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MARION COUNTY PUBLIC WORKS

MEMORANDUM

TO: Marion County Hearings Officer

FROM: Marion County Planning Division/Speckman

DATE: November 10, 2026

SUBJECT: Zone Change/Comprehensive Plan Change/Property Line Adjustment 26-003

The Marion County Planning Division has reviewed the above-referenced application and offers the following comments.

FACTS:

1. The proposal involves two properties; 13495 Woodburn-Monitor Rd NE (051W27A000600) site of the Yspenia Church built in 2012 and 13340 Wilco Hwy NE (051W27A000100) a farm parcel with a homesite built in 1977.

   The Yspenia Church (tax lot 600) is the subject property of the proposed zone change and comprehensive plan change, and subsequently a property line adjustment to expand by 1.8 acres. The property is a 1.56-acre Commercial zoned parcel designated Commercial in the Marion County Comprehensive Plan. The property contains a parking lot and three structures built in 2012 for the purpose of this religious organization. In 2011 Yspenia Church applied for a Variance (V11-004) to reduce the side yard setback for these structures from 30-feet to 5-feet. Having previously been the subject of an approved land use case, this parcel is legal for land use purposes.

   The second subject property (tax lot 100) is not part of the proposed zone change and comprehensive plan change, but is proposed to adjust property lines with the primary subject parcel in order to transfer approximately 1.8 acres of land to the church property. This second subject parcel is located at 13340 Wilco Hwy NE (tax lot 100) and is a 31.44-acre parcel in use for a home site and agricultural purposes. The parcel is zoned Exclusive Farm Use (EFU) and designated Primary Agriculture in the Marion County Comprehensive Plan. The home was built in 1977. Approximately 23.25 acres are used for grass seed production, and 3.75 acres were previously used for berry production. The proposed area to be transferred is 1.8 acres of the previous berry field. This property was created in its current configuration by Property Line Adjustment in 2005 (PLA05-040) and is therefore legal for land use purposes.

2. The properties are located on the north side of Woodburn-Monitor Rd NE, where it crosses Bonney Rd NE and quickly meets Highway 214. There are no streams, floodplains, wetlands or geo-hazards mapped on the subject properties.

3. Surrounding properties to the north, west, and east are zoned EFU and in various types of farm use. Properties to the south in the approximately 6-acre island between Woodburn-Monitor Rd NE and Highway 214 are zoned Industrial and Commercial. To the south of this industrial and commercial area is a parcel in the EFU zone owned by Portland General Electric and in use for a substation. The rest of the lands south of the subject parcels are zoned EFU and in use for agriculture.

4. The applicant is requesting to change the Comprehensive Plan designation from Commercial to Primary Agriculture and change the zoning from C (Commercial) to EFU (Exclusive Farm Use) on a 1.56-acre parcel that contains a church, and subsequently adjust the property lines with the adjacent EFU zoned parcel to transfer 1.8 acres to the church for the purpose of expanding a parking lot. The proposed final configuration would be two EFU zoned parcels, the 31.44-acre parcel becoming a 28.09-acre parcel with the homesite and farmland and the 1.56-acre parcel becoming a 3.35-acre parcel with the church and space for parking lot expansion.

5. Various departments and agencies were contacted with a request for comment.

   Public Works Land Development and Engineering Permits commented:
   "MCPW Engineering has no immediate requirements for the Zone Change or Property Line Adjustment. However, the below Requirements pertain to the intended parking expansion.

   ENGINEERING REQUIREMENTS

   A. An Access Permit will be required to establish a new connection to Woodburn-Monitor Road to serve the proposed parking expansion [MCC 11.10].

   B. Additional stormwater detention may be required at 0.5-acre of added surfacing. A stormwater plan by Pacific Northwest Engineering was approved in 2011 for the existing development that may be relevant to any additional required stormwater improvements [MCC 17.110.833]."

   Marion County Building Department commented: "No Building Inspection concerns. It is recommended new property lines be established at least 3 feet from any existing residential structures and/or at least 10 feet from any existing commercial structures."

   Marion County Surveyor's Office commented:
   -Properties 10 acres or less must be surveyed per ORS 92.060 (7) and the survey submitted for review.
   -Survey checking fee required at the time of review.
   -Property line adjustment deed(s) shall be recorded with the Marion County Clerk's Office. Per ORS 92.190 (4).

   Marion County Tax Assessor provided tax related information which is available in the case file.

   At the time of this staff report all other contacted agencies either failed to respond or stated no objection to the proposal.

STAFF FINDINGS AND ANALYSIS:

6. In land use actions of this type, the applicant has the burden of proving compliance with all applicable criteria. This report will outline the criteria that must be satisfied in order for approval to be granted. If the applicant supplied argument or evidence to address specific criteria, the response will be summarized.

STATEWIDE PLANNING GOALS

7. The MCCP plan amendments section states that comprehensive plan amendments must be consistent with statewide planning goals.

Goal 1: Citizen Involvement. To develop a citizen involvement program that insures the opportunity for citizens to be involved in all phases of the planning process.

The notice and hearings process before the hearings officer and Board of Commissioners (BOC) provides opportunity for citizen involvement. Goal 1 is satisfied.

Goal 2: Land Use Planning. To establish a land use planning process and policy framework as a basis for all decisions and actions related to use of land and to assure an adequate factual basis for such decisions and actions.

Applicant proposes a site-specific comprehensive plan amendment. The Planning Division notified local and state agencies, including the Oregon Department of Land Conservation and Development (DLCD), for comments. Goal 2 is satisfied.

Goal 3: Agricultural Lands. To preserve and maintain agricultural lands.

The applicant proposes to re-designate and rezone the primary subject parcel (tax lot 600) to a farm zone. Tax lot 600 was originally zoned Commercial as a part of exception area 9.1 Nortons Corner. The Nortons Corner exception area is focused on the island of land bordered by Hwy 214 to the west, Bonney Rd NE, and Woodburn-Monitor Rd NE to the north. These public rights-of-way also act as buffers between these Commercial and Industrial zoned parcels, and the surrounding EFU zoned lands in agricultural use. Of this exception area, only the 1.56-acre subject parcel extends beyond this right-of-way buffered island on land surrounded by incongruous zones and uses. The proposed zone change reduces this exception area to the buffered island. The proposed expansion of the church parking lot increases the buffer provided by Woodburn-Monitor Rd NE between potential future industrial uses on the Industrial zoned parcel to the south, and agricultural uses to the north.

Staff considered Oregon Administrative Rules (OAR) 660-033-020(1) and 660-033-030 for the definition and identifying rules for agricultural land.

660-033-0020
Definitions

For purposes of this division, the definitions in ORS 197.015, the Statewide Planning Goals, and OAR chapter 660 shall apply, unless the context requires otherwise. In addition, the following definitions shall apply:
(1)(a) "Agricultural Land" as defined in Goal 3 includes:
(A) Lands classified by the U.S. Natural Resources Conservation Service (NRCS) as predominantly Class I-IV soils in Western Oregon and I-VI soils in Eastern Oregon;
(B) Land in other soil classes that is suitable for farm use as defined in ORS 215.203(2)(a), taking into consideration soil fertility; suitability for grazing; climatic conditions; existing and future availability of water for farm irrigation purposes; existing land use patterns; technological and energy inputs required; and accepted farming practices; and
(C) Land that is necessary to permit farm practices to be undertaken on adjacent or nearby agricultural lands.
(b) Land in capability classes other than I-IV/I-VI that is adjacent to or intermingled with lands in capability classes I-IV/I-VI within a farm unit, shall be inventoried as agricultural lands even though this land may not be cropped or grazed;
(c) "Agricultural Land" does not include land within acknowledged urban growth boundaries or land within acknowledged exception areas for Goal 3 or 4.

The soil on the subject parcel tax lot 600 proposed for the zone change and comprehensive plan change is 100% Woodburn silt loam (0 to 3 % slopes) which is a class 2 high value soil, consistent with OAR 660-033-0020(1)(a)(A). The parcel is both adjacent to, and intermingled with other lands consisting of high value soils and designated for farm use, consistent with OAR 60-033-0020(1)(b). The parcel is within a specifically acknowledged exception area for Goal 3, an exception which was taken at the time that Marion County's comprehensive plan was first acknowledged by DLCD as compliant with Senate Bill 100. Though tax lot 600 was designated for Commercial use, eventually developed with a church. Existing religious organizations are permitted within the EFU zone subject to standards. MCC 17.136.040(C)(2)(a) states that existing religious organizations may be maintained, enhanced or expanded on the same tract wholly within a farm zone. The land is not currently in active agricultural use, however the existing development and use on the parcel is consistent with uses on agricultural land. The proposed zone change significantly limits future development options on the subject parcel to only those uses permitted in the EFU zone, uses in harmony with agricultural uses.

660-033-0030
Identifying Agricultural Land
(1) All land defined as "agricultural land" in OAR 660-033-0020(1) shall be inventoried as agricultural land.
(2) When a jurisdiction determines the predominant soil capability classification of a lot or parcel it need only look to the land within the lot or parcel being inventoried. However, whether land is "suitable for farm use" requires an inquiry into factors beyond the mere identification of scientific soil classifications. The factors are listed in the definition of agricultural land set forth at OAR 660-033-0020(1)(a)(B). This inquiry requires the consideration of conditions existing outside the lot or parcel being inventoried. Even if a lot or parcel is not predominantly Class I-IV soils or suitable for farm use, Goal 3 nonetheless defines as agricultural "Lands in other classes which are necessary to permit farm practices to be undertaken on adjacent or nearby lands." A determination that a lot or parcel is not agricultural land requires findings supported by substantial evidence that addresses each of the factors set forth in 660-033-0020(1).

(3) Goal 3 attaches no significance to the ownership of a lot or parcel when determining whether it is agricultural land. Nearby or adjacent land, regardless of ownership, shall be examined to the extent that a lot or parcel is either "suitable for farm use" or "necessary to permit farm practices to be undertaken on adjacent or nearby lands" outside the lot or parcel.

The subject parcel that has been developed with a use permitted on agricultural land and meets the definition of agricultural land consistent with OAR 660-033-0020(1)(A-C). Therefore, the subject parcel shall be inventoried as agricultural land consistent with OAR 660-033-0030.

Staff finds that the proposed zone change and comprehensive plan change is consistent with intention of Goal 3 to preserve and maintain agricultural lands. Goal 3 is satisfied.

Goal 4: Forest Lands. To conserve forest lands by maintaining the forest land base and to protect the state's forest economy by making possible economically efficient forest practices that assure the continuous growing and harvesting of forest tree species as the leading use on forest land consistent with sound management of soil, air, water, and fish and wildlife resources and to provide for recreational opportunities and agriculture.

The subject property is not inventoried, designated or zoned as forest land. Goal 4 is not applicable.

Goal 5: Open Spaces, Scenic and Historic Areas, and Natural Resources. To protect natural resources and conserve scenic and historic areas and open spaces.

There are no scenic, historic, or natural resources identified in the MCCP on the subject or nearby properties. Goal 5 is satisfied.

Goal 6: Air, Water and Land Resources Quality. To maintain and improve the quality of the air, water and land resources of the state.

Primary agriculture designation and zoning will allow continuation of the existing religious organization, and severely limit other potential uses which are currently outright permitted under the Commercial designation and zoning. In-place regulations will maintain the level of air, water and land resources. Goal 6 is satisfied.

Goal 7: Areas Subject to Natural Disasters and Hazards. To protect people and property from natural hazards.

The property contains no identified hazards. Goal 7 is satisfied.

Goal 8: Recreational Needs. To satisfy the recreational needs of the citizens of the state and visitors and, where appropriate, to provide for the siting of necessary recreational facilities including destination resorts.

No Goal 8 resources are identified on the subject site or implicated by this application. This goal is not applicable.

Goal 9: Economic Development. To provide adequate opportunities throughout the state for a variety of economic activities vital to the health, welfare, and prosperity of Oregon's citizens.

Goal 9 addresses commercial and industrial development, primarily in urban areas. OAR Chapter 660, Division 009 applies only to comprehensive plans for areas within urban growth boundaries. Goal 9 is not applicable.

Goal 10: Housing. To provide for the housing needs of citizens of this state.

OAR 660-008 is intended to define standards for compliance with Goal 10. OAR 660-008 deals with providing an adequate number of needed housing units, and efficient use of buildable land within urban growth boundaries. The subject property is not within an urban growth boundary. Goal 10 does not apply.

Goal 11: Public Facilities and Services. To plan and develop a timely, orderly and efficient arrangement of public facilities and services to serve as a framework for urban and rural development.

Electric and telephone utilities are available in the area. No public water and sewer services will be required. Goal 11 is satisfied.

Goal 12: Transportation. To provide and encourage a safe, convenient and economic transportation system.

The proposal is motivated by periodic parking shortages during religious holidays as the congregation has grown. This shortage has led to church members having to park nearby and walk along busy roadways. The zone change and property line adjustment to enlarge the parking lot will make more safe and convenient the traffic related to the church. No expansion of the church building is proposed and therefore the amount of traffic will not increase, rather the parcels ability to property serve existing traffic will increase. LDEP commented on this application with future requirements for an access permit and stormwater detention. LDEP expressed no concern about the plan and zone amendment significantly affecting the existing transportation facility by permitting levels of development that would be inconsistent with roads serving the property. Goal 12 is satisfied.

Goal 13: Energy Conservation. To conserve energy.

The proposal is ultimately to accommodate more onsite parking for an existing religious organization. The proposal does not involve an expansion of the structure that accommodates the religious services, and therefore energy usage on site will not increase. Goal 13 is satisfied.

Goal 14: Urbanization. To provide for an orderly and efficient transition from rural to urban land use, to accommodate urban population and urban employment inside urban growth boundaries, to ensure efficient use of land, and to provide for livable communities.

Changing the MCCP designation to Primary Agriculture and zoning to EFU will not urbanize the subject property. Goal 14 does not apply.

Goals 15-19, Willamette River Greenway, Estuarine Resources, Coastal Shorelands, Beaches and Dunes, and Ocean Resources.

The subject site is not within the Willamette River Greenway, or near ocean or coastal related resources. These goals do not apply.

COMPREHENSIVE PLAN AMENDMENT

8. The MCCP does not contain specific review criteria for plan amendments; however, any amendment must be consistent with its applicable goals and policies. The policies that need to be addressed by applicant include:

AGRICULTURAL LANDS POLICIES

1. Preserve lands designated as Primary Agriculture by zoning them EFU (Exclusive Farm Use). Lands designated as Special Agriculture should be protected by the corresponding SA zone and farmland in the Farm/Timber designation should be protected by the Farm/Timber zone.

The proposed comprehensive plan change from Commercial to Primary Agriculture would be simultaneously matched by a zone change from Commercial to EFU. The proposal is consistent with this policy.

2. Maintain primary agricultural lands in the largest areas with large tract to encourage larger scale commercial agricultural production.

The area around the subject parcels has a mix of large tracts in agricultural use, smaller parcels dedicated to homesites, and parcels zoned and in use for Commercial and Industrial operations. The proposal is consistent with this policy.

3. Discourage development of non-farm uses on high-value farmland and ensure that if such uses are allowed that they do no cause adverse impacts on farm uses.

The proposal is for the expansion of a parking lot for an existing religious organization on high-value soils which were zoned Commercial. This is an existing use which currently is underserved by the parking lot on the Commercial zone parcel. The expansion of the parking lot will remove 1.8 acres from potential agricultural use to serve the church. The current Commercial zoning outright permits intensive uses which could arguably cause adverse impacts on adjacent farm use. The zone change to EFU sacrifices those potential uses in order to continue the existing church use. The impacts are addressed in more detail in the zone change criteria and based on available information staff has determined that no adverse impacts on surrounding farm uses will result from the development of more parking for the existing church. The proposal is consistent with this policy.

4. Limit residential uses on high-value lands to those dwellings where past income from the sale of farm products demonstrate that the dwelling will be in conjunction with the farm use. Non-farm dwellings should be limited to existing parcels where the dwelling will be compatible with the surrounding farm area. The approval of non-farm residences shall be based upon findings that the proposed dwelling meets the applicable criteria in OAR 660-033. Approval of a dwelling in the Farm/Timber designation shall be based on the applicable criteria in OAR 660-033 or 660-006.

No new dwelling is proposed. This policy does not apply to the proposal.

5. Divisions of agricultural lands shall be reviewed by the County and comply with the applicable minimum parcel size and the criteria for the intended use of the property.

No division of land is proposed. This policy does not apply to the proposal.

6. Farmland should be taxed at agricultural use value.

This policy does not apply to the proposed zone change and comprehensive plan change. After the property line adjustment, farmland shall remain eligible for taxation at agricultural use values if it is continued to be farmed. The proposal is consistent with this policy.

7. Additional housing allowed on farmlands shall be necessary for farm management purposes. These dwellings should be manufactured homes so they can be removed when not needed, or be occupied by a relative of the farm operator and sited on the same parcel as the principal dwelling. A deed restriction shall be recorded requiring removal of the dwelling when the occupancy or use no longer complies with the criteria or standards under which the dwelling was originally approved.

This policy does not apply to the proposal.

8. The location of new dwellings must comply with density limitations intended to protect major and peripheral big game habitat.

This policy does not apply to the proposal.

9. When creation of a non-farm parcel is warranted, the size of the parcel shall be as small as possible to preserve the maximum amount of farmland in the farm parcel. Requirements may need to be imposed when non-farm parcels are allowed in farm use areas to minimize the potential for conflicts with accepted farm management practices on nearby land. These may include special setbacks, deed restrictions and vegetative screening.

This policy refers to creation of a new parcel by way of partition. The parcel which is proposed to be changed from Commercial designation and zone to Primary Agriculture designation and EFU zone is already an existing parcel. The proposed property line adjustment, following the proposed comprehensive plan change and zone change, is the minimum area required to expand the parking lot in such a way that the church can continue to operate without disrupting neighboring parcels or creating traffic hazards. The proposal is consistent with this policy.

ZONE CHANGE

9. The criteria for a zone change are found in the Marion County Code Chapter 17.123.060:

A. The proposed zone is appropriate for the Comprehensive Plan land use designation on the property and is consistent with the goals and policies of the Comprehensive Plan and the description and policies for the applicable land use classification in the Comprehensive Plan; and

The proposed zone will no longer be consistent with the comprehensive plan designation of Commercial, and therefore a comprehensive plan change from Commercial to Primary Agriculture is also proposed. As addressed in the previous section, the proposed comprehensive plan designation is appropriate for the subject parcel, in harmony with surrounding uses, and consistent with the applicable goals and policies of the comprehensive plan. The criterion is met.

B. The proposed change is appropriate considering the surrounding land uses and the density and pattern of development in the area; and

The zone will be consistent with the adjacent farm uses to the north and west. To the east and south the property is buffered by public rights-of-way for Bonney Rd NE and Woodburn-Monitor Rd NE. On the other side of Bonney, to the west, is land in agricultural use for a hazelnut orchard. On the other side of Woodburn-Monitor Rd NE, to the south, is land zoned commercial and in commercial use, as a well as land zoned Industrial and currently vacant. The subject parcel contains a religious organization, which is consistent with the rural Commercial zone and less intensive than permitted uses in the Industrial zone. Existing religious organizations may be maintained, enhanced or expanded on EFU zoned land, consistent with MCC 17.136.040(C)(2)(a). The existing use will continue to be conforming with the proposed change, and is an appropriate transitional use between the Commercial and Industrial zoned land to the south, and the Agricultural land to the north. The criterion is met.

C. Adequate public facilities, services, and transportation networks are in place, or are planned to be provided concurrently with the development of the property; and

The parcel is served by the Monitor Fire District, Marion County Sheriff's Office, has a public road providing access and will be served by a well and septic system. The criterion is met.

D. The other lands in the county already designated for the proposed use are either unavailable or not as well suited for the anticipated uses due to location, size or other factors; and

The proposed use is already established. The existing location is well suited, and appropriate for the established use in either the current or proposed zone. The zone and comprehensive plan change would permit the proposed Property Line Adjustment to occur which will allow the expansion of a parking lot to solve a parking shortage with the existing parking lot. The applicant explains that the religious organization serves members in the rural area, and there is a shortage of available lands in the rural area in which to establish a church. The criterion is met.

E. If the proposed zone allows uses more intensive than uses in other zones appropriate for the land use designation, the new zone will not allow uses that would significantly adversely affect allowed uses on adjacent properties zoned for less intensive uses.

The new zone does not allow uses that are more intensive. On the contrary, the proposed zone significantly restricts potential uses on the subject parcel. The proposed zone is for

the purpose of being able to perform a Property Line Adjustment that will allow the continuation of the established religious organization use. This will better align the zoning with the present and future use of the parcel. The criterion is met.

10. Staff recommends approval of the Zone Change and Comprehensive Plan Change.

11. The applicant proposes a property line adjustment between the 1.56-acre parcel at 13495 Woodburn-Monitor Rd NE and the 31.44-acre parcel at 13340 Wilco Hwy NE to create a 3.35-acre parcel and a 28.09-acre parcel.

MCC 17.136.090(C) Property Line Adjustments.

1. *When one or more lots or parcels subject to a proposed property line adjustment are larger than the minimum parcel size pursuant to subsection (A)(1) of this section, the same number of lots or parcels shall be as large or larger than the minimum parcel size after the adjustment. When all lots or parcels subject to the proposed adjustment are as large or larger than the minimum parcel size, no lot or parcel shall be reduced below the applicable minimum parcel size. If all lots or parcels are smaller than the minimum parcel size before the property line adjustment, the minimum parcel size pursuant to this section does not apply to those lots or parcels.*

Neither parcel are larger than either the MCC 17.136.090(A)(1) calculated minimum of 85 acres, or the flat statutory EFU minimum of 80 acres. Therefore, the minimum parcel size does not apply. The criterion is met.

2. *If the minimum parcel size in subsection (A)(1) of this section is larger than 80 acres, and a lot or parcel subject to property line adjustment is smaller than the minimum parcel size but larger than 80 acres, the lot or parcel shall not be reduced in size through property line adjustment to less than 80 acres.*

Both parcels are smaller than the minimum lot size. The criterion is met.

3. *Any property line adjustment shall result in a configuration of lots or parcels that are at least as suitable for commercial agriculture as were the parcels prior to the adjustment.*

The land proposed to be transferred is that which is closest to Woodburn-Monitor Rd NE, west adjacent to Yspenia. This land was previously used to farm berries but has ceased to be in recent years. The primary commercial agriculture on the 31.44-acre parcel has historically been grass seed. The proposed property line adjustment does not result in a configuration that will impact the grass seed producing area on the subject property. The criterion is met.

4. *A property line adjustment may not be used to:*
   a. *Decrease the size of a lot or parcel that, before the relocation or elimination of the common property line, is smaller than the minimum lot or parcel size for the applicable zone and contains an existing dwelling or is approved for the construction of a dwelling, if the abutting vacant tract would be increased to a size as large as or larger than the minimum tract size required to qualify the vacant tract for a dwelling;*
   b. *Decrease the size of a lot or parcel that contains an existing dwelling or is approved for*

construction of a dwelling to a size smaller than the minimum lot or parcel size, if the abutting vacant tract would be increased to a size as large as or larger than the minimum tract size required to qualify the vacant tract for a dwelling;

c. Allow an area of land used to qualify a tract for a dwelling based on an acreage standard to be used to qualify another tract for a dwelling if the land use approval would be based on an acreage standard; or

d. Adjust a property line that resulted from a subdivision or partition authorized by a Measure 49 waiver so that any lawfully established unit of land affected by the property line adjustment is larger than the size granted by the waiver.

The proposed property line would not result in any of the above prohibited actions. The criterion is met.

5. Any property line adjustment that results in an existing dwelling being located on a different parcel shall not be subject to the standards in MCC 17.136.030(A) so long as the adjustment:

The proposed property line adjustment does not result in an existing dwelling being located on a different parcel. The criterion does not apply.

Staff finds the proposed property line adjustment will meet all required criteria, provided the zone change and comprehensive plan change are approved.

12. If the Zone Change/Comprehensive Plan Change/Property Line Adjustment were to be approved, staff recommends the following conditions:

1. The applicants shall obtain all permits required by the Marion County Building Inspection Division.

2. The applicants shall obtain all permits required by Marion County Land Development, Engineering, and Permits.

2. Prior to issuance of any building permits, the applicants shall sign and submit a Farm/Forest Declaratory Statement to the Planning Division. This statement shall be recorded by the applicant with the Marion County Clerk after it has been reviewed and signed by the Planning Director.

3. Properties 10 acres or less must be surveyed per ORS 92.060 (7) and the survey submitted for review. Survey checking fee required at the time of review.

4. Property line adjustment deed(s) shall be recorded with the Marion County Clerk's Office. Per ORS 92.190 (4).

5. As an advisory, the applicant should contact the Monitor Fire District to obtain a copy of the District's Recommended Building Access and Premise Identification regulations and the Marion County Fire Code Applications Guide. Fire District access standards may be more restrictive than County standards.