

4G Farms  
SPECIFIC PLAN

April 2022

# 4G Farms Specific Plan

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*Submitted to:*

Pima County Development Services Department  
201 North Stone Avenue  
Tucson, Arizona 85701

*Prepared for:*

4<sup>th</sup> Generation Farms  
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Appendix A: Boundary & Topographic Survey



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## I. INTRODUCTION & POLICY

### A. Introduction

4th Generation Farms (“4G Farms” or “Owner”) owns approximately 5 acres of agricultural land on N. Reservation Road in the Avra Valley area of unincorporated Pima County (“County”), Assessor Parcel Numbers 208-45-004A and -005B. (See Exhibit I.A: *Regional Location Map*.) 4G Farms is proposing to expand their existing agricultural uses on the Property to include Cannabis Cultivation (the “Project”) in accordance with Arizona’s adult-use cannabis program. . The use would be considered an “off-site” Cannabis Cultivation that would be separated physically from but within the licensing of a licensed Dispensary as defined in State law and regulations.

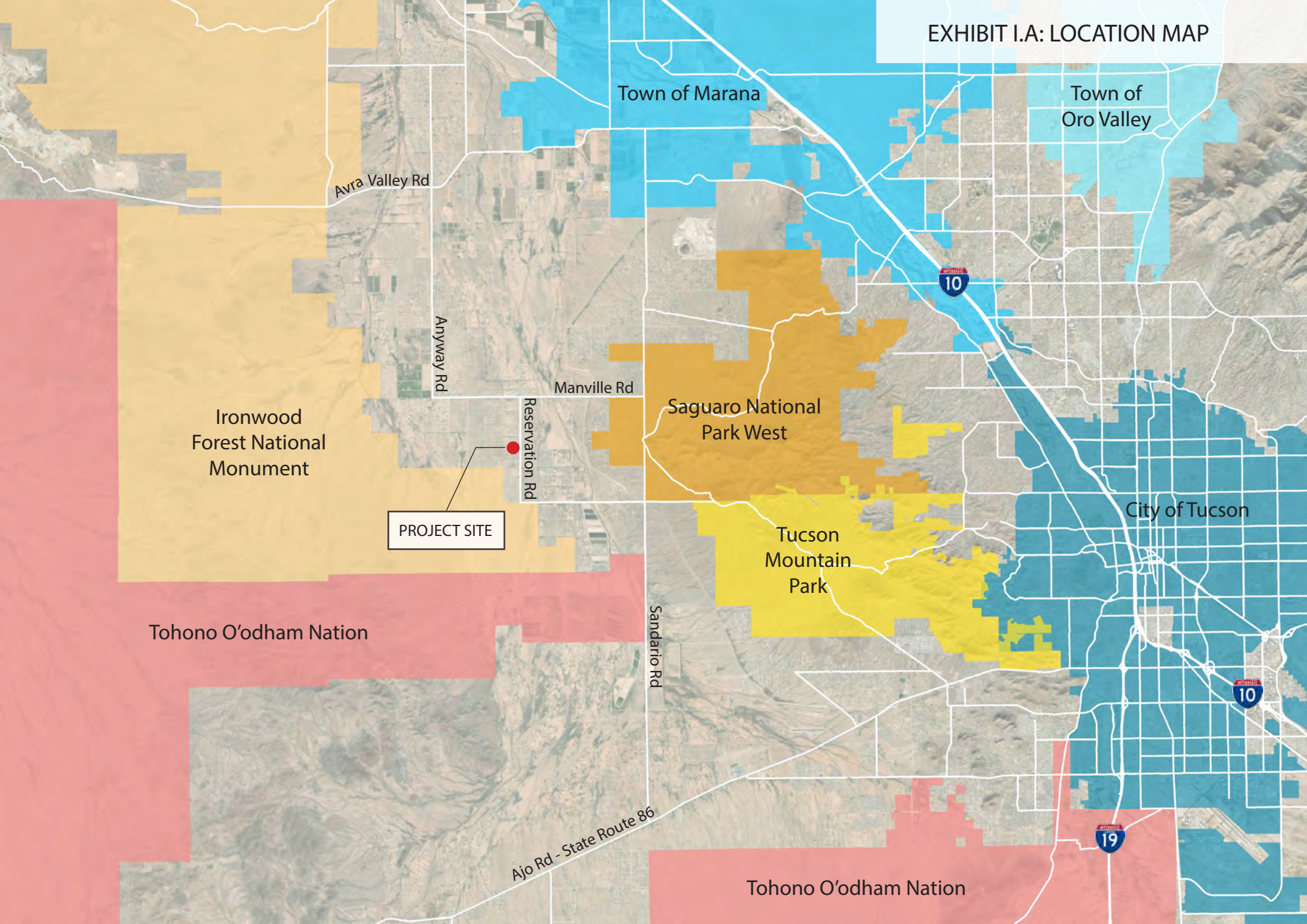
In 2010, Arizona voters approved a ballot initiative establishing a medical marijuana program. In November 2020, Arizona voters went a step further and approved the Smart and Safe Arizona Act (Proposition 207), which legalized the possession and use of marijuana for adults 21 years and older. Proposition 207 also permits additional licensing of Dispensaries to include off-site Cultivation sites as part of the Dispensary license.

The Pima County Zoning Code (“PCZC”) currently limits marijuana cultivation to CB-2 zone. Given the Property’s location and rural setting, a rezoning request to CB-2 to permit marijuana cultivation without on-site dispensary use is not appropriate. Instead, 4G Farms has opted to prepare a specific plan, which will ensure the Property will function in a manner similar to other crop production operations in a rural agricultural setting and in conformance with Proposition 207 and Arizona Department of Health Services (“DHS”) regulations and guidelines. The 4G Farms Specific Plan (“Specific Plan”) establishes Cannabis Cultivation as a permitted use on the Property and provides development standards that appropriately recognize the character of the Property’s location and surrounding uses.

As established in State law and regulations, 4G will operate its Cannabis Cultivation within the approval and licensing of a DHS licensed and approved Dispensary. All requirements for operation and security of the Property will be met, including (but not limited to) all activities located within a secure building, controlled access to the Property and any buildings, security cameras inside and outside of buildings, and all requirements for registration and transportation of product. It is expected that transportation will be no more frequently than once every 2 weeks by secure vehicle. The Property meets all spacing requirements for distance from schools, parks, libraries or any other uses as it is completely surrounded by City of Tucson owned land being used for water recharge. Pursuant to the Specific Plan regulations, 4G will also submit an odor mitigation plan to the County as part of its building permit submittal to demonstrate appropriate air filtration systems.



EXHIBIT I.A: LOCATION MAP



4G Farms - 3601 N. Reservation Road



0 1 2 4 Miles



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## B. Pima Prospers

The 4G Farms Specific Plan is consistent with the intent of the Low Intensity Rural (“LIR”) designation, as well as the goals and policies of *Pima Prospers*. The following policies from *Pima Prospers* are relevant and support this Specific Plan:

### 1. Use of Land

#### a. *Land Use Element*

- **Policy 3.1.1.4:** Support land uses, densities, and intensities appropriate for the urban, suburban, and rural areas of the unincorporated County.

#### b. *Environmental Element*

- **Policy 3.4.1.7.b:** The following Conservation Guidelines apply to Agriculture In-Holdings within the Conservation Lands Systems (“CLS”):
  - Development within these areas will be configured in a manner that does not compromise the conservation values of adjacent and nearby CLS lands.

The CLS designation on the Property is “Agricultural In-Holdings”, which are areas where active, or abandoned, agriculture lands exist within the CLS. The Property will continue to feature agricultural uses, which is an appropriate intensity for its location in rural unincorporated Pima County and will not compromise conservation values on nearby CLS lands.

#### c. *Housing and Community Design Element*

- **Policy 3.5.14.:** Encourage cost-effective green building and site design methods, techniques and materials.
  1. Decrease heat island effect and reduce water run-off through site development strategies.
  2. Reduce outdoor water use by encouraging water-efficient practices such as:
    - a. Low water use, drought-tolerant or native vegetation (xeriscapes) with the exception of local food production;
    - b. Drip irrigation;
    - c. Increase use of reclaimed water and rainwater harvesting; and
    - d. Low Impact Development (LID) principles such as preserving and recreating natural landscape features and minimizing effective imperviousness to create functional and appealing site drainage that treat stormwater as a resource rather than a waste product where applicable and feasible.
  3. Reduce indoor water use by installing water-efficient fixtures and appliances.
  4. Increase building energy efficiency by encouraging active and passive solar methods of construction.



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The Project will feature a variety of energy-efficient, green building and site design elements that are supported by Pima Prosper. These approaches include:

- East/west building orientation to take advantage of solar exposure.
- Insulated metal panels will provide high R-value wall and roof assemblies and avoid thermal bridging between inside and outside.
- Metal building employs over 90% recycled steel content.
- High-efficiency LED lighting throughout.
- High Seer air conditioning systems.
- Water from dehumidifiers within the grow areas to be reused in the facility and landscape.
- Low-water-use plumbing fixtures.
- Metal roof and wall panels will be Low-Albedo with a High Solar Reflectance to provide a “Cool Enclosure System” to reduce the heat island effect.
- Rainwater will be collected and directed to landscape areas for plantings and recharge back into the ground.
- Use of pervious hardscape and porous paving systems, where possible.

## 2. Physical Infrastructure

### a. *Energy Element*

- **Policy 4.3.1:** Support the increased use of cost-effective clean alternative energy systems.
  - Policy 5: Encourage residential and nonresidential development to maximize the use of solar energy systems on individual sites and throughout the development and incorporate the consideration of access to incident solar energy.
  - Policy 6: Encourage the use of passive solar to reduce overall energy demand.
  - Policy 7: Mitigate urban heat island effect by reducing paved areas, increasing shade and applying other methods, where practical.

As indicated in the section above, the Project will incorporate a number of cost-effective, clean, alternative energy strategies.

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## II. LAND USE PROPOSAL

### A. Project Overview

In response to the opportunities presented by the passage of the Smart and Safe Arizona Act, 4G Farms is proposing to transition its existing agricultural activities on the Property to include Cannabis Cultivation, in accordance with Arizona's adult-use marijuana program. The Project is intended to implement in two phases. Phase 1 improvements include the construction of a 43,500 square-foot agricultural crop production building utilizing new automated vertical farming methods. Phase 1 will also include the following site improvements:

- Grading and the import of fill across the Property.
- Installation of retention basins.
- Construction of a gravel fire access lane and gravel parking areas.
- Installation of perimeter fencing and security gates.
- Incorporation of refuse collection facilities.
- Relocation of an existing overhead electrical power line.
- Addition of a sewer septic system.
- Addition of water tank for domestic water and fire suppression.

Phase 2 will involve the construction of a second (attached) 43,500 square-foot metal crop building, thereby doubling the Project building square footage to 87,000 square feet. While the Phase I and possibly Phase II improvements may be constructed with approved agricultural uses permitted in County Rural Homestead (RH) zoning prior to this Specific Plan adoption, Cannabis Cultivation will not be permitted until this Specific Plan is approved.

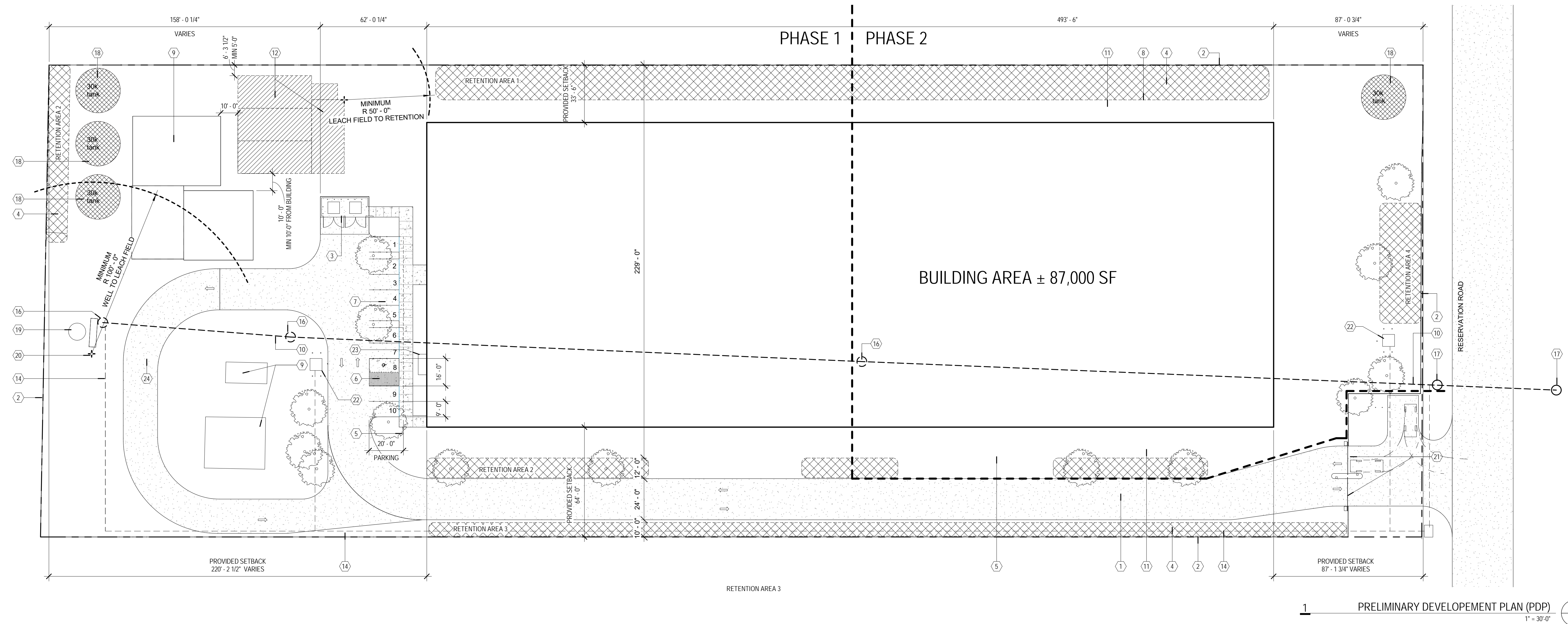
The existing storage buildings and caretaker's residence located at the west end of the Property and totaling approximately 6,700 square feet will remain. The metal frames that once supported two greenhouses on the Property will be removed.

All site improvements from both Phase 1 and Phase 2 are illustrated on *Exhibit II.A: Preliminary Development Plan*.

### B. Specific Plan Definitions

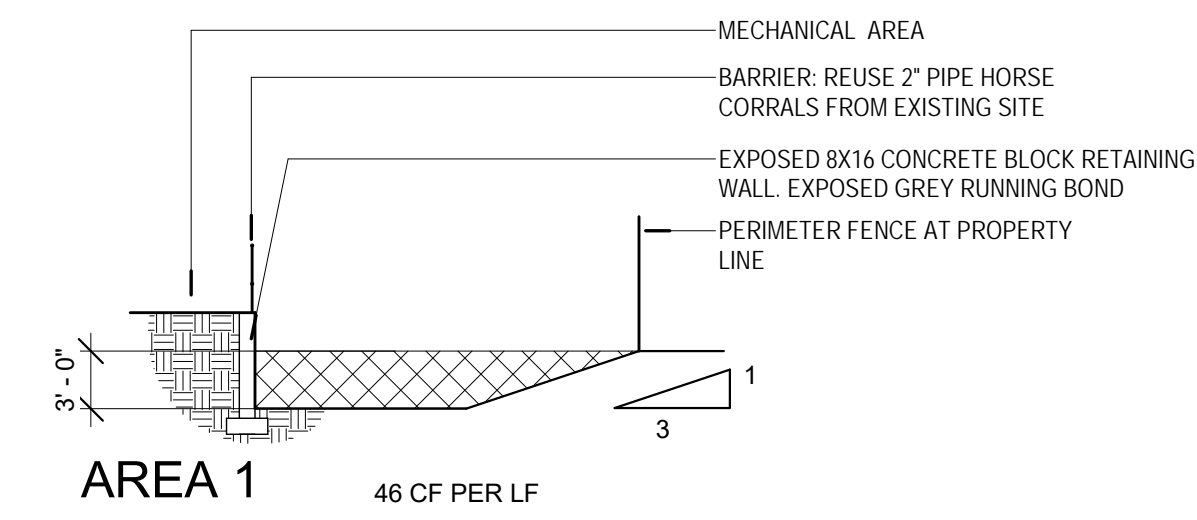
Cannabis (or Marijuana) Cultivation: any activity involving the cloning, planting, growing, harvesting, drying, curing, grading, trimming, packaging, infusing, extracting or otherwise processing of cannabis plants or any part thereof. Product sales are not part of the cultivation use.



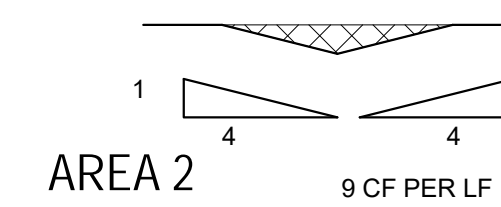


- KEYNOTES**
- 1 GRAVEL DRIVEWAY
  - 2 8' HIGH PERIMETER SECURITY FENCE
  - 3 TRASH + RECYCLING
  - 4 RETENTION BASIN
  - 5 CONCRETE SIDEWALK
  - 6 ACCESSIBLE PARKING WITH CONCRETE AT PARKING AND AISLE AREA
  - 7 PARKING
  - 8 BARRIER FENCE AT MECHANICAL YARDS
  - 9 EXISTING BUILDINGS + STRUCTURES TO REMAIN
  - 10 OVERHEAD ELECTRICAL TO BE RELOCATED UNDERGROUND
  - 11 MECHANICAL AREA
  - 12 NEW SEPTIC TANK, PRIMARY AND RESERVE LEACH FIELDS
  - 14 NEW UNDERGROUND ELECTRIC SERVICE
  - 16 EXISTING POWER POLE TO BE REMOVED
  - 17 EXISTING POWER POLE
  - 18 NEW WATER TANK
  - 19 EXISTING WATER TANK
  - 20 EXISTING WATER WELL/PUMP
  - 21 AUTOMATIC GATE
  - 22 TRANSFORMER
  - 23 ELECTRICAL SERVICE ENTRANCE SECTION
  - 24 ONE WAY DRIVE

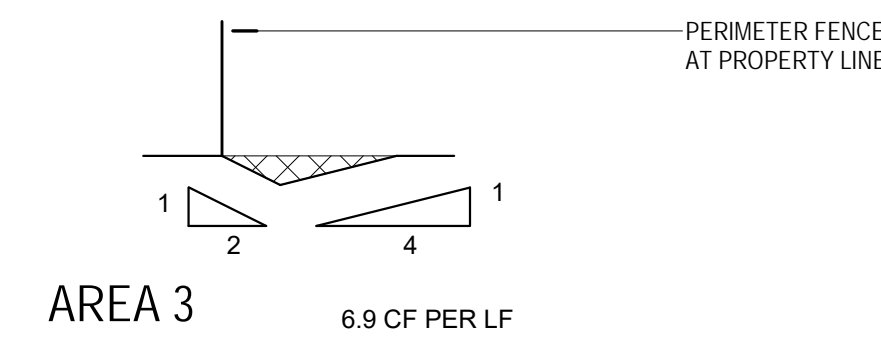
1 PRELIMINARY DEVELOPMENT PLAN (PDP) 1" = 30'-0"



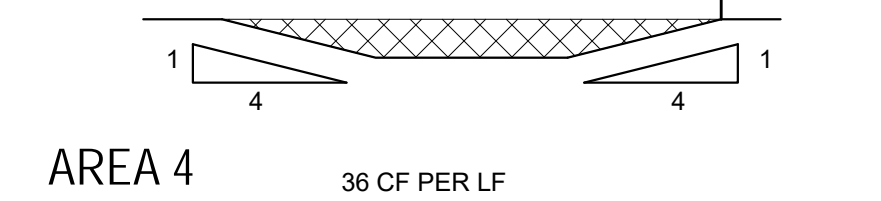
AREA 1 46 CF PER LF



AREA 2 9 CF PER LF



AREA 3 6.9 CF PER LF

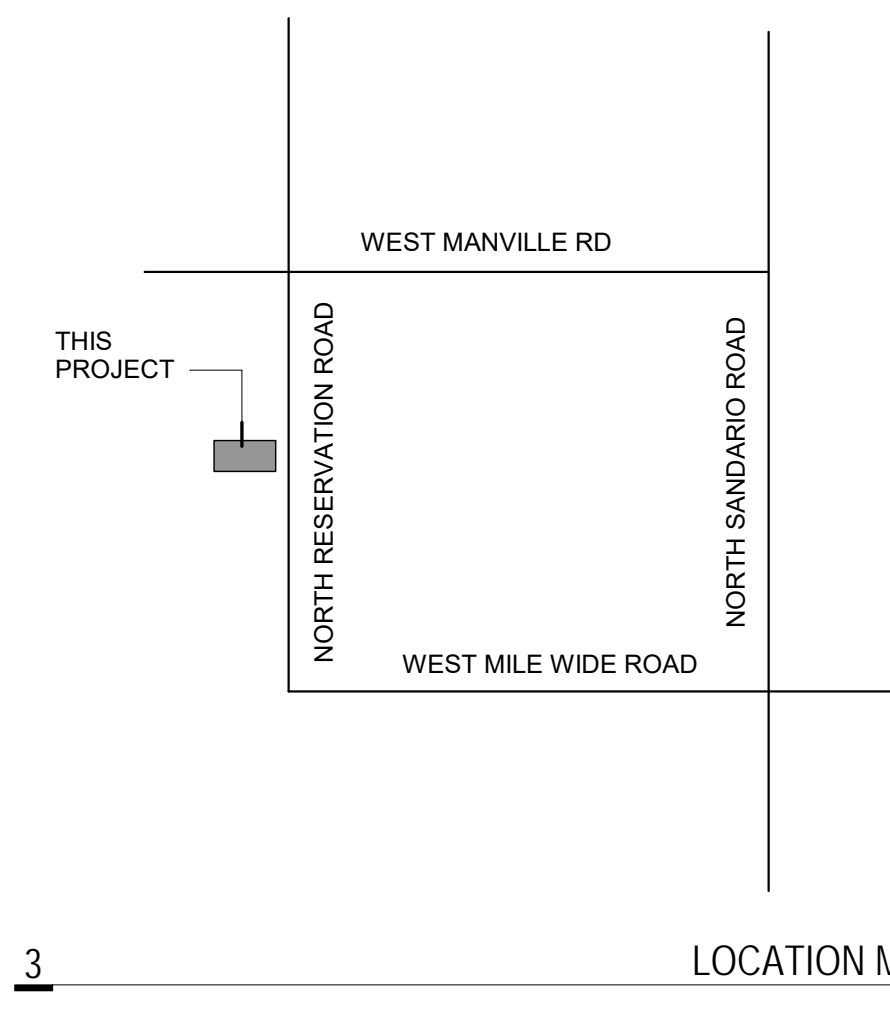


AREA 4 36 CF PER LF

|                            |                    |
|----------------------------|--------------------|
| AREA 1: 46 CF/LF X 485 LF  | = 22,310 CF        |
| AREA 2: 9 CF/LF X 330 LF   | = 2,970 CF         |
| AREA 3: 6.9 CF/LF X 532 LF | = 3,670 CF         |
| AREA 4: 36 CF/LF X 70 LF   | = 2,520 CF         |
| <b>TOTAL</b>               | <b>= 31,470 CF</b> |

**PARKING**

|                                  |           |
|----------------------------------|-----------|
| PHASE 1                          | 1         |
| ACCESSIBLE SPACE VAN (16' x 20') | 9         |
| STANDARD SPACE (8' X 20')        | 10        |
| <b>TOTAL</b>                     | <b>10</b> |



3 LOCATION MAP NTS

**PROJECT NARRATIVE**

4G GROW HOUSE WILL BE A MODERN, AUTOMATED CROP PRODUCTION FACILITY LOCATED ON SEVERAL PROPERTIES IN THE VICINITY 3601 NORTH RESERVATION RD., MARANA, PIMA COUNTY, ARIZONA. THE PROJECT CONSISTS OF ONE OR MORE METAL BUILDINGS PROVIDING APPROXIMATELY 87,000 SF TOTAL BUILDING AREA.

**PARCEL NUMBERS**  
 MAIN PARCEL #208-45-004A  
 WEST PARCEL #208-45-005B

**EXISTING BUILDINGS TO REMAIN**  
 6,700SF

**PHASING:**  
 THE PROJECT WILL POTENTIALLY BE BUILT IN TWO PHASES, EACH WITH METAL BUILDING APPROXIMATELY 43,500 SF.

**POTENTIAL PHASE 1**  
 THIS PHASE WILL BE AN AGRICULTURE CROP PRODUCTION BUILDING, TARGETED AT NEW AUTOMATED VERTICAL FARMING METHODS. THIS METAL BUILDING WILL BE SIMILAR IN NATURE TO ANY OTHER METAL AGRICULTURAL BUILDING. NO MARIJUANA WILL BE GROWN UNTIL THE PHASE 2 SPECIFIC PLAN IS APPROVED. THIS PHASE WILL BE EXEMPT FROM THE PIMA COUNTY ZONING REGULATIONS AS AN AGRICULTURAL BUILDING. WILL INCLUDE:

- THE WEST PORTION OF THE BUILDING.
- NEW WATER TANK FOR DOMESTIC WATER AND FIRE SUPPRESSION, SUPPLIED BY EXISTING WELL.
- NEW SEPTIC SYSTEM FOR BOTH PHASES.
- GRAVEL DRIVE AND PARKING SPACES FOR WEST BUILDING
- PERIMETER FENCE AND SECURITY GATE

**POTENTIAL PHASE 2**  
 WILL INCLUDE:

- THE EAST PORTION OF THE BUILDING
- GRAVEL DRIVE AND PARKING SPACES FOR EAST BUILDING

**ZONING PHASE 1**

**ZONING**  
 CURRENT LOT ZONING: RH

**SURROUNDING PROPERTIES**  
 ZONING: RH  
 USE: VACANT  
 OWNER: CITY OF TUCSON

PHASE 1 IS EXEMPT FROM ZONING REGULATIONS PER PIMA COUNTY ZONING CODE SECTION 18.01.030

THE CONCEPT OF A SINGULAR COMPACTED GRAVEL FIRE ACCESS LANE ON SOUTH AND WEST WITH HAMMERHEAD TURNAROUND HAS BEEN APPROVED BY FIRE CHIEF, AVRA VALLEY FIRE DISTRICT BRIAN DELFS HYPERLINK "MAIL TO: BDELFS@AVAFIRE.ORG" BDELFS@AVAFIRE.ORG

**ZONING AT BUILDOUT**

**ZONING: SPECIFIC PLAN**

**SPECIFIC PLAN DEVELOPMENT STANDARDS**

|                                    |                   |
|------------------------------------|-------------------|
| ITEM                               | 0 SF              |
| MINIMUM SITE AREA                  | 0'-0"             |
| MINIMUM YARD SETBACK               | 34'               |
| MAXIMUM HEIGHT                     | 2'                |
| MAXIMUM STORES                     |                   |
| MINIMUM DISTANCE BETWEEN BUILDINGS | PER BUILDING CODE |
| MAXIMUM SITE COVERAGE              | NONE              |

**USE PER SPECIFIC PLAN**  
 CANNABIS CULTIVATION

**PARKING:**  
 SPECIFIC PLAN ALLOWS REQUIRED PARKING TO OVERLAP SIDEWALK BY 2.5'

**STANDARD PARKING SPACES**  
 1 SPACE PER EMPLOYEE  
 10 EMPLOYEES = 10 SPACES

**ACCESSIBLE SPACES**  
 REQUIRED, 1 PER FIFTY STANDARD SPACES

**BIKE PARKING:**  
 NONE REQUIRED

**LANDSCAPE BUFFERS**  
 NO LANDSCAPE BUFFERS REQUIRED.

PRELIMINARY NOT FOR CONSTRUCTION

**4G FARMS**

3601 NORTH RESERVATION ROAD, MARANA, AZ 85653

**ROB PAULUS ARCHITECTS LTD.**  
 990 EAST 17TH STREET SUITE 100  
 TUCSON ARIZONA 85719 520.624.9805  
 WWW.ROBPAULUS.COM

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**A1**

PRELIMINARY DEVELOPMENT PLAN

# 4G Farms Specific Plan

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## C. Permitted Uses

The primary uses permitted within this Specific Plan are crop production and Cannabis Cultivation. Any Cannabis Cultivation use must take place within a secure, permanent building and may only commence operation once Owner provides the County proof of Dispensary licensing for the off-site Cultivation for the Property. All Permitted Uses within Rural Homestead (“RH”) zone are also permitted.

## D. Development Standards

### 1. Site Development

The following development standards shall govern site development throughout the Specific Plan.

- Minimum Site Area: none
- Maximum Site Coverage: none
- Maximum Building Height: 34 feet/2 stories
- Minimum Building Separation: per building code
- Minimum Perimeter Setbacks: none

### 2. Landscape Standards

The Property is surrounded by agricultural land owned by the City of Tucson. No landscape bufferyards shall be required within this Specific Plan.

Landscaping will be incorporated along the entry drive and the parking areas to provide shade and lessen the heat island effect. Stormwater runoff will be directed to these landscaped areas.

### 3. Vehicular Use Areas & Parking

#### a. Paving

Alternative, porous paving systems will be utilized, where appropriate, and may include

- gravel over compacted base course
- stabilized decomposed granite/crushed rock
- gravel paving
- paver systems for car parking and sidewalk areas

Areas with 10 or more parking spaces shall be paved.

#### b. Curb

Vertical curb is not required to restrict access in parking areas, islands and surrounding depressed landscape areas. At time of development plan submittal, the Project design team will provide an alternative means to discourage vehicular



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traffic in landscape areas with use of bollards, steel pipe wheel stops, post, rip-rap/boulders, or other features.

c. *Vehicular Parking*

- Vehicular parking for the Cannabis Cultivation use shall be provided at a ratio of 1 space per employee. The Project is anticipated to have approximately 10 employees. No other vehicular parking spaces are required.
- Parking space dimensions shall comply with County requirements for a standard space (9 feet x 20 feet). A vehicle may overlap the sidewalk by up to 2.5 feet of the 20-foot depth.

d. *Bicycle Parking*

No bicycle parking is required within this Specific Plan.

4. Loading

No loading zones are required within this Specific Plan.

5. Buffelgrass Elimination

While no buffelgrass was observed on the Property, the Owner shall have a continuing responsibility to remove buffelgrass (*Pennisetum ciliare*) from the Property. Acceptable methods of removal include chemical treatment, physical removal, or other known effective means of removal. This obligation also transfers to any future owners of the Property within the Specific Plan area.

6. Odor Mitigation

Odor mitigation devices and techniques shall be incorporated in all facilities to ensure odors are mitigated to prevent internal odors from being emitted externally. This can be achieved through air filtration system(s) with odor control or any other best practices deemed adequate for odor mitigation as determined by the Zoning Inspector. An odor mitigation plan shall be submitted with building permits for the Property demonstrating compliance with odor control requirements in this section. If a modification is made to the facility on the Property that has the potential to impact the nature or degree of odor, or affects the control of odor, Owner must update its odor mitigation plan within 30 days of facility modification.

## E. Hydrology

The proposed Project is for an agricultural use consisting of a single or multiple buildings, the associated vehicular access and parking and a large landscape area along the north and south boundaries. These landscaped areas will provide retention and stormwater harvesting opportunities for the development. (See *Exhibit II.E: Drainage Concept*.) The plan enhances the existing slow-moving regional stormwater that passes through the site by providing depressed landscaped areas increasing retention with generous vegetation further slowing the migrating flow to aid with the overall infiltration and recharge efforts. Development of



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The proposed development will produce a total runoff of approximately 39.2 cfs in the 100-year flood condition; however, once the stormwater reaches the irrigation canals, this rate is reduced due to the backwater effect (explained in Section IV.C.). Additionally, during a 100-year rainfall event, this amount is negligible as there will be one foot of stormwater flowing through the Property from the regional watercourse floodplain.

# LEGEND

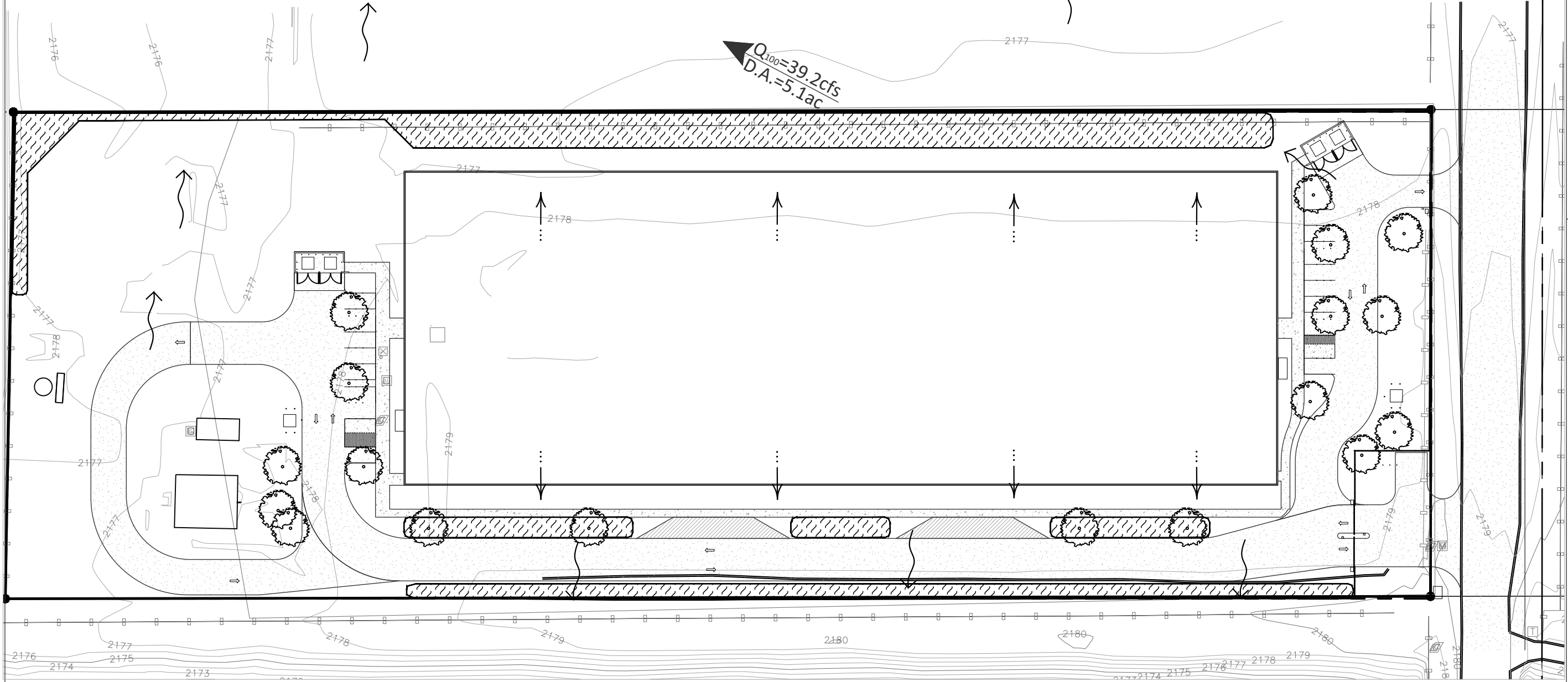
$Q_{100}=1\text{cfs}$   
D.A.=1.0ac → CONCENTRATION POINT

▨ WATER HARVESTING/RETENTION

~→ SHEETFLOW DIRECTION

...→ ROOF/CONCENTRATED FLOW DIRECTION

SCALE 1"=60'  
C.I. = 1 ft



CYPRESS PROJECT NO: 20.206

2030 east speedway boulevard  
suite #110  
tucson, arizona 85719  
ph: 520.499.2456  
cypresscivil.com



EXHIBIT II.E  
DRAINAGE CONCEPT  
for  
BRATTON PROPERTY

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## F. Transportation and Circulation

### 1. Proposed Ingress/Egress and Onsite Vehicular Circulation

Access to the Property will continue to be from N. Reservation Road, which is located adjacent to the Project on City of Tucson-owned property. (NOTE: The City owns parcel 208-45-004C (“City Parcel 004C”) between the built Reservation Road and the Project. The Owner has spoken to City Real Estate about this condition and the City is comfortable with access as proposed.) 4G Farms will dedicate parcel 208-45-004B, which is between City Parcel 004C and Reservation Road, to the County at time of development package. Reservation Road from Mile Wide Road to Manville Road is unpaved and maintained by the County. Mile Wide Road is unpaved from Reservation Road to ½ mile east of Reservation Road and is also maintained by the County.

There will be approximately 10 employees, who will generate approximately 20 trips per day (10 in, 10 out). Because this is not a dispensary site, and production delivery is regulated by the State, no customers will access the Project. Per Arizona Dept. of Health Services, the product may only be transported via an unmarked armored vehicle, which is expected to be no more frequent than once every two weeks. There will be two ways to arrive at the Property (one via Mile Wide Road to the south and the other via Manville Road to the north), and assuming the trips are distributed equally to these roads, there will be 10 new vehicle trips per day on the Reservation Road segment north of the Project, and 10 new vehicle trips per day on the Reservation Road segment south of the Project. The cost of constructing all-weather access roadway segments on Reservation Road for 10 vehicles per day per segment is not commensurate with the impact the vehicles would have on the roadway, regardless of the current Average Daily Traffic (“ADT”).

4G Farms will apply for a Subdivision and Development Street Standards (“SDSS”) modification to deviate from the SDSS requirement for all commercial development to provide legal, paved, all-weather access to the public roadway.

Parking areas may be provided at one or both ends of the Property and a gravel (or other pervious material) driveway linking the east parking area with the west parking area (and caretaker’s residence) will be located along the southern Property boundary. Parking areas with 10 or more spaces shall be paved.

### 2. Average Daily Traffic & Concurrency

The use on the Property will continue to be agriculture/crop production. Any increase in traffic on N. Reservation Road and its connectors will be de minimis. As indicated in Section II.F.1, the ADTs for the Project area roadways will increase by 10-20 ADT (i.e., approximately 10 new vehicle trips per day on the Reservation Road segment north of the Project and approximately 10 new vehicle trips per day on the Reservation Road segment south of the Project). The current and future levels of service on these roadways will be LOS A based on the existing and projected volumes.





# 4G Farms Specific Plan

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Given the minor increases in ADT attributable to the Project, there are no concerns regarding concurrency.

## 3. Distances to Existing Drives/Intersections

Distances from the Property to existing driveways and intersections are shown in *Exhibit II.F: Distances to Existing Driveways/Intersections* and are listed below.

- There is an access to an unpaved road/trail on the east side of Reservation Road that is offset from the existing access to the Property by 40 feet to the south.
- Access to the Tucson International ModelPlex Park is ½ mile south of the Project access.
- Access to the Cocoraque Ranch is 0.7 miles south of the Project access. (This access location is generally along the Fort Lowell Road alignment to the east.)
- Manville Road is 1.5 miles north of the Project access.
- Mile Wide Road is 1.5 miles south of the Project access.

## 4. Bicycle & Pedestrian Circulation

The Property is in a rural area, accessed by unpaved roads with no sidewalks or bicycle paths. Because no employees of the Project are expected to bike or walk to work, no offsite bicycle or pedestrian improvements are proposed.

Sidewalks will be installed onsite from the parking areas to the building to meet ADA requirements.

## 5. Traffic Impact Study

The County's SDSS Section 3.1 provides criteria for when a Traffic Impact Study ("TIS") or a Traffic Memorandum ("TM") would be required. These criteria are generally based on the projected trip generation of a project, the crash history of the project area roadways, or other criteria. Based on the requirements found in this section of the SDSS, this Project would not require the preparation of either a TIS or a TM.

## G. Utility Infrastructure

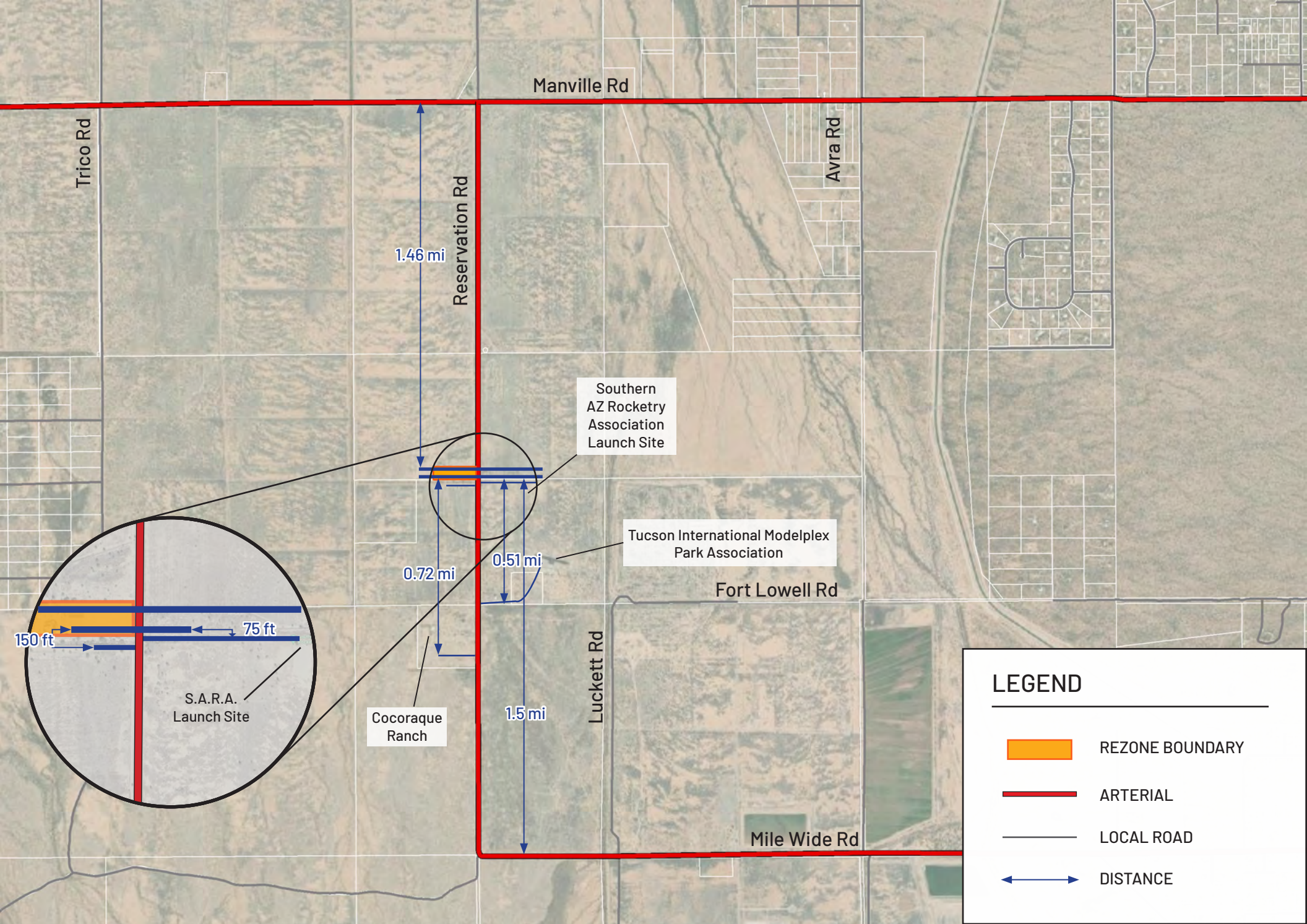
### 1. Sewer

There are no sewer systems within miles of the Project area. The Property has historically been serviced by an onsite septic system and the proposed development will include a new septic system to handle all sewage flows.

### 2. Water

There are no public water systems within miles of the Project area. The Property has historically been serviced by an onsite water well and the proposed development will continue to utilize the existing well but will also have onsite water tanks and a booster pump for the required fire protection.





**Exhibit II.F: Distances to Existing Driveways/Intersections**

# 4G Farms Specific Plan

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## III. IMPLEMENTATION AND ADMINISTRATION

### A. Administration and Interpretation

The 4G Farms Specific Plan shall be administered by the Pima County Planning Official, and all implementation decisions shall be based on the purpose of the Specific Plan. If a conflict arises between the Specific Plan and the PCZC, the Specific Plan shall control. If the Specific Plan is silent on any issue, and the PCZC is consulted, the purpose and intent of the Specific Plan shall control the Planning Official's decision whether and how to apply the PCZC. Appeals of any Planning Official interpretation of this Specific Plan may be made to the Board of Supervisors within 30 days of the date of the interpretation. A fee in accordance with adopted Pima County Development Services Department Fee schedule for an "Appeal of an Interpretation" and an "Advertised Public Hearing" must accompany any such appeal. The Specific Plan will not result in the modification or change of any existing County-adopted building codes.

### B. Phasing and Procedures for Development Review

This Project is intended to be built in two phases. Phase 1, which will begin prior to approval of the Specific Plan, includes the construction of a new 43,500 square-foot crop production facility and other site improvements, as described in Subsection II.A. of the Specific Plan. Although Phase 1 improvements fall under the PCZC exemption pertaining to agricultural uses,<sup>1</sup> a development package showing both building and site improvements will be submitted to the County for a courtesy review. The purpose of this review is to ensure the plans comply with applicable County regulations when the use on the Property transitions from agricultural uses to Cannabis Cultivation.

A development package for Phase 2, which will include the construction of a second (attached) 43,500 square-foot metal crop building, will be submitted after the Specific Plan is approved and will reflect all Phase 1 improvements. All improvements will be in conformance with the Specific Plan and conditions of approval. (See Section V.) Detailed traffic and hydrology reports will be submitted with the development package, if required.

The Owner serves as the Master Association and Property Manager for the Specific Plan. Through a self-certification process, the Owner shall review and approve all development packages/Project design features, signage applications, and architectural/building plans proposed for the Property prior to County submittal.

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<sup>1</sup> PCZC § 18.01.030.C.2.b: Statutory exemption on land used for general agricultural purposes when fifty percent or more of the owner's income from said land is derived from the production of agricultural products.



# 4G Farms Specific Plan

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## C. Amendments

### 1. Minor

The County Planning Official may administratively approve minor (or insubstantial) changes, as defined below, to the Specific Plan, provided such changes are in conformance with the overall intent, goals and objectives of the Specific Plan as presented herein.

The following shall be considered minor changes that fall within the administrative purview of the Planning Official:

- Addition of new information to the Specific Plan, maps or text otherwise in compliance with the below standards.
- Changes to the public or private infrastructure as presented herein as necessary to properly serve the Specific Plan.
- Addition of permitted uses that may not be specifically listed in Section II.C of this Specific Plan, but which are determined to be sufficiently similar in type and nature to those listed as permitted.
- Adjustments to the Development Standards in Section II.D of this document that are not harmful to the interests of the larger community or adjacent properties, or which are not explicitly stated in the Specific Plan, but which are consistent with the guiding goals and objectives of the Project and do not create any public health or safety issues.
- Adjustments to any aspect of Section II of this Specific Plan that is required to comply with changes in local, state or federal safety and/or health codes.

### 2. Major

Major (or substantial) amendments to the Specific Plan shall be those changes or modifications that materially alter the guiding goals and objectives as presented in the Specific Plan. Major amendments to the Specific Plan shall be processed in accordance with Section 18.90.080 of the PCZC.

# 4G Farms Specific Plan

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## IV. SITE INVENTORY

### A. Land Use

#### 1. Location/Regional Context

The Property is in unincorporated Pima County, west of the City of Tucson and southwest of the Town of Marana and surrounded by publicly-owned vacant land and agricultural uses. The Property is situated east of the Ironwood Forest National Monument, west of Saguaro National Park West and north of the Tohono O’odham Nation. See *Exhibit I.A: Regional Location Map*.

Access to the Property is from N. Reservation Road, which intersects with W. Manville Road approximately 1.5 miles to the north and with W. Mile Wide Road approximately 1.5 miles to the south.

#### 2. Existing Land Uses

Existing land uses are identified on *Exhibit IV.A: Existing Land Uses & Zoning*.

##### a. Onsite Land Uses

Current onsite land uses include agricultural uses with a greenhouse nursery, accessory storage buildings and a caretaker’s residence.

##### b. Offsite Land Uses

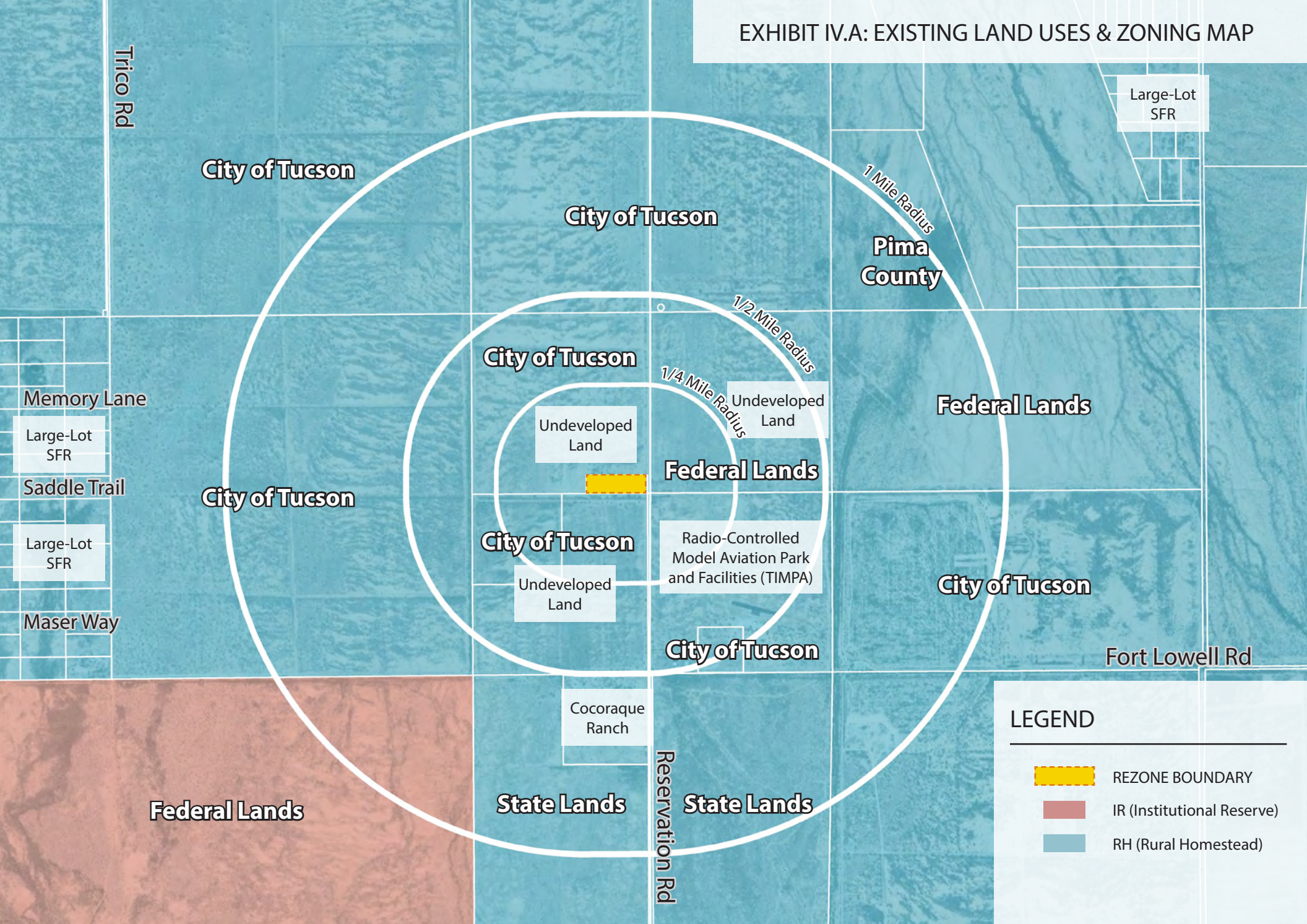
The Property is entirely surrounded by publicly-owned vacant land and agricultural uses. Corcoraque Ranch & Pavillion, a cattle ranch with a commercial roping arena and event center is located approximately ½ mile south of the Property.

#### 3. Existing Zoning




As indicated on *Exhibit IV.A*, the Property and nearly all surrounding properties within 1 mile are zoned RH. The exception is a portion of the Ironwood Forest National Monument, which is located southwest of the Property and is zoned Institutional Reserve (“IR”).



EXHIBIT IV.A: EXISTING LAND USES & ZONING MAP



**LEGEND**

-  REZONE BOUNDARY
-  IR (Institutional Reserve)
-  RH (Rural Homestead)



# 4G Farms Specific Plan

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## 4. Existing Easements

The only easement associated with the property is a 20' gas line easement centered on an existing gas line that runs parallel to the south boundary of the property. The exact location of this easement is unknown as the existing gas line was not marked at the time of the survey. The proposed development will not have any adverse impact on this easement.

## 5. Comprehensive Plan

The Property is located within Avra Valley, Planning Area 1, of *Pima Prospers*. The County's CLS identifies this Property as "Agricultural In-Holdings", which are "areas where active, or abandoned, agriculture lands exist within the Conservation Lands System." Per *Pima Prospers*,

The Property currently includes (and will continue to include) agricultural land uses in compliance with *Pima Prospers* and the CLS.

## B. Topography & Grading

### 1. Topographic Characteristics

Historically being farmland, the Property's topography is relatively flat. The general slope is gentle and slopes downward from southeast to northwest with only three feet of fall across the Property. The east two-thirds of the Property is the flattest with slightly more relief occurring on the west one-third.

See *Exhibit IV.B: Existing Topography*.

### 2. Average Cross Slope

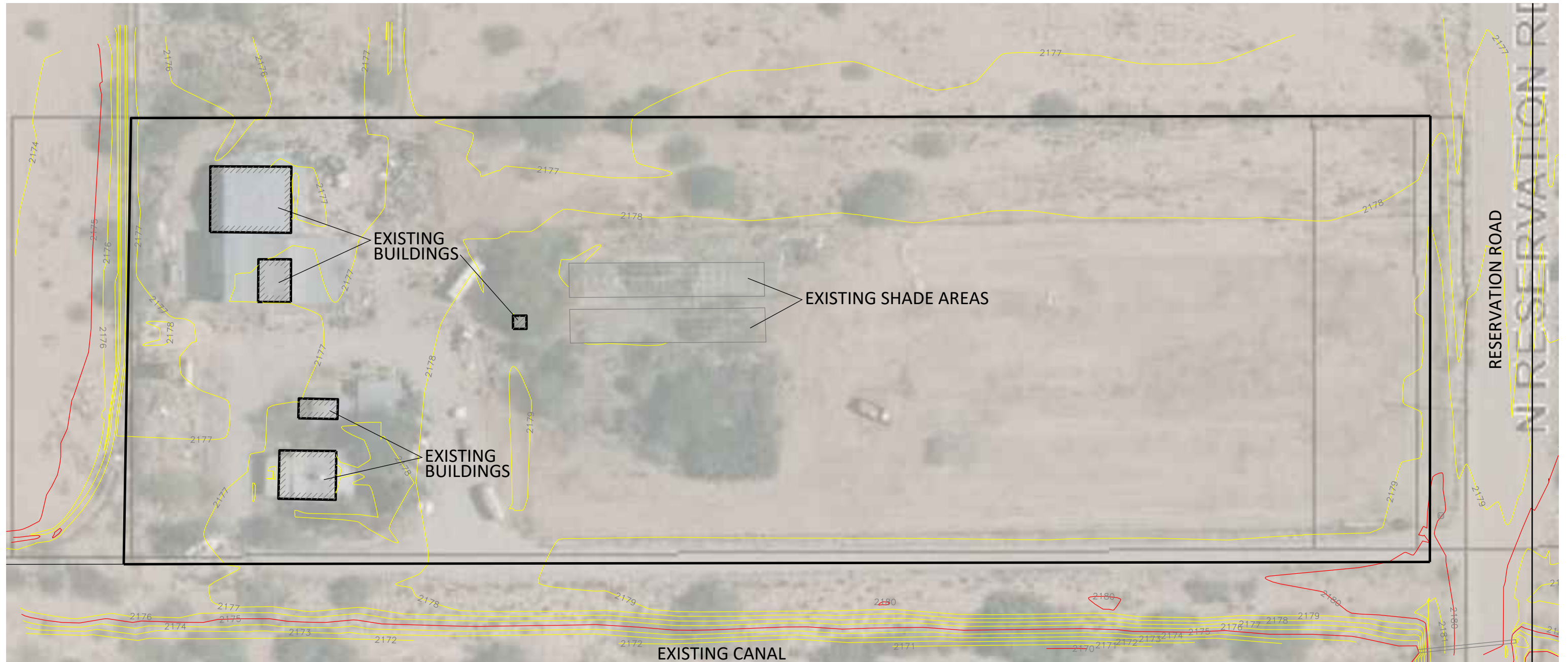
$$\text{ACS} = \frac{I \times L \times 0.0023}{\text{Acres}}$$

Interval (I) = 1 feet  
Total length of contours (L) = 3713  
Area (A) = 5.07

$$\text{ACS} = \frac{1 \times 3713 \times 0.0023}{5.07 \text{ acres}} = 1.68 \%$$

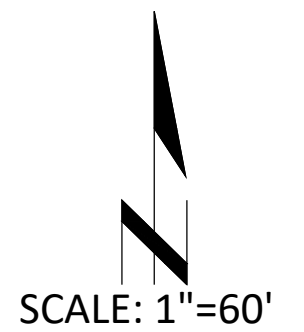


EXHIBIT IV.B: EXISTING TOPOGRAPHY



LEGEND

- MAJOR CONTOUR (5' INTERVAL)
- MINOR CONTOUR (1' INTERVAL)
- EXISTING BUILDING OUTLINE





# 4G Farms Specific Plan

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## C. Hydrology

### 1. Offsite Watersheds

The Property is situated within the Brawley Wash floodplain, which constitutes the only offsite watershed affecting the property. The Brawley Wash floodplain conveys up to 21,000 cfs during a 100-year storm event and is greater than 2.5 miles wide at this location. Flow through the Property is from the south/southeast to the north/northwest. Vegetation is limited to the agriculture growing season with mature vegetation limited to roadsides and adjacent to irrigation canals.

### 2. Onsite Hydrology

The Property is approximately 5.1 acres in size and is surrounded by agricultural fields that are relatively flat with slopes generally less than 1%. Approximately 55% of the Property has been used to grow crops. There are multiple structures making the Property 7% impervious. Soils within the Project area are classified by the United States Soil Conservation Service (“SCS”) as 85% “A” & 15% “B”. The Property is located in an undesignated basin.

The onsite drainage was analyzed as a single watershed since all runoff is shallow sheet-flow that exits the Property along the northern boundary. The Property has the potential to generate up to 16.3 cfs during a 100-year storm return interval. Irrigation canals along the western boundary and offsite to the north are elevated, thus creating an impoundment of flood waters with a backwater effect that reduces velocities such that onsite and offsite flow resembles a slow-moving pond. When stormwater reaches a depth that exceeds the raised perimeter boundary, stormwater flows as shallow sheet flow to the north onto the neighboring agricultural fields and ultimately into the Brawley Wash floodway approximately 3 miles downstream (to the north) of the Property.

See *Exhibit IV.C.2: Existing Conditions Hydrology*.

### 3. Existing Drainage Conditions & Infrastructure

#### a. *Features that affect site*

There are irrigation canals along the western boundary and north of the Property that impound stormwater in larger volume rainfall events, contributing to the widespread detention of the area, as well as, holding stormwater back as retention after the flooding subsides.

#### b. *Q100 and acres upstream offsite*

The Brawley wash has an estimated flow of 21,000 cfs during a 100-year event. The Brawley wash fringe is a broad, widespread floodplain of slow-moving floodwaters with depths estimated at 1’ during a 100-year event. This area, by virtue of its extremely flat topography riddled with canals and roadside ditches throughout, is a unique landscape where the potential for recharge is ideal.



# 4G Farms Specific Plan

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c. *Methodology for EHS*

The Property is within the Brawley Wash overbank floodplain but is outside of the 250-foot Erosion Hazard Setback (“EHS”) measured from the main watercourse and outside of the 100-foot EHS of the West Branch of the Brawley Wash. The EHS is established for Brawley Wash and mandated by Pima County Regional Flood Control District.

d. *Methodology for Q (>100cfs)*

Onsite peak discharge rates were calculated using Pima County Regional Flood Control Districts PC-Hydro Methodology that only applies to the arid southwest taking into account slope, vegetation cover and impervious surfaces. The peak flow rate is proportional to the rainfall depth average over the time of concentration. Infiltration is a function of the soil group types (A, B, C, and D) with watersheds less-than one square mile.

#### 4. Floodplain

According to the Federal Emergency Management Agency Flood Insurance Rate Map Panel No. 04019C1620L, dated June 16, 2011, the Property is located in an AO Flood Zone with a depth of one foot. Any structures within this zone shall have the finished floor elevation (“FFE”) constructed 2.0 feet above the highest adjacent grade.





SCALE 1"=100'  
C.I. = 1 ft

LEGEND

- $\frac{Q_{100} =}{D.A. = 1.0 \text{ AC}}$  CONCENTRATION POINT
- SHEET FLOW DIRECTION
- PROJECT AREA

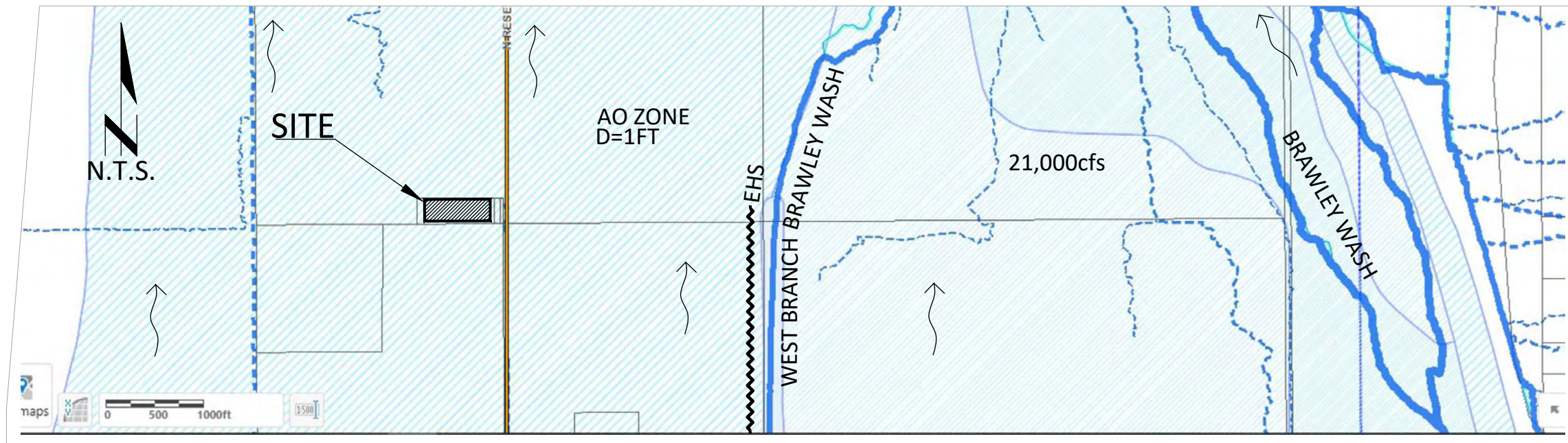


EXHIBIT IV.C.2:  
EXISTING CONDITIONS  
HYDROLOGY  
for BRATTON PROPERTY

CYPRESS PROJECT NO: 20.206



2030 east speedway boulevard  
suite #110  
tucson, arizona 85719  
ph: 520.499.2456  
cypresscivil.com

# 4G Farms Specific Plan

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## D. Biological Resources

### 1. Conservation Lands System

The County's Conservation Lands System ("CLS") identifies this Property as "Agricultural In-Holdings", which are "areas where active, or abandoned, agriculture lands exist within the Conservation Lands System." (See Exhibit IV.D: Biological Map.)

The Property will continue to have active agricultural land uses with this Project.

### 2. Priority Conservation Area

#### a. *Pima Pineapple Cactus*

The Property is not within Priority Conservation Area ("PCA") for the Pima Pineapple Cactus.

#### b. *Needle-Spined Pineapple Cactus*

The Property is not within PCA for the Needle-Spined Pineapple Cactus.

#### c. *Cactus Ferruginous Pygmy Owl & Burrowing Owl*

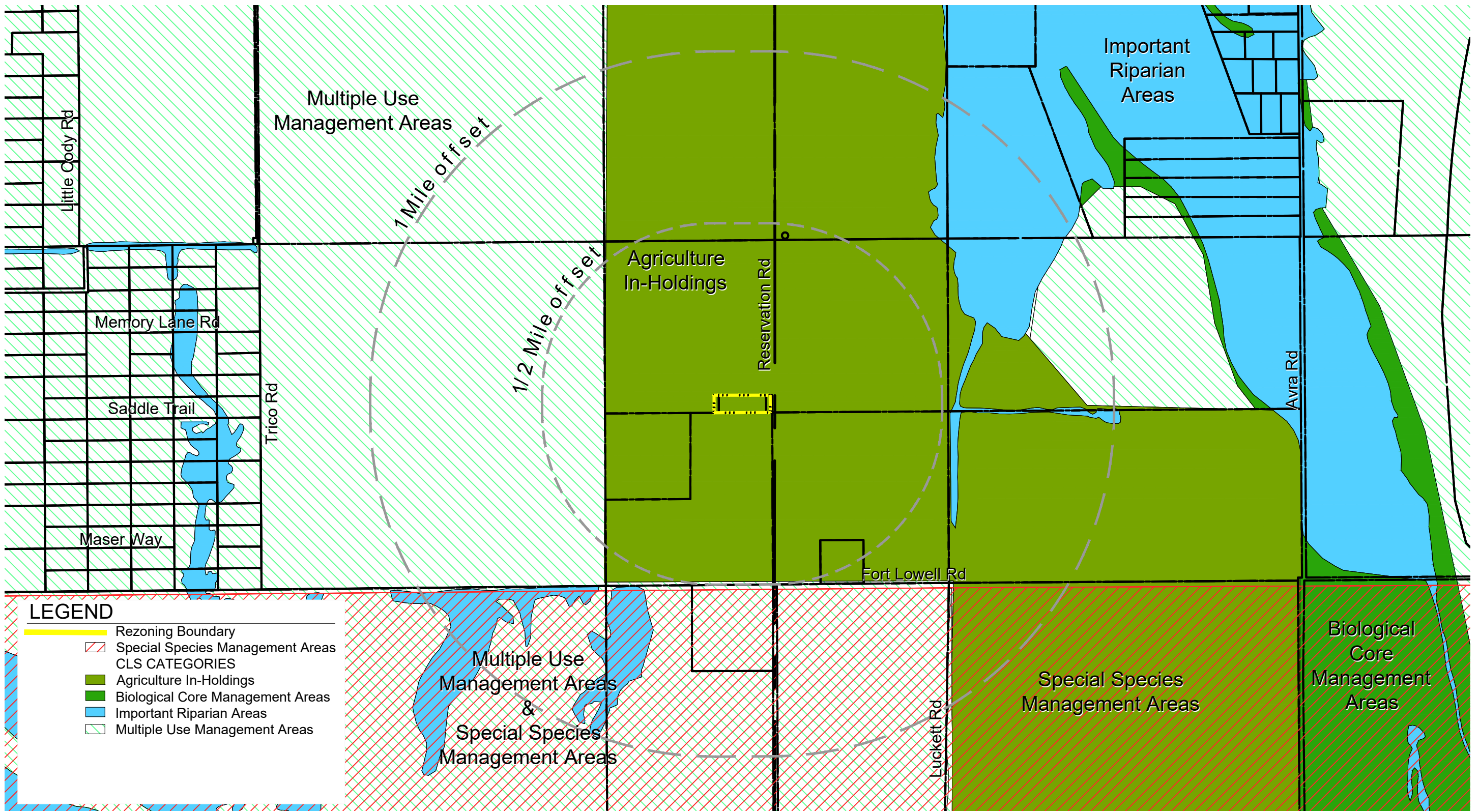
The Property is within PCA for both the Cactus Ferruginous Pygmy Owl and the Burrowing Owl. Surveys have not been conducted for either species on this Property.

#### d. *Saguaros & Ironwood Trees*

No saguaros or ironwood trees exist on this Property.

### 3. Habitat Protection/Community Open Space

There have been no discussions between the Property owner and the County regarding potential acquisition of the Property.



# 4G Farms Specific Plan

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## E. Transportation

### 1. Existing/Planned Offsite Streets

#### a. Roadway Inventory

The Property is in a rural area, and access to the Property is via a series of unpaved roadways. There are no designated Scenic or Gateway Routes in the Project vicinity.

Direct access to the Property is on N. Reservation Road, located on City of Tucson-owned property. (NOTE: The City owns parcel 208-45-004C between the built Reservation Road and the Project. The Owner has spoken to City Real Estate about this condition and the City is comfortable with access as proposed.) N. Reservation Road is classified as a Rural Minor Collector on Arizona Department of Transportation's ("ADOT") Federal Functional Classification System map. It is unpaved with an existing 90-foot right-of-way and a posted speed limit of 35 mph.

W. Manville Road is classified as a Rural Minor Collector on ADOT's Federal Functional Classification System map. It is paved and has an existing 90-foot rights-of-way and a speed limit of 50 mph. The segment of W. Mile Wide Road intersecting with N. Reservation Road is classified as a Rural Major Collector on ADOT's Federal Functional System map. It is unpaved from Reservation Road to ½ mile east of Reservation Road and has a speed limit of 45 mph.

The Pima Association of Governments' website has ADT volumes for the three roadways in the Project area. All volumes are show as year 2021 volumes:

- Reservation Road, Manville Road to Mile Wide Road: 126 ADT
- Mile Wide Road, east of Reservation Road: 55 ADT
- Manville Road, west of Reservation Road: 1,047 ADT
- Manville Road, east of Reservation Road: 1,266 ADT

W. Fort Lowell Road intersects with N. Lockett Road approximately ½ mile southeast of the Property. Both are classified as Local Minor Roadways and are unpaved. Neither roadway is classified on ADOT's Federal Functional Classification System map.

*Exhibit IV.E.1.a: Existing Transportation Network* shows the roadway system within one mile of the Property.

#### b. Planned Improvements

The FAST Act formally designated I-11 as a proposed transportation route in Arizona. This route includes a section from Tucson to Phoenix. The recommended corridor alignment is within about 2,000 feet of the property. (See *Exhibit IV.E.1.b: Proposed I-11 Alignment*.) The timing for construction of the I-11 corridor is unknown. If and when it is constructed, circulation patterns



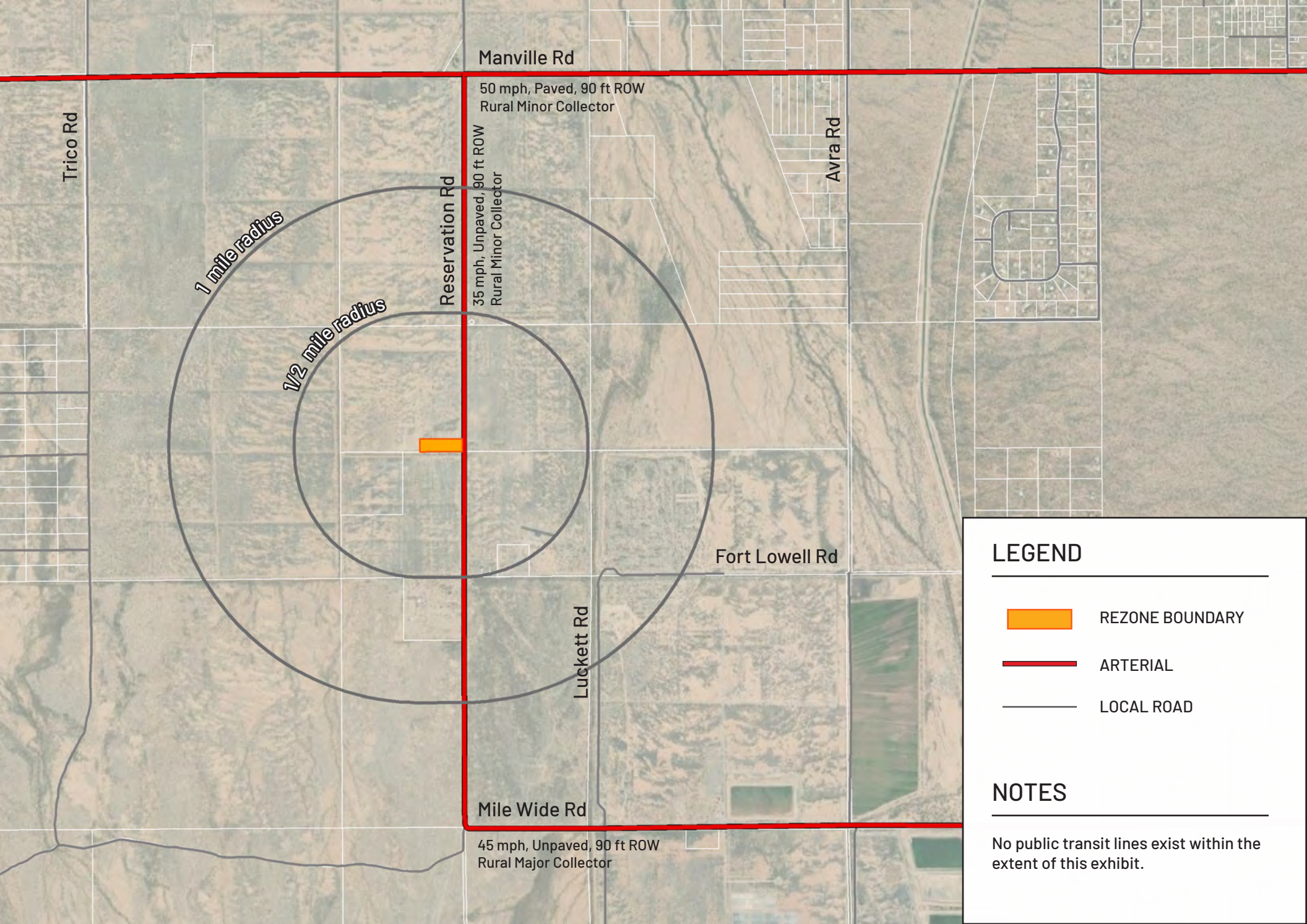
# 4G Farms Specific Plan

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may change in the Project vicinity may be impacted. More information on that plan can be found at <http://origin.i11study.com/index.asp>.

## 2. Public Transit & Alternate Modes

There are no public transit facilities, bus stops or bus routes serving the Property or surrounding area. There are no sidewalks or bicycle routes in the Project vicinity.



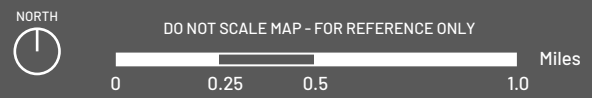
### LEGEND

- REZONE BOUNDARY
- ARTERIAL
- LOCAL ROAD

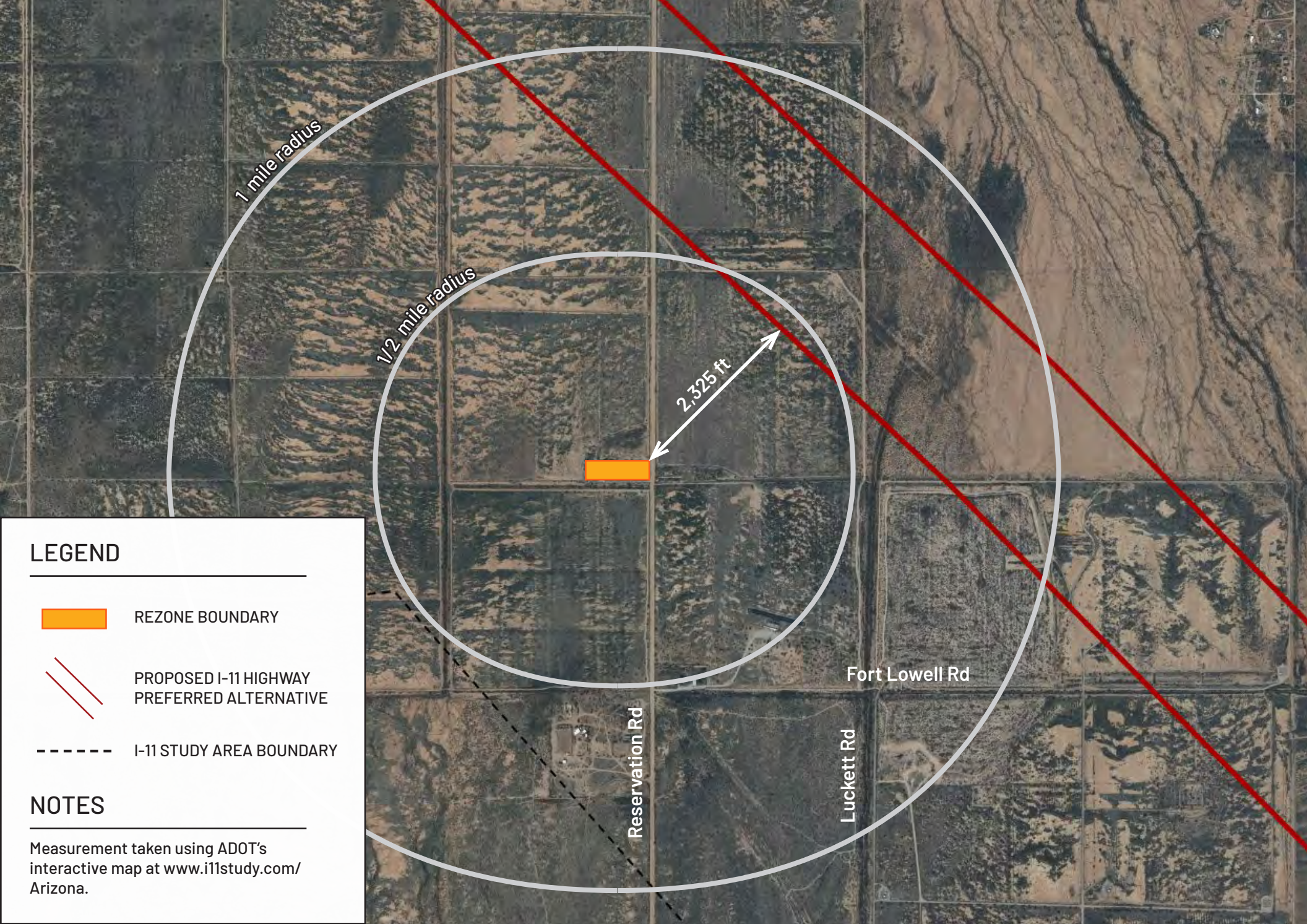
### NOTES

No public transit lines exist within the extent of this exhibit.




**Exhibit IV.E.1.a: Existing Transportation Network**







**LEGEND**

-  REZONE BOUNDARY
-  PROPOSED I-11 HIGHWAY PREFERRED ALTERNATIVE
-  I-11 STUDY AREA BOUNDARY

**NOTES**

Measurement taken using ADOT's interactive map at [www.i11study.com/Arizona](http://www.i11study.com/Arizona).

**Exhibit IV.E.1.b: Proposed I-11 Alignment**



DO NOT SCALE MAP - FOR REFERENCE ONLY



Miles



# 4G Farms Specific Plan

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## F. Utilities

### 1. Sewer

There are no sewer systems within miles of the Project area. The Property has historically been serviced by an onsite septic system. There are no records available for the existing septic system, so it is unclear exactly where it is located onsite but it is assumed to be in the west one-third of the area. The existing septic system will be removed/abandoned as part of the new development.

### 2. Water

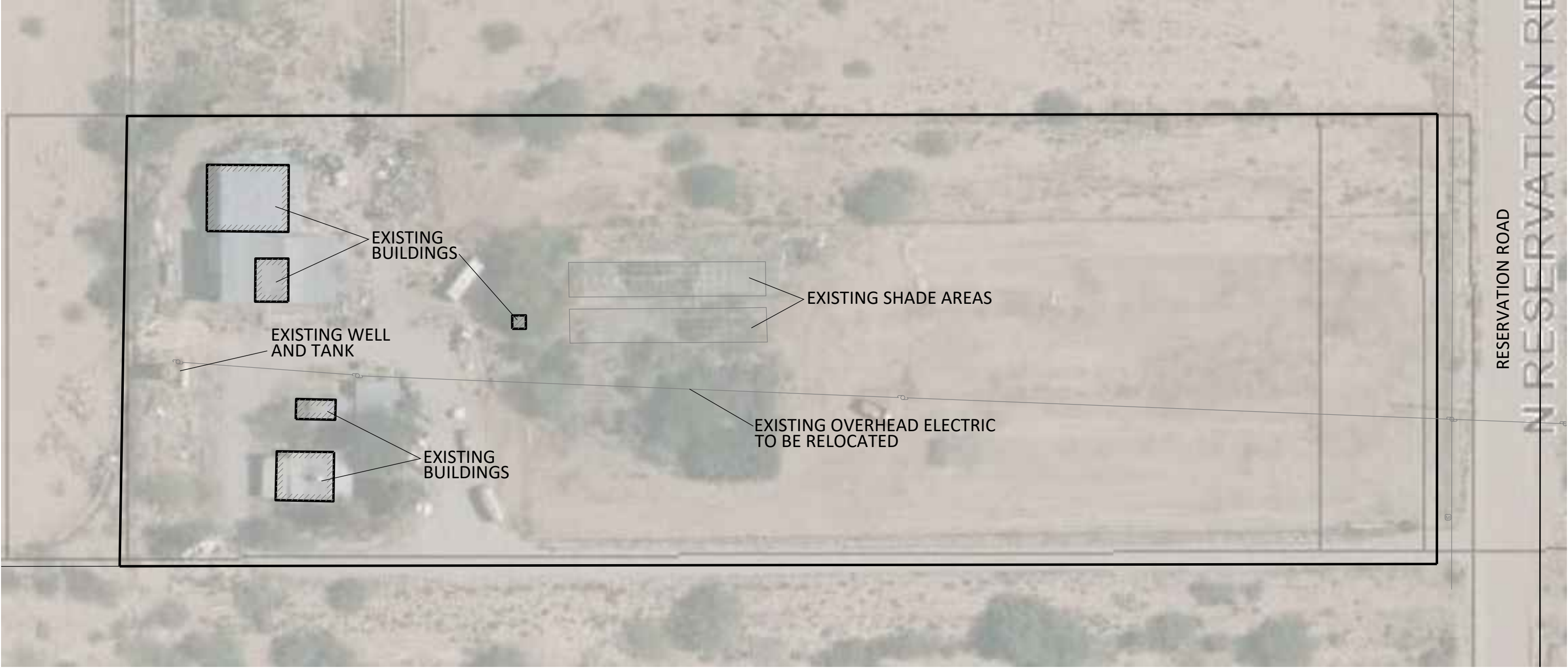
There are no public water systems within miles of the Project area. The Property has historically been serviced by an onsite water well and tank. (See *Exhibit IV.F: Existing Utilities*.) The proposed development will continue to utilize the existing well but will also have onsite water tanks for the required fire protection.

## G. Recreation

There are no parks, trails or other recreation facilities within one mile of the Property.



# EXHIBIT IV.F: EXISTING UTILITIES



# 4G Farms Specific Plan

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## H. Cultural Resources

Correspondence from the Arizona State Museum is included as *Exhibit IV.H*.

## I. Composite

A Composite Map is provided as *Exhibit IV.I*. This map indicates the Property's existing physical constraints, including structures, topography, riparian habitat, utilities and easements.



THE UNIVERSITY OF ARIZONA

## ARIZONA STATE MUSEUM

Arizona State Museum

PO Box 210026

Tucson AZ 85721-0026

(520) 621-6281

[www.statemuseum.arizona.edu](http://www.statemuseum.arizona.edu)

March 16, 2021

Robin Large  
Lazarus & Silvyn, P.C.  
5983 E. Grant Rd, Ste. 290  
Tucson, AZ 85712

**RE:** 4<sup>th</sup> Generation Farms Specific Plan  
Parcels 208-45-004A, 208-45-004B, 208-45-004C, 208-45-005B

Dear Robin,

Arizona State Museum (ASM) has reviewed archaeological project and site records in support of project: 4<sup>th</sup> Generation Farms Specific Plan. Correspondence indicates this project will involve the rezoning of approximately 5.5 acres of privately-owned land with the intent of cultivating marijuana. The project area is located within Pima County, Arizona and encompasses parcels 208-45-004A, 208-45-004B, 208-45-004C, and 208-45-005B within Township 13 South, Range 10 East, Section 25. Below are the results of ASM's research.

### **Search Results:**

According to a search of the archaeological site files and records retained at ASM, eight archaeological survey projects were conducted within a one-mile radius of the project area between 1996 and 2006. Previous survey work was conducted in support of rebuilding overhead power lines; construction of recharge basins; development; installation of underground and aerial cable; gas lines; and construction of electric substations, transmission lines, and an access road. No previous survey has been conducted within a one-mile radius of the project area.

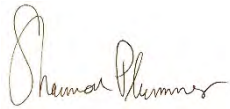
Two archaeological sites have been identified within a one-mile radius of the project area, neither of which are within the current project area.

### **Recommendations and Responsibilities:**

1. Because the project area has not been previously surveyed, ASM recommends, but it is not required by ASM, that a qualified archaeological contractor be consulted before any ground-disturbance begins. A list of archaeological contractors is available on the ASM website at: <https://statemuseum.arizona.edu/crm>
2. Pursuant to Arizona Revised Statute §41-865, if any human remains or funerary objects are discovered during project work, all work will stop within the area of the remains and ASM's Repatriation Office will be contacted at 520-626-2950.
3. City, county, or municipal governments may have requirements; therefore, ASM recommends that the relevant jurisdiction(s) be consulted.

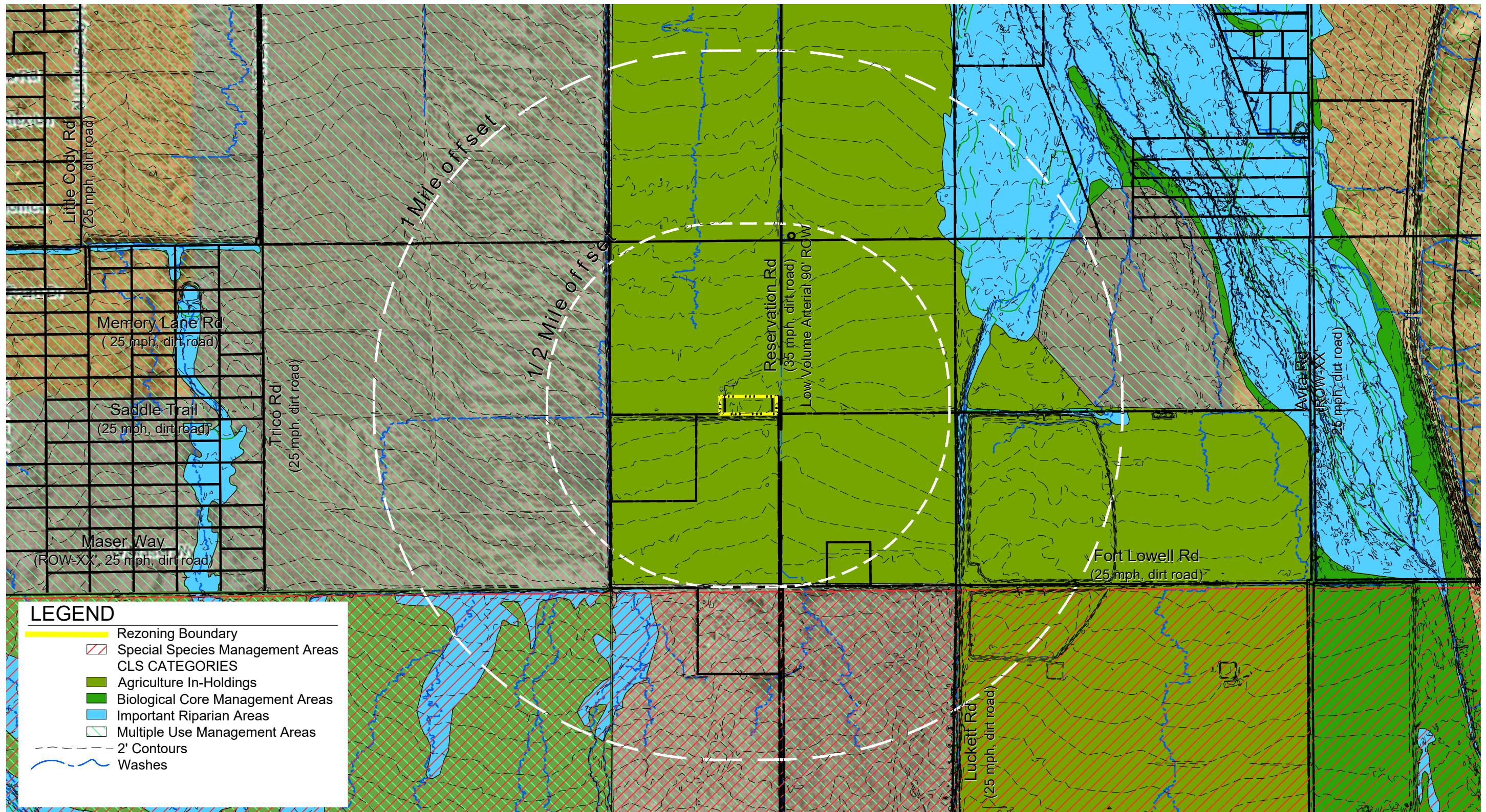
If you have any questions about the results of this records search, please feel free to contact me  
twilling@email.arizona.edu or 520-621-4795.

Sincerely,

A handwritten signature in cursive script, appearing to read "Shannon Plummer".

Shannon Plummer, M.A., R.P.A. (formerly Shannon Twilling)  
Arizona State Museum  
Arizona Antiquities Act Administrator

# EXHIBIT IV.I: COMPOSITE MAP



# 4G Farms Specific Plan

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## V. CONDITIONS OF APPROVAL

A. Purpose

B. Board of Supervisors Conditions of Approval





# 4G Farms Specific Plan

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## VI. REFERENCES

Pima County. "*PimaMaps.*" Pima County, Arizona, <http://gis.pima.gov/pimamaps/>.

Pima County. "*Pima Prospers.*" Pima County, Arizona, adopted May 19, 2015.

Pima County. "*Title 18 – Zoning.*" Pima County, Arizona, Municipal Code, [http://library.amlegal.com/nxt/gateway.dll/Arizona/pimacounty\\_az/title18zoning?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:pimacounty\\_az](http://library.amlegal.com/nxt/gateway.dll/Arizona/pimacounty_az/title18zoning?f=templates$fn=default.htm$3.0$vid=amlegal:pimacounty_az).

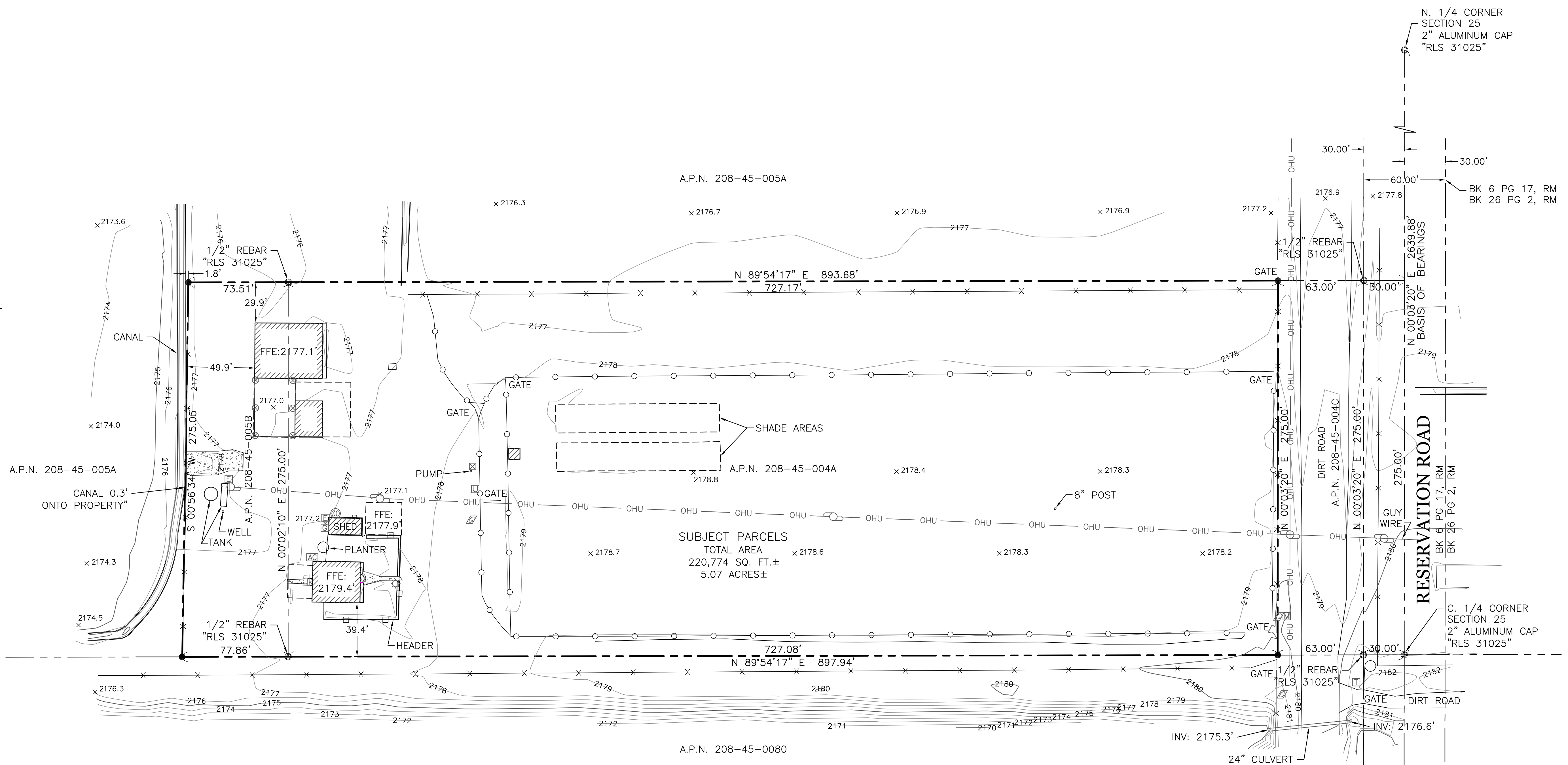


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# Appendix A

Boundary & Topographic Survey

**SCALE:**  
1"=40'



**LEGEND**

|   |                                   |         |                               |
|---|-----------------------------------|---------|-------------------------------|
| ● | SET 1/2" REBAR TAGGED "RLS 41603" | □       | TELEPHONE PEDESTAL            |
| ○ | FOUND MONUMENT AS NOTED           | □       | UTILITY UNKNOWN               |
| ○ | UTILITY POLE (SEE NOTE 3)         | □       | MAIL BOX                      |
| □ | ELECTRIC METER                    | ⊗       | 10" POST                      |
| ⊗ | ELECTRIC CONTROL BOX              | ---     | PROPERTY LINE                 |
| ⊙ | LIGHT POLE                        | — OHU — | OVERHEAD UTILITY (SEE NOTE 4) |
| □ | A/C UNIT                          | — □ —   | CHAIN LINK FENCE              |
| ⊙ | SEWER CLEANOUT                    | — x —   | BARBED WIRE FENCE             |
| □ | GAS METER                         | — ○ —   | PIPE FENCE                    |
| ⊙ | GAS MARKER                        | ▒       | CONCRETE                      |
|   |                                   | ▒       | BUILDING                      |

**NOTES**

- THIS IS NOT AN ALTA/NSPS MAP. THIS MAP AND THE SURVEY IT REPRESENTS IS PURSUANT TO STUART TITLE AND TRUST OF TUCSON, PRELIMINARY MEMORANDUM REPORT, FILE NO. 1073162, DATED DECEMBER 29, 2020. NO EASEMENTS WERE FOUND TO PLOT OTHER THAN ITEM 7, SEE NOTE BELOW.
  - ITEM 7: GAS LINE EASEMENT, DOCKET 1942 AT PAGE 543  
THIS 20.00' EASEMENT IS CENTERED ON AN EXISTING GAS LINE. THERE WERE NO GAS BLUESTAKE MARKINGS AT THE TIME OF SURVEY. THE LOCATION OF THIS EASEMENT IS UNKNOWN AND NOT SHOWN.
- THE SURVEYOR HAS COMPLETED NO ADDITIONAL INDEPENDENT RESEARCH FOR EASEMENTS OR RESTRICTION AFFECTING THE SUBJECT PARCEL BEYOND THOSE LISTED ON THE SCHEDULE B OF SAID PRELIMINARY MEMORANDUM REPORT.
- THE UTILITY LOCATIONS SHOWN ON THIS MAP ARE FROM FOUND BLUESTAKE MARKINGS, AND ACTUAL LOCATIONS OF UTILITY APPURTENANCES. ALTHOUGH EVERY EFFORT WAS MADE BY THE SURVEYOR TO LOCATE AND SHOW ALL UTILITIES AFFECTING THE SUBJECT PARCEL, NO GUARANTEE CAN BE MADE REGARDING THE EXISTENCE OF HIDDEN OR UNDOCUMENTED UTILITIES.
- THE UTILITY SYMBOLS SHOWN ON THIS MAP ARE A GRAPHIC REPRESENTATION AND MAY NOT REPRESENT THE ACTUAL SIZE OF THE UTILITY APPURTENANCE BEING SHOWN.
- THE UTILITY POLE SYMBOL ON THIS MAP IS A GRAPHIC REPRESENTATION OF THE LOCATION OF A UTILITY POLE. THE UTILITY POLES SHOWN ON THIS MAP WERE LOCATED AT GROUND LEVEL. THE SURVEYOR HAS MADE NO ATTEMPT TO PORTRAY THE SIZE, USE, AND PLUMBNESS OF EACH POLE.
- THE "OHU" LINE SHOWN ON THIS DRAWING, IS A REPRESENTATION OF AN OVERHEAD UTILITY LINE OR LINES. NO ATTEMPT HAS BEEN MADE BY THE SURVEYOR TO REPRESENT THE USE, PURPOSE, NUMBER OF LINES, HEIGHT ABOVE GROUND, AND DISTANCE TO THE NEAREST PROPERTY LINES FROM THE LINES SHOWN.
- THE SURVEYOR HAS MADE NO INVESTIGATION OR INDEPENDENT RESEARCH FOR EASEMENTS OF RECORD, ENCUMBRANCES, RESTRICTIVE COVENANTS, OWNERSHIP TITLE EVIDENCE, OR ANY OTHER FACTS THAT A CURRENT TITLE SEARCH MAY DISCLOSE.
- ALL DIMENSIONS SHOWN ON THIS MAP ARE MEASURED OR A CALCULATED DERIVATIVE THEREOF UNLESS STATED OTHERWISE.

**CERTIFICATION OF SURVEY**

THIS IS TO CERTIFY THAT THIS SURVEY WAS PERFORMED UNDER MY DIRECTION DURING THE MONTH OF DECEMBER, 2020 AND THAT ALL MONUMENTS EXIST AS SHOWN.



JOHN DAVID REYES  
REGISTERED LAND SURVEYOR  
ARIZONA REGISTRATION No. 41603

**BASIS OF BEARINGS**

THE BASIS OF BEARINGS FOR THIS SURVEY IS THE EAST LINE OF THE N.W. 1/4 OF SECTION 25, T. 13 S., R. 10 E., G.&S.R.M., PIMA COUNTY, ARIZONA, AS SHOWN ON THAT SURVEY RECORDED IN BOOK 45 PAGE 49, SURVEYS, RECORDS OF PIMA COUNTY, AZ. THE BEARING OF SAID LINE IS N.00°03'20"E.

**BASIS OF ELEVATIONS**

THE BASIS OF ELEVATIONS FOR THIS SURVEY IS PIMA COUNTY DEPARTMENT OF TRANSPORTATION "OPUS" CONTROL POINT "13S10E\_N23", DESCRIBED AS A CHISELED "+" AT THE NW CORNER OF A RAISED CONCRETE PAD. THE ELEVATION OF SAID BENCHMARK IS 2,146.91', NAVD 88 DATUM.

|           |     |            |          |
|-----------|-----|------------|----------|
| SURVEY:   | JCR | DATE:      | 12/04/20 |
| CAD:      | JDR | DATE:      | 12/23/20 |
| CHECKED:  | JDR | REV. DATE: | 1/26/21  |
| REVISION: |     | REV. DATE: |          |

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**BOUNDARY AND TOPOGRAPHIC SURVEY**  
A PORTION OF THE NORTHWEST 1/4 OF  
SECTION 25, T.13 S., R.10 E., G. & S.R.M., PIMA COUNTY, ARIZONA