



534 SW 3rd Ave. Ste. 300 • Portland OR 97204 • 503-497-1000 • fax 503-223-0073 • www.friends.org
Southern Oregon Office • PO Box 2442 • Grants Pass OR 97528 • 541-474-1155 • fax 541-474-9389
Willamette Valley Office • 220 East 11th Ave. Ste. 5 • Eugene OR 97401 • 541-653-8703 • fax 503-575-2416
Central Oregon Office • 115 NW Oregon Ave. #21 • Bend OR 97701 • 541-719-8221 • fax 866-394-3089

Land Conservation and Development Commission
635 Capitol St. NE, Suite 150
Salem 97301-2540

May 27, 2010

RE: Agenda Item 7, Proposed Rule Amendments to OAR 660 Division 33 Regarding the Religious Land Use and Institutionalized Persons Act (RLUIPA)

Chair VanLandingham and Members of the Commission:

Thank you for the opportunity to comment on the proposed amendments to OAR 660 Division 33, regarding RLUIPA. 1000 Friends of Oregon is a statewide membership nonprofit organization that works with Oregonians to create livable urban and rural communities, protect family farms and forests, and conserve natural and scenic areas.

The proposed rules before you are the product of extensive discussions among an inclusive and diverse group of interested parties. 1000 Friends of Oregon was actively engaged in these discussions. We believe the proposed amendments take into consideration and address the concerns raised by all parties to the discussions.

The proposed rules are intended to ensure that the use of structures within three miles of an urban growth boundary remain rural in orientation and intensity, thus supporting the underlying purposes of statewide land use planning goals 3 and 14. The proposed rules would do so by limiting the design capacity of an enclosed structure or group of structures to no greater than 100 persons and imposing a minimum distance of one half mile between qualifying structures or groups of structures. Structures exceeding the capacity limits require an exception or must be described in state or local park master plan.

1000 Friends of Oregon supports staff's recommendation that the Commission hold a public hearing and adopt the proposed rule amendments.

Thank you again for the opportunity to comment on this proposal.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Just".

Jim Just
Farm and Forest Policy Analyst
1000 Friends of Oregon



Occupancy statistics for community centers in rural Oregon
 A very limited sample

Facility Name	Location	Occupancy/capacity
Powell Butte Community Center	Halfway between Redmond & Prineville	330
Willamette Community Grange Hall	Near Adair Village	200 + judging from size (4700 sq. ft.)
Svenson Grange	Svenson, Clatsop Co.	300
Parkdale Grange	Parkdale, Hood River Co.	85-100
Springwater Grange	Springwater, Clackamas Co.	150 (2 rooms. 1=60, 1=90)
Columbia Grange Hall	Corbett, Multnomah Co.	200, seated (274 standing)
Mosier Valley Grange	Mosier, Wasco Co.	150-200
Echo Community Center, Ball Room and Auditorium	Echo, Umatilla Co.	250
Mosier Senior Center	Mosier, Wasco Co.	58 used for city council meetings and rented out for other uses.

3/12/10
 MM