taylor, AICP, Planning Manager
FOR: Christine McLachlan, AICP, Director
SUBJECT: SU25-33 (Palominas Communications Tower)
DATE: February 11, 2026

Docket SU25-33 (Palominas Communications Tower)

A Special Use Authorization request to allow a communications facility with 65' monopole and ground equipment.

I. DESCRIPTION OF SUBJECT PARCEL AND SURROUNDING USES

Applicant: CitySwitch DevCo 1, LLC c/o Terra Consulting Group
Location: Southeast Corner of Highway 92 and Coronado Memorial Road (Palominas)
APN: 104-54-010C
Property Size: 784 acres (project site less than one acre)
Zoning: RU-4
Plan Designation: Rural Density Residential
Growth Area: D – Rural Areas
Area Plan: Southern San Pedro Valley Area Plan
Existing Use: Horse Rescue, Grazing
Proposed Use: Horse Rescue, Grazing, Communications Facility

Surrounding Zoning and Uses

North	RU-4	Valley View Elementary School
South	RU-4	Undeveloped
East	RU-4	Undeveloped, Low Density Residential
West	RU-4	Undeveloped, Low Density Residential

II. SITE HISTORY

The site has numerous structures and a lengthy permit history.

III. SPECIAL USE AUTHORIZATION REQUEST

A Special Use Authorization request to allow a communications facility with 65' monopole and associated ground equipment. The lease area totals 2,500 square feet (50' X 50') and is located along Coronado Memorial Road about 470' south of Highway 92.

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, eight (8) factors apply to this special use request with all applicable factors complying with conditions:

1. Compliance with Duly Adopted Plans: Complies

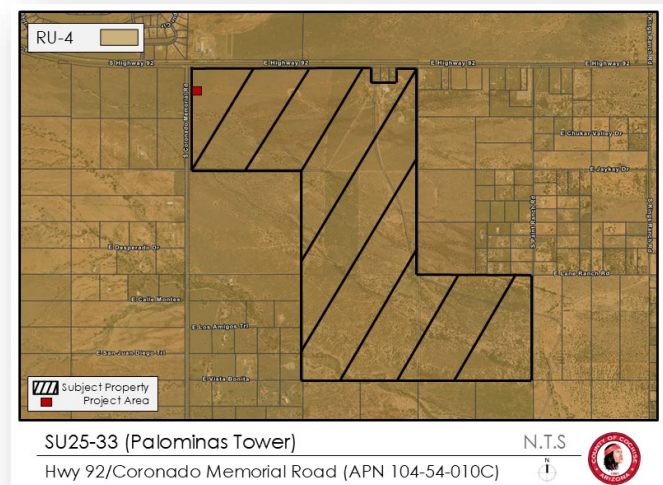
The subject property is designated *Rural Residential* by the Comprehensive Plan and falls within *Growth Area D (Rural Areas)*, and the property's existing Rural zoning is consistent with Plan designations. Communications facilities are permitted by right in Rural districts provided the tower or tallest structure within the facility does not exceed 30' in height.

Rural Residential is characterized by areas with a defined pattern of residential development on larger lots of two acres or more. Rezoning and special use requests that do not directly serve the residents are not considered generally appropriate. The Palominas community specifically and Hereford area more generally continues to develop as a suburban-rural interface with an increasing number of residences and need for non-residential development, services, and infrastructure. The *Plan* encourages new development be served by adequate services that is commensurate with growth area designations.

The *Southern San Pedro Valley Area Plan*, adopted in 2001, serves to guide "how the community chooses to direct residential and business development in order to respect and maintain the existing scenic quality, rural character and natural resources of the plan area." The *Plan* contains land use goals specific to special uses in RU-4 noting they are acceptable if they do not generate off-site negative impacts. The *Plan* identifies several "appropriate" special uses, including the following:

- Resorts, guest ranches, and group camps
- Rural density RV parks/camp grounds
- Welfare and charitable uses
- Recreational uses designed to primarily serve the plan area
- Cultural, historic and nature exhibits
- Small scale residential care facilities
- Cemeteries
- Child care facilities designed to primarily serve the plan area
- Commercial plant nurseries
- Observatories
- Veterinarian clinics, boarding kennels
- Agriculture related businesses such as feed stores, riding stables, roping arenas

The *Plan* identifies future land use for the subject property as "*Rural Density Residential & Grazing Land*" which accurately describes the existing use and size of the property. The proposed communications facility



will not substantially alter the primary use of the property but will expand mobile phone service availability and quality in the Palominas area.

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. Permitted non-residential uses include:

- Agricultural Processing
- Churches or places of religious worship
- Civic, Social, Fraternal, or Business Associations (approved as part of a subdivision)
- Communications Towers to a maximum height of 30'
- Community Gardens
- Custom Butchering/Curing/Processing (with minimum 100' setback)
- Day Care Facilities
- Emergency Vehicle Stations
- Farmers Markets
- Grocery Stores (excluding gasoline sales) and Agricultural-Related Sales
- Mobile/Manufactured Home Parks
- Recreation Facilities (Indoor/Outdoor, approved as part of a subdivision)
- Residential Care Homes
- Riding Stables (Commercial)
- Utility Installations
- Veterinary Clinics and/or Animal Hospitals

Services and infrastructure are needed in the County's rural areas, including facilities providing mobile phone services. The Zoning Regulations authorize the communication and utility services in Rural zoning districts and are commonly found in such districts, including the most prominent county-wide district (RU-4). Communications facilities cannot be regulated locally because of perceived health risks pursuant to the 1996 Telecommunications Act but are instead regulated by the Federal Communications Commission (FCC) relative to radio frequency emissions. The County can, however, evaluate the appropriateness of these facilities with respect to compatibility with established surrounding land uses.

3. Development Along Major Streets: Complies

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. The subject property has established access along Highway 92, which is designated by the County as a Rural Major Collector and under the jurisdiction of the Arizona Department of Transportation (ADOT) jurisdiction. The project site will instead take access from Coronado Memorial Road which is also designated as a Rural Major Collector. A County right-of-way (ROW) permit is as access to meeting commercial standards, including an apron that meets or exceeds the existing surface of Coronado Memorial Road (double bituminous surface).

4. Traffic Circulation: Complies

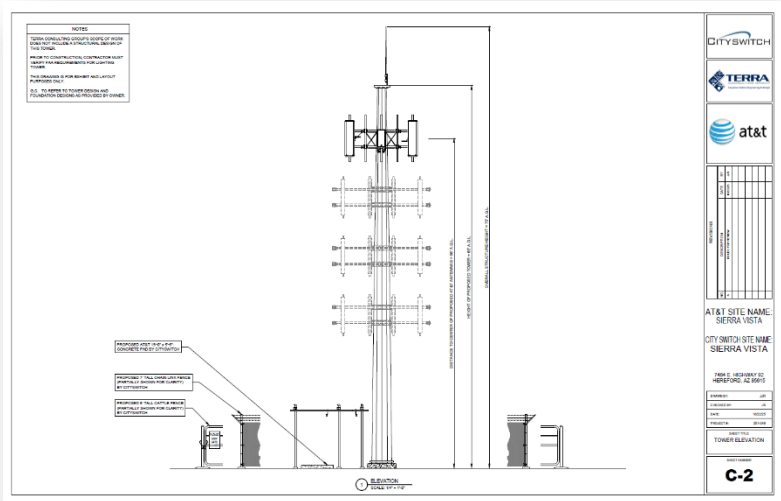
This Special Use Authorization factor stipulates:

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 project site has direct access to Coronado Memorial Road, a Major Rural Collector, and a County ROW permit is required to establish a new, permanent driveway. The proposed special use will not impact existing road classifications, utilize residential streets, or require ROW dedications or off-site improvements.

5. Adequate Services and Infrastructure: Complies

The site is located within the Sulphur Springs Valley Electric Cooperative (SSVEC) and Palominas Fire District service areas. The nearest fire station is located about one mile west at 10202 Highway 92 (Station #3). Station #2 is located about 3 miles to the east at 9695 Highway 92.



6. Significant Site Development Standards: Complies

Per Section 2.15 of the Zoning Regulations, communication towers are an allowed use in Rural zoning districts provided they do not exceed 30’ in height. When exceeding 30’, Special Use approval is required and development standards specific to these facilities identified in Section 2.51.120 are applicable:

1. **Existing Towers.** A communication tower in existence prior to the effective date of the 1999 revised Zoning Regulations will not require a Special Use or building permit if located in an applicable Zoning District.

Staff comment: Does not apply.

2. Design.

- All new communication facilities will be designed by a Registrant licensed by the State of Arizona.
- For towers up to 150 feet in height, the structure shall be designed to accommodate at least two providers.
- For towers greater than 150 feet in height, the structure shall be designed to accommodate at

least three providers.

Staff comment: Waivers not requested. Design requirements and co-location capacity will be verified at permitting.

3. Certification.

- Affidavits will be provided to show conformance with all Federal Aviation Administration (FAA) requirements regarding lighting and marking so as not to create a hazard to air navigation.
- Affidavits will be provided to show conformance with all Federal Communications Commission (FCC) technical emissions standards and licensing requirements, including radio frequency data.
- Prior to permit issuance for new communication equipment on an existing tower, a certificate, report, or plan prepared and stamped by an Arizona-Registered Professional Engineer will be provided by the Applicant that indicates the equipment and tower will meet minimum safety standards regarding deflection and survival specs at the proposed antenna load and with regard to potential electrical hazards.

Staff comment: Waivers not requested.

- 4. Setbacks.** Communication facilities must be setback from all parcel boundaries, lease boundaries, and rights-of-way at a distance equal to at least the height of the tallest structure in the facility, measuring from its base. No setbacks are required between communication facilities located on the same parcel.

Staff comment: The proposed project site meets required setbacks to property boundaries and public rights-of-way as demonstrated on the site plan; however, the applicant requests a waiver to reduce setbacks within the 2,500 square foot lease area from 65' to 25' for the monopole and to 2.5' for supporting ground equipment. The project area would have to measure at least 130' X 130' or ~17,000 square feet to provide enough land area where the required setbacks could be met. Lease areas relative to tower height are common as facilities tend to be compact with small building footprints [a waiver was also requested for the most recent facility considered by the Commission, requesting setback reductions within the lease area, to property boundaries, and to edge of public ROW (SU23-30)].

- 5. Minimum Site Area Requirements.** Communication facilities will be exempt from the Zoning Districts' minimum site area requirements.

Staff comment: Facility lease areas are not subject to minimum zoning district parcel size requirements. Existing project area is 2,500 square feet on a parcel exceeding 780 acres.

- 6. Maximum Height.** In those Zoning Districts where communication towers are a permitted use, the towers shall be limited to the maximum allowable height of the Zoning District unless otherwise noted in that District. There shall be no limit to the requested maximum height of a tower seeking approval through the Special Use Authorization process.

Staff comment: RU-4 allows communication facilities by right if the tower or tallest

equipment within the facility does not exceed 30'. Communication towers exceeding a height of 30' require special use authorization approval. The applicant proposes a monopole of 65'.

- 7. Noise or Vibration.** No noise or vibration (other than normal vehicular traffic) will be permitted, which is discernible on neighboring residential sites to the unaided human senses for three minutes or more duration in any one-hour of the day between the hours of 7:00 a.m. and 7:00 p.m. or 30-seconds or more duration in any one hour between the hours of 7:00 p.m. and 7:00 a.m.

Staff comment: Noise and vibrations are unlikely after the site is constructed and operational. Waivers not requested.

- 8. Removal of Abandoned Communication Facilities.** Any facility that is not operated for a continuous period exceeding twelve months will be considered abandoned, and the owner of such facility will remove the structure(s) within 90-calendar days of receipt of notice from the County Zoning Inspector.

Staff comment: Waivers not requested.

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 1,000' on December 5, 2025, receiving two responses in opposition.

8. Hazardous Materials: Not Applicable

The use or storage of hazardous materials are not proposed.

9. Off-Site Impacts: Complies

The proposed facility is not expected to generate off-site impacts such as noise, odors, or vibrations though short-term impacts may occur during construction. The County cannot consider public health during review but can consider land use computability, specifically location appropriateness, potential visual impacts, design, and zoning compliance.



The nearest residence is located about 2,000 feet to the southwest (6677 E. Gunpowder Trail) with more significant rural residential development about ½ mile to the south along Desperado Drive, Lone Oak Road, Calle Montes, and Los Amigo Trail and about ¾ miles to the west along Stone Ridge and Indigo Sky Roads. The closest residential development is King's Ranch at Coronado to the north across Highway 92. Residences within this development are within ¼ mile of the proposed project site and share a property

Factors Against Approval

1. Opposition from nearby property owners.
2. Waiver request to reduce required setbacks within leased project area.

VIII. RECOMMENDATION

Based on the factors in favor of approval, staff recommends approval of Docket SU25-33 to allow a communications facility with 65' monopole with the following conditions:

1. The proposed monopole shall not exceed a height of 65'.
2. The monopole shall be at least 25' and supporting ground equipment shall be at least 2.5' within all lease area boundaries.
3. 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 18 months of approval or within time limits specified by the Planning and Zoning Commission.
4. 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.
5. Any changes to the approved Special Use will be considered a Modification to this Special Use and may require re-hearing before the Planning and Zoning Commission.

Sample Motion

I move to approve Docket SU25-33 with conditions recommended by staff, the factors in favor of approval constituting the findings of fact.
