

City of Brookings

MEETING AGENDA

CITY COUNCIL

Monday, October 23 2023, 7:00pm

City Hall Council Chambers, 898 Elk Drive, Brookings, OR 97415

CITY COUNCIL

A. Call to Order

B. Pledge of Allegiance

C. Roll Call

D. Oral Requests and Communications from the audience

(*Public Comments on non-agenda items – five (5) minute limit per person, please submit Public Comment Form in advance)

E. Consent Calendar

1. Approve Council minutes for October 9, 2023 [Pg. 1]
2. Receive monthly financial report for September 2023 [Pg. 3]

F. Staff Reports/Public Hearings/Ordinances/Resolutions/Final Orders

1. Review of Planning Commission Decision on APP-1-23 [Pg. 9]
 - a. Planning Commission Staff Report June 27, 2023 & Supplemental Packet [Pg. 14]
 - b. Attachment A - Vicinity Map [Pg. 19]
 - c. Attachment B - Property Photo [Pg. 20]
 - d. Attachment C - Minor Change to CUP document (1999) [Pg. 21]
 - e. Attachment D - Fr. Lindley deposition excerpts, April 12, 2023 [Pg. 38]
 - f. Attachment E - Notice to Abate, April 14, 2023 [Pg. 48]
 - g. Attachment F - Stoel Rives/St. Timothy's Church Appeal letter, April 24, 2023 [Pg. 51]
 - h. Attachment G - Supplemental Packet II, August 1, 2023 [Pg. 204]
 - i. Attachment H - APP-1-23 Final Order, September 5, 2023 [Pg. 225]
 - j. Stoel Rives/St. Timothy's Church First Evidentiary Submission letter, October 18, 2023, with attachments [Pg. 228]

G. Remarks from Mayor, Councilors and City Manager

H. Adjournment

*Public Comment forms and the agenda packet are available on-line at www.Brookings.or.us/PublicCommentForm. Public Brookings City Hall and Chetco Community Public Library. Return completed Public Comment forms to the City Recorder before start of the meeting or during regular business hours.

All public meetings are held in accessible locations. Auxiliary aids will be provided upon request with at least 72 hours advance notification. Please contact 469-1102 if you have any questions regarding this notice.

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- Television – Charter Channel 181

- Internet – 1. Visit the City of Brookings website at www.brookings.or.us. 2. Click on Government (top tab). 3. Click on City Council (right side). 4. Under Agenda & Meetings click "Watch Meeting Live". 5. You will need to download the VLC Media Player. Follow directions and links for your device.

City of Brookings
CITY COUNCIL MEETING MINUTES
City Hall Council Chambers, 898 Elk Drive, Brookings, OR 97415
Monday, October 9, 2023

Call to Order

Mayor Hedenskog called the meeting to order at 7:00 PM

Roll Call

Council Present: Mayor Ron Hedenskog, Councilor President Ed Schrieber, and Councilors Isaac Hodges, Andy Martin, and Michelle Morosky; a quorum present

Staff present: City Manager Janell Howard, Public Works and Development Services Director Anthony Baron and Deputy Recorder Brooklyn Osterhage

Media Present: 2

Others Present: Approximately 24 audience members

Ceremonies

1. Jake Peiper Recognition – Mayor Hedenskog, Janell Howard, and Councilor Schreiber thanked Jake for his years of service to the city as Mayor and City Councilor and presented him with a plaque.

Consent Calendar

1. Approve Council minutes for September 25, 2023
2. Accept Parks and Recreation minutes for July 27, 2023
3. Cancel November 27, 2023 City Council Meeting
4. Cancel December 25, 2023 City Council Meeting

Councilor Schreiber moved, Mayor Hedenskog seconded, and Council voted unanimously to approve the Consent Calendar.

Staff Reports

1. Kidtown Soft Floor Change Order

Tony Baron presented the staff report.

Councilor Hodges moved, Councilor Schreiber seconded, and Council voted unanimously to authorize the City Manager to sign iPlay Safety Surfacing change order in the amount of \$28,536 for additional material required for the soft floor system at Kidtown in Azalea Park.

2. BOEM letter in opposition to Off-shore Wind Energy

Janell Howard presented the staff report.

Comments from the Audience

1. Curry County Commissioner Jay Trost (BOEM taskforce for Curry County) – 1979 Tommielongboat Lane, Brookings spoke in opposition of the BOEM off-shore wind energy proposals and proposed a coastal committee.
2. Jeannie Giumarra – 96160 Cape Ferrelo Road, Brookings spoke in opposition of the BOEM off-shore wind energy proposals.

3. Connie Hunter – 1310 English Court, Brookings spoke in opposition of the BOEM off-shore wind energy proposals.

Councilor Schreiber moved, Councilor Morosky seconded, and Council voted unanimously to authorize the City Manager to submit a letter, as amended, in opposition to BOEM’s proposal for off-shore Wind Energy off the Southern Oregon Coast.

3. Contribution to VFW Post 966

Janell Howard presented the staff report.

Comments from the Audience

1. Jerry Law – VFW Post 966, Brookings spoke on the Post’s fundraising efforts.

2. Connie Hunter – 1310 English Court spoke in support of contributing to VFW Post 966.

Councilor Schreiber moved, Councilor Martin seconded, and Council voted unanimously to approve a contribution of \$2,500 to Brookings VFW Post 966 for roof and building repairs.

4. Authorized Signatories for all City financial activities

Janell Howard presented the staff report.

Mayor Hedenskog moved, Councilor Martin seconded, and Council voted unanimously to adopt Resolution 23-R-1250, authorizing signatories for all City financial activities.

Remarks from Mayor and Councilors

Mayor Hedenskog spoke about Kidtown and the fond memories that came with resurfacing the pickets and seeing the resurfaced Dragon.

Councilor Morosky thanked the Parks and Recreation team for the pickleball courts, they are thriving.

Councilor Schreiber noted Cider Day at the Chetco Valley Museum and encouraged others to volunteer.

Councilor Martin spoke about the VFW Post 966 Fundraising this weekend and mentioned ways to support.

Councilor Hodges expressed fond memories of Kidtown and encouraged others to visit Chetco Valley Museum.

Adjournment

Mayor Hedenskog adjourned the meeting at 8:06 PM.

Respectfully submitted:

ATTESTED:
this 23rd day of October, 2023:

Ron Hedenskog, Mayor

Janell K. Howard, City Recorder

CITY OF BROOKINGS
FUND SUMMARY
FOR THE 3 MONTHS ENDING SEPTEMBER 30, 2023

GENERAL FUND

	BUDGET	PERIOD ACTUAL	YTD ACTUAL	REMAINING BUDGET	PCNT
<u>REVENUE</u>					
TAXES	4,026,050.00	117,652.85	498,070.47	3,527,979.53	12.4
LICENSES AND PERMITS	297,000.00	20,892.02	61,297.46	235,702.54	20.6
INTERGOVERNMENTAL	294,500.00	15,501.74	61,527.93	232,972.07	20.9
CHARGES FOR SERVICES	1,109,500.00	8,320.25	150,654.09	958,845.91	13.6
OTHER REVENUE	140,500.00	5,813.30	164,560.25	(24,060.25)	117.1
TRANSFERS IN	686,105.00	.00	.00	686,105.00	.0
	6,553,655.00	168,180.16	936,110.20	5,617,544.80	14.3
<u>EXPENDITURES</u>					
JUDICIAL:					
PERSONAL SERVICES	38,235.00	3,305.18	10,242.63	27,992.37	26.8
MATERIAL AND SERVICES	12,850.00	700.20	1,390.31	11,459.69	10.8
CAPITAL OUTLAY	.00	.00	.00	.00	.0
	51,085.00	4,005.38	11,632.94	39,452.06	22.8
FINANCE AND ADMINISTRATION:					
PERSONAL SERVICES	423,568.00	30,378.18	98,051.01	325,516.99	23.2
MATERIAL AND SERVICES	228,800.00	22,330.05	64,440.15	164,359.85	28.2
CAPITAL OUTLAY	.00	.00	.00	.00	.0
	652,368.00	52,708.23	162,491.16	489,876.84	24.9
POLICE:					
PERSONAL SERVICES	3,314,004.00	254,926.76	760,421.41	2,553,582.59	23.0
MATERIAL AND SERVICES	231,000.00	10,454.88	70,618.72	160,381.28	30.6
CAPITAL OUTLAY	.00	.00	.00	.00	.0
DEBT SERVICE	109,426.00	14,306.95	14,306.95	95,119.05	13.1
TRANSFERS OUT	.00	.00	.00	.00	.0
	3,654,430.00	279,688.59	845,347.08	2,809,082.92	23.1
FIRE:					
PERSONAL SERVICES	249,661.00	19,721.93	60,743.06	188,917.94	24.3
MATERIAL AND SERVICES	107,500.00	11,817.35	38,318.28	69,181.72	35.6
CAPITAL OUTLAY	.00	.00	.00	.00	.0
DEBT SERVICE	30,580.00	.00	.00	30,580.00	.0
TRANSFERS OUT	.00	.00	.00	.00	.0
	387,741.00	31,539.28	99,061.34	288,679.66	25.6

CITY OF BROOKINGS
FUND SUMMARY
FOR THE 3 MONTHS ENDING SEPTEMBER 30, 2023

GENERAL FUND

	BUDGET	PERIOD ACTUAL	YTD ACTUAL	REMAINING BUDGET	PCNT
PLANNING AND BUILDING:					
PERSONAL SERVICES	240,456.00	14,972.57	46,865.38	193,590.62	19.5
MATERIAL AND SERVICES	93,700.00	797.23	8,799.78	84,900.22	9.4
CAPITAL OUTLAY	.00	.00	.00	.00	.0
TRANSFERS OUT	.00	.00	.00	.00	.0
	334,156.00	15,769.80	55,665.16	278,490.84	16.7
PARKS & RECREATION:					
PERSONAL SERVICES	287,161.00	24,214.89	73,847.29	213,313.71	25.7
MATERIAL AND SERVICES	137,900.00	9,870.00	27,455.64	110,444.36	19.9
CAPITAL OUTLAY	.00	891.90	891.90	(891.90)	.0
DEBT SERVICE	9,981.00	.00	.00	9,981.00	.0
TRANSFERS OUT	.00	.00	.00	.00	.0
	435,042.00	34,976.79	102,194.83	332,847.17	23.5
GOLF COURSE:					
PERSONAL SERVICES	.00	.00	.00	.00	.0
MATERIAL AND SERVICES	900,000.00	.00	.00	900,000.00	.0
CAPITAL OUTLAY	.00	.00	.00	.00	.0
	900,000.00	.00	.00	900,000.00	.0
SWIMMING POOL:					
PERSONAL SERVICES	102,122.00	5,661.84	65,350.30	36,771.70	64.0
MATERIAL AND SERVICES	66,700.00	4,796.13	21,736.37	44,963.63	32.6
CAPITAL OUTLAY	.00	.00	.00	.00	.0
	168,822.00	10,457.97	87,086.67	81,735.33	51.6
NON-DEPARTMENTAL:					
MATERIAL AND SERVICES	175,600.00	6,035.19	29,532.34	146,067.66	16.8
CAPITAL OUTLAY	.00	.00	.00	.00	.0
TRANSFERS OUT	575,000.00	.00	.00	575,000.00	.0
CONTINGENCIES AND RESERVES	829,411.00	.00	.00	829,411.00	.0
	1,580,011.00	6,035.19	29,532.34	1,550,478.66	1.9
	8,163,655.00	435,181.23	1,393,011.52	6,770,643.48	17.1
	(1,610,000.00)	(267,001.07)	(456,901.32)	(1,153,098.68)	(28.4)

CITY OF BROOKINGS
FUND SUMMARY
FOR THE 3 MONTHS ENDING SEPTEMBER 30, 2023

STREET FUND

	BUDGET	PERIOD ACTUAL	YTD ACTUAL	REMAINING BUDGET	PCNT
<u>REVENUE</u>					
INTERGOVERNMENTAL	500,000.00	47,191.73	128,715.96	371,284.04	25.7
OTHER REVENUE	22,000.00	96.00	12,442.00	9,558.00	56.6
TRANSFER IN	100,000.00	.00	.00	100,000.00	.0
	<u>622,000.00</u>	<u>47,287.73</u>	<u>141,157.96</u>	<u>480,842.04</u>	<u>22.7</u>
<u>EXPENDITURES</u>					
EXPENDITURES:					
PERSONAL SERVICES	244,962.00	18,270.90	56,640.07	188,321.93	23.1
MATERIAL AND SERVICES	319,700.00	15,081.11	61,563.56	258,136.44	19.3
CAPITAL OUTLAY	15,000.00	.00	.00	15,000.00	.0
DEBT SERVICE	4,409.00	367.40	1,102.18	3,306.82	25.0
TRANSFERS OUT	234,087.00	.00	.00	234,087.00	.0
CONTINGENCIES AND RESERVES	118,842.00	.00	.00	118,842.00	.0
	<u>937,000.00</u>	<u>33,719.41</u>	<u>119,305.81</u>	<u>817,694.19</u>	<u>12.7</u>
	<u>937,000.00</u>	<u>33,719.41</u>	<u>119,305.81</u>	<u>817,694.19</u>	<u>12.7</u>
	<u>(315,000.00)</u>	<u>13,568.32</u>	<u>21,852.15</u>	<u>(336,852.15)</u>	<u>6.9</u>

CITY OF BROOKINGS
FUND SUMMARY
FOR THE 3 MONTHS ENDING SEPTEMBER 30, 2023

WATER FUND

	BUDGET	PERIOD ACTUAL	YTD ACTUAL	REMAINING BUDGET	PCNT
<u>REVENUE</u>					
SOURCE 03	.00	.00	.00	.00	.0
CHARGES FOR SERVICES	2,039,000.00	194,794.86	610,900.11	1,428,099.89	30.0
OTHER INCOME	48,000.00	3,920.00	17,817.83	30,182.17	37.1
TRANSFERS IN	.00	.00	.00	.00	.0
	<u>2,087,000.00</u>	<u>198,714.86</u>	<u>628,717.94</u>	<u>1,458,282.06</u>	<u>30.1</u>
<u>EXPENDITURES</u>					
WATER DISTRIBUTION:					
PERSONAL SERVICES	432,204.00	34,455.56	101,300.92	330,903.08	23.4
MATERIAL AND SERVICES	183,800.00	4,650.58	56,709.35	127,090.65	30.9
CAPITAL OUTLAY	50,000.00	.00	.00	50,000.00	.0
DEBT SERVICE	28,154.00	4,531.88	8,826.66	19,327.34	31.4
TRANSFERS OUT	24,000.00	.00	.00	24,000.00	.0
	<u>718,158.00</u>	<u>43,638.02</u>	<u>166,836.93</u>	<u>551,321.07</u>	<u>23.2</u>
WATER TREATMENT:					
PERSONAL SERVICES	30,042.00	2,378.58	7,330.63	22,711.37	24.4
MATERIAL AND SERVICES	574,515.00	45,021.95	129,620.76	444,894.24	22.6
CAPITAL OUTLAY	10,000.00	.00	.00	10,000.00	.0
DEBT SERVICE	2,386.00	2,384.49	2,384.49	1.51	99.9
TRANSFERS OUT	742,572.00	.00	.00	742,572.00	.0
CONTINGENCIES AND RESERVES	174,327.00	.00	.00	174,327.00	.0
	<u>1,533,842.00</u>	<u>49,785.02</u>	<u>139,335.88</u>	<u>1,394,506.12</u>	<u>9.1</u>
DEPARTMENT 24:					
CAPITAL OUTLAY	.00	.00	.00	.00	.0
	<u>.00</u>	<u>.00</u>	<u>.00</u>	<u>.00</u>	<u>.0</u>
	<u>2,252,000.00</u>	<u>93,423.04</u>	<u>306,172.81</u>	<u>1,945,827.19</u>	<u>13.6</u>
	<u>(165,000.00)</u>	<u>105,291.82</u>	<u>322,545.13</u>	<u>(487,545.13)</u>	<u>195.5</u>

CITY OF BROOKINGS
FUND SUMMARY
FOR THE 3 MONTHS ENDING SEPTEMBER 30, 2023

WASTEWATER FUND

	BUDGET	PERIOD ACTUAL	YTD ACTUAL	REMAINING BUDGET	PCNT
<u>REVENUE</u>					
SOURCE 03	(4,500.00)	.00	.00	(4,500.00)	.0
CHARGES FOR SERVICES	3,566,300.00	315,045.37	937,793.48	2,628,506.52	26.3
OTHER REVENUE	15,000.00	.00	4,205.55	10,794.45	28.0
TRANSFER IN	.00	.00	.00	.00	.0
	<u>3,576,800.00</u>	<u>315,045.37</u>	<u>941,999.03</u>	<u>2,634,800.97</u>	<u>26.3</u>
<u>EXPENDITURES</u>					
WASTEWATER COLLECTION:					
PERSONAL SERVICES	675,298.00	48,156.51	150,173.23	525,124.77	22.2
MATERIAL AND SERVICES	290,500.00	1,809.01	59,863.85	230,636.15	20.6
CAPITAL OUTLAY	15,000.00	.00	.00	15,000.00	.0
DEBT SERVICE	28,154.00	4,531.70	8,826.14	19,327.86	31.4
TRANSFERS OUT	226,533.00	.00	.00	226,533.00	.0
	<u>1,235,485.00</u>	<u>54,497.22</u>	<u>218,863.22</u>	<u>1,016,621.78</u>	<u>17.7</u>
WASTEWATER TREATMENT:					
PERSONAL SERVICES	45,461.00	3,567.72	10,995.56	34,465.44	24.2
MATERIAL AND SERVICES	1,219,029.00	87,716.67	224,790.77	994,238.23	18.4
CAPITAL OUTLAY	15,000.00	.00	.00	15,000.00	.0
DEBT SERVICE	2,386.00	2,384.49	2,384.49	1.51	99.9
TRANSFERS OUT	1,237,643.00	.00	.00	1,237,643.00	.0
CONTINGENCIES AND RESERVES	256,296.00	.00	.00	256,296.00	.0
	<u>2,775,815.00</u>	<u>93,668.88</u>	<u>238,170.82</u>	<u>2,537,644.18</u>	<u>8.6</u>
	<u>4,011,300.00</u>	<u>148,166.10</u>	<u>457,034.04</u>	<u>3,554,265.96</u>	<u>11.4</u>
	<u>(434,500.00)</u>	<u>166,879.27</u>	<u>484,964.99</u>	<u>(919,464.99)</u>	<u>111.6</u>

CITY OF BROOKINGS
FUND SUMMARY
FOR THE 3 MONTHS ENDING SEPTEMBER 30, 2023

URBAN RENEWAL AGENCY FUND



	BUDGET	PERIOD ACTUAL	YTD ACTUAL	REMAINING BUDGET	PCNT
<u>REVENUE</u>					
TAXES	724,170.00	2,614.43	28,368.37	695,801.63	3.9
INTERGOVERNMENTAL	.00	.00	.00	.00	.0
OTHER REVENUE	2,000.00	.00	.00	2,000.00	.0
TRANSFERS IN	.00	.00	.00	.00	.0
	<u>726,170.00</u>	<u>2,614.43</u>	<u>28,368.37</u>	<u>697,801.63</u>	<u>3.9</u>
<u>EXPENDITURES</u>					
GENERAL:					
PERSONAL SERVICES	.00	.00	.00	.00	.0
MATERIAL AND SERVICES	185,256.00	1,446.25	16,508.75	168,747.25	8.9
CAPITAL OUTLAY	1,460,914.00	1,125.00	1,125.00	1,459,789.00	.1
DEBT SERVICE	.00	.00	.00	.00	.0
TRANSFERS OUT	.00	.00	.00	.00	.0
CONTINGENCIES AND RESERVES	.00	.00	.00	.00	.0
	<u>1,646,170.00</u>	<u>2,571.25</u>	<u>17,633.75</u>	<u>1,628,536.25</u>	<u>1.1</u>
DEPARTMENT 20:					
CAPITAL OUTLAY	.00	.00	.00	.00	.0
	<u>.00</u>	<u>.00</u>	<u>.00</u>	<u>.00</u>	<u>.0</u>
DEPARTMENT 22:					
MATERIAL AND SERVICES	.00	.00	.00	.00	.0
DEBT SERVICE	.00	.00	.00	.00	.0
	<u>.00</u>	<u>.00</u>	<u>.00</u>	<u>.00</u>	<u>.0</u>
DEPARTMENT 24:					
CONTINGENCIES AND RESERVES	.00	.00	.00	.00	.0
	<u>.00</u>	<u>.00</u>	<u>.00</u>	<u>.00</u>	<u>.0</u>
	<u>1,646,170.00</u>	<u>2,571.25</u>	<u>17,633.75</u>	<u>1,628,536.25</u>	<u>1.1</u>
	<u>(920,000.00)</u>	<u>43.18</u>	<u>10,734.62</u>	<u>(930,734.62)</u>	<u>1.2</u>

CITY OF BROOKINGS

COUNCIL AGENDA REPORT

Meeting Date: October 23, 2023

Originating Dept: PWDS


Signature (submitted by)

City Manager Approval

Subject:

Review of Planning Commission Decision on APP-1-23, Notice of Abatement to St. Timothy's Episcopal Church.

Recommended Motion:

Affirm the Planning Commission's denial of St. Timothy's Episcopal Church's appeal of the Notice of Abatement issued April 14, 2023 for 401 Fir Street, Assessor's Map & Tax No. 4113-05BC-07300 based on the findings and conclusions stated in the Council Agenda Report.

Financial Impact: None

Background/Discussion:

St. Timothy's Episcopal Church ("the Church"), located at 401 Fir Street, Brookings, Oregon, operates in the R-1-6 Single-Family Residential District under a "de facto" conditional use permit. The Church existed and was operating prior to 1989, when the Brookings Land Development Ordinance was adopted, and therefore was considered to be a legal non-conforming use at that time. (Attachments A & B - Vicinity Map/Property Photo)

In 1999, the Church applied for and was granted by the Planning Commission a "minor change" to its building (adding 392 square feet to the church building and adding 8 new parking spaces). (Attachment C – Minor Change to CUP documents)

In late 2022, the City became aware, through several sources (review of the lawsuit complaint filed by the Church, the Church website) that the Church was operating a variety of services which are not typically associated with churches in residential zones. These services include a "day program", "legal clinic", and an "advocacy team/case worker assistance."

The City has also become aware of information suggesting that the number of people served by the Church's social services activities exceeds the number of church parishioners.

Confirmation that the Church was providing these "social services" was provided by Father Bernie Lindley's deposition, which was taken on April 12, 2023 as part of discovery in the lawsuit filed by the Church against the City. During the deposition, Fr. Lindley admitted the Church operates a "day program" on Mondays, Wednesdays, and Fridays from 9:00 AM until 12:00 PM.

This “day program” provides access to showers and internet services, as well as weekly HIV/HEP-C screening. Fr. Lindley also said that the Church operates a “legal” clinic for 19-20 hours per week. The Church also conducts an “advocacy team/case worker assistance” program during the same hours as the “day program” or other hours as needed. The Church has at least 6-7 paid employees for these activities, as well as several volunteers. Finally, the Church also hosts a primary health care provider one day a month. (Attachment D – Fr. Lindley deposition excerpts)

On April 14, 2023, the Church was issued a Notice to Abate (Attachment E) for operating a variety of social services, including an outreach clinic, a day program, and an advocacy program, in violation of 17.01.040 (Compliance with code provisions in the Brookings Municipal Code (BMC)). The church was notified that, in order to avoid enforcement and potential civil penalties, it must cease the operation of these activities, which are not allowed in an R-1-6 zone.

On April 24, 2023, the Church’s attorney sent a letter appealing the Notice to Abate. (Attachment F)

On September 5, 2023, the Planning Commission issued a Final Order denying St. Timothy’s appeal. (Attachment H)

On September 19, 2023, the City Council voted to review the Planning Commission’s decision, pursuant to BMC 17.152.040.

(NOTE: The abatement of operation of a Benevolent Meal Service without a conditional use permit is being suspended temporarily due to ongoing litigation between the church and the City. This temporary suspension of abatement of the operation of a Benevolent Meal Service without a conditional use permit may be lifted in the future. If the temporary suspension is lifted, the church will be issued a new Notice of Abatement of operation of a Benevolent Meal Service without a conditional use permit.)

AUTHORITY FOR COUNCIL REVIEW

The BMC allows churches in the Single-Family Residential District with a conditional use permit per BMC 17.20.040.B. The BMC does not allow the operation of a “day program”, an “advocacy program”, and a “legal clinic” in an R-1-6 Single-Family Residential District either outright or with a conditional use permit.

BMC 17.160.020 designates any violations of the Land Development Code as public nuisances that may be abated and removed under BMC 8.15.090. Failure to correct the violation could result in civil penalties of up to \$720.00 per day that the violation exists, per BMC 1.05.010.

The BMC does not provide for an objection or appeal to the City Manager on the substance of the abatement notice – it must either be appealed to municipal court or, (as in this case) if it is a land use matter, to the Planning Commission.

BMC 8.15.090.C states that for BMC Title 17 cases (Land Development Code), “where the potential violation is a matter of ambiguity, the code enforcement officer determination of violation may be appealed to the Planning Commission pursuant to Chapter 17.156 BMC.”

BMC 17.156.010 provides:

“In the event of an ambiguity in this title affecting enforcement, the Planning Commission shall have

the power to hear and decide appeals from administrative interpretations and to declare the meaning and intent, and interpret the provisions of this code. In thus resolving ambiguities, being considered in this appeal, the Planning Commission shall so interpret this code as to carry out BMC 17.01.020 and the expressed purpose of the zoning district involved.”

BMC 17.15.040 provides:

“Within 15 days following the postmark date on the mailing of the final order of the Planning Commission decision, the City Council may, on its own motion, initiate proceedings to review the action. The City Council shall give notice of the time and place when the decision of the Planning Commission will be reviewed. Notice of hearing will be given in the manner prescribed in Chapter 17.84 BMC.”

ANALYSIS, FINDINGS, AND CONCLUSIONS

The Church requested that the Planning Commission determine that the Church’s “social services” activities at its property do not violate the BMC for one or both of the following reasons:

- 1) these activities are “typical” functions conducted by churches and are considered part of a church use, and/or
- 2) these activities are part of the Church’s non-conforming use of the property and are allowed to continue.

The analysis for each of these requests is discussed below.

Are the Day Program, Advocacy Program, and Legal Clinic typical functions conducted by churches?

In the April 24, 2023 appeal letter, the Church asserts that the Day Program, Advocacy Program, and Legal Clinic are “typical functions” conducted by churches and therefore are allowed without having to seek any permission from the City.

In support of this assertion, the letter cites news articles and web sites that discuss different types of social services offered by various churches from around the nation. It is not apparent whether any of these churches are located in residential zones or have any other similarities to the matter currently before the Planning Commission.

In addition, the attorney’s letter cites various verses of scripture to support the assertion that the types of social services offered by the Church are typically considered church functions where they occur as part of a church use.

The letter also states that typical elements of a church include providing “advice”, “referrals”, and “fellowship” to those in need, as well as providing a sanctuary for prayer and providing advice to the community.

The BMC does not define “church” or provide any details about what activities are typical and/or allowed for this use.

One dictionary definition of “church” is “a building for public and especially Christian worship.”

See, Merriam-Webster Dictionary, <https://www.merriam-webster.com/dictionary/church> accessed via Google search on June 14, 2023.

Another definition is similar: “a building used for public Christian worship.” See, Oxford English Dictionary, accessed via Google search on June 14, 2023.

Both of these definitions only refer to “worship,” not any other religious activities.

The City is not aware of any information suggesting that when people are seeking and obtaining social services at St. Timothy’s there is any worship/religious service being performed. The only worship or religious service at St. Timothy’s occurs on Wednesdays from 12:00 to 12:45 PM and Sundays from 10:00 to 11:30 AM (see Attachment D).

The Church has not provided adequate evidence to show that these activities are “typical” functions conducted by churches and are considered part of a church use.

Are the Day Program, Advocacy Program, and Legal Clinic part of the Church’s non-conforming use?

As mentioned above, the Church existed and was operating prior to 1989, when the Brookings Land Development Ordinance was adopted. Therefore, the Church was considered to be a legal non-conforming use at that time.

BMC 17.120.010 (Continuation of a nonconforming use) provides that a lawfully preexisting use of a structure or site, which does not conform to the regulations for the district in which it is located, shall be deemed to be a lawful, nonconforming use and may be continued, subject to regulations regarding maintaining, moving, altering, or enlarging the nonconforming structure. The BMC does not contain any provisions regarding altering or increasing the activities occurring on or within the property or the nonconforming structure.

An argument can be made that the Church considered itself to have a conditional use permit in 1999, since it applied for (and was granted) a “minor change” to its building pursuant to the BMC provisions applying to conditional uses.

Whether the Church is considered to be a legal nonconforming use or a permitted conditional use is not dispositive, since the legal analysis is very similar for both.

As mentioned above, the BMC is silent regarding altering or increasing the activities occurring on or within the property or the nonconforming structure. Other cities’ codes vary, but the majority appear to allow, or at least not expressly prohibit, expansion of nonconforming uses, most commonly through a conditional-use procedure. A few do not allow any alteration that includes an expansion of the nonconforming use.

The general rule is that a reasonable increase in the intensity of a use, without physical change, is permitted. See 4 Arden H. Rathkopf & Daren A. Rathkopf, *The Law of Zoning and Planning* §51A.04[2], at 51A-49 (1991); 6 Patrick J. Rohan, *Zoning and Land Use Controls* §41.03[3][b], at 41-87 to 41-91 (1991).

The Council can consider whether the “social service”-type activities occurring at St. Timothy’s constitute a reasonable increase in the intensity and use of the church.

Another way that some jurisdictions analyze requests for intensification of a nonconforming use or a conditional use is whether such intensification would have “no greater adverse impact” to the neighborhood than the existing use. *See* ORS 215.130 (regarding nonconforming uses on property within county jurisdiction).

In determining whether a nonconforming use has been established, and the extent of the nonconforming use, a factual determination is needed regarding what uses were in place at the Church in 1989 (when the Land Development Ordinance was adopted). The Church has the burden of proving both that the use existed in 1989, and what the level of use was at that time. *See Lane County v. Bessett*, 46 Or App 319, (1980); *Tylka v. Clackamas County*, 28 Or LUBA 417 (1994); *Fraley v. Deschutes County*, 32 Or LUBA 27, af’d, 145 Or App 484 (1996); *Smith v. Lane County*, 21 Or LUBA 228 (1991).

In the April 24, 2023 appeal letter, the Church asserts that it has continuously conducted “social services” since its establishment (prior to adoption of the Brookings Land Development Ordinance in 1989), but provides no evidence to support that assertion.

In his April 12, 2023 deposition, Fr. Lindley stated that the “advocacy program” began in “approximately” 2018. That provides evidence that at least the “advocacy program” began fairly recently, many years *after* the church was established. This shows that the nonconforming use and/or unpermitted conditional use was altered and/or expanded, which is not allowed under the City’s code.

It does not appear that the Church has met its burden of proving both, that its provision of “social services” existed in 1989 and/or what the level or intensity of those services was at that time. Therefore, the Church is required to abate these “social service” activities by discontinuing these activities at the church location.

Attachments:

- a. Planning Commission Staff Report June 27, 2023 & Supplemental Packet
- b. Attachment A - Vicinity Map
- c. Attachment B - Property Photo
- d. Attachment C - Minor Change to CUP documents (1999)
- e. Attachment D - Fr. Lindley deposition excerpts, April 12, 2023
- f. Attachment E - Notice to Abate, April 14, 2023
- g. Attachment F – Stoel Rives/St. Timothy’s Church Appeal letter, April 24, 2023
- h. Attachment G –Supplemental Packet II, August 1, 2023
- i. Attachment H – APP-1-23 Final Order, September 5, 2023
- j. Stoel Rives/St. Timothy’s First Evidentiary Submission Letter, October 18, 2023, with attachments

CITY OF BROOKINGS PLANNING COMMISSION
STAFF AGENDA REPORT

SUBJECT: Appeal to Planning Commission
FILE NO: APP-1-23
REPORT DATE: June 15, 2023

HEARING DATE: June 27, 2023
AGENDA ITEM NO: 4.2

GENERAL INFORMATION

APPLICANT/OWNER: Diocese of Oregon, St. Timothy's Episcopal Church

REQUEST: Appeal to the Planning Commission of a Notice of Abatement issued April 14, 2023 to St. Timothy's Episcopal Church

TOTAL LAND AREA: @.63 acres/@27,600 square feet

LOCATION: Subject property is located at 401 Fir Street.

ASSESSOR'S NUMBER: 4113-05BC Tax Lot 07300

ZONING / COMPREHENSIVE PLAN INFORMATION

EXISTING: R-1-6 (Single-family residential)

PROPOSED: Same

SURROUNDING: Subject property is surrounded by R-1 (Single-family residential) to the north, south and west and P/OS (Public Open Space) to the east

COMP. PLAN: Residential

LAND USE INFORMATION

EXISTING: Subject property is developed a with a two level church

SURROUNDING: The subject property is surrounded by residentially developed parcels to the north, south and west and Azalea Park to the east

PUBLIC NOTICE: Mailed to all property owners within 250 feet of subject property and published in local newspaper.

APPLICABLE CRITERIA: Land Development Code –

- a. Chapter 8.15.090 - General abatement procedure
- b. Chapter 17.156 - Appeal to Planning Commission
- c. Chapter 17. 01 Section 17.01.040 – Compliance with Code Provisions
- d. Chapter 17.20.040.B. - Conditional uses. (in SINGLE-FAMILY RESIDENTIAL (R-1) DISTRICT)
- e. Chapter 17.120.010 - Continuation of a nonconforming use

BACKGROUND INFORMATION

St. Timothy's Episcopal Church ("the Church"), located at 401 Fir Street, Brookings, Oregon, operates in the R-1-6 Single-Family Residential District under a "de facto" conditional use permit. The Church existed and was operating prior to 1989, when the Brookings Land Development Ordinance was adopted, and therefore was considered to be a legal non-conforming use at that time. (Attachments A & B - Vicinity Map/Property Photo).

In 1999, the Church applied for and was granted by the Planning Commission a "minor change" to its building (adding 392 square feet to the church building and adding 8 new parking spaces). (Attachment C – Minor Change to CUP documents)

In late 2022, the City became aware, through a variety of sources (review of the lawsuit complaint filed by the Church, the Church website) that the Church was operating a variety of services which are not typically associated with churches in residential zones. These services include a "day program", "legal clinic", and an "advocacy team/case worker assistance."

The City has also become aware of information suggesting that the number of people served by the Church's social services activities exceeds the number of church parishioners.

Confirmation that the Church was providing these "social services" was provided by Father Bernie Lindley's deposition, which was taken on April 12, 2023 as part of discovery in the lawsuit filed by the Church against the City. During the deposition, Fr. Lindley admitted the Church operates a "day program" on Mondays, Wednesdays, and Fridays from 9:00 AM until 12:00 PM.

This "day program" provides access to showers and internet services, as well as weekly HIV/HEP-C screening. Fr. Lindley also said that the Church operates a "legal" clinic for 19-20 hours per week. The Church also conducts an "advocacy team/case worker assistance" program during the same hours as the "day program" or other hours as needed. The Church has at least 6-7 paid employees for these activities, as well as several volunteers. Finally, the Church also hosts a primary health care provider one day a month. (Attachment D – Fr. Lindley deposition excerpts)

On April 14, 2023, the Church was issued a Notice to Abate (Attachment E) for operating a variety of social services, including an outreach clinic, a day program, and an advocacy program, in violation of 17.01.040 (Compliance with code provisions in the Brookings Municipal Code (BMC)). The church was notified that, in order to avoid enforcement and potential civil penalties, it must cease the operation of these activities, which are not allowed in an R-1-6 zone.

On April 24, 2023 letter, the Church's attorney sent a letter appealing the Notice to Abate. (Attachment F)

(NOTE: The abatement of operation of a Benevolent Meal Service without a conditional use permit is being suspended temporarily due to ongoing litigation between the church and the city. This temporary suspension of abatement of the operation of a Benevolent Meal Service without a conditional use permit may be lifted in the future. If the temporary suspension is lifted, the church will be issued a new Notice of Abatement of operation of a Benevolent Meal Service without a conditional use permit.)

AUTHORITY FOR PLANNING COMMISSION REVIEW

The BMC allows churches in the Single-Family Residential District with a conditional use permit per BMC 17.20.040.B. The BMC does not allow the operation of a "day program", and an "advocacy program", and a "legal clinic" in an R-1-6 Single-Family Residential District either outright or with a conditional use permit.

BMC 17.160.020 designates any violations of the Land Development Code as public nuisances that may be abated and removed under BMC 8.15.090. Failure to correct the violation could result in civil penalties of up to \$720.00 per day that the violation exists, per BMC 1.05.010.

The BMC does not provide for an objection or appeal to the City Manager on the substance of the abatement notice – it must either be appealed to municipal court, or, (as in this case) if it is a land use matter, to the Planning Commission.

BMC 8.15.090.C states that for BMC Title 17 cases (Land Development Code), “where the potential violation is a matter of ambiguity, the code enforcement officer determination of violation may be appealed to the planning commission pursuant to Chapter 17.156 BMC.”

BMC 17.156.010 provides:

“In the event of an ambiguity in this title affecting enforcement, the planning commission shall have the power to hear and decide appeals from administrative interpretations and to declare the meaning and intent, and interpret the provisions of this code. In thus resolving ambiguities, being considered in this appeal, the planning commission shall so interpret this code as to carry out BMC 17.01.020 and the expressed purpose of the zoning district involved.”

ANALYSIS, FINDINGS, AND CONCLUSIONS

The Church requests that the Planning Commission determine that the Church’s “social services” activities at its property do not violate the BMC for one or both of the following reasons:

- 1) these activities are “typical” functions conducted by churches and are considered part of a church use, and/or
- 2) these activities are part of the Church’s non-conforming use of the property and are allowed to continue.

The analysis for each of these requests is discussed below.

Are the Day Program, Advocacy Program, and Legal Clinic typical functions conducted by churches?

In the April 24, 2023 appeal letter, the Church asserts that the Day Program, Advocacy Program, and Legal Clinic are “typical functions” conducted by churches and therefore are allowed without having to seek any permission from the City.

In support of this assertion, the letter cites news articles and web sites that discuss different types of social services offered by various churches from around the nation. It is not apparent whether any of these churches are located in residential zones or have any other similarities to the matter currently before the Planning Commission.

In addition, the attorney’s letter cites various verses of scripture to support the assertion that the types of social services offered by the Church are typically considered church functions where they occur as part of a church use.

The letter also states that typical elements of a church include providing “advice”, “referrals”, and “fellowship” to those in need, as well as providing a sanctuary for prayer and providing advice to the community.

No support is found in the attorney's letter to show that all of the uses provided by the Church's programs, such as showers, legal clinics, and health care are "typical" elements of a church.

The BMC does not define "church" or provide any details about what activities are typical and/or allowed for this use.

One dictionary definition of "church" is "a building for public and especially Christian worship." See, Merriam-Webster Dictionary, <https://www.merriam-webster.com/dictionary/church> (last visited June 14, 2023).

Another definition is similar: "a building used for public Christian worship." See, Oxford English Dictionary, accessed via Google search on June 14, 2023.

Both of these definitions only refer to "worship," not any other religious activities.

The City is not aware of any information suggesting that when people are seeking and obtaining social services at St. Timothy's there is any worship/religious service being performed. The only worship or religious service at St. Timothy's occurs on Wednesdays from 12:00 to 12:45 PM and Sundays from 10:00 to 11:30 AM (see Attachment D).

The Church has not provided adequate evidence to show that these activities are "typical" functions conducted by churches and are considered part of a church use.

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An argument can be made that the Church considered itself to have a conditional use permit in 1999, since it applied for (and was granted) a "minor change" to its building pursuant to the BMC provisions applying to conditional uses.

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In determining whether a nonconforming use has been established, and the extent of the nonconforming use, a factual determination is needed regarding what uses were in place at the Church in 1989 (when the Land Development Ordinance was adopted). The Church has the burden of proving both that the use existed in 1989, and what the level of use was at that time. See *Lane County v. Bessett*, 46 Or App 319, (1980); *Tylka v. Clackamas County*, 28 Or LUBA 417 (1994); *Fraley v. Deschutes County*, 32 Or LUBA 27, af’d, 145 Or App 484 (1996); *Smith v. Lane County*, 21 Or LUBA 228 (1991).

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In his April 12, 2023 deposition, Fr. Lindley stated that the “advocacy program” began in “approximately” 2018. That provides evidence that at least the “advocacy program” began fairly recently, many years *after* the church was established. This shows that the nonconforming use and/or unpermitted conditional use was altered and/or expanded, and the Church should have requested a conditional use permit for adding these uses.

It does not appear that the Church has met its burden of proving both that its provision of “social services” existed in 1989 and/or what the level or intensity of those services was at that time. Therefore, the Church is required to abate these “social service” activities and apply for a conditional use permit to conduct such activities at the Church location.

RECOMMENDATION

Staff recommends DENIAL of APP-1-23, based on the staff report and the evidence contained in the attachments to the staff report.

Staff will prepare a FINAL ORDER to be considered at the next meeting.

ATTACHMENTS

Attachment A - Vicinity Map

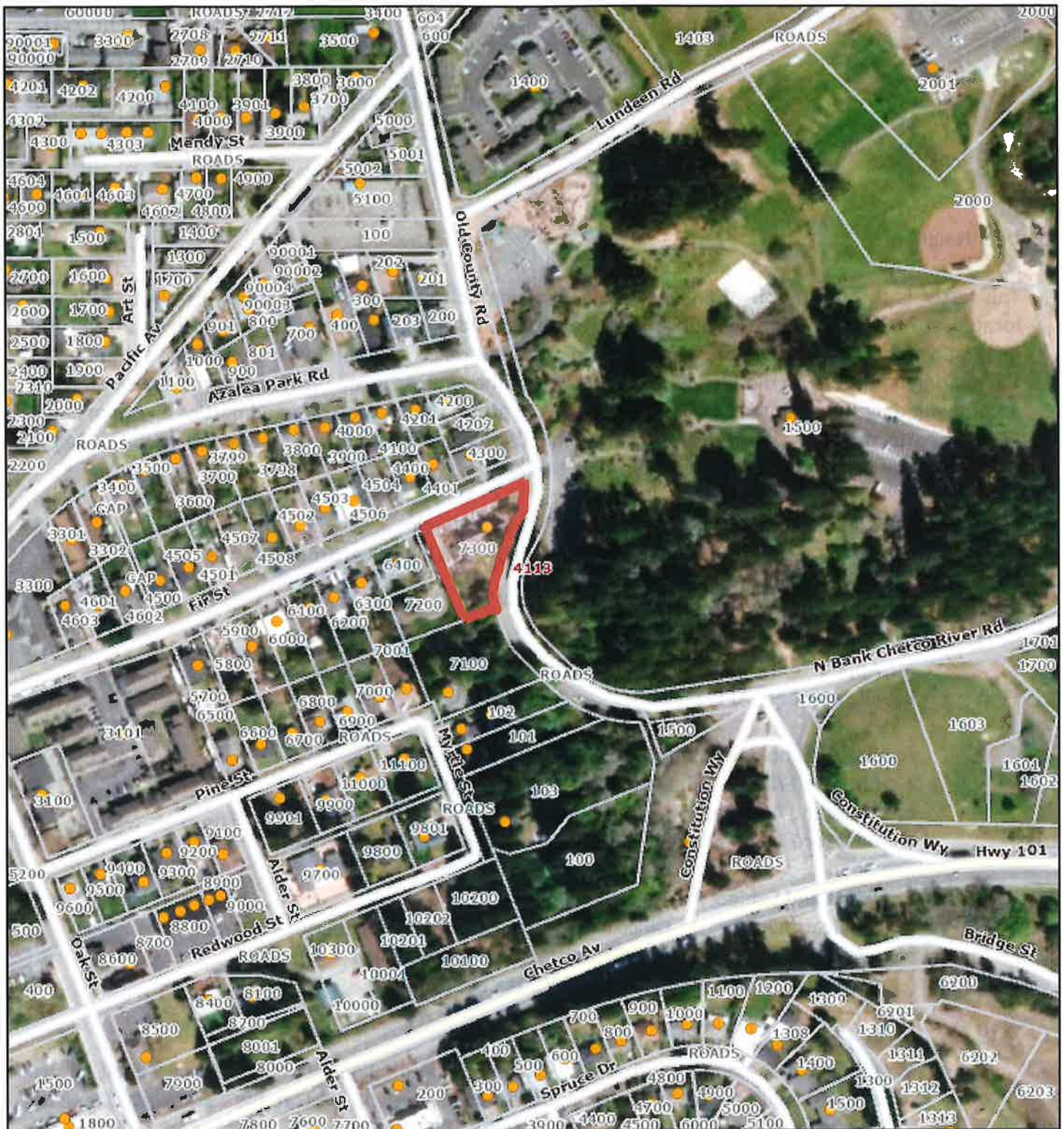
Attachment B - Property Photo

Attachment C - Minor Change to CUP documents (1999)

Attachment D - Fr. Lindley deposition excerpts (April 12, 2023)

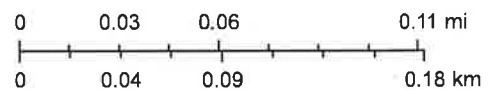
Attachment E - Notice to Abate (April 14, 2023)

Attachment F – St. Timothy’s Church Appeal letter (April 24, 2023)



6/1/2023, 11:18:21 AM

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Bureau of Land Management, State of Oregon, State of Oregon DOT, State of Oregon GEO, Esri Canada, Esri, HERE, Garmin, USGS, EPA, USDA, Maxar



Request for Minor Change to Conditional Use Permit
St. Timothy's Episcopal Church

Proposed improvements: To accommodate our growing congregation, we are planning to extend our nave 16 feet toward Azalea Park. Because our original church building was in existence before city zoning ordinances, we will only need a minor change to our current conditional use permit.

A. Compliance with comprehensive plan: We feel that St. Timothy's is an asset to our neighborhood and that adding onto our church conforms with the comprehensive plan.

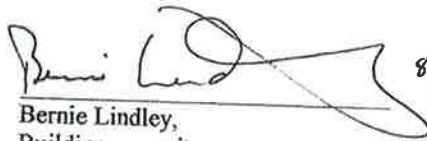
B. Adequate space: Our building is on a double lot. There is adequate room for the addition to the nave and for the extra parking. We did have a problem with the side-yard setback closest to Old County Road, but we have obtained a variance from the planning commission.


C. Traffic: The increase in traffic will be about seven cars and will typically occur on Sunday morning when the streets are not very busy. Our addition will have a negligible impact on traffic congestion.

D. Adverse impact on adjoining properties: Because we are on a corner lot, and closest property to the new addition is Azalea Park, we will have no detrimental impact on our neighbors.

E. Preservation of scenic attributes: We are proud of the architecture of our church. Our new addition will simply extend the original lines 16 feet. It is likely that the casual observer won't notice the change to the building.

This request is submitted by Bernie Lindley with the approval of the building committee at St. Timothy's and the approval of the Rev. William Smith, Vicar.

 8/4/99
Bernie Lindley,
Building committee member


Rev. William Smith
Vicar, St. Timothy's

MC - 1 - 99 (minor change) to a "De Facto" Conditional use Permit.
"Findings of Fact" above

CITY OF BROOKINGS

898 Elk Drive
Brookings, Oregon 97415
Phone (541) 469-2163
Fax (541) 469-3650
cityhall@brookingsor.org

The Home of Winter Flowers



September 8, 1999

St. Timothy's Episcopal Church
PO Box 1237
Brookings OR 97415

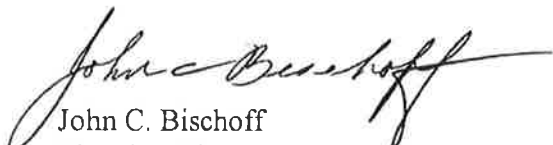
RE: Your application for a minor change to a de facto conditional use permit to allow a 16 foot extension of the chapel areas of the church building (File No. MC-1-99).

This is to inform you of the action taken at the meeting of the Brookings Planning Commission on the above referenced matter.

At the Planning Commission meeting of September 7, 1999, the Commission adopted the Final ORDER and Findings of Fact document (enclosed) in the approval of the application. Approval of this conditional use permit will expire one year from the date of approval unless your project comes under substantial construction within that period.

Please be advised that decisions of the Planning Commission may be appealed to the City Council within fifteen (15) days after the decision of the Commission, pursuant to the Land Development Code, Section 156. If there are any questions please feel free to contact the Planning Offices.

Sincerely,


John C. Bischoff
Planning Director

BEFORE THE PLANNING COMMISSION
CITY OF BROOKINGS, COUNTY OF CURRY
STATE OF OREGON

**In the matter of Planning Commission File No.) Final ORDER
MC-1-99; a request for a minor change to a) and Findings of
conditional use permit; St. Timothy's Church,) Fact
applicant)**

ORDER approving of an application for a minor change to what is considered to be a "de facto" Conditional Use Permit to expand the existing church building by extending the chapel area 16 feet to the east; Assessor's Map 41-13-5BC, Tax Lot 7300; R-1-6 (Single Family Residential, 6,000 sq. ft. minimum lot size).

WHEREAS:

1. The Planning Commission duly accepted the application filed in accordance with the Brookings Land Development Code pursuant to Section 140 Conditional Use Permits; and
2. Such application is required to show evidence that all of the following criteria has been met:
 - A. The proposal is in compliance with the Comprehensive Plan.
 - B. The site for the proposed use is adequate in size and shape to accommodate said use and all yards, spaces, walls and fences, parking, loading, landscaping and other features required by this code.
 - C. The site for the proposed use relates to streets and highways adequate in width and degree of improvement to handle the quantity and kind of vehicular traffic that would be generated by the proposed use.
 - D. The proposed use will have minimal adverse impact upon adjoining properties and the improvements thereon. In making this determination, the commission shall consider, but not be limited to, the proposed location of the improvements on the site, vehicular egress/ingress and internal circulation, pedestrian access, setbacks, height and bulk of buildings, walls and fences, landscaping, screening, exterior lighting and signing.
 - E. In areas designated as requiring preservation of historic, scenic or cultural attributes, proposed structures will be of a design complimentary to the surrounding area.
3. The Brookings Planning Commission duly set this matter upon the agenda of a public meeting and considered the above described application with the public hearing a matter of record of the Planning Commission meeting of September 7, 1999; and
4. At the public meeting on said conditional use permit application, evidence and testimony was presented by the applicant and recommendations were received from and presented by the Planning Director in the form of a Staff Agenda Report, dated August 26, 1999 and oral presentation of same; and

5. At the conclusion of the presentation of the applicant, Planning Director and the public, after consideration and discussion the Brookings Planning Commission, upon a motion duly seconded, approved the request for the subject conditional use permit and directed staff to prepare a Final ORDER with the findings set forth therein for the approval of said application.

THEREFORE, LET IT BE HEREBY ORDERED that the application of the conditional use permit on the subject parcel is approved. This approval is supported by the following findings and conclusions:

FINDINGS

1. The applicant is requesting a minor change to what is considered to be a "de facto" conditional use permit to expand the existing chapel area by approximately 392 sq. ft. and to add a total of 8 new parking spaces on a 0.67 acre lot.
2. The subject property is zoned R-1-6 (Single Family Residential, 6,000 sq. ft. minimum lot size) and is designated as residential by the Comprehensive Plan.
3. Churches are allowed in the residential zones as a conditional use with a side and rear yard setback of 30 feet..
4. The exiting church building has been on the subject property since before the city had zoning regulations and is thus considered to have a "de facto" conditional use permit.
5. The proposed expansion will consist of extending the chapel area 16 feet to the east.
6. At its closest point the exiting building is 22 feet from the easterly property line. The proposed expansion will place the building 12 feet from the property line.
7. The applicant has requested and received a variance for the new side yard setback (File No. VAR-2-99).
8. Section 92, Off- Street Parking And Loading Regulations, of the Land Development Code, requires churches to provide one parking space for each 4 seats in the main gathering area. The church currently has 17 parking spaces.
9. The proposed building expansion will provide for a total of 80 seats which, under Section 92, would require 20 parking spaces.
10. Fir St. is a paved travel way within a right-of-way of 55 feet with no other improvements adjacent to the subject property.
11. Old County Rd. is a paved travel way with in a 60 foot right-of-way with no other improvements adjacent to the subject property.
12. Development surrounding the subject property consists of single family residential on the north, west and south. The area to the east is the Azalea City Park.

CONCLUSIONS

1. The total building footprint after the expansion will not occupy more than 12% of the total lot area. Although the original parking backs directly on to the existing street, this parking arrangement predates any city ordinance governing parking and is considered to be grand fathered. The application for a minor change to the "de facto" use permit does allow the Planning Commission to require the parking to be relocated to comply with Section 92. However, although the lot is large enough to provide for the parking, the topography does not. Requiring the existing parking to meet code would effectively negate the earlier approval of the variance and make the proposed building expansion moot. Since there have been no complaints or accidents resulting from the existing arrangement, there is no reason to move the parking. The new parking area of 9 spaces meets the requirements of Section 92.

The existing building meets the setback requirements of the R-1-6 Zone except on the east side which does not meet the 30 foot set back requirement. The proposed expansion will decrease this setback even further, however, since this is the side adjacent to Azalea Park, a variance has been issued to allow a lesser setback. With the variance which was approved earlier, the subject site is adequate in size to accommodate the proposed building expansion and additional parking.

2. The proposed expansion to the chapel area of the existing church building will add capacity for approximately 20 seats. Using the seating to parking space ratio of Section 92, this would equate to 5 more cars on the street before and after services. This increase is insignificant and does not impact the ability of Fir St. to handle traffic. The conditions of approval will require the relocation of the church's sign which obscures the view of cars on Fir St. trying to enter Old County Rd.
3. The proposed expansion will have little or no impact on the surrounding neighborhood. The expanded end of the building, because of existing landscaping will hardly be noticeable to the surrounding neighbors. As stated above the amount of traffic generated by the proposed expansion will not create a negative impact on the neighborhood.
4. The existing church building could be considered to be a historical attribute since it has been on the site for so long. The addition to the building will be of the same design and follow the same architectural line as the existing building. Azalea Park, located to the east, is a scenic attribute, however, the proposed addition will not detract from the park's scenic qualities.
5. With the approved variance the proposed expansion of the existing church building meets the requirements of the criteria addressed above and is consistent with the other applicable provisions of the Land Development Code. Although the Comprehensive Plan does not specifically address churches, allowing the proposed expansion will utilize the existing land more efficiently and will not require the church to relocate to accommodate a growing congregation.

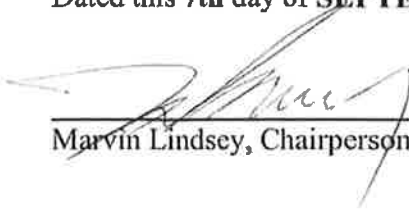
CONDITIONS OF APPROVAL

The conditions of approval are attached to this document and are made apart thereof.

LET IT FURTHER BE OF RECORD that the Planning Commission approved the requested


Conditional Use Permit.

Dated this 7th day of SEPTEMBER, 1999.



Marvin Lindsey, Chairperson

ATTEST:



John C. Bischoff, Planning Director

CONDITIONS OF APPROVAL
CONDITIONAL USE PERMIT

MC-1-99

September 7, 1999

General Conditions

1. Approval of this conditional use permit will expire one year from approval, unless the project comes under substantial construction within that period. The Planning Commission may extend the permit for an additional one year period at the request of the applicant.
2. The conditions stated herein are mandatory and must be completed. Failure to comply with any condition will result in the review and possible revocation of your permit pursuant to Section 140.110, Violation of Conditions, of the Land Development Code. The loss of your permit will result in the closure of your business.
3. The final construction plans shall be in substantial conformance with the submitted preliminary site plan as amended herein and as approved by the Planning Commission. Substantial changes to the approved preliminary plat require re-approval by the Planning commission.
4. Improvement work shall not be commenced until construction plans including grading have been approved by the City Engineer.
5. All costs of plans checks and inspections by the City Engineer shall be paid by the applicant to the city.
6. Information on the construction plans shall be pursuant to the City of Brookings Standard Specifications document dated August, 1988.
7. Prior to the issuance of an occupancy permit, all street, infrastructure and storm drain construction must be completed.
8. Prior to the issuance of an occupancy permit the new parking area shall be buffered with a sight obscuring fence or by landscaping along the westerly property line, so as to screen the parking from the adjoining residential uses.
9. All outdoor lighting shall be directed and/or shielded so as to prevent light from falling directly on adjoining properties.
10. All buildings shall meet the yard setback and separation requirements pursuant to of the Land Development Code except as allowed by the approved variance (File No. VAR-2-99).
11. All outdoor trash containers shall be screened from view with a decorative fence and gate at least 6 feet high.
12. The existing church sign shall be moved to a location that does not block the view of cars at the stop sign on Fir St. trying to enter Old County Rd.

CITY OF BROOKINGS PLANNING COMMISSION
STAFF AGENDA REPORT

SUBJECT: Conditional Use Permit
FILE NO: MC-1-99
HEARING DATE: September 7, 1999

REPORT DATE: August 24, 1999
ITEM NO: 8.2

GENERAL INFORMATION

APPLICANT: St. Timothy's Church.

REPRESENTATIVE: Bernie Lindley.

REQUEST: A minor change to a de facto conditional use permit to allow a 16 foot extension of the chapel area of the church building.

TOTAL LAND AREA: 0.67 acres.

LOCATION: In the southwest corner of Fir St. and Old County Rd. 401 Fir St.

ASSESSOR'S NUMBER: 41-13-5CB, Tax Lot 7300.

ZONING / COMPREHENSIVE PLAN INFORMATION

EXISTING: R-1-6 (Single Family Residential, 6,000 sq. ft. minimum lot size).

PROPOSED: Same.

SURROUNDING: North, West and South-R-1-6; East-P/OS (Public Open Space).

COMP. PLAN: Residential.

LAND USE INFORMATION

EXISTING: Church building.

PROPOSED: Expansion of existing church building

SURROUNDING: North, West and South-Residential uses; East-Azalea Park.

PUBLIC NOTICE: Mailed to all property owners within 250 feet of subject property and published in local news paper.

BACKGROUND INFORMATION

The subject property is an irregular shaped, 0.67 acre parcel of land located in the southwest corner of Old County Rd. and Fir St. The property fronts on Old County Rd. on the east and Fir St. on the north, however, the Fir St. frontage provides the only usable access to the property. The subject property has 229.58 feet of frontage on Fir St., 273.06 feet of frontage on Old County Rd., a southerly boundary of 68.45 feet, and a westerly boundary of 198.18 feet. The property is currently the site of the St. Timothy's Episcopal Church. The parking area for the church is along the Fir St. frontage and contains 17 parking spaces.

The topography of the subject property varies, starting along the north side of Fir St. frontage is flat and then begins to drop to the south. There is a gully along the west side of Old County Rd. starting at the intersection of Fir St. and increasing rapidly in depth as the land drops toward the south. This gully essentially prevents access to the subject property from Old County Rd.

The subject property is zoned R-1-6 (Single Family Residential, 6,000 sq. ft. minimum lot size) as is the area to the north, west and south which is developed accordingly. The area to the east is zoned P/OS (Public Open Space) and is the site of Azalea City Park which is directly across Old County Rd. from the subject property.

Old County Rd. is a paved travel way within a 60 foot right-of-way with no other improvements. Fir St. is a paved travel way within a 55 foot right-of-way with no other improvements. The church currently has city water and sewer service.

PROPOSED CONDITIONAL USE PERMIT

Churches are allowed in the R-1-6 with an approved conditional use permit. Since the church building has been located on the subject property since the 1950s, which was before the city established a zoning code, it is considered to have a "de facto" conditional use permit. The existing building is configured with the chapel extending to the east from the main entrance. The applicant is requesting a minor change to the permit to expand the seating area of the chapel to accommodate the growth of the church congregation. This will be accomplished by extending the 24.5 foot wide chapel a total of 16 feet to the east for an addition of 392 sq. ft. (See Exhibit 2). The building footprint is currently 3,047.75 sq. ft. or approximately 10% of the total lot area. The addition will make the footprint 3,439.75 sq. ft. or 12% of the site.

The applicant states that the proposed expansion would allow a total of 80 seats in the chapel which is the largest gathering area. Section 92, Off-Street Parking And Loading Regulations, of the Land Development Code, requires that the church provide 1 parking space for each 4 seats, thus, in this case, 20 spaces. The church currently has 17 parking spaces and as a part of this application is proposing the addition of 9 parking spaces in the westerly portion of the church property and one space along the street at the east end of the existing parking. To accommodate the 9 spaces along the easterly property line, two of the exiting spaces will be eliminated, leaving a total of 25 parking spaces.

The easterly property line of the subject property (also the westerly right-of-way line of Old County Rd.) is at an angle to the east end of the church building. The southeast corner of the building is currently 22 feet from the property line at its closes point. The proposed expansion will place this building corner 12 feet from the property line at its closest point. Since the Land Development Code requires that churches within the residential zones have a side and rear yard setback of at least 30

feet, the applicant has requested and gained approval of a variance to allow the reduced setback (See file No. VAR-2-99).

ANALYSIS

In order to grant any conditional use, the planning commission must find that the application meets the requirements of the following criteria, which is listed in Section 140 Conditional Use Permits, of the LDC.

1. The proposal is in compliance with the Comprehensive Plan.
2. The site for the proposed use is adequate in size and shape to accommodate said use and all yards, spaces, walls and fences, parking, loading, landscaping and other features required by this code.
3. The site for the proposed use relates to streets and highways adequate in width and degree of improvement to handle the quantity and kind of vehicular traffic that would be generated by the proposed use.
4. The proposed use will have minimal adverse impact upon adjoining properties and the improvements thereon. In making this determination, the commission shall consider, but not be limited to, the proposed location of the improvements on the site, vehicular egress/ingress and internal circulation, pedestrian access, setbacks, height and bulk of buildings, walls and fences, landscaping, screening, exterior lighting and signing.
5. In areas designated as requiring preservation of historic, scenic or cultural attributes, proposed structures will be of a design complimentary to the surrounding area.

Since the first criterion includes the requirements of all of the others it will be discussed after the last four.

Criterion 2, Adequate Size And Shape. The subject lot is large enough to accommodate the proposed building expansion and additional parking. The proposed building expansion will place the building 12 feet from the easterly property line which does not meet the setback requirement of 30 feet as required by the Land Development Code, however, the church has received an approved variance for the new setback. The new parking consists of nine 9 X 20 spaces, perpendicular to the west property line with a 24 foot wide paved maneuvering area as required by Section 92. There is also a 4 foot wide strip of land between the parking spaces and the west property line. The conditions of approval will require landscaping or fencing to provide the required buffer between the church use and adjoining residential uses. There is also a four foot wide strip for landscaping along the street in this area. The expanded building will only occupy about 12% of the total site.

Criterion 3, Relation of Streets. Access to the property is from Fir St. which has a right-of-way width of 55 feet in the area adjacent to the subject property. The church building has existed on this site for many years and staff is not aware of any complaints resulting from church traffic. The proposed expansion will provide 20 additional seats which, by the parking ratio would add 5 additional cars to the traffic flow for church services. Even if the traffic increased by 10 cars, the street width is sufficient to accommodate this increase.

The existing parking, currently 17 spaces but to be reduced to 16, backs directly out into the street which is not allowed by current parking regulations. However, since this parking has been in place since before the city had a parking code, it is considered to be a "grandfathered" use. While the request for a change in the conditional use gives the Planning Commission the authority to cause the parking to be changed to meet the code, there is no usable space on the subject property to place this parking. Requiring the existing parking to meet code would effectively negate the earlier approval of the variance and make the proposed building expansion moot. Since there have been no complaints, there appears to be no reason to change the existing parking. The additional parking will meet the requirements of Section 92.

As a condition of approval, the church will be required to move the exiting sign to another location. In its current location the sign tends to block the view of cars stopped at the stop sign on Fir St., from seen cars coming from the right on Old County Rd.

Criterion 4, Neighborhood Impact. The proposed expansion will have little or no impact on the adjoining property. The location of the expansion, the landscaping and the topography of the site will make the building extension almost invisible to the neighbors. The additional parking will be buffered by either landscaping or fencing from the adjoining neighbor on the west.

Criterion 5, Historic, Scenic Or Cultural Attributes. The church itself could be considered to be a historic attribute to the area since it has been there for so long. The applicants findings state that the proposed expansion will follow the original lines of the building. Azalea Park, which is located across Old County Rd. from the subject property is a scenic attribute, however, the proposed expansion of the church building will not impact these qualities for the same reasons stated in Criterion 4, above.

Criterion 1, Compliance With Comprehensive Plan. With the approved variance the proposed expansion of the existing church building meets the requirements of the criteria addressed above and is consistent with the other applicable provisions of the Land Development Code. Although the Comprehensive Plan does not specifically address churches, allowing the proposed expansion will utilize the existing land more efficiently and will not require the church to relocate to accommodate a growing congregation.

FINDINGS

1. The applicant is requesting a minor change to what is considered to be a "de facto" conditional use permit to expand the existing chapel area by approximately 392 sq. ft. and to add a total of 8 new parking spaces on a 0.67 acre lot.
2. The subject property is zoned R-1-6 (Single Family Residential, 6,000 sq. ft. minimum lot size) and is designated as residential by the Comprehensive Plan.
3. Churches are allowed in the residential zones as a conditional use with a side and rear yard setback of 30 feet..
4. The exiting church building has been on the subject property since before the city had zoning regulations and is thus considered to have a "de facto" conditional use permit.
5. The proposed expansion will consist of extending the chapel area 16 feet to the east.

6. At its closest point the exiting building is 22 feet from the easterly property line. The proposed expansion will place the building 12 feet from the property line.
7. The applicant has requested and received a variance for the new side yard setback (File No. VAR-2-99).
8. Section 92, Off- Street Parking And Loading Regulations, of the Land Development Code, requires churches to provide one parking space for each 4 seats in the main gathering area. The church currently has 17 parking spaces.
9. The proposed building expansion will provide for a total of 80 seats which, under Section 92, would require 20 parking spaces.
10. Fir St. is a paved travel way within a right-of-way of 55 feet with no other improvements adjacent to the subject property.
11. Old County Rd. is a paved travel way with in a 60 foot right-of-way with no other improvements adjacent to the subject property.
12. Development surrounding the subject property consists of single family residential on the north, west and south. The area to the east is the Azalea City Park.

CONCLUSIONS

1. The total building footprint after the expansion will not occupy more than 12% of the total lot area. Although the original parking backs directly on to the existing street, this parking arrangement predates any city ordinance governing parking and is considered to be grand fathered. The application for a minor change to the "de facto" use permit does allow the Planning Commission to require the parking to relocated to comply with Section 92. However, although the lot is large enough to provide for the parking, the topography does not. Requiring the existing parking to meet code would effectively negate the earlier approval of the variance and make the proposed building expansion moot. Since there have been no complaints or accidents resulting from the existing arrangement, there is no reason to move the parking. The new parking area of 9 spaces meets the requirements of Section 92.

The existing building meets the setback requirements of the R-1-6 Zone except on the east side which does not meet the 30 foot set back requirement. The proposed expansion will decrease this setback even further, however, since this is the side adjacent to Azalea Park, a variance has been issued to allow a lesser setback. With the variance which was approved earlier, the subject site is adequate in size to accommodate the proposed building expansion and additional parking.

2. The proposed expansion to the chapel area of the existing church building will add capacity for approximately 20 seats. Using the seating to parking space ration of Section 92, this would equate to 5 more cars on the street before and after services. This increase is insignificant and does not impact the ability of Fir St. to handle traffic. The conditions of approval will require the relocation of the church's sign which obscures the view of cars on Fir St. trying to enter Old County Rd.

3. The proposed expansion will have little or no impact on the surrounding neighborhood. The expanded end of the building, because of existing landscaping will hardly be noticeable to the surrounding neighbors. As stated above the amount of traffic generated by the proposed expansion will not create a negative impact on the neighborhood.
4. The existing church building could be considered to be a historical attribute since it has been on the site for so long. The addition to the building will be of the same design and follow the same architectural line as the existing building. Azalea Park, located to the east, is a scenic attribute, however, the proposed addition will not detract from the parks scenic qualities.
5. With the approved variance the proposed expansion of the existing church building meets the requirements of the criteria addressed above and is consistent with the other applicable provisions of the Land Development Code. Although the Comprehensive Plan does not specifically address churches, allowing the proposed expansion will utilize the existing land more efficiently and will not require the church to relocate to accommodate a growing congregation.

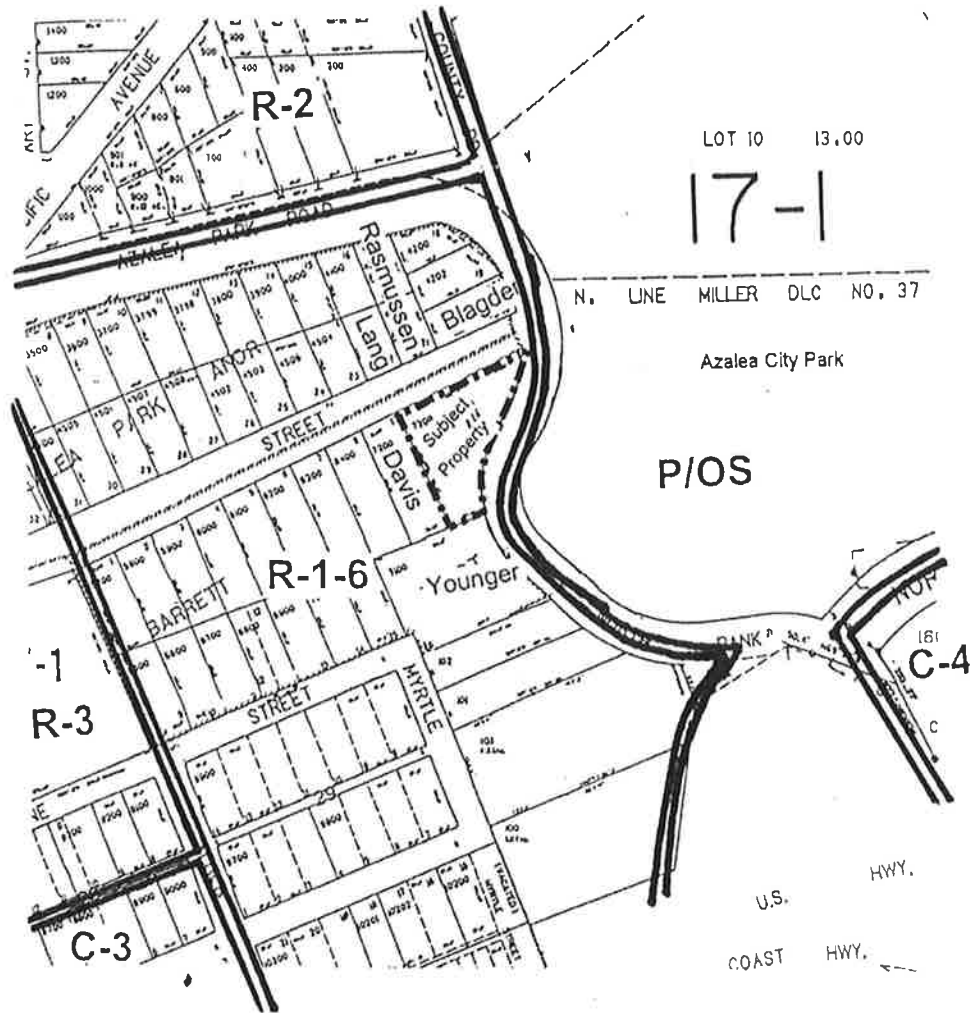
CONDITIONS OF APPROVAL

The proposed conditions of approval are attached to and made a part of this report.

RECOMMENDATION

Staff recommends **Approval** of Case File No. MC-1-99, based on the findings and conclusions stated in the staff report and subject to the conditions of approval listed above.

Staff has prepared a Final ORDER to be considered at this meeting.



APPLICANT: St. timothy's Episcopal Church

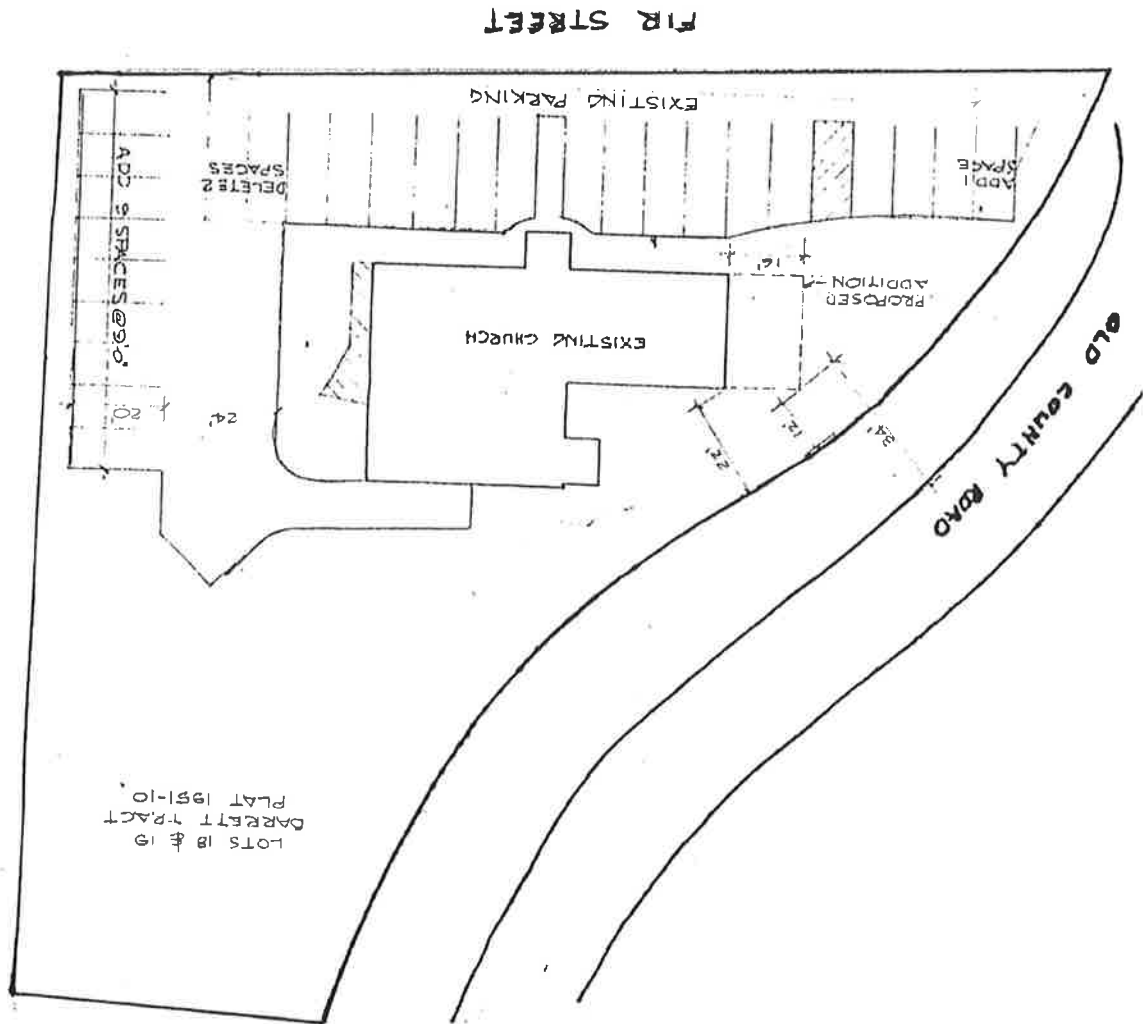
ASSESSOR'S NO: 41-13-5BC Tax Lot 7300

LOCATION: south side of Fir Street at its intersection with Old County Road

SIZE: 0.67 acre

ZONE: R-1-6 (Single-family Residential, 6,000 sq. ft. minimum lot size)





APPLICANT: St. timothy's Episcopal Church

ASSESSOR'S NO: 41-13-5BC Tax Lot 7300



LOCATION: south side of Fir Street at its intersection with Old County Road

SIZE: 0.67 acre

ZONE: R-1-6 (Single-family Residential, 6,000 sq. ft. minimum lot size)

Request for Minor Change to Conditional Use Permit
St. Timothy's Episcopal Church

Proposed improvements: To accommodate our growing congregation, we are planning to extend our nave 16 feet toward Azalea Park. Because our original church building was in existence before city zoning ordinances, we will only need a minor change to our current conditional use permit.

A. Compliance with comprehensive plan: We feel that St. Timothy's is an asset to our neighborhood and that adding onto our church conforms with the comprehensive plan.


B. Adequate space: Our building is on a double lot. There is adequate room for the addition to the nave and for the extra parking. We did have a problem with the side-yard setback closest to Old County Road, but we have obtained a variance from the planning commission.


C. Traffic: The increase in traffic will be about seven cars and will typically occur on Sunday morning when the streets are not very busy. Our addition will have a negligible impact on traffic congestion.

D. Adverse impact on adjoining properties: Because we are on a corner lot, and closest property to the new addition is Azalea Park, we will have no detrimental impact on our neighbors.

E. Preservation of scenic attributes: We are proud of the architecture of our church. Our new addition will simply extend the original lines 16 feet. It is likely that the casual observer won't notice the change to the building.

This request is submitted by Bernie Lindley with the approval of the building committee at St. Timothy's and the approval of the Rev. William Smith, Vicar.

 8/4/99
Bernie Lindley,
Building committee member


Rev. William Smith
Vicar, St. Timothy's



Land-Use Permit Application City of Brookings

898 Elk Drive Brookings OR 97415
(541) 469-2163 Ext. 237 Fax (541) 469-3650

Applicants must complete the following form to the best of their knowledge. Incomplete information may cause a delay in the review and the final decision on your request. If requested information is not known to the applicant, city staff will provide such information where appropriate.

APPLICATION FOR:

- | | | |
|--|---|--|
| <input type="checkbox"/> Minor Partition | <input type="checkbox"/> Planned Unit Development | <input type="checkbox"/> Lot Line Adjustment |
| <input type="checkbox"/> Major Partition | <input type="checkbox"/> Subdivision | <input type="checkbox"/> Annexation |
| <input type="checkbox"/> Plan Amendment | <input type="checkbox"/> Variance | <input checked="" type="checkbox"/> Minor Change |
| <input checked="" type="checkbox"/> Conditional Use Permit | <input type="checkbox"/> Vacation | <input type="checkbox"/> Sign Permit |
| <input type="checkbox"/> Appeal: Planning Com. | <input type="checkbox"/> Appeal: City Council | |

APPLICANT/OWNER INFORMATION:

Applicant St. Timothy's Episcopal Church
Mailing Address P.O. Box 1237
City Brookings State OR Zip 97415
Telephone No. 469-3314 Fax No. _____
Representative Bernie Lindley
Mailing Address 16225 Chapman Ln
City Brookings State OR Zip 97415
Telephone No. 469-0972 Fax No. _____
Owner (If not applicant) _____
Mailing Address _____
City _____ State _____ Zip _____
Telephone No. _____ Fax No. _____

PROPERTY INFORMATION:

Location 401 Fir Street (SW corner of Old County Rd & Fir St.)
Assessor's Map No. 41-13-5BC Tax Lot No. 7300
Parcel Size .67 acre Existing Zoning R-1-b
Comprehensive Plan Designation residential
Existing Use Church
Proposed Use expansion of church building
Is water service available to the site? Yes
If no, how far to nearest city water line? _____
Is sewer service available to the site? Yes
If no, how far to nearest city line? _____

REQUEST:

We need a minor change to our conditional use permit so that we can expand our existing church because it is located on a lot that is zoned R-1-b.

I hereby certify that the information provided on this application is correct to the best of my knowledge and understand that any false information may result in the rejection of the application and forfeiture of all fees submitted.

Bernie Lindley Date 8/4/99
Applicant's Signature

If applicant is not the owner of the property subject to this request please have the owner sign below or attach a letter signed by the owner authorizing to act on his/her behalf. The signature of only one owner is required, however a list of all owner's names and addresses must be submitted with application.

William A. Smith Date 8/4/99
Property Owner's Signature

File No. MC-1-99 Date Received 8/4/99 Receipt No. 11625 Received by POB

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
MEDFORD DIVISION

ST. TIMOTHY'S EPISCOPAL)	
CHURCH, by and through)	
THE DIOCESE OF OREGON,)	
dba THE EPISCOPAL DIOCESE)	
OF OREGON, an Oregon)	
nonprofit corporation,)	
and REVEREND JAMES)	
BERNARD LINDLEY, vicar of)	
St. Timothy's Episcopal)	
Church,)	
)	
Plaintiffs,)	
)	
v.)	Case Number 1:22-cv-00156-CL
)	
CITY OF BROOKINGS, an)	
Oregon municipal)	
government,)	
)	
Defendant.)	

VIDEOTAPED DEPOSITION OF REVEREND JAMES BERNARD LINDLEY
testifying in his personal capacity

and as 30(b)(6) witness

Taken in behalf of the Defendant

April 12, 2023

TAKEN VIA VIDEOCONFERENCE

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NONE MARKED

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* * *

1 Q. Okay. Does the -- has -- does it continue its
2 activities now?

3 **A. Yes.**

4 Q. Okay. And the -- who are the people on the advocacy
5 team?

6 **A. Sister Cora Rose and Machell Carroll. Those are the**
7 **paid members and then there's a volunteer, her name**
8 **is Veronica, Veronica Spalding. And then another**
9 **unpaid member would be Pastor Jim Abbott, and then**
10 **also Deacon Linda works sometimes on the advocacy**
11 **team, Deacon Linda Lee as an unpaid member of the**
12 **team.**

13 Q. And are those the same people who have been on the
14 advocacy team since it started?

15 **A. No.**

16 Q. When did the advocacy team start?

17 **A. I wish I could remember the exact year and date, you**
18 **know, the month and date -- month and year, but it**
19 **was approximately 2018.**

20 Q. And since it began in approximately 2018, have there
21 always been some paid members of the advocacy team?

22 **A. Yes.**

23 Q. And has that been Cora Rose and Machell Carroll the
24 whole time?

25 **A. It has not.**

1 for a conditional-use permit from the City?

2 **A. We had already been feeding since 2009. That**
3 **ordinance -- when that ordinance went into effect,**
4 **we'd already been feeding for how-many-ever years**
5 **that was, 12 years. I -- I -- I felt that that --**
6 **that ordinance was an unnecessary -- I want to**
7 **choose a good word here -- violation of our right to**
8 **freely practice our faith without government**
9 **interference.**

10 **Q. What other activities do you carry out at**
11 **St. Timothy's? I understand there's a legal clinic**
12 **and a health clinic?**

13 **MS. SONDAG: Objection. Vague.**

14 **BY MS. VAN METER:**

15 **Q. Go ahead and answer.**

16 **A. I don't know who -- what do you mean by "legal**
17 **clinic"?**

18 **Q. Well, you referenced a legal clinic in your sermons,**
19 **so I'm asking what the legal clinic is that you have**
20 **at St. Timothy's.**

21 **A. Okay. Did I use the phrase "legal clinic," though?**

22 **Q. Yes.**

23 **A. Okay. That's surprising to me, because I don't**
24 **think -- we have a lawyer on staff that gives legal**
25 **advice, like a legal aid --**

1 Q. Uh-huh.

2 A. -- to our -- to our community members who would not
3 be able to obtain legal -- legal services otherwise.

4 Q. Okay. So tell me about that. Who is that? How
5 often do they work? Is it out of St. Timothy's?
6 All of the same questions as we had with the other
7 programs that you have.

8 A. Okay. So it's Sister Cora, she is a member of the
9 Oregon State Bar, and she works with people who need
10 legal help, and those -- those people get referred
11 to the church by various different means, and -- and
12 she works with them to the best of her ability.

13 Q. And is she paid for that activity? Is it volunteer?

14 A. No, she's paid.

15 Q. And how many hours -- how many hours a week does she
16 get paid for this legal-service activity?

17 A. 19 or 20 hours a week.

18 Q. Is this in addition to her work for the advocacy
19 team, or is this part of -- in your mind, is this
20 part of the advocacy team work?

21 A. That is -- her role on the advocacy team is to
22 provide legal aid.

23 Q. Okay. And the legal aid she provides is 19 to 20
24 hours a week?

25 A. That's what she's paid for, yes.

1 Q. Okay. And she does this work out of St. Timothy's
2 Church building?

3 **A. Yes.**

4 Q. And what kinds of legal services is she providing?
5 Is it just referrals to other lawyers, or is she
6 also actually providing legal representation?

7 **MS. SONDAG: Objection. Calls for a legal**
8 **conclusion.**

9 **BY MS. VAN METER:**

10 Q. Go ahead and answer.

11 **A. So I -- so she does things like expungements, she**
12 **does things like help people navigate the Social**
13 **Security Administration, she helps people with --**
14 **perhaps answers questions for, like, tenant-**
15 **landlord-type issues, and then she refers -- if it's**
16 **something that she can't -- if she doesn't know the**
17 **answer, she refers them to a different organization.**

18 Q. And she's licensed with the state bar?

19 **A. She is.**

20 Q. Do you know if her license is active or like an
21 inactive pro bono status?

22 **A. It is active.**

23 Q. Does she separately -- does she work anywhere other
24 than St. Timothy's?

25 **A. Not that I'm aware of.**

1 **A. Yes.**

2 Q. And how often is that?

3 **A. Once a month.**

4 Q. And when you say "primary care provider," is it a
5 doctor or a nurse practitioner?

6 **A. Nurse practitioner.**

7 Q. And that's one full day per month?

8 **A. I -- I wouldn't say full day, no.**

9 Q. Okay. What -- what day -- is there a set schedule
10 for it?

11 **A. I think -- I think it's about 8:30 to 2:00.**

12 Q. Okay. And is there a set day per month, like first
13 Monday or anything like that?

14 **A. No.**

15 Q. Okay. Is it just based on a nurse's availability?

16 **A. The nurse practitioner's availability, yes.**

17 Q. And what is the nurse's name?

18 **A. Her name is Karla.**

19 Q. And what's the last name?

20 **A. Reinholt [sic].**

21 Q. Can you spell that for our court reporter, if you
22 know?

23 **A. Well, Karla is with a K, I can tell you that, and**
24 **Reinhart.**

25 Q. Maybe R-E-I-N-H-A-R-T?

1 **A. I'm not sure.**

2 Q. Okay.

3 **A. I call her Karla.**

4 Q. Sure. Do you also operate a day program at
5 St. Timothy's?

6 **A. I think what you're referring to is our Monday,**
7 **Wednesday, Friday office hours in the mornings from**
8 **in 9:00 to 12:00. Is that what you're referring to?**

9 Q. I don't know. There's a reference in the complaint
10 that was filed that started the lawsuit here. It
11 says, "St. Timothy's has long operated a day program
12 on Mondays, Wednesdays, and Fridays during which it
13 offers community members use of shower facilities
14 and assistance with applications for social
15 services." So what is that day program?

16 **A. Yeah, so that's 9:00 to 12:00.**

17 Q. Three days a week?

18 **A. Yes.**

19 Q. And what do you do at this day program?

20 **A. We make the showers available, we provide coffee,**
21 **access to the Internet, oftentimes our community**
22 **members charge their phones, and -- and then -- and**
23 **that's when they interact with our advocacy team.**

24 Q. Are those the set times that your advocacy team is
25 there also, or are they there additional times?

1 **A. Those are set times, and occasionally they might be**
2 **here on additional times as well, but that's not --**
3 **that's not advertised or -- that would be on a --**
4 **what would you want to call that? That would be on**
5 **an individual basis --**

6 Q. Okay.

7 **A. -- occasion.**

8 Q. Okay. The Internet access, is that just part of the
9 day program where you give -- people who come into
10 the day program have access to the Internet if they
11 have devices for it?

12 **A. So let me -- let me -- people access the Internet**
13 **when they're here, yes.**

14 Q. Okay.

15 **A. If they have a device for it, yes.**

16 Q. Okay. So do -- so you don't provide devices. Is
17 that accurate?

18 **A. If there was a reason why we needed to have someone**
19 **have access to a laptop, we would do our best to**
20 **provide that access.**

21 Q. Okay. So in the complaint, the document that
22 started the lawsuit, there's a reference to Internet
23 access. Is that -- the Internet access, is that
24 just during those days and hours of the day program,
25 or are there other times when Internet access is

1 maybe -- or maybe there would be an occasion where
2 someone would linger for 15 minutes afterwards. And
3 I'm talking about community members now. I'm not
4 talking -- I'm talking about when the doors lock.

5 Q. Sure.

6 A. And -- and then it would be Sunday from 3:00 to
7 4:00, but of course on Sunday -- the Episcopal
8 Church has a slogan that says "All are welcome," so
9 certainly if someone came to a worship service, I
10 would have no way of knowing if they were accessing
11 the Internet during the worship service.

12 Q. That was my next question, is in addition to the day
13 program hours and the mealtime hours and the meal,
14 I'm assuming there are regular services at
15 St. Timothy's?

16 A. Yeah. So Wednesday 12:00 to about 12:45, like we
17 did today, people could come in to worship with us.
18 And then Sundays from 10:00 to 11:30, people could
19 come in and worship with us. And if they -- and
20 then on Monday, you know, people -- we would be open
21 to the public for the feeding ministry on Mondays
22 from 12:00 to 1:00, and then also on Tuesdays from
23 12:00 to 1:00.

24 Q. Okay.

25 A. That -- so those are the times when the community at



City of Brookings

PUBLIC WORKS/DEVELOPMENT SERVICES DEPARTMENT
 898 Elk Drive, Brookings, OR 97415
 (541) 469-1159, Fax (541) 469-3650, TTY (800) 735-1232
abar@brookings.or.us

April 14, 2023

St. Timothy's Episcopal Church
 C/O Bernie Lindley
 401 Fir Street
 Brookings OR 97415

Re: Operating a Benevolent Meal Service without a Conditional Use Permit

Dear Mr. Lindley,

The City of Brookings is providing this letter to inform you that St. Timothy's Church, located at 401 Fir Street, Brookings, OR 97415, is operating a Benevolent Meal Service without a conditional use permit in addition to a variety of other social services, including an outreach clinic, a day program and an advocacy program in violation of 17.01.040 Compliance with code provisions in the Brookings Municipal Code (BMC). To avoid enforcement and potential civil penalties, St. Timothy's Church must cease the operation of social services that are not allowed in an R-1-6 zone, and the operation of a Benevolent Meal Service without a conditional use permit.

St. Timothy's Church operates in the R-1-6 Single-Family Residential District under a de facto conditional use permit. The BMC allows religious institutions in the Single-Family Residential District to operate a Benevolent Meal Service with a conditional use permit per BMC 17.124.050. The BMC does not allow the operation of social services in an R-1-6 Single-Family Residential District either outright or with a conditional use permit.

BMC 17.160.020 designates any violations of the Land Development Code as public nuisances that may be abated and removed under BMC 8.15.090. Failure to correct the violation could result in civil penalties of up to \$720.00 per day that the violation exists, per BMC 1.05.010.

If St. Timothy's Church does not correct the violations described above within 10 days, the City may initiate enforcement proceedings under BMC 17.160.020 and 8.15.090. To correct the violation, St. Timothy's Church must cease the operation of social services that are not allowed in an R-1-6 zone, and apply for a conditional use permit to operate a Benevolent Meal Service per BMC 17.124.050.

Please feel free to reach out if you'd like to discuss St. Timothy's options for achieving compliance with the BMC.

Sincerely,

Anthony Baron
 Public Works & Development Services Director

CC: Janell Howard – City Manager, City of Brookings

NOTICE TO ABATE

Date: 4/14/2023

TO: St. Timothy's Episcopal Church c/o Bernie Lindley
401 Fir Street
Brookings, OR 97415

Pursuant to Ordinance No. 06-O-572 of the Brookings Municipal Code, a violation exists at the following location(s) which are indicated to be in your ownership or control or you are the person causing the violation:

Street Address: 401 Fir Street	Map Number and Tax Lot: 41-13-05BC Tax Lot 7300
--	---

The nature of the violation is as follows:

BROOKINGS MUNICIPAL CODE (BMC)

17.01.040 Compliance with code provisions.

No buildings or other structures shall be constructed, improved, or altered, enlarged or moved, nor shall any use or occupancy of premises within the city be commenced or changed, nor shall any condition of or upon real property be caused or maintained, after the effective date of this code except in conformity with conditions prescribed for each of the several zones established hereunder. It shall be unlawful for any person, firm or corporation to erect, construct, establish, move into, alter, enlarge or use, or cause to be used, any building, structure, improvement or use of premises located in any zone described in this code contrary to the provisions of this code. Where this code imposes greater restrictions than those imposed or required by other rules or regulations or ordinances, the provisions of this code shall control. This code shall apply to all actions which have not reached the following steps:

- A. Site review: final approval by city staff or the planning commission;*
- B. Partitioning and subdivision: approval of preliminary (tentative) plat;*
- C. Planned unit developments: final approval by the planning commission;*
- D. Signs: final permit approval;*
- E. Variances and conditional use permits: approval by the planning commission;*
- F. Zone change: ordinance enactment. [Ord. 89-O-446 § 1.]*

St. Timothy's Church, located at 401 Fir Street, Brookings, OR 97415, is operating a Benevolent Meal Service without a conditional use permit in addition to a variety of other social services, including an outreach clinic, a day program and an advocacy program in violation of 17.01.040 Compliance with code provisions in the Brookings Municipal Code (BMC).

17.160.020 Violations.

Any building or structure set up, erected, constructed, altered, enlarged, converted, moved, or maintained contrary to the provisions of this code and any use of any land, building or premises established, conducted, operated or maintained contrary to provisions of this code shall be and the same is hereby declared a violation and a public nuisance. These public nuisances may be abated and removed pursuant to BMC 8.15.090, General abatement procedure. It is provided, however, nothing in this section requires the city to exhaust these administrative remedies prior to seeking equitable relief or damages in circuit court. [Ord. 07-O-584 § 2; Ord. 89-O-446 § 1.]

1.05.010 General penalty.

A. Violations. Every offense is a violation which may be punished by a fine up to \$720.00; provided, that where Oregon statutes impose a lesser penalty for the same offense, then the lesser penalty shall apply. Each day or part of a day for which a violation is committed or persists is a separate offense.

B. Administrative Enforcement. Where a chapter of this code provides that enforcement shall be through an administrative process, the provisions for administrative procedures shall apply rather than this section.

C. Equitable and Other Remedies Preserved. Nothing in this section prohibits the city seeking equitable relief or damages in addition to judicial or administrative enforcement of its ordinances. [Ord. 09-O-644 § 2; Ord. 07-O-592 § 2; Ord. 06-O-572 § 2.]

You are hereby directed to abate this violation by applying for a Conditional Use Permit within ten (10) days from the date of receipt of this notice. Failure to abate the violation may warrant issuance of a citation and imposition of a civil penalty of up to \$720.00. Each day's violation constitutes a separate offense. In addition, the City may abate the violation and the cost of the abatement will be charged to you.

You may dispute the existence of a violation and request a hearing by giving a written statement to the City Manager at 898 Elk Drive, Brookings, OR 97415 within ten (10) days from the date of receipt of this notice.

An error in the name or address of the person responsible shall not make this notice void, and in such case the posted notice shall be considered to be sufficient notice.

If you have any questions, please call 541-469-1159.



**Anthony Baron,
Public Work & Development Services Director**

April 24, 2023

VIA EMAIL AT LZIEMER@BROOKINGS.OR.US
WITH A COPY TO JANELL HOWARD,
JHOWARD@BROOKINGS.OR.US

Planning Commission
Attn: Lauri Ziemer
City of Brookings
898 Elk Drive,
Brookings, OR 97415

**Re: Request for Appeal of Notice to Abate issued to St. Timothy's Episcopal Church
April 14, 2023.**

Dear Planning Commission Members:

This office represents St. Timothy's Episcopal Church ("St. Tim's") in the above referenced matter. St Tim's operates a church use ("Church") at the subject property at 401 Fir Street ("Property"). St. Tim's received a Notice to Abate issued by the City of Brookings (the "City") on April 14, 2023, directing the Church to file a conditional use permit application to abate the Benevolent Meal Service violation and stop providing "a variety of other social services" (the "Notice"). **On behalf of St. Tim's, we seek a public hearing to obtain an interpretation of the Brookings Municipal Code ("BMC" or "Code") regarding the alleged violation from the Planning Commission.¹**

Relief Requested

St. Tim's requests the following relief from the Planning Commission:

Determine that St. Tim's activities at the Property described as "social services" in the Notice do not violate BMC for one or both of the following reasons:

- (1) The activities described as "social services" in the Notice are typical functions conducted by Churches and Schools and are considered part of a Church or School use where they occur. As applied here, the "social services" uses at St. Tim's Church are properly classified as part of its Church use rather than a separate, stand-alone use.

¹ The City has agreed to extend the deadline for submitting objections to the Notice of Abatement as it relates to St. Tim's provision of meal services. St. Tim's reserve its rights to submit such objections at the appropriate time, if needed.

(2) The activities described as “social services” in the Notice are part of St. Tim’s legal non-conforming use of the Property and are allowed to continue.

Authority for Planning Commission Review

Pursuant to BMC 8.15.090.D.3, when a responsible party receives a notice of abatement “where the potential violation is a matter of ambiguity,” related to BMC Title 17, “the code enforcement officer determination of violation may be appealed to the planning commission pursuant to Chapter 17.156 BMC.”² The BMC does not require the recipient of a notice of abatement to first pursue review by the City Manager in BMC Title 17 cases before seeking Planning Commission Review. The Notice is a code enforcement officer determination and raises a matter of ambiguity because the Code does not define the terms social services, outreach clinic, day program, or advocacy program, and does not classify these activities as within a particular use category. These uses are typically conducted as facets of other listed uses (such as churches and schools) and should be classified as a part of those uses when they occur. Furthermore, “social services” have been an integral part of the Church use since it began operating in the 1940’s. The Notice does not account for the legal nonconforming use status of the Church.

The Planning Commission has the power to hear and decide appeals from administrative interpretations. BMC 17.156.010. When declaring the meaning and intent of the BMC, the Planning Commission interprets provisions to carry out efficient designation and classification of property, buildings, and land development. *Id.* In addition, it interprets provisions to carry out “the expressed purpose of the zoning district involved.” *Id.*

Legal Argument

A. “Social Services,” including outreach programs, day programs, and advocacy programs, are typical functions conducted by Churches and Schools and are properly considered part of a Church or School use where they occur.

BMC 17.01.040 requires that all uses and activities comply with the relevant aspects of the BMC (but, as noted below, exempts legal nonconforming uses from land use regulations). The Notice states that St. Tim’s is providing a variety of other “social services, including an outreach clinic, a day program and an advocacy program in violation of 17.01.040 BMC.” The BMC does not define “social services,” outreach clinic, day programs or advocacy programs or define these activities as uses allowed or disallowed within any zoning district. In addition, there is no defined term in the BMC that “social services” could fit into.³

² To ensure the Church preserves its rights to object to the Notice, the Church is simultaneously filing an Objection under BMC 8.15.090.D.3 with the City Manager.

³ For example, the Code defines “club” as “an association of persons (whether or not incorporated), religious or otherwise, for a common purpose, but not groups organized primarily to render a service carried as a business for profit.” BMC 17.08.030. While churches may be considered a club under this definition, the BMC

The Notice also concludes that there is no option for St. Tim's to apply for a conditional use permit to allow these "social services" at the Property. The City seems to reach this result by concluding that, if a use is not specifically listed within the allowed or conditional uses under a certain zoning district, that the use is prohibited and could not be included as part of a listed use. Since "social services," "outreach clinic," "day program" and "advocacy program" are not uses specifically listed as allowed or conditional within *any* zoning district in the City, the City appears to conclude that these activities are prohibited City-wide even when they are provided as an integral part of an allowed or conditional use.

From the Notice, we glean that the City's conception of "social services" includes any service provided to the needy, including provision of food, advice or referrals, and inviting those in need to an establishment for advice or to have fellowship with others.

The BMC does not define "church" or provide any information regarding the characteristics of this use, but does list "churches" as a use allowed conditionally within the R-1-6 zone. A dictionary definition of "church" is "a building for Christian religious activities." It is reasonable to rely on this dictionary definition since "church" is not defined in the BMC.

"Social services," including outreach programs, day programs, and advocacy programs, are Christian religious activities and typically considered church functions where they occur as part of a church use.⁴ In fact, the "social services" the City seems to be concerned about have long been typical parts of church use. Alms—the giving of money and food to the hungry—dates to biblical times. *See* Deuteronomy 15:8 ("but you shall freely open your hand to him and shall generously lend him sufficient for his need in whatever he lacks"); Proverbs 19:17 ("one who is

does not further clarify the types of activities that would constitute "social services." The Code defines "clinic" as a medical service use, which we do not believe the City intended to refer to by listing "outreach clinic."

⁴ *See*, Jackie Rehwald, *New Church in North Springfield Partners with Gathering Friends to Serve Poor, Homeless* (July 21, 2019), <https://www.news-leader.com/story/news/local/ozarks/2019/07/21/new-church-north-springfield-focuses-those-poverty-homeless/1760513001/> (Church in Springfield working to serve the "practical needs" of the poor and homeless including lowering barriers to food and clothing, "offering a safe place for foster kids and their biological parents to visit with each other, serving dinner and fellowship to those living in the neighborhood and creating a welcoming place for homeless folks who might need a drink of water or to rest on a couch for a little while"); Nancy West-Brake, *Local Church Seeks Donations for Coat Drive* (Dec. 3, 2012); Neighborhood Christian Legal Clinic, *Home*, <https://www.nclegalclinic.org/> (last visited Apr. 23, 2023) (providing legal services from the Trinity Outreach Center); Catholic Charities, *Catholic Charity assistance near you.*, https://www.needhelppayingbills.com/html/catholic_charities_financial_a.html (last visited Apr. 23, 2023) (list of nationwide network of churches that provide emergency housing, financial assistance, clothing, rental assistance, medical needs, free holiday assistance, counselling, immigration programs, and employment services); Fame Church LA, *FAME Legal Clinic*, <https://www.famechurchla.org/free-legal-clinic/> (last visited Apr. 23, 2023); *Madison Avenue Christian Church Continues Its Community Ministry During Crisis, Including Meals*, Northern Kentucky Tribune (Apr. 7, 2020), <https://www.nkytribune.com/2020/04/madison-avenue-christian-church-continues-its-community-ministry-during-crisis-including-meals/>.

gracious to a poor man lends to the lord and he will repay him for his good deed”). Many churches in Brookings participate in these same activities as part of their church use.⁵

Other conditional uses in residential zones, such as schools, often provide social services, including outreach programs, day programs, and advocacy programs and these activities are considered part of the school use when they occur.⁶ For example, the Brookings-Harbor School district opened the Coast Community Health Center in November 2022, which seeks to provide health care to all students who need it free of cost, including well child checks, immunizations, follow-up visits and more.⁷

Typical elements of a use should be treated as part of that use for purposes of BMC regulations even when each detail of the use is not specified by the BMC to avoid unreasonable results. This is especially true when the BMC does not provide a definition of a use or any guidance on the characteristics of that use. Typical elements of a church include providing service to the needy, including providing advice or referrals, and inviting those in need to an establishment for advice or to have fellowship with others. We urge the Planning Commission to determine that the “social service” related activities occurring at St. Tim’s listed in the Notice are part of its church use, which is authorized at the Property.

B. St. Tim’s Operation of the Church at the Property is a Legal Nonconforming Use Which Includes “Social Services.”

1. The Church is a legal nonconforming use because it predates the 1989 Land Development Code.

The Notice alleges that St. Tim’s is violating BMC 17.01.040, because the Church conducts “a variety of other social services, including Outreach Clinic, Day Program, and Advocacy Program.” From the wording of the Notice, it appears the City intended this to be a non-exclusive list and is alleging that any “social service” use, which is not defined by the Code is prohibited at the Property.

BMC 17.01.040 only applies to buildings, structures, use and occupancy *established after the effective date of the Code*. If a building’s use was in place before the Code was enacted, then those provisions do not apply because it is a nonconforming use. BMC 17.01.030. BMC 17.120 governs nonconforming uses and allows nonconforming uses to continue, subject to that section’s regulations.

⁵ Brookings Nazarene, *Community Care*, <https://www.brookingsnaz.org/community-care> (last visited Apr. 21, 2023); Trinity Lutheran Church, *Outreach*, <https://tlcbrookings.org/outreach> (last visited Apr. 21, 2023)

⁶ See also, Beaverton School District, *Clothes for Kids*, <https://www.beaverton.k12.or.us/departments/communications-community-involvement/volunteer/clothes-for-kids> (last visited Apr. 23, 2023); Mills Street Elementary, *Counseling*, <https://www.lisd.net/Page/16818> (Apr. 23, 2023);

⁷ *School Based Health Center – Coast Community Health*, Brookings-Harbor School District, <https://www.brookings.k12.or.us/apps/pages/sbhc> (last visited Apr. 21, 2023); Reynolds High School, *College and Career Center*, <https://www.reynolds.k12.or.us/rhs/college-and-career-center-0> (last visited Apr. 23, 2023).

As the Notice seems to admit (stating that St. Tim's "operates under a de facto conditional use permit"), St. Tim's has existed at 401 Fir Street for more than 30 years before the Land Development Code was adopted in 1989, and is a legal nonconforming use governed under BMC 17.120.

The BMC defines "use" as the "purpose for which land and/or a structure is designed, arranged, or intended, or for which it is occupied or maintained." BMC 17.08.210. The "use" of the Church at the Property therefore includes the entirety of the operations occurring at the Property. Even if some elements of the Church use would not be allowed under the current BMC, which St. Tim's disputes, the nonconforming use protections apply to all of the Church operations that predate the Code, including any "social services" conducted as part of the Church operations, so long as those uses have been maintained over time. St. Tim's has continuously conducted "social services," as the City appears to envision that term, since its establishment and has the right to continue these uses under BMC 17.120.

2. The Church's legal nonconforming use includes "social services," including an outreach program, day program and advocacy program.

As we discuss above, the Code does not define "social services," "outreach clinic," "day program," or "advocacy program." The Notice also seems to require St. Tim's to cease its conduct of "a variety of other social services" which are not specified. From the Notice, we glean that the City's conception of "social services" includes any service provided to the needy, including provision of food, advice or referrals, and inviting those in need to an establishment for advice or to have fellowship with others.

Since its establishment at the Property, St. Tim's has offered services or alms to the needy in furtherance of Christian beliefs to feed the hungry, respect the dignity of every human being, and build community. St. Tim's use of the Property as a Church within the Episcopalian faith *necessarily* includes elements of service to the poor. These elements include opening the Church as a sanctuary for prayer, providing advice on a variety of topics, providing opportunities for fellowship with others, and providing information to the community. These core religious functions, in some form, have continuously been part of the Church use at the Property since its inception and have not ceased for any two-year period. Therefore, the Church maintains the legal right to continue these uses as part of its Church operations. BMC 17.120.

Thank you for your review of these important issues.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Allison J. Reynolds', written in a cursive style.

Allison J. Reynolds

Supplemental Planning Commission Packet I

June 27, 2023

7pm – Council Chambers

Page #	From:	Description:
File No. APP-1-23		
1-128	Allison Reynolds	Legal Argument in Support of St. Timothy's Church Appeal
129	Rev Cindra Gray	Letter of Support of St. Timothy's Church Appeal
130	Dr. Elli Kimbauer	Letter of Support of St. Timothy's Church Appeal
131	Kathleen Dickson	Letter of Support of St. Timothy's Church Appeal
132	Rev Dana Gill	Letter of Support of St. Timothy's Church Appeal
133	Rev Diana D Akiyama	Letter of Support of St. Timothy's Church Appeal
135	Patricia Black	Letter of Support of St. Timothy's Church Appeal
136	Elizabeth Klein	Letter of Support of St. Timothy's Church Appeal
136	Abby Ryan	Letter of Support of St. Timothy's Church Appeal
137	Michael Tompkins	Letter of Support of St. Timothy's Church Appeal
139	Shelley Denison	Letter of Support of St. Timothy's Church Appeal
141	Rebeca Malmgren	Letter of Support of St. Timothy's Church Appeal
143	Int Pastor Emily Ronsberg	Letter of Support of St. Timothy's Church Appeal
144	Pastor Jon Myers	Letter of Support of St. Timothy's Church Appeal
145	Sister Noreen Stevens	Letter of Support of St. Timothy's Church Appeal
147	Linda Strine	Letter of Support of St. Timothy's Church Appeal
148	Tabreena Rogers	Letter of Support of St. Timothy's Church Appeal

June 27, 2023

VIA EMAIL

Planning Commission
Attn: Lauri Ziemer
City of Brookings
898 Elk Drive,
Brookings, OR 97415

Re: Legal Argument in Support of St. Timothy's Church Appeal of the April 14, 2023, Notice to Abate.

Dear Planning Commission Members:

This office represents St. Timothy's Episcopal Church ("St. Tim's") in the above referenced matter. St Tim's operates a church use ("Church") at the subject property at 401 Fir Street ("Property"). St. Tim's received a Notice to Abate issued by the City of Brookings (the "City") on April 14, 2023, directing the Church to file a conditional use permit application to abate the Benevolent Meal Service violation and stop providing "a variety of other social services" (the "Notice"). Prior to the request for an appeal, the City agreed to stay the benevolent meal service violation because of the ongoing federal litigation regarding the City's Benevolent Meal Service ordinance. **The staff report contains several factual mischaracterizations which we correct in this submission. This letter also provides further support that St. Tim's activities at the Property, (referred to as the "social services" in the Notice), are a typical church use and do not violate the Brookings's Municipal Code ("BMC").**

I. DISCUSSION

A. Clarification of the activities occurring at St. Tim's Church.

The facts cited by the Staff Report supporting the staff recommendation to deny the appeal and continue the City's enforcement actions against St. Tim's misstate or misconstrue the

current activities at the Property. It important to correct the record of the Church's activities, since the City is threatening enforcement action based on what appear to be incorrect assumptions.

Attached as exhibits A & B to this letter are Letters from Father Bernard Lindley ("Fr Bernie") and Sister Cora Rose ("Sister Cora"). As explained in the letters from Fr Bernie and Sister Cora, the following activities that the City appears to classify as "social services" and which appear to be the subject of the Notice are ongoing at the Church:

- "Advocacy clinic" and "legal clinic": The "advocacy clinic" and "legal clinic" are a time when the Church opens its doors for visitors to receive spiritual advice from Fr. Bernie, Deacon Linda and Sister Cora. This guidance includes assisting people in navigating processes like obtaining birth certificates and identification cards, enrolling in health insurance, connecting to therapy and treatment, and applying for jobs and housing, and referrals to service providers. As stated by Sister Cora, the "legal clinic," is part of the "advocacy program, but is focused on either assisting with or providing for referrals for legal issues . These activities coincide with the "day program" and occur within the same time period: Monday, Wednesday and Friday from 9am to noon. St. Tim's also occasionally refers to this period of time when the Church is open (Monday, Wednesday, and Friday from 9 AM to noon) as office hours.
- "Day program": The "day program" consists of the Church opening its doors from 9am to noon on Monday, Wednesday, and Friday to allow people to enter the Church building use shower facilities, participate in fellowship with others, rest, and access the advocacy and legal clinic which are a part of what goes on in the Church during the day program.
- Attendance: Approximately 20-30 people total (including those seeking advocacy and legal assistance) visit the Church during the day program hours.
- Staffing: The Church has several paid staff (all part time) that are involved in the various activities at the Church including the services on Sundays and the day program (and its components). The paid staff involved with the advocacy program are Fr Bernie, Sister Cora, and Machell Carroll. In addition, St. Tim's has two part-time Deacons, who primarily are involved with church services on Sundays, but sometimes volunteer in the day program and advocacy clinic. As is common at any church, parishioners also volunteer their time to provide ministry. During the day program hours there are typically 5 paid staff or volunteers present at the Church providing ministry in one way or another.

Several statements in the Notice and Staff Report seem to contradict these facts and are inaccurate as follows:

- The Staff Report states that “the City has also become aware of information suggesting that the number of people served by the Church’s social services activities exceeds the number of church parishioners,”¹ but does not provide evidence to support this conclusion. Father Bernie’s letter clarifies that the Church welcomes around 45 people to its Sunday services, while seeing up to 30 people during its office hours (M, W, F from 9:00-12:00).
- The staff report inserts *select* portions of the deposition of Father Bernie in the federal litigation that overstate the activities occurring at the church. The staff report states that “the Church operates a “legal” clinic for 19-20 hours per week. As the letter from Sister Cora indicates, she only meets with “clients” during office hours which occur during the day program. People are not coming and going from the church to visit the legal clinic for 19-20 hours per week.
- The staff report misstates that the Church has 6-7 paid employees “for these activities,” referring to the “social services.” Father Bernie and the Deacons are paid as members of the clergy, not just for advocacy. In addition, there are only two other paid employees, Sister Cora and Machell Carroll that are associated with the administering of alms during office hours, but they too have additional voluntary roles at the Church beyond assistance with the day program.
- The Notice indicates that an “outreach clinic” is occurring and the Staff Report states that weekly HIV testing occurs at the Church. These activities are no longer occurring at the Church.

B. St. Tim’s Has Provided Sufficient Evidence that “social services,” including the particular social services at issue are a typical church use.

The Staff Report concedes that the BMC does not provide a definition of “church” use or otherwise explain what types of activities this use includes. Thus, what constitutes a “church” is a matter of interpretation. Staff advocates for using the dictionary definition of church as a “building for public and especially Christian worship.” We do not necessarily disagree with that definition, since “worship” is a broad term that encompasses many activities (for example, Black’s Law Dictionary defines public worship as “[w]orship conducted by a religious society according to the society’s system of ecclesiastical authority, ritual propriety, and rules and regulations.”)² and the leaders of St. Tim’s and other congregations regularly refer to their service of the poor as “worship.” However, Staff chooses to narrowly define “worship” as including only sermons held for the public at a church service (typically on Sundays). This

¹ Staff report at 12.

² *Worship*, BLACK’S LAW DICTIONARY (11th ed. 2019).

narrow definition is not consistent with the activities churches typically engage in and is not a reasonable reading of the BMC.

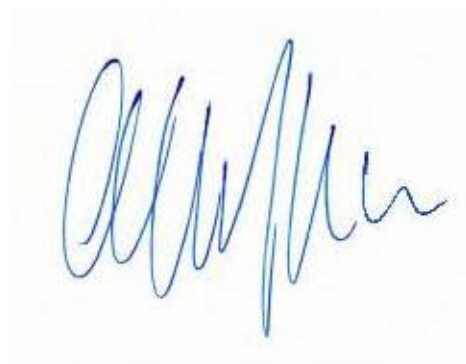
“Church” use should be defined as encompassing both sermons and the typical activities churches engage in during the week as part of their ministry. Service ministries are a key tenant of the Christian faith and churches regularly engage in serving the poor. The Staff Report states that St. Timothy’s has not provided sufficient evidence of the fact that services for the poor are a typical church use. Several members and leaders of nearby churches have submitted letters to the record regarding their service ministries and their experience with churches as people of faith and leaders who have devoted their lives to ministry. In addition to this testimony from religious experts, we have attached the following evidence of church service activities. These activities, many of which are occurring in residential zones in Brookings, are examples of church service to the poor. The types of service ministry St. Tim’s engages in (as clarified above) are typical church functions and must be included in the City’s interpretation of “church” use.

- **Clarification of St. Tim’s use, history and service as part of church use**
 - Letter from Reverend Bernard Lindley
 - Letter from Sister Cora Rose
- **A day program that provides showers, internet and weekly HIV/HEP-C screening is a typical church use:**
 - Jackie Rehwald, *New Church in North Springfield Partners with Gathering Friends to Serve Poor, Homeless* (July 21, 2019), <https://www.news-leader.com/story/news/local/ozarks/2019/07/21/new-church-north-springfield-focuses-those-poverty-homeless/1760513001/>;
 - [The Connecting Grounds, Get Involved](https://www.theconnectinggrounds.com/getinvolved), <https://www.theconnectinggrounds.com/getinvolved> (last visited June 16, 2023).
- **A legal clinic is a typical church use:**
 - Neighborhood Christian Legal Clinic, *Home*, <https://www.nclegalclinic.org/> (last visited Apr. 23, 2023)
 - Fame Church LA, *FAME Legal Clinic*, <https://www.famechurchla.org/free-legal-clinic/> (last visited Apr. 23, 2023)
 - Catholic Charities of Oregon, *Immigration Legal Services*, <https://www.catholiccharitiesoregon.org/services/immigration-legal-services/> (last visited June 16, 2023)
- **An advocacy team/caseworker assistance is a typical church use:**
 - Brookings Nazarene, *Community Care*, <https://www.brookingsnaz.org/community-care> (last visited Apr. 21, 2023)

- Catholic Charities of Oregon, *Services*,
<https://www.catholiccharitiesoregon.org/services/> (last visited June 16, 2023)³

Thank you for your time and consideration.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Allison J. Reynolds", is centered on the page. The signature is fluid and cursive, with the first name "Allison" being more prominent than the last name "Reynolds".

Allison J. Reynolds

³ In our request for appeal, we included a variety of sources that showed other church activities that could be considered social services but were allowed. We have not listed those articles here, but still attached them to our submission.

EXHIBIT A

June 27, 2023

Via Email

Planning Commission
Attn: Lauri Ziemer
City of Brookings
898 Elk Drive
Brookings, OR 97415

**Re: Evidence in Support of St. Timothy's Episcopal Church Appeal of April 14, 2023
Notice to Abate.**

Dear Planning Commission Members:

I am the Reverend Bernie Lindley, the vicar of St. Timothy's Episcopal Church here in Brookings. This letter is my response to the Notice to Abate issued to St. Timothy's Church to stop providing "social services" to the community and the statements and conclusions contained in the Staff Report published on June 15, 2023. I grew up in Brookings, Oregon, was baptized at St. Timothy's in 1973, and was a parishioner until leaving for college in the fall of 1985. I returned to my hometown in 1990 and became the vicar in 2008. I have served as vicar since then.

I was dismayed to receive the Notice to Abate that, for the first time, ordered our Church to stop providing "social services," which the City Code does not define, but City Staff appear to believe includes typical activities at our Church and other churches and that are a key tenet of our religious practice. We knew the City had concerns about our meal program (which we are working through separately and is not the subject of this appeal) but were surprised to learn that the City apparently believes that our other activities beyond services on Sundays are not allowed and could never be allowed as part of a church use. This is especially concerning since these activities have been going on for decades without us receiving any notice that there was a problem—including in 1999, when the Church received a modification to its de facto Conditional Use Permit after a public hearing that allowed us to expand. The City and County regularly connect needy citizens to our Church for assistance and fellowship, including as recently as the weekend of June 18, 2023. The Notice to Abate does not identify any operational problems like traffic or noise that our activities are causing. It simply decides to restrict our religious practice based on undefined terms in the City Code.

No one should want the City to dictate how a church and its members worship and I urge you to consider the disturbing precedent this enforcement creates for the community and grant our appeal.

The Staff Report states that we have not provided enough evidence of how "social services" are part of a church's function or of the activities that have long been ongoing at St.

Timothy's. This letter provides that additional information based on my knowledge as a parishioner and vicar at the Church.

Clarification of Activities Actually Occurring at the Church

All the vicars who preceded me at St. Timothy's from the time I began attending as a child distributed alms to the needy in the Brookings community. I continued to distribute alms after I became vicar. For at least the last 30 years, our church office has been open Monday, Wednesday, and Friday, from 9:00 a.m. to noon. During that time, we have always been available for counseling, almsgiving, and spiritual care to the community at large. Our current almsgiving program includes the following elements (in addition to the meal service which is not part of this appeal):

- A "day program" staffed by two church employees, Machell Carroll and Sister Cora Rose, as well as approximately 2-3 volunteers per day. These volunteers sometimes include our two part-time clergy. The team helps me distribute alms, which is difficult to manage as a part-time vicar. (I am paid for 12 hours of work per week as vicar.) This day program includes the "advocacy program" cited in the City's notice and these activities all take place during the Monday, Wednesday and Friday 9:00 a.m. to noon timeframe during the Church's open hours. During this time, St. Timothy's opens its doors for community members to pray, drink coffee, use the Church's internet, charge their phones, use the Church's two showers, obtain laundry vouchers (we have no laundry machines).
- On Mondays, Wednesdays, and Fridays from 9:00 a.m. to noon during the day program, usually about five people, including Sister Cora Rose, Machell Carroll, and some volunteers, offer assistance to visitors trying to navigate processes like obtaining birth certificates and identification cards, enrolling in health insurance, connecting to therapy and treatment, and applying for jobs and housing and provide referrals to service providers. Additionally, Sister Cora Rose is a licensed attorney who offers counseling and advice to individuals who show up at the Church during our Monday, Wednesday and Friday open hours with questions about issues such as citations, court fines, records expungement, SSI, food stamp benefits and who need referrals to attorneys with various skills. These activities of almsgiving are referred to as the "Advocacy Program."
- The "Outreach Program" activities, were established during the COVID-19 pandemic to give people vaccines and are no longer occurring at the Church.

On any of the days we are open for the day program, there are between 20-30 total people who come for us to serve in the name of Jesus Christ. As further detailed below, the visits are typically staggered and commonly 15 to 20 people visit the Church building to receive services at any one time during these Monday, Wednesday and Friday morning open hours.

Most of the unhoused people whom we serve arrive by foot or on a bicycle. Some of them live in their cars and park in our parking lot while they are in the building. Our staff, volunteers, and community partners also use some of the parking spaces when they provide alms during the day program. However, my observation is that there are always empty parking spaces except when there is an event across the street in Azalea Park. We do not allow overnight camping on our property. As the Commission knows, St. Timothy's is enrolled in the Property Watch program pursuant to which the Brookings police can cite individuals for trespass when they find someone on our property after 6:00 p.m.

Because the people whom we serve are not all in the building at once, arriving at various times while we are open, it never gets to the point where the building feels crowded. Generally, there are about 20-25 people (including staff and volunteers) in the building at once and when the weather is good a few outside on the picnic tables or in the smoking area. People who visit during office hours generally stay for a little over an hour. This is significantly less than the number of people who attend Sunday service, which can have as many as 45 people present. In all of our worship activities, there is an atmosphere of congeniality and gratitude that I find invigorating. Even though I am only paid to be a quarter-time priest, I gladly put in triple and quadruple the hours that the congregation expects of me.

The church activities identified in the Staff Report are fundamental to the faith of Episcopalians, St. Timothy's, and me specifically.

The services that we provide are central to our deeply held religious beliefs. Respecting the dignity of every human being and building community are necessary acts during our time on Earth. Every three years, deputies (delegates) and bishops from each Episcopal Diocese meet in a General Convention, which serves as the Episcopal Church's governing body. I was a delegate to the General Convention in 2018. Among other things, the General Convention has the authority to adopt resolutions that reflect a consensus about how the faith body feels about certain issues. I feel compelled to act in conformance with our resolutions.

Because of how central giving alms is to the Episcopal faith, Canon 9, section 6 of the Episcopal Church requires the priest in charge of a congregation to distribute Alms and Contributions to "such pious and charitable uses as the Rector or Priest-in-Charge shall determine." The feeding ministry and all other ministries offered at St. Timothy's—including the advocacy program, day program, and until recently, the outreach clinic—are not adjacent to our faith. They are themselves acts of worship and part of St. Timothy's function as a church.

These activities are common to religious practice and the types of services a "church" would provide. For example, as explained in the Book of James:

What good is it . . . if someone says he has faith but does not have works? Can that faith save him? If a brother or sister is poorly clothed and lacking in daily food, and one of you says to them, "Go in peace, be warmed and filled," without giving them the

things needed for the body, what good is that? So also faith by itself, if it does not have works, is dead. (James 2:14-17.)

Similarly in the Book of Common Prayer, Baptismal Covenant, it is noted that faith demands “striv[ing] for peace and justice among all people, and to respect the dignity of every human being.”

In addition, even the City has worked with St. Timothy’s to provide these services. It is important to me that St. Timothy’s be a good neighbor to everyone. We consistently cooperate with Brookings police. Indeed, on several occasions, the police have referred people in need with nowhere else to go at the Church for fellowship, counseling and advice. In fact, St. Timothy’s now invites a variety of community stakeholders to its weekly staff meetings. The Brookings community resource officer, who is part of the Brookings police department, regularly attends, as do representatives of community care organizations (CCOs), Adapt, Coast Community Health, and Oregon Department of Human Services officials. The goal is to ensure that city officers are aware of our faith activities as a resource for those in the community. The community resource officer often spends time at the day program interacting with the individuals we serve.

The vicars of St. Timothy’s have administered these “social services” or, as we call them, “alms” to the community since prior to 1989.

St. Timothy’s Episcopal Church has always, since its very inception, given alms to the needy. In the 1980s, the alms focused on programs to provide rent and utilities assistance for people in the community going through difficult financial times.

In the 1990s, the alms concerned providing rent and utilities assistance, as well as gasoline and bus tickets if needed. In 1997, when I got re-involved with the congregation, the Church was administering alms mostly through Fr. Bill, the vicar at the time. The City was certainly aware of Church activities during this time because Fr. Bill served on City committees. In 1999, the Church building was expanded through a modification to the de facto Conditional Use Permit which included a public hearing process. The City’s decision found that the activities at the Church at that time complied with the Conditional Use criteria. The activities occurring at the church at that time appear to be identical to the activities cited in the Notice of Abatement. The City has not explained why the same activities are now impermissible and is interfering with our long-standing religious practice.

In the 2000s, we saw a shift in what was needed by visitors during our day program. The biggest amount of our almsgiving continues to be for rent and utilities, but our visitors began to need shoes, coats, hygiene items, and assistance with paying for car repairs so the focus of our program shifted to ensure we were providing assistance in the way it was most needed. During my time as vicar, I have continued administering alms through the programs described above and as there was a need in the community.

We do these things because our faith tradition teaches that all people are created in the image of God and deserve to be treated with dignity and respect. As followers of Jesus Christ, we believe that whatever we do for the poor and downtrodden, we do for Jesus Christ himself. If our Church fails to respond to the needs of someone in distress, then we fail to reflect God's love in the world. Our church continues its long-time tradition of also giving through service and advice for the less fortunate through our open hours three days per week.

Thank you for your time.

Best regards,

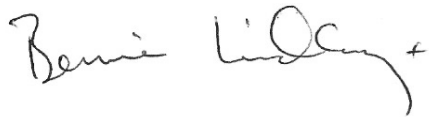
A handwritten signature in cursive script that reads "Bernie Lindberg". The signature is written in dark ink and includes a small cross-like mark at the end of the last name.

EXHIBIT B

June 27, 2023

Via Email

Planning Commission
Attn: Lauri Ziemer
City of Brookings
898 Elk Drive
Brookings, OR 97415

**Re: Evidence in Support of St. Timothy's Episcopal Church Appeal of April 14, 2023
Notice to Abate.**

Dear Planning Commission Members:

I am Rev. Sister Cora Rose, the ordained Evangelical Lutheran Church in America (ELCA) Minister of Word and Service (deacon). I am under call by the Oregon Synod of the ELCA to legal aid ministry of poverty alleviation at St. Timothy's. The ELCA and Episcopal Church are in full communion, meaning they share clergy, a common faith, and mission/ministry in the world together. This letter is my response to the Notice to Abate issued to St. Timothy's Episcopal Church (St. Timothy's or the Church) to stop providing "social services" to the community and the statements and conclusions contained in the Staff Report published June 15, 2023. I grew up in Brookings, Oregon and attended summer Vacation Bible School at St. Timothy's and as a teen completed my volunteer hours for the rite of Affirmation of Baptism (Confirmation) at the Brookings Food Bank, which was then located within St. Timothy's. I continued to visit St. Timothy's for weekday worship while in college and graduate school, when home on school breaks. I became a part-time staff member of St. Timothy's in 2022 and have served as the ELCA deacon on the Advocacy Team since then.

For years, the Church has operated without question from the City of Brookings. I was surprised when the City issued a Notice to Abate. That was the first time I had heard of the Church's regular ministry activities being classified as "social services," a term that is not in the Brookings City Code. Then after the Staff Report was released, it was surprising to hear that City Staff appears to believe that a church welcoming community members during the day is not a typical "church use." While we knew the City had concerns about our meal program, I was shocked when "church" was defined to exclude any activities beyond services on Sunday and that St. Tim's longstanding faith practices were not being considered a church use—especially since these activities have been going on since the Church opened; it has always opened its doors to people during the day.

The Staff Report mischaracterizes the activity occurring on St. Timothy's property and states that we have not provided enough evidence of how "social services" are a "typical" church use. This letter provides clarification of facts that form the basis of the Staff Report and provide the requested additional information based on my knowledge as regular attender and member of the Advocacy ministry at the Church.

Existing Church Activity:

Every Monday, Wednesday, and Friday the church has Office Hours for a 3-hour period from nine am to noon. This is sometimes called the “day program.” The number of people who visit the Church during the day are fewer than the number of meals served at the kitchen. When the Church opens its doors for people to visit, rest, seek advice, take showers, receive spiritual guidance from Fr. Bernie or Deacon Linda, to pray alone or with church ministry staff or volunteers, or meet with the advocacy team or me, there is usually a slow but steady stream of people in and out of the building. Generally, less than 15 people show up during office hours period to take showers. In addition, usually around 4-8 people participate in the advocacy program, including the legal advocacy ministry. I usually meet with 2-3 people seeking legal advice; others speak with our volunteers about other needs. Simply put, these activities are no different than parishioners coming to the Church during the week for counseling, to pray, or for other quintessential church services.

Similarly, the “legal clinic” (I refer to it as the legal advocacy ministry) which I administer is misconstrued in the Staff Report. While I offer legal advice to people who come in during open hours, this is not a separate program. It is provided as part of the administering of alms or as we call it the “advocacy program.” We sometimes call it a clinic because we want to be clear that during that time, while I am an employee of St. Timothy’s, I am not its attorney. Again, this is not a typical legal clinic, which runs all day with multiple attorneys. If the clergy or other members of the advocacy team identify that someone has a legal question, they can visit me during office hours, and I will do my best to assist them or refer them to someone who can assist them; often, I am making connections for others, as is common for a church leader or staff member. I also provide spiritual counsel when desired by the people meeting with me. I probably spend about 9-10 hours a week with folks at St. Timothy’s (all during our open office hours). I usually work an additional 10-15 hours independently on client matters and research from home, a community partner organization location, or at court. These activities do not take place with members of the public at the church, so are not relevant to the Notice to Abate.

These alms have been administered by St. Timothy’s since before 1989.

I am familiar with St. Timothy’s faithful dedication to alms-giving as something that has occurred since my childhood. I attended the ecumenical Vacation Bible School, which provides a form of childcare for a week while school is out for the summer, in the late 80s and early 90s. I attended the ecumenical Lenten midweek evening services with my family growing up, with a soup supper open to the public and donations collected for alms, usually for hunger-relief efforts.

I was aware of 12-step groups meeting at the church regularly while growing up. It seemed like cars were in the parking lot most evenings when we drove by.

My childhood pastor (Rev. Dr. Gordon E. Myrah of Trinity Lutheran Church in Brookings) played a role in founding the Brookings food bank, and my understanding is that its first location was the “old” fellowship hall at St. Timothy’s. It was still there when I volunteered as a teen in the late 1990s and early 2000s, stacking cans of food and helping needy families and seniors select items to fill boxes of food. I enjoyed serving within the church building with other people

of faith, and so continued to volunteer periodically even after my leadership volunteer hours were complete.

It was because St. Timothy's is open during the week that I found my way back while visiting home on college breaks. I would travel to and from college on the weekends, so I found spiritual support and community at St. Timothy's during its open office hours and noon prayer service. I brought college friends with me, sometimes, who were in discernment about spiritual matters. We could walk in and receive prayer and a blessing, and also use the quiet space of the church nave to pray or converse.

When the Community Kitchen began in the aughts, my mother called me excitedly to tell me about it. She volunteered at the Lutheran location and I joined in volunteering when I would visit home. I was also aware of St. Timothy's participation in the Community Kitchen.

My ordination followed the Rite of Ordination to the Ministry of Word and Service for the Evangelical Lutheran Church in America. The Rite includes the following exhortations and prayers spoken by the Bishop and the gathered assembly which explain that a key tenant of our faith is to provide service to the poor:

“All baptized Christians are called to share in Christ’s ministry of love and service in the world, to the glory of God and for the sake of the human family and the whole creation. You have been called as minister/s of word and service to give leadership in the church’s mission to proclaim the gospel through word and deed.”

“The Spirit of the Lord is upon me, because he has anointed me to bring good news to the poor. He has sent me to proclaim release to the captives and recovery of sight to the blind, to let the oppressed go free, to proclaim the year of the Lord’s favor.” (Luke 4:18-19)

“There are varieties of gifts, but the same Spirit; and there are varieties of services, but the same Lord; and there are varieties of activities, but it is the same God who activates all of them in everyone. To each is given the manifestation of the Spirit for the common good.” (1 Corinthians 12:4-7)

“For Cora, called to the ministry of word and service in the church, that, sustained by your Holy Spirit, she may carry out this ministry with joy and a spirit of bold trust, serve your people and the world in need, and glorify your name...

“For the mission of the church, that in faithful witness it may proclaim the gospel and in humble love serve all in need...

“For the poor, the persecuted, the sick, the lonely, the forgotten, and all who suffer; for refugees, prisoners, and all who are in danger; that they may be relieved and protected.”


“Holy God, holy and mighty, holy and immortal, we thank you for sending your Son, Jesus Christ, your Word made flesh, who proclaimed your gracious reign in words and in deeds of service to the poor and the suffering; who humbled himself, taking on the form of a

servant; and who showed us that the one wishing to be great must be servant of all. We praise you for the many ministries in your church, and especially this day for calling people to the ministry of word and service: to proclaim your life-giving word in faithful and diverse ways, to equip all the people of God for their work of ministry, **and to serve a world in need.”**

“Cora, care for God’s people, bear their burdens, and do not betray their confidence. Serve the needy, care for the sick, comfort the distressed, and, through words and actions, witness faithfully to God’s love for all people. Cross every barrier that stands between the church and its ministry in the world. Seek out those places where the gospel of Jesus Christ meets the world’s need.”

Thank you for considering this information.

Sincerely,

A handwritten signature in black ink, consisting of the letters 'C' and 'R' followed by a long, horizontal, slightly wavy line.

Rev. Sister Cora Rose, Esq.
ELCA Deacon

EXHIBIT C

Church Use Examples Zoning		
Church	Service Provided	Zone
Submitted by St. Tim's		
The Connecting Grounds (Springfield, Illinois)	Computer lab and rest area	Commercial
Trinity Lutheran Church, Legal Outreach Center (Indianapolis, Indiana)	Legal services	Special Commercial District (multi-use zone that combines commercial and non-commercial uses, including residential)
Fame Church (Los Angeles, CA)	Legal services	Commercial (set up as a mixed-use zone that allows some residential development)
Brookings Nazarene (Brookings, OR)	Guidance/counselling; Food pantry	R-1-6
Trinity Luther Church (Brookings, OR)	Collects donations for the food bank	R-1-6.
Brookings Harbor Foursquare Church (Brookings, OR)	Collects and distributes goods to those in need	R-3
Brookings Presbyterian Church (Brookings, OR)	Hosts bi-weekly Alcoholics Anonymous meetings	R-3
Other Churches Provided to Planning Commission Independently		
Gloria Dei Lutheran Church (Coos Bay, OR)	Food pantry; first step program;	Small Lot Residential
Crescent City United Methodist Church (Crescent City, CA)	Safe Space (rest, recharge phones, eat food, clothes closet, use the bathroom); day program (to-go meals, bathrooms, warm place to rest and regroup daily); NA and AA	Residential-Professional District (transition between residential and commercial that provides for a mixture of residential and professional office uses).
Calvary Luther Church	On-site pastoral counselling	Residential R-4 (high density residential)

EXHIBIT D

OZARKS

New church in north Springfield partners with Gathering Friends to serve poor, homeless



Jackie Rehwald

News-Leader

Published 10:25 p.m. CT July 21, 2019 | Updated 10:14 a.m. CT July 22, 2019

Some might think the old strip mall — which used to contain a bar and a barber shop — at the corner of Commercial Street and National Avenue is an unusual place for a church.

But to Pastor Christie Love, it was the perfect location for the Connecting Grounds, an interdenominational church planted last September devoted to helping those in poverty.

"God has developed a huge heart in me for north Springfield," Love said. "I was on staff at another church and really felt a tug that we needed a different kind of church that was meeting some of the practical needs of our community in north Springfield."

Meeting those "practical needs" includes offering a low-barrier food and clothing pantry to anyone in need (no matter where they live or if they have a home), offering a safe place for foster kids and their biological parents to visit with each other, serving dinner and fellowship to those living in the neighborhood and creating a welcoming place for homeless folks who might need a drink of water or to rest on a couch for a little while.

When Love and her team at Connecting Grounds learned that Gathering Friends, a group of volunteers who help the homeless, was looking for a new place to serve dinner to homeless people on Tuesday nights, they reached out.

"We had a conversation with them very early just to say, 'Let us know what we can do. I think our heart is for the same people,'" Love said. "We are helping a lot of the same people."

The resulting partnership launched Tuesday evening when about 75 homeless people, as well as people from the neighborhood, were given sack meals from Gathering Friends volunteers.

Each bag contained a peanut butter and jelly sandwich, cucumber slices, bananas, chips, granola bar, cupcake and soda or water.

The meals were handed out in the parking lot, but people were welcome to eat inside the air-conditioned church.

Another 60 bags were handed out to homeless people who came to Grace United Methodist Church in downtown Springfield, where Gathering Friends has been providing a Tuesday night meals for some time.

Gathering Friends co-founder Jennifer Cannon said the switch to Connecting Grounds will allow the volunteers to help a "more diverse audience that was underserved, while still serving our unsheltered friends."

Cannon said they will hand out sack meals at Grace United one more week, in an effort to let the homeless people know the Tuesday night outreach has moved.

'This is why we are here'

The two organizations — Connecting Grounds and Gathering Friends — have been working together for a few months.

In March, the Gathering Friends left the Veterans Coming Home Center, their longtime meal serving spot. Instead of serving breakfast and lunch at that homeless drop-in center, Gathering Friends began collecting food for the Connecting Grounds food pantry.

Cannon said she felt Tuesday night's meal service went great. They served more people than they expected, Cannon said, and "really enjoyed meeting new people."

"Each time we are in a location with new people we are just overwhelmed by how great the need is," Cannon said "You could seriously pop up anywhere north of Sunshine with cold water and sandwiches and have appreciative people wait in the hot sun to accept and appreciate your food."

Connecting Grounds Pastor Love stood a few feet away and watched the line of people make their way to the table to be given a bag of food.

"I love it. This makes my heart really happy," she said, smiling. "This is why we are here."

Gathering Friends will continue to serve sack meals at 5 p.m. Tuesday from the parking lot at Connecting Grounds, 1109 E. Commercial St.

The group also serves breakfast on Tuesday and Thursday mornings for the men at Victory Square and on select nights at Franciscan Villa. Learn more about how to get involved by following the Gathering Friends' Facebook page.

'You get to shop and act normal'

With the Gathering Friends' Tuesday night meal being moved to Connecting Grounds, the ladies who stay at Safe to Sleep will now catch their bus to the shelter at the church on Tuesdays.

For that reason, many of those women made their way to the Commercial Street church before the meal was served earlier this week.

Since Kyla's Closet (the clothing bank) was open, most of the women perused the racks looking for clothes.

Cherice Evans, 46, was among them. She said she's been staying at Safe to Sleep, an overnight shelter for homeless women, for a few months.

When she was done picking out clothes, Evans sat outside in the shade and talked about being homeless in Springfield.

"These people are forced to walk so many miles, and they are just tired," Evans said, motioning to the homeless people around her.

Evans expressed frustration at not being welcome inside area businesses.

"You can't get a drink, can't use the bathroom," she said, starting to cry. "If you go to the library, you are not allowed to sleep. I found that out today."

"Here, they are really hard on the homeless," Evans said.

Still, Evans said she appreciated what Connecting Grounds and Gathering Friends are doing for the homeless. She said she enjoyed picking out fresh clothes in Kyla's Closet.

"You get to act like you're normal," Evan said. "You get to shop and act normal."

Kyla's Closet used to be a thrift store/clothing bank started by a woman named Jody Rice. Rice named the store after her daughter, Kyla, who died.

"Jody wanted to be able to help single moms," Love explained. "Kyla had a huge heart for helping people."

But the thrift store operation grew. And grew.

"Jody's heart was really to help people more than to be in business," Love said. "Someone introduced the two of us. And I said, 'We have a bunch of empty space we are not using right now.' So we ended up bringing the entire store down here."

Kayla's Closet is not a thrift store anymore; the clothes are free.

People can fill up a bag of clothes once a month.

'The need is completely overwhelming'

As for the Connecting Grounds' food pantry, people can get food bags twice a month.

The food pantry has fewer requirements than most traditional food pantries, which makes it easier for a homeless person or for someone who doesn't live in Greene County to get food. But that also means it is not eligible to receive food from a food bank, like Ozarks Food Harvest.

"We are totally dependent on businesses and people to do food drives," Love said, "because the need is completely overwhelming."

The Connecting Grounds offers two different types of food bags. There is a "cooking bag" for those who have a home and electricity.

"They have the capacity to cook things so sometimes that is stuff to make spaghetti, Hamburger Helper, stuff to make tacos," she said.

"Whereas our homeless friends, we do snack bags," Love continued. "Those are all ready-to-eat food, things more like beef jerky or pop-top pastas, peanut butter crackers, protein bars, bottles of water."

In the six months Connecting Grounds has been open, 800 families have been served there, Love said.

Donations of food and gently-used clothes and shoes can be dropped off during these times:

Tuesday 9-11 a.m. and 2-6 p.m.

Thursday 2-8 p.m.

Friday 3-8 p.m.

Sunday 8-9 a.m. and 11:30 a.m.-noon

Connecting Ground also has a program called Family Connection, in which the church opens up to allow foster children visit with their biological family.

Games, activities, books and crafts are available to families to use during their time together.

If a child has a birthday, Love said they throw a little party with cake and decorations.

'It just needs a little bit of love'

Love is part of the Child Abuse and Neglect Collaborative through Community Partnership of the Ozarks.

"We are in the process of recruiting other churches to join with us in this program," she said.

"Our goal is to have a south-side church, an east-side church, a west-side church and a central church that we can train this fall."

Love said she has been amazed at how the church has grown and how well-received it's been in the neighborhood.

From the first day they began cleaning the buildings, Love said folks from the neighborhood would come over and ask what was going on.

"We would say, 'We are opening a church,'" Love said. "Every single person has been like, 'Oh my gosh, thank you, thank you, thank you.'"

Love said it breaks her heart when someone suggests she planted the church in a "scary part of town."

"I'm like, 'No, it's a beautiful part of town," she said. "It just needs a little bit of love."

Learn more about Connecting Grounds at theconnectinggrounds.com.

Connecting Grounds has a traditional church service twice a week: 9:30 a.m. Sundays and 6:30 p.m. Tuesdays.

EXHIBIT E

Get Involved

“Not all of us can do great things. But we can do small things with great love.” Mother Teresa

To fill the gaps in our community and meet the needs of our neighbors in need- it takes all of us coming together in love to find the ways that we can help to bring about positive change. Below are many of the ways that you can get involved and help us **love out loud** and make Springfield a better place for all who call it home:

Street Outreach. At The Connecting Grounds (TCG), we have two seasons of street outreach.

In the winter, we have two outreach teams out every night when it is colder than 40 degrees. We go around in our vans loaded with supplies and check on people, give out survival supplies, talk to people about shelter options, and give rides to a shelter if beds open.

In the summer, we have teams out during the day between 1 PM-3 PM when it is hotter than 95 degrees. We drive around and hand out cold water, Gatorade, ice packs, cooling towels, sunscreen, popsicles, and aloe to help vulnerable individuals cool off on hot days.

CONNECT TO OUR STREET TEAM COMMUNICATION PLATFORM

Volunteer at The Community Outreach

Center. Located at 3000 W. Chestnut Expressway, our Outreach Center is open 9 AM - 1 PM Tuesdays, Thursdays, and Saturdays. It offers a clothing closet, computer lab, survival supplies, food pantry, medical clinic, haircuts, and more.

Our most significant needs for community volunteers at this time are to work our check-in process, and welcome desk, help in our computer lab, and provide haircuts to guests to sign up for these roles, click the button below.

EMAIL US TO START VOLUNTEERING AT THE OUTREACH CENTER

Medical Volunteering. We have a first aid and wound care clinic at our Outreach Center, and we are always in need of people with medical training to come and help us care for the minor health issues that guests might

be having as well as help them navigate the healthcare system for help with larger issues.

JOIN OUR BAND GROUP FOR MEDICAL VOLUNTEERS

Like to prepare for food for groups of people? We have several different regular meal needs at The Outreach Center and in the Community where we need meals prepare.

OUTREACH CENTER BREAKFAST

PROVIDE DINNER TO OUR NIGHTLY SHELTER GUESTS

FRIDAY NIGHT OUTREACH MEALS

Want to work with families? We run a Family Connection program all year long that supervises visits for kids in the foster care system with their parents. Volunteers in this program get the chance to build strong relationships with kids and parents who are separated and support them as they work to reunify. We also work with other churches to train them to bring this program to their churches.

LEARN MORE ABOUT FAMILY CONNECTION AND GET INVOLVED

Transportation. There is always a HUGE need for people willing to help drive individuals to appointments, court dates, and sometimes back to family out of the area.

YOU CAN JOIN THE TRANSPORTATION TEAM BY CLICKING HERE

Join our TCG Pet Fostering Team. Sometimes, our friends on the street need to have their pets fostered to help them access resources, programs, and other ways to overcome barriers or address medical needs. If you are interested in helping to love on some very sweet dogs or cats from time to time.

TO JOIN OUR FOSTER PETS FB GROUP, CLICK HERE

TCG Volunteers FB Group. We use this FB group to share unique volunteer needs. Be sure to join it to stay connected and learn about future needs.

TO JOIN THIS GROUP, CLICK HERE

Donate new or gently used items that can be used by our neighbors in need. Donations can be dropped off at 3000 W. Chestnut Expressway on Tuesdays/Thursdays/Saturdays between 9 AM-1PM. We take donations of survival supplies, clothing (not dress clothing), tennis shoes, medical supplies, food, and more.

[VIEW OUR GREATEST DONATION NEEDS](#)

Shop our current Amazon Needs lists to help provide food and supplies for street outreach, medical outreach, and the Outreach Center.

[AMAZON LIST FOR OUTREACH SUPPLIES](#)

[AMAZON LIST FOR FOOD PANTRY](#)

[AMAZON LIST FOR MEDICAL SUPPLIES](#)

Donate to the TCG Outreach Fund: This fund helps to meet needs and fill gaps. 100% of the money given to this fund are used for outreach purposes for things such as; prescriptions, eye glasses, supplies, housing

fees, vital documents, gas cards, hotels and much more!

GIVE TO THE OUTREACH FUND

In addition to these ways to volunteer through The Connecting Grounds and Crisis Cold Weather Shelters, other great organizations that need help:

Youth Connect Center- that serves homeless teens between 13-18.

O'Riley Center for Hope

Gathering Friends

Eden Village

Harmony House

We hope you each find a way to connect to an ongoing volunteer opportunity to help us bring about positive change in our community.

Find Us:



Our Church

Location (Mailing Address):

4341 West
Chestnut
Expressway

Our Family

Connection Center:

4347 West
Chestnut
Expressway

Our Community

Outreach Center:

3000 West
Chestnut
Expressway

Sign up for for our Newsletter!

Sign up with your
email address to
receive news and
updates.



DISCIPLES
OF CHRIST

CONTACT US

SIGN UP

We respect your privacy.

LOVE OUT LOUD STORE

PARTNERSHIP REQUEST FORM

EXHIBIT F



[GET HELP](#) [CONNECT](#) [DONATE](#) [VOLUNTEER](#) [ABOUT](#) [CONTACT](#)



Join us in promoting justice for all people.

[LEARN](#)

[DONATE](#)

[VOLUNTEER](#)

Do you need legal help?
The first step is to schedule

an intake appointment:

SCHEDULE AN INTAKE



We are
excited to
welcome
you!

Our main office* in
Indianapolis is open:

- Monday-Thursday,
9am-3pm
- Friday, 9am-12pm

You can also reach us
by phone at **317-429-
4131** Monday-Friday,
9am-5pm.

If you are seeking legal help, please **first** schedule an intake appointment with us here.

*Please note: Some of our services (e.g. expungement and eviction assistance) are offered at locations separate from our main office. Visit our intake page to learn more.

Do justice. Love mercy.
Walk humbly.

- MICAH 6:8 (abridged)



About Us

Neighborhood Christian Legal Clinic believes everyone should have access to justice regardless of their income, so we provide free legal services to those who cannot afford them. We're a faith-based organization that seeks to show God's heart for justice by serving and empowering all clients, regardless of background or religion. Our goal is to free our clients from the legal burdens that have kept them from flourishing. The Clinic's main office is in Indianapolis, but we also provide services statewide.

Vision

Justice for the vulnerable so that all may flourish.



DID YOU KNOW?

Every dollar you invest in
civil legal services returns

\$6.70.

Source:
The Indiana Lawyer

Mission

To promote justice through legal representation and legal education for our low-income neighbors as a way of demonstrating Christ's love.

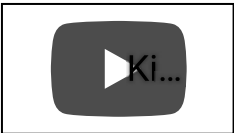
Clinic news—right to your inbox!

Sign Up for Monthly eNews

For Email Marketing you can trust.

Legal Services Transform Lives

Client Story Videos



Hearts for Justice Blog



May 31, 2023
A Clinic Volunteer Story



May 30, 2023
Client Story: Immigration Hope after Fleeing Persecution



May 29, 2023
Memorial Day Spotlight: Helping Veterans in Need



May 28, 2023
Client Story: Tax Justice for Hard-Working Refugees



May 27, 2023
Client Story: Justice When Wages are Wrongfully Taken



May 26, 2023
Re-Entry Justice Story: A Clean Start

The Clinic does not discriminate in the delivery of services or benefits based on race, color, national origin, religion, sex, disability, age, sexual orientation, or gender identity.

Events

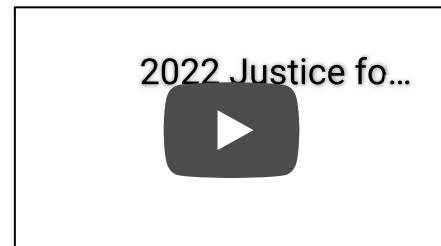
Upcoming



Justice for All Celebration

5:30 PM – 8:30 PM

Past



Preventive Legal Education

We periodically go LIVE on Facebook with new content covering a variety of legal issues our neighbors may face. Topics include landlord/tenant issues and eviction, immigration and survivor justice, tax, and more. Follow us on **Facebook (@NCLegalClinic)** to be notified when we go LIVE, or find past videos by clicking the button below:

Legal Help Online:

We are temporarily pausing our Legal Help Online program in order to update our website and processes. Please check back later.



3333 N Meridian Street, Suite 201, Indianapolis,
Indiana 46208



EXHIBIT G



The **FAME Legal Clinic** provides services to thousands of low-income residents in the greater Los Angeles area on a non-discriminatory basis. Since we opened our doors in 1993, our mission is to improve public confidence in our legal system by delivering free legal services, referrals to government agencies, mediation services and referrals to other fee and non-fee legal service providers. Consultation dates are as follows:

January 8, 22	February 5, 26
---------------	----------------

March 5, 19	April 2, 23
May 7, 21	June 11, 25
July 9, 23	August 6, 20
September 10, 24	October 15, 29
November 5, 19	December 3, 17

Our staff of dedicated volunteer attorneys, paralegals and law students provides services in the following areas:

- Bankruptcy
- Child Custody
- Criminal/Expungement
- Divorce
- Employment
- Landlord & Tenant Disputes
- Personal Injury/Work Injury
- Probate
- Real Estate
- Social Security

The Legal Clinic, a collaboration between the First AME Church (FAME), the Temple Isaiah, Public Counsel and the

UCLA School of Law, is supported by the State Bar of California, the Los Angeles County Bar Foundation and several other prestigious local Bar Associations. Our paralegals and law students come from preeminent law schools in Los Angeles such as: USC, UCLA, Loyola, Southwestern, Pepperdine and Southwest College. Note: The FAME Legal clinic DOES NOT represent clients.

--	--

[Click here to register for Legal Clinic!!](#)

FREE LEGAL CONSULTATION

Volunteers are available to help you with legal issues



FAME LEGAL CLINIC

Sundays 10 a.m. - 1 p.m.

Consultation Dates:

January 8, 22	July 9, 23
February 5, 26	August 6, 20
March 5, 19	September 10, 24
April 2, 23	October 15, 29
May 7, 21	November 5, 19
June 11, 25	December 3, 17

Our staff of dedicated volunteer attorneys, paralegals and law students provide services in:

- Family Law
- Criminal/Expungement
- Landlord/Tenant Disputes
- Veterans Benefits
- Wills/Trusts/Probate/Estate
- Bankruptcy
- Employment
- and more

TO REQUEST ASSISTANCE VISIT:

www.famechurchla.org/free-legal-clinic/



TENPLE
ISAIAH



FAME Renaissance Center | 1968 W. Adams Blvd. | 323-643-1675

EXHIBIT H

Document title: Immigration Legal Services - Catholic Charities of Oregon

Capture URL: <https://www.catholiccharitiesoregon.org/services/immigration-legal-services/>

Page loaded at (UTC): Tue, 27 Jun 2023 17:06:44 GMT

Capture timestamp (UTC): Tue, 27 Jun 2023 17:07:13 GMT

Capture tool: 10.24.3

Collection server IP: 3.90.170.83

Browser engine: Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/108.0.5359.215 Safari/537.36

Operating system: Windows_NT (Node 16.17.1)

PDF length: 6

Capture ID: 9tD3PqtMq2cMQfbPLMYhXT

User: sr-dhall



SERVICES > IMMIGRATION LEGAL SERVICES

IMMIGRATION LEGAL SERVICES

Founded in 1996, our Immigration Legal Services division works to protect individuals and maintain and reunify families in need.



CONTACT US

If you need immigration legal assistance, please reach out to us.

P. (503) 542-2855

E. ILS-INTAKES@CCOREGON.ORG

CONTACT →

VOLUNTEER OPPORTUNITIES

LEARN MORE [🔗](#)

DONATE TO: IMMIGRATION LEGAL SERVICES

DONATE

WORKING TO KEEP FAMILIES TOGETHER

Catholic Charities' Immigration Legal Services (ILS) program is a nonprofit law program providing low-cost consultations and legal representation to immigrants and refugees throughout Oregon and southwest Washington. We also educate the public, immigrant communities, and the organizations who serve them to promote justice for all newcomers and support conditions for their full participation in American society.

We focus on family reunification and assistance to the most vulnerable immigrants and refugees, including survivors of domestic violence, and sexual assault.

"It is necessary to respond to the globalization of migration with the globalization of charity and cooperation, in such a way to make the conditions for migrants more humane."

– Pope Francis



DONATE



OUR SERVICES

- Family-based applications/visas
- Permanent residency (Green Card)
- Naturalization and citizenship
- Deferred Action for Childhood Arrivals (DACA)
- Survivors of domestic violence, sexual assault, and child sexual abuse (VAWA)
- Visa for crime victims (U-Visa)
- Temporary Protected Status (TPS)
- Asylum
- Removal Defense
- Refugee adjustment of status/family petition

We also offer other types of assistance on a case-by-case basis.

Clients enrolled with ILS should contact their representative to make an appointment. Walk-in appointments will not be accepted.

WHOM WE SERVE

ILS provides help to clients with diverse backgrounds and varied needs:

- Families that have been separated
- Survivors of domestic violence, stalking, and other violent crimes ([learn more](#))
- Refugees
- Dreamers (DACA)
- Foreign-born spouses or children of U.S. citizens
- Immigrants without criminal offenses who face deportation/removal
- Low-income individuals and families seeking documentation

- Foreign-born spouses or children of U.S. citizens
- Immigrants without criminal offenses who face deportation/removal
- Low-income individuals and families seeking documentation



CENTER FOR REMOVAL DEFENSE

In conjunction with our ILS team, the Center for Removal Defense provides high-quality immigration legal services to low-income immigrants and refugees and engages in public education, training, and community outreach to foster migration-positive communities and full participation of all newcomers.

[VIEW SERVICE →](#)

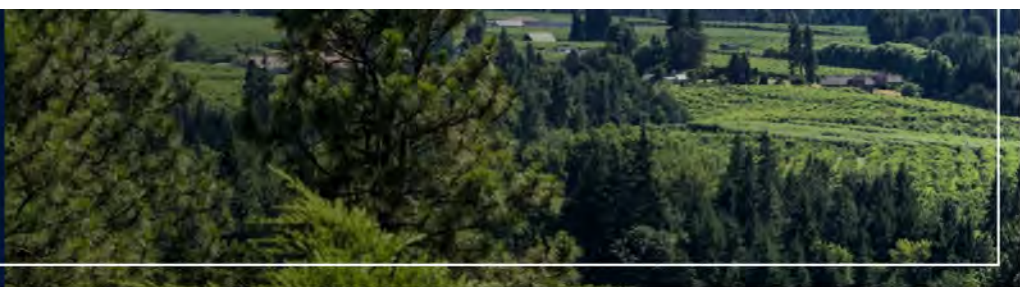


RURAL COMMUNITIES PROGRAM

We provide free immigration legal services for survivors of domestic violence, dating violence, sexual assault, and stalking in rural Oregon.

[VIEW SERVICE →](#)

VIEW SERVICE →



FEB 24, 2023
LAW STUDENTS HELP WITH LEARNING

ARTICLES

IMMIGRATION LEGAL SERVICES

FEB 24, 2023

LAW STUDENTS HELP WITH LEARNING

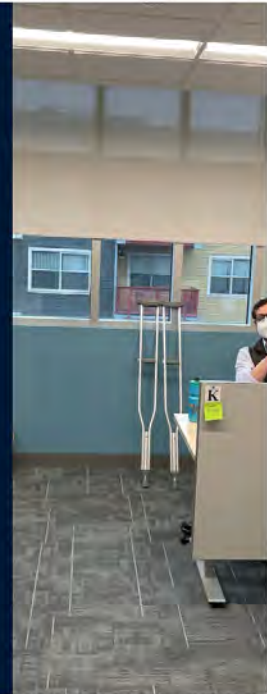
Students from local law schools who volunteer with Catholic Charities of Oregon Immigration Legal Services assist immigrants, asylees, refugees, recent arrivals from Afghanistan, and survivors of serious crimes, all while learning from the agency's immigration lawyers. Students can earn school credit through an externship under the supervision of a Catholic Charities attorney or serve as interns....

READ MORE →

JUN 29, 2021
AFTER 42 YEARS OF SERVICE, IMMIGRATION LEGAL
SERVICES STAFF MEMBER RETIRES

MAR 17, 2021
ACUTE NEED FOR ASSISTANCE CONTINUES AMID OREGON
WILDFIRE AFTERMATH

JAN 12, 2021
POLÍTICA DE INMIGRACIÓN DURANTE LA TRANSICIÓN DE LA
ADMINISTRACIÓN PRESIDENCIAL



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EVENTS

LEADERSHIP

BOARD AND COMMITTEE

OPPORTUNITIES

OUR VALUES

OUR IMPACT

OUR CATHOLIC IDENTITY

OUR FINANCIALS

MEMBER AGENCIES

CAREERS

SERVICES



Catholic Charities

PROVIDING HELP CREATING HOPE



VOLUNTEER

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LEARN MORE →



FEB 24, 2023

LAW STUDENTS HELP WITH LEARNING

JUN 29, 2021

AFTER 42 YEARS OF SERVICE, IMMIGRATION LEGAL SERVICES STAFF MEMBER RETIRES

MAR 17, 2021

ACUTE NEED FOR ASSISTANCE CONTINUES AMID OREGON WILDFIRE AFTERMATH

JAN 12, 2021

POLÍTICA DE INMIGRACIÓN DURANTE LA TRANSICIÓN DE LA ADMINISTRACIÓN PRESIDENCIAL

ARTICLES

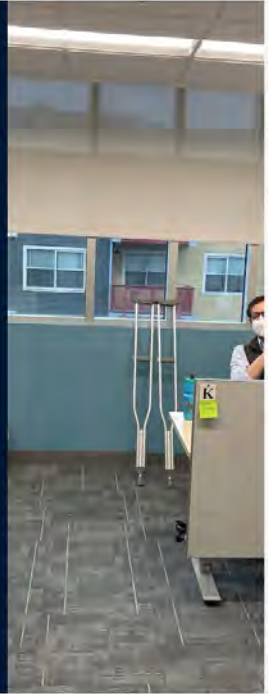
IMMIGRATION LEGAL SERVICES

FEB 24, 2023

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Catholic Charities

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EXHIBIT I



We are united to meet the needs in our local community with the compassion of a loving God. Our vision is to help others feel that they **BELONG** by bringing them into our open doors to meet a physical, spiritual, relational, or emotional need. Through this step, we want to lead them to **BELIEVE** in the one true God and **BECOME** mature Christ-followers who will share their stories with others.

The Community Care ministry is made up of a three-pronged approach:

- **Food:** BNaz and Brookings-Harbor Food Project
- **Finance:** Community Care Fund (including the Love Fund)
- **Family:** Other long-term partnerships with families from a guidance/counseling basis - (spiritual, financial, relational, and emotional needs)





Monday		<u>St Timothy's Church</u>	11-12
Tuesday		<u>Lutheran Church</u>	12-1
Wednesday		<u>Catholic Church</u>	12-1
Thursday		<u>Presbyterian Church</u>	12-1
Friday		<u>St Timothy's Church</u>	12-1
Saturday	1st, 3rd or 5th	<u>St Timothy's Church</u>	12-1
Nazarene	2nd or 4th 12-1	Brookings Church of the	
Sunday 4:30 PM		<u>St Timothy's Church</u>	3:30-

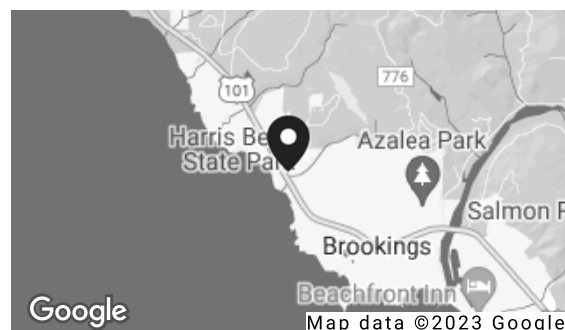
Weekend Service Times

Join us in-person or online
Saturdays at 6:00 p.m.
and Sundays at 10:30 a.m.

Location

Street Address:
1600 Chetco Avenue
Brookings, OR 97415

Mailing Address:
PO Box 6519
Brookings, OR 97415



WATCH LIVE

WATCH PAST SERMONS



[HOME](#) [LOGIN](#)

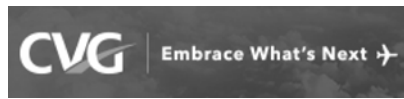
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541-469-2571



EXHIBIT K

A nonprofit publication of the **Kentucky Center for Public Service Journalism**



Business	Education	Government	Health	Living	News	NonProfit	Region/State	Sports	Voices	
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Home News Ticker Madison Avenue Christian Church continues its community ministry during crisis, including meals

Madison Avenue Christian Church continues its community ministry during crisis, including meals

Apr 7th, 2020 · 0 Comment

For sixteen years, Madison Avenue Christian Church (MACC) has quietly been providing meals for the homeless and poor through its community ministry programs. That effort has not stopped, despite the mandate for reduced crowd sizes during the COVID-19 crisis, but now the meals are served in a brown bag and distributed in the church parking lot. Allowing for social distancing and safe food handling, volunteers are bagging sandwiches and using gloves when handling the food bags.

"These are challenging times but it doesn't change the fact that people need help and they are hungry," said Madison Avenue Christian Church Reverend Simon. "Our volunteers, many of whom have been with us for years, are struggling to purchase the meats and sandwich items needed to fill the bags, they are making several trips to grocery stores to buy enough food. We are doing everything within our power to keep feeding the people who have nowhere else to go for a meal."

Utilizing the food preparation guidelines set forth by the Northern Kentucky Health Department, the church is serving about 125 meals each Monday and Wednesday evening and the numbers are growing. Like many churches in the region, Madison Avenue Christian Church is streaming live on Facebook their Sunday worship services at 10:45 a.m.



Working with several hundred volunteers each year, the church provides two community meals each week, serving approximately 200 guests at each meal. On the first Saturday of each month, church members collaborate with First Christian Church in Covington to provide evening meals. The quarterly Samaritan Car Care program provides oil changes and minor car repairs for low-income individuals who need help maintaining their automobile. Next door to the church is a transitional residence that is sponsored by the church, providing shelter and services to a family in need.

In addition to serving the community, MACC has put a great deal of effort into beautification of the church grounds, facilities and cherished stained-glass windows, providing beauty and a sense of community for the residents in the surrounding neighborhoods.

A Disciples of Christ affiliated church, Madison Avenue Christian Church has an over 100-year commitment to the citizens of Covington, currently hosting a robust community meal program for those in need and sponsoring a Samaritan Car Care program that assists women with families who are unable to afford the cost of routine maintenance and minor repairs to their cars. The church has provided medical programs in conjunction with NKU nurses and registered individuals for the Affordable Care Act. Dedicated church members and hundreds of community volunteers serve on average, 15-20,000 hot meals a year, and over 275,000 meals have been served since the beginning of the program in 2004.

To learn more, the website.

Archives

Select Month ▼



Sign up for
NKYTribune News Updates



**Our neighbors are struggling to
put food on the table.**

**HUNGRY TO HELP? Give online at
www.svdpnky.org. THANK YOU!**

Related Posts



Madison Avenue Christian Church, NKU to host community health fair March 27 in Covington

03/9/2023 · 0 Comment



Cats Honor past, earn first sweep of Volunteers In over a decade with 66-54 victory Saturday at Rupp

02/19/2023 · 0 Comment



Kentucky Arts Council seeking volunteers March 9-12 for 2023 Kentucky Crafted Market in Lexington

01/19/2023 · 0 Comment

Leave a Comment

Name *

Email *

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Great Benefits
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Ad sponsored by Republic Bank

I live here and I give here.

Horizon

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WWW.HORIZONFUNDS.ORG

LEARN HOW YOU CAN SUPPORT OUR UNCOMMON COMMUNITY





75 Orphanage Rd.
Fort Mitchell, KY
41017
859-331-2040
DCCHcenter.org

Who we are and what we do:

- **Our Mission and History:**

Our Mission: To express God's love by providing compassionate care and quality services to address the physical, spiritual and emotional needs of children and families.

For over 160 years, DCCH Center for Children and Families has served the needs of more than 3000 children in Northern Kentucky, as a faith-based, non-profit agency.

- ◊ Residential Facility
- ◊ Foster Care and Adoption
- ◊ Independent Adoption
- ◊ Outpatient Therapy Center



How you can help:

- **Volunteers:** Many volunteer opportunities are available, including mentoring children, volunteering at special events, serving as classroom aids at Guardian Angel School, providing childcare for our foster parents, and more.

- **Foster:** Over 300 children are in need of a placement each month.

- **Adopt:** Give a child and yourself a "forever family".

- **CONTACT:** Sarah McAdams at SMcAdams@dcchcenter.org for more information.



#Changealife
DCCHcenter.org




Affiliations

- Institute for Nonprofit News
- Online News Association
- N. Ky. Chamber of Commerce
- Covington Business Council

EXHIBIT J



BROOKINGS-HARBOR SCHOOL DISTRICT

Search this site 

[Schools and Programs](#) » School Based Health Center - Coast Community Health

School Based Health Center - Coast Community Health



STUDENT HEALTH CENTER

Brookings Harbor School District

Planned opening November 2022 – Location: CCH trailer in high school parking area.

Please return the optional registration forms to your school office.

[Calendar](#)

[Staff Directory](#)

[Directions](#)

[Board](#)

What is a School-Based Student Health Center?

A School-Based Health Center is much more than the traditional school nurse's office. It is a medical facility located in the school that offers many health and medical services like your doctor's office (see list below). We do not replace your primary doctor, and all of our services are provided at one of the participating schools. The Student Health Centers are operated by Coast Community Health Center through an agreement with Brookings Harbor School District.

Who works at the Student Health Center?

Our staff includes Family Nurse Practitioners (FNP), who can treat most health problems and prescribe medications, registered nurse (RN), medical assistants (MA), and support staff. Mental health counseling and/or referrals to mental health/drug and alcohol services are also available. All staff are supervised by and have support of the Coast Community Health Center physicians and Chief Medical Officer.

What services are offered?

We can take care of most of your student's health care needs. If there is an emergency or service we do not provide, we contact 911 or will make a referral to another health care provider. When the health center is not open or staff is unavailable, school personnel will follow school guidelines for all emergency situations.

- | | |
|--|---|
| ❖ Wellness and how to maintain it for a lifetime | ❖ Nutrition education and weight management |
| ❖ Physical examinations, routine, and sports | ❖ Diagnosis and treatment of minor illness |
| ❖ Mental health services and counseling | ❖ Dental screening |
| ❖ Referrals to other health care providers | ❖ Vision and blood pressure screening |
| ❖ Immunizations and flu shot | ❖ Tests such as anemia, diabetes, and infection |
| ❖ Assessment of health strengths and challenges | |

What about costs and billing?

Coast Community School Based Health Center wants to provide health care for all students who need it. Many of our services are provided at no charge; however, there are some services that we provide that require an exam and medical action that **may** result in a charge. No student will be turned away due to inability to pay. Examples of some of these services include:

Calendar	Sore Throat	Pink eye
	Ear pain	Abdominal pain
	Cough	Foreign body in eye
	UTI symptoms	Follow up visits
	Staff Directory	Directions
		Board

Sprain/fracture
Head injury

Well Child checks
Immunizations

If a visit does result in a charge, we will bill your insurance for you, including the Oregon Health Plan. We also offer a sliding discount program which is based on your family size and income. Anyone can apply for this program even if you have insurance. We encourage all families to complete an application. An office visit summary will be sent home after a billable service is provided.

What about parental consent?

At the health center we require parental/guardian signed consent for a student to use our services.

*We support and encourage parental involvement in decisions about your student's health care.

What about confidentiality?

Our health services and records are private and confidential. Health records will not become a part of your student's school record and will only be used by health center staff unless you give us written permission to share information.

Like other health care providers, the Student Health Center follows the guidelines of the Health Insurance Portability and Accountability Act of 1996 (HIPAA). HIPAA regulates how medical information may be used and disclosed and how you can get access to this information. We are required to give you a copy of our Notice of Privacy Practices and have you sign the Acknowledgment and Consent which is included in the packet.

Students will be encouraged to discuss visits with their parents; however, confidentiality will be provided at the student's request. Oregon State Law (ORS 109.610, ORS 109.640, and ORS 109.675) requires strict confidentiality regarding evaluation, diagnosis and/or treatment for sexually transmitted diseases, sexuality issues, pregnancy testing or mental health services.

What about appointments?

Appointments are encouraged whenever possible. A parent may call and make an appointment, or your student is welcome to come by and schedule an appointment. Hours will be posted on the clinic door and in the school bulletin.

Información en español - CENTRO DE SALUD ESTUDIANTIL BROOKINGS-HARBOR SCHOOL DISTRICT



[English v2 BHSD SBHC Registration Forms](#)

[Spanish v2 BHSD SBHC Registration Forms](#)

[Calendar](#)

[Staff Directory](#)

[Directions](#)

[Board](#)

Visit [COAST COMMUNITY HEALTH WEBSITE](#)



School Based Health Center trailer - Located in the gated parking area of Brookings-Harbor High School.

[Calendar](#)

[Staff Directory](#)

[Directions](#)

[Board](#)

EXHIBIT L

1200 EASY STREET BROOKINGS, OR | 541-469-3411

(541) 469-3411



Trinity Lutheran Church

SITE CONTENT

Quilters

You don't need to know how to quilt to be of help. Join our friendly group at 10 am Wednesdays, following the Lutheran Hour, for a "tack & tie" session. Donations of cotton fabric are appreciated. All quilts are donated to Lutheran World Relief.
Sewers needed!

Evangelism & Missions Committee

All members are welcome to attend meetings of this outreach committee, a friendly group who pray for and work for the mission of the church. Contact Roger Cox for more information.

Donations Needed This Month

Brookings-Harbor Food Bank - Baking Mix (only commercially canned items accepted)

Check out the donation baskets under the TV in the Narthex - Campbell's soup labels, stamps, and other items

Community Kitchen

Fridays from Noon to 1 pm at TLC.

TLC joins with 5 other local churches to provide the hungry with a daily meal. Everyone is invited; donation is optional. Volunteers to help are always welcome.

BASIC CARE ITEMS NEEDED

- Toothbrushes & travel sized toothpaste
- Non-alcohol mouthwash
- Travel size shampoo
- Disposable razors & shaving cream
- Soap, washcloths & deodorant
- Band-aids, Wet Wipes
- Socks, Rain Ponchos
- Dry dog food

OPTIONAL ITEMS

- AAA Batteries, Flashlights
- Small soap containers, Sewing Kits
- Headband lights

All items must be new and unopened. Place in marked bin under the monitor in the Narthex.

Other Ministries We Support

- Lutheran World Relief
- Hope for the Children of Haiti Orphanage
- Oasis Shelter Home
- Gideons International
- Samaritan's Purse Operation Christmas Child

- Brookings Community Welfare Fund
- Brookings Pregnancy Care Center
- Brookings Harbor Food Bank - see "Donations" above
- AFLC Missionaries
- Lutheran Bible Translators
- Needs of local children through the SMART readers program and winter clothing appeal

CONNECT WITH US



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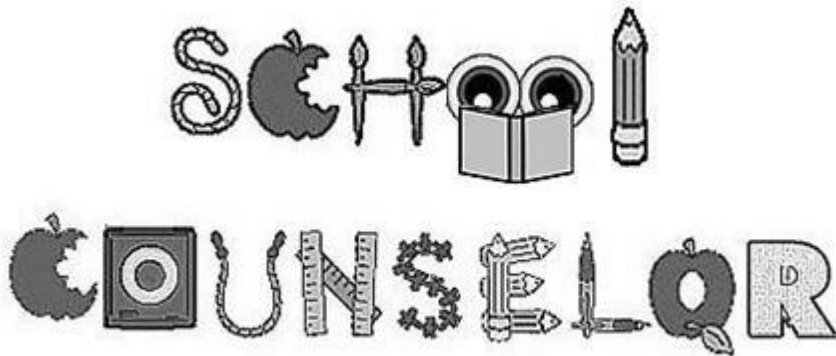
EXHIBIT M



MILL STREET ELEMENTARY
LEWISVILLE INDEPENDENT SCHOOL DISTRICT



COUNSELING



What does an elementary counselor do?

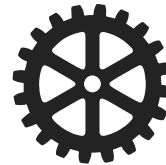
- School counselors serve ALL the students at a school and help them be their best
- Facilitating classroom "Life Skills" lessons aligned with state standards in each classroom

- Organizing school-wide service learning projects and special events as applications of our character education program
- Consulting with parents, teachers, and administrators
- Providing materials to teachers and parents on topics related to the guidance and counseling standards when needed
- Connecting families with school and community resources
- Talking with students who have a problem they'd like help solving or have something on their mind they'd like to talk about
- Visiting with students who could use care and support from an extra adult
- Counseling students in small groups built around shared needs like divorce/changing families, grief, anger management, ect.
- Counseling students individually
- Teaching social skills and coping skills

A Developmental Guidance Program provides services for all students through individual counseling, small group counseling, and classroom instruction.



BUS ROUTES



CANVAS



GRADES



MENUS



NEWS



PAYMENTS



ATTENDANCE



CONNECT WITH US



MILL STREET ELEMENTARY



601 S Mill Street - Lewisville, TX 75057



469-713-5965



972-350-9024

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EXHIBIT N

REYNOLDS

High School

Search

Our Schools » Reynolds High School » Academics » College and Career Center

College and Career Center



The RHS College and Career Center (CCC) is available to RHS students in every grade level. Students interested in exploring their post-high options can email Shannon Selby, *RHS College & Career Coordinator*, for an appointment. Classroom teachers can also schedule tours and presentations on a variety of topics.

The primary goal of the CCC is to spark students' interests and engage them in planning for life after high school. Students who visit the CCC can find the latest information about exploring colleges and universities, college and university admissions, college applications, financial aid (FAFSA/ORSAA), scholarships and grants, Oregon Promise, community service, volunteer opportunities, Naviance, and much, much more!

All RHS students are encouraged to check out the vast array of resources the CCC has to offer. Students should visit the CCC early and often throughout their high school careers, as waiting until senior year to start investigating post-high options can be extremely stressful! Students can seek assistance and support in post-high exploration and planning to achieve bright futures based on their individual ambitions, goals, talents and dreams.

Questions? Contact Shannon Selby, *RHS College & Career Coordinator*

RHS College & Career Center hours:

Contact Us

Open to all RHS students on school days; closed on non-student grading days, conferences & break

Monday-Friday 8:00 AM-4:30 P

Join the **RHS College & Career Center** Schoology group
Code: PR7X-C

Schoology group: **Class of 2023 Counseling** Access Code:



Co



Financial Aid & Paying for Co



Naviance-Your One Stop Shop for College & Career Exploration



Scholarships & Grants

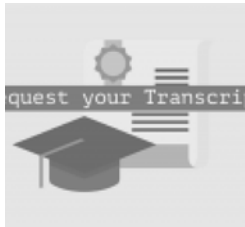
Contact Us



Community Service & Volunteer



Military & JROTC



Request your HS Transcript

Supporting Documents

- Orientation to the RHS College & Career Center (Fall 2022) (4 MB)
- GR 12 College Planning Checklist (141 KB)

Upcoming Events

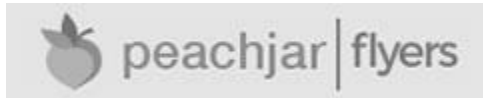
Board Meeting
06/28/2023 - 7:00pm

Online Athletic Clearance Opens
07/03/2023 - 8:00am

Independence Day
07/04/2023 (All day)

Contact Us

View Calendar



[Home](#) | [Website Login](#) | [Careers](#) | [Non-discrimination & Equi](#)

1698 SW Cherry Park Road, Troutdale, OR
(503) 667-3186

a municode design



[Contact Us](#) ↗

EXHIBIT O

CLOTHES FOR KIDS



Clothes
for **kids**

from a community that cares

Clothes for Kids is a district-run, volunteer-supported program that provides free clothing for students (grades K-12) from families with limited income.

Students can visit Clothes for Kids two times per school year.

To schedule an appointment, please use the ParentSquare login button or call 503-356-4322. Appointments are per family, not per student. During the 45-minute appointment, there's a limit of one adult with up to four children or two adults with 5 or more children.

ParentSquare Login (<https://www.parentsquare.com>)

LOCATION

16550 SW Merlo Road

HOURS

Tuesdays: 9:30 a.m. - 3 p.m.
Wednesdays: 9:30 a.m. - 6 p.m.
Thursdays: 9:30 a.m. - 3 p.m.

Donation Bins are available
Monday-Friday
8 a.m. to 4 p.m.

[Skip To Main Content](#)

Please come prepared with size information for each student. During the appointment, volunteers will be available to help you with your shopping needs. Clothes for Kids is a donation-based program that is intended as a supplemental resource. As such, the program may not be able to meet all of the needs of all students.

DONATIONS ACCEPTED

We appreciate donations of clean, school-appropriate, gently-used or new clothing and shoes.

Most urgent needs:

- Boys and mens winter jackets, sizes 10-XXL
- Boys and girls jeans and pants (elastic waist preferred), sizes 5-10
- Girls short-sleeve shirts, sizes 6-18, S-XXL
- Boys & mens athletic shorts, sizes boys M - mens XXL
- Mens athletic shorts, all sizes, especially L-XL
- Girls leggings, sizes 6-8
- Womens underwear, S-M (5-6), must be new in package
- Mens underwear, M (boxer briefs preferred), must be new in package
- Socks in all sizes, especially boys and girls large for shoe size 3-9; must be new in package
- Boys sneakers size 5-8.5

Ongoing needs of the program:

- New underwear and socks for all ages and sizes
- Pants for elementary-aged students in sizes 5-12
- Coats for elementary-aged students in sizes 5-12
- Department store shopping bags with handles

Please call Volunteer Services at 503-356-4443 to schedule "lost and found" school drop-offs.

We accept financial contributions. Please make checks payable to Clothes for Kids and mail to 16550 SW Merlo Road, Beaverton, OR 97003. You also can donate online using our **Online Payment System (/fs/pages/1274)**. Select "Beaverton School District," then select "Clothes for Kids Donation." All the proceeds go to purchasing clothing and shoes for BSD students.



Clothes for Kids



What to Expect After Making an Appointment

English

Clothes f...



Español

Clothes f...



العربية

Clothes f...



Soomaali

Dharka C...



► Frequently Asked Questions/Preguntas & Respuestas

► English

Q: What is the Beaverton Schools Clothes for Kids?

A: The Beaverton Schools Clothes for Kids is a volunteer service organization that provides free clothing for children in need in grades K-12 who are enrolled in a BSD school. It is staffed by Beaverton School District community and parent volunteers. Parent groups and individuals also support Clothes for Kids with financial contributions that are used to purchase new articles of clothing such as socks, underwear and coats.

Students can find school-type clothing at Clothes for Kids such as: jeans, t-shirts, sweatshirts, warm coats, socks and underwear.

[Skip To Main Content](#)

Q: Who can use the Clothes for Kids?

A: Children in need, enrolled in the Beaverton School District may visit Clothes for Kids up to two times (2) each school year and choose ten (10) items per visit. We do not provide clothing for adult members of the family.

Q: Where is Clothes for Kids and when is it open?

A: Clothes for Kids is located in portables on the west side of the Beaverton School District Administration Center at 16550 SW Merlo Road. It is open Tuesdays: 9:30 a.m. - 3 p.m., Wednesdays: 9:30 a.m. - 6 p.m., and Thursdays: 9:30 a.m. - 3 p.m. It is closed during the summer.

Q: Where do clothes for Clothes for Kids come from?

A: Most clothing comes from caring individuals who donate reusable clothing still suitable for children in grades K-12 to wear to school. Clothing also comes from lost and found items left at Beaverton schools. Clothes for Kids has several silent business partners who wish to remain anonymous.

We ask that donated clothing be in good condition (freshly laundered, please) using the rule of thumb, "Would I want my child to wear this to school?" It is important that clothes be free from stains, tears, rips, holes, etc. We want children to feel good about themselves and the clothing that they choose at Clothes for Kids.

Q: What can I do to help Clothes for Kids?

A: Volunteers are the mainstay of operation for Clothes for Kids. The program cannot function at full capacity without volunteer support. Interested volunteers can login to their myimpactpage.com profile to sign up for open shifts. Shifts are available on Tuesdays and Thursdays from 9:15 to 11:30 a.m., 11:15 a.m. to 1:30 p.m. and 1:15 to 3:30 p.m. On Wednesdays, volunteer shifts are 9:15 to 11:45 a.m., 11:30 a.m. to 1:45 p.m., 1:30 to 3:45 p.m. and 3:30 to 6:00 p.m.

Per **OAR 333-019-1030** (<https://nam10.safelinks.protection.outlook.com/?url=https%3A%2F%2Fsecure.sos.state.or.us%2Foard%2FdisplayDivisionRules.action%3FselectedDivision%3D1234&data=05%7C01%7CMeli>) all volunteers — whether inside or outside, whether during the school day or after-school hours — must receive either the two-dose Pfizer or Moderna vaccine OR the single-shot Johnson & Johnson vaccine AND be at least 14 days past their final vaccine dose. At this point, booster shots are not required.

If you have any questions or need assistance signing up to volunteer, please call Johanna Shrout at 503-536-4443 or send an email to johanna_shrout@beaverton.k12.or.us (mailto:johanna_shrout@beaverton.k12.or.us).

In addition to helping families shop, volunteers help sort and hang donated clothing, launder clothes, conduct clothing drives and help clean the facility. A considerable amount of volunteer work continues in the summer.

► **Español**

¿Qué es el Clothes for Kids de las escuelas de Beaverton (anteriormente conocido como El Ropero de Beaverton)?

Clothes for Kids del Distrito Escolar de Beaverton es una organización formada por voluntarios que ofrece ropa a estudiantes en los grados K-12 que están inscritos en alguna escuela del Distrito Escolar de Beaverton. El personal de Clothes for Kids está formado por miembros de la comunidad y padres voluntarios. La asociación de padres y los miembros de la comunidad también ayudan a Clothes for Kids con donativos que se usan para comprar prendas de ropa nueva tales como medias, ropa interior, abrigos y otras prendas de vestir difíciles de encontrar.

En Clothes for Kids, los estudiantes pueden encontrar ropa para usar en la escuela tales como pantalones de mezclilla, playeras, camisas polo, sudaderas, abrigos para el invierno, medias y ropa interior.

¿Quién puede usar la ropa de Clothes for Kids?

Los estudiantes de bajos recursos inscritos en el Distrito Escolar de Beaverton pueden tener acceso al Ropero dos veces (2) durante el año escolar y escoger (10) prendas de vestir gratis por visita. Nosotros no proporcionamos ropa para personas adultas de la familia. Se requiere un pase de la escuela de su hijo para tener acceso a Clothes for Kids.

¿Dónde está ubicado Clothes for Kids y cuando está abierto?

Clothes for Kids se encuentra en el salón provisional al costado oeste de las oficinas administrativas del Distrito Escolar de Beaverton ubicado en 16550 SW Merlo Road. Está abierto cuando hay clases: martes - de 9:30 a.m. a 3:00 p.m., miércoles - 9:30 a.m. a 6:00 p.m. y jueves - 9:30 a.m. a 3:00 p.m. Clothes for Kids está cerrado para las familias durante el verano.

¿De dónde viene la ropa de Clothes for Kids?

La mayoría de la ropa la donan personas bondadosas y es ropa usada en buenas condiciones para estudiantes de K-12 y apropiada para usar en la escuela. La ropa que donan a Clothes for Kids también proviene de *lost and found* (ropa y objetos perdidos que no hayan sido reclamados) de las escuelas de Beaverton. El Ropero también recibe donaciones de negocios colaboradores que desean mantenerse anónimos.

Nosotros pedimos que la ropa que van a donar esté en buenas condiciones (recién lavada por favor) siguiendo la regla práctica, “¿me gustaría que mi hijo se pusiera esto para ir a la escuela?” Es importante que la ropa no tenga manchas, que no esté desgarrada, ni esté rota, etc. Queremos que los niños se sientan bien al ponerse la ropa que elijan en el Clothes for Kids.

¿Cómo puedo ayudar en Clothes for Kids?

Los voluntarios son el pilar principal para el funcionamiento de Clothes for Kids. El programa no puede funcionar su total capacidad sin la ayuda de voluntarios. Personas interesadas en ser voluntarios pueden ingresar a su perfil en la página de myimpactpage.com para registrarse en los turnos disponibles. Hay turnos disponibles los martes y los jueves de 9:15 a.m. a 11:30 a.m., 11:15 a.m. a 1:30 p.m., y 1:15 p.m. a 3:30 p.m. Los turnos disponibles los miércoles son de 9:15 a.m. a 11:45 p.m., 11:30 a.m. a 1:45 p.m., 1:30 p.m. a 3:45 p.m., y de 3:30 p.m. a 6:00 p.m.

Por el reglamento [OAR333-019-1030](#), todos los voluntarios (sin importar adentro o afuera de las instalaciones, ni durante o después del día escolar) deben tener 2 dosis de la vacuna de Pfizer o Moderna, o 1 dosis de la vacuna de Johnson & Johnson. Además, un mínimo de 14 días debe de haber transcurrido después de su última dosis y su sesión de voluntariado. En este momento no estamos requiriendo la dosis de refuerzo.

Si usted tiene alguna pregunta o necesita ayuda para registrarse como voluntario, por favor llame a Johanna Shrout al 503-356-4443 o envíe un correo electrónico a johanna_shrout@beaverton.k12.or.us

Además de ayudar a las familias a escoger ropa para sus hijos, los voluntarios ayudan a separar y colgar la ropa donada, a lavar la ropa, a organizar subastas de ropa y a limpiar el lugar. Una cantidad considerable de trabajo continúa en el verano para los voluntarios.

EXHIBIT P



Home

Immediate Financial Assistance

Rental Assistance

Free Food Pantries

Utility Bill Help

Free Stuff

Work From Home Jobs

Public and Government Assistance

Disability Benefits

Section 8 Housing and Apartments

Senior Help

Free Job Training

Free Money

Free Grants

Free Clothes

Charity Assistance

Church Assistance

Community Action Agency

Help with Medical Bills

Free Healthcare

Free Community Health Centers

Free Dental Clinics

Car Payment Assistance

Debt Relief

How to Save Money

Search the Website

Catholic Charity assistance programs near you.

Catholic Charities provides a number of emergency assistance programs to families, immigrants (documented or not), women and others. A comprehensive listing of the **Catholic Charity financial assistance programs for rent or housing, utility bills, free food or healthcare and counseling services offered are listed below.** People of all backgrounds and religions may be able to receive help. Also find locations, applications and phone numbers of the main Catholic Charity offices near you, and they are listed by state and county.

There are over 3,000 offices, parishes, and Catholic Charity churches that help over 15 million individuals each year. The services offered by Catholic Charities are extensive, and range from free or low cost food, housing programs to strengthen families, rent help, and financial help paying for basic needs or electric bills. The exact types of Catholic Charity programs near you and social services offered will vary by **location, church, and center which are listed below.** Most of the centers only have a limited amount of funding to offer as well.

Financial assistance and basic needs from the charity

The food pantries, Catholic Charity soup kitchens and free food banks that are available to struggling families is how Catholic Charities helps the highest number of people. Millions of free hot meals, emergency food and grocery boxes, and holiday meals (including at Christmas) are provided every year with items given to low-income households.

The pantry often serves as a bridge to the client while they find longer term support. From time to time groceries, food boxes and lunch or dinner meals may even be delivered as well to the homebound, seniors or disabled as part of Meals on Wheels. Most of the Catholic Charity churches are also involved in running soup kitchens as well as congregate dining sites in addition to having grocery giveaways.

A number of **emergency housing services** are offered by Catholic Charities. People who were evicted can find homeless shelters shelter. Individuals can then work with a case manager to move into short term transitional housing, then together you will explore permanent housing options in your local community. As part of this the Catholic Charity social worker will show clients how to get financial help, including funds for paying security deposits and first month's rent.

Catholic Charity affiliated churches may offer **financial assistance for paying bills** as well as for other basic needs. Of course funding needs to be available, and applicants need to meet conditions before Catholic Charities will provide them with any type of emergency financial help. There is often a waiting list in place by each church, and applications for funds are first come and served. Cash assistance can be provided to the working poor to pay for some or all of the following.

Single Mother Assistance

Ad SPAOA

Housing Appical

Ad usafundi

Coming Soon to West Linn

Ad David Weekley Homes

Rent Re Program

Ad unitedfan

Utilities - Money to pay to prevent a disconnection of electric or water bills. Or if you have run out of heating fuel or oil then Catholic Charities may help.
Clothing - Including work uniforms, free clothes for kids or adults and school for children attending school.

Funeral and burial help from Catholic Charities - The uninsured, low-income and indigent can get help burying, or

cremating, a loved one from the charities, with a focus on people of Catholic or Christian faith.

- **Prescriptions** - Only a select few locations can pay for medications or give free prescription vouchers, and this form of assistance is very limited.
- **Rental assistance** - Get help in an emergency to pay rent if you are faced with imminent eviction, and some funds can be paid for security deposits.
- **Medical needs** - Catholic Charities often has information on clinics, free healthcare services or applications to Christian health insurance programs.
- **Charity dental care** - Social workers refer the poor, immigrants and uninsured to mobile dental clinics, dentists that volunteer, and other free exams or care. Locate dental charity programs.

Before any financial aid is offered, they will usually need to ensure low-income people can get back on their feet after the funds have been paid out. As the emergency assistance for basic needs is very short term in nature, and all applicants need to show the ability to be self-sufficient. Other resources offered are listed below, or find additional information on high demand services, such as help with rent payments.

Free holiday assistance is provided by Many Catholic Charity churches. They help people regardless of their age, religion, ethnicity or gender. Catholic Charities will usually serve free meals at Thanksgiving, Christmas and Easter. Kids from low-income household, single mother homes (or women facing DV) can often be given free Christmas toys, gifts, presents, gift cards and other support. Find a Christmas toy giveaway.

Search for

Catholic Charities social services

Applicants will normally be assigned either a case or social worker. This is done as the Catholic Charities near you wants to partner with the client to stabilize their situation. This process will involve the client and social worker partnering together to address everything from employment to budgeting, parenting classes, credit repair services and much more. The charity can help the poor get back on track or work to rehouse the homeless.

Counseling, including refugee services, immigration, assistance for pregnancy, adoption, and more. This form of outreach is one of the main social services available. The free counseling sessions are used to empower the client. Catholic Charities also has a focus on overall family development, whether that is for pregnant moms to be or immigrants to the area. There are also referrals given too, including details on how to find help for immigrants or other vulnerable groups.

Search for

Catholic Charity immigration programs

are available. They help refugees, migrant workers, people seeking asylum and newcomers with a wide variety of needs. There is help for housing, pro bono lawyes that assist with legal needs such as documentation or work papers, relocation of immigrants and so much more. The goal of Catholic Charities is to help immigrants stay housed, fed, and address legal needs too. More on pro bono lawyers for immigrants from Catholic Charities.

Yahoo! Search

Ad Lifestyle Insights

Employment services, including career counseling and resume review, are provided to almost 100,000 people per year by Catholic Charities. Social workers and case managers from Catholic Charities know that finding a job and increasing a client's skills and income is key to becoming self-sufficient.

Locations of Catholic Charities near you and phone numbers

There are thousands of locations around the country, however the main regional offices as well as telephone numbers for assistance are noted below. Whether it is free clothes, food, or health care, or financial help, assistance is offered to the low-income, homeless, and struggling.

If a center isn't in your town or city then call a nearby Catholic Charity organization near you or try a church. Many cover nearby counties or they may have information on other churches or organizations in your immediate area.

Alabama

Baldwin Alabama Catholic Charities

Immigrants, seniors, families with children and the poor can receive aid including food, utility help, and more. Continue with Baldwin County.

Catholic Social Services, Birmingham

2121 3rd Avenue North

Birmingham, Alabama 35203

Phone number - (205) 838-8316. Or more on Catholic Charities Birmingham programs.



Catholic Social Services, Mobile

Primary address: 400 Government Street

Mobile, AL 36602

Call - (251) 434-1550, or click here for details on Mobile Catholic Charities assistance programs.

Alaska

Catholic Social Services, Anchorage

3710 East 20th Avenue

Anchorage, Alaska 99508

Telephone number is (907) 276-5590. Read more on Catholic Charities Alaska.

Catholic Community Service, Juneau - (907) 586-9018

Arizona

Catholic Charities Community Services, Phoenix

Primary address - 4747 North 7th Avenue

Phoenix, Arizona

Dial for help and hours - (602) 285-1999. Get information assistance programs, including those from Catholic Charities in Phoenix and Mesa area.

Foundation for Senior Living, Phoenix

1201 East Thomas Road

Phoenix, Arizona 85014

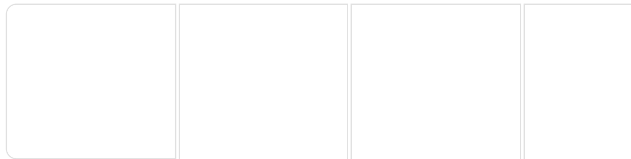
Call (602) 285-1800

Catholic Community Services of Southern AZ, Inc.

1023 North Tyndall Avenue

Tucson, Arizona 85719

Telephone number is (520) 624-6452. As indicated, a large territory is supported. Get referrals to public aid, food pantries, thrift stores, and limited amounts of emergency cash assistance for bills. Immigrants and refugees are supported too. Continue with Pima County.



Femme Fatale Offers

Temu

The entire **Southeastern Arizona region** has access to churches and Catholic Charity assistance programs. Various financial assistance programs are offered. [Click here](#) Catholic Charities Southeast Arizona assistance programs.

California

Catholic Charities - Diocese of Fresno. Call (559) 237-0851, or read more and the services offered and how to get help from Kern and Fresno County Catholic Charities.

The coast is also supported by churches and centers as well. Get details on Monterey County Catholic Charities assistance programs.

Catholic Charities of Los Angeles

307 Warren Street

Telephone number is (323) 266-3130

1531 West 9th Street

(213) 251-3400

Several centers are available in southern California. Various emergency assistance programs (rent, food, utilities), job training programs, food, and immigration services are offered. The three sites include:

Long Beach.

Los Angeles County

Ventura County is supported too. More on help from Ventura County Catholic Charities.

Catholic Charities of the Diocese of Monterey, Seaside - 831-393-3110

Catholic Charities of the East Bay / Oakland

433 Jefferson Street

Oakland, California 94607

Call (510) 768-3100 for help. Or find more Alameda County and Catholic Charity Oakland programs.

Catholic Charities of Orange County, Santa Ana California

Read more on programs administered at Orange County Catholic Charities.

Catholic Charities of Sacramento, Inc.

Partners with many non-profits and churches in northern California. Meals, shelter, housing, rental assistance, and much more can be offered to the needy by this Sacramento location.

Catholic Charities, San Bernardino

Address: 1800 Western Ave # 107

San Bernardino, California 92411

Telephone number - (909) 880-3625. The location also covers Riverside. Find details on Riverside and San Bernardino County Catholic Charities emergency assistance programs.

Catholic Charities, San Diego

4575 Mission Gorge Pl # A

San Diego, California

Dial (619) 287-9454 to get information on resources available. However it can include vouchers for food or clothing, emergency funds for rent (if being evicted) or utilities (if shut off). Continue reading on San Diego County.

Catholic Charities CYO, San Francisco

180 Howard St #100

San Francisco, CA 94105

(415) 972-1200

A focus of this agency is on addressing housing, homelessness, and evictions. Self-sufficiency, employment services and more may be available. More information San Francisco Catholic Charities assistance.

Santa Barbara County and nearby towns are covered as well. Various churches and groups partner with Catholic Charities. Continue with Santa Barbara County.

Catholic Charities of Santa Clara County

Address: 2625 Zanker Rd # 200

San Jose, California 95134

Main number - (408) 468-0100

Addressing the housing and nutritional needs of northern California residents is a focus. Information is also offered for job training and immigration services. Read more Santa Clara County Catholic Charities.

Catholic Charities, Santa Rosa

987 Airway Court

Santa Rosa, California

Main number is (707) 528-8712

Resources are offered for the entire county. Get more details on Catholic Charities in Sonoma.

Catholic Charities of Stockton

1106 North El Dorado Street

Stockton, CA 95202

(209) 444-5900. Click more Stanislaus County Catholic Charity programs.

Colorado

Boulder County. More information on Catholic Charities Boulder County.

Catholic Charities of Central Colorado

14 West Bijou Street

Colorado Springs, Colorado

Telephone - (719) 475-7314

Catholic Charities Archdiocese of Denver

Address: 4045 Pecos Street, Denver, Colorado

Please call 720-377-1313 from Monday - Friday 8:00 - 8:45 AM to make an appointment. Click here for details on Catholic Charities Denver County.

El Paso County area

Catholic Charities help migrant workers, the unemployed and working poor. Whether financial aid,

clothes, food or basic needs from thrift stores, help is offered. Continue with emergency help El Paso Colorado Catholic Charities.

Catholic Charities Diocese of Pueblo. Get information on their services from Pueblo Catholic Charities.

Connecticut

Catholic Charities of Fairfield County, Inc. Bridgeport CT. Telephone 203.416.1503
All of Fairfield County is supported. More information on Catholic Charities Fairfield County.

Catholic Charities Archdiocese of Hartford

839 Asylum Ave # 841
Hartford, CT
(860) 493-1841. Click here for additional information on assistance from Catholic Charities in Hartford.

Catholic Charities, Diocese of Norwich, Inc.

331 Main Street
Norwich, Connecticut
(860) 889-8346
Read more on locations in the region and the programs they offer, including in New London and Middlesex.

Delaware

Catholic Charities Inc., Diocese of Wilmington DE, call 302-764-2717. Read more on Delaware Catholic Charity assistance programs.

District of Columbia

Catholic Charities of the Archdiocese of Washington DC

924 G Street Northwest
Washington, DC
Telephone number is (202) 772-4300. Click for information on Washington DC Catholic Charities.

Florida

Catholic Charities Bureau, Inc., St. Augustine Jacksonville, Florida. Assistance programs are offered to residents of all of Duval County. Find immigration support, free referrals, emergency rent and utility bill help and more. More Jacksonville and Duval County area assistance programs.

Catholic Charities of Central Florida

1819 North Semoran Boulevard Orlando, FL 32807
Dial - (407) 658-1818. Priority is for seniors, parents with children, and other low income families in the Orange County region. Funds for cooling bills, food, school supplies, clothing and more is distributed. More on Orlando.

Columbia County region Catholic Charity supports the county and surrounding region, such as Lafayette and Hamilton. Call (386) 754-9180, or learn more Columbia County FL Catholic Charities resources.

Dade County

The organization helps the low income and needy in southern Florida. Find Miami - Dade locations.

Catholic Charities of NW Florida

1815 North 6th Avenue
Pensacola, Florida
(850) 436-6411. Find more information on Tallahassee area Catholic Charities.

Catholic Charities, Inc. Palm Beach, FL, Palm Beach Gardens. Click here Catholic Charities Palm Beach County

Polk County Florida and east to Brevard

Seniors and the working poor in the greater Florida region have access to several centers if they need help. Read more Catholic Charities assistance programs Brevard and Polk County.

Naples regional Catholic Charities

A few centers are in the area. Learn more on Collier County Catholic Charities.

Pasco County. Find details on help from Pasco County FL Catholic Charities.

Catholic Charities Diocese of St. Petersburg, Inc.

Main address: 1213 16th St. N.
Saint Petersburg, Florida 33705
Find more assistance in Pinellas County and St. Petersburg.

Sarasota, southwest Florida and Lee County

In addition to help for the low income, churches in Florida also have many programs for seniors. Find Lee County Catholic Charity locations and other centers in the southwestern part of the state. Or get help in Sarasota.

Tampa Bay and Hillsborough Florida

Programs include food, housing, referrals, and assistance for immigrants. Read about financial help, immigration services and support from Catholic Charities Hillsborough County.

Catholic Charities, Diocese of Venice, Inc. - This is a Florida organization. Dial 941-484-9543

Volusia, Flagler, St. Johns and eastern Florida

Several Catholic Charity churches and resources focus on this region. If you need food, are faced with eviction / homelessness, or need emergency help, then find who to contact in the St. Johns County region.

There are also emergency services in the **Daytona Beach region**. Catholic Charities may arrange grants for families in a crisis, car repairs, address unexpected medical expenses, and other aid. Find details on Catholic Charities in Volusia County.

Georgia**Catholic Charities Atlanta**

Office location is 680 West Peachtree Street Northwest
Atlanta, GA 30308
Call (404) 881-6571, or read more on Catholic Charities Atlanta area.

Catholic Social Services, Savannah - Telephone (912) 201-4100

Hawaii**Catholic Charities Hawaii**

1822 Keeaumoku St
Honolulu, HI 96822
Call (808) 524-4673. Provides referrals across the state. More on Catholic Charities Hawaii.

Idaho

Catholic Charities of Idaho, Boise (phone (208) 345-6031)
No matter what town, county, or city you live in, dial this center for referrals and information. Continue with Catholic Charities in Idaho.

Illinois**Catholic Charities of Chicago**

721 North La Salle Drive
Chicago, IL
312-655-7700

There are several other centers in the Cook County region that help the low income with paying rent, utilities, and medications. Find more Chicago Catholic Charity locations.

Catholic Charities, Joliet

Address: 203 North Ottawa Street
Joliet, Illinois
(815) 723-0582
Locations also serve the low income in Dupage and Will County.

Lake County and Chicago suburbs residents are also supported by Catholic Charities. Employment resources, immigration services, holiday and financial assistance are all offered. More on Lake County Catholic charity assistance programs.

Kane, McHenry and Winnebago County Illinois and surrounding towns can get financial assistance, rent help, food, and more from their local Catholic Charities. Click here for more on Kane, Winnebago, and McHenry programs.

Catholic Charities of Macon, Sagamon Illinois and nearby regions. Continue with finding financial aid and social services from Catholic Charities Macon and Sagamon County.

Churches in Peoria County

The charity, some of which are Catholic and others are of a different religion, provide free food, baby formula and items to parents. There may also be various social services as well as financial support to the working poor, including seniors. Continue with Churches in Peoria and Tazewell..

Catholic Charities of Southern Illinois, Belleville, call (618) 235-9601

Southwestern Illinois

The region, including St. Clair and Pulaski County is supported by several charities. More on St. Clair County Catholic Charities.

Catholic Charities, Inc., Springfield, IL

1625 West Washington Street
Springfield, IL
(217) 546-2515

Indiana**Catholic Charities of Evansville, (812) 423-5456****Catholic Charities, Fort Wayne-South Bend**

15 East Washington Boulevard
Fort Wayne, Indiana
Telephone - (260) 422-5625. Continue with St. Joseph and Fort Bend.

Catholic Charities, Gary

Address: 40 Broadway Gary, Indiana 46402
Telephone number is (219) 886-3565. Case managers and volunteers serve the region of Lake County Indiana, and may have limited amounts of cash assistance for expenses such as heating bills or rent. More on Gary Catholic Charities.

Catholic Charities of the Archdiocese of Indianapolis, Inc. Several centers operate in Marion County and offer financial assistance for basic needs. More Catholic Charities Indianapolis.

Southwestern Indiana

Several counties in this part of the state are supported by Catholic Charity services. While financial aid is limited, social workers will try to help the needy. More on Catholic Charities Southwestern Illinois emergency assistance.

Iowa**Catholic Charities, Davenport - (563) 324-1911****Catholic Charities, Des Moines**

601 Grand Ave, Des Moines, IA 50309
Dial (515) 244-3761 for intake. Or click more details on Catholic Charity church assistance programs in Des Moines.

Catholic Charities, Dubuque

Primary address: 1229 Mount Loretta Ave
Dubuque, IA 52003
(563) 588-0558

Catholic Charities, Sioux City - (712) 252-4547**Kansas****Catholic Social Service, Dodge City**

Office address: 906 Central Avenue
Dodge City, KS 67801
Telephone: (620) 227-1562

Catholic Charities of Northeast Kansas, Overland Park, (913) 433-2100

Several counties are supported by this regional Catholic Charity Diocese. Dozens of services are administered. Learn more on emergency help from Northeast Kansas Catholic Charities.

Also get information on the Leavenworth region.

Catholic Charities of Salina, Inc., 888-468-6909

Southwest Kansas - Several emergency assistance programs and social services are administered. Learn more on help from Southwest Kansas Catholic Charities.

Churches in Wichita Kansas area. The charities have free food from a pantry, gasoline vouchers, Christmas programs are more for the region, including Sedgwick, Harvey, Butler and other counties. More on church assistance programs in Wichita.

Kentucky**Catholic Charities, Inc., Covington, KY**

3629 Church Street Covington, KY 41015
(859) 581-8974

The center supports multiple counties in northern Kentucky. Thousands of families receive assistance

from the charity every year. Learn more on assistance from Kenton Catholic Charity assistance programs.

Catholic Charities of Louisville, Inc.

This is the Kentucky center. Phone - (502) 636-92631. More on Jefferson County and Louisville.

Catholic Charities Diocese of Lexington

Address is 1310 West Main Street
Lexington, KY 40508
(859) 253-1993.

Churches offer a number of services, ranging from money for paying rent to free furniture, a free food bank, homeless shelters and more. Continue with Lexington Catholic Charities.

Catholic Charities of the Diocese of Owensboro, KY

Louisiana

Catholic Charities & Special Ministries, Alexandria, Louisiana

Phone number - (318) 445-6424

Catholic Charities of the Diocese of Baton Rouge

1900 South Acadian Thruway
Baton Rouge, Louisiana 70808

Call the location at (225) 336-8700 for hours and list of services, or find details on Baton Rouge assistance.

Catholic Charities, Houma-Thibodaux Louisiana, 985-876-0490. This center covers the entire parishes of both Terrebonne and Lafourche. Continue with Catholic Charities Terrebonne and Lafourche Parish.

Catholic Office of Justice and Peace, Lafayette, LA. Call (337) 261-5654. Find more details on Iberia and Lafayette Catholic Charities.

Catholic Charities Archdiocese of New Orleans

Call - (504) 523-3755. Housing, rent, food, vouchers for groceries, and more is available in New Orleans Louisiana.

Catholic Charities of Shreveport

Center is located at - 331 East 71st Street
Shreveport, LA 71106

(318) 828-1456. There may be emergency financial help, hot meals, legal support and social services, regardless of religion. Click additional details on this Shreveport and Caddo Parish Catholic Charity organization.

Catholic Charities of Southwest Louisiana, Lake Charles, main phone number 337-439-7436

This location supports over 20 parishes in the southern and western part of the state. Read more Catholic Charities southwest assistance programs.

Maine

Catholic Charities Maine, Portland. Telephone (207) 781-8550.

This is the main organization for anyone in the state of Maine to call. Get information on free food, emergency financial assistance, housing, and other services. Read Catholic Charities Maine assistance programs.

Maryland

Catholic Charities of the Archdiocese of Baltimore. Main number is 410.547.5490.

May have emergency assistance for bills. Other services include food, job training, and referrals. Find more details on the Baltimore agency.

Montgomery County. Additional services are provided to residents in this region. Social services, financial aid, and other services are offered in Montgomery County Maryland.

Massachusetts

Catholic Charities - Boston

51 Sleeper Street
Boston, Massachusetts 02210

Telephone - (617) 482-5440. Click here Boston Catholic Charities.

Essex County and northern Massachusetts

The region, including Lawrence families, can receive help if they meet requirement. Click Essex County Catholic Charities.

Catholic Social Services, Fall River

Address is 1600 Bay Street

Fall River, MA 02724

(508) 674-4681

The churches and Catholic Charity organization provide assistance to all of southern Massachusetts, including Bristol, Barnstable and nearby counties. They help the poor, non-English speakers, unemployed and others. Continue with Bristol and Barnstable Catholic Charities assistance programs.

Catholic Charities, Springfield, MA

Location - 254 Bridge Street

Springfield, Massachusetts 01103

(413) 452-0605

Catholic Charities Worcester County

10 Hammond Street

Worcester, MA 01610

Call (508) 798-0191, or continue reading on Catholic Charities Worcester.

Michigan**Charities in Ann Arbor and Washtenaw region**

Assistance, including meals, case management, rent help, and more is offered. Continue with Catholic Charities Washtenaw County programs.

Catholic Social Action SE Michigan and Detroit

Programs are offered in multiple counties, including Lapeer, Macomb, Monroe, Oakland, St. Clair and Wayne.

Call 855-882-2736 or (313) 883-2100

There are assistance programs for women or immigrants, including free legal clinics. Or get referrals to income support benefits, free food or meals and other support. More on SE Michigan Catholic Charities.

Catholic Family Services, Kalamazoo

Address is 1819 Gull Road

Kalamazoo, Michigan 49048

Phone number is (269) 381-9800

Catholic Charities of Shiawassee and Genesee Counties

Call this non-profit for referrals and assistance. More on Flint Catholic Charity programs.

Catholic Charities of the Upper Peninsula, Marquette**Catholic Charities West Michigan**

Primary address: 40 Jefferson Ave SE

Grand Rapids, Michigan 49503

Dial the center at (616) 551-4747, or click here for details on Kent County Catholic Charities assistance programs.

Minnesota**Catholic Charities of St. Paul and Minneapolis**

Click here for phone numbers, addresses, and information on their financial assistance programs. There is a low cost thrift store, free winter coats, elder care and other help, including for immigrants. More on Catholic Charities Minneapolis.

Catholic Charities of the Diocese of New Ulm Minnesota. Telephone 1-(866) 670-5163

Ramsey County also has churches focused just on that county. The main center offers transitional housing, financial aid, and other support to the working poor. Find details on Catholic Charities in Ramsey County.

Catholic Charities, Saint Cloud - (320)229-4563**Catholic Charities, Winona Minnesota.** Telephone (507) 454-2270

Mississippi

Catholic Social & Community Services, Biloxi

Primary center location is 1790 Popps Ferry Road

Biloxi, MS

Call (228) 702-2100

Programs are available across southern Mississippi. Free food, energy bill assistance, rent help, and more is available. Read more on Southern Mississippi Catholic Charities assistance programs.

Catholic Charities Diocese of Jackson, Mississippi

North Congress Street

Jackson, MS 39201

Phone - (601) 355-8634

Missouri

Catholic Charities of Kansas City-St. Joseph Inc.

1112 Broadway Street

Kansas City, MO 64105

Dial (816) 221-4377.

Whether housing, money to pay energy or water bills, or assistance for pregnant women, help is offered.

More details on assistance from Kansas City Catholic Charity assistance programs.

Catholic Charities of Central & Northern Missouri, Jefferson City, telephone 573-634-8568

Catholic Charities of Southern Missouri, Springfield, (417) 866-0841. Additional details

Southwestern Missouri Catholic Charities.

Catholic Charities of St. Louis

4532 Lindell Boulevard

St. Louis, Missouri 63108

(314) 367-5500. Click details St. Louis Catholic Charities assistance programs.

Montana

Catholic Social Services of Montana, Helena

1301 11th Avenue

Helena, MT 59601

Location is (406) 442-4130

Nebraska

Lancaster and all of southern Nebraska

A number of resources are offered. Click here Lancaster area Catholic Charities assistance programs.

Catholic Charities, Omaha

3300 North 60th Street

Omaha, NE

Primary phone number. (402) 554-0520 Call to speak to a representative.

Nevada

Catholic Charities of Southern Nevada

Address of center is 451 East Twain Avenue

Las Vegas, Nevada 89169

Dial (702) 735-4358 for information. Homeless To Home program provides assistance to the homeless or about to be evicted. It offers assistance with housing, utility payments, case management, job training resources, food, clothing and to gain self-sufficiency through employment. Continue to get more details on Las Vegas resources.

Catholic Community Services of Northern Nevada, Reno. Spiritual guidance, referrals, utility bill assistance, and low income housing may be available, as funding and donations allow. More Reno Catholic Charities.

New Hampshire

The southern part of the state is supported by Catholic Charities. A number of human services are provided to seniors and the less fortunate More Rockingham and Hillsborough County.

New Jersey

Catholic Charities, Camden

1845 Haddon Avenue

Camden, New Jersey

(856) 342-4100, or click here for information on their services. There are many social services offered by the Camden Catholic Charities assistance programs.

Jersey City area

This location serves all of Hudson County with both financial aid and programs such as workforce development. Read more on Hudson County Catholic Charities.

Catholic Charities of Metuchen, Perth Amboy, 1-732-324-8200**Catholic Charities of the Archdiocese of Newark, NJ and northern New Jersey**

Address is 590 North 7th Street

Newark, NJ 07107

(973) 482-5759

If you live in the northern part of the state, this agency may be able to assist. More on Bergen and Essex County Catholic Charities.

Catholic Charities of the Diocese of Paterson

Address: 24 De Grasse Street

Paterson, New Jersey

Telephone number to dial for services is (973) 279-7100.

Or find more details on Catholic Charity church services in Passaic County.

Catholic Charities, Diocese of Trenton

383 West State Street

Trenton, New Jersey

Call the center at (609) 394-0346. The center also assists low income families in Burlington, Ocean, and other areas. Continue with Catholic Charities Burlington, Mercer, and Ocean County.

In addition to the location above, a number of churches and charities operate across the **central portion of the state**. Get information on locations in Somerset, Warren, and nearby counties that can provide food, financial assistance, and other aid.

Union County Diocese

Some of the assistance programs include emergency food and transitional housing. Other Catholic Charity services in the region include job training, GED testing and educational support, and help for senior citizens. Click more information Union County Catholic Charities.

New Mexico**Catholic Charities-Diocese of Las Cruces - (575) 523-7577****Catholic Charities, Santa Fe, Albuquerque**

They help refugees and immigrants too, including undocumented. Find Albuquerque locations.

Sandoval County region

Low income programs, assistance for immigrants and more is provided by Catholic Charities.

San Juan region of New Mexico supports several counties with various social services. More on San Juan area Catholic Charity church programs.

New York**Catholic Charities, Albany New York**

Address is 40 N Main Ave # 3

Phone number - (518) 453-6650. The entire Capital region is supported, including cities such as Troy and Schenectady. More details on Catholic Charities Albany area.

Catholic Charities of Brooklyn and Queens

Location is 1615 8th Ave # 1

Brooklyn, New York

(718) 722-6079

Flushing 6120 Woodside Avenue, NY 11377

Call (718) 779-1234

There are a couple locations as noted above. Immigrants can get help, and there are programs for the homeless. Or find vouchers for clothes or medications, as well as financial help. Click more details on Catholic Charities Queens and Brooklyn area.

Broome County, Owego, and Binghamton - Find programs in Broome County.

Catholic Charities of Buffalo

525 Washington Street

Phone number - (716) 856-4494. Or read more on Buffalo Catholic Charity programs.

Catholic Charities Chemung and Schuyler region

Resources are provided across the southern and the SW part of the state. More on Schuyler and Chemung County.

Chenango, Cortland, and the southern tier Catholic Charities supports the poor across the entire southern part of New York. Continue with Cortland and Chenango County.

Finger Lakes New York region, including Seneca and Cayuga Counties

The diocese supports several towns and nearby villages and regions. Read about Catholic Charities Seneca and Cayuga County.

Fulton and Oswego New York has several churches and Catholic Charity centers as well. Food, funds for energy bills, and immigration services may be offered. Read more on Oswego County Catholic Charities assistance programs.

Long Island

Residents of this region can get help from Nassau and Suffolk County centers. Learn about clothing, free Christmas assistance, and emergency funds for basic needs.

Catholic Charities of New York City

34 West 134th Street

Phone number - (212) 694-3939

Second location at 4111 Broadway

(212) 795-6860

In addition to those two centers, many other churches and charities operate in NYC. Qualified low income families, seniors, and children can get help. Assistance includes referrals, limited financial assistance, food, shelter, and a hot meal. More New York City Catholic Charity programs.

Ontario, Wayne County and nearby towns around the Finger Lakes region. More on help from Catholic Charities Finger Lakes.

Catholic Charities, Ogdensburg, NY

Resources administered include free food, emergency rental funds, case management, and employment services. Several nearby counties are supported too. Continue with Ogdensburg Catholic Charity programs.

Orange County New York. Click more details on assistance from Orange County NY Catholic Charities.

Catholic Charities of the Diocese of Rockville Centre, Hicksville. New York based. Call 516-733-7000

Catholic Charities, Rochester

1945 E Ridge Rd # 24

Rochester, New York

(585) 339-9800.

Call to apply for financial help for rent, mortgages, utilities, etc. or free basic needs. Learn more on Monroe County.

Rockland County New York Catholic Charities - Click here Catholic Charities Rockland County.

Catholic Charities of Syracuse

Address: 1654 West Onondaga Street

Syracuse, New York 13204

Phone: 315.424.1800. Continue for details on Catholic Charities Onondaga County.

The **charity also covers the regions between Albany and Syracuse**. Find Oneida and Madison County assistance programs that are administered by Catholic Charities.

Westchester County region. The charity offers a number of social services. Read more Westchester County.

Western New York Catholic Charities

Call this agency for help with heating bills, housing programs, and food. Ongoing case management may be administered too. Continue with Cattaraugus and Chautauqua regional programs.

North Carolina

Catholic Social Services, Mecklenburg County. The churches in the region help the poor, Latino and those in need. More on Charlotte, NC and Mecklenburg County.

Catholic Charities of Diocese of Raleigh, North Carolina. May also support nearby regions such as Durham and Johnston County. Continue Catholic Charities Wake County.

Wilmington and southeastern North Carolina

Churches and charities support many counties in the region. Call for information on utility bill and rent assistance, job counseling, Christmas assistance, and more. Find details churches in Wilmington.

North Dakota

Catholic Charities of North Dakota. There are several offices in the state that offer referrals. Call (701) 235-4457 for intake, or find more details on North Dakota Catholic Charities.

Ohio

Catholic Social Services - Miami Valley, Cincinnati is at 922 West Riverview Avenue, Dayton, Ohio 45402. Telephone - (937) 223-7217.

There is also **Catholic Charities of Southwestern Ohio, Cincinnati**. Address: 100 E 8th St # 5, Cincinnati, Ohio 45202. Telephone: (513) 241-7745.

Food, heating assistance, help for seniors and other aid is available. Services offered include employment, holiday assistance, emergency rent and housing and more. [Click here](#) assistance from Hamilton County Catholic Charities. More Catholic Charities Hamilton County assistance programs.

Catholic Charities Health and Human Services

7911 Detroit Avenue

Cleveland, Ohio 44102

Call the center at (216) 334-2978, or [click here](#) Catholic Charities Cleveland.

Catholic Social Services, Columbus, OH

197 East Gay Street

Columbus, Ohio

Phone number to dial for help is (614) 221-5891. Programs include senior assistance, food, immigration services, and financial help. Continue reading on Columbus Ohio resources.

Lake County and Painesville. Read more on Lake County Ohio.

Catholic Charities of Steubenville, Inc., (740) 282-3631

Summit County and Akron

Other locations operate in Ohio, including in Akron and Summit County.

Catholic Charities, Toledo

933 Spielbusch Avenue

Toledo, Ohio 43604

(419) 244-6711

This agency supports people in Lucas and Toledo Counties in Ohio, and maybe other regions. Hot meals, information on government assistance, and maybe some funds for rent or energy bills may be offered. More on Toledo Catholic Charities.

Catholic Charities Diocese of Youngstown, Ohio, (330) 393-4254. See Mahoning Catholic Charities.

Oklahoma

Catholic Charities, Oklahoma City

Address: 1501 North Classen Boulevard

Oklahoma City, OK 73106

Dial (405) 523-3012 to get hours and speak to a social worker. Find more details on Catholic Charity assistance programs in Oklahoma City.

Tulsa County Oklahoma

Assistance, referrals and other aid is available. More Tulsa Catholic Charities.

Oregon

Catholic Charities and Churches in Clackamas

Numerous social services and low income assistance programs are offered. They range from employment assistance to free food and meals for children in Oregon. More on Clackamas County.

Eugene and Lane County

The non-profit helps the low income and seniors in the region. Additional details on Catholic Charities Lane County.

Catholic Charities of Portland, OR

2740 SE Powell Blvd

Main number is (503) 231-4866. Find more details on Multnomah County Catholic Charities.

Pennsylvania

Catholic Charities Diocese of Allentown Pennsylvania

The location supports Lehigh, Northampton and other areas. More on Lehigh County Catholic Charity.

Catholic Charities of the Diocese of Altoona-Johnstown Pennsylvania - (814) 695-5579

Beaver County

Several social services and other programs are administered. More on Beaver County Catholic Charities assistance.

Blair, Cambria, and central PA

Numerous programs are offered for the low income and poor. [Click here](#) Cambria and Blair County

Catholic Charity programs.

Catholic Charities Agency, Inc., Greensburg - Westmoreland, PA

Call (724) 837-1840. Learn more on Catholic Charity emergency help in Greensburg area.

Catholic Charities, Harrisburg

Administration Office is 4800 Union Deposit Road

Harrisburg, PA 17111

Phone 717-657-4804. Has a shelter but not financial assistance.

Catholic Charities Lackawanna and Luzerne - This agency covers nearby counties as well. Find details on Lackawanna and Luzerne County Catholic Charity resources.

Montgomery County residents can turn to the Philadelphia churches and centers (per below) or Catholic Charities has operations in their own county. More on Montgomery County.

Catholic Human Services, Philadelphia

Shelter is offered during the winter, as well as access to emergency funds for heating bills. Case managers can help families meet their nutritional needs. Also learn about basic health care, medications, and other support. More on Philadelphia Catholic Charities.

Catholic Charities, Pittsburgh

212 9th St # 1000

Pittsburgh, Pennsylvania

Phone number is (412) 456-6960. Emergency assistance and low income programs are offered in all of Allegheny County. Find where to get help in Pittsburgh.

Catholic Social Services of Diocese of Scranton, Wilkes Barre - Phone 570-822-7118

Rhode Island

Social Ministry Secretariat, Providence

This location supports all of Rhode Island. Click more Providence Catholic Charities.

South Carolina

Catholic Charities of Charleston, SC. (843) 402-9115

The coastal branch assists Berkeley, Charleston and Dorchester families with basic needs including food, dental care, vision check ups, and other financial support. Click here Catholic Charities Charleston SC.

Greenville County region, including central and northern part of the state, has several churches and Catholic Charity agencies. Emergency financial aid, free food, and care for seniors is offered. Continue with Greenville and Anderson County.

Midlands - Almost 20 counties are supported by this location, including York, Orangeburg, Bamberg and surrounding the region. Find details on churches in Midland assistance programs.

Pee Dee / Myrtle Beach Coastal area. This branch supports the region around Georgetown, Horry County, and Dillon. Everything from free items for moms and babies from the Children Ministry to food and more is provided. More details on Catholic Charities Pee Dee.

Piedmont region - Almost 20 different counties around Spartanburg, the city of Greenville, Oconee, Laurens and nearby towns and cities are supported. There may be some funds for bills in a crisis, help for immigrants, credit counseling and other support. More on Piedmont Catholic Charity programs. South Dakota

Tennessee

Catholic Charities of East Tennessee, Inc., Knoxville

119 Dameron Ave, (865) 971-3570

Low income families in nearby eastern Tennessee can also call this location. Continue with assistance from Knoxville Catholic Charities

Catholic Charities of Davidson County and Tennessee, Inc.

21 White Bridge Road

Nashville, TN

Call (615) 353-6792, or get additional details on Nashville and Davidson County.

Catholic Charities, West Tennessee, Memphis

1325 Jefferson Avenue

Memphis, TN 38104

Call (901) 373-1200, or find more on Shelby County and Memphis Catholic Charity assistance.

Texas

Catholic Family Service Charities of Panhandle and Amarillo, Texas

Residents of the western portion of the state can also get help from the Panhandle area churches and locations. Various emergency assistance programs, immigration programs, food, and medical care can be arranged. Continue with Potter County Catholic Charities.

Catholic Social Services, Brownsville, San Juan Texas. Dial (956) 541-0220 for information on the services offered.

Catholic Charities of Central Texas, Austin

Location - 1625 Rutherford Ln Austin, TX 78754

Telephone - (512) 651-6100

This non-profit provides financial assistance and more to all of Travis County. More on Austin Catholic Charities

Catholic Charities of Corpus Christi, Texas, dial (361) 884-0651 for intake.

Catholic Charities of Dallas

9461 Lyndon B Johnson Freeway #128

Dallas, Texas 75243

Primary phone number is 214-520-6590.

Churches in Eastern Texas, Tyler and surrounding areas

This group of churches and charities provides assistance to several counties, including Montgomery and Taylor Texas. Food, energy assistance, housing and more is offered. More East Texas Catholic Charity programs.

Catholic Charities of Fort Worth

249 Thornhill Drive

Fort Worth, Texas 76115

Phone number is (817) 534-0814. Food, Spanish seeking serves, information, and referrals are offered. More on Fort Worth.

Catholic Charities of the Archdiocese of Galveston and Houston

Location is 2900 Louisiana Street

Houston, TX

(713) 526-4611

The second branch is located at 326 South Jensen Drive

Houston, Texas

Main number is (713) 227-9981. This centers serve the working poor, seniors, and low income in the entire region. Assistance is in Spanish too. Get more details on Harris County Catholic Charity emergency resources.

Hidalgo and Cameron Counties are also supported.

Galveston and eastern Texas residents have access to their own center as well. The location may offer free meals, holiday assistance, and emergency rent and/or utility bill help. Click more details on Galveston and Fort Bend region.

Catholic Social Services, Laredo. A few locations operate in the region. Telephone (956) 722-2443

Catholic Charities, Diocese of Lubbock, Inc.

Address is 102 Avenue J. Telephone number - (806) 765-8475. Continue reading on Lubbock County resources

Catholic Charities Community Services, San Angelo Odessa

Telephone - (432) 332-1387. Click more details Odessa Catholic Charities.

Catholic Charities, San Antonio

202 West French Place

San Antonio, Texas

Telephone number - (210) 222-1294. No matter where you live in Bexar County, if you meet income and other qualifications you and/or your family may qualify for assistance. More on San Antonio Catholic Charities.

Catholic Charities of Southeast Texas

2780 Eastex Freeway

Beaumont, TX 77703

(409) 835-7118

Utah

Catholic Community Services of Utah

745 East 300 South

Salt Lake City, Utah 84102

(801) 977-9119. Continue for more information on Salt Lake City Catholic Charity emergency financial assistance.

Vermont

Vermont Catholic Charities, Burlington

55 Joy Drive

South Burlington, Vermont 05401

Telephone number is (802) 658-6111

This charity supports the entire state of Vermont. Assistance is offered for seniors, low income families, the jobless and others. Click [here](#) for Vermont Catholic Charities.

Virginia

Catholic Charities of the Diocese of Arlington, Inc.

Address: 200 N. Glebe Road Suite 250

Arlington, Virginia 22203

703-841-2531

Catholic Charities of Eastern Virginia and Virginia Beach

269 Clearfield Avenue

Virginia Beach, VA 23462

Call location at (757) 490-4931, or find more Hampton Roads locations.

Commonwealth Catholic Charities, Richmond

1512 Willow Lawn Drive

Richmond, Virginia 23230

Call (804) 285-5900

This center supports the central and eastern Virginia regions with emergency assistance and social services. Read more on Richmond Catholic Charities programs.

Northern Virginia is served by the Fairfax County branch. Or another nearby locations is in Stafford and the Spotsylvania region.

Roanoke Virginia Catholic Charities is a leading non-profit for the region. More on Roanoke Catholic Charities.

Washington State

Clark County and southern Washington

Several social services are administered. More details on Clark County Washington.

King County and Seattle

Various resources are offered, with a focus on the disabled, seniors, and working poor. Some may pay utilities or cover employment expenses, or there is free groceries, bus tickets and more. Locate details on Seattle and King County Catholic Charity assistance programs.

Kitsap Washington

Several churches partner with Catholic Charities to help the poor and seniors in the region, including Jefferson County. Click [here](#) Kitsap and Jefferson County.

Catholic Charities of Eastern Washington - Spokane

12 East 5th Avenue

Spokane, Washington 99202

(509) 358-4250 or the Homeless Assessment number is 509-325-5005

Communities across eastern Washington are supported by this church based group and its assistance programs. More on Spokane area Catholic Charities.

Tacoma and Pierce County has a Catholic Charity organization. Basic needs from a thrift store are provided along with referrals to food, grants, and other support. Click [more information](#) Tacoma and Pierce County Catholic Charities.

Thurston County

Low income families can receive support including food, referrals, case management, and information on job programs. Learn more on Thurston County Catholic Charities.

Catholic Charities Diocese of Yakima Washington. Dial (509) 965-7100.

West Virginia

Catholic Charities West Virginia, Inc.
2000 Main St.
Wheeling WV 26003
304-905-9860

The agency and its partners provide emergency assistance and resources across West Virginia, including in Charleston and other cities. Free job training or placements, health or dental care, some emergency funds for paying bills and other resources are offered. More on West Virginia Catholic Charities emergency assistance.

Wisconsin

Catholic Charities of The Diocese of Green Bay

Primary location is 1825 Riverside Drive
Green Bay, WI
(920) 272-8234

Catholic Charities, La Crosse, (608) 782-0710

Catholic Charities, Inc. Madison, Wisconsin

426 S Yellowstone Dr. Madison, WI 53719. Call (608) 833-4800 for hours. Food, help for seniors, clothing, and other basic needs are offered. Read Madison Catholic Charities.

Catholic Charities, Milwaukee

Address: 1919 North 60th Street
Milwaukee, WI

They do not offer financial aid, but other social services may be provided. Call (414) 771-2881 for information on resources offered. Or continue with Catholic Charities in Milwaukee.

Wyoming

Catholic Charities of Wyoming, Torrington - 1-800-788-4606

More Catholic charity churches and emergency assistance phone numbers

There are other Catholic Charity social service programs as well. The faith based charity supports anyone in need, whether they are immigrants, seniors, or a family going through a hardship. Get everything from housing or rent assistance to thrift stores, bill paying services, or low cost thrift stores and so much more. Find a list of additional locations to try for financial assistance.

Related Content From Needhelppayingbills.com

- Food pantry near you
- Financial help for pregnant women
- Funeral assistance for low-income families

By Jon McNamara

Additional Local Programs

Financial Help Near You

Rent Payment Assistance Near You

Free Food Near You

Utility Assistance Near You

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EXHIBIT Q



WORSHIP

WELCOME (/WELCOME)

WHAT WE BELIEVE (/WHAT-WE-BELIEVE)

SUNDAY SERVICE (/SUNDAY-SERVICE)

RECORDED SERMONS (/)

CHOIR (/CHOIR)

FELLOWSHIP (/FELLOWSHIP)

JOB OPPORTUNITY (/JOB-OPPORTUNITY)

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SERVE

COMMUNITY KITCHEN (/COMMUNITY-KITCHEN)

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MEMORIAL DAY HOSPITALITY EVENT (/MEMORIAL-DAY-HOSPITALITY-EVENT)

ENRICHMENT

MEN'S BIBLE STUDY (/MENS-PRAYER-BREAKFAST)

WOMEN'S BIBLE STUDY AND PRAYER (/WOMENS-PRAYER-BREAKFAST)

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**WHAT WE BELIEVE
(/WHAT-WE-BELIEVE)**

**SUNDAY SERVICE
(/SUNDAY-SERVICE)**

**RECORDED SERMONS
(/)**

CHOIR (/CHOIR)

**FELLOWSHIP
(/FELLOWSHIP)**

**JOB OPPORTUNITY
(/JOB-OPPORTUNITY)**

**CALENDAR
(/CALENDAR)**

June

Sun	Mon	Tue	Wed	Thu	Fri	Sat
				1 Noon Comm Kitchen	2 Noon Al-Anon	3
4 10:00am Worship 11:00am Fellowship	5 OFFICE CLOSED 6:00pm Al-Anon	6 8:00am Women's Bible Study/Prayer (WBSP)	7 8:00am Men's Bible Study (MBS) 1:00-3:00pm Child Evangelism 1:45pm Choir	8 10:30am Business & Finance Cte Noon Comm Kitchen 4:45pm Session	9 Noon Al-Anon	10
11 10:00am Worship 11:00am Fellowship	12 OFFICE CLOSED 6:00pm Al-Anon	13 8:00am WBSP 9:15am Mission Cte 10:15am Warship Cte	14 8:00am Men's Bible Study (MBS) 1:00-3:00pm Child Evangelism 1:45pm Choir	15 10:00am Deacons Noon Comm Kitchen 4:45pm Session	16 Noon Al-Anon 5:00pm Potluck/ Game Night	17
18 10:00am Worship 11:00am Fellowship	19 OFFICE CLOSED 6:00pm Al-Anon	20 8:00am WBSP	21 8:00am Men's Bible Study (MBS) 1:00-3:00pm Child Evangelism 1:45pm Choir	22 Noon Comm Kitchen 4:45pm Session	23 Noon Al-Anon	24 8:30-10:00am Co-Ed Family Prayer Breakfast
25 10:00am Worship 11:00am Fellowship	26 OFFICE CLOSED 6:00pm Al-Anon	27 8:00am WBSP	28 8:00am Men's Bible Study (MBS) 1:00-3:00pm Child Evangelism 1:45pm Choir	29 Noon Comm Kitchen	30 Noon Al-Anon	



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PAST EVENTS (/PAST-EVENTS)
MEDIA
PHOTO GALLERY (/PHOTO-GALLERY)
CHURCH HISTORY
CHURCH HISTORY (/CHURCH-HISTORY)
STAINED GLASS WINDOWS (/STAINED-GLASS-WINDOWS)
SANCTUARY BELL (/SANCTUARY-BELL)
MEMORIAL TREE (/MEMORIAL-TREE)
REMODEL (/REMODEL)

BROOKINGS PRESBYTERIAN CHURCH, 540 PACIFIC AVENUE,
BROOKINGS, OR, 97415, UNITED STATES 541-469-3725

Regular Sunday Schedule

10:00am Worship

11:00am Fellowship Time

Nursery Care is Available

Church Office Hours

Tuesday - Friday: 8 am - 1 pm

Office manager: Pat Van Ooyen

Pastor Bruce's Office Hours

Tuesday - Friday: 8 am - 1 pm

Available other times by
appointment

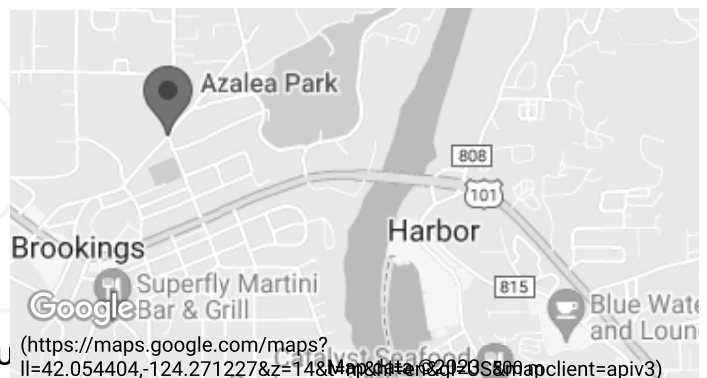
HOME
(/HOME)

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US)

PC U
(HTTP://WWW.PCUSA.ORG/)



(<http://www.pcusa.org/>)



(<https://maps.google.com/maps?ll=42.054404,-124.271227&z=14&mapdata=8202380&mapclient=apiv3>)

GIVING
([HTTPS://WWW.PCUSA.ORG/NEW-](https://www.pcusa.org/new-give/)
GIVE/)

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EXHIBIT R

Brookings Nazarene Community Care Ministry: Food Pantry

Our function: to support the community by partnering with the Brookings-Harbor Community Helpers (BHCH) – local Food Bank

- We fill the gaps to support the work of BHCH Food Bank – especially on days they do not distribute food (Tuesdays & Thursdays).
- It is not necessary for us to fill the bags with EVERY item that is “checked” by the client. We do the best we can – and within reason.
- Our guideline is 2 bags per person.
- It is not wise to over-pack each bag.
- We meet the food needs by stepping in before the client’s next visit to the BHCH Food Bank.
- We don’t turn anyone away, and they can return – but we need to have enough for all who come to us.

EXHIBIT S

Document title: Services Archive - Catholic Charities of Oregon

Capture URL: <https://www.catholiccharitiesoregon.org/services/>

Page loaded at (UTC): Tue, 27 Jun 2023 17:04:49 GMT

Capture timestamp (UTC): Tue, 27 Jun 2023 17:05:38 GMT

Capture tool: 10.24.3

Collection server IP: 3.90.170.83

Browser engine: Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/108.0.5359.215 Safari/537.36

Operating system: Windows_NT (Node 16.17.1)

PDF length: 4

Capture ID: vhwq8HVGvmavWLNBBB4MW

User: sr-dhall

SERVICES

Catholic Charities of Oregon achieves lasting solutions to poverty and injustice by partnering with clients to meet their economic and educational goals and to support their physical and social well-being. Explore our programs and services.



HEALTHY HOUSING

Catholic Charities of Oregon develops innovative solutions for some of our region's most pressing housing challenges.

[VIEW SERVICE →](#)


HOMELESS SERVICES

With the goal of transitioning to permanent housing, Catholic Charities of Oregon gives those living outside the resources and support they need to build lasting stability and self-sufficiency.

[VIEW SERVICE →](#)


IMMIGRATION LEGAL SERVICES

Founded in 1996, our Immigration Legal Services division works to protect individuals and maintain and reunify families in need.

[VIEW SERVICE →](#)


FAMILY SERVICES

In partnership with our clients, we provide an array of family supportive



REFUGEE SERVICES

Catholic Charities provides refugee resettlement and case management



FINANCIAL WELLNESS

Financial freedom starts by saving for tomorrow. Save First Financial Wellness

FAMILY SERVICES

In partnership with our clients, we provide an array of family supportive services including counseling, case management, and education.

[VIEW SERVICE →](#)

REFUGEE SERVICES

Catholic Charities provides refugee resettlement and case management services to individuals and families who seek to make Oregon their new home.

[VIEW SERVICE →](#)

FINANCIAL WELLNESS

Financial freedom starts by saving for tomorrow. Save First Financial Wellness offers services that are critical to weathering a financial crisis and attaining a healthy financial lifestyle.

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INTERCULTURAL COUNSELING CENTER

We regret to inform you, that the Intercultural Counseling Center at Catholic Charities is no longer operating as of April 28th, 2023. Lamentamos informarle que el Centro de Consejería Intercultural de Caridades Católicas ya no esta brindando servicios a partir del 28 de abril de 2023.

[VIEW SERVICE →](#)



DISASTER SERVICES

When disaster hits, people go from security to vulnerability overnight. With complete recovery as the ultimate goal, we work to help survivors of disasters rebuild their lives and communities with short-, medium-, and long-term strategies, responding with care and compassion for the whole person.

[VIEW SERVICE →](#)



AUXILIARY SERVICES

Catholic Charities of Oregon spearheads several initiatives to improve the quality of life of the people we serve and empower Oregon's communities to do the same. Learn more about our projects by clicking on the tiles below.

[VIEW SERVICE →](#)



FOOD SERVICES

As hunger and poverty in Oregon continue to rise, our Food Services program partners with local organizations to provide hot meals for those who are unsheltered and offers its own culinary workforce development training to help those experiencing barriers to



POPE FRANCIS CENTER

Our center for volunteerism provides meaningful opportunities for people to engage with Catholic Charities of Oregon and their communities. By giving their time and energy in service to others, volunteers help make our mission possible. Questions about volunteering?



FOOD SERVICES

As hunger and poverty in Oregon continue to rise, our Food Services program partners with local organizations to provide hot meals for those who are unsheltered and offers its own culinary workforce development training to help those experiencing barriers to employment regain their self-sufficiency and stability.

[VIEW SERVICE →](#)



POPE FRANCIS CENTER

Our center for volunteerism provides meaningful opportunities for people to engage with Catholic Charities of Oregon and their communities. By giving their time and energy in service to others, volunteers help make our mission possible. Questions about volunteering? Email volunteer@ccoregon.org or call the Volunteer Helpline at (503) 688-2536.

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EXHIBIT U

Document title: Homeless Services - Catholic Charities of Oregon

Capture URL: <https://www.catholiccharitiesoregon.org/services/homeless-services/>

Page loaded at (UTC): Tue, 27 Jun 2023 17:05:58 GMT

Capture timestamp (UTC): Tue, 27 Jun 2023 17:06:26 GMT

Capture tool: 10.24.3

Collection server IP: 3.90.170.83

Browser engine: Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/108.0.5359.215 Safari/537.36

Operating system: Windows_NT (Node 16.17.1)

PDF length: 5

Capture ID: uXvd56DfMeUXh5SZ2d7QQ3

User: sr-dhall



SERVICES > HOMELESS SERVICES

HOMELESS SERVI

With the goal of transitioning to permanent housing, Catholic Charities of Oregon gives those living outside the resources and support they need to build lasting stability and self-sufficiency.



CONTACT US

P. (971) 222-1880

E. HTPEMAIL@CCOREGON.ORG

VOLUNTEER

Join us in our work to help those experiencing houselessness regain their stability and independence.

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DONATE TO: HOMELESS SERVICES

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EMPOWERING OUR UNSHELTERED NEIGHBORS WITH COMPREHENSIVE CARE

WE GIVE THOSE IN NEED THE TOOLS THEY NEED FOR SELF-SUFFICIENCY

Our Homeless Services team removes barriers to finding permanent housing and wraps clients in a suite of supportive services as they work to re-establish their stability and independence. We offer case management, employment assistance, housing, drop-in services, community outreach, and more. Through our Kenton Women's Village, Housing Transitions Program, and Street Outreach team, we give those experiencing houselessness the comprehensive support and resources they need to move forward and thrive.

Explore our programs by clicking the tiles below.



HOUSING TRANSITIONS

The Housing Transitions Program (HTP) is a relationship-centered program that operates on the best practice Housing First model. We assist in removing barriers to permanent housing and provide housing services to self-identified women experiencing homelessness, who are at least 25 years old, and do not have any children in their care.

[VIEW SERVICE →](#)

KENTON WOMEN'S VILLAGE

Kenton Women's Village is a creative and collaborative project, offering a new approach for addressing houselessness at a small scale. The villagers are empowered, have a sense of purpose, and take daily steps toward permanent housing.

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JUN 20, 2023
PARENTS LEARN ONS AND OFFS OF CLOTH DIAPERS

JUN 16, 2023
JUNETEENTH

JUN 13, 2023
CONSTRUCTION STARTS ON 137 UNITS OF AFFORDABLE
HOUSING IN NORTHEAST PORTLAND

JUN 13, 2023
THE UNIQUE VISION OF A LEADING EXPERT ON GANG
INTERVENTION AND WHAT IT CAN MEAN FOR ALL OF
SOCIETY

ARTICLES

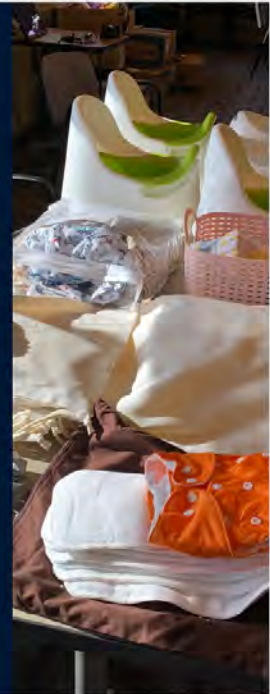
FEATURED

JUN 20, 2023

PARENTS LEARN ONS AND OFFS OF CLOTH DIAPERS

Urgent need: Baby wipes When young families go shopping, Catholic Charities of Oregon wants to make sure they don't need to choose between food and diapers. That's why the agency is grateful for the support of PDX Diaper Bank, which provides boxes of free diapers for families being helped by Catholic Charities' Refugee & Family...

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JUN 20, 2023
PARENTS LEARN ONS AND OFFS OF CLOTH DIAPERS

ARTICLES

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JUN 20, 2023

PARENTS LEARN ONS AND OFFS OF CLOTH DIAPERS

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JUN 16, 2023
JUNETEENTH

JUN 13, 2023
CONSTRUCTION STARTS ON 137 UNITS OF AFFORDABLE HOUSING IN NORTHEAST PORTLAND

JUN 13, 2023
THE UNIQUE VISION OF A LEADING EXPERT ON GANG INTERVENTION AND WHAT IT CAN MEAN FOR ALL OF SOCIETY



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EXHIBIT T

Document title: Auxiliary Services - Catholic Charities of Oregon

Capture URL: <https://www.catholiccharitiesoregon.org/services/auxiliary-services/>

Page loaded at (UTC): Tue, 27 Jun 2023 17:07:45 GMT

Capture timestamp (UTC): Tue, 27 Jun 2023 17:08:18 GMT

Capture tool: 10.24.3

Collection server IP: 3.90.170.83

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Operating system: Windows_NT (Node 16.17.1)

PDF length: 4

Capture ID: 88eSy83uN7SNQewRAi8bYu

User: sr-dhall



SERVICES > AUXILIARY SERVICES

AUXILIARY SERVI

Catholic Charities of Oregon spearheads several initiatives to improve the quality of life of the people we serve and empower Oregon's communities to do the same. Learn more about our projects by clicking on the tiles below.



CONTACT US

If you need assistance and do not see what you're looking for, please reach out to us.

P. (503) 231-4866

CONTACT →

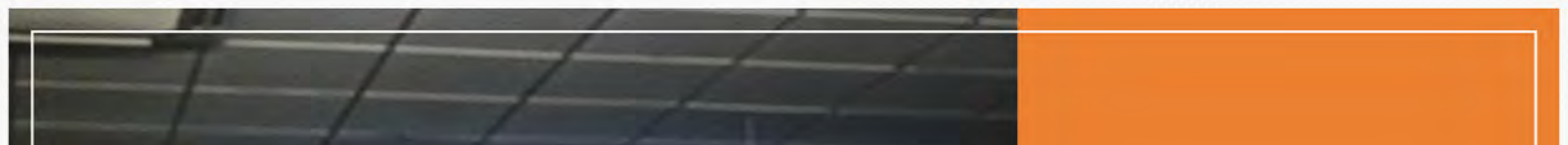
DONATE TO: CATHOLIC CHARITIES OF OREGON

GIVE TODAY

GIVING COMMUNITIES THE TOOLS TO THRIVE

OUR AUXILIARY SERVICES SUPPLEMENT OUR CORE WORK AND SUPPORT THOSE WHO MAY OTHERWISE FALL INTO POVERTY.

At Catholic Charities of Oregon, we are continuously evolving our services to meet the needs of those whom mainstream society has all but forgotten. Our Auxiliary Services allow us to be flexible and creative in our work to provide unique support to those living on the margins of poverty as they develop self-sufficiency and stability. Please explore our services by clicking the tiles below.



THE BORDER IS EVERYWHERE

In partnership with Catholic Charities USA, the United States Conference of Catholic Bishops (USCCB), and the Catholic Legal Immigration Network (CLINIC), Catholic Charities of Oregon supports access to wraparound services that promote the healthy integration and well-being of our newest neighbors as they start their lives in the United States.

[VIEW SERVICE →](#)

ZOMI COMMUNITY

The Zomi are a Christian ethnic minority group from Myanmar, Bangladesh, and India. Intense religious persecution in Myanmar has caused the resettlement of many Zomi to Portland as refugees.

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ZOMI COMMUNITY

The Zomi are a Christian ethnic minority group from Myanmar, Bangladesh, and India. Intense religious persecution in Myanmar has caused the resettlement of many Zomi to Portland as refugees.

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CINDRA D. GRAY
3105 N. Edgewood Ct.
Newberg, OR 97132
<cindragray@yahoo.com>

DATE: June 26, 2023

TO: Planning Commission, City of Brookings

FROM: Reverend Cindra Gray

RE: Public Comments in Planning Commission Docket APP-1-23
Appeal of Notice of Abatement to St. Timothy's Episcopal Church

Hello commissioners.

I am the deacon at St. Michael - San Miguel Episcopal Church in Newberg, Oregon, a town of about 25,000 residents a half hour southwest of Portland. I write in support of St. Timothy's appeal of the Notice of Abatement the city issued to the church. Please enter these comments in the record.

I believe it is an important mission of every church to help those in need as St. Timothy's has done in Brookings. At St. Michael - San Miguel in Newberg, we have tried to help those in need in a variety of ways over the years. For example, we have regularly hosted dental vans staffed by Medical Teams International to treat people for dental care at no cost. Also, we've hosted a free lunch program established by the Newberg School District to make sure children in the neighborhood receive lunch. The funding for the free lunch program comes from the Federal government, but we are able to stretch the District's budget by providing free space and unpaid volunteers for the program. We also offer a community garden for people to grow their own fruits and vegetables and for church members to grow food to donate to a local food bank for distribution for those in need in the community.

We believe that it is important for a church to help those in the community who might not otherwise be able to afford social services. That's what churches do and have done since Jesus showed us how to love each other.

Please grant St. Timothy's appeal.



Rev. Cindra Gray, Deacon

From: synergyemk@charter.net [mailto:synergyemk@charter.net]
Sent: Monday, June 26, 2023 6:24 PM
To: 'lziemer@brookings.or.us'
Subject: Comment Card and Letter for St. Timothy's Episcopal Church in Brookings

TO: Ms. Lauri Ziemer, Planning Tech and Planning Commissioners

FROM: Elli Kimbauer, MDiv., Psy.D.

DATE: June 26, 2023

RE: St. Timothy's Episcopal Church and Notice of Abatement

Dear Ms. Ziemer and Planning Commissioners:

I am writing to **strongly support the Appeal made by St. Timothy's Episcopal Church** that allows them to continue the social service ministries that are central to their mission in the community. Specifically, I am referring to the Day Program, the Advocacy Program, and the Legal Clinic they conduct throughout the week. I am writing from my own personal and professional experiences as a former Pastor and a Clinical Psychologist (retired). As both clergy and laity, **I have always been an advocate that the church is most effective and relevant to the community when there is a clear relationship between the spiritual, physical, mental, and life transitions in all aspects of a congregation's ministry.** I wish that every congregation's vision and mission integrated these dynamics in their activities the way St. Timothy's does! If we did, we would be truly addressing the needs of the whole person and fulfill our calling. **A congregation is supposed to be so much more than providing worship services a couple times a week!**

Since moving to Crescent City in 2003, I was very involved with a local congregation for about 8 years. I advocated that our Social Services Committee could combine with our Evangelism/Witness Committee. We could do so much more than hold services. In fact, a church can become self-serving and resemble more a “club” with “members, dues,” etc. **Our purpose is not just for the insiders! We are planted in a neighborhood so that we can share faith-in-action in our community.** I promoted the idea that Evangelism/Witness is not just about sharing our beliefs, but demonstrating our faith in concrete actions through providing Social Services of compassion, counsel, and guidance for the daily needs of individuals and families. Our focus as a church is intended to be outward to address the needs of many different kinds of people and their life circumstances!

With these principles in mind, I was able to start a 12-Step group at the church for both congregants and open to the public. It eventually turned into a 12-Step program where we could incorporate faith and recovery principles. I was available to donate time for pastoral counseling at the church. The church started a food pantry and provided food, hygiene items, and clothing. Faith-based materials were provided. There was interest in starting a tutoring program for neighborhood kids and a “meet and greet” dessert or meal for their families. In the churches I served as pastor, I always had a “Pastor's Discretionary Fund” to assist walk-in's who needed a couple gallons of gas, meal certificates to McDonald's or Subway, phone cards, bus fare, and/or hygiene items.

I politely request that you distribute copies to each of the planning commissioners before tomorrow night's meeting at the Brookings City Hall at 7:00 pm. Thank you for allowing me to share.

Sincerely,
Dr. Elli Kimbauer
cell phone 707.218.6725
1403 Inyo St, #111
Crescent City, CA 95531

TO: City of Brookings Planning Commission

Date: June 23, 2023

Re: In the matter of File No. APP-1-23, an appeal to the Planning Commission of a Notice of Abatement issued April 14, 2023 to St. Timothy's Episcopal Church (Note: Public Comment Form attached)

=====

My name is Kathleen Dickson, and I'm the music director at Smith River United Methodist Church, located about 15 miles from Brookings in California.

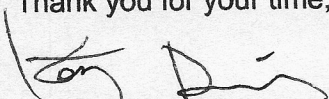
While my congregation is very small, we follow the same Christian tenets that St. Tim's does, and our social service ministry reflects that, I believe. As part of that ministry:

1. We offer a clothes closet for anyone who needs a warm coat, or a decent set of clothes for a job interview, or thick socks to help keep one's feet healthy.
2. We have a weekly food pantry - open for folks both within the community or just passing through - and do our best to keep it stocked with easy to use, shelf-stable foods.
3. We are the Smith River location for both the Del Norte County Food Bank and the Family Resource Council's produce distribution program (Pacific North Fresh Mobile Market), both of whom set up at our church for monthly distributions to the community.
4. We host a full after-church meal on Sundays that's free and open to the public.
5. We have been hosting the Monday community meal at St. Tim's since June, 2021. We host this meal at St. Tim's - rather than in Smith River - in order to reach as many hungry souls within our Wild Rivers Coast region as we can.
6. We are in the process of making space available in our church to True North, a local non-profit, so that they can increase their outreach within northern Del Norte county (this newest social service program should be up and running sometime in July.)

The Bible says: "What good is it, my brothers, if someone says he has faith but does not have works? Can that faith save him? If a brother or sister is poorly clothed and lacking in daily food, and one of you says to them, "Go in peace, be warmed and filled," without giving them the things needed for the body, what good is that? So also faith by itself, if it does not have works, is dead." James 2: 14-17.

Our mission as Methodists is built on the premise that "faith, without works, is dead", and the above ministries reflect this mission. Our denomination's "brand", if you will, is "Open Hearts, Open Minds, Open Doors", which truly reflects our grace-based theology and propels us to serve our neighbor, whoever that may be.

Thank you for your time,



Kathleen Dickson

Curry County resident and member of the Smith River United Methodist Church
18821 Montbretia Lane, Brookings, OR 97415 * 541-661-1385



Crescent City United Methodist Church
664 H Street
Crescent City, CA 95531

June 23, 2023

To Whom it May Concern:

Grace and Peace to you all, I pray this email finds you all well.

My name is Rev. Dana Gill, and I am the Pastor of both Crescent City United Methodist Church (CCUMC) as well as Smith River United Methodist Church (SRUMC), though I write to you today representing our CCUMC community of faith.

CCUMC is a small but vital congregation that has committed to serving the Del Norte community in a way that mimics Jesus. A few years ago, we recommitted to our missional services as a church, and updated our local church's Mission Statement to read, "Like Jesus, we love, accept, and care for those in our community in innovative ways." And care for our community we have!

- Since then, we have continued our Safe Space ministry which serves anyone who attends on Friday nights. We offer social time to just be, to plug in and recharge phones or (re)connect, fill their bellies, warm up, find a change of clothes, or use the bathrooms. This specific ministry is geared towards bringing together queer and straight, neurodivergent and neurotypical, able bodied and disabled, and we all do it while being together in community who love and respect one another as whole children of God. Under this Safe Space ministry umbrella, we also offer peer-to-peer support groups for Women and female-presenting folks.
- We offer up our facilities for to-go meals, bathrooms, or just a warm place to rest and regroup while we are open during the day, every weekday from 10am to noon.
- We pack and offer brown bag lunches for those using Del Norte Mission Possible's Shower Program on Tuesday mornings, and were the pioneers of this initial program.
- We offer sliding scale (all the way to free) dance lessons to the community, and soon we will be offering them to the youth as part of a free school-to-career pathway program for the "Promise Neighborhoods" community development, because we believe that healthy bodies and healthy minds are just as important as physical and social needs of folks.
- We offer our facilities to NA and AA groups to work towards their recovery as they seek wholeness and wellness as beloved children of God.
- We offer a free back to school fair to the larger community, focusing on services and supplies for homeless and foster youth, though they are available to anyone who comes to us and asks.

As United Methodists, our General Church Rules that we must always adhere to (and included in the vows I made upon my ordination) state simply: 1) Do No Harm 2) Do Good 3) Stay in love with God. We can do our best to do those things individually, but to do all of those three things together, in tandem, is a much more difficult feat yet it is what our faith requires of us. If we were unable to provide these services to all of God's children, our faith would be lackluster and nominal at best, because our faith, without works, is dead (James 2:26).

Yours in Christ,
Rev. Dana Gill



the
EPISCOPAL CHURCH
in WESTERN OREGON

Bishop's Statement on Ministries to the Needy
June 24, 2023
The Rt. Rev. Diana D. Akiyama

The Episcopal Church grounds its faith in the Holy Trinity, everlasting, of infinite power, wisdom and goodness; the Maker and Preserver of all things both visible and invisible. The mission of the church is to restore all people to unity with God and each other in Christ. This mission is pursued as the church prays and worships, proclaims the Gospel and promotes justice, peace, and love. The ministers who carry out this mission are its members: lay persons, bishops, priests and deacons.

The Episcopal Church is a sacramental church and of its sacraments the two great sacraments given by Christ to his Church are Holy Baptism and the Holy Eucharist. It is in our Baptism that we become members of Christ's body and seek to serve as commanded in the Gospels. Our Baptismal Covenant binds us to seek and serve Christ in all persons, loving our neighbors as ourselves, and to strive for justice and peace among all people, respecting the dignity of every human being.

The scriptures from both the Old Testament and New Testament instruct us to become God's people through acts of care and concern for those in need.

Matthew 25: I was hungry and you gave me food, I was thirsty, and you gave me drink. Truly, as you did it to the least of these you did it to me.

Luke 3: Whoever has two shirts should share with the person who doesn't have any. Whoever has food should share it too.

Isaiah 58: If you give some of your own food to feed those who are hungry and to satisfy the needs of those who are humble, then our light will rise in the dark, and your darkness will become as bright as the noonday sun....Share your food with the hungry, and give shelter to the homeless.

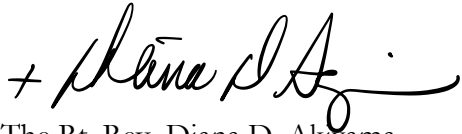
Other scriptural references which command service to the poor: Jeremiah 29:7, Ezekiel 18, Proverbs 22, Proverbs 25, Proverbs 2, Psalm 146.

Portland: 11800 S. Military Lane, Portland, OR 97219

Coos Bay: 420 Highland Ave, Coos Bay, OR 97420

www.ecwo.org | 503.636.5613

Therefore, the faithfulness of the church finds its expression not only in studying scripture, in prayer, worship and confession but through making Christ known in the world by serving Him in those who are hungry, vulnerable and in any kind of need. The ministries that flow from the faithful are for the purpose of healing our broken world through acts of compassion and mercy. The ministries that flow from the church are intended to fulfill our Christian call to proclaim the Gospel that, in Christ, there are no divisions based on race, privilege, wealth or power but only unity whose evidence is God's unsurpassed love.

A handwritten signature in black ink, reading "Diana D. Akiyama". The signature is written in a cursive, flowing style with a cross at the beginning.

The Rt. Rev. Diana D. Akiyama
Bishop
Episcopal Church in Western Oregon

Good evening, my name is Patricia Black and I am a lay worship leader and preacher and a member of the Mission Committee at St. Paul's Episcopal Church in Crescent City, just a few miles down the road from here.

As a life long member of the Episcopal Church I was surprised that the Brookings planning commission staff believes that church buildings are only for worship services. Yes, we hold regular services where we worship God and learn more about our faith and the work God is calling us to do and that work is invariably to "love our neighbor as ourselves." As followers of Jesus, we believe that whatever we do for the least of these our brethren we do for Jesus. How could we gather for worship and then then deny "a cup of water" to our neighbors?

With that in mind I would like to tell you about the different ministries that St. Paul's has offered at our church building (which by the way is located, as most churches are, in a residential area) over the 30+ years that I have been a member.

We have always kept food available for anyone who asks. For about 20 years we provided a monthly community dinner. Our guests included elderly singles, large families, and unhoused people hungry for community and a home cooked meal. St. Paul's felt blessed and proud to be able to offer this meal. When our older volunteers were no longer able to do all the work involved, we prayed for something we could do.

Our prayers were answered when we had the opportunity to host weekly showers for the unhoused community. This was a joint ministry with the United Methodist Church. They provided the labor and we provided the shower. We also offered a light brunch. We are grateful that the Senior Center was inspired to provide mobile showers and we now provide lunches twice a month for the people who come to the mobile showers. We also leave a lunch outside for whoever might be in need.

We had a little free pantry modeled on the concept of little free libraries. People dropped off food and other people took what they needed.

We always keep a supply of toiletries, socks, sometimes gas cards and other basic supplies for anyone who asks and we have a small discretionary fund for more complex needs.

We have outdoor electrical outlets that are available for people who need to come by and charge their phones and we have benches where they can rest while there.

It was a tradition in the Episcopal Church, which is part of the greater Anglican communion, that churches should always be open, a sanctuary for people to come in, rest, and pray. I have fond memories of the one day I spent in London getting off the double decker red bus and stepping into a church to rest and pray or just reflect on what to do next. Although we cannot keep our church doors open 24/7, we are proud that our buildings get used every day of the week in ways that reflects our values and what we believe God calls us to do. We have a room specifically dedicated to 12 step meetings. There are NA and AA meetings there every day and Al-Anon and OA meetings once or twice a week.

All of this is an integral part of our faith practice. It is the work of the church and has been for over 2000 years.

Lauri Ziemer

From: Elizabeth Klein [eklein13@yahoo.com] on behalf of Elizabeth Klein
Sent: Tuesday, June 20, 2023 4:03 PM
To: lziemer@brookings.or.us
Subject: Support of St. Timothy's Episcopal Church Agenda Item 4.2

Every church that I have been involved with for the past 30 years in Oregon has been involved in providing food and clothes for the hungry and poor. We have made food packs, hygiene kits and care packages and talked about sharing these with the houseless. This is the call and duty of all Christians. The people at St. Timothy's Episcopal Church are doing the work we are called to do as Christians. I pray for you and that you would understand the critically important work that they are doing to help the poor and hungry in Brookings, Oregon. I pray that your hearts will be changed and that you will thank the people at St. Timothys for doing the incredible work that they are doing to help the most vulnerable in our society.

Sincerely, Rev. Dr. Elizabeth Klein Deacon at Grace Memorial in NE Portland OR

eklein13@yahoo.com

4704 SW Snyder Place Portland OR 97221

(971)285-0424

Please give a copy of this email to each of the planning commissioners. Thank you.

From: Abby Ryan [mailto:abby1983ryan@gmail.com]
Sent: Thursday, June 22, 2023 6:45 PM
To: lziemer@brookings.or.us
Subject:

Hello, my name is Sylas Ryan. I am a lay leader at the United Methodist Church in Crecent City California. Our duty, as followers of Christ, is to the people. We provide services which may be considered "social services" as we are called to do. In addition to the list provided, we also provide a SafeSpace for all LGBTQIA+, are partnered with PACP (personal attentive care personnel) and we are hosting Sierra Service Project.

- weekday pastoral counseling
- weekday alms-giving/discretionary account distributions based on emergent need if someone walks into your church
- coffee or other refreshments other than Sunday morning coffee hour (or, alternatively, you have a very robust full meal "coffee hour" that is open to the public)
- snack pack
- hygiene kits
- socks or clothes closet
- toilets (or porta-potty) open to the public during some hours, perhaps when the office is open
- phone charging
- Internet use for the public (wifi)
- advocacy program
- help obtaining ID, birth certificate, driving license, food stamps, or enrolling in health insurance
- 12-step programs open to public

Thank you
Sylas

Good evening, my name is Michael Tompkins and I wish to speak to the Notice of Abatement issued to St. Timothy's Church. I am a citizen of Crescent City and member of St. Paul's Episcopal Church there, and have been a member in good standing of the Episcopal Church for over 50 years, but I come before you tonight as a member of the Board of Episcopal Community Services of the Diocese of Northern California. It is a grant-making Board that gave out 47,000 in grants last year, for community gardens, physical and mental healthcare, food programs, veterans stand down programs, for the poor and the homeless, exactly what St. Timothy's is doing. This brings me to my purpose for speaking to you tonight. There seems to be some confusion regarding the definition of what a church is, and what the church building is supposed to be used for. My purpose here is to help clarify that and I will offer in support of my clarification a short list of grants we at ECS have awarded. Our records go back to 2002, but my point can be made clear by starting in 2017.

Starting in that year, and moving up to last year we awarded the following grants, all of which were used for purposes either exactly like the ministries St. Timothy's is doing or very similar:

St. James' Lincoln	Community garden
Our Savior Placerville	Create permanent Stand Down Resource Center for Vets
Emmanuel Grass Valley	remodel building to serve at-risk Youth
Emmanuel Grass Valley	remodel building to serve at-risk Youth
St. Martins' Davis	Families Together Project
St. Johns' Chico	Funding for Farm Coordinator
Our Savior Placerville	Permanent Stand Down
St. Clements' Rancho Cordova	Moral Injury Project
St. Nicholas' Paradise	kitchen remodel to serve meals
Our Savior Placerville	Permanent Vet Standdown (2 nd year)
St. Francis' Willits	Kitchen remodel second year
Incarnation Santa Rosa	Open Table Ministry

St. Andrews', Antelope	Refuge garden
St. Georges, Carmichael	Community garden
Center at St. Matthews	Oasis Project
St. Paul's, Sacramento	Hope's Space
St. Pauls, Sacramento	Hope's Space (2 nd year)

This list, as I said before, is not exhaustive, but I think you get the picture. Our guiding principle is "Serving Christ by serving others", exactly what St. Timothy's is doing.

These grants support inner city churches like St. Paul's Sacramento, where Hope's Space operates an outreach program that includes every kind of ministry St. Timothy's is doing now, from feeding to healthcare, including mental health. We also support churches in smaller cities like Epiphany church Vacaville, where a parish nurse provides healthcare, food, clothing, and anything else she can in a residential area just like St. Timothy's. Then there is the Brookings sized town of Sutter Creek, where parish nurse Susan at Trinity Church for many years provided behavioral health care which included suicide counseling, as well as clothing and food to all who came to her, again in a residential setting.

We have records of many more grants going back to 2002, and all involve outreach into the community that especially seeks out the unhoused and poor. Our guiding principle is found in the Gospel of Mathew in Christ's parable of the sheep and goats, which I will not bore you with, but the point of that parable is that following Jesus, serving God, very explicitly means feeding the hungry, clothing the naked, caring for the poor in any way needed.

I would add one important point to this discussion: As Christians we are called to work together as a body, not as individuals disconnected from one another. This is a doctrine of the Episcopal church, not my personal opinion, and the implications of this is that what the good people of St. Timothy's are doing is best done at the church, for that work is the true worship of God, much more important than a Sunday morning worship service, which is actually the culmination of a whole week of serving God, not the single purpose of the building.

Thank you for hearing me.

RE: File No. APP-1-23

Brookings Planning Commissioners,

I submit these comments both as a professional urban planner as well as an Episcopalian. I believe my perspective as both a planner and a Christian could potentially be useful in assisting your decision making on this file.

While I wholeheartedly support the important role of development regulations in managing how land is used, it is important in this case to take a step back and see this issue from a broader perspective.

The field of urban planning as we practice it in the US today was borne out of the public health movement during the Industrial Revolution. Early planners recognized that land use regulations were needed in order to protect the wellbeing of those living in extreme poverty. Some of the first of these regulations included zoning residential uses away from industrial uses, requiring windows in tenements, and making space for dedicated parkland.

Urban planning began because of the need to protect and support vulnerable people.

Additionally, the professional code of ethics as adopted by the American Planning Association is clear: As planners, we should use our positions to advance social equity, including advocating for policies and programs that support upward economic mobility.

As a Christian, I believe it is the highest calling of the church to serve those in need. To argue that the purpose of a church should be so narrowly prescribed as to only include worship services is fundamentally antithetical to the values and practices of Episcopalians. We are not a Sunday-morning-in-the-pew only faith. Directly addressing domestic poverty is a key ministry of the Episcopal church, and to deny our ability to do that is to deny our right to religious freedom.

I will repeat that because it deserves emphasis: to deny us our ability to practice our faith by acting on what we believe is to deny us religious liberty.

Episcopalians, as part of our Anglican tradition, use the Book of Common Prayer as a tool to guide our worship practices. Among the Prayers and Thanksgivings section of the BCP are two prayers I would like to include in my comments here.

35. For the Poor and Neglected

Almighty and most merciful God, we remember before you all poor and neglected persons whom it would be easy for us to forget: the homeless and the destitute, the old and the sick,

and all who have none to care for them. Help us to heal those who are broken in body or spirit, and to turn their sorrow into joy. Grant this, Father, for the love of your Son, who for our sake became poor, Jesus Christ our Lord. Amen.

23. For Local Government

Almighty God our heavenly Father, send down upon those who hold office in Brookings the spirit of wisdom, charity, and justice; that with steadfast purpose they may faithfully serve in their offices to promote the well-being of all people; through Jesus Christ our Lord. Amen.

Sincerely,

Shelley Denison, MPA, MCRP, AICP
2700 W Powell Blvd, Apt 325
Gresham, OR 97030

Public Comment Form

I would like to comment on : June 27th, 2023 Planning Commission Meeting

Agenda Item #: 4.2 IN SUPPORT OF

Item Title: In the matter of File No. APP-1-23, an appeal to the Planning Commission of a Notice of Abatement issued April 14, 2023 to St. Timothy's Episcopal Church

Name: Rebeca Malmgren, Evangelical Lutheran Church in America, Coordinator of Economic Diversity

Address:

Work: 8765 W. Higgins Rd., Chicago, IL 60631

Home: 8214 Sierra Woods Ct. Carpentersville, IL 60110

Organization: Evangelical Lutheran Church in America

Phone: 765-413-4521

Dear Planning Commission,

I work for the Evangelical Lutheran Church in America as the Coordinator of Economic Diversity. My position exists in part for supporting, promoting growth and resourcing of places like St. Timothy's.

For your awareness, the ELCA and Episcopal Church have been in full communion for over 20 years, on the basis of a shared ministry in the historic episcopate and for the sake of common mission in proclaiming and serving the gospel.

There are hundreds of worshiping communities that serve in marginalized communities AND offer justice and equity programs. They are in all 50 states and are a crucial part of the ELCA, it is a core part of Lutheran identity/faith and practice. We believe that the ELCA is called to foster and facilitate the ELCA's engagement in service with and among communities, globally and locally, and to promote efforts to call and act for justice. Part of this work is done by engaging systems and processes in the public square and seeking a more robust, just and equitable response to the many hardships affecting the communities where we live and serve. Most of our work happens as we support the free course of the gospel of Jesus Christ in the world and the freedom of Christians to love and serve their neighbor... This is the way of Jesus, a deep, passionate and extravagant love that leads to restored relationships and transformed communities. We seek to activate people so that this world may experience community, justice and love.

Furthermore, it is an honor of mine to care for and coordinate a highly valued group, the ELCA Homeless and Justice Network, Rev. Sr. Cora Rose and St. Timothy's are part of this network. The HJN is an Ecumenical (many different denominations are included, Episcopal, United Church of Christ, Presbyterian etc...) network of churches that all have worshiping communities AND justice initiatives that they coordinate and advocate for. This includes food ministries, community meals, community gardens, shelters, prison recovery/re-entry, affordable housing...the list goes on and on. The Homeless and Justice Network spans across the whole county, West Coast to East Coast. While each individual location is special, St. Timothy's is not alone in this work. In fact, of the ELCA churches that are working with and among marginalized communities, about 62% have some type of food ministry and community meal.

The ELCA equips local congregations in ministries of justice and service, because these ministries and values are core to our faith and practice, who we understand God to be, and what God's call is on our life together. The church isn't just a building, the Church is without walls with practices completely interwoven into our life of worship AND discipleship; they are not separable.

The abatement issue against St. Timothy's should be dismissed so that it can continue to do this important work in their community.

Rebeca Malmgren

Rebeca Malmgren

Coordinator for Economic Diversity

ELCA Homeless and Justice Network

Congregational Vitality

Evangelical Lutheran Church in America

8765 W. Higgins Road, Chicago, IL 0631-4101

rebeca.malmgren@elca.org

Dear Brookings Planning Commission,

My name is Emily Ronsberg, and I serve as the Intern Pastor at Gloria Dei Lutheran Church in Coos Bay, OR. I write here in support of the matter of File No. APP-1-23, an appeal to the Planning Commission of a Notice of Abatement issued April 14, 2023 to St. Timothy's Episcopal Church.

With the exception of one parcel next door to Gloria Dei's church building that was recently rezoned from small lot residential to mixed use in order to build affordable housing (land that is being sold by the church to Northwest Housing Alternatives for that express purpose), **both Gloria Dei's physical church building and the neighborhood surrounding the church is zoned small lot residential.**

In the course of our everyday, normal ministry, we routinely engage in work that could be called social services. We see this work as grounded in our Christian belief that God calls us to care for our community in physical, embodied ways. We encounter God's presence with the community members that we assist, and that makes this work worshipful for us. For what is worship if not an encounter with the God of the universe? Therefore, these kinds of social services cannot be separated from how we live out our faith in the world. **We are greatly concerned that any governmental body would limit the expression of our faith by preventing us from loving our neighbors through acts of charitable hospitality.**

It is not uncommon for various community members to seek assistance with us throughout the week for support in getting their basic needs met. Our current faithfully offered social services include but are not limited to:

- bags of food given to the hungry
- a place to charge electronics
- bathrooms available when the office is open, 9am-4pm Monday-Friday
- pastoral care staff present daily
- a pastor's discretionary fund used to financially assist community members in need
- monthly free meals for the community, and
- referrals to other community organizations or congregations that offer different social services than Gloria Dei does

Additionally, Gloria Dei is involved with a local congregational group in Coos Bay and North Bend consisting of two Lutheran congregations, one Methodist congregation, one Presbyterian congregation, and one Episcopal congregation who have banded together to pool our financial and physical resources to offer more robust support to community members in need. **This practice of churches caring for people in embodied ways is not one Gloria Dei Lutheran Church or St. Timothy's Episcopal Church are alone in doing.**

For the sake of your community members and neighbors in need, and St. Timothy's care for them as part and parcel of what it means to be a church engaged with the world, I urge you to move in support of St. Timothy's appeal of the Notice of Abatement.

In Christ,



Intern Pastor Emily Ronsberg

Gloria Dei Lutheran Church
1290 Thompson Rd
Coos Bay, OR 97420

June 25, 2023

My name is Pastor Jon Myers, and I serve the closest ELCA Lutheran church in Oregon to Brookings. The ELCA is the largest Lutheran denomination in the United States, and many ELCA congregations partner with Episcopalians in a variety of ministries. The congregation I lead, Calvary, has several programs of its own that would best be described as “social ministries,” or which serve significant numbers of people outside our membership.

For example, Calvary has a discretionary account used to help people in need who come to our door looking for assistance. We also recently budgeted for a project to create “Blessing Bags” to meet other needs in the community. We serve a monthly meal that is open to anyone in our community, and an integral part of my work is on-site pastoral counseling with anyone who requests it, not just Calvary members.

All ELCA Lutheran congregations are charged by their governing documents “to meet human needs, caring for the sick and the aged, advocating dignity, justice, and equity for all people.” This is as integral to expressing our faith as anything that happens during Sunday worship. Similarly all pastors in my tradition are charged “to speak publicly to the world in solidarity with the poor and oppressed, advocating dignity, justice, and equity for all people.”

And each ELCA Lutheran pastor takes a vow at our ordination to “give faithful witness in the world through word and deed, that God’s love may be known in all that [we] do”—not just in how we lead worship on Sunday mornings. I took this vow, among several others, and I will always advocate for my colleagues, including Episcopal priests and Lutheran deacons, that they may be able to fulfill theirs.

Pastor Jon Myers
Calvary Lutheran Church
909 NE A Street
Grants Pass, OR 97415

June 26, 2023

Lauri Ziemer
Planning Tech
lziemer@brookings.or.us

Dear Laurie,

Blessings as you breathe in the gift of these summer days.

For 139 years women in our Community, The Deaconess Community of the ELCA, have faithfully responded to Christ's call to love our neighbor – *I give you a new commandment, that you love one another. Just as I have loved you, you also should love one another.* John 13:34 As deacons in the Evangelical Lutheran Church in America (ELCA) and the Evangelical Lutheran Church in Canada (ELCIC) we have responded to this call for centuries – serving at the intersection of church and society.

This ministry, for which we are formally educated, formed, and ordained by our denomination to carry out, is compelled by the love of Christ and motivated by Christ's teaching, as we read in Matthew 25 -

³⁷ Then the righteous will answer him, 'Lord, when was it that we saw you hungry and gave you food or thirsty and gave you something to drink?' ³⁸ And when was it that we saw you a stranger and welcomed you or naked and gave you clothing? ³⁹ And when was it that we saw you sick or in prison and visited you?' ⁴⁰ And the king will answer them, 'Truly I tell you, just as you did it to one of the least of these brothers and sisters of mine, you did it to me.'

We give thanks for the ministry of Sister Cora Rose, a member of our Community, as she serves with St. Timothy's Episcopal Church in Brookings in responding to Christ's call to love our neighbors. This ministry of service to the vulnerable and marginalized is found in the work of congregations across the United States and in Canada.

Like Sister Cora, our Sisters and ministry partners work with their members in listening and responding to their neighbors needs through regular worship, education, and providing social service resources in food and clothing pantries, child-care, health clinics, shelters and programing for the unhoused –providing showers, computer stations, advocacy, washing machines, etc. The ministries to poor and low-wealth neighbors are found in congregations across the continent. While **100% of our Community** has always served, and continues to serve in ministries to and with the vulnerable and marginalized, we celebrate the ministries of all congregations (a few named below) that work faithfully, like St. Timothy's to live Matthew 25 – the call of the church:

Bethlehem Lutheran Church – New Orleans, LA – Community Table: Meals/Housing/Education
Trinity Lutheran Church – New York, NY – Trinity Connection: Meals/Housing/Advocacy
Immanuel Lutheran Church – Jackson, MI – Refugee Social Services

Deaconess Community of the ELCA
8765 W. Higgins Road, Chicago, IL 60631
- Working for justice and the flourishing of all God's creation -

The Well – Philadelphia, PA - Women's Shelter/Meals/Education/Advocacy
Cathedral in the Night – Amherst, MA: Meals/Housing/Advocacy
Gathering Table – Kansas City, MO: Meals/Housing/Education/Advocacy
St. John Lutheran Church – Marion, TX: Meals provided to schools through the church
St. Paul Lutheran Church – Carlisle, PA: Refugee Social Services/Housing

As Jesus fed the 5000 and called us to feed the hungry, clothe the naked, welcome the stranger, and wash the feet of our neighbor, deacons in the church have responded to this call with a loud Amen and Yes, with the help of God! The congregations in which we serve partner in this ministry to create bridges as the gospel is celebrated and all of God's creation has the chance to flourish. This is not a new ministry. For centuries we have been calling on God's mercy, grace, hope and love as we faithfully serve with our neighbors.

This is church – compelled by the love of Christ! Motivated by the love of Christ, our Community prays with you as you listen with your neighbors and respond.

Compelled by the love of Christ,
Sister Noreen

Sister Noreen Stevens
Directing Deaconess
651.815.1145

LINDA STRINE

93933 Bridge View Lane
North Bend OR 97459

June 26, 2023

Dear Planning Commission,

My name is Linda Strine, and I'm currently in my second year as Congregation Council President of Gloria Dei Lutheran Church in Coos Bay, Oregon. Our congregation has always considered our mission to be to welcome all members of our community, and to humanely provide social services and/or financial support to our communities locally and around the world.

I can personally attest that Gloria Dei Lutheran Church has participated in the following services over the past ten years:

- Weekday Pastoral Counseling
- Weekday discretionary account distributions if someone with emergent needs comes into our church
- Before the Covid 19 epidemic we provided free meals twice a month to any members of our community who could attend, focusing on the elderly and hungry. In April of 2023 we started providing such a meal once a month with hopes of continuing that program in September with the hope of being able to provide two or more free meals a month in the future.
- We still participate with other local churches to provide free Community Meals every Saturday at a local church.
- We have provided snack packs for distribution to the hungry for several years and continue doing so.
- We have a program called Ruth's Closet in which we provide basic "move-in" necessities for the unhoused who are moving into an apartment or home. Kitchen basics, garbage bags and bins, furniture (as available), laundry supplies, cleaning supplies, and linens are our primary focus.
- At one point we had an arrangement with a local dentist for dental services for the needy
- We housed an AA program which was open to the public for over ten years.

Through our faith we are called to serve those less fortunate than ourselves, and the idea of a public body seeking to interfere with much-needed social services to our economically depressed area is concerning for our society in general. It's part of our baptismal covenant to proclaim the good news of God in Christ through word and deed and serve all people following the example of Jesus Christ.

Sincerely,

Linda Strine

Linda Strine, President
Congregation Council
Gloria Dei Evangelical Lutheran Church of Coos Bay – North Bend

From: Tabi Rogers [mailto:tabreena17@gmail.com]
Sent: Monday, June 26, 2023 11:04 AM
To: lziemer@brookings.or.us
Subject: Testimony on behalf of St. Timothy's

Dear Lauri,

My name is Tabreena (Tabi) Rogers and I am a Pastor at Cornerstone Assembly of God Church in Crescent City, CA. We have been serving this community of Faith since 2005. Over the years we have served the needs of our community in the following ways:

1. Pastoral Counseling
2. Weddings (on and off campus)
3. Funerals (on and off campus)
4. Food distribution programs (on and off campus)
5. Free Meals at the church
6. Holiday meals and gifts for families in need
7. Clothing giveaways
8. Coffee and Bible Studies throughout the week
9. Discretionary Food and gas cards given as needed
10. God Dash-emergency food and help in the moment.
11. Practical help and pastoral care.
12. Life Skills classes

All of the above service stems from our Care Ministries Department and is overseen by my husband and myself and the church board. There are many churches within our community that provide all of these services and more within the Del Norte County area. We are proud to partner together for the greater good!

Sincerely,

Tabreena Rogers
1130 Oregon Street
Crescent City, OR 95531

APP-1-23
Supplemental Planning Commission Packet II

[illegible]

From: Karen Pringle Cunningham [mailto:kappy.kp@gmail.com]

Sent: Tuesday, June 27, 2023 5:50 PM

To: LZiemer@brookings.or.us

Subject: Public Comment Item #4.2

Here are my comments for tonight's meeting.

Karen Pringle Cunningham

To the Brookings Planning Commission June 27, 2023:

My name is Karen Pringle Cunningham and I live in Brookings Oregon. I worked my way up from Assistant Planner to Planner II in Missoula City and County Planning Department in the 1980s to mid 1990s. My education was a BA in Geography and Land Use Planning and I continued in this field of study with the American Planning Association. Later I submitted Community Economic Development Plans for five different counties in Montana, necessary for communities to establish Small Business Development centers and qualify for state and Federal grants.

I am retired and a grandmother now but one with relevant experience to talk to you about the foundational principles of the Planning Commission laid out in the Oregon Planning Commissioner Handbook of 2015. I want to call your attention to the principles that I don't see addressed as they should be in the staff report.

From the Oregon Planning Commissioner Handbook 2015

"Purpose of the Goals: Development and Preservation

Taken as a whole, the goals are best understood as devoted to creating and maintaining sustainable, livable, and equitable communities.

The overall principle of the Planning Commission is to provide for the public's health, safety, and welfare. Each community defines this separately and it changes as time progresses, but it is this mandate from the federal and state constitutions that creates the basis for planning and related activities."

Look at this next principle in your foundational documents:

"Assure that a long-term perspective is taken in the decisions: It is not easy to remember that decisions must be made with those not at the hearing and those yet unborn in mind, as well as the applicant. It is the combination of good process with good values that will lay the foundation for good planning in your community."

All of this is to say the role of the planning commission is to take into account the larger public good. The benevolent activity which is the mission of the church is not only a basic public good but foundational to the church, that is providing fish (meals, showers, laundry) as well as teaching people how to fish (through advocacy.)

St Timothy's is providing a public good through gifts, grants and volunteers that the local government is unable or not inclined to provide. They are a resource for public well-being. Why would anyone want to penalize them for gathering people and resources to deal with problems of poverty whether that poverty is situational (loss of a job or ill health) which can happen to anyone of us, or intergenerational poverty, which requires a different set of ministerial activities.

You know the metaphor of “why do we have to catch people drowning in the river downstream when we can keep them from falling into distress up river.” This is the role of St. Timothy’s ministries, to do both.

The recommendation to curtail or reduce the mission of the church is like saying we can only help the needy if you fall into the river on Monday and Tuesday, and we can’t give you the kind of help you need because local planning commission recommended limitations. And what are those limitations based upon?

It is in Brookings public interest that the church helps people reunite with their families; to help a person or family find the medical care they need, a job, a home.

Consider the planning principles outlined in the Planning Commission Handbook:

Prepare for the future... *St Timothy’s is helping the community prepare for the future. Imagine where we would be if they had not stepped forward to provide testing and vaccination services as well as the stay at home wrap around services at the height of the epidemic.*

Anticipate change... *St Timothy’s anticipated the needs and gathered together the qualified professionals and volunteers.*

Maximize community strengths... *St Timothy’s is leveraging benefits for those in need and for the community. Helping people help themselves.*

Minimize community weaknesses. *St. Timothy’s is helping to overcome local deficiencies in service for those in need.*

Protect scarce resources... *St. Timothy’s is a scarce resource that is benefiting the public’s interest in a livable community.*

Consider the future of Brookings without these basic ministries from St. Timothy’s.

In establishing the evidence for you to make a decision in this case, the staff report is silent on the public interest and limited to technical remarks which are at times inconclusive and the tone adversarial.

The staff report lacks the long term perspective and does not address the very planning principles and goals found in your foundational documents, the principles from which you operate.

I recommend you support St Timothy’s appeal and withdraw the Notice of Abatement issued to St. Timothy’s and recognize them as an essential ministerial organization that makes our community sustainable, livable and equitable.

Info from Public Comment Form:

*Karen Cunningham
520 Redwood Street
Brookings, OR 97415*



July 4, 2023

VIA EMAIL

Planning Commission
Attn: Lauri Ziemer
City of Brookings
898 Elk Drive,
Brookings, OR 97415

Re: Second Evidentiary Submission in Support of St. Timothy's Church Appeal of the April 14, 2023, Notice to Abate.

Dear Planning Commission Members:

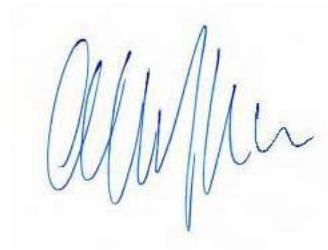
This office represents St. Timothy's Episcopal Church ("St. Tim's") in the above referenced matter. St Tim's operates a church use ("Church") at the subject property at 401 Fir Street ("Property"). St. Tim's received a Notice to Abate issued by the City of Brookings (the "City") on April 14, 2023. Prior to the City of Brookings Planning Commission Meeting on June 27th, we submitted a packet of evidence on St. Tim's for the Planning Commissions review.

During the public hearing, we requested that the record be kept open for an additional 7 days and for the opportunity to submit final legal argument. Accordingly, the record will be kept open for all parties to submit additional evidence until July 4, 2023, with the deadline for rebuttal evidence (all parties) on July 11, 2023, and the deadline for final legal argument by the St. Tim's on July 18, 2023.

Please find the following documents attached for submittal to the record.

- On the issue of the Church's non-conforming use
 - o Letter from Father Bernie dated July 3, 2023
- On the issue of "typical" church uses
 - o Written testimony from Deacon Linda Lee (presented orally at the public commission hearing)

Very truly yours,

A handwritten signature in blue ink, appearing to read "Allison J. Reynolds". The signature is fluid and cursive, with the first name "Allison" and last name "Reynolds" clearly distinguishable.

Allison J. Reynolds

July 3, 2023

Via Email

Planning Commission
Attn: Lauri Ziemer
City of Brookings
898 Elk Drive
Brookings, OR 97415

**Re: Evidence in Support of St. Timothy's Episcopal Church Appeal of April 14, 2023,
Notice to Abate.**

Dear Planning Commission Members:

I am the Reverend Bernie Lindley, the vicar of St. Timothy's Episcopal Church here in Brookings. This letter supplements the letter I sent on July 27, 2023. In this letter, I would like to provide additional evidence of a continuous conditional use at the Church with regards to the "social services" mentioned in the Notice to Abate.

Pre-1989 Uses:

The City agrees that because St. Tim's use of the church pre-dates the Brookings Code (which was adopted in 1989), the St. Tim's has 'de facto' conditional use rights. This is my knowledge about church operations at the site prior to 1989.

In 1981, St. Tim's began a major addition to the church building. It was completed in 1982. This project doubled the size of the building, adding the current parish hall and kitchen downstairs, as well as the addition upstairs of two offices, the parish library, the sacristy, and two bathrooms, one of which had a shower installed during the building project. That shower was put in for the purpose of being used by non-church members and has been used by non-church members ever since.

In 1984, we started hosting the Food Bank in our old parish hall (the basement of the original church building, directly under the worship space). The Food Bank stayed in our building until about 2004 or 2005 when they relocated to a larger space. I do not know how many people were served each week, but they were, to my recollection, all low-income folks, and included both housed and un-housed individuals.

Also, between 1980-1987, our vicar, Fr. Tom, had a discretionary fund that he used for alms for the poor. The vicars at St. Tim's have never had a practice of telling anyone to whom we distribute our alms, so I am not sure what exactly that fund was used for between 1980-87. It is not something we specifically report or take a financial tally of because we want to respect the privacy of the individuals we provide alms to. However, I am certain that such services were provided because when I was sorting through old church files several years ago (well before the COVID-19 pandemic), I discovered records of checks written in this period. Because of the

amount of time that had passed and to protect the privacy of the individuals we provided alms to, I recycled those records at the time.

Pre-1999 Uses:

St. Tim's applied for a conditional use permit to expand the church building in 1999, which was granted by the City. As the City recognizes, that amended conditional use permit also authorized the church's use as it was occurring in 1999. This is my knowledge about church operations at the site between 1989 and 1999.

In 1999 we started a project to expand the worship space upstairs to accommodate growth in the Sunday attendance. I filled out the amendment to an existing conditional use application that is attached to the staff report.

During the 1990s, we were still doing the food bank and almsgiving. I cannot remember what other outreach ministries we had on the church grounds at that time. But homeless people would often join us in the church library for Wednesday Bible studies. They would be offered a cup of coffee as well as other hospitable things, even tents and sleeping bags. Father Bill handled most of that. In addition, the Church office hours we provide today were the same as in the 1990s – Monday, Wednesday and Friday from 9 to noon. The same activities occurred – people were able to use the shower, have fellowship with others, and receive advice on a range of topics. Many people would come in for alms during office hours just like they do today. I saw them and Father Bill would mention it to me occasionally (since he was in charge of providing alms at that time).

The Church is the only place the un-housed can go.

Some of the testimony at the meeting on June 27 raised concerns about safety and security in the areas surrounding the church. We do not permit un-housed folks to sleep at the church (we have in the past had special permits for certain situations but those are not active at the moment). However, the church is near Azalea Park and this is an area where un-housed people tend to find rest. We do not encourage people sleep or congregate in Azalea Park, but—like the rest of this town—we are aware that it occurs.

Un-housed folks utilize Azalea Park because it contains one of the only public bathrooms. The bathrooms at the other City parks are kept locked, as well as the bathroom near Mill Beach. We do not ask people who come to St. Tim's for office hours where they are sleeping or if they are utilizing Azalea Park, so we are not able to provide data about whether the people we serve during office hours are un-housed. However, we do know that at least 10-15% of the people who come to the church during office hours are housed because they are looking for help with rent and utilities related to their housing. Our purpose is to assist anyone who comes in our doors, regardless of their circumstances.

Even if people who are un-housed and stay in Azalea Park are visiting the church, the impact on the neighborhood from their visits to the church is minimal because those individuals would not have to walk through the residential area to access the Church. As the vicinity map shows, individuals in Azalea Park would only need to cross Old Country Road where it intersects Fir Street to access the church.

Thank you for your time.

Bernie Lindberg

For: Agenda Item #4.2 in support of Appeal -File #APP-1-23 Notice of Abatement
June 27, 2023, Testimony for Brookings Planning Commission Hearing
Reverend Linda Lee with St. Timothy's Episcopal Church
Po Box 7174 Brookings, Or. 97415 (503) 309-9083

Hello, my name is Deacon Linda Lee

The very core of Christian ministry at St. Timothy's Episcopal Church is building relationships and in particular, with those who are in need. One of those many significant relationships have to do with a woman who grew up here in Brookings and is still a resident. She had been coming to the church regarding her need for companionship and shelter as well as due to the chronic pain she had been suffering. This is when I met her late last summer. It was very clear that her status within the community was a hinderance to her getting proper and adequate ongoing medical care. Through my relationship with St. Timothy's Church, she has had a volunteer to be her medical advocate every single week since the fall of 2022 when the diagnosis of a life-threatening cancer was given. The threat to her life was great and was going to require multiple 4-day chemotherapy sessions in the hospital at OHSU with surgery to follow. Her medical team was large and complicated. Issues around her housing, transportation, and emotional support were ongoing. Her prognosis was very dire, and rehabilitation from extensive surgery problematic. Today she is tumor free and on the road to full recovery. And due to St. Timothy's presence in the community to represent her needs she is now in her own home for the first time in years. It is building relationship with those in crisis that makes all the difference. It is St. Timothy's Episcopal Church presence in this community that has made this kind of stability and healing possible. This is just one example of what the people connected to this church do because we are called by our baptism to follow Jesus and serve God's people.

And for me personally, this is part of my ordination vows as a deacon. Deacons are expected to be an example of service in the church and to uphold the acts of mercy and justice. We all know poverty, weakness, sickness, and loneliness are global conditions. The focus of the ministry of an ordained deacon in the Church worldwide is right out of scripture readings which have existed since the Apostle Luke wrote about this in The Book of Acts. Included are teachings about deacons ministering to those in need as well as the work of seeking out the causes of oppression.

Out of this service of mercy flows concerns for justice. The Church worldwide focuses on this need for Christian service and as an ordained minister of the Church this is why am associated with St. Timothy's Episcopal Church...they more than many are doing this necessary work within the community.

As to what is a Church: it is folly to think one can worship God only from the church sanctuary, participating in the prayers only, and praising the God in heaven while you turn away from God's children here on earth who are in deep need and may even be unsheltered. Pure folly. Scripture reminds us we are to look for God among the vulnerable, the weary, the traveler, the lonely and the stranger. Because this Abatement document purports to knowledge of what a Christian Church is created for then I must assume you understand the portion of the New Testament called Matthew 25 where Jesus teaches his disciples about the importance of loving and serving others as if they were serving Jesus himself

As followers of Jesus, we have a choice: We can respond to unsettling realities in fear and withdraw or we can follow Him in responding to the greatest needs of our day with compassion, mercy, love, and with hope. Jesus could not have been clearer – that a warm welcome to a stranger, one in need, is nothing less than an act of worship. This is the foundational part of the Christian faith...to be outwardly oriented towards those in the midst of a crisis.

The Church is where I live out my Baptismal promises as well as my Ordination vows. The Church is where I would connect with and join with others to help those in need. Christianity is also based on the sharing of alms. The deacons share in this activity of giving away a portion of the church's donated resources to those who do not have enough. In scriptures again and again we read that the care of the poor and oppressed was a central feature of Jesus's ministry alongside the proclamation of the Good News which was that God is Love. Ironically given the nature of today's meeting, Jesus's teaching was also challenged by the Temple authorities regarding the story of the Good Samaritan. Jesus commended the one who answered correctly regarding the appropriate action of the those in that story...The answer was," The one who showed mercy". Throughout the Bible, mercy is linked with worship. Out of this service of mercy flows concerns for justice. Thank you for your time and may God bless you.



June 27, 2023

Allison J. Reynolds
760 SW Ninth Avenue, Suite 3000
Portland, OR 97205
D. 503.294.9625
allison.reynolds@stoel.com

VIA EMAIL

Planning Commission
Attn: Lauri Ziemer
City of Brookings
898 Elk Drive,
Brookings, OR 97415

**Re: Legal Argument in Support of St. Timothy's Church Appeal of the April 14, 2023,
Notice to Abate.**

Dear Planning Commission Members:

This office represents St. Timothy's Episcopal Church ("St. Tim's") in the above referenced matter. St Tim's operates a church use ("Church") at the subject property at 401 Fir Street ("Property"). St. Tim's received a Notice to Abate issued by the City of Brookings (the "City") on April 14, 2023, directing the Church to file a conditional use permit application to abate the Benevolent Meal Service violation and stop providing "a variety of other social services" (the "Notice"). Prior to the request for an appeal, the City agreed to stay the benevolent meal service violation because of the ongoing federal litigation regarding the City's Benevolent Meal Service ordinance. **The staff report contains several factual mischaracterizations which we correct in this submission. This letter also provides further support that St. Tim's activities at the Property, (referred to as the "social services" in the Notice), are a typical church use and do not violate the Brookings's Municipal Code ("BMC").**

I. DISCUSSION

A. Clarification of the activities occurring at St. Tim's Church.

The facts cited by the Staff Report supporting the staff recommendation to deny the appeal and continue the City's enforcement actions against St. Tim's misstate or misconstrue the

current activities at the Property. It is important to correct the record of the Church's activities, since the City is threatening enforcement action based on what appear to be incorrect assumptions.

Attached as exhibits A & B to this letter are Letters from Father Bernard Lindley ("Fr Bernie") and Sister Cora Rose ("Sister Cora"). As explained in the letters from Fr Bernie and Sister Cora, the following activities that the City appears to classify as "social services" and which appear to be the subject of the Notice are ongoing at the Church:

- "Advocacy clinic" and "legal clinic": The "advocacy clinic" and "legal clinic" are a time when the Church opens its doors for visitors to receive spiritual advice from Fr. Bernie, Deacon Linda and Sister Cora. This guidance includes assisting people in navigating processes like obtaining birth certificates and identification cards, enrolling in health insurance, connecting to therapy and treatment, and applying for jobs and housing, and referrals to service providers. As stated by Sister Cora, the "legal clinic," is part of the "advocacy program, but is focused on either assisting with or providing for referrals for legal issues. These activities coincide with the "day program" and occur within the same time period: Monday, Wednesday and Friday from 9am to noon. St. Tim's also occasionally refers to this period of time when the Church is open (Monday, Wednesday, and Friday from 9 AM to noon) as office hours.
- "Day program": The "day program" consists of the Church opening its doors from 9am to noon on Monday, Wednesday, and Friday to allow people to enter the Church building use shower facilities, participate in fellowship with others, rest, and access the advocacy and legal clinic which are a part of what goes on in the Church during the day program.
- Attendance: Approximately 20-30 people total (including those seeking advocacy and legal assistance) visit the Church during the day program hours.
- Staffing: The Church has several paid staff (all part time) that are involved in the various activities at the Church in addition to the day program (and its components). The paid staff involved with the advocacy program are Fr Bernie, Sister Cora, and Machell Carroll. In addition, St. Tim's has two part-time parish secretaries and one unpaid deacon, who primarily are involved with church services on Sundays, but sometimes volunteer in the day program and advocacy clinic. As is common at any church, parishioners also volunteer their time to provide ministry. During the day program hours there are typically 5 paid staff or volunteers present at the Church providing ministry in one way or another.

Several statements in the Notice and Staff Report seem to contradict these facts and are inaccurate as follows:

- The Staff Report states that “the City has also become aware of information suggesting that the number of people served by the Church’s social services activities exceeds the number of church parishioners,”¹ but does not provide evidence to support this conclusion. Father Bernie’s letter clarifies that the Church welcomes around 45 people to its Sunday services, while seeing up to 30 people during its office hours (M, W, F from 9:00-12:00).
- The Staff Report inserts *select* portions of the deposition of Father Bernie in the federal litigation that overstate the activities occurring at the church. The Staff Report states that “the Church operates a “legal” clinic for 19-20 hours per week. As the letter from Sister Cora indicates, she only meets with “clients” during office hours which occur during the day program. People are not coming and going from the church to visit the legal clinic for 19-20 hours per week.
- The Staff Report misstates that the Church has 6-7 paid employees “for these activities,” referring to the “social services.” Father Bernie is a paid as a member of the clergy, not just for advocacy. Sister Cora and Machell Carroll are paid primarily for their work administering alms and providing guidance through the day and advocacy program. In addition, there are two other paid employees, the parish secretaries, whom are associated with the administering of alms during office hours and they, too have additional voluntary roles at the Church beyond assistance with the day program and office hours.
- The Notice indicates that an “outreach clinic” is occurring and the Staff Report states that weekly HIV testing occurs at the Church. The outreach clinic is no longer occurring at the Church. Testing for HIV and communicable diseases is offered by a third party on St. Timothy’s property during office hours, currently one day per week.

B. St. Tim’s Has Provided Sufficient Evidence that “social services,” including the particular social services at issue are a typical church use.

The Staff Report concedes that the BMC does not provide a definition of “church” use or otherwise explain what types of activities this use includes. Thus, what constitutes a “church” is a matter of interpretation. Staff advocates for using the dictionary definition of church as a “building for public and especially Christian worship.” We do not necessarily disagree with that definition, since “worship” is a broad term that encompasses many activities (for example, Black’s Law Dictionary defines public worship as “[w]orship conducted by a religious society according to the society’s system of ecclesiastical authority, ritual propriety, and rules and regulations.”)² and the leaders of St. Tim’s and other congregations regularly refer to their

¹ Staff Report at 12.

² *Worship*, BLACK’S LAW DICTIONARY (11th ed. 2019).

service of the poor as “worship.” However, Staff chooses to narrowly define “worship” as including only sermons held for the public at a church service (typically on Sundays). This narrow definition is not consistent with the activities churches typically engage in and is not a reasonable reading of the BMC.


“Church” use should be defined as encompassing both sermons and the typical activities churches engage in during the week as part of their ministry. Service ministries are a key tenant of the Christian faith and churches regularly engage in serving the poor. The Staff Report states that St. Timothy’s has not provided sufficient evidence of the fact that services for the poor are a typical church use. Several members and leaders of nearby churches have submitted letters to the record regarding their service ministries and their experience with churches as people of faith and leaders who have devoted their lives to ministry. In addition to this testimony from religious experts, we have attached the following evidence of church service activities. These activities, many of which are occurring in residential zones in Brookings, are examples of church service to the poor. The types of service ministry St. Tim’s engages in (as clarified above) are typical church functions and must be included in the City’s interpretation of “church” use.

- **Clarification of St. Tim’s use, history and service as part of church use**
 - Letter from Reverend Bernard Lindley
 - Letter from Sister Cora Rose
- **A day program that provides showers, internet and weekly HIV/HEP-C screening is a typical church use:**
 - Jackie Rehwald, *New Church in North Springfield Partners with Gathering Friends to Serve Poor, Homeless* (July 21, 2019), <https://www.news-leader.com/story/news/local/ozarks/2019/07/21/new-church-north-springfield-focuses-those-poverty-homeless/1760513001/>;
 - *The Connecting Grounds, Get Involved*, <https://www.theconnectinggrounds.com/getinvolved> (last visited June 16, 2023).
- **A legal clinic is a typical church use:**
 - Neighborhood Christian Legal Clinic, *Home*, <https://www.nclegalclinic.org/> (last visited Apr. 23, 2023)
 - Fame Church LA, *FAME Legal Clinic*, <https://www.famechurchla.org/free-legal-clinic/> (last visited Apr. 23, 2023)
 - Catholic Charities of Oregon, *Immigration Legal Services*, <https://www.catholiccharitiesoregon.org/services/immigration-legal-services/> (last visited June 16, 2023)
- **An advocacy team/caseworker assistance is a typical church use:**
 - Brookings Nazarene, *Community Care*, <https://www.brookingsnaz.org/community-care> (last visited Apr. 21, 2023)

- Catholic Charities of Oregon, *Services*,
<https://www.catholiccharitiesoregon.org/services/> (last visited June 16, 2023)³

Thank you for your time and consideration.

Very truly yours,



Allison J. Reynolds

³ In our request for appeal, we included a variety of sources that showed other church activities that could be considered social services but were allowed. We have not listed those articles here, but still attached them to our submission.

July 18, 2023

VIA EMAIL

Planning Commission
Attn: Lauri Ziemer
City of Brookings
898 Elk Drive,
Brookings, OR 97415

Re: Final Legal Argument in Support of St. Timothy's Church Appeal of the April 14, 2023, Notice to Abate.

Dear Planning Commission Members:

This office represents St. Timothy's Episcopal Church ("St. Tim's") in the above referenced matter. St Tim's operates a church use ("Church") at the subject property at 401 Fir Street ("Property"). St. Tim's received a Notice to Abate issued by the City of Brookings (the "City") on April 14, 2023. During the public hearing, we requested and received the opportunity to submit final legal argument.

Introduction

The City's Notice to Abate ("Notice") does not identify any actual harms or impacts from St. Tim's operations at the Property on the surrounding community. Even the testimony in support of the Notice (opposing the appeal), recognized that restricting St. Tim's religious activities rather than addressing purported impacts (of which there is no evidence in the record), was inappropriate and seemed confusing. City staff interprets the Brookings Municipal Code ("BMC"), which allows a "church" in residential zones, to mean that only church "worship" activities (which staff argues include only prayer and sermons) are authorized or can be authorized, while any other activities are not an allowed aspect of church use. This is an absurdly narrow interpretation of the term "church" that unduly restricts religious practice. Staff seems to imply that this narrow definition of "church" applies only in residential zones, but fails to recognize that a "church" use is authorized only in the City's residential zones, and there are

not any zones in the City that allow both “church” and “social services” where a church could practice its faith through service to the poor.¹ Staff’s interpretation prohibits churches in Brookings from providing services to the poor as part of their church use, City-wide. The Notice does not identify any interest, much less a compelling interest, that the City is attempting to serve by imposing these restrictions. The City must interpret its code consistent with state and federal law which protect religious practice from arbitrary restrictions and allow the free exercise of religion.

People have organized to practice their faith for centuries, while zoning restrictions are a fairly recent development. The situation the City faces here is common: a church, established long before City zoning regulations, has a right to continue operating but the parameters of the use are not clear in the way a decision to establish a same church use today might be. To determine if the Notice is valid, the Planning Commission must first determine what a “church” use, which St. Tim’s has the undisputed right to continue at the Property, encompasses. This term is not defined in the BMC, so is a matter of interpretation. We argue and the evidence in the record shows that “church” use includes worship through service to the poor in the manner provided by St. Tim’s. If a church use under the BMC includes services to the poor, the inquiry ends there since St. Tim’s is authorized to conduct a church use at the Property. The record includes overwhelming evidence that a “church” use includes the types of religious services cited in the Notice.

However, if the Planning Commission determines that the activities that St. Tim’s engages in are *beyond* the scope of “church” use under the Code (and “church” does not include services to the poor), whether St. Tim’s has the right to continue its specific activities depends on whether St. Tim’s de facto or specifically granted conditional use permit authorizes these activities. The evidence in the record shows that St. Tim’s has provided services to the poor since its establishment under its de facto conditional use permit. The City reauthorized St. Tim’s use and allowed an expansion in 1999. St. Tim’s service to the poor prior to 1999 are very similar to the services it provides today and have continue since the time the Church expansion was authorized by the 1999 conditional use permit. Even if the Planning Commission determines that “church” as defined in the BMC does not encompass some of St. Tim’s service to the poor, St. Tim’s has a legal right to continue its service activities because these are authorized by its de facto conditional use permit and reauthorized by the 1999 conditional use permit.

Argument

¹ We note that “places of worship” (also not a defined term) is an allowed use in the certain commercial zones, but “social services” (also not a defined term) is not an allowed use in any of these zones.

The City receives significant deference to plausible interpretation of provisions of its own code and so long as the interpretation is not contrary to law.² An interpretation is plausible when the City interprets the term consistently with its expressed language and purpose or underlying policy.³ Even if an interpretation is plausible, that interpretation cannot be contrary to state and federal law.⁴

A. St. Tim’s service ministries are a facet of typical “church” use and an expected part of the use that a church would conduct on its property. The City’s interpretation of “church” use must include these service ministry components.

The staff report urges this Commission to adopt an unreasonably narrow definition of “church” use that is clearly contrary to the general understanding of what a “church” use typically involves or could involve. The record clearly establishes that service to the poor, also known as almsgiving, is a central tenant of Christian faith. Typical church activities *also* include weekly hours when a church opens its doors to the community for fellowship and counseling.

The Staff Report concludes that a church use only includes “worship,” not any other religious activities, and then chooses to narrowly define “worship” (also undefined in the BMC) to include only sermons and pray activity. Other definitions of worship are broader and include the service ministries performed by St. Tim’s. Merriam-Webster also defines worship as an act that honors or shows reverence for a divine being.⁵ This definition is more consistent with other dictionaries and common conceptions of the duties of a church in performing worship than the definition selected by staff. As another example, Black’s Law Dictionary defines public worship as “[w]orship conducted by a religious society according to the society’s system of ecclesiastical authority, ritual propriety, and rules and regulations.”⁶ This broad definition captures both

² *Siporen v. City of Medford*, 349 Or 247, 261, 243 P3d 776 (2010); *Estroff v. City of Dundee*, 79 Or LUBA 189, 192-93 (2019).

³ *Klein v. Lane County*, 80 Or LUBA 287, 290 (2019); *id.*

⁴ U.S. Const., Art. VI; *Klein*, 80 Or LUBA at 290.

⁵ Merriam-Webster, *Worship*, <https://www.merriam-webster.com/dictionary/worship> (July 12, 2023); *see also*, *Worship*, WEBSTER’S THIRD NEW INTERNATIONAL DICTIONARY (3d ed. 2002); Cambridge English Dictionary, *Worship*, <https://dictionary.cambridge.org/us/dictionary/english/worship> (last visited July 12, 2023) (showing “a strong feeling of respect and admiration for God or a god”); Dictionary.Com, *Worship*, <https://www.dictionary.com/browse/worship> (last visited July 12, 2023) (“homage paid to God or a sacred personage, or to any object regarded as sacred”); The Britannica Dictionary, *Worship*, <https://www.britannica.com/dictionary/worship> (last visited July 12, 2023) (“to show respect and love for God or for a god”).

⁶ *Worship*, BLACK’S LAW DICTIONARY (11th ed. 2019).

prayers to a divine being and other religious practices like the provision of social services to the needy.

The City received testimony from other churches in the region confirming that they also provide “social services” including, a place to charge electronics, dance lessons, financial assistance, food bags, NA and AA meetings, bathrooms, community gardens, on-site counseling, refugee services, and housing education among many other services to the needy. Local citizens also testified about their experience with churches and the integral nature of service ministry to a church use. For example, Pastor Jon Meyers indicated that his church, located in a residential zone in Grants Pass, has several programs that would be described as “social services” that serve people outside of the congregation. Reverend Linda Lee and Louise Abbott both noted that a warm welcome to a stranger or someone in need is an act of worship.

Given the common understanding of church use in the community and beyond, it is not plausible for the City to interpret the “church” use category to exclude service ministries like the activities occurring at St. Tim’s which are a typical part of church use.

B. While the City has considerable leeway when interpreting its own Code, any interpretation must be consistent with federal and state law.

Religious practices are protected by the Oregon Constitution and the laws of the State of Oregon.⁷ This is especially true in situations like this where the City has not identified any compelling or even rationale interest for restricting the use of churches in Brookings to such a narrow set of activities.

There is also strong protection for churches practicing their faith under the Religious Land Use and Institutionalized Persons Act (“RLIUPA”). Congress passed this law after local communities used their zoning restrictions to prevent the establishment of faith communities in certain areas and restrict the types of activities churches could engage in. The law recognizes that providing services to the poor is an essential tenant of Christian faith in all its forms. Assuming there is another zone and property where a church can practice (which is not the case in Brookings), the law *also* recognizes that requiring a church to move its ministry to the poor to another location is a substantial burden on a church's practice of its religion. A determination that defined Church as narrowly as staff is proposing here would directly contravene RLUIPA.

⁷ Or Const., Art I, §§ 2-3.

Moreover, in Brookings, where there are not *any* zones that allow “social services” and there are no zones that allow a church to conduct these types of activities.

C. **St. Tim’s service ministry is part of its established conditional use and allowed to continue.**

The staff report finds, and we agree, that St. Tim’s established a “church” at the Property prior to the enactment of the BMC and, as such, has a “de facto” conditional use to continue that church use. The staff report also finds that St. Tim’s received a conditional use permit for alternations to the building and expansion of the church use in 1999, which provides conditional use authorization for the activities occurring at that time. During this formal evaluation of the activities occurring at St. Tim’s, which included a public hearing, the City did not impose any additional restrictions on St. Tim’s use or “social service” activities.

The evidence submitted shows that St. Tim’s has continually, since its establishment, provided services to the poor. The evidence also shows that St. Tim’s was providing “social services” of the same type and in the same manner at the time the City granted the 1999 conditional use permit as St. Tim’s provides today.

As far as we are aware, the BMC language addressing “church” use at the time the City evaluated St. Tim’s conditional use in 1999 is identical to the BMC language today. If St. Tim’s service to the poor in 1999 was not an allowed part of its “church” operations the City should not have approved an expansion of the church use without conditions addressing or disallowing the service ministry. Instead, the City *did* approve the church expansion and found that there would be little to no impact on the surrounding neighborhood from the expansion of the church use.

Father Bernie testified that prior to the Church’s expansion in 1999, the church held the same office hours as today (Monday, Wednesday, and Friday from 9 am to noon). During that time, the same activities that occur today were occurring. As Father Bernie put it, “people were able to use the shower, have fellowship with others, and receive advice on a range of topics.” (July 3, 2023 Letter from Father Bernie, 2). Today, those same services are offered during office hours, and are also referred to as the “day program,” “advocacy program,” and “legal clinic.”

Father Bernie also provided testimony that a shower was added during an expansion of the church in the early 1980s. This was not put in for anyone living on the property, but rather as something community members can use. Allowing those seeking fellowship to use the shower as a part of St. Tim’s alms-giving practice has continued since the shower was installed in the

early 1980's and was ongoing in 1999. The same shower is available for use in the same manner today during St. Tim's office hours.

In sum, since St. Tim's establishment at the property, it has done what every church does. In addition to providing regular services for prayer and sermons, it provides services to the poor. The evidence on the record, including dictionary definitions, churches nationwide, and even testimony from local citizens, provides overwhelming evidence that a "church" use includes the religious services offered by St. Tim's. Even if St. Tim's activities are outside the scope of a "church" use in Brookings, St. Tim's has a right to continue to offer these services because they are similar in type and manner to the services authorized by its de facto conditional use permit and reauthorized by the 1999 conditional use permit.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Allison J. Reynolds". The signature is fluid and cursive, with the first name "Allison" being more prominent than the last name "Reynolds".

Allison J. Reynolds

**BEFORE THE PLANNING COMMISSION
CITY OF BROOKINGS, COUNTY OF CURRY
STATE OF OREGON**

In the matter of Planning Commission File No. APP-1-23; an Appeal of a Notice of Abatement issued April 14, 2023 to St. Timothy's Episcopal Church)))))	Final ORDER, Findings of Fact, and Conclusions of Law
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ORDER denying an Appeal of a Notice of Abatement issued April 14, 2023 to St. Timothy's Episcopal Church; Assessor's Map 4113-05BC, Tax Lot 07300; zoned R-1-6 (Single Family Residential).

WHEREAS:

1. The Planning Commission duly accepted the appeal filed in accordance with the Brookings Municipal Code (BMC), pursuant to Chapter 8.15.090 - General abatement procedure; Chapter 17.156 - Appeal to Planning Commission; Chapter 17.01 Section 17.01.040 – Compliance with Code Provisions; Chapter 17.20.040.B. - Conditional uses. (in SINGLE-FAMILY RESIDENTIAL (R-1) DISTRICT); and Chapter 17.120.010 - Continuation of a nonconforming use; and
2. The Brookings Planning Commission duly set this matter upon the agenda of a public meeting and considered the above described appeal with the public hearing a matter of record of the Planning Commission meetings of June 27, 2023 and August 1, 2023; and
3. At the public meeting on said appeal, evidence and testimony was presented by the Appellant, those in favor of the appeal, and those opposed to the appeal; and recommendations were received from and presented by staff in the form of a Staff Report, dated June 15, 2023 and oral presentation of same; and
4. At the conclusion of the public hearing, after consideration and discussion of testimony and evidence presented in the public hearing, the Planning Commission, upon a motion duly seconded, accepted the Staff Agenda Report and **DENIED** the appeal and directed staff to prepare a Final Order, Findings of Fact, and Conclusions of Law to that effect.

THEREFORE, LET IT BE HEREBY ORDERED that the appeal is DENIED. This denial is supported by the following findings and conclusions:

CRITERIA, FINDINGS, AND CONCLUSIONS

BMC 17.156.010 provides:

In the event of an ambiguity in this title affecting enforcement, the Planning Commission shall have the power to hear and decide appeals from administrative interpretations and to declare the meaning and intent, and interpret the provisions of this code. In thus resolving ambiguities, being considered in this appeal, the Planning Commission shall so interpret this code as to carry out BMC [17.01.020](#) and the expressed purpose of the zoning district involved.

The express purpose of the R-1-6 residential Zone, as stated in BMC 17.20.010 is:

To promote and encourage a suitable environment for family living and to protect and stabilize the residential characteristics of the district, the R-1 district is intended to provide for single-family residential homes at urban standards.

BMC 17.20.040.B allows churches in the R-1-6 as a conditional use. BMC Chapter 17.136 governs the process for obtaining a conditional use permit.

St. Timothy's Church existed and was operating prior to 1989, when the Brookings Land Development Ordinance was adopted. Therefore, the Church was considered to be a legal non-conforming use at that time.

BMC 17.120.010 (Continuation of a nonconforming use) provides that a lawfully preexisting use of a structure or site, which does not conform to the regulations for the district in which it is located, shall be deemed to be a lawful, nonconforming use, and may be continued, subject to regulations regarding maintaining, moving, altering, or enlarging the nonconforming structure. The BMC does not contain any provisions regarding altering or increasing the activities occurring on or within the property or the nonconforming structure.

In 1999, the church applied for a minor change to its CUP to "accommodate" its "growing congregation." See Pages 19-35 of the June 27, 2023 Planning Commission Agenda Packet. The 1999 minor amendment to the CUP was for a 392 square foot addition to the chapel area to add approximately 20 additional seats, as well as an additional 8 parking spaces.

There was no evidence submitted to the record during the 1999 minor amendment process which sheds any light on what activities were being held at the church at that time. It is clear from the 1999 record that approved minor amendment to the CUP dealt strictly with the physical expansion of the church's chapel area and the addition of parking spaces, both of which were needed to accommodate a growing congregation. No mention of any types of "alms" or "social services" can be found in the 1999 minor amendment record.

In its April 24, 2023, appeal letter, the Church asserts that it has continuously conducted "social services" since its establishment (prior to adoption of the Brookings Land Development Ordinance in 1989), but provides no evidence to support that assertion.

In two letters submitted to the record as part of the abatement appeal, Reverend Bernie Lindley, the pastor of St. Timothy's Church, asserts that "alms" have been provided at the Church since its inception. His letters state that originally, these alms took the form of financial assistance to people for things such as rent, utilities, bus tickets, and gasoline. Rev. Lindley states that in the 2000's a shift occurred in what types of alms visitors needed, and that the Church began providing clothing, personal hygiene items, and car repair assistance for those in need. See June 27, 2023 Lindley letter (Pages 7-11 of "Supplemental Planning Commission Packet") and July 3, 2023 Lindley letter (Pages 5-7 of Supplemental Planning Commission Packet II).

According to Rev. Lindley's June 27, 2023 letter, the Advocacy Program includes assistance to visitors in obtaining birth certificates and identification cards, enrolling in health insurance, connecting to therapy and treatment, applying for jobs and housing, and providing referrals to service providers. In addition,

the Advocacy Program includes assistance to visitors from a licensed attorney who offers counseling and advice to individuals with questions about issues such as citations, court fines, records expungement, SSI, food stamp benefits and who need referrals to attorneys with various skills.

In an April 12, 2023 deposition, Rev. Lindley stated that the "Advocacy Program" began in "approximately" 2018. This statement provides evidence that the Advocacy Program began many years *after* the church was established. This shows that the nonconforming use and/or unpermitted conditional use was altered and/or expanded in 2018, and the Church should have requested a modification to its conditional use permit for these uses. See excerpt of Lindley deposition, Attachment D to June 15, 2027 Planning Commission Staff Agenda Report.

In determining whether a nonconforming use has been established, and the extent of the nonconforming use, a factual determination is needed regarding what uses were in place at the Church in 1989 (when the Land Development Ordinance was adopted). The Church has the burden of proving both that the use existed in 1989, and what the level of use was at that time. See *Lane County v. Bessett*, 46 Or App 319, (1980); *Tylka v. Clackamas County*, 28 Or LUBA 417 (1994); *Fraley v. Deschutes County*, 32 Or LUBA 27, aff'd, 145 Or App 484 (1996); *Smith v. Lane County*, 21 Or LUBA 228 (1991).

A similarly analysis governs the determination of whether the type and scope of activities permitted by the 1999 minor change to the conditional use permit have been changed or expanded – the Church has the burden of proving both that the use existed in 1999, and what the level of use was at that time.

The Church has not met its burden of proving that the types and scope of the "social services" it is providing currently have been continuously provided since 1989 (when the City adopted its Land Development Code and at which point the church became a legal nonconforming use) and/or since 1999 (when the Church applied for and was granted a minor change to its conditional use).

Therefore, the Planning Commission determines that the abatement notice issued by the City on April 14, 2023 was properly issued. The Church is required to abate the types and level/scope of "social service" activities that it is currently providing and apply for an amendment to its conditional use permit to conduct such activities at the Church location.

Dated this 5th day of September, 2023

ATTEST:


Skip Watwood, Chair
Brookings Planning Commission


Anthony Baron, PWDS Director



October 18, 2023

VIA EMAIL

City Council
Attn: Lauri Ziemer
City of Brookings
898 Elk Drive,
Brookings, OR 97415

Re: First Evidentiary Submission and Argument before the City Council in Support of St. Timothy's Church Appeal of the April 14, 2023, Notice to Abate.

Dear City Council Members:

We represent St. Timothy's Episcopal Church ("St. Tim's") in its appeal of the City's Notice to Abate ("Notice"), which directed St. Tim's to cease operation of "social services" at its property at 401 Fir Street ("Property") where it operates a church use ("Church"). In its September 5 Order, the Planning Commission denied St. Tim's appeal of the Notice but did not address substantial evidence in the record or St. Tim's arguments regarding the permissible bounds of a "church" use within the City's residential zoning districts. The Planning Commission also misconstrued the nature of St. Tim's established church use at the Property, which St. Tim's has a 'de facto' conditional use right to continue.

We urge this Council to overturn the Planning Commission Order and grant St. Tim's appeal of the Notice. We ask the Council to address St. Tim's evidence and arguments and find that a "church" use encompasses the types of social service activities that St. Tim's conducts which are identified in the Notice. We also ask the Council to find that St. Tim's de facto conditional use authorization for a "church" use includes worship through providing these services. Finally, as required under Brookings Municipal Code ("BMC" or "Code") 8.15.090, which governs appeals of enforcement notices where there is an ambiguity in the Code, we ask the Council interpret the allowed boundaries of a "church" use in the City's residential zones to encompass the "social services" identified in the Notice and similar activities commonly conducted by churches as shown by evidence in the record.

Introduction and Attached Evidence

The Notice identified three specific activities it considered “social services” and directed St. Tim’s to stop these specific services or file a conditional use permit to abate its violation because the activities were not permitted at the Property. The specific “social services” were an “outreach clinic, a day program, and an advocacy program.” *See* Appendix C. The Notice also directed St. Tim’s to stop its meal service program and apply for a conditional use permit to allow St. Tim’s to serve meals. Because the meal service is the subject of an ongoing federal lawsuit, St. Tim’s and the City agreed to stay all enforcement associated with the meal service. The appeal now before this Council pertains only to St. Tim’s conduct of the listed “social services” at the Property.

Attached to this letter is a table (Exhibit A) identifying and explaining the evidentiary support St. Tim’s is providing in support of its arguments. The evidence is attached in Appendix A – EE. Most of this evidence was presented to the Planning Commission but Staff directed us to resubmit these materials for the Council’s consideration.

Argument

Like many churches that serve communities in Oregon, St. Tim’s Church was established before zoning was regulated in Brookings. Later zoning regulations restricted the Property for residential use and imposed a requirement for a conditional use permit to operate a “church.” It is undisputed that St. Tim’s has a ‘de facto’ conditional use permit that allows it to continue operating the Church.

For your consideration during these proceedings, St. Tim’s reasserts and provides further support in favor of the arguments raised before the Planning Commission: **First**, a “church” use under the BMC *encompasses* the types of “social services” activities practiced by St. Tim’s and many area churches – these acts of Christian service are so fundamental to church use that specific authorization for these activities is not necessary when a church use is allowed on a property (as it is here through St. Tim’s de facto conditional use to maintain a “church” on the Property). **Second**, the “social services” are part of the church use St. Tim’s has conducted since before the City’s zoning regulations made churches a conditional use under the Property’s zoning and therefore St. Tim’s has the right to continue these uses at the Property. **Third**, the City Council must interpret the BMC consistent with state and federal law and has not identified any basis or state interest for restricting St. Tim’s religious practice on its Property or for restricting similar religious practices at other churches in residential zones.

A. The “social services” identified in the Notice to Abate are typical “church” uses and encompassed within the term “church” under the BMC.

To determine if the Notice is valid, the City Council must first determine what a “church” use, which St. Tim’s has the undisputed right to continue at the Property, encompasses. This term is not defined in the BMC, so is a matter of interpretation. The evidence in the record shows that “church” use includes worship through service to the poor in the manner provided by St. Tim’s. If a church use under the BMC encompasses services to the poor, the inquiry ends there since St. Tim’s is authorized to conduct a church use at the Property.

All of the evidence in the record shows that the “social services” identified in the Notice are typical church activities that are properly considered a “church” use under the BMC. *See*, Appendix C-EE. These acts of Christian service are so fundamental to the Christian religious practice that these are considered a part of the activities a “church” use encompasses. During the Planning Commission hearing, the sole testimony in support of the Notice (opposing the appeal) also recognized that restricting St. Tim’s religious activities by referring to these as “social services” rather than addressing purported impacts (of which there is no evidence in the record) was inappropriate and seemed confusing. *See* Appendix C.

The only support for denial of St. Tim’s appeal was within the Planning Commission Staff Report issued on June 15, 2023. City staff interpreted the BMC to mean that only church “worship” activities (which Staff argues include only prayer and sermons) are authorized or can be authorized, while any other activities are not an allowed aspect of church use. Staff seemed to imply that this narrow definition of “church” applies only in residential zones but fails to recognize that a “church” use is authorized only in the City’s residential zones.¹ In addition, this interpretation ignores that nearly all churches in Brookings are in a residential zone. *See*, Appendix B (table describing zones of churches in Brookings). Given these conditions, Staff’s interpretation prohibits churches in Brookings from providing services to the poor as part of their church use, City-wide. This narrow definition, which was not discussed by the Planning Commission in the Order, is fundamentally out of step with the typical use of a church and the practice of the Christian faith.

¹ We note that “places of worship” (also not a defined term) is an allowed use in the certain commercial zones, but “social services” (also not a defined term) is not an allowed use in any of these zones.

St. Tim's argued to the Planning Commission, and still maintains, that a "church" use *necessarily* includes activities regularly conducted by churches at church properties. These include the activities identified in the Notice.

B. Even if this Council determines that the activities identified in the Notice are not typical "church" uses, St. Tim's has provided "social services" since before the BMC was adopted, and, therefore, has a right to continue the activities identified in the notice as part of its de facto conditional use.

If the City Council determines that the activities that St. Tim's engages in are *beyond* the scope of "church" use under the BMC (and "church" does not include services to the poor), whether St. Tim's has the right to continue its specific activities depends on whether St. Tim's de facto or specifically granted conditional use permit authorizes these uses.

The Planning Commission's Order incorrectly determined that St. Tim's did not meet its burden of proving that the types and scope of "social services" identified in the Notice were the same activities being conducted on the Property in 1989 and/or 1999. The Order the evidence in the record that St. Tim's has provided "social services" to the poor since 1989 and/or 1999. *See*, Appendix C (Letter from Father Bernie). The exact words "day program" and "advocacy program," which are terms that seek to clarify the Church activities for those seeking service and fellowship, were not used in 1980s and 90s but the activities that were occurring are the same or very similar. St. Tim's argued before the Planning Commission and continues to maintain that the activities identified in the Notice are part of St. Tim's authorized use because the Church has always held its doors open to those in need on Mondays, Wednesdays, and Fridays from 9 am to noon.

The Planning Commission's order also attempts to relieve the City of its obligation to consistently interpret the BMC language regarding churches in residential zones, which language appears to be identical today and in 1999. In 1999 the City granted a conditional use permit for the Property that authorized St. Tim's use and allowed an expansion. Appendix C. The same and similar "social services" activities that are occurring today were occurring in 1999 when the City issued this conditional use authorization. If these activities were not allowed as part of St. Tim's "church" use, the City should not have allowed St. Tim's Church to expand without imposing conditions addressing or disallowing the "social services" because the Property would have been out of compliance with the code under BMC 17.01.040. St. Tim's services to the poor prior to 1999 are very similar to the services it provides today and have continued since the time the Church expansion was authorized by the 1999 conditional use permit. Appendix C (Staff Report Attachment). Based on the evidence in the record, St. Tim's has a legal right to continue

its service activities because these are authorized by its de facto conditional use permit and reauthorized by the 1999 conditional use permit.

C. A narrow definition of “church” restricts religious practice in violation of the U.S. and Oregon constitutions and federal law.

The City must interpret the BMC consistent with state and federal law which protect religious practice from arbitrary restrictions and allow the free exercise of religion. Under these provisions the City must have a compelling or even rational interest in restricting the religious practice of churches in Brookings.

The Religious Land Use and Institutionalized Persons Act (“RLIUPA”) provides strong protections to churches practicing their faith. Congress passed this law in response to zoning restrictions placed on churches by local governments prevented the establishment of faith communities in certain areas or restricted the type of activities a church could engage in. These protections include activities related to a church’s practice of providing services to the poor, an essential tenant of faith in all its forms. To restrict a church’s activity, the local government must provide another zone where the church can conduct that activity and it must not be a substantial burden on the church’s practice to relocate to that zone. Defining a church use as narrowly as Staff has proposed violates this statutory protection.

The Notice also does not identify any interest, much less a compelling interest, that the City is attempting to serve by restricting church uses so narrowly. In addition, the interpretation of “church” use advanced by the Staff Report is incredibly narrow and out of step with the reality of church operations. Adopting the interpretation in the Staff Report would contravene federal and state law by arbitrarily limiting the activities of a church to a narrow definition of “worship.”

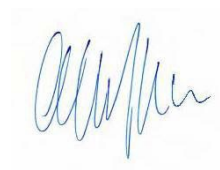
Conclusion

In sum, since St. Tim’s establishment at the Property, it has done what every church does. In addition to providing regular services for prayer and sermons, it serves the needy. The evidence on the record, including dictionary definitions, examples of programs at churches nationwide, and testimony from local citizens with experience with various churches, provides overwhelming evidence that a “church” use includes the types of religious services offered by St. Tim’s. Even if the Council finds that St. Tim’s activities are outside the scope of a “church” use in Brookings, St. Tim’s has a right to continue to offer these services because they are similar in type and

manner to the services authorized by its de facto conditional use permit and reauthorized by the 1999 conditional use permit.

We respectfully request that the City Council overturn the Planning Commission's Order and grant St. Tim's appeal.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Allison J. Reynolds", is positioned above the printed name.

Allison J. Reynolds

EXHIBIT A

List of Evidentiary Submissions	
Appendix A	Table describing St. Tim's activities
Appendix B	Table describing zones of churches in Brookings, Oregon
Appendix C	Planning Commission Record
Appendix D	Oregon New Lawyers Division, Invite to Annual Meeting (Oct. 10, 2023) (noting that Sr. Cora will receive a Public Service Award for her pro-bono work at St. Tim's)
Appendix E	Oregon Public Health Association, <i>Annual Conference and Meeting: 2023 Featured Presentations</i> , https://www.oregonpublichealth.org/2023-featured-presentations-events (last visited Oct. 18, 2023) (describing the work done at St. Tim's under Fr. Bernie's speaker bio, including the vaccine clinic and the wrap-around support offered for people that tested positive for COVID-19 during the pandemic. Fr. Bernie was asked to join a panel that discussed Oregon at the Intersection of Homelessness and Public Health providing a perspective from faith-based organizations)
Appendix F	Brookings Presbyterian Church, Flyer, October Events (Oct. 2023) (noting that the church provides weekly alcoholics anonymous meetings and a monthly breakfast, among other activities)
Appendix G	Letter of Support from Nativity Lutheran Church (Oct. 14, 2023)
Appendix H	St. Timothy's, <i>Advocacy Team Brochure</i> (2022)
Appendix I	St. Timothy's, <i>Authorization to Release Information</i> (2023) (referral checklist for people seeking aid from St. Tim's and describing activities of the advocacy team and Sr. Cora's legal aid)
Appendix J	St. Timothy's, <i>Legal Advocacy Ministry Poster</i> (2023) (describing Sr. Cora's legal aid services)
Appendix K	Letter in Support from David Hunter (Retired Pastor)
Appendix L	Central Washington Justice for Our Neighbors, <i>What We Do</i> , https://www.cwjfon.org/ (last visited Oct. 17, 2023) (describing legal aid services offered out of Pioneer United

	Methodist Church and Ellensburg United Methodist Church)
Appendix M	Administer Justice, <i>Church Leader</i> , https://www.administerjustice.org/churchleader/ (last visited Oct. 17, 2023) (describing how Administer Justice partners with churches to provide legal services)
Appendix N	The Cathedral of Christ the Light, <i>About the Clinic</i> , https://ctlcathedral.org/about-the-clinic (last visited Oct. 17, 2023) (describing the services provided by the Pope Francis Legal Clinic in Oakland, CA)
Appendix O	Immigration Law & Justice Network, <i>How We Help</i> , https://iljnetwork.org/what-we-do/how-we-help/ (last visited Oct. 17, 2023) (describing the partnership between Immigration Law and Justice Network and local churches).
Appendix P	Immigrant Hope, <i>Join Immigrant Hope</i> , https://www.immigranthope.org/join-immigrant-hope/ (last visited Oct. 17, 2023) (describing the work Immigrant Hope, a network of church-based immigration legal aid clinics, does)
Appendix Q	Administer Justice, <i>List of Clinics</i> , https://www.administerjustice.org/gethelp/ (last visited Oct. 17, 2023) (noting that Administer Justice works out of churches)
Appendix R	Catholic Legal Immigration Network, Inc., <i>Find a Local Affiliate</i> , https://www.cliniclegal.org/find-legal-help/affiliates/directory (Oct. 17, 2023) (listing churches that provide legal services in Oregon)
Appendix S	Administer Justice, Justice Made Simple One-Pager (describing Administer Justice’s partnership with churches)
Appendix T	Administer Justice, 2022 Annual Report (2023) (describing the organizations growth to 36 new “Gospel Justice Centers”)
Appendix U	Arizona Justice of Our Neighbors, <i>History</i> , https://www.azjfon.org/about--sobre.html (Oct. 17, 2023) (describing how a United Methodist Immigration Ministry is providing low-cost legal services)
Appendix V	Administer Justice, <i>A Call to Gospel Justice</i> (describing link between religious practice and legal aid)

Appendix W	Christian Legal Aid of Los Angeles, <i>Flyer</i> (2023) (describing how the church provides legal clinics once a month including expungement of criminal convictions, family law, immigration, bankruptcy, probate, employment, small claims and small business)
Appendix X	Christian Legal Aid of Los Angeles, <i>What We Do</i> , https://www.cla-la.org/what-we-do.html (last visited Oct. 17, 2023) (describing how the organization works with churches to provide legal services)
Appendix Y	Brookings Nazarene, <i>Community Care</i> , https://www.brookingsnaz.org/community-care (last visited Oct. 18, 2023) (describing the food pantry and other ministries done by the Brookings Church of the Nazarene)
Appendix Z	Brookings Nazarene, <i>Mops</i> , https://www.brookingsnaz.org/mops (last visited Oct. 18 2023) (describing the Mothers of Pre-Schoolers Ministry meetings that occur at Brookings Church of the Nazarene on the 1 st and 3 rd Monday of each month between September and May)
Appendix AA	Brookings Nazarene Flyer, <i>Requesting Food Pantry Volunteers</i> (Oct. 2023)
Appendix BB	Brookings Nazarene, Flyer, <i>BeYouth Video Game Tournament</i> (Oct. 2023) (describing that Brookings Church of the Nazarene will host a game day for the community on October 28, 2023)
Appendix CC	Oregon-Idaho Conference of the United Methodist Church, <i>Abundant Health Ministries</i> , https://www.umi.org/abundanthealth (last visited Oct. 18, 2023)
Appendix DD	Oregon-Idaho Conference of the United Methodist Church, <i>Services provided by churches in Western Oregon</i> (Oct. 2023)
Appendix EE	Medical Teams International, List of Dental Van Services in Oregon (2023) (identifying churches that provide space for the Dental Van that provide urgent dental care for those in need)

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Appendix L	Central Washington Justice for Our Neighbors, <i>What We Do</i> , https://www.cwjfon.org/ (last visited Oct. 17, 2023) (describing legal aid services offered out of Pioneer United

	Methodist Church and Ellensburg United Methodist Church)
Appendix M	Administer Justice, <i>Church Leader</i> , https://www.administerjustice.org/churchleader/ (last visited Oct. 17, 2023) (describing how Administer Justice partners with churches to provide legal services)
Appendix N	The Cathedral of Christ the Light, <i>About the Clinic</i> , https://ctlcathedral.org/about-the-clinic (last visited Oct. 17, 2023) (describing the services provided by the Pope Francis Legal Clinic in Oakland, CA)
Appendix O	Immigration Law & Justice Network, <i>How We Help</i> , https://iljnetwork.org/what-we-do/how-we-help/ (last visited Oct. 17, 2023) (describing the partnership between Immigration Law and Justice Network and local churches).
Appendix P	Immigrant Hope, <i>Join Immigrant Hope</i> , https://www.immigranthope.org/join-immigrant-hope/ (last visited Oct. 17, 2023) (describing the work Immigrant Hope, a network of church-based immigration legal aid clinics, does)
Appendix Q	Administer Justice, <i>List of Clinics</i> , https://www.administerjustice.org/gethelp/ (last visited Oct. 17, 2023) (noting that Administer Justice works out of churches)
Appendix R	Catholic Legal Immigration Network, Inc., <i>Find a Local Affiliate</i> , https://www.cliniclegal.org/find-legal-help/affiliates/directory (Oct. 17, 2023) (listing churches that provide legal services in Oregon)
Appendix S	Administer Justice, Justice Made Simple One-Pager (describing Administer Justice’s partnership with churches)
Appendix T	Administer Justice, 2022 Annual Report (2023) (describing the organizations growth to 36 new “Gospel Justice Centers”)
Appendix U	Arizona Justice of Our Neighbors, <i>History</i> , https://www.azjfon.org/about--sobre.html (Oct. 17, 2023) (describing how a United Methodist Immigration Ministry is providing low-cost legal services)
Appendix V	Administer Justice, <i>A Call to Gospel Justice</i> (describing link between religious practice and legal aid)

Appendix W	Christian Legal Aid of Los Angeles, <i>Flyer</i> (2023) (describing how the church provides legal clinics once a month including expungement of criminal convictions, family law, immigration, bankruptcy, probate, employment, small claims and small business)
Appendix X	Christian Legal Aid of Los Angeles, <i>What We Do</i> , https://www.cla-la.org/what-we-do.html (last visited Oct. 17, 2023) (describing how the organization works with churches to provide legal services)
Appendix Y	Brookings Nazarene, <i>Community Care</i> , https://www.brookingsnaz.org/community-care (last visited Oct. 18, 2023) (describing the food pantry and other ministries done by the Brookings Church of the Nazarene)
Appendix Z	Brookings Nazarene, <i>Mops</i> , https://www.brookingsnaz.org/mops (last visited Oct. 18 2023) (describing the Mothers of Pre-Schoolers Ministry meetings that occur at Brookings Church of the Nazarene on the 1 st and 3 rd Monday of each month between September and May)
Appendix AA	Brookings Nazarene Flyer, <i>Requesting Food Pantry Volunteers</i> (Oct. 2023)
Appendix BB	Brookings Nazarene, Flyer, <i>BeYouth Video Game Tournament</i> (Oct. 2023) (describing that Brookings Church of the Nazarene will host a game day for the community on October 28, 2023)
Appendix CC	Oregon-Idaho Conference of the United Methodist Church, <i>Abundant Health Ministries</i> , https://www.umi.org/abundanthealth (last visited Oct. 18, 2023)
Appendix DD	Oregon-Idaho Conference of the United Methodist Church, <i>Services provided by churches in Western Oregon</i> (Oct. 2023)
Appendix EE	Medical Teams International, List of Dental Van Services in Oregon (2023) (identifying churches that provide space for the Dental Van that provide urgent dental care for those in need)

Name of Service	What services are provided?	When?	Operating today?
Outreach clinic	<ul style="list-style-type: none"> - COVID-19 testing and vaccinations 	Monday, Wednesday, Friday from 9 AM to noon	No
Day Program	<ul style="list-style-type: none"> - Showers - Provide hygiene, food, survival supplies and clothes - Provide laundry vouchers - Coffee, tea, light/continental breakfast and snacks - Mail pick-up - Place to read, relax, socialize, and charge phones - HIV Testing (administered by HIV Alliance) - Dental Van (administered through Medical Teams International) (several times throughout the year) 	Monday, Wednesday, Friday from 9 AM to noon	Yes
Advocacy Program (excluding Sr. Cora's pro bono legal services)	<ul style="list-style-type: none"> - Assistance in obtaining or enrolling in <ul style="list-style-type: none"> o birth Certificates and IDs o emergency financial aid for utilities, rent, foreclosure prevention, home and vehicle repair o public benefits (food stamps, temporary aid to needy families) o health insurance - Coordinate medical transport and support - Providing treatment and therapy referrals for substance use & mental health - Assisting with applications for jobs, housing, and disability insurance - Organizing transportation to support services. - Collaboration with partner agencies to find solutions for the south coast in increasing access to healthy food and housing - Other organizations help us provide this assistance during the hours the advocacy clinic is operating: <ul style="list-style-type: none"> o Adapt Peer Support (Always) o Brookings Community Resource Officer (2x per week) o Bay Area First Step (2-3x per month) o Coast Community Health (Mondays) 	Monday, Wednesday, Friday from 9 AM to noon	Yes

	<ul style="list-style-type: none"> ○ Advanced Health (Wednesdays) ○ Oregon Department of Human Services (2-3x per month) ○ Tolowa Nation Community & Family Wellness Services (1x per month) ○ Murphy Creek Wellness (1x per month) 		
Advocacy Program (Sr. Cora's pro bono legal services)	<p>As part of her role in the advocacy program, Sr. Cora provides pro bono/no cost legal service on the following matters:</p> <ul style="list-style-type: none"> - Citations for sleeping, parking or camping - Sweep notices and getting property back after a sweep - Removing barriers to work and housing: expungement of criminal records or housing records (evictions); driving license reinstatement; court fines and fees - For seniors only: applying for and receiving old-age minimum supplemental income from Social Security - Using or extending Housing Choice Vouchers (HUD/Section 8) - Food stamp (SNAP) benefits - Advanced healthcare directives <p>Sr. Cora refers out work related to</p> <ul style="list-style-type: none"> - Anything attorney fee generating - Impact litigation or other long-term matters - Criminal matters - Work handled by Oregon Law Center (Legal Aid) (family law, landlord-tenant, disability) - Wealth management (wills, trusts) 	Monday, Wednesday, Friday from 9 AM to noon	Yes

Zoning designations of churches in Brookings, Oregon		
Church	Address	Zone
Brookings Church of the Nazarene	1600 Chetco Ave, Brookings, OR 97415	R-1-6
Jehovah's Witnesses	1208 Ransom Ave, Brookings, OR 97415	R-1-6
Trinity Lutheran Church	1200 Easy St, Brookings, OR 97415	R-1-6
Grace Bible Church of Brookings	302 N Hazel St, Brookings, OR 97415	R-1-6
Brookings-Harbor Christian Church	777 5th St, Brookings, OR 97415	R-2 ¹
Living Waters Foursquare Church	1136 Fifield St, Brookings, OR 97415	R-3 ²
The Church of Jesus Christ of Latter-day Saints	770 Elk Dr, Brookings, OR 97415	R-3
First Baptist Community Church	607 Pacific Ave, Brookings, OR 97415	R-3
Brookings Seventh-Day Adventist Church	102 Park Ave, Brookings, OR 97415	R-3
First Church of Christ, Scientist	429 Pine St, Brookings, OR 97415	R-3
Brookings Presbyterian Church	540 Pacific Ave, Brookings, OR 97415	R-3
Assembly of God Calvary	518 Fir St, Brookings, OR 97415	R-3
Star of the Sea Catholic Church	820 Old County Rd, Brookings, OR 97415	R-3
Faith Baptist Church	409 Hillside Ave, Brookings, OR 97415	C-3 ³

¹ "Churches" are a conditional use in the R-2 Zone. BMC 17.24.040(C).

² "Churches" are a conditional use in the R-3 Zone. BMC 17.28.040(C).

³ "Churches" are neither permitted nor conditionally permitted in the C-3 zone. BMC 17.28.020; BMC 17.28.040. However, "Places for public assembly, such as places of worship" are permitted outright. BMC 17.28.020(I).

PLANNING COMMISSION AGENDA

CITY OF BROOKINGS
Council Chambers - 898 Elk Drive
June 27, 2023 at 7:00 PM



1. CALL TO ORDER - PLEDGE OF ALLEGIANCE
2. ROLL CALL
3. PLANNING COMMISSION CHAIR PERSON ANNOUNCEMENTS
4. PUBLIC HEARINGS - The below applications are Quasi-judicial hearings and the Planning Commission will make a decision on each of these matters.

4.1 In the matter of File No. CUP-7-23, a request for approval of a Conditional Use Permit to operate a Short Term Rental facility at 1111 Easy Street, Assessor's Map & Tax Lot No. 4113-05BD-01601; zoned R-1. The owner/applicant is Christy and Robert Bartneck. Criteria used to decide this matter can be found in Brookings Municipal Code Chapter 17, Sections: 17.20.040(Q) Single Family Residential Conditional Uses; 17.124.170 – Short-Term Rentals; and 17.136 - Conditional Uses.

4.2 In the matter of File No. APP-1-23, an appeal to the Planning Commission of a Notice of Abatement issued April 14, 2023 to St. Timothy's Episcopal Church, at 401 Fir Street, Assessor's Map & Tax Lot No. 4113-05BC-07300. Criteria used to decide this matter is found in Brookings Municipal Code Chapters 17.156 (Appeal to Planning Commission), 17.01.040 (Compliance with code provisions) and [17.124.050](#) (Benevolent meal service).

5. MINUTES FOR APPROVAL
 - 5.1 Minutes of Planning Commission meeting of May 2, 2023
6. UNSCHEDULED PUBLIC APPEARANCES
7. REPORT FROM THE PLANNING STAFF
8. COMMISSION FINAL COMMENTS
9. ADJOURNMENT

Unscheduled public appearances and comments are limited to 5 minutes. All public meetings are held in accessible locations. Auxiliary aids will be provided upon request with advance notification. You can view the Planning Commission meeting LIVE on television on Charter PEG Channel 181; stream it LIVE on a computer by copying and pasting the following link inside your web browser: <mms://68.185.2.46:8080>; or to stream it LIVE on a mobile device you will need to download the VLC Media Player which is available at: <https://or-brookings2.civicplus.com/252/Watch-Meetings-Live> and follow directions and links for your device.



City of Brookings

898 Elk Drive, Brookings, OR 97415
(541) 469-1103 Fax (541) 469-3650 TTY (800) 735-1232
www.brookings.or.us

PUBLIC WORKS AND DEVELOPMENT SERVICES DEPARTMENT

Email: May 30, 2023

Publish by: June 7, 2023 – Curry Reporter

NOTICE OF PUBLIC HEARING BEFORE THE BROOKINGS PLANNING COMMISSION

NOTICE IS HEREBY GIVEN that a public hearing will be held before the Brookings Planning Commission on Tuesday, June 27, 2023 at 7:00 PM in the Council Chambers of Brookings City Hall, 898 Elk Drive, Brookings, OR 97415. The below applications are Quasi-judicial hearings and the Planning Commission will make a decision on each of these matters.

1. In the matter of File No. CUP-7-23, a request for approval of a Conditional Use Permit to operate a Short Term Rental facility at 1111 Easy Street, Assessor's Map & Tax Lot No. 4113-06BD-01601; zoned R-1. The owner/applicant is Christy and Robert Bartneck. Criteria used to decide this matter can be found in Brookings Municipal Code Chapter 17, Sections: 17.20.040(Q) Single Family Residential Conditional Uses; 17.124.170 – Short-Term Rentals; and 17.136 - Conditional Uses.

2. In the matter of File No. APP-1-23, an appeal to the Planning Commission of a Notice of Abatement issued April 14, 2023 to St. Timothy's Episcopal Church, at 401 Fir Street, Assessor's Map & Tax Lot No. 4113-05BC-07300. Criteria used to decide this matter is found in Brookings Municipal Code Chapters 17.156 (Appeal to Planning Commission), 17.01.040 (Compliance with code provisions) and [17.124.050](#) (Benevolent meal service).

The public is invited to attend and participate in the public hearing. All persons wishing to address this matter will have an opportunity to do so in person at the hearing or by submitting written evidence to the Brookings Planning Department at the address above. If you wish to speak at the hearing, you will be asked to sign in and afforded five (5) minutes to speak. Failure to raise an issue accompanied by statements or evidence sufficient to afford the Planning Commission and parties an opportunity to respond to the issues precludes appeal to the Oregon Land Use Board of Appeals (LUBA).

A copy of the application, all documents and evidence submitted on behalf of the applicant is available for public inspection at no cost at the Brookings Planning Department, 898 Elk Drive, Brookings, OR. The staff report prepared in this case will be available seven days prior to the hearing. Copies of documents may be obtained at reasonable cost.

All public meetings are held in accessible locations, auxiliary aids will be provided upon request with advance notification. Please contact 541-469-1103 to make appropriate arrangements or for additional information. TTY 800-735-1232.

CITY OF BROOKINGS PLANNING COMMISSION
STAFF AGENDA REPORT

SUBJECT: Appeal to Planning Commission
FILE NO: APP-1-23
REPORT DATE: June 15, 2023

HEARING DATE: June 27, 2023
AGENDA ITEM NO: 4.2

GENERAL INFORMATION

APPLICANT/OWNER: Diocese of Oregon, St. Timothy's Episcopal Church

REQUEST: Appeal to the Planning Commission of a Notice of Abatement issued April 14, 2023 to St. Timothy's Episcopal Church

TOTAL LAND AREA: @.63 acres/@27,600 square feet

LOCATION: Subject property is located at 401 Fir Street.

ASSESSOR'S NUMBER: 4113-05BC Tax Lot 07300

ZONING / COMPREHENSIVE PLAN INFORMATION

EXISTING: R-1-6 (Single-family residential)

PROPOSED: Same

SURROUNDING: Subject property is surrounded by R-1 (Single-family residential) to the north, south and west and P/OS (Public Open Space) to the east

COMP. PLAN: Residential

LAND USE INFORMATION

EXISTING: Subject property is developed a with a two level church

SURROUNDING: The subject property is surrounded by residentially developed parcels to the north, south and west and Azalea Park to the east

PUBLIC NOTICE: Mailed to all property owners within 250 feet of subject property and published in local newspaper.

APPLICABLE CRITERIA: Land Development Code –

- a. Chapter 8.15.090 - General abatement procedure
- b. Chapter 17.156 - Appeal to Planning Commission
- c. Chapter 17. 01 Section 17.01.040 – Compliance with Code Provisions
- d. Chapter 17.20.040.B. - Conditional uses. (in SINGLE-FAMILY RESIDENTIAL (R-1) DISTRICT)
- e. Chapter 17.120.010 - Continuation of a nonconforming use

BACKGROUND INFORMATION

St. Timothy's Episcopal Church ("the Church"), located at 401 Fir Street, Brookings, Oregon, operates in the R-1-6 Single-Family Residential District under a "de facto" conditional use permit. The Church existed and was operating prior to 1989, when the Brookings Land Development Ordinance was adopted, and therefore was considered to be a legal non-conforming use at that time. (Attachments A & B - Vicinity Map/Property Photo).

In 1999, the Church applied for and was granted by the Planning Commission a "minor change" to its building (adding 392 square feet to the church building and adding 8 new parking spaces). (Attachment C – Minor Change to CUP documents)

In late 2022, the City became aware, through a variety of sources (review of the lawsuit complaint filed by the Church, the Church website) that the Church was operating a variety of services which are not typically associated with churches in residential zones. These services include a "day program", "legal clinic", and an "advocacy team/case worker assistance."

The City has also become aware of information suggesting that the number of people served by the Church's social services activities exceeds the number of church parishioners.

Confirmation that the Church was providing these "social services" was provided by Father Bernie Lindley's deposition, which was taken on April 12, 2023 as part of discovery in the lawsuit filed by the Church against the City. During the deposition, Fr. Lindley admitted the Church operates a "day program" on Mondays, Wednesdays, and Fridays from 9:00 AM until 12:00 PM.

This "day program" provides access to showers and internet services, as well as weekly HIV/HEP-C screening. Fr. Lindley also said that the Church operates a "legal" clinic for 19-20 hours per week. The Church also conducts an "advocacy team/case worker assistance" program during the same hours as the "day program" or other hours as needed. The Church has at least 6-7 paid employees for these activities, as well as several volunteers. Finally, the Church also hosts a primary health care provider one day a month. (Attachment D – Fr. Lindley deposition excerpts)

On April 14, 2023, the Church was issued a Notice to Abate (Attachment E) for operating a variety of social services, including an outreach clinic, a day program, and an advocacy program, in violation of 17.01.040 (Compliance with code provisions in the Brookings Municipal Code (BMC)). The church was notified that, in order to avoid enforcement and potential civil penalties, it must cease the operation of these activities, which are not allowed in an R-1-6 zone.

On April 24, 2023 letter, the Church's attorney sent a letter appealing the Notice to Abate. (Attachment F)

(NOTE: The abatement of operation of a Benevolent Meal Service without a conditional use permit is being suspended temporarily due to ongoing litigation between the church and the city. This temporary suspension of abatement of the operation of a Benevolent Meal Service without a conditional use permit may be lifted in the future. If the temporary suspension is lifted, the church will be issued a new Notice of Abatement of operation of a Benevolent Meal Service without a conditional use permit.)

AUTHORITY FOR PLANNING COMMISSION REVIEW

The BMC allows churches in the Single-Family Residential District with a conditional use permit per BMC 17.20.040.B. The BMC does not allow the operation of a "day program", and an "advocacy program", and a "legal clinic" in an R-1-6 Single-Family Residential District either outright or with a conditional use permit.

BMC 17.160.020 designates any violations of the Land Development Code as public nuisances that may be abated and removed under BMC 8.15.090. Failure to correct the violation could result in civil penalties of up to \$720.00 per day that the violation exists, per BMC 1.05.010.

The BMC does not provide for an objection or appeal to the City Manager on the substance of the abatement notice – it must either be appealed to municipal court, or, (as in this case) if it is a land use matter, to the Planning Commission.

BMC 8.15.090.C states that for BMC Title 17 cases (Land Development Code), “where the potential violation is a matter of ambiguity, the code enforcement officer determination of violation may be appealed to the planning commission pursuant to Chapter 17.156 BMC.”

BMC 17.156.010 provides:

“In the event of an ambiguity in this title affecting enforcement, the planning commission shall have the power to hear and decide appeals from administrative interpretations and to declare the meaning and intent, and interpret the provisions of this code. In thus resolving ambiguities, being considered in this appeal, the planning commission shall so interpret this code as to carry out BMC 17.01.020 and the expressed purpose of the zoning district involved.”

ANALYSIS, FINDINGS, AND CONCLUSIONS

The Church requests that the Planning Commission determine that the Church’s “social services” activities at its property do not violate the BMC for one or both of the following reasons:

- 1) these activities are “typical” functions conducted by churches and are considered part of a church use, and/or
- 2) these activities are part of the Church’s non-conforming use of the property and are allowed to continue.

The analysis for each of these requests is discussed below.

Are the Day Program, Advocacy Program, and Legal Clinic typical functions conducted by churches?

In the April 24, 2023 appeal letter, the Church asserts that the Day Program, Advocacy Program, and Legal Clinic are “typical functions” conducted by churches and therefore are allowed without having to seek any permission from the City.

In support of this assertion, the letter cites news articles and web sites that discuss different types of social services offered by various churches from around the nation. It is not apparent whether any of these churches are located in residential zones or have any other similarities to the matter currently before the Planning Commission.

In addition, the attorney’s letter cites various verses of scripture to support the assertion that the types of social services offered by the Church are typically considered church functions where they occur as part of a church use.

The letter also states that typical elements of a church include providing “advice”, “referrals”, and “fellowship” to those in need, as well as providing a sanctuary for prayer and providing advice to the community.

No support is found in the attorney's letter to show that all of the uses provided by the Church's programs, such as showers, legal clinics, and health care are "typical" elements of a church.

The BMC does not define "church" or provide any details about what activities are typical and/or allowed for this use.

One dictionary definition of "church" is "a building for public and especially Christian worship." See, Merriam-Webster Dictionary, <https://www.merriam-webster.com/dictionary/church> (last visited June 14, 2023).

Another definition is similar: "a building used for public Christian worship." See, Oxford English Dictionary, accessed via Google search on June 14, 2023.

Both of these definitions only refer to "worship," not any other religious activities.

The City is not aware of any information suggesting that when people are seeking and obtaining social services at St. Timothy's there is any worship/religious service being performed. The only worship or religious service at St. Timothy's occurs on Wednesdays from 12:00 to 12:45 PM and Sundays from 10:00 to 11:30 AM (see Attachment D).

The Church has not provided adequate evidence to show that these activities are "typical" functions conducted by churches and are considered part of a church use.

Are the Day Program, Advocacy Program, and Legal Clinic part of the Church's non-conforming use?

As mentioned above, the Church existed and was operating prior to 1989, when the Brookings Land Development Ordinance was adopted. Therefore, the Church was considered to be a legal non-conforming use at that time.

BMC 17.120.010 (Continuation of a nonconforming use) provides that a lawfully preexisting use of a structure or site, which does not conform to the regulations for the district in which it is located, shall be deemed to be a lawful, nonconforming use and may be continued, subject to regulations regarding maintaining, moving, altering, or enlarging the nonconforming structure. The BMC does not contain any provisions regarding altering or increasing the activities occurring on or within the property or the nonconforming structure.

An argument can be made that the Church considered itself to have a conditional use permit in 1999, since it applied for (and was granted) a "minor change" to its building pursuant to the BMC provisions applying to conditional uses.

Whether the Church is considered to be a legal nonconforming use or a permitted conditional use is not dispositive, since the legal analysis is very similar for both.

As mentioned above, the BMC is silent regarding altering or increasing the activities occurring on or within the property or the nonconforming structure. Other cities' codes vary, but the majority appear to allow, or at least not expressly prohibit, expansion of nonconforming uses, most commonly through a conditional-use procedure. A few do not allow any alteration that includes an expansion of the nonconforming use.

The general rule is that a reasonable increase in the intensity of a use, without physical change, is permitted. See 4 Arden H. Rathkopf & Daren A. Rathkopf, *The Law of Zoning and Planning* §51A.04[2], at

51A-49 (1991); 6 Patrick J. Rohan, *Zoning and Land Use Controls* §41.03[3][b], at 41-87 to 41-91 (1991).

Another way that some jurisdictions analyze requests for intensification of a nonconforming use or a conditional use is whether such intensification would have “no greater adverse impact” to the neighborhood than the existing use. See ORS 215.130 (regarding nonconforming uses on property within county jurisdiction).

In determining whether a nonconforming use has been established, and the extent of the nonconforming use, a factual determination is needed regarding what uses were in place at the Church in 1989 (when the Land Development Ordinance was adopted). The Church has the burden of proving both that the use existed in 1989, and what the level of use was at that time. See *Lane County v. Bessett*, 46 Or App 319, (1980); *Tylka v. Clackamas County*, 28 Or LUBA 417 (1994); *Fraley v. Deschutes County*, 32 Or LUBA 27, af’d, 145 Or App 484 (1996); *Smith v. Lane County*, 21 Or LUBA 228 (1991).

In the April 24, 2023, appeal letter, the Church asserts that it has continuously conducted “social services” since its establishment (prior to adoption of the Brookings Land Development Ordinance in 1989), but provides no evidence to support that assertion.

In his April 12, 2023 deposition, Fr. Lindley stated that the “advocacy program” began in “approximately” 2018. That provides evidence that at least the “advocacy program” began fairly recently, many years *after* the church was established. This shows that the nonconforming use and/or unpermitted conditional use was altered and/or expanded, and the Church should have requested a conditional use permit for adding these uses.

It does not appear that the Church has met its burden of proving both that its provision of “social services” existed in 1989 and/or what the level or intensity of those services was at that time. Therefore, the Church is required to abate these “social service” activities and apply for a conditional use permit to conduct such activities at the Church location.

RECOMMENDATION

Staff recommends DENIAL of APP-1-23, based on the staff report and the evidence contained in the attachments to the staff report.

Staff will prepare a FINAL ORDER to be considered at the next meeting.

ATTACHMENTS

Attachment A - Vicinity Map

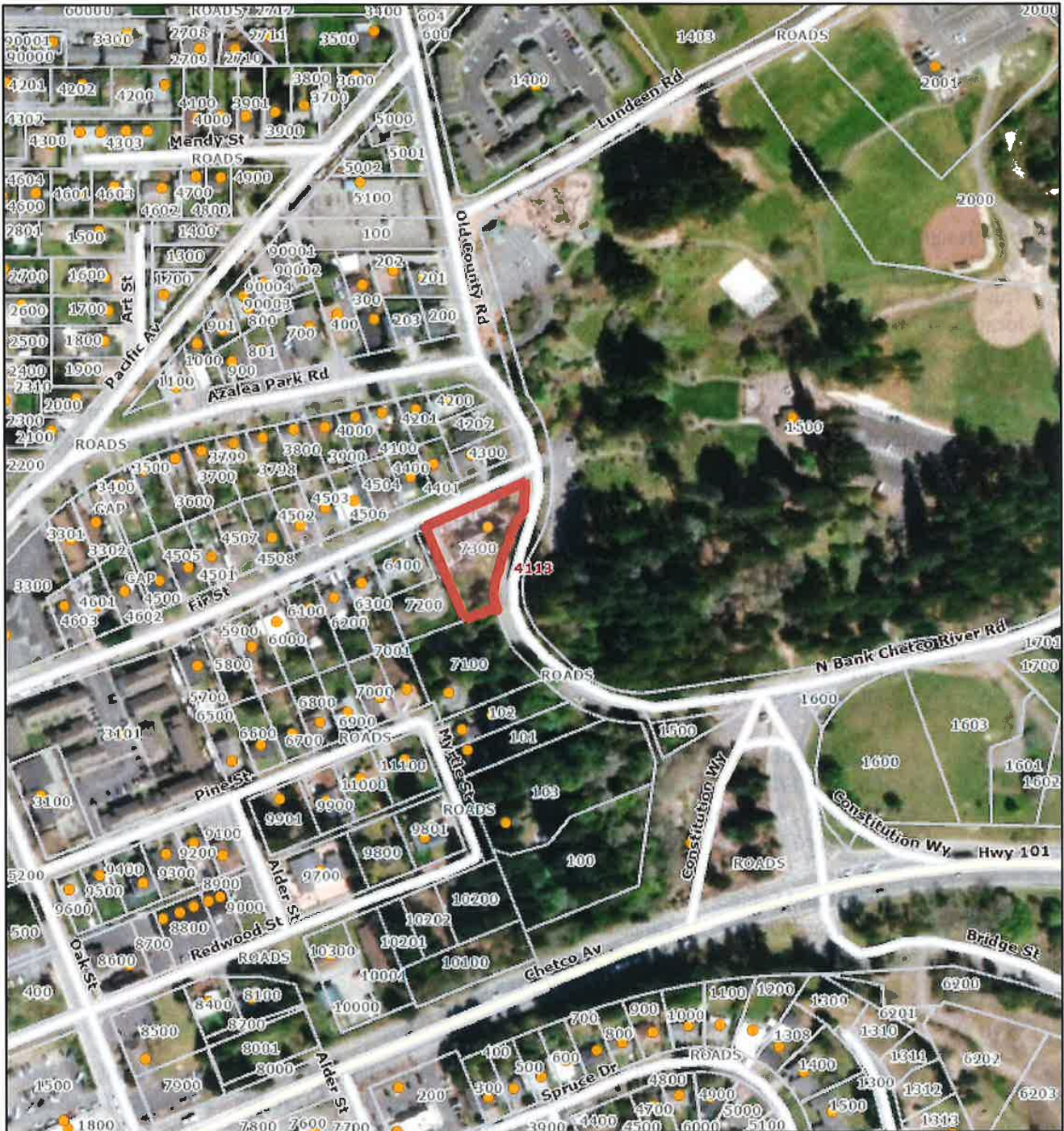
Attachment B - Property Photo

Attachment C - Minor Change to CUP documents (1999)

Attachment D - Fr. Lindley deposition excerpts (April 12, 2023)

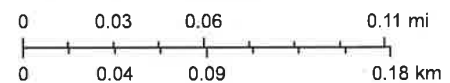
Attachment E - Notice to Abate (April 14, 2023)

Attachment F – St. Timothy’s Church Appeal letter (April 24, 2023)



6/1/2023, 11:18:21 AM

1:4,514



Bureau of Land Management, State of Oregon, State of Oregon DOT, State of Oregon GEO, Esri Canada, Esri, HERE, Garmin, USGS, EPA, USDA, Maxar

Created by LCOG for Curry County

The information on this map was derived from digital databases from the Curry County regional geographic information system by LCOG. Care was taken in the creation of this map, but is provided



Request for Minor Change to Conditional Use Permit
St. Timothy's Episcopal Church

Proposed improvements: To accommodate our growing congregation, we are planning to extend our nave 16 feet toward Azalea Park. Because our original church building was in existence before city zoning ordinances, we will only need a minor change to our current conditional use permit.

A. Compliance with comprehensive plan: We feel that St. Timothy's is an asset to our neighborhood and that adding onto our church conforms with the comprehensive plan.

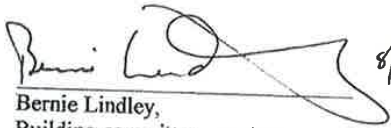
B. Adequate space: Our building is on a double lot. There is adequate room for the addition to the nave and for the extra parking. We did have a problem with the side-yard setback closest to Old County Road, but we have obtained a variance from the planning commission.

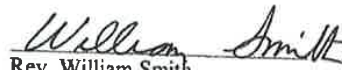
C. Traffic: The increase in traffic will be about seven cars and will typically occur on Sunday morning when the streets are not very busy. Our addition will have a negligible impact on traffic congestion.

D. Adverse impact on adjoining properties: Because we are on a corner lot, and closest property to the new addition is Azalea Park, we will have no detrimental impact on our neighbors.

E. Preservation of scenic attributes: We are proud of the architecture of our church. Our new addition will simply extend the original lines 16 feet. It is likely that the casual observer won't notice the change to the building.

This request is submitted by Bernie Lindley with the approval of the building committee at St. Timothy's and the approval of the Rev. William Smith, Vicar.

 8/4/99
Bernie Lindley,
Building committee member


Rev. William Smith
Vicar, St. Timothy's

MC - 1 - 99 (minor change) to a "De Facto" Conditional use Permit.
"Findings of Fact" above

CITY OF BROOKINGS

898 Elk Drive
Brookings, Oregon 97415
Phone (541) 469-2163
Fax (541) 469-3650
cityhall@brookingsor.org

The Home of Winter Flowers



September 8, 1999

St. Timothy's Episcopal Church
PO Box 1237
Brookings OR 97415

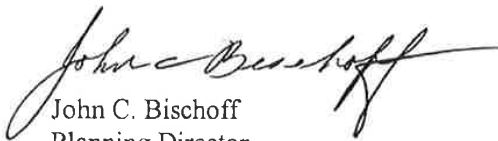
RE: Your application for a minor change to a de facto conditional use permit to allow a 16 foot extension of the chapel areas of the church building (File No. MC-1-99).

This is to inform you of the action taken at the meeting of the Brookings Planning Commission on the above referenced matter.

At the Planning Commission meeting of September 7, 1999, the Commission adopted the Final ORDER and Findings of Fact document (enclosed) in the approval of the application. Approval of this conditional use permit will expire one year from the date of approval unless your project comes under substantial construction within that period.

Please be advised that decisions of the Planning Commission may be appealed to the City Council within fifteen (15) days after the decision of the Commission, pursuant to the Land Development Code, Section 156. If there are any questions please feel free to contact the Planning Offices.

Sincerely,



John C. Bischoff
Planning Director

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BEFORE THE PLANNING COMMISSION
CITY OF BROOKINGS, COUNTY OF CURRY
STATE OF OREGON

In the matter of Planning Commission File No.) **Final ORDER**
MC-1-99; a request for a minor change to a) **and Findings of**
conditional use permit; St. Timothy's Church,) **Fact**
applicant)

ORDER approving of an application for a minor change to what is considered to be a "de facto" Conditional Use Permit to expand the existing church building by extending the chapel area 16 feet to the east; Assessor's Map 41-13-5BC, Tax Lot 7300; R-1-6 (Single Family Residential, 6,000 sq. ft. minimum lot size).

WHEREAS:

1. The Planning Commission duly accepted the application filed in accordance with the Brookings Land Development Code pursuant to Section 140 Conditional Use Permits; and
2. Such application is required to show evidence that all of the following criteria has been met:
 - A. The proposal is in compliance with the Comprehensive Plan.
 - B. The site for the proposed use is adequate in size and shape to accommodate said use and all yards, spaces, walls and fences, parking, loading, landscaping and other features required by this code.
 - C. The site for the proposed use relates to streets and highways adequate in width and degree of improvement to handle the quantity and kind of vehicular traffic that would be generated by the proposed use.
 - D. The proposed use will have minimal adverse impact upon adjoining properties and the improvements thereon. In making this determination, the commission shall consider, but not be limited to, the proposed location of the improvements on the site, vehicular egress/ingress and internal circulation, pedestrian access, setbacks, height and bulk of buildings, walls and fences, landscaping, screening, exterior lighting and signing.
 - E. In areas designated as requiring preservation of historic, scenic or cultural attributes, proposed structures will be of a design complimentary to the surrounding area.
3. The Brookings Planning Commission duly set this matter upon the agenda of a public meeting and considered the above described application with the public hearing a matter of record of the Planning Commission meeting of September 7, 1999; and
4. At the public meeting on said conditional use permit application, evidence and testimony was presented by the applicant and recommendations were received from and presented by the Planning Director in the form of a Staff Agenda Report, dated August 26, 1999 and oral presentation of same; and

5. At the conclusion of the presentation of the applicant, Planning Director and the public, after consideration and discussion the Brookings Planning Commission, upon a motion duly seconded, approved the request for the subject conditional use permit and directed staff to prepare a Final ORDER with the findings set forth therein for the approval of said application.

THEREFORE, LET IT BE HEREBY ORDERED that the application of the conditional use permit on the subject parcel is approved. This approval is supported by the following findings and conclusions:

FINDINGS

1. The applicant is requesting a minor change to what is considered to be a "de facto" conditional use permit to expand the existing chapel area by approximately 392 sq. ft. and to add a total of 8 new parking spaces on a 0.67 acre lot.
2. The subject property is zoned R-1-6 (Single Family Residential, 6,000 sq. ft. minimum lot size) and is designated as residential by the Comprehensive Plan.
3. Churches are allowed in the residential zones as a conditional use with a side and rear yard setback of 30 feet..
4. The exiting church building has been on the subject property since before the city had zoning regulations and is thus considered to have a "de facto" conditional use permit.
5. The proposed expansion will consist of extending the chapel area 16 feet to the east.
6. At its closest point the exiting building is 22 feet from the easterly property line. The proposed expansion will place the building 12 feet from the property line.
7. The applicant has requested and received a variance for the new side yard setback (File No. VAR-2-99).
8. Section 92, Off- Street Parking And Loading Regulations, of the Land Development Code, requires churches to provide one parking space for each 4 seats in the main gathering area. The church currently has 17 parking spaces.
9. The proposed building expansion will provide for a total of 80 seats which, under Section 92, would require 20 parking spaces.
10. Fir St. is a paved travel way within a right-of-way of 55 feet with no other improvements adjacent to the subject property.
11. Old County Rd. is a paved travel way with in a 60 foot right-of-way with no other improvements adjacent to the subject property.
12. Development surrounding the subject property consists of single family residential on the north, west and south. The area to the east is the Azalea City Park.

CONCLUSIONS

1. The total building footprint after the expansion will not occupy more than 12% of the total lot area. Although the original parking backs directly on to the existing street, this parking arrangement predates any city ordinance governing parking and is considered to be grand fathered. The application for a minor change to the "de facto" use permit does allow the Planning Commission to require the parking to be relocated to comply with Section 92. However, although the lot is large enough to provide for the parking, the topography does not. Requiring the existing parking to meet code would effectively negate the earlier approval of the variance and make the proposed building expansion moot. Since there have been no complaints or accidents resulting from the existing arrangement, there is no reason to move the parking. The new parking area of 9 spaces meets the requirements of Section 92.

The existing building meets the setback requirements of the R-1-6 Zone except on the east side which does not meet the 30 foot set back requirement. The proposed expansion will decrease this setback even further, however, since this is the side adjacent to Azalea Park, a variance has been issued to allow a lesser setback. With the variance which was approved earlier, the subject site is adequate in size to accommodate the proposed building expansion and additional parking.

2. The proposed expansion to the chapel area of the existing church building will add capacity for approximately 20 seats. Using the seating to parking space ration of Section 92, this would equate to 5 more cars on the street before and after services. This increase is insignificant and does not impact the ability of Fir St. to handle traffic. The conditions of approval will require the relocation of the church's sign which obscures the view of cars on Fir St. trying to enter Old County Rd.
3. The proposed expansion will have little or no impact on the surrounding neighborhood. The expanded end of the building, because of existing landscaping will hardly be noticeable to the surrounding neighbors. As stated above the amount of traffic generated by the proposed expansion will not create a negative impact on the neighborhood.
4. The existing church building could be considered to be a historical attribute since it has been on the site for so long. The addition to the building will be of the same design and follow the same architectural line as the existing building. Azalea Park, located to the east, is a scenic attribute, however, the proposed addition will not detract from the parks scenic qualities.
5. With the approved variance the proposed expansion of the existing church building meets the requirements of the criteria addressed above and is consistent with the other applicable provisions of the Land Development Code. Although the Comprehensive Plan does not specifically address churches, allowing the proposed expansion will utilize the existing land more efficiently and will not require the church to relocate to accommodate a growing congregation.

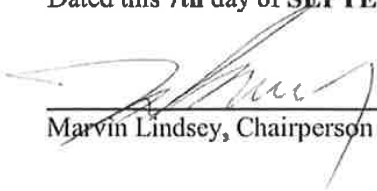
CONDITIONS OF APPROVAL

The conditions of approval are attached to this document and are made apart thereof.

LET IT FURTHER BE OF RECORD that the Planning Commission approved the requested


Conditional Use Permit.

Dated this 7th day of SEPTEMBER, 1999.



Marvin Lindsey, Chairperson

ATTEST:



John C. Bischoff, Planning Director

CONDITIONS OF APPROVAL
CONDITIONAL USE PERMIT
MC-1-99
September 7, 1999

General Conditions

1. Approval of this conditional use permit will expire one year from approval, unless the project comes under substantial construction within that period. The Planning Commission may extend the permit for an additional one year period at the request of the applicant.
2. The conditions stated herein are mandatory and must be completed. Failure to comply with any condition will result in the review and possible revocation of your permit pursuant to Section 140.110, Violation of Conditions, of the Land Development Code. The loss of your permit will result in the closure of your business.
3. The final construction plans shall be in substantial conformance with the submitted preliminary site plan as amended herein and as approved by the Planning Commission. Substantial changes to the approved preliminary plat require re-approval by the Planning commission.
4. Improvement work shall not be commenced until construction plans including grading have been approved by the City Engineer.
5. All costs of plans checks and inspections by the City Engineer shall be paid by the applicant to the city.
6. Information on the construction plans shall be pursuant to the City of Brookings Standard Specifications document dated August, 1988.
7. Prior to the issuance of an occupancy permit, all street, infrastructure and storm drain construction must be completed.
8. Prior to the issuance of an occupancy permit the new parking area shall be buffered with a sight obscuring fence or by landscaping along the westerly property line, so as to screen the parking from the adjoining residential uses.
9. All outdoor lighting shall be directed and/or shielded so as to prevent light from falling directly on adjoining properties.
10. All buildings shall meet the yard setback and separation requirements pursuant to of the Land Development Code except as allowed by the approved variance (File No. VAR-2-99).
11. All outdoor trash containers shall be screened from view with a decorative fence and gate at least 6 feet high.
12. The existing church sign shall be moved to a location that does not block the view of cars at the stop sign on Fir St. trying to enter Old County Rd.

CITY OF BROOKINGS PLANNING COMMISSION
STAFF AGENDA REPORT

SUBJECT: Conditional Use Permit
FILE NO: MC-1-99
HEARING DATE: September 7, 1999

REPORT DATE: August 24, 1999
ITEM NO: 8.2

GENERAL INFORMATION

APPLICANT: St. Timothy's Church.

REPRESENTATIVE: Bernie Lindley.

REQUEST: A minor change to a de facto conditional use permit to allow a 16 foot extension of the chapel area of the church building.

TOTAL LAND AREA: 0.67 acres.

LOCATION: In the southwest corner of Fir St. and Old County Rd. 401 Fir St.

ASSESSOR'S NUMBER: 41-13-5CB, Tax Lot 7300.

ZONING / COMPREHENSIVE PLAN INFORMATION

EXISTING: R-1-6 (Single Family Residential, 6,000 sq. ft. minimum lot size).

PROPOSED: Same.

SURROUNDING: North, West and South-R-1-6; East-P/OS (Public Open Space).

COMP. PLAN: Residential.

LAND USE INFORMATION

EXISTING: Church building.

PROPOSED: Expansion of existing church building

SURROUNDING: North, West and South-Residential uses; East-Azalea Park.

PUBLIC NOTICE: Mailed to all property owners within 250 feet of subject property and published in local news paper.

BACKGROUND INFORMATION

The subject property is an irregular shaped, 0.67 acre parcel of land located in the southwest corner of Old County Rd. and Fir St. The property fronts on Old County Rd. on the east and Fir St. on the north, however, the Fir St. frontage provides the only usable access to the property. The subject property has 229.58 feet of frontage on Fir St., 273.06 feet of frontage on Old County Rd., a southerly boundary of 68.45 feet, and a westerly boundary of 198.18 feet. The property is currently the site of the St. Timothy's Episcopal Church. The parking area for the church is along the Fir St. frontage and contains 17 parking spaces.

The topography of the subject property varies, starting along the north side of Fir St. frontage is flat and then begins to drop to the south. There is a gully along the west side of Old County Rd. starting at the intersection of Fir St. and increasing rapidly in depth as the land drops toward the south. This gully essentially prevents access to the subject property from Old County Rd.

The subject property is zoned R-1-6 (Single Family Residential, 6,000 sq. ft. minimum lot size) as is the area to the north, west and south which is developed accordingly. The area to the east is zoned P/OS (Public Open Space) and is the site of Azalea City Park which is directly across Old County Rd. from the subject property.

Old County Rd. is a paved travel way within a 60 foot right-of-way with no other improvements. Fir St. is a paved travel way within a 55 foot right-of-way with no other improvements. The church currently has city water and sewer service.

PROPOSED CONDITIONAL USE PERMIT

Churches are allowed in the R-1-6 with an approved conditional use permit. Since the church building has been located on the subject property since the 1950s, which was before the city established a zoning code, it is considered to have a "de facto" conditional use permit. The existing building is configured with the chapel extending to the east from the main entrance. The applicant is requesting a minor change to the permit to expand the seating area of the chapel to accommodate the growth of the church congregation. This will be accomplished by extending the 24.5 foot wide chapel a total of 16 feet to the east for an addition of 392 sq. ft. (See Exhibit 2). The building footprint is currently 3,047.75 sq. ft. or approximately 10% of the total lot area. The addition will make the footprint 3,439.75 sq. ft. or 12% of the site.

The applicant states that the proposed expansion would allow a total of 80 seats in the chapel which is the largest gathering area. Section 92, Off-Street Parking And Loading Regulations, of the Land Development Code, requires that the church provide 1 parking space for each 4 seats, thus, in this case, 20 spaces. The church currently has 17 parking spaces and as a part of this application is proposing the addition of 9 parking spaces in the westerly portion of the church property and one space along the street at the east end of the existing parking. To accommodate the 9 spaces along the easterly property line, two of the existing spaces will be eliminated, leaving a total of 25 parking spaces.

The easterly property line of the subject property (also the westerly right-of-way line of Old County Rd.) is at an angle to the east end of the church building. The southeast corner of the building is currently 22 feet from the property line at its closest point. The proposed expansion will place this building corner 12 feet from the property line at its closest point. Since the Land Development Code requires that churches within the residential zones have a side and rear yard setback of at least 30

feet, the applicant has requested and gained approval of a variance to allow the reduced setback (See file No. VAR-2-99).

ANALYSIS

In order to grant any conditional use, the planning commission must find that the application meets the requirements of the following criteria, which is listed in Section 140 Conditional Use Permits, of the LDC.

1. The proposal is in compliance with the Comprehensive Plan.
2. The site for the proposed use is adequate in size and shape to accommodate said use and all yards, spaces, walls and fences, parking, loading, landscaping and other features required by this code.
3. The site for the proposed use relates to streets and highways adequate in width and degree of improvement to handle the quantity and kind of vehicular traffic that would be generated by the proposed use.
4. The proposed use will have minimal adverse impact upon adjoining properties and the improvements thereon. In making this determination, the commission shall consider, but not be limited to, the proposed location of the improvements on the site, vehicular egress/ingress and internal circulation, pedestrian access, setbacks, height and bulk of buildings, walls and fences, landscaping, screening, exterior lighting and signing.
5. In areas designated as requiring preservation of historic, scenic or cultural attributes, proposed structures will be of a design complimentary to the surrounding area.

Since the first criterion includes the requirements of all of the others it will be discussed after the last four.

Criterion 2, Adequate Size And Shape. The subject lot is large enough to accommodate the proposed building expansion and additional parking. The proposed building expansion will place the building 12 feet from the easterly property line which does not meet the setback requirement of 30 feet as required by the Land Development Code, however, the church has received an approved variance for the new setback. The new parking consists of nine 9 X 20 spaces, perpendicular to the west property line with a 24 foot wide paved maneuvering area as required by Section 92. There is also a 4 foot wide strip of land between the parking spaces and the west property line. The conditions of approval will require landscaping or fencing to provide the required buffer between the church use and adjoining residential uses. There is also a four foot wide strip for landscaping along the street in this area. The expanded building will only occupy about 12% of the total site.

Criterion 3, Relation of Streets. Access to the property is from Fir St. which has a right-of-way width of 55 feet in the area adjacent to the subject property. The church building has existed on this site for many years and staff is not aware of any complaints resulting from church traffic. The proposed expansion will provide 20 additional seats which, by the parking ratio would add 5 additional cars to the traffic flow for church services. Even if the traffic increased by 10 cars, the street width is sufficient to accommodate this increase.

The existing parking, currently 17 spaces but to be reduced to 16, backs directly out into the street which is not allowed by current parking regulations. However, since this parking has been in place since before the city had a parking code, it is considered to be a "grandfathered" use. While the request for a change in the conditional use gives the Planning Commission the authority to cause the parking to be changed to meet the code, there is no usable space on the subject property to place this parking. Requiring the existing parking to meet code would effectively negate the earlier approval of the variance and make the proposed building expansion moot. Since there have been no complaints, there appears to be no reason to change the existing parking. The additional parking will meet the requirements of Section 92.

As a condition of approval, the church will be required to move the exiting sign to another location. In its current location the sign tends to block the view of cars stopped at the stop sign on Fir St., from seen cars coming from the right on Old County Rd.

Criterion 4, Neighborhood Impact. The proposed expansion will have little or no impact on the adjoining property. The location of the expansion, the landscaping and the topography of the site will make the building extension almost invisible to the neighbors. The additional parking will be buffered by either landscaping or fencing from the adjoining neighbor on the west.

Criterion 5, Historic, Scenic Or Cultural Attributes. The church itself could be considered to be a historic attribute to the area since it has been there for so long. The applicants findings state that the proposed expansion will follow the original lines of the building. Azalea Park, which is located across Old County Rd. from the subject property is a scenic attribute, however, the proposed expansion of the church building will not impact these qualities for the same reasons stated in Criterion 4, above.

Criterion 1, Compliance With Comprehensive Plan. With the approved variance the proposed expansion of the existing church building meets the requirements of the criteria addressed above and is consistent with the other applicable provisions of the Land Development Code. Although the Comprehensive Plan does not specifically address churches, allowing the proposed expansion will utilize the existing land more efficiently and will not require the church to relocate to accommodate a growing congregation.

FINDINGS

1. The applicant is requesting a minor change to what is considered to be a "de facto" conditional use permit to expand the existing chapel area by approximately 392 sq. ft. and to add a total of 8 new parking spaces on a 0.67 acre lot.
2. The subject property is zoned R-1-6 (Single Family Residential, 6,000 sq. ft. minimum lot size) and is designated as residential by the Comprehensive Plan.
3. Churches are allowed in the residential zones as a conditional use with a side and rear yard setback of 30 feet..
4. The exiting church building has been on the subject property since before the city had zoning regulations and is thus considered to have a "de facto" conditional use permit.
5. The proposed expansion will consist of extending the chapel area 16 feet to the east.

6. At its closest point the exiting building is 22 feet from the easterly property line. The proposed expansion will place the building 12 feet from the property line.
7. The applicant has requested and received a variance for the new side yard setback (File No. VAR-2-99).
8. Section 92, Off- Street Parking And Loading Regulations, of the Land Development Code, requires churches to provide one parking space for each 4 seats in the main gathering area. The church currently has 17 parking spaces.
9. The proposed building expansion will provide for a total of 80 seats which, under Section 92, would require 20 parking spaces.
10. Fir St. is a paved travel way within a right-of-way of 55 feet with no other improvements adjacent to the subject property.
11. Old County Rd. is a paved travel way with in a 60 foot right-of-way with no other improvements adjacent to the subject property.
12. Development surrounding the subject property consists of single family residential on the north, west and south. The area to the east is the Azalea City Park.

CONCLUSIONS

1. The total building footprint after the expansion will not occupy more than 12% of the total lot area. Although the original parking backs directly on to the existing street, this parking arrangement predates any city ordinance governing parking and is considered to be grand fathered. The application for a minor change to the "de facto" use permit does allow the Planning Commission to require the parking to be relocated to comply with Section 92. However, although the lot is large enough to provide for the parking, the topography does not. Requiring the existing parking to meet code would effectively negate the earlier approval of the variance and make the proposed building expansion moot. Since there have been no complaints or accidents resulting from the existing arrangement, there is no reason to move the parking. The new parking area of 9 spaces meets the requirements of Section 92.

The existing building meets the setback requirements of the R-1-6 Zone except on the east side which does not meet the 30 foot set back requirement. The proposed expansion will decrease this setback even further, however, since this is the side adjacent to Azalea Park, a variance has been issued to allow a lesser setback. With the variance which was approved earlier, the subject site is adequate in size to accommodate the proposed building expansion and additional parking.

2. The proposed expansion to the chapel area of the existing church building will add capacity for approximately 20 seats. Using the seating to parking space ration of Section 92, this would equate to 5 more cars on the street before and after services. This increase is insignificant and does not impact the ability of Fir St. to handle traffic. The conditions of approval will require the relocation of the church's sign which obscures the view of cars on Fir St. trying to enter Old County Rd.

3. The proposed expansion will have little or no impact on the surrounding neighborhood. The expanded end of the building, because of existing landscaping will hardly be noticeable to the surrounding neighbors. As stated above the amount of traffic generated by the proposed expansion will not create a negative impact on the neighborhood.
4. The existing church building could be considered to be a historical attribute since it has been on the site for so long. The addition to the building will be of the same design and follow the same architectural line as the existing building. Azalea Park, located to the east, is a scenic attribute, however, the proposed addition will not detract from the parks scenic qualities.
5. With the approved variance the proposed expansion of the existing church building meets the requirements of the criteria addressed above and is consistent with the other applicable provisions of the Land Development Code. Although the Comprehensive Plan does not specifically address churches, allowing the proposed expansion will utilize the existing land more efficiently and will not require the church to relocate to accommodate a growing congregation.

CONDITIONS OF APPROVAL

The proposed conditions of approval are attached to and made a part of this report.

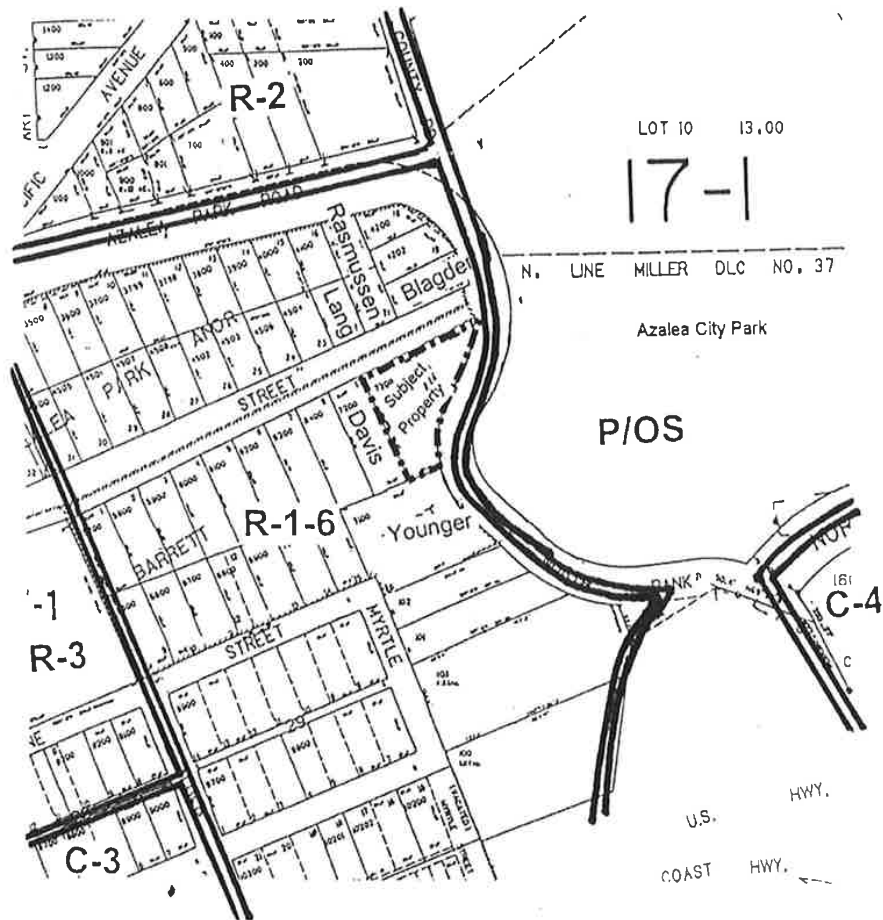
RECOMMENDATION

Staff recommends **Approval** of Case File No. MC-1-99, based on the findings and conclusions stated in the staff report and subject to the conditions of approval listed above.

Staff has prepared a Final ORDER to be considered at this meeting.

CASE NO. MC-1-99

EXHIBIT NO. 1



APPLICANT: St. timothy's Episcopal Church

ASSESSOR'S NO: 41-13-5BC Tax Lot 7300

LOCATION: south side of Fir Street at its intersection with Old County Road

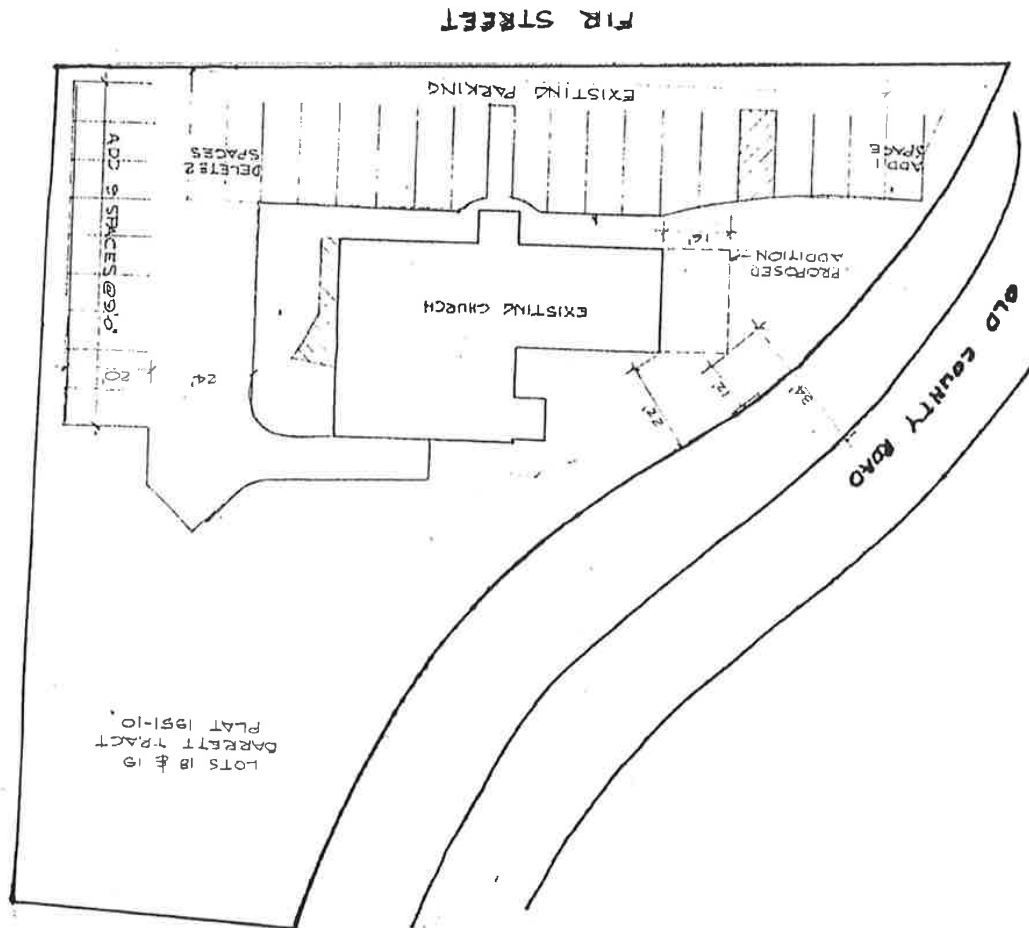
SIZE: 0.67 acre

ZONE: R-1-6 (Single-family Residential, 6,000 sq. ft. minimum lot size)



CASE NO. MC-1-99

EXHIBIT NO. 2



APPLICANT: St. timothy's Episcopal Church

ASSESSOR'S NO: 41-13-5BC Tax Lot 7300

LOCATION: south side of Fir Street at its intersection with Old County Road

SIZE: 0.67 acre

ZONE: R-1-6 (Single-family Residential, 6,000 sq. ft. minimum lot size)



Request for Minor Change to Conditional Use Permit
St. Timothy's Episcopal Church

Proposed improvements: To accommodate our growing congregation, we are planning to extend our nave 16 feet toward Azalea Park. Because our original church building was in existence before city zoning ordinances, we will only need a minor change to our current conditional use permit.

A. Compliance with comprehensive plan: We feel that St. Timothy's is an asset to our neighborhood and that adding onto our church conforms with the comprehensive plan.

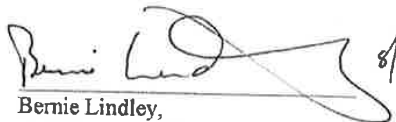
B. Adequate space: Our building is on a double lot. There is adequate room for the addition to the nave and for the extra parking. We did have a problem with the side-yard setback closest to Old County Road, but we have obtained a variance from the planning commission.

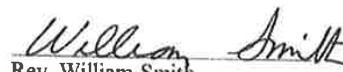
C. Traffic: The increase in traffic will be about seven cars and will typically occur on Sunday morning when the streets are not very busy. Our addition will have a negligible impact on traffic congestion.

D. Adverse impact on adjoining properties: Because we are on a corner lot, and closest property to the new addition is Azalea Park, we will have no detrimental impact on our neighbors.

E. Preservation of scenic attributes: We are proud of the architecture of our church. Our new addition will simply extend the original lines 16 feet. It is likely that the casual observer won't notice the change to the building.

This request is submitted by Bernie Lindley with the approval of the building committee at St. Timothy's and the approval of the Rev. William Smith, Vicar.

 8/4/99
Bernie Lindley,
Building committee member


Rev. William Smith
Vicar, St. Timothy's



Land-Use Permit Application City of Brookings

898 Elk Drive Brookings OR 97415
(541) 469-2163 Ext. 237 Fax (541) 469-3650

Applicants must complete the following form to the best of their knowledge. Incomplete information may cause a delay in the review and the final decision on your request. If requested information is not known to the applicant, city staff will provide such information where appropriate.

APPLICATION FOR:

- | | | |
|--|---|--|
| <input type="checkbox"/> Minor Partition | <input type="checkbox"/> Planned Unit Development | <input type="checkbox"/> Lot Line Adjustment |
| <input type="checkbox"/> Major Partition | <input type="checkbox"/> Subdivision | <input type="checkbox"/> Annexation |
| <input type="checkbox"/> Plan Amendment | <input type="checkbox"/> Variance | <input checked="" type="checkbox"/> Minor Change |
| <input checked="" type="checkbox"/> Conditional Use Permit | <input type="checkbox"/> Vacation | <input type="checkbox"/> Sign Permit |
| <input type="checkbox"/> Appeal: Planning Com. | <input type="checkbox"/> Appeal: City Council | |

APPLICANT/OWNER INFORMATION:

Applicant St. Timothy's Episcopal Church
Mailing Address P.O. Box 1237
City Brookings State OR Zip 97415
Telephone No. 469-3314 Fax No. _____
Representative Bernie Lindley
Mailing Address 16225 Chapman Ln
City Brookings State OR Zip 97415
Telephone No. 469-0972 Fax No. _____
Owner (If not applicant) _____
Mailing Address _____
City _____ State _____ Zip _____
Telephone No. _____ Fax No. _____

PROPERTY INFORMATION:

Location 401 Fir Street (SW corner of Old county Rd & Fir St.)
Assessor's Map No. 41-13-53C Tax Lot No. 7300
Parcel Size .67 acre Existing Zoning R-1-b
Comprehensive Plan Designation residential
Existing Use Church
Proposed Use expansion of church building
Is water service available to the site? Yes
If no, how far to nearest city water line? _____
Is sewer service available to the site? yes
If no, how far to nearest city line? _____

REQUEST:

We need a minor change to our conditional use permit so that we can expand our existing church because it is located on a lot that is zoned R-1-b.

I hereby certify that the information provided on this application is correct to the best of my knowledge and understand that any false information may result in the rejection of the application and forfeiture of all fees submitted.

Applicant's Signature Bernie Lindley Date 8/4/99

If applicant is not the owner of the property subject to this request please have the owner sign below or attach a letter signed by the owner authorizing to act on his/her behalf. The signature of only one owner is required, however a list of all owner's names and addresses must be submitted with application.

Property Owner's Signature William A. Smith Date 8/4/99

File No. MC-1-99 Date Received 8/4/99 Receipt No. 11695 Received by POB

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
MEDFORD DIVISION

ST. TIMOTHY'S EPISCOPAL)	
CHURCH, by and through)	
THE DIOCESE OF OREGON,)	
dba THE EPISCOPAL DIOCESE)	
OF OREGON, an Oregon)	
nonprofit corporation,)	
and REVEREND JAMES)	
BERNARD LINDLEY, vicar of)	
St. Timothy's Episcopal)	
Church,)	
)	
Plaintiffs,)	
)	
v.)	Case Number 1:22-cv-00156-CL
)	
CITY OF BROOKINGS, an)	
Oregon municipal)	
government,)	
)	
Defendant.)	

VIDEOTAPED DEPOSITION OF REVEREND JAMES BERNARD LINDLEY

testifying in his personal capacity

and as 30(b)(6) witness

Taken in behalf of the Defendant

April 12, 2023

TAKEN VIA VIDEOCONFERENCE

3

EXAMINATION INDEX

Page

Examination by Heather Van Meter

6

Examination by Samantha Sondag

176

* * *

EXHIBIT INDEX

Number Description

Page

NONE MARKED

Requested information:

Documents reviewed in preparation of deposition

11

Instruction by counsel: 90, 139

* * *

1 Q. Okay. Does the -- has -- does it continue its
2 activities now?

3 **A. Yes.**

4 Q. Okay. And the -- who are the people on the advocacy
5 team?

6 **A. Sister Cora Rose and Machell Carroll. Those are the**
7 **paid members and then there's a volunteer, her name**
8 **is Veronica, Veronica Spalding. And then another**
9 **unpaid member would be Pastor Jim Abbott, and then**
10 **also Deacon Linda works sometimes on the advocacy**
11 **team, Deacon Linda Lee as an unpaid member of the**
12 **team.**

13 Q. And are those the same people who have been on the
14 advocacy team since it started?

15 **A. No.**

16 Q. When did the advocacy team start?

17 **A. I wish I could remember the exact year and date, you**
18 **know, the month and date -- month and year, but it**
19 **was approximately 2018.**

20 Q. And since it began in approximately 2018, have there
21 always been some paid members of the advocacy team?

22 **A. Yes.**

23 Q. And has that been Cora Rose and Machell Carroll the
24 whole time?

25 **A. It has not.**

1 for a conditional-use permit from the City?

2 **A. We had already been feeding since 2009. That**
3 **ordinance -- when that ordinance went into effect,**
4 **we'd already been feeding for how-many-ever years**
5 **that was, 12 years. I -- I -- I felt that that --**
6 **that ordinance was an unnecessary -- I want to**
7 **choose a good word here -- violation of our right to**
8 **freely practice our faith without government**
9 **interference.**

10 **Q. What other activities do you carry out at**
11 **St. Timothy's? I understand there's a legal clinic**
12 **and a health clinic?**

13 **MS. SONDAG: Objection. Vague.**

14 **BY MS. VAN METER:**

15 **Q. Go ahead and answer.**

16 **A. I don't know who -- what do you mean by "legal**
17 **clinic"?**

18 **Q. Well, you referenced a legal clinic in your sermons,**
19 **so I'm asking what the legal clinic is that you have**
20 **at St. Timothy's.**

21 **A. Okay. Did I use the phrase "legal clinic," though?**

22 **Q. Yes.**

23 **A. Okay. That's surprising to me, because I don't**
24 **think -- we have a lawyer on staff that gives legal**
25 **advice, like a legal aid --**

1 Q. Uh-huh.

2 A. -- to our -- to our community members who would not
3 be able to obtain legal -- legal services otherwise.

4 Q. Okay. So tell me about that. Who is that? How
5 often do they work? Is it out of St. Timothy's?
6 All of the same questions as we had with the other
7 programs that you have.

8 A. Okay. So it's Sister Cora, she is a member of the
9 Oregon State Bar, and she works with people who need
10 legal help, and those -- those people get referred
11 to the church by various different means, and -- and
12 she works with them to the best of her ability.

13 Q. And is she paid for that activity? Is it volunteer?

14 A. No, she's paid.

15 Q. And how many hours -- how many hours a week does she
16 get paid for this legal-service activity?

17 A. 19 or 20 hours a week.

18 Q. Is this in addition to her work for the advocacy
19 team, or is this part of -- in your mind, is this
20 part of the advocacy team work?

21 A. That is -- her role on the advocacy team is to
22 provide legal aid.

23 Q. Okay. And the legal aid she provides is 19 to 20
24 hours a week?

25 A. That's what she's paid for, yes.

1 Q. Okay. And she does this work out of St. Timothy's
2 Church building?

3 **A. Yes.**

4 Q. And what kinds of legal services is she providing?
5 Is it just referrals to other lawyers, or is she
6 also actually providing legal representation?

7 **MS. SONDAG: Objection. Calls for a legal**
8 **conclusion.**

9 **BY MS. VAN METER:**

10 Q. Go ahead and answer.

11 **A. So I -- so she does things like expungements, she**
12 **does things like help people navigate the Social**
13 **Security Administration, she helps people with --**
14 **perhaps answers questions for, like, tenant-**
15 **landlord-type issues, and then she refers -- if it's**
16 **something that she can't -- if she doesn't know the**
17 **answer, she refers them to a different organization.**

18 Q. And she's licensed with the state bar?

19 **A. She is.**

20 Q. Do you know if her license is active or like an
21 inactive pro bono status?

22 **A. It is active.**

23 Q. Does she separately -- does she work anywhere other
24 than St. Timothy's?

25 **A. Not that I'm aware of.**

1 **A. Yes.**

2 Q. And how often is that?

3 **A. Once a month.**

4 Q. And when you say "primary care provider," is it a
5 doctor or a nurse practitioner?

6 **A. Nurse practitioner.**

7 Q. And that's one full day per month?

8 **A. I -- I wouldn't say full day, no.**

9 Q. Okay. What -- what day -- is there a set schedule
10 for it?

11 **A. I think -- I think it's about 8:30 to 2:00.**

12 Q. Okay. And is there a set day per month, like first
13 Monday or anything like that?

14 **A. No.**

15 Q. Okay. Is it just based on a nurse's availability?

16 **A. The nurse practitioner's availability, yes.**

17 Q. And what is the nurse's name?

18 **A. Her name is Karla.**

19 Q. And what's the last name?

20 **A. Reinholt [sic].**

21 Q. Can you spell that for our court reporter, if you
22 know?

23 **A. Well, Karla is with a K, I can tell you that, and**
24 **Reinhart.**

25 Q. Maybe R-E-I-N-H-A-R-T?

1 **A. I'm not sure.**

2 Q. Okay.

3 **A. I call her Karla.**

4 Q. Sure. Do you also operate a day program at
5 St. Timothy's?

6 **A. I think what you're referring to is our Monday,**
7 **Wednesday, Friday office hours in the mornings from**
8 **in 9:00 to 12:00. Is that what you're referring to?**

9 Q. I don't know. There's a reference in the complaint
10 that was filed that started the lawsuit here. It
11 says, "St. Timothy's has long operated a day program
12 on Mondays, Wednesdays, and Fridays during which it
13 offers community members use of shower facilities
14 and assistance with applications for social
15 services." So what is that day program?

16 **A. Yeah, so that's 9:00 to 12:00.**

17 Q. Three days a week?

18 **A. Yes.**

19 Q. And what do you do at this day program?

20 **A. We make the showers available, we provide coffee,**
21 **access to the Internet, oftentimes our community**
22 **members charge their phones, and -- and then -- and**
23 **that's when they interact with our advocacy team.**

24 Q. Are those the set times that your advocacy team is
25 there also, or are they there additional times?

1 **A. Those are set times, and occasionally they might be**
2 **here on additional times as well, but that's not --**
3 **that's not advertised or -- that would be on a --**
4 **what would you want to call that? That would be on**
5 **an individual basis --**

6 Q. Okay.

7 **A. -- occasion.**

8 Q. Okay. The Internet access, is that just part of the
9 day program where you give -- people who come into
10 the day program have access to the Internet if they
11 have devices for it?

12 **A. So let me -- let me -- people access the Internet**
13 **when they're here, yes.**

14 Q. Okay.

15 **A. If they have a device for it, yes.**

16 Q. Okay. So do -- so you don't provide devices. Is
17 that accurate?

18 **A. If there was a reason why we needed to have someone**
19 **have access to a laptop, we would do our best to**
20 **provide that access.**

21 Q. Okay. So in the complaint, the document that
22 started the lawsuit, there's a reference to Internet
23 access. Is that -- the Internet access, is that
24 just during those days and hours of the day program,
25 or are there other times when Internet access is

1 maybe -- or maybe there would be an occasion where
2 someone would linger for 15 minutes afterwards. And
3 I'm talking about community members now. I'm not
4 talking -- I'm talking about when the doors lock.

5 Q. Sure.

6 A. And -- and then it would be Sunday from 3:00 to
7 4:00, but of course on Sunday -- the Episcopal
8 Church has a slogan that says "All are welcome," so
9 certainly if someone came to a worship service, I
10 would have no way of knowing if they were accessing
11 the Internet during the worship service.

12 Q. That was my next question, is in addition to the day
13 program hours and the mealtime hours and the meal,
14 I'm assuming there are regular services at
15 St. Timothy's?

16 A. Yeah. So Wednesday 12:00 to about 12:45, like we
17 did today, people could come in to worship with us.
18 And then Sundays from 10:00 to 11:30, people could
19 come in and worship with us. And if they -- and
20 then on Monday, you know, people -- we would be open
21 to the public for the feeding ministry on Mondays
22 from 12:00 to 1:00, and then also on Tuesdays from
23 12:00 to 1:00.

24 Q. Okay.

25 A. That -- so those are the times when the community at



City of Brookings
PUBLIC WORKS/DEVELOPMENT SERVICES DEPARTMENT
898 Elk Drive, Brookings, OR 97415
(541) 469-1159, Fax (541) 469-3650, TTY (800) 735-1232
abaron@brookings.or.us

April 14, 2023

St. Timothy's Episcopal Church
C/O Bernie Lindley
401 Fir Street
Brookings OR 97415

Re: Operating a Benevolent Meal Service without a Conditional Use Permit

Dear Mr. Lindley,

The City of Brookings is providing this letter to inform you that St. Timothy's Church, located at 401 Fir Street, Brookings, OR 97415, is operating a Benevolent Meal Service without a conditional use permit in addition to a variety of other social services, including an outreach clinic, a day program and an advocacy program in violation of 17.01.040 Compliance with code provisions in the Brookings Municipal Code (BMC). To avoid enforcement and potential civil penalties, St. Timothy's Church must cease the operation of social services that are not allowed in an R-1-6 zone, and the operation of a Benevolent Meal Service without a conditional use permit.

St. Timothy's Church operates in the R-1-6 Single-Family Residential District under a de facto conditional use permit. The BMC allows religious institutions in the Single-Family Residential District to operate a Benevolent Meal Service with a conditional use permit per BMC 17.124.050. The BMC does not allow the operation of social services in an R-1-6 Single-Family Residential District either outright or with a conditional use permit.

BMC 17.160.020 designates any violations of the Land Development Code as public nuisances that may be abated and removed under BMC 8.15.090. Failure to correct the violation could result in civil penalties of up to \$720.00 per day that the violation exists, per BMC 1.05.010.

If St. Timothy's Church does not correct the violations described above within 10 days, the City may initiate enforcement proceedings under BMC 17.160.020 and 8.15.090. To correct the violation, St. Timothy's Church must cease the operation of social services that are not allowed in an R-1-6 zone, and apply for a conditional use permit to operate a Benevolent Meal Service per BMC 17.124.050.

Please feel free to reach out if you'd like to discuss St. Timothy's options for achieving compliance with the BMC.

Sincerely,

A handwritten signature in black ink, appearing to read "Anthony Baron".

Anthony Baron
Public Works & Development Services Director

CC: Janell Howard – City Manager, City of Brookings

NOTICE TO ABATE

Date: 4/14/2023

TO:	St. Timothy's Episcopal Church c/o Bernie Lindley
	401 Fir Street
	Brookings, OR 97415

Pursuant to Ordinance No. 06-O-572 of the Brookings Municipal Code, a violation exists at the following location(s) which are indicated to be in your ownership or control or you are the person causing the violation:

Street Address:	Map Number and Tax Lot:
401 Fir Street	41-13-05BC Tax Lot 7300

The nature of the violation is as follows:

BROOKINGS MUNICIPAL CODE (BMC)

17.01.040 Compliance with code provisions.

No buildings or other structures shall be constructed, improved, or altered, enlarged or moved, nor shall any use or occupancy of premises within the city be commenced or changed, nor shall any condition of or upon real property be caused or maintained, after the effective date of this code except in conformity with conditions prescribed for each of the several zones established hereunder. It shall be unlawful for any person, firm or corporation to erect, construct, establish, move into, alter, enlarge or use, or cause to be used, any building, structure, improvement or use of premises located in any zone described in this code contrary to the provisions of this code. Where this code imposes greater restrictions than those imposed or required by other rules or regulations or ordinances, the provisions of this code shall control. This code shall apply to all actions which have not reached the following steps:

- A. Site review: final approval by city staff or the planning commission;*
- B. Partitioning and subdivision: approval of preliminary (tentative) plat;*
- C. Planned unit developments: final approval by the planning commission;*
- D. Signs: final permit approval;*
- E. Variances and conditional use permits: approval by the planning commission;*
- F. Zone change: ordinance enactment. [Ord. 89-O-446 § 1.]*

St. Timothy's Church, located at 401 Fir Street, Brookings, OR 97415, is operating a Benevolent Meal Service without a conditional use permit in addition to a variety of other social services, including an outreach clinic, a day program and an advocacy program in violation of 17.01.040 Compliance with code provisions in the Brookings Municipal Code (BMC).

17.160.020 Violations.

Any building or structure set up, erected, constructed, altered, enlarged, converted, moved, or maintained contrary to the provisions of this code and any use of any land, building or premises established, conducted, operated or maintained contrary to provisions of this code shall be and the same is hereby declared a violation and a public nuisance. These public nuisances may be abated and removed pursuant to BMC 8.15.090, General abatement procedure. It is provided, however, nothing in this section requires the city to exhaust these administrative remedies prior to seeking equitable relief or damages in circuit court. [Ord. 07-O-584 § 2; Ord. 89-O-446 § 1.]

1.05.010 General penalty.

A. Violations. Every offense is a violation which may be punished by a fine up to \$720.00; provided, that where Oregon statutes impose a lesser penalty for the same offense, then the lesser penalty shall apply. Each day or part of a day for which a violation is committed or persists is a separate offense.

B. Administrative Enforcement. Where a chapter of this code provides that enforcement shall be through an administrative process, the provisions for administrative procedures shall apply rather than this section.

C. Equitable and Other Remedies Preserved. Nothing in this section prohibits the city seeking equitable relief or damages in addition to judicial or administrative enforcement of its ordinances. [Ord. 09-O-644 § 2; Ord. 07-O-592 § 2; Ord. 06-O-572 § 2.]

You are hereby directed to abate this violation by applying for a Conditional Use Permit within ten (10) days from the date of receipt of this notice. Failure to abate the violation may warrant issuance of a citation and imposition of a civil penalty of up to \$720.00. Each day's violation constitutes a separate offense. In addition, the City may abate the violation and the cost of the abatement will be charged to you.

You may dispute the existence of a violation and request a hearing by giving a written statement to the City Manager at 898 Elk Drive, Brookings, OR 97415 within ten (10) days from the date of receipt of this notice.

An error in the name or address of the person responsible shall not make this notice void, and in such case the posted notice shall be considered to be sufficient notice.

If you have any questions, please call 541-469-1159.



**Anthony Baron,
Public Work & Development Services Director**

17.160.020 Violations.

Any building or structure set up, erected, constructed, altered, enlarged, converted, moved, or maintained contrary to the provisions of this code and any use of any land, building or premises established, conducted, operated or maintained contrary to provisions of this code shall be and the same is hereby declared a violation and a public nuisance. These public nuisances may be abated and removed pursuant to BMC 8.15.090 General abatement procedure. It is provided, however, nothing in this section requires the city to exhaust these administrative remedies prior to seeking equitable relief or damages in circuit court. [Ord. 07-O-584 § 2; Ord. 89-O-446 § 1.]

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An error in the name or address of the person responsible shall not make this notice void, and in such case the posted notice shall be considered to be sufficient notice.

If you have any questions, please call 541-469-1159.



**Anthony Baron,
Public Work & Development Services Director**

April 24, 2023

VIA EMAIL AT LZIEMER@BROOKINGS.OR.US
WITH A COPY TO JANELL HOWARD,
JHOWARD@BROOKINGS.OR.US

Planning Commission
Attn: Lauri Ziemer
City of Brookings
898 Elk Drive,
Brookings, OR 97415

**Re: Request for Appeal of Notice to Abate issued to St. Timothy's Episcopal Church
April 14, 2023.**

Dear Planning Commission Members:

This office represents St. Timothy's Episcopal Church ("St. Tim's") in the above referenced matter. St. Tim's operates a church use ("Church") at the subject property at 401 Fir Street ("Property"). St. Tim's received a Notice to Abate issued by the City of Brookings (the "City") on April 14, 2023, directing the Church to file a conditional use permit application to abate the Benevolent Meal Service violation and stop providing "a variety of other social services" (the "Notice"). **On behalf of St. Tim's, we seek a public hearing to obtain an interpretation of the Brookings Municipal Code ("BMC" or "Code") regarding the alleged violation from the Planning Commission.¹**

Relief Requested

St. Tim's requests the following relief from the Planning Commission:

Determine that St. Tim's activities at the Property described as "social services" in the Notice do not violate BMC for one or both of the following reasons:

- (1) The activities described as "social services" in the Notice are typical functions conducted by Churches and Schools and are considered part of a Church or School use where they occur. As applied here, the "social services" uses at St. Tim's Church are properly classified as part of its Church use rather than a separate, stand-alone use.

¹ The City has agreed to extend the deadline for submitting objections to the Notice of Abatement as it relates to St. Tim's provision of meal services. St. Tim's reserve its rights to submit such objections at the appropriate time, if needed.

(2) The activities described as “social services” in the Notice are part of St. Tim’s legal non-conforming use of the Property and are allowed to continue.

Authority for Planning Commission Review

Pursuant to BMC 8.15.090.D.3, when a responsible party receives a notice of abatement “where the potential violation is a matter of ambiguity,” related to BMC Title 17, “the code enforcement officer determination of violation may be appealed to the planning commission pursuant to Chapter 17.156 BMC.”² The BMC does not require the recipient of a notice of abatement to first pursue review by the City Manager in BMC Title 17 cases before seeking Planning Commission Review. The Notice is a code enforcement officer determination and raises a matter of ambiguity because the Code does not define the terms social services, outreach clinic, day program, or advocacy program, and does not classify these activities as within a particular use category. These uses are typically conducted as facets of other listed uses (such as churches and schools) and should be classified as a part of those uses when they occur. Furthermore, “social services” have been an integral part of the Church use since it began operating in the 1940’s. The Notice does not account for the legal nonconforming use status of the Church.

The Planning Commission has the power to hear and decide appeals from administrative interpretations. BMC 17.156.010. When declaring the meaning and intent of the BMC, the Planning Commission interprets provisions to carry out efficient designation and classification of property, buildings, and land development. *Id.* In addition, it interprets provisions to carry out “the expressed purpose of the zoning district involved.” *Id.*

Legal Argument

A. “Social Services,” including outreach programs, day programs, and advocacy programs, are typical functions conducted by Churches and Schools and are properly considered part of a Church or School use where they occur.

BMC 17.01.040 requires that all uses and activities comply with the relevant aspects of the BMC (but, as noted below, exempts legal nonconforming uses from land use regulations). The Notice states that St. Tim’s is providing a variety of other “social services, including an outreach clinic, a day program and an advocacy program in violation of 17.01.040 BMC.” The BMC does not define “social services,” outreach clinic, day programs or advocacy programs or define these activities as uses allowed or disallowed within any zoning district. In addition, there is no defined term in the BMC that “social services” could fit into.³

² To ensure the Church preserves its rights to object to the Notice, the Church is simultaneously filing an Objection under BMC 8.15.090.D.3 with the City Manager.

³ For example, the Code defines “club” as “an association of persons (whether or not incorporated), religious or otherwise, for a common purpose, but not groups organized primarily to render a service carried as a business for profit.” BMC 17.08.030. While churches may be considered a club under this definition, the BMC

The Notice also concludes that there is no option for St. Tim's to apply for a conditional use permit to allow these "social services" at the Property. The City seems to reach this result by concluding that, if a use is not specifically listed within the allowed or conditional uses under a certain zoning district, that the use is prohibited and could not be included as part of a listed use. Since "social services," "outreach clinic," "day program" and "advocacy program" are not uses specifically listed as allowed or conditional within *any* zoning district in the City, the City appears to conclude that these activities are prohibited City-wide even when they are provided as an integral part of an allowed or conditional use.

From the Notice, we glean that the City's conception of "social services" includes any service provided to the needy, including provision of food, advice or referrals, and inviting those in need to an establishment for advice or to have fellowship with others.

The BMC does not define "church" or provide any information regarding the characteristics of this use, but does list "churches" as a use allowed conditionally within the R-1-6 zone. A dictionary definition of "church" is "a building for Christian religious activities." It is reasonable to rely on this dictionary definition since "church" is not defined in the BMC.

"Social services," including outreach programs, day programs, and advocacy programs, are Christian religious activities and typically considered church functions where they occur as part of a church use.⁴ In fact, the "social services" the City seems to be concerned about have long been typical parts of church use. Alms—the giving of money and food to the hungry—dates to biblical times. *See* Deuteronomy 15:8 ("but you shall freely open your hand to him and shall generously lend him sufficient for his need in whatever he lacks"); Proverbs 19:17 ("one who is

does not further clarify the types of activities that would constitute "social services." The Code defines "clinic" as a medical service use, which we do not believe the City intended to refer to by listing "outreach clinic."

⁴ *See*, Jackie Rehwald, *New Church in North Springfield Partners with Gathering Friends to Serve Poor, Homeless* (July 21, 2019), <https://www.news-leader.com/story/news/local/ozarks/2019/07/21/new-church-north-springfield-focuses-those-poverty-homeless/1760513001/> (Church in Springfield working to serve the "practical needs" of the poor and homeless including lowering barriers to food and clothing, "offering a safe place for foster kids and their biological parents to visit with each other, serving dinner and fellowship to those living in the neighborhood and creating a welcoming place for homeless folks who might need a drink of water or to rest on a couch for a little while"); Nancy West-Brake, *Local Church Seeks Donations for Coat Drive* (Dec. 3, 2012); Neighborhood Christian Legal Clinic, *Home*, <https://www.nclegalclinic.org/> (last visited Apr. 23, 2023) (providing legal services from the Trinity Outreach Center); Catholic Charities, *Catholic Charity assistance near you.*, https://www.needhelppayingbills.com/html/catholic_charities_financial_a.html (last visited Apr. 23, 2023) (list of nationwide network of churches that provide emergency housing, financial assistance, clothing, rental assistance, medical needs, free holiday assistance, counselling, immigration programs, and employment services); Fame Church LA, *FAME Legal Clinic*, <https://www.famechurchla.org/free-legal-clinic/> (last visited Apr. 23, 2023); *Madison Avenue Christian Church Continues Its Community Ministry During Crisis, Including Meals*, Northern Kentucky Tribune (Apr. 7, 2020), <https://www.nkytribune.com/2020/04/madison-avenue-christian-church-continues-its-community-ministry-during-crisis-including-meals/>.

gracious to a poor man lends to the lord and he will repay him for his good deed”). Many churches in Brookings participate in these same activities as part of their church use.⁵

Other conditional uses in residential zones, such as schools, often provide social services, including outreach programs, day programs, and advocacy programs and these activities are considered part of the school use when they occur.⁶ For example, the Brookings-Harbor School district opened the Coast Community Health Center in November 2022, which seeks to provide health care to all students who need it free of cost, including well child checks, immunizations, follow-up visits and more.⁷

Typical elements of a use should be treated as part of that use for purposes of BMC regulations even when each detail of the use is not specified by the BMC to avoid unreasonable results. This is especially true when the BMC does not provide a definition of a use or any guidance on the characteristics of that use. Typical elements of a church include providing service to the needy, including providing advice or referrals, and inviting those in need to an establishment for advice or to have fellowship with others. We urge the Planning Commission to determine that the “social service” related activities occurring at St. Tim’s listed in the Notice are part of its church use, which is authorized at the Property.

B. St. Tim’s Operation of the Church at the Property is a Legal Nonconforming Use Which Includes “Social Services.”

1. The Church is a legal nonconforming use because it predates the 1989 Land Development Code.

The Notice alleges that St. Tim’s is violating BMC 17.01.040, because the Church conducts “a variety of other social services, including Outreach Clinic, Day Program, and Advocacy Program.” From the wording of the Notice, it appears the City intended this to be a non-exclusive list and is alleging that any “social service” use, which is not defined by the Code is prohibited at the Property.

BMC 17.01.040 only applies to buildings, structures, use and occupancy *established after the effective date of the Code*. If a building’s use was in place before the Code was enacted, then those provisions do not apply because it is a nonconforming use. BMC 17.01.030. BMC 17.120 governs nonconforming uses and allows nonconforming uses to continue, subject to that section’s regulations.

⁵ Brookings Nazarene, *Community Care*, <https://www.brookingsnaz.org/community-care> (last visited Apr. 21, 2023); Trinity Lutheran Church, *Outreach*, <https://tlcbrookings.org/outreach> (last visited Apr. 21, 2023)

⁶ See also, Beaverton School District, *Clothes for Kids*, <https://www.beaverton.k12.or.us/departments/communications-community-involvement/volunteer/clothes-for-kids> (last visited Apr. 23, 2023); Mills Street Elementary, *Counseling*, <https://www.lisd.net/Page/16818> (Apr. 23, 2023);

⁷ School Based Health Center – Coast Community Health, Brookings-Harbor School District, <https://www.brookings.k12.or.us/apps/pages/sbhc> (last visited Apr. 21, 2023); Reynolds High School, *College and Career Center*, <https://www.reynolds.k12.or.us/rhs/college-and-career-center-0> (last visited Apr. 23, 2023).

As the Notice seems to admit (stating that St. Tim's "operates under a de facto conditional use permit"), St. Tim's has existed at 401 Fir Street for more than 30 years before the Land Development Code was adopted in 1989, and is a legal nonconforming use governed under BMC 17.120.

The BMC defines "use" as the "purpose for which land and/or a structure is designed, arranged, or intended, or for which it is occupied or maintained." BMC 17.08.210. The "use" of the Church at the Property therefore includes the entirety of the operations occurring at the Property. Even if some elements of the Church use would not be allowed under the current BMC, which St. Tim's disputes, the nonconforming use protections apply to all of the Church operations that predate the Code, including any "social services" conducted as part of the Church operations, so long as those uses have been maintained over time. St. Tim's has continuously conducted "social services," as the City appears to envision that term, since its establishment and has the right to continue these uses under BMC 17.120.

2. The Church's legal nonconforming use includes "social services," including an outreach program, day program and advocacy program.

As we discuss above, the Code does not define "social services," "outreach clinic," "day program," or "advocacy program." The Notice also seems to require St. Tim's to cease its conduct of "a variety of other social services" which are not specified. From the Notice, we glean that the City's conception of "social services" includes any service provided to the needy, including provision of food, advice or referrals, and inviting those in need to an establishment for advice or to have fellowship with others.

Since its establishment at the Property, St. Tim's has offered services or alms to the needy in furtherance of Christian beliefs to feed the hungry, respect the dignity of every human being, and build community. St. Tim's use of the Property as a Church within the Episcopalian faith *necessarily* includes elements of service to the poor. These elements include opening the Church as a sanctuary for prayer, providing advice on a variety of topics, providing opportunities for fellowship with others, and providing information to the community. These core religious functions, in some form, have continuously been part of the Church use at the Property since its inception and have not ceased for any two-year period. Therefore, the Church maintains the legal right to continue these uses as part of its Church operations. BMC 17.120.

Thank you for your review of these important issues.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Allison J. Reynolds', written in a cursive style.

Allison J. Reynolds

BROOKINGS PLANNING COMMISSION MINUTES
May 2, 2023

CALL TO ORDER

The regular meeting of the Brookings Planning Commission was called to order by Chair Watwood at 7:00 pm in the Council Chambers at Brookings City Hall followed by the Pledge of Allegiance.

ROLL CALL

Commissioners Present: Anthony Bond, Cody Coons, Skip Hunter, Clayton Malmberg, Gerry Wulkowicz, Chair Skip Watwood

Staff Present: PWDS Director Tony Baron, Deputy PWDS Director Lauri Ziemer

Others Present: 4 audience members

PLANNING COMMISSION CHAIR PERSON ANNOUNCEMENTS - None

PUBLIC HEARINGS

- 4.1 In the matter of File No. CUP-5-23, a request for approval of a Conditional Use Permit to operate a Short Term Rental facility at 312 Railroad Street; Assessors Map & Tax Lot No. 4113-05CA-02300

There was no ex parte contact, bias, personal interest, or conflicts of interest declared and no objection to the jurisdiction of the Planning Commission to hear the matter. The public hearing was opened at 7:06 pm. PWDS Director Tony Baron reviewed the staff report.

Applicant's representative, Ron Reel, Premier Ocean Properties, was present to answer any questions. No members of the public spoke in opposition and no participant requested additional time to submit materials. Public hearing was closed at 7:10 pm.

The Commission deliberated on the matter. **Motion made by Commissioner Wulkowicz to approve File CUP-5-23 a request for a Conditional Use Permit to operate a short term rental at 312 Railroad Street based on the findings and conclusions stated in the staff report and subject to the Conditions of Approval; motion seconded and with no further discussion by a 6-0 vote the motion carried.**

Motion made by Commissioner Malmberg to approve the Final Order regarding file CUP-5-23, based on the findings and conclusions stated in the staff report and subject to the Conditions of Approval; motion seconded and with no further discussion by a 6-0 vote the motion carried.

- 4.2 In the matter of File No. CUP-6-23, a request for approval of a Conditional Use Permit to operate a Short Term Rental facility at 1326 Crissey Circle; Assessors Map & Tax Lot No. 4113-0BC-01001

There was no ex parte contact, bias, personal interest, or conflicts of interest declared and no objection to the jurisdiction of the Planning Commission to hear the matter. The public hearing was opened at 7:12 pm. PWDS Director Tony Baron reviewed the staff report.

Applicant's representative, Ron Reel, Premier Ocean Properties, was present to answer any questions. No members of the public spoke in opposition and no participant requested additional time to submit materials. Public hearing was closed at 7:16 pm.

The Commission deliberated on the matter. **Motion made by Commissioner Bond to approve File CUP-6-23 a request for a Conditional Use Permit to operate a short term rental at 1326 Crissey Circle based on the findings and conclusions stated in the staff report and subject to the Conditions of Approval; motion seconded and with no further discussion by a 6-0 vote the motion carried.**

Motion made by Commissioner Wulkowicz to approve the Final Order regarding file CUP-6-23, based on the findings and conclusions stated in the staff report and subject to the Conditions of Approval; motion seconded and with no further discussion by a 6-0 vote the motion carried.

4.3 In the matter of File No. M3-1-23, a request for a partition to divide a .59 acre parcel into two (2) parcels, located at 610 Hassett Street; Assessor's Map & Tax Lot No. 4013-31DD-04000;

There was no ex parte contact, bias, personal interest, or conflicts of interest declared and no objection to the jurisdiction of the Planning Commission to hear the matter. The public hearing was opened at 7:18 pm. PWDS Director Tony Baron reviewed the staff report.

The applicant, Scott Sanders, was present to answer any questions.

John Marrington, 612 Hassett St, Brookings, spoke as an interested party and advised his property adjoins the parcel and is concerned the natural drainage between the properties is deteriorating his driveway. PWDS Director Baron advised that as the property is developed the property owners should work together to address the issue and potentially connect to the existing City storm drain on Hassett.

No members of the public spoke in opposition and no participant requested additional time to submit materials. Public hearing was closed at 7:45 pm.

The Commission deliberated on the matter. Commission Malmberg felt the rezone was not in the best interest of the City citing the shortage of affordable multi-housing units and the developing of more single family housing does not equate to long term housing when single family residences can be turned into short term rentals which does not solve the existing housing shortage. The Commission deliberated on the matter.

Motion made by Commissioner Malmberg to approve File M3-1-23 a request for a partition to divide a .59 acre parcel into two (2) parcels, located at 610 Hassett Street based on the findings and conclusions stated in the staff report and subject to the Conditions of Approval; motion seconded and with no further discussion by a 6-0 vote the motion carried.

Motion made by Chair Watwood to approve the Final Order regarding file M3-1-23, based on the findings and conclusions stated in the staff report and subject to the Conditions of Approval; motion seconded and with no further discussion by a 6-0 vote the motion carried.

MINUTES FOR APPROVAL

5.1 Minutes of regular Planning Commission meeting of March 7, 2023

Motion made by Commissioner Bond to approve the Planning Commission minutes of March 7, 2023; motion seconded and with no further discussion by a 6-0 vote the motion carried.

UNSCHEDULED PUBLIC APPEARANCES - None

REPORT FROM THE PLANNING STAFF - None

COMMISSION FINAL COMMENTS – None

ADJOURNMENT

Chair Watwood adjourned the meeting at 8:05 pm.

Respectfully submitted,

Skip Watwood, Brookings Planning Commission Chair
Approved at the June 27, 2023 meeting

June 27, 2023

Allison J. Reynolds
760 SW Ninth Avenue, Suite 3000
Portland, OR 97205
D. 503.294.9625
allison.reynolds@stoel.com

VIA EMAIL

Planning Commission
Attn: Lauri Ziemer
City of Brookings
898 Elk Drive,
Brookings, OR 97415

**Re: Legal Argument in Support of St. Timothy's Church Appeal of the April 14, 2023,
Notice to Abate.**

Dear Planning Commission Members:

This office represents St. Timothy's Episcopal Church ("St. Tim's") in the above referenced matter. St Tim's operates a church use ("Church") at the subject property at 401 Fir Street ("Property"). St. Tim's received a Notice to Abate issued by the City of Brookings (the "City") on April 14, 2023, directing the Church to file a conditional use permit application to abate the Benevolent Meal Service violation and stop providing "a variety of other social services" (the "Notice"). Prior to the request for an appeal, the City agreed to stay the benevolent meal service violation because of the ongoing federal litigation regarding the City's Benevolent Meal Service ordinance. **The staff report contains several factual mischaracterizations which we correct in this submission. This letter also provides further support that St. Tim's activities at the Property, (referred to as the "social services" in the Notice), are a typical church use and do not violate the Brookings's Municipal Code ("BMC").**

I. DISCUSSION

A. Clarification of the activities occurring at St. Tim's Church.

The facts cited by the Staff Report supporting the staff recommendation to deny the appeal and continue the City's enforcement actions against St. Tim's misstate or misconstrue the

current activities at the Property. It important to correct the record of the Church's activities, since the City is threatening enforcement action based on what appear to be incorrect assumptions.

Attached as exhibits A & B to this letter are Letters from Father Bernard Lindley ("Fr Bernie") and Sister Cora Rose ("Sister Cora"). As explained in the letters from Fr Bernie and Sister Cora, the following activities that the City appears to classify as "social services" and which appear to be the subject of the Notice are ongoing at the Church:

- "Advocacy clinic" and "legal clinic": The "advocacy clinic" and "legal clinic" are a time when the Church opens its doors for visitors to receive spiritual advice from Fr. Bernie, Deacon Linda and Sister Cora. This guidance includes assisting people in navigating processes like obtaining birth certificates and identification cards, enrolling in health insurance, connecting to therapy and treatment, and applying for jobs and housing, and referrals to service providers. As stated by Sister Cora, the "legal clinic," is part of the "advocacy program, but is focused on either assisting with or providing for referrals for legal issues . These activities coincide with the "day program" and occur within the same time period: Monday, Wednesday and Friday from 9am to noon. St. Tim's also occasionally refers to this period of time when the Church is open (Monday, Wednesday, and Friday from 9 AM to noon) as office hours.
- "Day program": The "day program" consists of the Church opening its doors from 9am to noon on Monday, Wednesday, and Friday to allow people to enter the Church building use shower facilities, participate in fellowship with others, rest, and access the advocacy and legal clinic which are a part of what goes on in the Church during the day program.
- Attendance: Approximately 20-30 people total (including those seeking advocacy and legal assistance) visit the Church during the day program hours.
- Staffing: The Church has several paid staff (all part time) that are involved in the various activities at the Church in addition to the day program (and its components). The paid staff involved with the advocacy program are Fr Bernie, Sister Cora, and Machell Carroll. In addition, St. Tim's has two part-time parish secretaries and one unpaid deacon, who primarily are involved with church services on Sundays, but sometimes volunteer in the day program and advocacy clinic. As is common at any church, parishioners also volunteer their time to provide ministry. During the day program hours there are typically 5 paid staff or volunteers present at the Church providing ministry in one way or another.

Several statements in the Notice and Staff Report seem to contradict these facts and are inaccurate as follows:

- The Staff Report states that “the City has also become aware of information suggesting that the number of people served by the Church’s social services activities exceeds the number of church parishioners,”¹ but does not provide evidence to support this conclusion. Father Bernie’s letter clarifies that the Church welcomes around 45 people to its Sunday services, while seeing up to 30 people during its office hours (M, W, F from 9:00-12:00).
- The Staff Report inserts *select* portions of the deposition of Father Bernie in the federal litigation that overstate the activities occurring at the church. The Staff Report states that “the Church operates a “legal” clinic for 19-20 hours per week. As the letter from Sister Cora indicates, she only meets with “clients” during office hours which occur during the day program. People are not coming and going from the church to visit the legal clinic for 19-20 hours per week.
- The Staff Report misstates that the Church has 6-7 paid employees “for these activities,” referring to the “social services.” Father Bernie is a paid as a member of the clergy, not just for advocacy. Sister Cora and Machell Carroll are paid primarily for their work administering alms and providing guidance through the day and advocacy program. In addition, there are two other paid employees, the parish secretaries, whom are associated with the administering of alms during office hours and they, too have additional voluntary roles at the Church beyond assistance with the day program and office hours.
- The Notice indicates that an “outreach clinic” is occurring and the Staff Report states that weekly HIV testing occurs at the Church. The outreach clinic is no longer occurring at the Church. Testing for HIV and communicable diseases is offered by a third party on St. Timothy’s property during office hours, currently one day per week.

B. St. Tim’s Has Provided Sufficient Evidence that “social services,” including the particular social services at issue are a typical church use.

The Staff Report concedes that the BMC does not provide a definition of “church” use or otherwise explain what types of activities this use includes. Thus, what constitutes a “church” is a matter of interpretation. Staff advocates for using the dictionary definition of church as a “building for public and especially Christian worship.” We do not necessarily disagree with that definition, since “worship” is a broad term that encompasses many activities (for example, Black’s Law Dictionary defines public worship as “[w]orship conducted by a religious society according to the society’s system of ecclesiastical authority, ritual propriety, and rules and regulations.”)² and the leaders of St. Tim’s and other congregations regularly refer to their

¹ Staff Report at 12.

² *Worship*, BLACK’S LAW DICTIONARY (11th ed. 2019).

service of the poor as “worship.” However, Staff chooses to narrowly define “worship” as including only sermons held for the public at a church service (typically on Sundays). This narrow definition is not consistent with the activities churches typically engage in and is not a reasonable reading of the BMC.

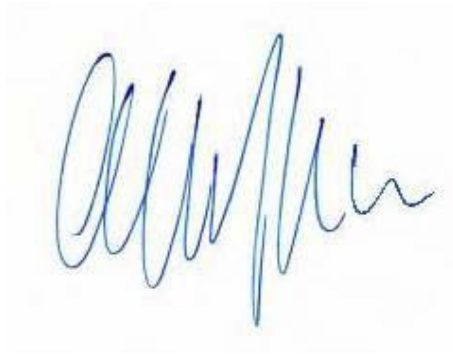
“Church” use should be defined as encompassing both sermons and the typical activities churches engage in during the week as part of their ministry. Service ministries are a key tenant of the Christian faith and churches regularly engage in serving the poor. The Staff Report states that St. Timothy’s has not provided sufficient evidence of the fact that services for the poor are a typical church use. Several members and leaders of nearby churches have submitted letters to the record regarding their service ministries and their experience with churches as people of faith and leaders who have devoted their lives to ministry. In addition to this testimony from religious experts, we have attached the following evidence of church service activities. These activities, many of which are occurring in residential zones in Brookings, are examples of church service to the poor. The types of service ministry St. Tim’s engages in (as clarified above) are typical church functions and must be included in the City’s interpretation of “church” use.

- **Clarification of St. Tim’s use, history and service as part of church use**
 - Letter from Reverend Bernard Lindley
 - Letter from Sister Cora Rose
- **A day program that provides showers, internet and weekly HIV/HEP-C screening is a typical church use:**
 - Jackie Rehwald, *New Church in North Springfield Partners with Gathering Friends to Serve Poor, Homeless* (July 21, 2019), <https://www.news-leader.com/story/news/local/ozarks/2019/07/21/new-church-north-springfield-focuses-those-poverty-homeless/1760513001/>;
 - *The Connecting Grounds, Get Involved*, <https://www.theconnectinggrounds.com/getinvolved> (last visited June 16, 2023).
- **A legal clinic is a typical church use:**
 - Neighborhood Christian Legal Clinic, *Home*, <https://www.nclegalclinic.org/> (last visited Apr. 23, 2023)
 - Fame Church LA, *FAME Legal Clinic*, <https://www.famechurchla.org/free-legal-clinic/> (last visited Apr. 23, 2023)
 - Catholic Charities of Oregon, *Immigration Legal Services*, <https://www.catholiccharitiesoregon.org/services/immigration-legal-services/> (last visited June 16, 2023)
- **An advocacy team/caseworker assistance is a typical church use:**
 - Brookings Nazarene, *Community Care*, <https://www.brookingsnaz.org/community-care> (last visited Apr. 21, 2023)

- Catholic Charities of Oregon, *Services*, <https://www.catholiccharitiesoregon.org/services/> (last visited June 16, 2023)³

Thank you for your time and consideration.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Allison J. Reynolds". The signature is fluid and cursive, with the first name "Allison" being more prominent than the last name "Reynolds".

Allison J. Reynolds

³ In our request for appeal, we included a variety of sources that showed other church activities that could be considered social services but were allowed. We have not listed those articles here, but still attached them to our submission.

EXHIBIT A

June 27, 2023

Via Email

Planning Commission
Attn: Lauri Ziemer
City of Brookings
898 Elk Drive
Brookings, OR 97415

**Re: Evidence in Support of St. Timothy's Episcopal Church Appeal of April 14, 2023
Notice to Abate.**

Dear Planning Commission Members:

I am the Reverend Bernie Lindley, the vicar of St. Timothy's Episcopal Church here in Brookings. This letter is my response to the Notice to Abate issued to St. Timothy's Church to stop providing "social services" to the community and the statements and conclusions contained in the Staff Report published on June 15, 2023. I grew up in Brookings, Oregon, was baptized at St. Timothy's in 1973, and was a parishioner until leaving for college in the fall of 1985. I returned to my hometown in 1990 and became the vicar in 2008. I have served as vicar since then.

I was dismayed to receive the Notice to Abate that, for the first time, ordered our Church to stop providing "social services," which the City Code does not define, but City Staff appear to believe includes typical activities at our Church and other churches and that are a key tenet of our religious practice. We knew the City had concerns about our meal program (which we are working through separately and is not the subject of this appeal) but were surprised to learn that the City apparently believes that our other activities beyond services on Sundays are not allowed and could never be allowed as part of a church use. This is especially concerning since these activities have been going on for decades without us receiving any notice that there was a problem—including in 1999, when the Church received a modification to its de facto Conditional Use Permit after a public hearing that allowed us to expand. The City and County regularly connect needy citizens to our Church for assistance and fellowship, including as recently as the weekend of June 18, 2023. The Notice to Abate does not identify any operational problems like traffic or noise that our activities are causing. It simply decides to restrict our religious practice based on undefined terms in the City Code.

No one should want the City to dictate how a church and its members worship and I urge you to consider the disturbing precedent this enforcement creates for the community and grant our appeal.

The Staff Report states that we have not provided enough evidence of how "social services" are part of a church's function or of the activities that have long been ongoing at St.

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Timothy's. This letter provides that additional information based on my knowledge as a parishioner and vicar at the Church.

Clarification of Activities Actually Occurring at the Church

All the vicars who preceded me at St. Timothy's from the time I began attending as a child distributed alms to the needy in the Brookings community. I continued to distribute alms after I became vicar. For at least the last 30 years, our church office has been open Monday, Wednesday, and Friday, from 9:00 a.m. to noon. During that time, we have always been available for counseling, almsgiving, and spiritual care to the community at large. Our current almsgiving program includes the following elements (in addition to the meal service which is not part of this appeal):

- A "day program" staffed by two church employees, Machell Carroll and Sister Cora Rose, as well as approximately 2-3 volunteers per day. These volunteers sometimes include our two part-time clergy. The team helps me distribute alms, which is difficult to manage as a part-time vicar. (I am paid for 12 hours of work per week as vicar.) This day program includes the "advocacy program" cited in the City's notice and these activities all take place during the Monday, Wednesday and Friday 9:00 a.m. to noon timeframe during the Church's open hours. During this time, St. Timothy's opens its doors for community members to pray, drink coffee, use the Church's internet, charge their phones, use the Church's two showers, obtain laundry vouchers (we have no laundry machines).
- On Mondays, Wednesdays, and Fridays from 9:00 a.m. to noon during the day program, usually about five people, including Sister Cora Rose, Machell Carroll, and some volunteers, offer assistance to visitors trying to navigate processes like obtaining birth certificates and identification cards, enrolling in health insurance, connecting to therapy and treatment, and applying for jobs and housing and provide referrals to service providers. Additionally, Sister Cora Rose is a licensed attorney who offers counseling and advice to individuals who show up at the Church during our Monday, Wednesday and Friday open hours with questions about issues such as citations, court fines, records expungement, SSI, food stamp benefits and who need referrals to attorneys with various skills. These activities of almsgiving are referred to as the "Advocacy Program."
- The "Outreach Program" activities, were established during the COVID-19 pandemic to give people vaccines and are no longer occurring at the Church.

On any of the days we are open for the day program, there are between 20-30 total people who come for us to serve in the name of Jesus Christ. As further detailed below, the visits are typically staggered and commonly 15 to 20 people visit the Church building to receive services at any one time during these Monday, Wednesday and Friday morning open hours.

Most of the unhoused people whom we serve arrive by foot or on a bicycle. Some of them live in their cars and park in our parking lot while they are in the building. Our staff, volunteers, and community partners also use some of the parking spaces when they provide alms during the day program. However, my observation is that there are always empty parking spaces except when there is an event across the street in Azalea Park. We do not allow overnight camping on our property. As the Commission knows, St. Timothy's is enrolled in the Property Watch program pursuant to which the Brookings police can cite individuals for trespass when they find someone on our property after 6:00 p.m.

Because the people whom we serve are not all in the building at once, arriving at various times while we are open, it never gets to the point where the building feels crowded. Generally, there are about 20-25 people (including staff and volunteers) in the building at once and when the weather is good a few outside on the picnic tables or in the smoking area. People who visit during office hours generally stay for a little over an hour. This is significantly less than the number of people who attend Sunday service, which can have as many as 45 people present. In all of our worship activities, there is an atmosphere of congeniality and gratitude that I find invigorating. Even though I am only paid to be a quarter-time priest, I gladly put in triple and quadruple the hours that the congregation expects of me.

The church activities identified in the Staff Report are fundamental to the faith of Episcopalians, St. Timothy's, and me specifically.

The services that we provide are central to our deeply held religious beliefs. Respecting the dignity of every human being and building community are necessary acts during our time on Earth. Every three years, deputies (delegates) and bishops from each Episcopal Diocese meet in a General Convention, which serves as the Episcopal Church's governing body. I was a delegate to the General Convention in 2018. Among other things, the General Convention has the authority to adopt resolutions that reflect a consensus about how the faith body feels about certain issues. I feel compelled to act in conformance with our resolutions.

Because of how central giving alms is to the Episcopal faith, Canon 9, section 6 of the Episcopal Church requires the priest in charge of a congregation to distribute Alms and Contributions to "such pious and charitable uses as the Rector or Priest-in-Charge shall determine." The feeding ministry and all other ministries offered at St. Timothy's—including the advocacy program, day program, and until recently, the outreach clinic—are not adjacent to our faith. They are themselves acts of worship and part of St. Timothy's function as a church.

These activities are common to religious practice and the types of services a "church" would provide. For example, as explained in the Book of James:

What good is it . . . if someone says he has faith but does not have works? Can that faith save him? If a brother or sister is poorly clothed and lacking in daily food, and one of you says to them, "Go in peace, be warmed and filled," without giving them the

things needed for the body, what good is that? So also faith by itself, if it does not have works, is dead. (James 2:14-17.)

Similarly in the Book of Common Prayer, Baptismal Covenant, it is noted that faith demands “striv[ing] for peace and justice among all people, and to respect the dignity of every human being.”

In addition, even the City has worked with St. Timothy’s to provide these services. It is important to me that St. Timothy’s be a good neighbor to everyone. We consistently cooperate with Brookings police. Indeed, on several occasions, the police have referred people in need with nowhere else to go at the Church for fellowship, counseling and advice. In fact, St. Timothy’s now invites a variety of community stakeholders to its weekly staff meetings. The Brookings community resource officer, who is part of the Brookings police department, regularly attends, as do representatives of community care organizations (CCOs), Adapt, Coast Community Health, and Oregon Department of Human Services officials. The goal is to ensure that city officers are aware of our faith activities as a resource for those in the community. The community resource officer often spends time at the day program interacting with the individuals we serve.

The vicars of St. Timothy’s have administered these “social services” or, as we call them, “alms” to the community since prior to 1989.

St. Timothy’s Episcopal Church has always, since its very inception, given alms to the needy. In the 1980s, the alms focused on programs to provide rent and utilities assistance for people in the community going through difficult financial times.

In the 1990s, the alms concerned providing rent and utilities assistance, as well as gasoline and bus tickets if needed. In 1997, when I got re-involved with the congregation, the Church was administering alms mostly through Fr. Bill, the vicar at the time. The City was certainly aware of Church activities during this time because Fr. Bill served on City committees. In 1999, the Church building was expanded through a modification to the de facto Conditional Use Permit which included a public hearing process. The City’s decision found that the activities at the Church at that time complied with the Conditional Use criteria. The activities occurring at the church at that time appear to be identical to the activities cited in the Notice of Abatement. The City has not explained why the same activities are now impermissible and is interfering with our long-standing religious practice.

In the 2000s, we saw a shift in what was needed by visitors during our day program. The biggest amount of our almsgiving continues to be for rent and utilities, but our visitors began to need shoes, coats, hygiene items, and assistance with paying for car repairs so the focus of our program shifted to ensure we were providing assistance in the way it was most needed. During my time as vicar, I have continued administering alms through the programs described above and as there was a need in the community.

We do these things because our faith tradition teaches that all people are created in the image of God and deserve to be treated with dignity and respect. As followers of Jesus Christ, we believe that whatever we do for the poor and downtrodden, we do for Jesus Christ himself. If our Church fails to respond to the needs of someone in distress, then we fail to reflect God's love in the world. Our church continues its long-time tradition of also giving through service and advice for the less fortunate through our open hours three days per week.

Thank you for your time.

Best regards,

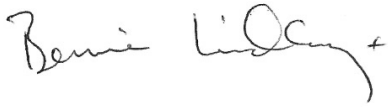
A handwritten signature in cursive script, reading "Bernie Lindberg". The signature is written in dark ink and includes a small cross-like mark at the end.

EXHIBIT B

June 27, 2023

Via Email

Planning Commission
Attn: Lauri Ziemer
City of Brookings
898 Elk Drive
Brookings, OR 97415

**Re: Evidence in Support of St. Timothy's Episcopal Church Appeal of April 14, 2023
Notice to Abate.**

Dear Planning Commission Members:

I am Rev. Sister Cora Rose, the ordained Evangelical Lutheran Church in America (ELCA) Minister of Word and Service (deacon). I am under call by the Oregon Synod of the ELCA to legal aid ministry of poverty alleviation at St. Timothy's. The ELCA and Episcopal Church are in full communion, meaning they share clergy, a common faith, and mission/ministry in the world together. This letter is my response to the Notice to Abate issued to St. Timothy's Episcopal Church (St. Timothy's or the Church) to stop providing "social services" to the community and the statements and conclusions contained in the Staff Report published June 15, 2023. I grew up in Brookings, Oregon and attended summer Vacation Bible School at St. Timothy's and as a teen completed my volunteer hours for the rite of Affirmation of Baptism (Confirmation) at the Brookings Food Bank, which was then located within St. Timothy's. I continued to visit St. Timothy's for weekday worship while in college and graduate school, when home on school breaks. I became a part-time staff member of St. Timothy's in 2022 and have served as the ELCA deacon on the Advocacy Team since then.

For years, the Church has operated without question from the City of Brookings. I was surprised when the City issued a Notice to Abate. That was the first time I had heard of the Church's regular ministry activities being classified as "social services," a term that is not in the Brookings City Code. Then after the Staff Report was released, it was surprising to hear that City Staff appears to believe that a church welcoming community members during the day is not a typical "church use." While we knew the City had concerns about our meal program, I was shocked when "church" was defined to exclude any activities beyond services on Sunday and that St. Tim's longstanding faith practices were not being considered a church use—especially since these activities have been going on since the Church opened; it has always opened its doors to people during the day.

The Staff Report mischaracterizes the activity occurring on St. Timothy's property and states that we have not provided enough evidence of how "social services" are a "typical" church use. This letter provides clarification of facts that form the basis of the Staff Report and provide the requested additional information based on my knowledge as regular attender and member of the Advocacy ministry at the Church.

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Existing Church Activity:

Every Monday, Wednesday, and Friday the church has Office Hours for a 3-hour period from nine am to noon. This is sometimes called the “day program.” The number of people who visit the Church during the day are fewer than the number of meals served at the kitchen. When the Church opens its doors for people to visit, rest, seek advice, take showers, receive spiritual guidance from Fr. Bernie or Deacon Linda, to pray alone or with church ministry staff or volunteers, or meet with the advocacy team or me, there is usually a slow but steady stream of people in and out of the building. Generally, less than 15 people show up during office hours period to take showers. In addition, usually around 4-8 people participate in the advocacy program, including the legal advocacy ministry. I usually meet with 2-3 people seeking legal advice; others speak with our volunteers about other needs. Simply put, these activities are no different than parishioners coming to the Church during the week for counseling, to pray, or for other quintessential church services.

Similarly, the “legal clinic” (I refer to it as the legal advocacy ministry) which I administer is misconstrued in the Staff Report. While I offer legal advice to people who come in during open hours, this is not a separate program. It is provided as part of the administering of alms or as we call it the “advocacy program.” We sometimes call it a clinic because we want to be clear that during that time, while I am an employee of St. Timothy’s, I am not its attorney. Again, this is not a typical legal clinic, which runs all day with multiple attorneys. If the clergy or other members of the advocacy team identify that someone has a legal question, they can visit me during office hours, and I will do my best to assist them or refer them to someone who can assist them; often, I am making connections for others, as is common for a church leader or staff member. I also provide spiritual counsel when desired by the people meeting with me. I probably spend about 9-10 hours a week with folks at St. Timothy’s (all during our open office hours). I usually work an additional 10-15 hours independently on client matters and research from home, a community partner organization location, or at court. These activities do not take place with members of the public at the church, so are not relevant to the Notice to Abate.

These alms have been administered by St. Timothy’s since before 1989.

I am familiar with St. Timothy’s faithful dedication to alms-giving as something that has occurred since my childhood. I attended the ecumenical Vacation Bible School, which provides a form of childcare for a week while school is out for the summer, in the late 80s and early 90s. I attended the ecumenical Lenten midweek evening services with my family growing up, with a soup supper open to the public and donations collected for alms, usually for hunger-relief efforts.

I was aware of 12-step groups meeting at the church regularly while growing up. It seemed like cars were in the parking lot most evenings when we drove by.

My childhood pastor (Rev. Dr. Gordon E. Myrah of Trinity Lutheran Church in Brookings) played a role in founding the Brookings food bank, and my understanding is that its first location was the “old” fellowship hall at St. Timothy’s. It was still there when I volunteered as a teen in the late 1990s and early 2000s, stacking cans of food and helping needy families and seniors select items to fill boxes of food. I enjoyed serving within the church building with other people

of faith, and so continued to volunteer periodically even after my leadership volunteer hours were complete.

It was because St. Timothy's is open during the week that I found my way back while visiting home on college breaks. I would travel to and from college on the weekends, so I found spiritual support and community at St. Timothy's during its open office hours and noon prayer service. I brought college friends with me, sometimes, who were in discernment about spiritual matters. We could walk in and receive prayer and a blessing, and also use the quiet space of the church nave to pray or converse.

When the Community Kitchen began in the aughts, my mother called me excitedly to tell me about it. She volunteered at the Lutheran location and I joined in volunteering when I would visit home. I was also aware of St. Timothy's participation in the Community Kitchen.

My ordination followed the Rite of Ordination to the Ministry of Word and Service for the Evangelical Lutheran Church in America. The Rite includes the following exhortations and prayers spoken by the Bishop and the gathered assembly which explain that a key tenant of our faith is to provide service to the poor:

"All baptized Christians are called to share in Christ's ministry of love and service in the world, to the glory of God and **for the sake of the human family** and the whole creation. You have been called as minister/s of word and service to give leadership in the church's mission to proclaim the gospel through word and deed."

"The Spirit of the Lord is upon me, because he has anointed me to bring good news to the poor. He has sent me to proclaim release to the captives and recovery of sight to the blind, to let the oppressed go free, to proclaim the year of the Lord's favor." (Luke 4:18-19)

"There are varieties of gifts, but the same Spirit; and there are **varieties of services**, but the same Lord; and there are **varieties of activities**, but it is the same God who activates all of them in everyone. To each is given the **manifestation of the Spirit for the common good.**" (1 Corinthians 12:4-7)

"For Cora, called to the ministry of word and service in the church, that, sustained by your Holy Spirit, she may carry out this ministry with joy and a spirit of bold trust, **serve your people and the world in need**, and glorify your name..."

"For the **mission of the church**, that in faithful witness it may proclaim the gospel and in humble love **serve all in need**..."

"For the poor, the persecuted, the sick, the lonely, the forgotten, and all who suffer; for refugees, prisoners, and all who are in danger; that they may be relieved and protected."

"Holy God, holy and mighty, holy and immortal, we thank you for sending your Son, Jesus Christ, your Word made flesh, who proclaimed your gracious reign in words and **in deeds of service to the poor and the suffering; who humbled himself, taking on the form of a**

servant; and who showed us that the one wishing to be great must be servant of all. We praise you for the many ministries in your church, and especially this day for calling people to the ministry of word and service: to proclaim your life-giving word in faithful and diverse ways, to equip all the people of God for their work of ministry, **and to serve a world in need.”**

“Cora, care for God’s people, bear their burdens, and do not betray their confidence. Serve the needy, care for the sick, comfort the distressed, and, through words and actions, witness faithfully to God’s love for all people. Cross every barrier that stands between the church and its ministry in the world. Seek out those places where the gospel of Jesus Christ meets the world’s need.”

Thank you for considering this information.

Sincerely,

A handwritten signature in black ink, consisting of the letters 'C' and 'R' followed by a horizontal line.

Rev. Sister Cora Rose, Esq.
ELCA Deacon

EXHIBIT C

Church Use Examples Zoning

Church	Service Provided	Zone
Submitted by St. Tim's		
The Connecting Grounds (Springfield, Illinois)	Computer lab and rest area	Commercial
Trinity Lutheran Church, Legal Outreach Center (Indianapolis, Indiana)	Legal services	Special Commercial District (multi-use zone that combines commercial and non-commercial uses, including residential)
Fame Church (Los Angeles, CA)	Legal services	Commercial (set up as a mixed-use zone that allows some residential development)
Brookings Nazarene (Brookings, OR)	Guidance/counselling; Food pantry	R-1-6
Trinity Luther Church (Brookings, OR)	Collects donations for the food bank	R-1-6.
Brookings Harbor Foursquare Church (Brookings, OR)	Collects and distributes goods to those in need	R-3
Brookings Presbyterian Church (Brookings, OR)	Hosts bi-weekly Alcoholics Anonymous meetings	R-3
Other Churches Provided to Planning Commission Independently		
Gloria Dei Lutheran Church (Coos Bay, OR)	Food pantry; first step program;	Small Lot Residential
Crescent City United Methodist Church (Crescent City, CA)	Safe Space (rest, recharge phones, eat food, clothes closet, use the bathroom); day program (to-go meals, bathrooms, warm place to rest and regroup daily); NA and AA	Residential-Professional District (transition between residential and commercial that provides for a mixture of residential and professional office uses).
Calvary Luther Church	On-site pastoral counselling	Residential R-4 (high density residential)

EXHIBIT D

OZARKS

New church in north Springfield partners with Gathering Friends to serve poor, homeless



Jackie Rehwald

News-Leader

Published 10:25 p.m. CT July 21, 2019 | Updated 10:14 a.m. CT July 22, 2019

Some might think the old strip mall — which used to contain a bar and a barber shop — at the corner of Commercial Street and National Avenue is an unusual place for a church.

But to Pastor Christie Love, it was the perfect location for the Connecting Grounds, an interdenominational church planted last September devoted to helping those in poverty.

"God has developed a huge heart in me for north Springfield," Love said. "I was on staff at another church and really felt a tug that we needed a different kind of church that was meeting some of the practical needs of our community in north Springfield."

Meeting those "practical needs" includes offering a low-barrier food and clothing pantry to anyone in need (no matter where they live or if they have a home), offering a safe place for foster kids and their biological parents to visit with each other, serving dinner and fellowship to those living in the neighborhood and creating a welcoming place for homeless folks who might need a drink of water or to rest on a couch for a little while.

When Love and her team at Connecting Grounds learned that Gathering Friends, a group of volunteers who help the homeless, was looking for a new place to serve dinner to homeless people on Tuesday nights, they reached out.

"We had a conversation with them very early just to say, 'Let us know what we can do. I think our heart is for the same people,'" Love said. "We are helping a lot of the same people."

The resulting partnership launched Tuesday evening when about 75 homeless people, as well as people from the neighborhood, were given sack meals from Gathering Friends volunteers.

Each bag contained a peanut butter and jelly sandwich, cucumber slices, bananas, chips, granola bar, cupcake and soda or water.

The meals were handed out in the parking lot, but people were welcome to eat inside the air-conditioned church.

Another 60 bags were handed out to homeless people who came to Grace United Methodist Church in downtown Springfield, where Gathering Friends has been providing a Tuesday night meals for some time.

Gathering Friends co-founder Jennifer Cannon said the switch to Connecting Grounds will allow the volunteers to help a "more diverse audience that was underserved, while still serving our unsheltered friends."

Cannon said they will hand out sack meals at Grace United one more week, in an effort to let the homeless people know the Tuesday night outreach has moved.

'This is why we are here'

The two organizations — Connecting Grounds and Gathering Friends — have been working together for a few months.

In March, the Gathering Friends left the Veterans Coming Home Center, their longtime meal serving spot. Instead of serving breakfast and lunch at that homeless drop-in center, Gathering Friends began collecting food for the Connecting Grounds food pantry.

Cannon said she felt Tuesday night's meal service went great. They served more people than they expected, Cannon said, and "really enjoyed meeting new people."

"Each time we are in a location with new people we are just overwhelmed by how great the need is," Cannon said "You could seriously pop up anywhere north of Sunshine with cold water and sandwiches and have appreciative people wait in the hot sun to accept and appreciate your food."

Connecting Grounds Pastor Love stood a few feet away and watched the line of people make their way to the table to be given a bag of food.

"I love it. This makes my heart really happy," she said, smiling. "This is why we are here."

Gathering Friends will continue to serve sack meals at 5 p.m. Tuesday from the parking lot at Connecting Grounds, 1109 E. Commercial St.

The group also serves breakfast on Tuesday and Thursday mornings for the men at Victory Square and on select nights at Franciscan Villa. Learn more about how to get involved by following the Gathering Friends' Facebook page.

'You get to shop and act normal'

With the Gathering Friends' Tuesday night meal being moved to Connecting Grounds, the ladies who stay at Safe to Sleep will now catch their bus to the shelter at the church on Tuesdays.

For that reason, many of those women made their way to the Commercial Street church before the meal was served earlier this week.

Since Kyla's Closet (the clothing bank) was open, most of the women perused the racks looking for clothes.

Cherice Evans, 46, was among them. She said she's been staying at Safe to Sleep, an overnight shelter for homeless women, for a few months.

When she was done picking out clothes, Evans sat outside in the shade and talked about being homeless in Springfield.

"These people are forced to walk so many miles, and they are just tired," Evans said, motioning to the homeless people around her.

Evans expressed frustration at not being welcome inside area businesses.

"You can't get a drink, can't use the bathroom," she said, starting to cry. "If you go to the library, you are not allowed to sleep. I found that out today."

"Here, they are really hard on the homeless," Evans said.

Still, Evans said she appreciated what Connecting Grounds and Gathering Friends are doing for the homeless. She said she enjoyed picking out fresh clothes in Kyla's Closet.

"You get to act like you're normal," Evan said. "You get to shop and act normal."

Kyla's Closet used to be a thrift store/clothing bank started by a woman named Jody Rice. Rice named the store after her daughter, Kyla, who died.

"Jody wanted to be able to help single moms," Love explained. "Kyla had a huge heart for helping people."

But the thrift store operation grew. And grew.

"Jody's heart was really to help people more than to be in business," Love said. "Someone introduced the two of us. And I said, 'We have a bunch of empty space we are not using right now.' So we ended up bringing the entire store down here."

Kayla's Closet is not a thrift store anymore; the clothes are free.

People can fill up a bag of clothes once a month.

'The need is completely overwhelming'

As for the Connecting Grounds' food pantry, people can get food bags twice a month.

The food pantry has fewer requirements than most traditional food pantries, which makes it easier for a homeless person or for someone who doesn't live in Greene County to get food. But that also means it is not eligible to receive food from a food bank, like Ozarks Food Harvest.

"We are totally dependent on businesses and people to do food drives," Love said, "because the need is completely overwhelming."

The Connecting Grounds offers two different types of food bags. There is a "cooking bag" for those who have a home and electricity.

"They have the capacity to cook things so sometimes that is stuff to make spaghetti, Hamburger Helper, stuff to make tacos," she said.

"Whereas our homeless friends, we do snack bags," Love continued. "Those are all ready-to-eat food, things more like beef jerky or pop-top pastas, peanut butter crackers, protein bars, bottles of water."

In the six months Connecting Grounds has been open, 800 families have been served there, Love said.

Donations of food and gently-used clothes and shoes can be dropped off during these times:

Tuesday 9-11 a.m. and 2-6 p.m.

Thursday 2-8 p.m.

Friday 3-8 p.m.

Sunday 8-9 a.m. and 11:30 a.m.-noon

Connecting Ground also has a program called Family Connection, in which the church opens up to allow foster children visit with their biological family.

Games, activities, books and crafts are available to families to use during their time together.

If a child has a birthday, Love said they throw a little party with cake and decorations.

'It just needs a little bit of love'

Love is part of the Child Abuse and Neglect Collaborative through Community Partnership of the Ozarks.

"We are in the process of recruiting other churches to join with us in this program," she said.

"Our goal is to have a south-side church, an east-side church, a west-side church and a central church that we can train this fall."

Love said she has been amazed at how the church has grown and how well-received it's been in the neighborhood.

From the first day they began cleaning the buildings, Love said folks from the neighborhood would come over and ask what was going on.

"We would say, 'We are opening a church,'" Love said. "Every single person has been like, 'Oh my gosh, thank you, thank you, thank you.'"

Love said it breaks her heart when someone suggests she planted the church in a "scary part of town."

"I'm like, 'No, it's a beautiful part of town," she said. "It just needs a little bit of love."

Learn more about Connecting Grounds at theconnectinggrounds.com.

Connecting Grounds has a traditional church service twice a week: 9:30 a.m. Sundays and 6:30 p.m. Tuesdays.

EXHIBIT E

Get Involved

“Not all of us can do great things. But we can do small things with great love.” Mother Teresa

To fill the gaps in our community and meet the needs of our neighbors in need- it takes all of us coming together in love to find the ways that we can help to bring about positive change. Below are many of the ways that you can get involved and help us **love out loud** and make Springfield a better place for all who call it home:

Street Outreach. At The Connecting Grounds (TCG), we have two seasons of street outreach.

In the winter, we have two outreach teams out every night when it is colder than 40 degrees. We go around in our vans loaded with supplies and check on people, give out survival supplies, talk to people about shelter options, and give rides to a shelter if beds open.

In the summer, we have teams out during the day between 1 PM-3 PM when it is hotter than 95 degrees. We drive around and hand out cold water, Gatorade, ice packs, cooling towels, sunscreen, popsicles, and aloe to help vulnerable individuals cool off on hot days.

CONNECT TO OUR STREET TEAM COMMUNICATION PLATFORM

Volunteer at The Community Outreach

Center. Located at 3000 W. Chestnut Expressway, our Outreach Center is open 9 AM - 1 PM Tuesdays, Thursdays, and Saturdays. It offers a clothing closet, computer lab, survival supplies, food pantry, medical clinic, haircuts, and more.

Our most significant needs for community volunteers at this time are to work our check-in process, and welcome desk, help in our computer lab, and provide haircuts to guests to sign up for these roles, click the button below.

EMAIL US TO START VOLUNTEERING AT THE OUTREACH CENTER

Medical Volunteering. We have a first aid and wound care clinic at our Outreach Center, and we are always in need of people with medical training to come and help us care for the minor health issues that guests might

be having as well as help them navigate the healthcare system for help with larger issues.

JOIN OUR BAND GROUP FOR MEDICAL VOLUNTEERS

Like to prepare for food for groups of people? We have several different regular meal needs at The Outreach Center and in the Community where we need meals prepare.

OUTREACH CENTER BREAKFAST

PROVIDE DINNER TO OUR NIGHTLY SHELTER GUESTS

FRIDAY NIGHT OUTREACH MEALS

Want to work with families? We run a Family Connection program all year long that supervises visits for kids in the foster care system with their parents. Volunteers in this program get the chance to build strong relationships with kids and parents who are separated and support them as they work to reunify. We also work with other churches to train them to bring this program to their churches.

LEARN MORE ABOUT FAMILY CONNECTION AND GET INVOLVED

Transportation. There is always a HUGE need for people willing to help drive individuals to appointments, court dates, and sometimes back to family out of the area.

YOU CAN JOIN THE TRANSPORTATION TEAM BY CLICKING HERE

Join our TCG Pet Fostering Team. Sometimes, our friends on the street need to have their pets fostered to help them access resources, programs, and other ways to overcome barriers or address medical needs. If you are interested in helping to love on some very sweet dogs or cats from time to time.

TO JOIN OUR FOSTER PETS FB GROUP, CLICK HERE

TCG Volunteers FB Group. We use this FB group to share unique volunteer needs. Be sure to join it to stay connected and learn about future needs.

TO JOIN THIS GROUP, CLICK HERE

Donate new or gently used items that can be used by our neighbors in need. Donations can be dropped off at 3000 W. Chestnut Expressway on Tuesdays/Thursdays/Saturdays between 9 AM-1PM. We take donations of survival supplies, clothing (not dress clothing), tennis shoes, medical supplies, food, and more.

[VIEW OUR GREATEST DONATION NEEDS](#)

Shop our current Amazon Needs lists to help provide food and supplies for street outreach, medical outreach, and the Outreach Center.

[AMAZON LIST FOR OUTREACH SUPPLIES](#)

[AMAZON LIST FOR FOOD PANTRY](#)

[AMAZON LIST FOR MEDICAL SUPPLIES](#)

Donate to the TCG Outreach Fund: This fund helps to meet needs and fill gaps. 100% of the money given to this fund are used for outreach purposes for things such as; prescriptions, eye glasses, supplies, housing

fees, vital documents, gas cards, hotels and much more!

GIVE TO THE OUTREACH FUND

In addition to these ways to volunteer through The Connecting Grounds and Crisis Cold Weather Shelters, other great organizations that need help:

Youth Connect Center- that serves homeless teens between 13-18.

O'Riley Center for Hope

Gathering Friends

Eden Village

Harmony House

We hope you each find a way to connect to an ongoing volunteer opportunity to help us bring about positive change in our community.

Find Us:



Our Church

Location (Mailing Address):

4341 West
Chestnut
Expressway

Our Family

Connection Center:

4347 West
Chestnut
Expressway

Our Community

Outreach Center:

3000 West
Chestnut
Expressway

Sign up for for our Newsletter!

Sign up with your
email address to
receive news and
updates.



CONTACT US

SIGN UP

We respect your privacy.

LOVE OUT LOUD STORE

PARTNERSHIP REQUEST FORM

EXHIBIT F



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Search

Join us in promoting justice for all people.

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Do you need legal help?
The first step is to schedule

an intake appointment:

SCHEDULE AN INTAKE



We are
excited to
welcome
you!

Our main office* in
Indianapolis is open:

- Monday-Thursday,
9am-3pm
- Friday, 9am-12pm

You can also reach us
by phone at **317-429-
4131** Monday-Friday,
9am-5pm.

If you are seeking legal help, please **first** schedule an intake appointment with us here.

*Please note: Some of our services (e.g. expungement and eviction assistance) are offered at locations separate from our main office. Visit our intake page to learn more.

Do justice. Love mercy.
Walk humbly.

- MICAH 6:8 (abridged)



About Us

Neighborhood Christian Legal Clinic believes everyone should have access to justice regardless of their income, so we provide free legal services to those who cannot afford them. We're a faith-based organization that seeks to show God's heart for justice by serving and empowering all clients, regardless of background or religion. Our goal is to free our clients from the legal burdens that have kept them from flourishing. The Clinic's main office is in Indianapolis, but we also provide services statewide.

Vision

Justice for the vulnerable so that all may flourish.



DID YOU KNOW?

Every dollar you invest in
civil legal services returns

\$6.70.

Source:
The Indiana Lawyer

Mission

To promote justice through legal representation and legal education for our low-income neighbors as a way of demonstrating Christ's love.

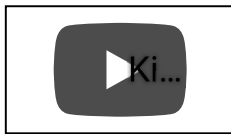
Clinic news—right to your inbox!

Sign Up for Monthly eNews

For Email Marketing you can trust.

Legal Services Transform Lives

Client Story Videos



Hearts for Justice Blog



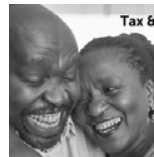
May 31, 2023
A Clinic Volunteer Story



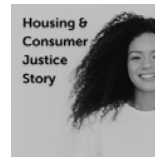
May 30, 2023
Client Story: Immigration Hope after Fleeing Persecution



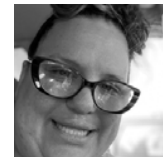
May 29, 2023
Memorial Day Spotlight: Helping Veterans in Need



May 28, 2023
Client Story: Tax Justice for Hard-Working Refugees



May 27, 2023
Client Story: Justice When Wages are Wrongfully Taken



May 26, 2023
Re-Entry Justice Story: A Clean Start

The Clinic does not discriminate in the delivery of services or benefits based on race, color, national origin, religion, sex, disability, age, sexual orientation, or gender identity.

Events

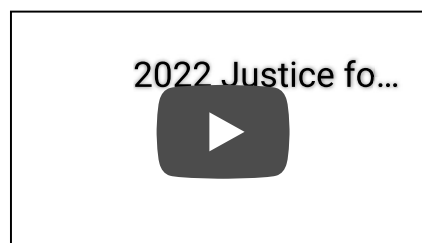
Upcoming



Justice for All
Celebration

5:30 PM – 8:30 PM

Past



Preventive Legal Education

We periodically go LIVE on Facebook with new content covering a variety of legal issues our neighbors may face. Topics include landlord/tenant issues and eviction, immigration and survivor justice, tax, and more. Follow us on **Facebook (@NCLegalClinic)** to be notified when we go LIVE, or find past videos by clicking the button below:

Legal Help Online:

We are temporarily pausing our Legal Help Online program in order to update our website and processes. Please check back later.



3333 N Meridian Street, Suite 201, Indianapolis,
Indiana 46208



EXHIBIT G



The **FAME Legal Clinic** provides services to thousands of low-income residents in the greater Los Angeles area on a non-discriminatory basis. Since we opened our doors in 1993, our mission is to improve public confidence in our legal system by delivering free legal services, referrals to government agencies, mediation services and referrals to other fee and non-fee legal service providers. Consultation dates are as follows:

January 8, 22	February 5, 26
---------------	----------------

March 5, 19	April 2, 23
May 7, 21	June 11, 25
July 9, 23	August 6, 20
September 10, 24	October 15, 29
November 5, 19	December 3, 17

Our staff of dedicated volunteer attorneys, paralegals and law students provides services in the following areas:

- Bankruptcy
- Child Custody
- Criminal/Expungement
- Divorce
- Employment
- Landlord & Tenant Disputes
- Personal Injury/Work Injury
- Probate
- Real Estate
- Social Security

The Legal Clinic, a collaboration between the First AME Church (FAME), the Temple Isaiah, Public Counsel and the

UCLA School of Law, is supported by the State Bar of California, the Los Angeles County Bar Foundation and several other prestigious local Bar Associations. Our paralegals and law students come from preeminent law schools in Los Angeles such as: USC, UCLA, Loyola, Southwestern, Pepperdine and Southwest College. Note: The FAME Legal clinic DOES NOT represent clients.

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[Click here to register for Legal Clinic!!](#)

FREE LEGAL CONSULTATION

Volunteers are available to help you with legal issues



FAME LEGAL CLINIC

Sundays 10 a.m. - 1 p.m.

Consultation Dates:

January 8, 22	July 9, 23
February 5, 26	August 6, 20
March 5, 19	September 10, 24
April 2, 23	October 15, 29
May 7, 21	November 5, 19
June 11, 25	December 3, 17

Our staff of dedicated volunteer attorneys, paralegals and law students provide services in:

- Family Law
- Criminal/Expungement
- Landlord/Tenant Disputes
- Veterans Benefits
- Wills/Trusts/Probate/Estate
- Bankruptcy
- Employment
- and more

TO REQUEST ASSISTANCE VISIT:

www.famechurchla.org/free-legal-clinic/



TENPLE
ISAIAH



FAME Renaissance Center | 1968 W. Adams Blvd. | 323-643-1675

EXHIBIT H

Document title: Immigration Legal Services - Catholic Charities of Oregon

Capture URL: <https://www.catholiccharitiesoregon.org/services/immigration-legal-services/>

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Operating system: Windows_NT (Node 16.17.1)

PDF length: 6

Capture ID: 9tD3PqtMq2cMQfbPLMYhXT

User: sr-dhall



SERVICES > IMMIGRATION LEGAL SERVICES

IMMIGRATION LEGAL SERVICES

Founded in 1996, our Immigration Legal Services division works to protect individuals and maintain and reunify families in need.



CONTACT US

If you need immigration legal assistance, please reach out to us.

P. (503) 542-2855

E. ILS-INTAKES@CCOREGON.ORG

[CONTACT](#) →

VOLUNTEER OPPORTUNITIES

[LEARN MORE](#) ↗

DONATE TO: IMMIGRATION LEGAL SERVICES

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WORKING TO KEEP FAMILIES TOGETHER

Catholic Charities' Immigration Legal Services (ILS) program is a nonprofit law program providing low-cost consultations and legal representation to immigrants and refugees throughout Oregon and southwest Washington. We also educate the public, immigrant communities, and the organizations who serve them to promote justice for all newcomers and support conditions for their full participation in American society.

We focus on family reunification and assistance to the most vulnerable immigrants and refugees, including survivors of domestic violence, and sexual assault.

"It is necessary to respond to the globalization of migration with the globalization of charity and cooperation, in such a way to make the conditions for migrants more humane."

— Pope Francis





OUR SERVICES

- Family-based applications/visas
- Permanent residency (Green Card)
- Naturalization and citizenship
- Deferred Action for Childhood Arrivals (DACA)
- Survivors of domestic violence, sexual assault, and child sexual abuse (VAWA)
- Visa for crime victims (U-Visa)
- Temporary Protected Status (TPS)
- Asylum
- Removal Defense
- Refugee adjustment of status/family petition

We also offer other types of assistance on a case-by-case basis.

Clients enrolled with ILS should contact their representative to make an appointment. Walk-in appointments will not be accepted.

WHOM WE SERVE

ILS provides help to clients with diverse backgrounds and varied needs:

- Families that have been separated
- Survivors of domestic violence, stalking, and other violent crimes ([learn more](#))
- Refugees
- Dreamers (DACA)
- Foreign-born spouses or children of U.S. citizens
- Immigrants without criminal offenses who face deportation/removal
- Low-income individuals and families seeking documentation

- Foreign-born spouses of children of U.S. citizens
- Immigrants without criminal offenses who face deportation/removal
- Low-income individuals and families seeking documentation

CENTER FOR REMOVAL DEFENSE

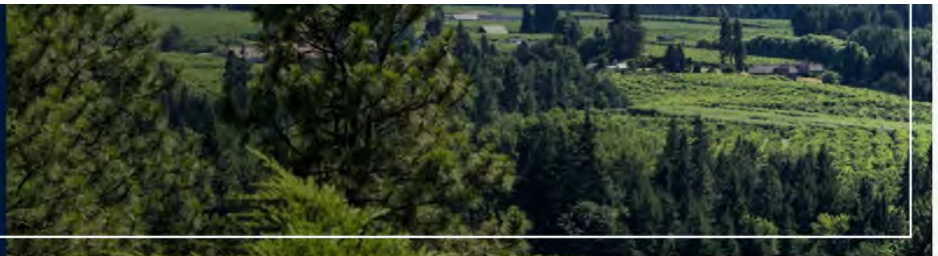
In conjunction with our ILS team, the Center for Removal Defense provides high-quality immigration legal services to low-income immigrants and refugees and engages in public education, training, and community outreach to foster migration-positive communities and full participation of all newcomers.

[VIEW SERVICE →](#)

RURAL COMMUNITIES PROGRAM

We provide free immigration legal services for survivors of domestic violence, dating violence, sexual assault, and stalking in rural Oregon.

[VIEW SERVICE →](#)

[VIEW SERVICE →](#)


FEB 24, 2023

LAW STUDENTS HELP WITH LEARNING

ARTICLES

IMMIGRATION LEGAL SERVICES

JUN 29, 2021

AFTER 42 YEARS OF SERVICE, IMMIGRATION LEGAL SERVICES STAFF MEMBER RETIRES

MAR 17, 2021

ACUTE NEED FOR ASSISTANCE CONTINUES AMID OREGON WILDFIRE AFTERMATH

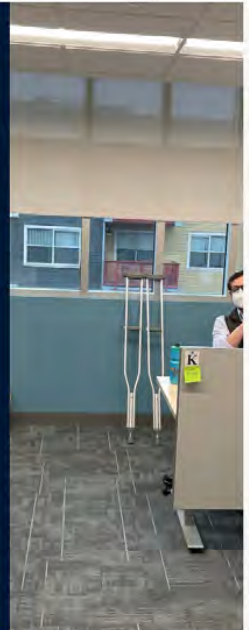
JAN 12, 2021

POLÍTICA DE INMIGRACIÓN DURANTE LA TRANSICIÓN DE LA ADMINISTRACIÓN PRESIDENCIAL

FEB 24, 2023

LAW STUDENTS HELP WITH LEARNING

Students from local law schools who volunteer with Catholic Charities of Oregon Immigration Legal Services assist immigrants, asylees, refugees, recent arrivals from Afghanistan, and survivors of serious crimes, all while learning from the agency's immigration lawyers. Students can earn school credit through an externship under the supervision of a Catholic Charities attorney or serve as interns....

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[OUR CATHOLIC IDENTITY](#)
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Catholic Charities

PROVIDING HELP CREATING HOPE



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SERVICES

FEB 24, 2023

LAW STUDENTS HELP WITH LEARNING

ARTICLES

IMMIGRATION LEGAL SERVICES

FEB 24, 2023

LAW STUDENTS HELP WITH LEARNING

Students from local law schools who volunteer with Catholic Charities of Oregon Immigration Legal Services assist immigrants, asylees, refugees, recent arrivals from Afghanistan, and survivors of serious crimes, all while learning from the agency's immigration lawyers. Students can earn school credit through an externship under the supervision of a Catholic Charities attorney or serve as interns....

[READ MORE →](#)

JUN 29, 2021

AFTER 42 YEARS OF SERVICE, IMMIGRATION LEGAL SERVICES STAFF MEMBER RETIRES

MAR 17, 2021

ACUTE NEED FOR ASSISTANCE CONTINUES AMID OREGON WILDFIRE AFTERMATH

JAN 12, 2021

POLÍTICA DE INMIGRACIÓN DURANTE LA TRANSICIÓN DE LA ADMINISTRACIÓN PRESIDENCIAL



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[BOARD AND COMMITTEE
OPPORTUNITIES](#)

[OUR VALUES](#)

[OUR IMPACT](#)

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SERVICES

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EXHIBIT I



We are united to meet the needs in our local community with the compassion of a loving God. Our vision is to help others feel that they **BELONG** by bringing them into our open doors to meet a physical, spiritual, relational, or emotional need. Through this step, we want to lead them to **BELIEVE** in the one true God and **BECOME** mature Christ-followers who will share their stories with others.

The Community Care ministry is made up of a three-pronged approach:

- **Food:** BNaz and Brookings-Harbor Food Project
- **Finance:** Community Care Fund (including the Love Fund)
- **Family:** Other long-term partnerships with families from a guidance/counseling basis - (spiritual, financial, relational, and emotional needs)



Monday		<u>St Timothy's Church</u>	11-12
Tuesday		<u>Lutheran Church</u>	12-1
Wednesday		<u>Catholic Church</u>	12-1
Thursday		<u>Presbyterian Church</u>	12-1
Friday		<u>St Timothy's Church</u>	12-1
Saturday	1st, 3rd or 5th	<u>St Timothy's Church</u>	12-1
	2nd or 4th	Brookings Church of the	
Nazarene	12-1		
Sunday		<u>St Timothy's Church</u>	3:30-
4:30 PM			

Weekend Service Times

Join us in-person or online
Saturdays at 6:00 p.m.
and Sundays at 10:30 a.m.

Location

Street Address:
1600 Chetco Avenue
Brookings, OR 97415

Mailing Address:
PO Box 6519
Brookings, OR 97415



WATCH LIVE

WATCH PAST SERMONS

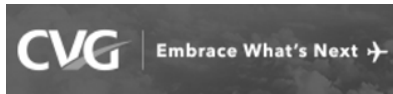


[HOME](#) [LOGIN](#)

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541-469-2571



EXHIBIT K



Business	Education	Government	Health	Living	News	NonProfit	Region/State	Sports	Voices	
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Home News Ticker Madison Avenue Christian Church continues its community ministry during crisis, including meals

Madison Avenue Christian Church continues its community ministry during crisis, including meals

Apr 7th, 2020 · 0 Comment

For sixteen years, Madison Avenue Christian Church (MACC) has quietly been providing meals for the homeless and poor through its community ministry programs. That effort has not stopped, despite the mandate for reduced crowd sizes during the COVID-19 crisis, but now the meals are served in a brown bag and distributed in the church parking lot. Allowing for social distancing and safe food handling, volunteers are bagging sandwiches and using gloves when handling the food bags.

"These are challenging times but it doesn't change the fact that people need help and they are hungry," said Madison Avenue Christian Church Reverend Simon. "Our volunteers, many of whom have been with us for years, are struggling to purchase the meats and sandwich items needed to fill the bags, they are making several trips to grocery stores to buy enough food. We are doing everything within our power to keep feeding the people who have nowhere else to go for a meal."

Utilizing the food preparation guidelines set forth by the Northern Kentucky Health Department, the church is serving about 125 meals each Monday and Wednesday evening and the numbers are growing. Like many churches in the region, Madison Avenue Christian Church is streaming live on Facebook their Sunday worship services at 10:45 a.m.

Working with several hundred volunteers each year, the church provides two community meals each week, serving approximately 200 guests at each meal. On the first Saturday of each month, church members collaborate with First Christian Church in Covington to provide evening meals. The quarterly Samaritan Car Care program provides oil changes and minor car repairs for low-income individuals who need help maintaining their automobile. Next door to the church is a transitional residence that is sponsored by the church, providing shelter and services to a family in need.

In addition to serving the community, MACC has put a great deal of effort into beautification of the church grounds, facilities and cherished stained-glass windows, providing beauty and a sense of community for the residents in the surrounding neighborhoods.

A Disciples of Christ affiliated church, Madison Avenue Christian Church has an over 100-year commitment to the citizens of Covington, currently hosting a robust community meal program for those in need and sponsoring a Samaritan Car Care program that assists women with families who are unable to afford the cost of routine maintenance and minor repairs to their cars. The church has provided medical programs in conjunction with NKU nurses and registered individuals for the Affordable Care Act. Dedicated church members and hundreds of community volunteers serve on average, 15-20,000 hot meals a year, and over 275,000 meals have been served since the beginning of the program in 2004.

To learn more, the website.



Archives

Select Month



Sign up for
NKYTribune News Updates



**Our neighbors are struggling to
put food on the table.**

**HUNGRY TO HELP? Give online at
www.svdpnky.org. THANK YOU!**

Related Posts



Madison Avenue Christian Church, NKU to host community health fair March 27 in Covington

03/9/2023 · 0 Comment



Cats Honor past, earn first sweep of volunteers in over a decade with 66-54 victory Saturday at Rupp

02/19/2023 · 0 Comment



Kentucky Arts Council seeking volunteers March 9-12 for 2023 Kentucky Crafted Market in Lexington

01/19/2023 · 0 Comment

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CAN SUPPORT OUR
UNCOMMON COMMUNITY



learning grove



75 Orphanage Rd.
Fort Mitchell, KY
41017
859-331-2040
DCCHcenter.org

Who we are and what we do:

- ♦ **Our Mission and History:**

Our Mission: To express God's love by providing compassionate care and quality services to address the physical, spiritual and emotional needs of children and families.

For over 160 years, DCCH Center for Children and Families has served the needs of more than 3000 children in Northern Kentucky, as a faith-based, non-profit agency.

- ◊ Residential Facility
- ◊ Foster Care and Adoption
- ◊ Independent Adoption
- ◊ Outpatient Therapy Center



How you can help:

- ♦ **Volunteers:** Many volunteer opportunities are available, including mentoring children, volunteering at special events, serving as classroom aids at Guardian Angel School, providing childcare for our foster parents, and more.
- ♦ **Foster:** Over 300 children are in need of a placement each month.
- ♦ **Adopt:** Give a child and yourself a "forever family".
- ♦ **CONTACT:** Sarah McAdams at SMcAdams@dcchcenter.org for more information.



#Changealife
DCCHcenter.org



Affiliations

- Institute for Nonprofit News
- Online News Association
- N. Ky. Chamber of Commerce
- Covington Business Council

EXHIBIT J



BROOKINGS-HARBOR SCHOOL DISTRICT

Search this site 

[Schools and Programs](#) » School Based Health Center - Coast Community Health

School Based Health Center - Coast Community Health



STUDENT HEALTH CENTER

Brookings Harbor School District

Planned opening November 2022 – Location: CCH trailer in high school parking area.

Please return the optional registration forms to your school office.

[Calendar](#)

[Staff Directory](#)

[Directions](#)

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What is a School-Based Student Health Center?

A School-Based Health Center is much more than the traditional school nurse's office. It is a medical facility located in the school that offers many health and medical services like your doctor's office (see list below). We do not replace your primary doctor, and all of our services are provided at one of the participating schools. The Student Health Centers are operated by Coast Community Health Center through an agreement with Brookings Harbor School District.

Who works at the Student Health Center?

Our staff includes Family Nurse Practitioners (FNP), who can treat most health problems and prescribe medications, registered nurse (RN), medical assistants (MA), and support staff. Mental health counseling and/or referrals to mental health/drug and alcohol services are also available. All staff are supervised by and have support of the Coast Community Health Center physicians and Chief Medical Officer.

What services are offered?

We can take care of most of your student's health care needs. If there is an emergency or service we do not provide, we contact 911 or will make a referral to another health care provider. When the health center is not open or staff is unavailable, school personnel will follow school guidelines for all emergency situations.

- ❖ Wellness and how to maintain it for a lifetime
 - ❖ Physical examinations, routine, and sports
 - ❖ Mental health services and counseling
 - ❖ Referrals to other health care providers
 - ❖ Immunizations and flu shot
 - ❖ Assessment of health strengths and challenges
- ❖ Nutrition education and weight management
 - ❖ Diagnosis and treatment of minor illness
 - ❖ Dental screening
 - ❖ Vision and blood pressure screening
 - ❖ Tests such as anemia, diabetes, and infection

What about costs and billing?

Coast Community School Based Health Center wants to provide health care for all students who need it. Many of our services are provided at no charge; however, there are some services that we provide that require an exam and medical action that **may** result in a charge. No student will be turned away due to inability to pay. Examples of some of these services include:

	Sore Throat	Pink eye	
	Ear pain	Abdominal pain	
	Cough	Foreign body in eye	
Calendar	UTI symptoms	Follow up visits	Board
	Staff Directory	Directions	

Sprain/fracture
Head injury

Well Child checks
Immunizations

If a visit does result in a charge, we will bill your insurance for you, including the Oregon Health Plan. We also offer a sliding discount program which is based on your family size and income. Anyone can apply for this program even if you have insurance. We encourage all families to complete an application. An office visit summary will be sent home after a billable service is provided.

What about parental consent?

At the health center we require parental/guardian signed consent for a student to use our services.

*We support and encourage parental involvement in decisions about your student's health care.

What about confidentiality?

Our health services and records are private and confidential. Health records will not become a part of your student's school record and will only be used by health center staff unless you give us written permission to share information.

Like other health care providers, the Student Health Center follows the guidelines of the Health Insurance Portability and Accountability Act of 1996 (HIPAA). HIPAA regulates how medical information may be used and disclosed and how you can get access to this information. We are required to give you a copy of our Notice of Privacy Practices and have you sign the Acknowledgment and Consent which is included in the packet.

Students will be encouraged to discuss visits with their parents; however, confidentiality will be provided at the student's request. Oregon State Law (ORS 109.610, ORS 109.640, and ORS 109.675) requires strict confidentiality regarding evaluation, diagnosis and/or treatment for sexually transmitted diseases, sexuality issues, pregnancy testing or mental health services.

What about appointments?

Appointments are encouraged whenever possible. A parent may call and make an appointment, or your student is welcome to come by and schedule an appointment. Hours will be posted on the clinic door and in the school bulletin.

Información en español - CENTRO DE SALUD ESTUDIANTIL BROOKINGS-HARBOR SCHOOL DISTRICT



[English v2 BHSD SBHC Registration Forms](#)

[Spanish v2 BHSD SBHC Registration Forms](#)

[Calendar](#)

[Staff Directory](#)

[Directions](#)

[Board](#)



School Based Health Center trailer - Located in the gated parking area of Brookings-Harbor High School.

[Calendar](#)

[Staff Directory](#)

[Directions](#)

[Board](#)

EXHIBIT L

(541) 469-3411



Trinity Lutheran Church

SITE CONTENT

Quilters

You don't need to know how to quilt to be of help. Join our friendly group at 10 am Wednesdays, following the Lutheran Hour, for a "tack & tie" session. Donations of cotton fabric are appreciated. All quilts are donated to Lutheran World Relief.
Sewers needed!

Evangelism & Missions Committee

All members are welcome to attend meetings of this outreach committee, a friendly group who pray for and work for the mission of the church. Contact Roger Cox for more information.

Donations Needed This Month

Brookings-Harbor Food Bank - Baking Mix (only commercially canned items accepted)

Check out the donation baskets under the TV in the Narthex - Campbell's soup labels, stamps, and other items

Community Kitchen

Fridays from Noon to 1 pm at TLC.

TLC joins with 5 other local churches to provide the hungry with a daily meal. Everyone is invited; donation is optional. Volunteers to help are always welcome.

BASIC CARE ITEMS NEEDED

- Toothbrushes & travel sized toothpaste
- Non-alcohol mouthwash
- Travel size shampoo
- Disposable razors & shaving cream
- Soap, washcloths & deodorant
- Band-aids, Wet Wipes
- Socks, Rain Ponchos
- Dry dog food

OPTIONAL ITEMS

- AAA Batteries, Flashlights
- Small soap containers, Sewing Kits
- Headband lights

All items must be new and unopened. Place in marked bin under the monitor in the Narthex.

Other Ministries We Support

- Lutheran World Relief
- Hope for the Children of Haiti Orphanage
- Oasis Shelter Home
- Gideons International
- Samaritan's Purse Operation Christmas Child

- Brookings Community Welfare Fund
- Brookings Pregnancy Care Center
- Brookings Harbor Food Bank - see "Donations" above
- AFLC Missionaries
- Lutheran Bible Translators
- Needs of local children through the SMART readers program and winter clothing appeal

CONNECT WITH US



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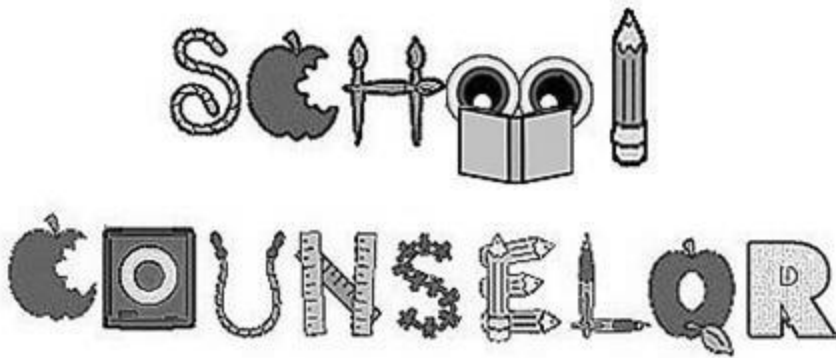
EXHIBIT M



MILL STREET ELEMENTARY
LEWISVILLE INDEPENDENT SCHOOL DISTRICT



COUNSELING



What does an elementary counselor do?

- School counselors serve ALL the students at a school and help them be their best
- Facilitating classroom "Life Skills" lessons aligned with state standards in each classroom

- Organizing school-wide service learning projects and special events as applications of our character education program
- Consulting with parents, teachers, and administrators
- Providing materials to teachers and parents on topics related to the guidance and counseling standards when needed
- Connecting families with school and community resources
- Talking with students who have a problem they'd like help solving or have something on their mind they'd like to talk about
- Visiting with students who could use care and support from an extra adult
- Counseling students in small groups built around shared needs like divorce/changing families, grief, anger management, ect.
- Counseling students individually
- Teaching social skills and coping skills

A Developmental Guidance Program provides services for all students through individual counseling, small group counseling, and classroom instruction.



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MILL STREET ELEMENTARY



601 S Mill Street - Lewisville, TX 75057



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EXHIBIT N

REYNOLDS

High School

Search

Our Schools » Reynolds High School » Academics » College and Career Center

College and Career Center



The RHS College and Career Center (CCC) is available to RHS students in every grade level. Students interested in exploring their post-high options can email Shannon Selby, *RHS College & Career Coordinator*, for an appointment. Classroom teachers can also schedule tours and presentations on a variety of topics.

The primary goal of the CCC is to spark students' interests and engage them in planning for life after high school. Students who visit the CCC can find the latest information about exploring colleges and universities, college and university admissions, college applications, financial aid (FAFSA/ORSA), scholarships and grants, Oregon Promise, community service, volunteer opportunities, Naviance, and much, much more!

All RHS students are encouraged to check out the vast array of resources the CCC has to offer. Students should visit the CCC early and often throughout their high school careers, as waiting until senior year to start investigating post-high options can be extremely stressful! Students can seek assistance and support in post-high exploration and planning to achieve bright futures based on their individual ambitions, goals, talents and dreams.

Questions? Contact Shannon Selby, *RHS College & Career Coordinator*

RHS College & Career Center hours:

Contact Us

Open to all RHS students on school days; closed on non-school days, grading days, conferences & break

Monday-Friday 8:00 AM-4:30 P

Join the **RHS College & Career Center Schoology** group
Access Code: PR7X-C

Schoology group: **Class of 2023 Counseling** Access Code:



Co



Financial Aid & Paying for Co



Naviance-Your One Stop Shop for College & Career Exploration



Scholarships & Grants

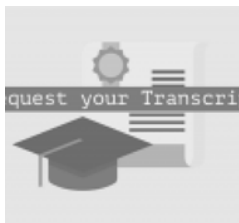
Contact Us



Community Service & Volunteer





Military & JROTC



Request your HS Transcript

Supporting Documents

-  Orientation to the RHS College & Career Center (Fall 2022) (4 MB)
-  GR 12 College Planning Checklist (141 KB)

Upcoming Events

Board Meeting

06/28/2023 - 7:00pm

Online Athletic Clearance Opens

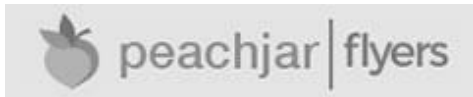
07/03/2023 - 8:00am

Independence Day

07/04/2023 (All day)

Contact Us

View Calendar



[Home](#) | [Website Login](#) | [Careers](#) | [Non-discrimination & Equi](#)

1698 SW Cherry Park Road, Troutdale, OR
(503) 667-3186

a municode design



Contact Us

EXHIBIT O

CLOTHES FOR KIDS



Clothes *for* kids

from a community that cares

Clothes for Kids is a district-run, volunteer-supported program that provides free clothing for students (grades K-12) from families with limited income.

Students can visit Clothes for Kids two times per school year.

To schedule an appointment, please use the ParentSquare login button or call 503-356-4322. Appointments are per family, not per student. During the 45-minute appointment, there's a limit of one adult with up to four children or two adults with 5 or more children.

ParentSquare Login (<https://www.parentsquare.com>)

LOCATION

16550 SW Merlo Road

HOURS

Tuesdays: 9:30 a.m. - 3 p.m.
Wednesdays: 9:30 a.m. - 6 p.m.
Thursdays: 9:30 a.m. - 3 p.m.

Donation Bins are available
Monday-Friday
8 a.m. to 4 p.m.

[Skip To Main Content](#)

Please come prepared with size information for each student. During the appointment, volunteers will be available to help you with your shopping needs. Clothes for Kids is a donation-based program that is intended as a supplemental resource. As such, the program may not be able to meet all of the needs of all students.

DONATIONS ACCEPTED

We appreciate donations of clean, school-appropriate, gently-used or new clothing and shoes.

Most urgent needs:

- Boys and mens winter jackets, sizes 10-XXL
- Boys and girls jeans and pants (elastic waist preferred), sizes 5-10
- Girls short-sleeve shirts, sizes 6-18, S-XXL
- Boys & mens athletic shorts, sizes boys M - mens XXL
- Mens athletic shorts, all sizes, especially L-XL
- Girls leggings, sizes 6-8
- Womens underwear, S-M (5-6), must be new in package
- Mens underwear, M (boxer briefs preferred), must be new in package
- Socks in all sizes, especially boys and girls large for shoe size 3-9; must be new in package
- Boys sneakers size 5-8.5

Ongoing needs of the program:

- New underwear and socks for all ages and sizes
- Pants for elementary-aged students in sizes 5-12
- Coats for elementary-aged students in sizes 5-12
- Department store shopping bags with handles

Please call Volunteer Services at 503-356-4443 to schedule "lost and found" school drop-offs.

We accept financial contributions. Please make checks payable to Clothes for Kids and mail to 16550 SW Merlo Road, Beaverton, OR 97003. You also can donate online using our [**Online Payment System \(/fs/pages/1274\)**](#). Select "Beaverton School District," then select "Clothes for Kids Donation." All the proceeds go to purchasing clothing and shoes for BSD students.



Clothes for Kids



What to Expect After Making an Appointment

English

Clothes f...



Español

[Skip To Main Content](#)

Clothes f...



العربية

Clothes f...



Soomaali

Dharka C...



► Frequently Asked Questions/Preguntas & Respuestas

► English

Q: What is the Beaverton Schools Clothes for Kids?

A: The Beaverton Schools Clothes for Kids is a volunteer service organization that provides free clothing for children in need in grades K-12 who are enrolled in a BSD school. It is staffed by Beaverton School District community and parent volunteers. Parent groups and individuals also support Clothes for Kids with financial contributions that are used to purchase new articles of clothing such as socks, underwear and coats.

Students can find school-type clothing at Clothes for Kids such as: jeans, t-shirts, sweatshirts, warm coats, socks and underwear.

[Skip To Main Content](#)

Q: Who can use the Clothes for Kids?

A: Children in need, enrolled in the Beaverton School District may visit Clothes for Kids up to two times (2) each school year and choose ten (10) items per visit. We do not provide clothing for adult members of the family.

Q: Where is Clothes for Kids and when is it open?

A: Clothes for Kids is located in portables on the west side of the Beaverton School District Administration Center at 16550 SW Merlo Road. It is open Tuesdays: 9:30 a.m. - 3 p.m., Wednesdays: 9:30 a.m. - 6 p.m., and Thursdays: 9:30 a.m. - 3 p.m. It is closed during the summer.

Q: Where do clothes for Clothes for Kids come from?

A: Most clothing comes from caring individuals who donate reusable clothing still suitable for children in grades K-12 to wear to school. Clothing also comes from lost and found items left at Beaverton schools. Clothes for Kids has several silent business partners who wish to remain anonymous.

We ask that donated clothing be in good condition (freshly laundered, please) using the rule of thumb, "Would I want my child to wear this to school?" It is important that clothes be free from stains, tears, rips, holes, etc. We want children to feel good about themselves and the clothing that they choose at Clothes for Kids.

Q: What can I do to help Clothes for Kids?

A: Volunteers are the mainstay of operation for Clothes for Kids. The program cannot function at full capacity without volunteer support. Interested volunteers can login to their myimpactpage.com profile to sign up for open shifts. Shifts are available on Tuesdays and Thursdays from 9:15 to 11:30 a.m., 11:15 a.m. to 1:30 p.m. and 1:15 to 3:30 p.m. On Wednesdays, volunteer shifts are 9:15 to 11:45 a.m., 11:30 a.m. to 1:45 p.m., 1:30 to 3:45 p.m. and 3:30 to 6:00 p.m.

Per **OAR 333-019-1030** (<https://nam10.safelinks.protection.outlook.com/?url=https%3A%2F%2Fsecure.sos.state.or.us%2Foard%2FdisplayDivisionRules.action%3FselectedDivision%3D1234&data=05%7C01%7CMeli>:

all volunteers — whether inside or outside, whether during the school day or after-school hours — must receive either the two-dose Pfizer or Moderna vaccine OR the single-shot Johnson & Johnson vaccine AND be at least 14 days past their final vaccine dose. At this point, booster shots are not required.

If you have any questions or need assistance signing up to volunteer, please call Johanna Shrout at 503-536-4443 or send an email to johanna_shrout@beaverton.k12.or.us (mailto:johanna_shrout@beaverton.k12.or.us).

In addition to helping families shop, volunteers help sort and hang donated clothing, launder clothes, conduct clothing drives and help clean the facility. A considerable amount of volunteer work continues in the summer.

► Español

¿Qué es el Clothes for Kids de las escuelas de Beaverton (anteriormente conocido como El Ropero de Beaverton)?

Clothes for Kids del Distrito Escolar de Beaverton es una organización formada por voluntarios que ofrece ropa a estudiantes en los grados K-12 que están inscritos en alguna escuela del Distrito Escolar de Beaverton. El personal de Clothes for Kids está formado por miembros de la comunidad y padres voluntarios. La asociación de padres y los miembros de la comunidad también ayudan a Clothes for Kids con donativos que se usan para comprar prendas de ropa nueva tales como medias, ropa interior, abrigos y otras prendas de vestir difíciles de encontrar.

En Clothes for Kids, los estudiantes pueden encontrar ropa para usar en la escuela tales como pantalones de mezclilla, playeras, camisas polo, sudaderas, abrigos para el invierno, medias y ropa interior.

¿Quién puede usar la ropa de Clothes for Kids?

[Skip To Main Content](#)

Los estudiantes de bajos recursos inscritos en el Distrito Escolar de Beaverton pueden tener acceso al Ropero dos veces (2) durante el año escolar y escoger (10) prendas de vestir gratis por visita. Nosotros no proporcionamos ropa para personas adultas de la familia. Se requiere un pase de la escuela de su hijo para tener acceso a Clothes for Kids.

¿Dónde está ubicado Clothes for Kids y cuando está abierto?

Clothes for Kids se encuentra en el salón provisional al costado oeste de las oficinas administrativas del Distrito Escolar de Beaverton ubicado en 16550 SW Merlo Road. Está abierto cuando hay clases: martes - de 9:30 a.m. a 3:00 p.m., miércoles - 9:30 a.m. a 6:00 p.m. y jueves - 9:30 a.m. a 3:00 p.m. Clothes for Kids está cerrado para las familias durante el verano.

¿De dónde viene la ropa de Clothes for Kids?

La mayoría de la ropa la donan personas bondadosas y es ropa usada en buenas condiciones para estudiantes de K-12 y apropiada para usar en la escuela. La ropa que donan a Clothes for Kids también proviene de *lost and found* (ropa y objetos perdidos que no hayan sido reclamados) de las escuelas de Beaverton. El Ropero también recibe donaciones de negocios colaboradores que desean mantenerse anónimos.

Nosotros pedimos que la ropa que van a donar esté en buenas condiciones (recién lavada por favor) siguiendo la regla práctica, “¿me gustaría que mi hijo se pusiera esto para ir a la escuela?” Es importante que la ropa no tenga manchas, que no esté desgarrada, ni esté rota, etc. Queremos que los niños se sientan bien al ponerse la ropa que elijan en el Clothes for Kids.

¿Cómo puedo ayudar en Clothes for Kids?

Los voluntarios son el pilar principal para el funcionamiento de Clothes for Kids. El programa no puede funcionar su total capacidad sin la ayuda de voluntarios. Personas interesadas en ser voluntarios pueden ingresar a su perfil en la página de myimpactpage.com para registrarse en los turnos disponibles. Hay turnos disponibles los martes y los jueves de 9:15 a.m. a 11:30 a.m., 11:15 a.m. a 1:30 p.m., y 1:15 p.m. a 3:30 p.m. Los turnos disponibles los miércoles son de 9:15 a.m. a 11:45 p.m., 11:30 a.m. a 1:45 p.m., 1:30 p.m. a 3:45 p.m., y de 3:30 p.m. a 6:00 p.m.

Por el reglamento [OAR333-019-1030](#), todos los voluntarios (sin importar adentro o afuera de las instalaciones, ni durante o después del día escolar) deben tener 2 dosis de la vacuna de Pfizer o Moderna, o 1 dosis de la vacuna de Johnson & Johnson. Además, un mínimo de 14 días debe de haber transcurrido después de su última dosis y su sesión de voluntariado. En este momento no estamos requiriendo la dosis de refuerzo.

Si usted tiene alguna pregunta o necesita ayuda para registrarse como voluntario, por favor llame a Johanna Shrout al 503-356-4443 o envíe un correo electrónico a johanna_shrout@beaverton.k12.or.us

Además de ayudar a las familias a escoger ropa para sus hijos, los voluntarios ayudan a separar y colgar la ropa donada, a lavar la ropa, a organizar subastas de ropa y a limpiar el lugar. Una cantidad considerable de trabajo continúa en el verano para los voluntarios.

EXHIBIT P



Home

Immediate Financial Assistance

Rental Assistance

Free Food Pantries

Utility Bill Help

Free Stuff

Work From Home Jobs

Public and Government Assistance

Disability Benefits

Section 8 Housing and Apartments

Senior Help

Free Job Training

Free Money

Free Grants

Free Clothes

Charity Assistance

Church Assistance

Community Action Agency

Help with Medical Bills

Free Healthcare

Free Community Health Centers

Free Dental Clinics

Car Payment Assistance

Debt Relief

How to Save Money

Search the Website

Catholic Charity assistance programs near you.

Catholic Charities provides a number of emergency assistance programs to families, immigrants (documented or not), women and others. A comprehensive listing of the **Catholic Charity financial assistance programs for rent or housing, utility bills, free food or healthcare and counseling services offered are listed below**. People of all backgrounds and religions may be able to receive help. Also find locations, applications and phone numbers of the main Catholic Charity offices near you, and they are listed by state and county.

There are over 3,000 offices, parishes, and Catholic Charity churches that help over 15 million individuals each year. The services offered by Catholic Charities are extensive, and range from free or low cost food, housing programs to strengthen families, rent help, and financial help paying for basic needs or electric bills. The exact types of Catholic Charity programs near you and social services offered will vary by **location, church, and center which are listed below**. Most of the centers only have a limited amount of funding to offer as well.

Financial assistance and basic needs from the charity

The food pantries, Catholic Charity soup kitchens and free food banks that are available to struggling families is how Catholic Charities helps the highest number of people. Millions of free hot meals, emergency food and grocery boxes, and holiday meals (including at Christmas) are provided every year with items given to low-income households.

The pantry often serves as a bridge to the client while they find longer term support. From time to time groceries, food boxes and lunch or dinner meals may even be delivered as well to the homebound, seniors or disabled as part of Meals on Wheels. Most of the Catholic Charity churches are also involved in running soup kitchens as well as congregate dining sites in addition to having grocery giveaways.

A number of **emergency housing services** are offered by Catholic Charities. People who were evicted can find homeless shelters shelter. Individuals can then work with a case manager to move into short term transitional housing, then together you will explore permanent housing options in your local community. As part of this the Catholic Charity social worker will show clients how to get financial help, including funds for paying security deposits and first month's rent.

Catholic Charity affiliated churches may offer **financial assistance for paying bills** as well as for other basic needs. Of course funding needs to be available, and applicants need to meet conditions before Catholic Charities will provide them with any type of emergency financial help. There is often a waiting list in place by each church, and applications for funds are first come and served. Cash assistance can be provided to the working poor to pay for some or all of the following.

Single Mother Assistance

Ad SPAOA

Housing Appical

Ad usafundi

Coming Soon to West Linn

Ad David Weekley Homes

Rent Re Program Rent Pa

Ad unitedfar

Utilities - Money to pay to prevent a disconnection of electric or water bills. Or if you have run out of heating fuel or oil then Catholic Charities may help.
Clothing - Including work uniforms, free clothes for kids or adults and school for children attending school.
Funeral and burial help from Catholic Charities - The uninsured, low-income and indigent can get help burying, or

- cremating, a loved one from the charities, with a focus on people of Catholic or Christian faith.
- **Prescriptions** - Only a select few locations can pay for medications or give free prescription vouchers, and this form of assistance is very limited.
- **Rental assistance** - Get help in an emergency to pay rent if you are faced with imminent eviction, and some funds can be paid for security deposits.
- **Medical needs** - Catholic Charities often has information on clinics, free healthcare services or applications to Christian health insurance programs.
- **Charity dental care** - Social workers refer the poor, immigrants and uninsured to mobile dental clinics, dentists that volunteer, and other free exams or care. Locate dental charity programs.

Before any financial aid is offered, they will usually need to ensure low-income people can get back on their feet after the funds have been paid out. As the emergency assistance for basic needs is very short term in nature, and all applicants need to show the ability to be self-sufficient. Other resources offered are listed below, or find additional information on high demand services, such as help with rent payments.

Free holiday assistance is provided by Many Catholic Charity churches. They help people regardless of their age, religion, ethnicity or gender. Catholic Charities will usually serve free meals at Thanksgiving, Christmas and Easter. Kids from low-income household, single mother homes (or women facing DV) can often be given free Christmas toys, gifts, presents, gift cards and other support. Find a Christmas toy giveaway.

Search for

Catholic Charities social services

Applicants will normally be assigned either a case or social worker. This is done as the Catholic Charities near you wants to partner with the client to stabilize their situation. This process will involve the client and social worker partnering together to address everything from employment to budgeting, parenting classes, credit repair services and much more. The charity can help the poor get back on track or work to rehouse the homeless.

Counseling, including refugee services, immigration, assistance for pregnancy, adoption, and more. This form of outreach is one of the main social services available. The free counseling sessions are used to empower the client. Catholic Charities also has a focus on overall family development, whether that is for pregnant moms to be or immigrants to the area. There are also referrals given too, including details on how to find help for immigrants or other vulnerable groups.

Search for

Catholic Charity immigration programs are available. They help refugees, migrant workers, people seeking asylum and newcomers with a wide variety of needs. There is help for housing, pro bono lawyers that assist with legal needs such as documentation or work papers, relocation of immigrants and so much more. The goal of Catholic Charities is to help immigrants stay housed, fed, and address legal needs too. More on pro bono lawyers for immigrants from Catholic Charities.

Yahoo! Search

Ad Lifestyle Insights

Employment services, including career counseling and resume review, are provided to almost 100,000 people per year by Catholic Charities. Social workers and case managers from Catholic Charities know that finding a job and increasing a client's skills and income is key to becoming self-sufficient.

Locations of Catholic Charities near you and phone numbers

There are thousands of locations around the country, however the main regional offices as well as telephone numbers for assistance are noted below. Whether it is free clothes, food, or health care, or financial help, assistance is offered to the low-income, homeless, and struggling.

If a center isn't in your town or city then call a nearby Catholic Charity organization near you or try a church. Many cover nearby counties or they may have information on other churches or organizations in your immediate area.

Alabama

Baldwin Alabama Catholic Charities

Immigrants, seniors, families with children and the poor can receive aid including food, utility help, and more. Continue with Baldwin County.

Catholic Social Services, Birmingham

2121 3rd Avenue North

Birmingham, Alabama 35203

Phone number - (205) 838-8316. Or more on Catholic Charities Birmingham programs.



Catholic Social Services, Mobile

Primary address: 400 Government Street

Mobile, AL 36602

Call - (251) 434-1550, or click here for details on Mobile Catholic Charities assistance programs.

Alaska

Catholic Social Services, Anchorage

3710 East 20th Avenue

Anchorage, Alaska 99508

Telephone number is (907) 276-5590. Read more on Catholic Charities Alaska.

Arizona

Catholic Charities Community Services, Phoenix

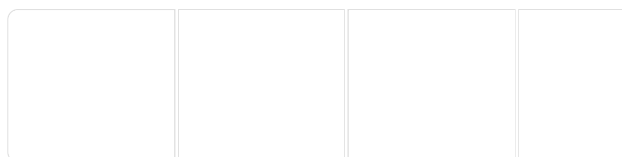
Primary address - 4747 North 7th Avenue
Phoenix, Arizona
Dial for help and hours - (602) 285-1999. Get information assistance programs, including those from Catholic Charities in Phoenix and Mesa area.

Foundation for Senior Living, Phoenix

1201 East Thomas Road
Phoenix, Arizona 85014
Call (602) 285-1800

Catholic Community Services of Southern AZ, Inc.

1023 North Tyndall Avenue
Tucson, Arizona 85719
Telephone number is (520) 624-6452. As indicated, a large territory is supported. Get referrals to public aid, food pantries, thrift stores, and limited amounts of emergency cash assistance for bills. Immigrants and refugees are supported too. Continue with Pima County.



Femme Fatale Offers
Temu

The entire **Southeastern Arizona region** has access to churches and Catholic Charity assistance programs. Various financial assistance programs are offered. [Click here](#) Catholic Charities Southeast Arizona assistance programs.

California

Catholic Charities - Diocese of Fresno. Call (559) 237-0851, or read more and the services offered and how to get help from Kern and Fresno County Catholic Charities.

The coast is also supported by churches and centers as well. Get details on Monterey County Catholic Charities assistance programs.

Catholic Charities of Los Angeles

307 Warren Street
Telephone number is (323) 266-3130
1531 West 9th Street
(213) 251-3400
Several centers are available in southern California. Various emergency assistance programs (rent, food, utilities), job training programs, food, and immigration services are offered. The three sites include:

Long Beach.

Los Angeles County

Ventura County is supported too. More on help from Ventura County Catholic Charities.

Catholic Charities of the Diocese of Monterey, Seaside - 831-393-3110

Catholic Charities of the East Bay / Oakland

433 Jefferson Street
Oakland, California 94607
Call (510) 768-3100 for help. Or find more Alameda County and Catholic Charity Oakland programs.

Catholic Charities of Orange County, Santa Ana California

Read more on programs administered at Orange County Catholic Charities.

Catholic Charities of Sacramento, Inc.

Partners with many non-profits and churches in northern California. Meals, shelter, housing, rental assistance, and much more can be offered to the needy by this Sacramento location.

Catholic Charities, San Bernardino

Address: 1800 Western Ave # 107
San Bernardino, California 92411

Telephone number - (909) 880-3625. The location also covers Riverside. Find details on Riverside and San Bernardino County Catholic Charities emergency assistance programs.

Catholic Charities, San Diego

4575 Mission Gorge Pl # A

San Diego, California

Dial (619) 287-9454 to get information on resources available. However it can include vouchers for food or clothing, emergency funds for rent (if being evicted) or utilities (if shut off). Continue reading on San Diego County.

Catholic Charities CYO, San Francisco

180 Howard St #100

San Francisco, CA 94105

(415) 972-1200

A focus of this agency is on addressing housing, homelessness, and evictions. Self-sufficiency, employment services and more may be available. More information San Francisco Catholic Charities assistance.

Santa Barbara County and nearby towns are covered as well. Various churches and groups partner with Catholic Charities. Continue with Santa Barbara County.

Catholic Charities of Santa Clara County

Address: 2625 Zanker Rd # 200

San Jose, California 95134

Main number - (408) 468-0100

Addressing the housing and nutritional needs of northern California residents is a focus. Information is also offered for job training and immigration services. Read more Santa Clara County Catholic Charities.

Catholic Charities, Santa Rosa

987 Airway Court

Santa Rosa, California

Main number is (707) 528-8712

Resources are offered for the entire county. Get more details on Catholic Charities in Sonoma.

Catholic Charities of Stockton

1106 North El Dorado Street

Stockton, CA 95202

(209) 444-5900. Click more Stanislaus County Catholic Charity programs.

Colorado

Boulder County. More information on Catholic Charities Boulder County.

Catholic Charities of Central Colorado

14 West Bijou Street

Colorado Springs, Colorado

Telephone - (719) 475-7314

Catholic Charities Archdiocese of Denver

Address: 4045 Pecos Street, Denver, Colorado

Please call 720-377-1313 from Monday - Friday 8:00 - 8:45 AM to make an appointment. Click here for details on Catholic Charities Denver County.

El Paso County area

Catholic Charities help migrant workers, the unemployed and working poor. Whether financial aid,

clothes, food or basic needs from thrift stores, help is offered. Continue with emergency help El Paso Colorado Catholic Charities.

Catholic Charities Diocese of Pueblo. Get information on their services from Pueblo Catholic Charities.

Connecticut

Catholic Charities of Fairfield County, Inc. Bridgeport CT. Telephone 203.416.1503
All of Fairfield County is supported. More information on Catholic Charities Fairfield County.

Catholic Charities Archdiocese of Hartford
839 Asylum Ave # 841
Hartford, CT
(860) 493-1841. Click here for additional information on assistance from Catholic Charities in Hartford.

Catholic Charities, Diocese of Norwich, Inc.
331 Main Street
Norwich, Connecticut
(860) 889-8346
Read more on locations in the region and the programs they offer, including in New London and Middlesex.

Delaware

Catholic Charities Inc., Diocese of Wilmington DE, call 302-764-2717. Read more on Delaware Catholic Charity assistance programs.

District of Columbia

Catholic Charities of the Archdiocese of Washington DC
924 G Street Northwest
Washington, DC
Telephone number is (202) 772-4300. Click for information on Washington DC Catholic Charities.

Florida

Catholic Charities Bureau, Inc., St. Augustine Jacksonville, Florida. Assistance programs are offered to residents of all of Duval County. Find immigration support, free referrals, emergency rent and utility bill help and more. More Jacksonville and Duval County area assistance programs.

Catholic Charities of Central Florida
1819 North Semoran Boulevard Orlando, FL 32807
Dial - (407) 658-1818. Priority is for seniors, parents with children, and other low income families in the Orange County region. Funds for cooling bills, food, school supplies, clothing and more is distributed. More on Orlando.

Columbia County region Catholic Charity supports the county and surrounding region, such as Lafayette and Hamilton. Call (386) 754-9180, or learn more Columbia County FL Catholic Charities resources.

Dade County

The organization helps the low income and needy in southern Florida. Find Miami - Dade locations.

Catholic Charities of NW Florida
1815 North 6th Avenue
Pensacola, Florida
(850) 436-6411. Find more information on Tallahassee area Catholic Charities.

Catholic Charities, Inc. Palm Beach, FL, Palm Beach Gardens. Click here Catholic Charities Palm Beach County

Polk County Florida and east to Brevard
Seniors and the working poor in the greater Florida region have access to several centers if they need help. Read more Catholic Charities assistance programs Brevard and Polk County.

Naples regional Catholic Charities
A few centers are in the area. Learn more on Collier County Catholic Charities.

Pasco County. Find details on help from Pasco County FL Catholic Charities.

Catholic Charities Diocese of St. Petersburg, Inc.
Main address: 1213 16th St. N.
Saint Petersburg, Florida 33705
Find more assistance in Pinellas County and St. Petersburg.

Sarasota, southwest Florida and Lee County

In addition to help for the low income, churches in Florida also have many programs for seniors. Find Lee County Catholic Charity locations and other centers in the southwestern part of the state. Or get help in Sarasota.

Tampa Bay and Hillsborough Florida

Programs include food, housing, referrals, and assistance for immigrants. Read about financial help, immigration services and support from Catholic Charities Hillsborough County.

Catholic Charities, Diocese of Venice, Inc. - This is a Florida organization. Dial 941-484-9543

Volusia, Flagler, St. Johns and eastern Florida

Several Catholic Charity churches and resources focus on this region. If you need food, are faced with eviction / homelessness, or need emergency help, then find who to contact in the St. Johns County region.

There are also emergency services in the **Daytona Beach region**. Catholic Charities may arrange grants for families in a crisis, car repairs, address unexpected medical expenses, and other aid. Find details on Catholic Charities in Volusia County.

Georgia**Catholic Charities Atlanta**

Office location is 680 West Peachtree Street Northwest
Atlanta, GA 30308
Call (404) 881-6571, or read more on Catholic Charities Atlanta area.

Catholic Social Services, Savannah - Telephone (912) 201-4100

Hawaii**Catholic Charities Hawaii**

1822 Keeaumoku St
Honolulu, HI 96822
Call (808) 524-4673. Provides referrals across the state. More on Catholic Charities Hawaii.

Idaho

Catholic Charities of Idaho, Boise (phone (208) 345-6031)
No matter what town, county, or city you live in, dial this center for referrals and information. Continue with Catholic Charities in Idaho.

Illinois**Catholic Charities of Chicago**

721 North La Salle Drive
Chicago, IL
312-655-7700

There are several other centers in the Cook County region that help the low income with paying rent, utilities, and medications. Find more Chicago Catholic Charity locations.

Catholic Charities, Joliet

Address: 203 North Ottawa Street
Joliet, Illinois
(815) 723-0582
Locations also serve the low income in Dupage and Will County.

Lake County and Chicago suburbs residents are also supported by Catholic Charities. Employment resources, immigration services, holiday and financial assistance are all offered. More on Lake County Catholic charity assistance programs.

Kane, McHenry and Winnebago County Illinois and surrounding towns can get financial assistance, rent help, food, and more from their local Catholic Charities. Click here for more on Kane, Winnebago, and McHenry programs.

Catholic Charities of Macon, Sagamon Illinois and nearby regions. Continue with finding financial aid and social services from Catholic Charities Macon and Sagamon County.

Churches in Peoria County

The charity, some of which are Catholic and others are of a different religion, provide free food, baby formula and items to parents. There may also be various social services as well as financial support to the working poor, including seniors. Continue with Churches in Peoria and Tazewell..

Catholic Charities of Southern Illinois, Belleville, call (618) 235-9601

Southwestern Illinois

The region, including St. Clair and Pulaski County is supported by several charities. More on St. Clair County Catholic Charities.

Catholic Charities, Inc., Springfield, IL

1625 West Washington Street
Springfield, IL
(217) 546-2515

Indiana**Catholic Charities of Evansville, (812) 423-5456****Catholic Charities, Fort Wayne-South Bend**

15 East Washington Boulevard
Fort Wayne, Indiana
Telephone - (260) 422-5625. Continue with St. Joseph and Fort Bend.

Catholic Charities, Gary

Address: 40 Broadway Gary, Indiana 46402
Telephone number is (219) 886-3565. Case managers and volunteers serve the region of Lake County Indiana, and may have limited amounts of cash assistance for expenses such as heating bills or rent. More on Gary Catholic Charities.

Catholic Charities of the Archdiocese of Indianapolis, Inc. Several centers operate in Marion County and offer financial assistance for basic needs. More Catholic Charities Indianapolis.

Southwestern Indiana

Several counties in this part of the state are supported by Catholic Charity services. While financial aid is limited, social workers will try to help the needy. More on Catholic Charities Southwestern Illinois emergency assistance.

Iowa**Catholic Charities, Davenport - (563) 324-1911****Catholic Charities, Des Moines**

601 Grand Ave, Des Moines, IA 50309
Dial (515) 244-3761 for intake. Or click more details on Catholic Charity church assistance programs in Des Moines.

Catholic Charities, Dubuque

Primary address: 1229 Mount Loretta Ave
Dubuque, IA 52003
(563) 588-0558

Catholic Charities, Sioux City - (712) 252-4547**Kansas****Catholic Social Service, Dodge City**

Office address: 906 Central Avenue
Dodge City, KS 67801
Telephone: (620) 227-1562

Catholic Charities of Northeast Kansas, Overland Park, (913) 433-2100

Several counties are supported by this regional Catholic Charity Diocese. Dozens of services are administered. Learn more on emergency help from Northeast Kansas Catholic Charities.

Also get information on the Leavenworth region.

Catholic Charities of Salina, Inc., 888-468-6909

Southwest Kansas - Several emergency assistance programs and social services are administered. Learn more on help from Southwest Kansas Catholic Charities.

Churches in Wichita Kansas area. The charities have free food from a pantry, gasoline vouchers, Christmas programs are more for the region, including Sedgwick, Harvey, Butler and other counties. More on church assistance programs in Wichita.

Kentucky**Catholic Charities, Inc., Covington, KY**

3629 Church Street Covington, KY 41015
(859) 581-8974
The center supports multiple counties in northern Kentucky. Thousands of families receive assistance

from the charity every year. Learn more on assistance from Kenton Catholic Charity assistance programs.

Catholic Charities of Louisville, Inc.

This is the Kentucky center. Phone - (502) 636-92631. More on Jefferson County and Louisville.

Catholic Charities Diocese of Lexington

Address is 1310 West Main Street

Lexington, KY 40508

(859) 253-1993.

Churches offer a number of services, ranging from money for paying rent to free furniture, a free food bank, homeless shelters and more. Continue with Lexington Catholic Charities.

Catholic Charities of the Diocese of Owensboro, KY

Louisiana

Catholic Charities & Special Ministries, Alexandria, Louisiana

Phone number - (318) 445-6424

Catholic Charities of the Diocese of Baton Rouge

1900 South Acadian Thruway

Baton Rouge, Louisiana 70808

Call the location at (225) 336-8700 for hours and list of services, or find details on Baton Rouge assistance.

Catholic Charities, Houma-Thibodaux Louisiana, 985-876-0490. This center covers the entire parishes of both Terrebonne and Lafourche. Continue with Catholic Charities Terrebonne and Lafourche Parish.

Catholic Office of Justice and Peace, Lafayette, LA. Call (337) 261-5654. Find more details on Iberia and Lafayette Catholic Charities.

Catholic Charities Archdiocese of New Orleans

Call - (504) 523-3755. Housing, rent, food, vouchers for groceries, and more is available in New Orleans Louisiana.

Catholic Charities of Shreveport

Center is located at - 331 East 71st Street

Shreveport, LA 71106

(318) 828-1456. There may be emergency financial help, hot meals, legal support and social services, regardless of religion. Click additional details on this Shreveport and Caddo Parish Catholic Charity organization.

Catholic Charities of Southwest Louisiana, Lake Charles, main phone number 337-439-7436

This location supports over 20 parishes in the southern and western part of the state. Read more Catholic Charities southwest assistance programs.

Maine

Catholic Charities Maine, Portland. Telephone (207) 781-8550.

This is the main organization for anyone in the state of Maine to call. Get information on free food, emergency financial assistance, housing, and other services. Read Catholic Charities Maine assistance programs.

Maryland

Catholic Charities of the Archdiocese of Baltimore. Main number is 410.547.5490.

May have emergency assistance for bills. Other services include food, job training, and referrals. Find more details on the Baltimore agency.

Montgomery County. Additional services are provided to residents in this region. Social services, financial aid, and other services are offered in Montgomery County Maryland.

Massachusetts

Catholic Charities - Boston

51 Sleeper Street

Boston, Massachusetts 02210

Telephone - (617) 482-5440. Click here Boston Catholic Charities.

Essex County and northern Massachusetts

The region, including Lawrence families, can receive help if they meet requirement. Click Essex County Catholic Charities.

Catholic Social Services, Fall River

Address is 1600 Bay Street

Fall River, MA 02724

(508) 674-4681

The churches and Catholic Charity organization provide assistance to all of southern Massachusetts, including Bristol, Barnstable and nearby counties. They help the poor, non-English speakers, unemployed and others. Continue with Bristol and Barnstable Catholic Charities assistance programs.

Catholic Charities, Springfield, MA

Location - 254 Bridge Street

Springfield, Massachusetts 01103

(413) 452-0605

Catholic Charities Worcester County

10 Hammond Street

Worcester, MA 01610

Call (508) 798-0191, or continue reading on Catholic Charities Worcester.

Michigan**Charities in Ann Arbor and Washtenaw region**

Assistance, including meals, case management, rent help, and more is offered. Continue with Catholic Charities Washtenaw County programs.

Catholic Social Action SE Michigan and Detroit

Programs are offered in multiple counties, including Lapeer, Macomb, Monroe, Oakland, St. Clair and Wayne.

Call 855-882-2736 or (313) 883-2100

There are assistance programs for women or immigrants, including free legal clinics. Or get referrals to income support benefits, free food or meals and other support. More on SE Michigan Catholic Charities.

Catholic Family Services, Kalamazoo

Address is 1819 Gull Road

Kalamazoo, Michigan 49048

Phone number is (269) 381-9800

Catholic Charities of Shiawassee and Genesee Counties

Call this non-profit for referrals and assistance. More on Flint Catholic Charity programs.

Catholic Charities of the Upper Peninsula, Marquette**Catholic Charities West Michigan**

Primary address: 40 Jefferson Ave SE

Grand Rapids, Michigan 49503

Dial the center at (616) 551-4747, or click here for details on Kent County Catholic Charities assistance programs.

Minnesota**Catholic Charities of St. Paul and Minneapolis**

Click here for phone numbers, addresses, and information on their financial assistance programs. There is a low cost thrift store, free winter coats, elder care and other help, including for immigrants. More on Catholic Charities Minneapolis.

Catholic Charities of the Diocese of New Ulm Minnesota. Telephone 1-(866) 670-5163

Ramsey County also has churches focused just on that county. The main center offers transitional housing, financial aid, and other support to the working poor. Find details on Catholic Charities in Ramsey County.

Catholic Charities, Saint Cloud - (320)229-4563**Catholic Charities, Winona Minnesota.** Telephone (507) 454-2270

Mississippi

Catholic Social & Community Services, Biloxi

Primary center location is 1790 Popp's Ferry Road

Biloxi, MS

Call (228) 702-2100

Programs are available across southern Mississippi. Free food, energy bill assistance, rent help, and more is available. Read more on Southern Mississippi Catholic Charities assistance programs.

Catholic Charities Diocese of Jackson, Mississippi

North Congress Street

Jackson, MS 39201

Phone - (601) 355-8634

Missouri

Catholic Charities of Kansas City-St. Joseph Inc.

1112 Broadway Street

Kansas City, MO 64105

Dial (816) 221-4377.

Whether housing, money to pay energy or water bills, or assistance for pregnant women, help is offered.

More details on assistance from Kansas City Catholic Charity assistance programs.

Catholic Charities of Central & Northern Missouri, Jefferson City, telephone 573-634-8568

Catholic Charities of Southern Missouri, Springfield, (417) 866-0841. Additional details

Southwestern Missouri Catholic Charities.

Catholic Charities of St. Louis

4532 Lindell Boulevard

St. Louis, Missouri 63108

(314) 367-5500. Click details St. Louis Catholic Charities assistance programs.

Montana

Catholic Social Services of Montana, Helena

1301 11th Avenue

Helena, MT 59601

Location is (406) 442-4130

Nebraska

Lancaster and all of southern Nebraska

A number of resources are offered. Click here Lancaster area Catholic Charities assistance programs.

Catholic Charities, Omaha

3300 North 60th Street

Omaha, NE

Primary phone number. (402) 554-0520 Call to speak to a representative.

Nevada

Catholic Charities of Southern Nevada

Address of center is 451 East Twain Avenue

Las Vegas, Nevada 89169

Dial (702) 735-4358 for information. Homeless To Home program provides assistance to the homeless or about to be evicted. It offers assistance with housing, utility payments, case management, job training resources, food, clothing and to gain self-sufficiency through employment. Continue to get more details on Las Vegas resources.

Catholic Community Services of Northern Nevada, Reno. Spiritual guidance, referrals, utility bill assistance, and low income housing may be available, as funding and donations allow. More Reno Catholic Charities.

New Hampshire

The southern part of the state is supported by Catholic Charities. A number of human services are provided to seniors and the less fortunate More Rockingham and Hillsborough County.

New Jersey

Catholic Charities, Camden

1845 Haddon Avenue

Camden, New Jersey

(856) 342-4100, or click here for information on their services. There are many social services offered by the Camden Catholic Charities assistance programs.

Jersey City area

This location serves all of Hudson County with both financial aid and programs such as workforce development. Read more on Hudson County Catholic Charities.

Catholic Charities of Metuchen, Perth Amboy, 1-732-324-8200**Catholic Charities of the Archdiocese of Newark, NJ and northern New Jersey**

Address is 590 North 7th Street

Newark, NJ 07107

(973) 482-5759

If you live in the northern part of the state, this agency may be able to assist. More on Bergen and Essex County Catholic Charities.

Catholic Charities of the Diocese of Paterson

Address: 24 De Grasse Street

Paterson, New Jersey

Telephone number to dial for services is (973) 279-7100.

Or find more details on Catholic Charity church services in Passaic County.

Catholic Charities, Diocese of Trenton

383 West State Street

Trenton, New Jersey

Call the center at (609) 394-0346. The center also assists low income families in Burlington, Ocean, and other areas. Continue with Catholic Charities Burlington, Mercer, and Ocean County.

In addition to the location above, a number of churches and charities operate across the **central portion of the state**. Get information on locations in Somerset, Warren, and nearby counties that can provide food, financial assistance, and other aid.

Union County Diocese

Some of the assistance programs include emergency food and transitional housing. Other Catholic Charity services in the region include job training, GED testing and educational support, and help for senior citizens. Click more information Union County Catholic Charities.

New Mexico**Catholic Charities-Diocese of Las Cruces - (575) 523-7577****Catholic Charities, Santa Fe, Albuquerque**

They help refugees and immigrants too, including undocumented. Find Albuquerque locations.

Sandoval County region

Low income programs, assistance for immigrants and more is provided by Catholic Charities.

San Juan region of New Mexico supports several counties with various social services. More on San Juan area Catholic Charity church programs.

New York**Catholic Charities, Albany New York**

Address is 40 N Main Ave # 3

Phone number - (518) 453-6650. The entire Capital region is supported, including cities such as Troy and Schenectady. More details on Catholic Charities Albany area.

Catholic Charities of Brooklyn and Queens

Location is 1615 8th Ave # 1

Brooklyn, New York

(718) 722-6079

Flushing 6120 Woodside Avenue, NY 11377

Call (718) 779-1234

There are a couple locations as noted above. Immigrants can get help, and there are programs for the homeless. Or find vouchers for clothes or medications, as well as financial help. Click more details on Catholic Charities Queens and Brooklyn area.

Broome County, Owego, and Binghamton - Find programs in Broome County.**Catholic Charities of Buffalo**

525 Washington Street

Phone number - (716) 856-4494. Or read more on Buffalo Catholic Charity programs.

Catholic Charities Chemung and Schuyler region

Resources are provided across the southern and the SW part of the state. More on Schuyler and Chemung County.

Chenango, Cortland, and the southern tier Catholic Charities supports the poor across the entire southern part of New York. Continue with Cortland and Chenango County.

Finger Lakes New York region, including Seneca and Cayuga Counties

The diocese supports several towns and nearby villages and regions. Read about Catholic Charities Seneca and Cayuga County.

Fulton and Oswego New York has several churches and Catholic Charity centers as well. Food, funds for energy bills, and immigration services may be offered. Read more on Oswego County Catholic Charities assistance programs.

Long Island

Residents of this region can get help from Nassau and Suffolk County centers. Learn about clothing, free Christmas assistance, and emergency funds for basic needs.

Catholic Charities of New York City

34 West 134th Street

Phone number - (212) 694-3939

Second location at 4111 Broadway

(212) 795-6860

In addition to those two centers, many other churches and charities operate in NYC. Qualified low income families, seniors, and children can get help. Assistance includes referrals, limited financial assistance, food, shelter, and a hot meal. More New York City Catholic Charity programs.

Ontario, Wayne County and nearby towns around the Finger Lakes region. More on help from Catholic Charities Finger Lakes.

Catholic Charities, Ogdensburg, NY

Resources administered include free food, emergency rental funds, case management, and employment services. Several nearby counties are supported too. Continue with Ogdensburg Catholic Charity programs.

Orange County New York. Click more details on assistance from Orange County NY Catholic Charities.

Catholic Charities of the Diocese of Rockville Centre, Hicksville. New York based. Call 516-733-7000

Catholic Charities, Rochester

1945 E Ridge Rd # 24

Rochester, New York

(585) 339-9800.

Call to apply for financial help for rent, mortgages, utilities, etc. or free basic needs. Learn more on Monroe County.

Rockland County New York Catholic Charities - Click here Catholic Charities Rockland County.

Catholic Charities of Syracuse

Address: 1654 West Onondaga Street

Syracuse, New York 13204

Phone: 315.424.1800. Continue for details on Catholic Charities Onondaga County.

The **charity also covers the regions between Albany and Syracuse**. Find Oneida and Madison County assistance programs that are administered by Catholic Charities.

Westchester County region. The charity offers a number of social services. Read more Westchester County.

Western New York Catholic Charities

Call this agency for help with heating bills, housing programs, and food. Ongoing case management may be administered too. Continue with Cattaraugus and Chautauqua regional programs.

North Carolina

Catholic Social Services, Mecklenburg County. The churches in the region help the poor, Latino and those in need. More on Charlotte, NC and Mecklenburg County.

Catholic Charities of Diocese of Raleigh, North Carolina. May also support nearby regions such as Durham and Johnston County. Continue Catholic Charities Wake County.

Wilmington and southeastern North Carolina

Churches and charities support many counties in the region. Call for information on utility bill and rent assistance, job counseling, Christmas assistance, and more. Find details churches in Wilmington.

North Dakota

Catholic Charities of North Dakota. There are several offices in the state that offer referrals. Call (701) 235-4457 for intake, or find more details on North Dakota Catholic Charities.

Ohio

Catholic Social Services - Miami Valley, Cincinnati is at 922 West Riverview Avenue, Dayton, Ohio 45402. Telephone - (937) 223-7217.

There is also **Catholic Charities of Southwestern Ohio, Cincinnati**. Address: 100 E 8th St # 5, Cincinnati, Ohio 45202. Telephone: (513) 241-7745.

Food, heating assistance, help for seniors and other aid is available. Services offered include employment, holiday assistance, emergency rent and housing and more. Click here assistance from Hamilton County Catholic Charities. More Catholic Charities Hamilton County assistance programs.

Catholic Charities Health and Human Services

7911 Detroit Avenue
Cleveland, Ohio 44102
Call the center at (216) 334-2978, or click here Catholic Charities Cleveland.

Catholic Social Services, Columbus, OH

197 East Gay Street
Columbus, Ohio
Phone number to dial for help is (614) 221-5891. Programs include senior assistance, food, immigration services, and financial help. Continue reading on Columbus Ohio resources.

Lake County and Painesville. Read more on Lake County Ohio.

Catholic Charities of Steubenville, Inc., (740) 282-3631

Summit County and Akron

Other locations operate in Ohio, including in Akron and Summit County.

Catholic Charities, Toledo

933 Spielbusch Avenue
Toledo, Ohio 43604
(419) 244-6711
This agency supports people in Lucas and Toledo Counties in Ohio, and maybe other regions. Hot meals, information on government assistance, and maybe some funds for rent or energy bills may be offered. More on Toledo Catholic Charities.

Catholic Charities Diocese of Youngstown, Ohio, (330) 393-4254. See Mahoning Catholic Charities.

Oklahoma

Catholic Charities, Oklahoma City

Address: 1501 North Classen Boulevard
Oklahoma City, OK 73106
Dial (405) 523-3012 to get hours and speak to a social worker. Find more details on Catholic Charity assistance programs in Oklahoma City.

Tulsa County Oklahoma

Assistance, referrals and other aid is available. More Tulsa Catholic Charities.

Oregon

Catholic Charities and Churches in Clackamas

Numerous social services and low income assistance programs are offered. They range from employment assistance to free food and meals for children in Oregon. More on Clackamas County.

Eugene and Lane County

The non-profit helps the low income and seniors in the region. Additional details on Catholic Charities Lane County.

Catholic Charities of Portland, OR

2740 SE Powell Blvd
Main number is (503) 231-4866. Find more details on Multnomah County Catholic Charities.

Pennsylvania

Catholic Charities Diocese of Allentown Pennsylvania

The location supports Lehigh, Northampton and other areas. More on Lehigh County Catholic Charity.

Catholic Charities of the Diocese of Altoona-Johnstown Pennsylvania - (814) 695-5579

Beaver County

Several social services and other programs are administered. More on Beaver County Catholic Charities assistance.

Blair, Cambria, and central PA

Numerous programs are offered for the low income and poor. Click here Cambria and Blair County

Catholic Charity programs.

Catholic Charities Agency, Inc., Greensburg - Westmoreland, PA

Call (724) 837-1840. Learn more on Catholic Charity emergency help in Greensburg area.

Catholic Charities, Harrisburg

Administration Office is 4800 Union Deposit Road
Harrisburg, PA 17111

Phone 717-657-4804. Has a shelter but not financial assistance.

Catholic Charities Lackawanna and Luzerne - This agency covers nearby counties as well. Find details on Lackawanna and Luzerne County Catholic Charity resources.

Montgomery County residents can turn to the Philadelphia churches and centers (per below) or Catholic Charities has operations in their own county. More on Montgomery County.

Catholic Human Services, Philadelphia

Shelter is offered during the winter, as well as access to emergency funds for heating bills. Case managers can help families meet their nutritional needs. Also learn about basic health care, medications, and other support. More on Philadelphia Catholic Charities.

Catholic Charities, Pittsburgh

212 9th St # 1000

Pittsburgh, Pennsylvania

Phone number is (412) 456-6960. Emergency assistance and low income programs are offered in all of Allegheny County. Find where to get help in Pittsburgh.

Catholic Social Services of Diocese of Scranton, Wilkes Barre - Phone 570-822-7118

Rhode Island

Social Ministry Secretariat, Providence

This location supports all of Rhode Island. Click more Providence Catholic Charities.

South Carolina

Catholic Charities of Charleston, SC. (843) 402-9115

The coastal branch assists Berkeley, Charleston and Dorchester families with basic needs including food, dental care, vision check ups, and other financial support. Click here Catholic Charities Charleston SC.

Greenville County region, including central and northern part of the state, has several churches and Catholic Charity agencies. Emergency financial aid, free food, and care for seniors is offered. Continue with Greenville and Anderson County.

Midlands - Almost 20 counties are supported by this location, including York, Orangeburg, Bamberg and surrounding the region. Find details on churches in Midland assistance programs.

Pee Dee / Myrtle Beach Coastal area. This branch supports the region around Georgetown, Horry County, and Dillon. Everything from free items for moms and babies from the Children Ministry to food and more is provided. More details on Catholic Charities Pee Dee.

Piedmont region - Almost 20 different counties around Spartanburg, the city of Greenville, Oconee, Laurens and nearby towns and cities are supported. There may be some funds for bills in a crisis, help for immigrants, credit counseling and other support. More on Piedmont Catholic Charity programs. South Dakota

Tennessee

Catholic Charities of East Tennessee, Inc., Knoxville

119 Dameron Ave, (865) 971-3570

Low income families in nearby eastern Tennessee can also call this location. Continue with assistance from Knoxville Catholic Charities

Catholic Charities of Davidson County and Tennessee, Inc.

21 White Bridge Road

Nashville, TN

Call (615) 353-6792, or get additional details on Nashville and Davidson County.

Catholic Charities, West Tennessee, Memphis

1325 Jefferson Avenue

Memphis, TN 38104

Call (901) 373-1200, or find more on Shelby County and Memphis Catholic Charity assistance.

Texas

Catholic Family Service Charities of Panhandle and Amarillo, Texas

Residents of the western portion of the state can also get help from the Panhandle area churches and locations. Various emergency assistance programs, immigration programs, food, and medical care can be arranged. Continue with Potter County Catholic Charities.

Catholic Social Services, Brownsville, San Juan Texas. Dial (956) 541-0220 for information on the services offered.

Catholic Charities of Central Texas, Austin

Location - 1625 Rutherford Ln Austin, TX 78754

Telephone - (512) 651-6100

This non-profit provides financial assistance and more to all of Travis County. More on Austin Catholic Charities

Catholic Charities of Corpus Christi, Texas, dial (361) 884-0651 for intake.

Catholic Charities of Dallas

9461 Lyndon B Johnson Freeway #128

Dallas, Texas 75243

Primary phone number is 214-520-6590.

Churches in Eastern Texas, Tyler and surrounding areas

This group of churches and charities provides assistance to several counties, including Montgomery and Taylor Texas. Food, energy assistance, housing and more is offered. More East Texas Catholic Charity programs.

Catholic Charities of Fort Worth

249 Thornhill Drive

Fort Worth, Texas 76115

Phone number is (817) 534-0814. Food, Spanish seeking serves, information, and referrals are offered. More on Fort Worth.

Catholic Charities of the Archdiocese of Galveston and Houston

Location is 2900 Louisiana Street

Houston, TX

(713) 526-4611

The second branch is located at 326 South Jensen Drive

Houston, Texas

Main number is (713) 227-9981. This centers serve the working poor, seniors, and low income in the entire region. Assistance is in Spanish too. Get more details on Harris County Catholic Charity emergency resources.

Hidalgo and Cameron Counties are also supported.

Galveston and eastern Texas residents have access to their own center as well. The location may offer free meals, holiday assistance, and emergency rent and/or utility bill help. Click more details on Galveston and Fort Bend region.

Catholic Social Services, Laredo. A few locations operate in the region. Telephone (956) 722-2443

Catholic Charities, Diocese of Lubbock, Inc.

Address is 102 Avenue J. Telephone number - (806) 765-8475. Continue reading on Lubbock County resources

Catholic Charities Community Services, San Angelo Odessa

Telephone - (432) 332-1387. Click more details Odessa Catholic Charities.

Catholic Charities, San Antonio

202 West French Place

San Antonio, Texas

Telephone number - (210) 222-1294. No matter where you live in Bexar County, if you meet income and other qualifications you and/or your family may qualify for assistance. More on San Antonio Catholic Charities.

Catholic Charities of Southeast Texas

2780 Eastex Freeway

Beaumont, TX 77703

(409) 835-7118

Utah

Catholic Community Services of Utah

745 East 300 South

Salt Lake City, Utah 84102

(801) 977-9119. Continue for more information on Salt Lake City Catholic Charity emergency financial assistance.

Vermont

Vermont Catholic Charities, Burlington

55 Joy Drive

South Burlington, Vermont 05401

Telephone number is (802) 658-6111

This charity supports the entire state of Vermont. Assistance is offered for seniors, low income families, the jobless and others. [Click here for Vermont Catholic Charities.](#)

Virginia

Catholic Charities of the Diocese of Arlington, Inc.

Address: 200 N. Glebe Road Suite 250

Arlington, Virginia 22203

703-841-2531

Catholic Charities of Eastern Virginia and Virginia Beach

269 Clearfield Avenue

Virginia Beach, VA 23462

Call location at (757) 490-4931, or find more Hampton Roads locations.

Commonwealth Catholic Charities, Richmond

1512 Willow Lawn Drive

Richmond, Virginia 23230

Call (804) 285-5900

This center supports the central and eastern Virginia regions with emergency assistance and social services. [Read more on Richmond Catholic Charities programs.](#)

Northern Virginia is served by the Fairfax County branch. Or another nearby locations is in Stafford and the Spotsylvania region.

Roanoke Virginia Catholic Charities is a leading non-profit for the region. [More on Roanoke Catholic Charities.](#)

Washington State

Clark County and southern Washington

Several social services are administered. [More details on Clark County Washington.](#)

King County and Seattle

Various resources are offered, with a focus on the disabled, seniors, and working poor. Some may pay utilities or cover employment expenses, or there is free groceries, bus tickets and more. [Locate details on Seattle and King County Catholic Charity assistance programs.](#)

Kitsap Washington

Several churches partner with Catholic Charities to help the poor and seniors in the region, including Jefferson County. [Click here Kitsap and Jefferson County.](#)

Catholic Charities of Eastern Washington - Spokane

12 East 5th Avenue

Spokane, Washington 99202

(509) 358-4250 or the Homeless Assessment number is 509-325-5005

Communities across eastern Washington are supported by this church based group and its assistance programs. [More on Spokane area Catholic Charities.](#)

Tacoma and Pierce County has a Catholic Charity organization. Basic needs from a thrift store are provided along with referrals to food, grants, and other support. [Click more information Tacoma and Pierce County Catholic Charities.](#)

Thurston County

Low income families can receive support including food, referrals, case management, and information on job programs. [Learn more on Thurston County Catholic Charities.](#)

Catholic Charities Diocese of Yakima Washington. Dial (509) 965-7100.

West Virginia

Catholic Charities West Virginia, Inc.
2000 Main St.
Wheeling WV 26003
304-905-9860

The agency and its partners provide emergency assistance and resources across West Virginia, including in Charleston and other cities. Free job training or placements, health or dental care, some emergency funds for paying bills and other resources are offered. More on West Virginia Catholic Charities emergency assistance.

Wisconsin

Catholic Charities of The Diocese of Green Bay

Primary location is 1825 Riverside Drive
Green Bay, WI
(920) 272-8234

Catholic Charities, La Crosse, (608) 782-0710

Catholic Charities, Inc. Madison, Wisconsin

426 S Yellowstone Dr. Madison, WI 53719. Call (608) 833-4800 for hours. Food, help for seniors, clothing, and other basic needs are offered. Read Madison Catholic Charities.

Catholic Charities, Milwaukee

Address: 1919 North 60th Street
Milwaukee, WI

They do not offer financial aid, but other social services may be provided. Call (414) 771-2881 for information on resources offered. Or continue with Catholic Charities in Milwaukee.

Wyoming

Catholic Charities of Wyoming, Torrington - 1-800-788-4606

More Catholic charity churches and emergency assistance phone numbers

There are other Catholic Charity social service programs as well. The faith based charity supports anyone in need, whether they are immigrants, seniors, or a family going through a hardship. Get everything from housing or rent assistance to thrift stores, bill paying services, or low cost thrift stores and so much more. Find a list of additional locations to try for financial assistance.

Related Content From Needhelppayingbills.com

- Food pantry near you
- Financial help for pregnant women
- Funeral assistance for low-income families

By Jon McNamara

Additional Local Programs

Financial Help Near You

Rent Payment Assistance Near You

Free Food Near You

Utility Assistance Near You

Free Stuff Near You

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EXHIBIT Q



WORSHIP

WELCOME (/WELCOME)

WHAT WE BELIEVE (/WHAT-WE-BELIEVE)

SUNDAY SERVICE (/SUNDAY-SERVICE)

RECORDED SERMONS (/)

CHOIR (/CHOIR)

FELLOWSHIP (/FELLOWSHIP)

JOB OPPORTUNITY (/JOB-OPPORTUNITY)

CALENDAR (/CALENDAR)

NEWS

YEAR AHEAD (/YEAR-AHEAD)

ANNOUNCEMENTS (/ANNOUNCEMENTS)

SERVE

COMMUNITY KITCHEN (/COMMUNITY-KITCHEN)

IN THE COMMUNITY (/IN-THE-COMMUNITY)

MEMORIAL DAY HOSPITALITY EVENT (/MEMORIAL-DAY-HOSPITALITY-EVENT)

ENRICHMENT

MEN'S BIBLE STUDY (/MENS-PRAYER-BREAKFAST)

WOMEN'S BIBLE STUDY AND PRAYER (/WOMENS-PRAYER-BREAKFAST)

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RECORDED SERMONS
(/)

CHOIR (/CHOIR)

FELLOWSHIP
(/FELLOWSHIP)

JOB OPPORTUNITY
(/JOB-OPPORTUNITY)

CALENDAR
(/CALENDAR)

June

Sun	Mon	Tue	Wed	Thu	Fri	Sat
				1 Noon Comm Kitchen	2 Noon Al-Anon	3
4 10:00am Worship 11:00am Fellowship	5 OFFICE CLOSED 6:00pm Al-Anon	6 8:00am Women's Bible Study/Prayer (WBSP)	7 8:00am Men's Bible Study (MBS) 1:00-3:00pm Child Evangelism 1:45pm Choir	8 10:30am Business & Finance Cte Noon Comm Kitchen 4:45pm Session	9 Noon Al-Anon	10
11 10:00am Worship 11:00am Fellowship	12 OFFICE CLOSED 6:00pm Al-Anon	13 8:00am WBSP 9:15am Mission Cte 10:15am Worship Cte	14 8:00am Men's Bible Study (MBS) 1:00-3:00pm Child Evangelism 1:45pm Choir	15 10:00am Deacons Noon Comm Kitchen 4:45pm Session	16 Noon Al-Anon 5:00pm Potluck/ Game Night	17
18 10:00am Worship 11:00am Fellowship	19 OFFICE CLOSED 6:00pm Al-Anon	20 8:00am WBSP	21 8:00am Men's Bible Study (MBS) 1:00-3:00pm Child Evangelism 1:45pm Choir	22 Noon Comm Kitchen 4:45pm Session	23 Noon Al-Anon	24 8:30-10:00am Co-Ed/Family Prayer Breakfast
25 10:00am Worship 11:00am Fellowship	26 OFFICE CLOSED 6:00pm Al-Anon	27 8:00am WBSP	28 8:00am Men's Bible Study (MBS) 1:00-3:00pm Child Evangelism 1:45pm Choir	29 Noon Comm Kitchen	30 Noon Al-Anon	



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MEDIA
PHOTO GALLERY (/PHOTO-GALLERY)
CHURCH HISTORY
CHURCH HISTORY (/CHURCH-HISTORY)
STAINED GLASS WINDOWS (/STAINED-GLASS-WINDOWS)
SANCTUARY BELL (/SANCTUARY-BELL)
MEMORIAL TREE (/MEMORIAL-TREE)
REMODEL (/REMODEL)

BROOKINGS PRESBYTERIAN CHURCH, 540 PACIFIC AVENUE,
BROOKINGS, OR, 97415, UNITED STATES 541-469-3725

Regular Sunday Schedule

10:00am Worship

11:00am Fellowship Time

Nursery Care is Available

Church Office Hours

Tuesday - Friday: 8 am - 1 pm

Office manager: Pat Van Ooyen

Pastor Bruce's Office Hours

Tuesday - Friday: 8 am - 1 pm

Available other times by
appointment

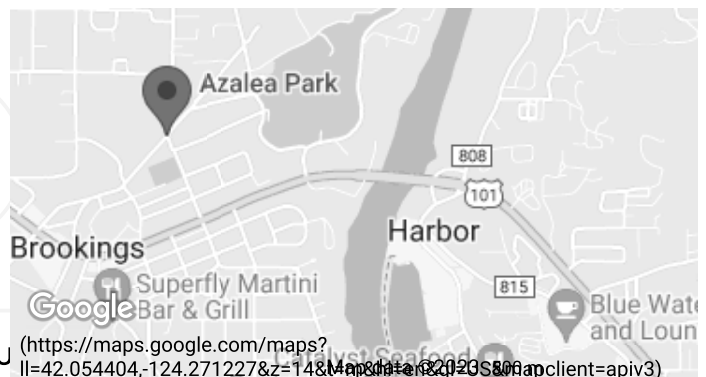
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GIVE/)

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EXHIBIT R

Brookings Nazarene Community Care Ministry: Food Pantry

Our function: to support the community by partnering with the Brookings-Harbor Community Helpers (BHCH) – local Food Bank

- We fill the gaps to support the work of BHCH Food Bank – especially on days they do not distribute food (Tuesdays & Thursdays).
- It is not necessary for us to fill the bags with EVERY item that is “checked” by the client. We do the best we can – and within reason.
- Our guideline is 2 bags per person.
- It is not wise to over-pack each bag.
- We meet the food needs by stepping in before the client’s next visit to the BHCH Food Bank.
- We don’t turn anyone away, and they can return – but we need to have enough for all who come to us.

EXHIBIT S

Document title: Services Archive - Catholic Charities of Oregon

Capture URL: <https://www.catholiccharitiesoregon.org/services/>

Page loaded at (UTC): Tue, 27 Jun 2023 17:04:49 GMT

Capture timestamp (UTC): Tue, 27 Jun 2023 17:05:38 GMT

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Collection server IP: 3.90.170.83

Browser engine: Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/108.0.5359.215 Safari/537.36

Operating system: Windows_NT (Node 16.17.1)

PDF length: 4

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User: sr-dhall

SERVICES

Catholic Charities of Oregon achieves lasting solutions to poverty and injustice by partnering with clients to meet their economic and educational goals and to support their physical and social well-being. Explore our programs and services.



HEALTHY HOUSING

Catholic Charities of Oregon develops innovative solutions for some of our region's most pressing housing challenges.

[VIEW SERVICE →](#)



HOMELESS SERVICES

With the goal of transitioning to permanent housing, Catholic Charities of Oregon gives those living outside the resources and support they need to build lasting stability and self-sufficiency.

[VIEW SERVICE →](#)



IMMIGRATION LEGAL SERVICES

Founded in 1996, our Immigration Legal Services division works to protect individuals and maintain and reunify families in need.

[VIEW SERVICE →](#)



FAMILY SERVICES

In partnership with our clients, we provide an array of family supportive



REFUGEE SERVICES

Catholic Charities provides refugee resettlement and case management



FINANCIAL WELLNESS

Financial freedom starts by saving for tomorrow. Save First Financial Wellness

FAMILY SERVICES

In partnership with our clients, we provide an array of family supportive services including counseling, case management, and education.

[VIEW SERVICE →](#)

REFUGEE SERVICES

Catholic Charities provides refugee resettlement and case management services to individuals and families who seek to make Oregon their new home.

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FINANCIAL WELLNESS

Financial freedom starts by saving for tomorrow. Save First Financial Wellness offers services that are critical to weathering a financial crisis and attaining a healthy financial lifestyle.

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INTERCULTURAL COUNSELING CENTER

We regret to inform you, that the Intercultural Counseling Center at Catholic Charities is no longer operating as of April 28th, 2023. Lamentamos informarle que el Centro de Consejería Intercultural de Caridades Católicas ya no esta brindando servicios a partir del 28 de abril de 2023.

[VIEW SERVICE →](#)



DISASTER SERVICES

When disaster hits, people go from security to vulnerability overnight. With complete recovery as the ultimate goal, we work to help survivors of disasters rebuild their lives and communities with short-, medium-, and long-term strategies, responding with care and compassion for the whole person.

[VIEW SERVICE →](#)



AUXILIARY SERVICES

Catholic Charities of Oregon spearheads several initiatives to improve the quality of life of the people we serve and empower Oregon's communities to do the same. Learn more about our projects by clicking on the tiles below.

[VIEW SERVICE →](#)



FOOD SERVICES

As hunger and poverty in Oregon continue to rise, our Food Services program partners with local organizations to provide hot meals for those who are unsheltered and offers its own culinary workforce development training to help those experiencing barriers to



POPE FRANCIS CENTER

Our center for volunteerism provides meaningful opportunities for people to engage with Catholic Charities of Oregon and their communities. By giving their time and energy in service to others, volunteers help make our mission possible. Questions about volunteering?



FOOD SERVICES

As hunger and poverty in Oregon continue to rise, our Food Services program partners with local organizations to provide hot meals for those who are unsheltered and offers its own culinary workforce development training to help those experiencing barriers to employment regain their self-sufficiency and stability.

[VIEW SERVICE →](#)



POPE FRANCIS CENTER

Our center for volunteerism provides meaningful opportunities for people to engage with Catholic Charities of Oregon and their communities. By giving their time and energy in service to others, volunteers help make our mission possible. Questions about volunteering? Email volunteer@ccoregon.org or call the Volunteer Helpline at (503) 688-2536.

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Document title: Homeless Services - Catholic Charities of Oregon

Capture URL: <https://www.catholiccharitiesoregon.org/services/homeless-services/>

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Operating system: Windows_NT (Node 16.17.1)

PDF length: 5

Capture ID: uXvd56DfMeUXh5SZ2d7QQ3

User: sr-dhall



SERVICES > HOMELESS SERVICES

HOMELESS SERVI

With the goal of transitioning to permanent housing, Catholic Charities of Oregon gives those living outside the resources and support they need to build lasting stability and self-sufficiency.



CONTACT US

P. (971) 222-1880

E. HTTPEMAIL@CCOREGON.ORG

VOLUNTEER

Join us in our work to help those experiencing houselessness regain their stability and independence.

[LEARN MORE](#)

DONATE TO: HOMELESS SERVICES

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EMPOWERING OUR UNSHELTERED NEIGHBORS WITH COMPREHENSIVE CARE

WE GIVE THOSE IN NEED THE TOOLS THEY NEED FOR SELF-SUFFICIENCY

Our Homeless Services team removes barriers to finding permanent housing and wraps clients in a suite of supportive services as they work to re-establish their stability and independence. We offer case management, employment assistance, housing, drop-in services, community outreach, and more. Through our Kenton Women's Village, Housing Transitions Program, and Street Outreach team, we give those experiencing houselessness the comprehensive support and resources they need to move forward and thrive.

Explore our programs by clicking the tiles below.



HOUSING TRANSITIONS

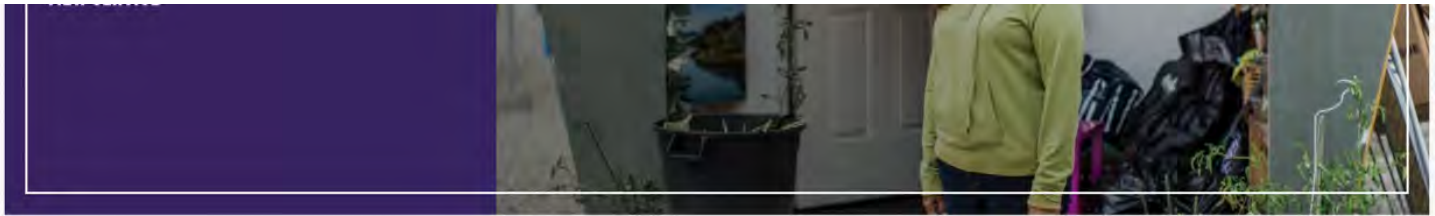
The Housing Transitions Program (HTP) is a relationship-centered program that operates on the best practice Housing First model. We assist in removing barriers to permanent housing and provide housing services to self-identified women experiencing homelessness, who are at least 25 years old, and do not have any children in their care.

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KENTON WOMEN'S VILLAGE

Kenton Women's Village is a creative and collaborative project, offering a new approach for addressing houselessness at a small scale. The villagers are empowered, have a sense of purpose, and take daily steps toward permanent housing.

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JUN 20, 2023
PARENTS LEARN ONS AND OFFS OF CLOTH DIAPERS

JUN 16, 2023
JUNETEENTH

JUN 13, 2023
CONSTRUCTION STARTS ON 137 UNITS OF AFFORDABLE
HOUSING IN NORTHEAST PORTLAND

JUN 13, 2023
THE UNIQUE VISION OF A LEADING EXPERT ON GANG
INTERVENTION AND WHAT IT CAN MEAN FOR ALL OF
SOCIETY

ARTICLES

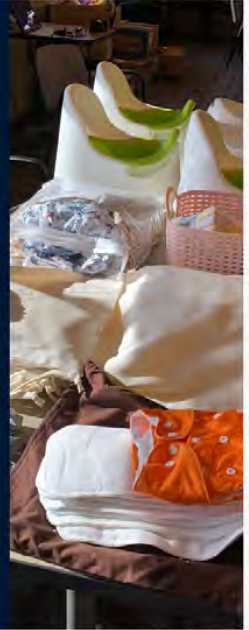
FEATURED

JUN 20, 2023

PARENTS LEARN ONS AND OFFS OF CLOTH DIAPERS

Urgent need: Baby wipes When young families go shopping, Catholic Charities of Oregon wants to make sure they don't need to choose between food and diapers. That's why the agency is grateful for the support of PDX Diaper Bank, which provides boxes of free diapers for families being helped by Catholic Charities' Refugee & Family...

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User: sr-dhall



SERVICES > AUXILIARY SERVICES

AUXILIARY SERVI

Catholic Charities of Oregon spearheads several initiatives to improve the quality of life of the people we serve and empower Oregon's communities to do the same. Learn more about our projects by clicking on the tiles below.



CONTACT US

If you need assistance and do not see what you're looking for, please reach out to us.

P. (503) 231-4866

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GIVE TODAY

GIVING COMMUNITIES THE TOOLS TO THRIVE

OUR AUXILIARY SERVICES SUPPLEMENT OUR CORE WORK AND SUPPORT THOSE WHO MAY OTHERWISE FALL INTO POVERTY.

At Catholic Charities of Oregon, we are continuously evolving our services to meet the needs of those whom mainstream society has all but forgotten. Our Auxiliary Services allow us to be flexible and creative in our work to provide unique support to those living on the margins of poverty as they develop self-sufficiency and stability. Please explore our services by clicking the tiles below.

THE BORDER IS EVERYWHERE

In partnership with Catholic Charities USA, the United States Conference of Catholic Bishops (USCCB), and the Catholic Legal Immigration Network (CLINIC), Catholic Charities of Oregon supports access to wraparound services that promote the healthy integration and well-being of our newest neighbors as they start their lives in the United States.

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ZOMI COMMUNITY

The Zomi are a Christian ethnic minority group from Myanmar, Bangladesh, and India. Intense religious persecution in Myanmar has caused the resettlement of many Zomi to Portland as refugees.

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TO: City of Brookings Planning Commission

Date: June 23, 2023

Re: In the matter of File No. APP-1-23, an appeal to the Planning Commission of a Notice of Abatement issued April 14, 2023 to St. Timothy's Episcopal Church (Note: Public Comment Form attached)

=====

My name is Kathleen Dickson, and I'm the music director at Smith River United Methodist Church, located about 15 miles from Brookings in California.

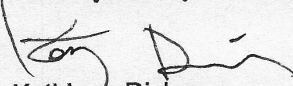
While my congregation is very small, we follow the same Christian tenets that St. Tim's does, and our social service ministry reflects that, I believe. As part of that ministry:

1. We offer a clothes closet for anyone who needs a warm coat, or a decent set of clothes for a job interview, or thick socks to help keep one's feet healthy.
2. We have a weekly food pantry - open for folks both within the community or just passing through - and do our best to keep it stocked with easy to use, shelf-stable foods.
3. We are the Smith River location for both the Del Norte County Food Bank and the Family Resource Council's produce distribution program (Pacific North Fresh Mobile Market), both of whom set up at our church for monthly distributions to the community.
4. We host a full after-church meal on Sundays that's free and open to the public.
5. We have been hosting the Monday community meal at St. Tim's since June, 2021. We host this meal at St. Tim's - rather than in Smith River - in order to reach as many hungry souls within our Wild Rivers Coast region as we can.
6. We are in the process of making space available in our church to True North, a local non-profit, so that they can increase their outreach within northern Del Norte county (this newest social service program should be up and running sometime in July.)

The Bible says: "What good is it, my brothers, if someone says he has faith but does not have works? Can that faith save him? If a brother or sister is poorly clothed and lacking in daily food, and one of you says to them, "Go in peace, be warmed and filled," without giving them the things needed for the body, what good is that? So also faith by itself, if it does not have works, is dead." James 2: 14-17.

Our mission as Methodists is built on the premise that "faith, without works, is dead", and the above ministries reflect this mission. Our denomination's "brand", if you will, is "Open Hearts, Open Minds, Open Doors", which truly reflects our grace-based theology and propels us to serve our neighbor, whoever that may be.

Thank you for your time,



Kathleen Dickson

Curry County resident and member of the Smith River United Methodist Church
18821 Montbretia Lane, Brookings, OR 97415 * 541-661-1385

RE: File No. APP-1-23

Brookings Planning Commissioners,

I submit these comments both as a professional urban planner as well as an Episcopalian. I believe my perspective as both a planner and a Christian could potentially be useful in assisting your decision making on this file.

While I wholeheartedly support the important role of development regulations in managing how land is used, it is important in this case to take a step back and see this issue from a broader perspective.

The field of urban planning as we practice it in the US today was borne out of the public health movement during the Industrial Revolution. Early planners recognized that land use regulations were needed in order to protect the wellbeing of those living in extreme poverty. Some of the first of these regulations included zoning residential uses away from industrial uses, requiring windows in tenements, and making space for dedicated parkland.

Urban planning began because of the need to protect and support vulnerable people.

Additionally, the professional code of ethics as adopted by the American Planning Association is clear: As planners, we should use our positions to advance social equity, including advocating for policies and programs that support upward economic mobility.

As a Christian, I believe it is the highest calling of the church to serve those in need. To argue that the purpose of a church should be so narrowly prescribed as to only include worship services is fundamentally antithetical to the values and practices of Episcopalians. We are not a Sunday-morning-in-the-pew only faith. Directly addressing domestic poverty is a key ministry of the Episcopal church, and to deny our ability to do that is to deny our right to religious freedom.

I will repeat that because it deserves emphasis: to deny us our ability to practice our faith by acting on what we believe is to deny us religious liberty.

Episcopalians, as part of our Anglican tradition, use the Book of Common Prayer as a tool to guide our worship practices. Among the Prayers and Thanksgivings section of the BCP are two prayers I would like to include in my comments here.

35. For the Poor and Neglected

Almighty and most merciful God, we remember before you all poor and neglected persons whom it would be easy for us to forget: the homeless and the destitute, the old and the sick,

and all who have none to care for them. Help us to heal those who are broken in body or spirit, and to turn their sorrow into joy. Grant this, Father, for the love of your Son, who for our sake became poor, Jesus Christ our Lord. Amen.

23. For Local Government

Almighty God our heavenly Father, send down upon those who hold office in Brookings the spirit of wisdom, charity, and justice; that with steadfast purpose they may faithfully serve in their offices to promote the well-being of all people; through Jesus Christ our Lord. Amen.

Sincerely,

Shelley Denison, MPA, MCRP, AICP



Crescent City United Methodist Church
664 H Street
Crescent City, CA 95531

June 23, 2023

To Whom it May Concern:

Grace and Peace to you all, I pray this email finds you all well.

My name is Rev. Dana Gill, and I am the Pastor of both Crescent City United Methodist Church (CCUMC) as well as Smith River United Methodist Church (SRUMC), though I write to you today representing our CCUMC community of faith.

CCUMC is a small but vital congregation that has committed to serving the Del Norte community in a way that mimics Jesus. A few years ago, we recommitted to our missional services as a church, and updated our local church's Mission Statement to read, "Like Jesus, we love, accept, and care for those in our community in innovative ways." And care for our community we have!

- Since then, we have continued our Safe Space ministry which serves anyone who attends on Friday nights. We offer social time to just be, to plug in and recharge phones or (re)connect, fill their bellies, warm up, find a change of clothes, or use the bathrooms. This specific ministry is geared towards bringing together queer and straight, neurodivergent and neurotypical, able bodied and disabled, and we all do it while being together in community who love and respect one another as whole children of God. Under this Safe Space ministry umbrella, we also offer peer-to-peer support groups for Women and female-presenting folks.
- We offer up our facilities for to-go meals, bathrooms, or just a warm place to rest and regroup while we are open during the day, every weekday from 10am to noon.
- We pack and offer brown bag lunches for those using Del Norte Mission Possible's Shower Program on Tuesday mornings, and were the pioneers of this initial program.
- We offer sliding scale (all the way to free) dance lessons to the community, and soon we will be offering them to the youth as part of a free school-to-career pathway program for the "Promise Neighborhoods" community development, because we believe that healthy bodies and healthy minds are just as important as physical and social needs of folks.
- We offer our facilities to NA and AA groups to work towards their recovery as they seek wholeness and wellness as beloved children of God.
- We offer a free back to school fair to the larger community, focusing on services and supplies for homeless and foster youth, though they are available to anyone who comes to us and asks.

As United Methodists, our General Church Rules that we must always adhere to (and included in the vows I made upon my ordination) state simply: 1) Do No Harm 2) Do Good 3) Stay in love with God. We can do our best to do those things individually, but to do all of those three things together, in tandem, is a much more difficult feat yet it is what our faith requires of us. If we were unable to provide these services to all of God's children, our faith would be lackluster and nominal at best, because our faith, without works, is dead (James 2:26).

Yours in Christ,
Rev. Dana Gill

Dear Brookings Planning Commission,

My name is Emily Ronsberg, and I serve as the Intern Pastor at Gloria Dei Lutheran Church in Coos Bay, OR. I write here in support of the matter of File No. APP-1-23, an appeal to the Planning Commission of a Notice of Abatement issued April 14, 2023 to St. Timothy's Episcopal Church.

With the exception of one parcel next door to Gloria Dei's church building that was recently rezoned from small lot residential to mixed use in order to build affordable housing (land that is being sold by the church to Northwest Housing Alternatives for that express purpose), **both Gloria Dei's physical church building and the neighborhood surrounding the church is zoned small lot residential.**

In the course of our everyday, normal ministry, we routinely engage in work that could be called social services. We see this work as grounded in our Christian belief that God calls us to care for our community in physical, embodied ways. We encounter God's presence with the community members that we assist, and that makes this work worshipful for us. For what is worship if not an encounter with the God of the universe? Therefore, these kinds of social services cannot be separated from how we live out our faith in the world. **We are greatly concerned that any governmental body would limit the expression of our faith by preventing us from loving our neighbors through acts of charitable hospitality.**

It is not uncommon for various community members to seek assistance with us throughout the week for support in getting their basic needs met. Our current faithfully offered social services include but are not limited to:

- bags of food given to the hungry
- a place to charge electronics
- bathrooms available when the office is open, 9am-4pm Monday-Friday
- pastoral care staff present daily
- a pastor's discretionary fund used to financially assist community members in need
- monthly free meals for the community, and
- referrals to other community organizations or congregations that offer different social services than Gloria Dei does

Additionally, Gloria Dei is involved with a local congregational group in Coos Bay and North Bend consisting of two Lutheran congregations, one Methodist congregation, one Presbyterian congregation, and one Episcopal congregation who have banded together to pool our financial and physical resources to offer more robust support to community members in need. **This practice of churches caring for people in embodied ways is not one Gloria Dei Lutheran Church or St. Timothy's Episcopal Church are alone in doing.**

For the sake of your community members and neighbors in need, and St. Timothy's care for them as part and parcel of what it means to be a church engaged with the world, I urge you to move in support of St. Timothy's appeal of the Notice of Abatement.

In Christ,



Intern Pastor Emily Ronsberg

Gloria Dei Lutheran Church
1290 Thompson Rd
Coos Bay, OR 97420

June 27, 2023 Testimony for Planning Commission hearing

Hello, my name is Deacon Linda Lee

The very core of Christian ministry at St. Timothy's Episcopal Church is building relationship and in particular, with those who are in need. One of those many significant relationships have to do with a woman who grew up here in Brookings and is still a resident. She had been coming to the church regarding her need for companionship and shelter as well as due to the chronic pain she had been suffering. This is when I met her late last summer. It was very clear that her status within the community was a hinderance to her getting proper and adequate ongoing medical care. Through my relationship with St. Timothy's Church, she has had a volunteer to be her medical advocate for her every single week since the fall of 2022 when the diagnosis of a life-threatening cancer was given. The threat to her life was great and was going to require multiple 4-day chemotherapy sessions in the hospital at OHSU with surgery to follow. Her medical team was large and complicated. Issues around her housing, transportation, and emotional support were ongoing. Her prognosis was very dire, and rehabilitation from extensive surgery problematic. Today she is tumor free and on the road to full recovery. And due to St. Timothy's presence in the community to represent her needs she is now in her own home for the first time in

years. It is building relationship with those in crisis that makes all the difference. It is St. Timothy's Episcopal Church presence in this community that has made this kind of stability and healing possible. This is just one example of what the people connected to this church do because we are called by our baptism to follow Jesus and serve God's people.

And for me personally, this is part of my ordination vows as a deacon.

Deacons are expected to be an example of service in the church and to uphold the acts of mercy and justice. We all know poverty, weakness, sickness, and loneliness are global conditions. The focus of the ministry of an ordained deacon in the Church worldwide is right out of scripture readings which have existed since the Apostle Luke wrote about this in the Book of Acts. Included are teachings about deacons ministering to those in need as well as the work of seeking out the causes of oppression. Out of this service of mercy flows concerns for justice. The Church worldwide focuses on this need for Christian service and as an ordained minister of the Church this is why am associated with St. Timothy's Episcopal Church...they more than many are doing this necessary work within the community.

As to what is a Church. It is folly to think one can worship God only from the church sanctuary, participating in the prayers only, and praising the God in heaven while you turn away from God's children here on earth who are in deep need and may even be

unsheltered. Pure folly. Scripture reminds us we are to look for God among the vulnerable, the weary, the traveler, the lonely and the stranger.

Because this Abatement document purports to knowledge of what a Christian Church is created for then I must assume you understand the portion of the New Testament called Matthew 25 where Jesus teaches his disciples about the importance of loving and serving others as if they were serving Jesus himself

As followers of Jesus, we have a choice: We can respond to unsettling realities in fear and withdraw or we can follow Him in responding to the greatest needs of our day with compassion, mercy, love, and with hope. Jesus could not have been clearer – that a warm welcome to a stranger, one in need is nothing less than an act of worship.

This is the foundational part of the Christian faith...to be outwardly oriented towards those in the midst of a crisis.

The Church is where I live out my Baptismal promises as well as my Ordination vows. The Church is where I would connect with and join with others to help those in need. Christianity is also based on the sharing of alms. The deacons share in this activity of giving away a portion of the church's donated resources to those who do not have enough. In scriptures again and again we read that the care of the poor and oppressed was a central feather of Jesus's ministry alongside the proclamation of the Good News which was that God is Love. Ironically given the nature of today's

meeting, Jesus's teaching was also challenged by the Temple authorities regarding the story of the Good Samaritan. Jesus commended the one who answered correctly regarding the appropriate action of the those in that story...The answer was," The one who showed mercy". Luke 10:36-37. Throughout the Bible, mercy is linked with worship.

Isaiah 61:1-2 with Luke 4:18 Out of this service of mercy flows concerns for justice.

Thank you for your time.

846 words = 5 minutes

Public Comment Form

I would like to comment on : June 27th, 2023 Planning Commission Meeting

Agenda Item #: 4.2 IN SUPPORT OF

Item Title: In the matter of File No. APP-1-23, an appeal to the Planning Commission of a Notice of Abatement issued April 14, 2023 to St. Timothy's Episcopal Church

Name: Rebeca Malmgren, Evangelical Lutheran Church in America, Coordinator of Economic Diversity

Address:

Work: 8765 W. Higgins Rd., Chicago, IL 60631

Home: 8214 Sierra Woods Ct. Carpentersville, IL 60110

Organization: Evangelical Lutheran Church in America

Phone: 765-413-4521

Dear Planning Commission,

I work for the Evangelical Lutheran Church in America as the Coordinator of Economic Diversity. My position exists in part for supporting, promoting growth and resourcing of places like St. Timothy's.

For your awareness, the ELCA and Episcopal Church have been in full communion for over 20 years, on the basis of a shared ministry in the historic episcopate and for the sake of common mission in proclaiming and serving the gospel.

There are hundreds of worshipping communities that serve in marginalized communities AND offer justice and equity programs. They are in all 50 states and are a crucial part of the ELCA, it is a core part of Lutheran identity/faith and practice. We believe that the ELCA is called to foster and facilitate the ELCA's engagement in service with and among communities, globally and locally, and to promote efforts to call and act for justice. Part of this work is done by engaging systems and processes in the public square and seeking a more robust, just and equitable response to the many hardships affecting the communities where we live and serve. Most of our work happens as we support the free course of the gospel of Jesus Christ in the world and the freedom of Christians to love and serve their neighbor... This is the way of Jesus, a deep, passionate and extravagant love that leads to restored relationships and transformed communities. We seek to activate people so that this world may experience community, justice and love.

Furthermore, it is an honor of mine to care for and coordinate a highly valued group, the ELCA Homeless and Justice Network, Rev. Sr. Cora Rose and St. Timothy's are part of this network. The HJN is an Ecumenical (many different denominations are included, Episcopal, United Church of Christ, Presbyterian etc...) network of churches that all have worshipping communities AND justice initiatives that they coordinate and advocate for. This includes food ministries, community meals, community gardens, shelters, prison recovery/re-entry, affordable housing...the list goes on and on. The Homeless and Justice Network spans across the whole county, West Coast to East Coast. While each individual location is special, St. Timothy's is not alone in this work. In fact, of the ELCA churches that are working with and among marginalized communities, about 62% have some type of food ministry and community meal.

The ELCA equips local congregations in ministries of justice and service, because these ministries and values are core to our faith and practice, who we understand God to be, and what God's call is on our life together. The church isn't just a building, the Church is without walls with practices completely interwoven into our life of worship AND discipleship; they are not separable.

The abatement issue against St. Timothy's should be dismissed so that it can continue to do this important work in their community.

Rebeca Malmgren

Rebeca Malmgren

Coordinator for Economic Diversity

ELCA Homeless and Justice Network

Congregational Vitality

Evangelical Lutheran Church in America

8765 W. Higgins Road, Chicago, IL 0631-4101

rebeca.malmgren@elca.org

June 26, 2023

Lauri Ziemer
Planning Tech
lziemer@brookings.or.us

Dear Laurie,

Blessings as you breathe in the gift of these summer days.

For 139 years women in our Community, The Deaconess Community of the ELCA, have faithfully responded to Christ's call to love our neighbor – *I give you a new commandment, that you love one another. Just as I have loved you, you also should love one another.* John 13:34
As deacons in the Evangelical Lutheran Church in America (ELCA) and the Evangelical Lutheran Church in Canada (ELCIC) we have responded to this call for centuries – serving at the intersection of church and society.

This ministry, for which we are formally educated, formed, and ordained by our denomination to carry out, is compelled by the love of Christ and motivated by Christ's teaching, as we read in Matthew 25 -

³⁷ Then the righteous will answer him, 'Lord, when was it that we saw you hungry and gave you food or thirsty and gave you something to drink? ³⁸ And when was it that we saw you a stranger and welcomed you or naked and gave you clothing? ³⁹ And when was it that we saw you sick or in prison and visited you?' ⁴⁰ And the king will answer them, 'Truly I tell you, just as you did it to one of the least of these brothers and sisters of mine, you did it to me.'

We give thanks for the ministry of Sister Cora Rose, a member of our Community, as she serves with St. Timothy's Episcopal Church in Brookings in responding to Christ's call to love our neighbors. This ministry of service to the vulnerable and marginalized is found in the work of congregations across the United States and in Canada.

Like Sister Cora, our Sisters and ministry partners work with their members in listening and responding to their neighbors needs through regular worship, education, and providing social service resources in food and clothing pantries, child-care, health clinics, shelters and programing for the unhoused –providing showers, computer stations, advocay, washing machines, etc. The ministries to poor and low-wealth neighbors are found in congregations across the continent. While **100% of our Community** has always served, and continues to serve in ministries to and with the vulnerable and marginalized, we celebrate the ministries of all congregations (a few named below) that work faithfully, like St. Timothy's to live Matthew 25 – the call of the church:

Bethlehem Lutheran Church – New Orleans, LA – Community Table: Meals/Housing/Education
Trinity Lutheran Church – New York, NY – Trinity Connection: Meals/Housing/Advocacy
Immanuel Lutheran Church – Jackson, MI – Refugee Social Services

The Well – Philadelphia, PA - Women's Shelter/Meals/Education/Advocacy
Cathedral in the Night – Amherst, MA: Meals/Housing/Advocacy
Gathering Table – Kansas City, MO: Meals/Housing/Education/Advocacy
St. John Lutheran Church – Marion, TX: Meals provided to schools through the church
St. Paul Lutheran Church – Carlisle, PA: Refugee Social Services/Housing

As Jesus fed the 5000 and called us to feed the hungry, clothe the naked, welcome the stranger, and wash the feet of our neighbor, deacons in the church have responded to this call with a loud Amen and Yes, with the help of God! The congregations in which we serve partner in this ministry to create bridges as the gospel is celebrated and all of God's creation has the chance to flourish. This is not a new ministry. For centuries we have been calling on God's mercy, grace, hope and love as we faithfully serve with our neighbors.

This is church – compelled by the love of Christ! Motivated by the love of Christ, our Community prays with you as you listen with your neighbors and respond.

Compelled by the love of Christ,
Sister Noreen

Sister Noreen Stevens
Directing Deaconess
651.815.1145

June 25, 2023

My name is Pastor Jon Myers, and I serve the closest ELCA Lutheran church in Oregon to Brookings. The ELCA is the largest Lutheran denomination in the United States, and many ELCA congregations partner with Episcopalians in a variety of ministries. The congregation I lead, Calvary, has several programs of its own that would best be described as “social ministries,” or which serve significant numbers of people outside our membership.

For example, Calvary has a discretionary account used to help people in need who come to our door looking for assistance. We also recently budgeted for a project to create “Blessing Bags” to meet other needs in the community. We serve a monthly meal that is open to anyone in our community, and an integral part of my work is on-site pastoral counseling with anyone who requests it, not just Calvary members.

All ELCA Lutheran congregations are charged by their governing documents “to meet human needs, caring for the sick and the aged, advocating dignity, justice, and equity for all people.” This is as integral to expressing our faith as anything that happens during Sunday worship. Similarly all pastors in my tradition are charged “to speak publicly to the world in solidarity with the poor and oppressed, advocating dignity, justice, and equity for all people.”

And each ELCA Lutheran pastor takes a vow at our ordination to “give faithful witness in the world through word and deed, that God’s love may be known in all that [we] do”—not just in how we lead worship on Sunday mornings. I took this vow, among several others, and I will always advocate for my colleagues, including Episcopal priests and Lutheran deacons, that they may be able to fulfill theirs.

Pastor Jon Myers
Calvary Lutheran Church

From: Karen Pringle Cunningham [mailto:kappy.kp@gmail.com]
Sent: Tuesday, June 27, 2023 5:50 PM
To: LZierner@brookings.or.us
Subject: Public Comment Item #4.2

Here are my comments for tonight's meeting.

Karen Pringle Cunningham

To the Brookings Planning Commission June 27, 2023:

My name is Karen Pringle Cunningham and I live in Brookings Oregon. I worked my way up from Assistant Planner to Planner II in Missoula City and County Planning Department in the 1980s to mid 1990s. My education was a BA in Geography and Land Use Planning and I continued in this field of study with the American Planning Association. Later I submitted Community Economic Development Plans for five different counties in Montana, necessary for communities to establish Small Business Development centers and qualify for state and Federal grants.

I am retired and a grandmother now but one with relevant experience to talk to you about the foundational principles of the Planning Commission laid out in the Oregon Planning Commissioner Handbook of 2015. I want to call your attention to the principles that I don't see addressed as they should be in the staff report.

From the Oregon Planning Commissioner Handbook 2015

"Purpose of the Goals: Development and Preservation

Taken as a whole, the goals are best understood as devoted to creating and maintaining sustainable, livable, and equitable communities.

The overall principle of the Planning Commission is to provide for the public's health, safety, and welfare. Each community defines this separately and it changes as time progresses, but it is this mandate from the federal and state constitutions that creates the basis for planning and related activities."

Look at this next principle in your foundational documents:

"Assure that a long-term perspective is taken in the decisions: It is not easy to remember that decisions must be made with those not at the hearing and those yet unborn in mind, as well as the applicant. It is the combination of good process with good values that will lay the foundation for good planning in your community."

All of this is to say the role of the planning commission is to take into account the larger public good. The benevolent activity which is the mission of the church is not only a basic public good but foundational to the church, that is providing fish (meals, showers, laundry) as well as teaching people how to fish (through advocacy.)

St Timothy's is providing a public good through gifts, grants and volunteers that the local government is unable or not inclined to provide. They are a resource for public well-being. Why would anyone want to penalize them for gathering people and resources to deal with problems of poverty whether that poverty is situational (loss of a job or ill health) which can happen to anyone of us, or intergenerational poverty, which requires a different set of ministerial activities.

You know the metaphor of “why do we have to catch people drowning in the river downstream when we can keep them from falling into distress up river.” This is the role of St. Timothy’s ministries, to do both.

The recommendation to curtail or reduce the mission of the church is like saying we can only help the needy if you fall into the river on Monday and Tuesday, and we can’t give you the kind of help you need because local planning commission recommended limitations. And what are those limitations based upon?

It is in Brookings public interest that the church helps people reunite with their families; to help a person or family find the medical care they need, a job, a home.

Consider the planning principles outlined in the Planning Commission Handbook:

Prepare for the future... *St Timothy’s is helping the community prepare for the future. Imagine where we would be if they had not stepped forward to provide testing and vaccination services as well as the stay at home wrap around services at the height of the epidemic.*

Anticipate change... *St Timothy’s anticipated the needs and gathered together the qualified professionals and volunteers.*

Maximize community strengths... *St Timothy’s is leveraging benefits for those in need and for the community. Helping people help themselves.*

Minimize community weaknesses. *St. Timothy’s is helping to overcome local deficiencies in service for those in need.*

Protect scarce resources... *St. Timothy’s is a scarce resource that is benefiting the public’s interest in a livable community.*

Consider the future of Brookings without these basic ministries from St. Timothy’s.

In establishing the evidence for you to make a decision in this case, the staff report is silent on the public interest and limited to technical remarks which are at times inconclusive and the tone adversarial.

The staff report lacks the long term perspective and does not address the very planning principles and goals found in your foundational documents, the principles from which you operate.

I recommend you support St Timothy’s appeal and withdraw the Notice of Abatement issued to St. Timothy’s and recognize them as an essential ministerial organization that makes our community sustainable, livable and equitable.

Info from Public Comment Form:

*Karen Cunningham
520 Redwood Street
Brookings, OR 97415*

July 4, 2023

VIA EMAIL

Planning Commission
Attn: Lauri Ziemer
City of Brookings
898 Elk Drive,
Brookings, OR 97415

Re: Second Evidentiary Submission in Support of St. Timothy's Church Appeal of the April 14, 2023, Notice to Abate.

Dear Planning Commission Members:

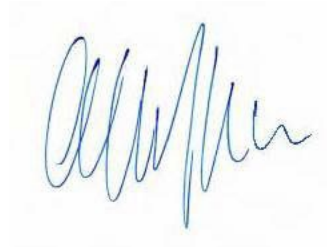
This office represents St. Timothy's Episcopal Church ("St. Tim's") in the above referenced matter. St Tim's operates a church use ("Church") at the subject property at 401 Fir Street ("Property"). St. Tim's received a Notice to Abate issued by the City of Brookings (the "City") on April 14, 2023. Prior to the City of Brookings Planning Commission Meeting on June 27th, we submitted a packet of evidence on St. Tim's for the Planning Commissions review.

During the public hearing, we requested that the record be kept open for an additional 7 days and for the opportunity to submit final legal argument. Accordingly, the record will be kept open for all parties to submit additional evidence until July 4, 2023, with the deadline for rebuttal evidence (all parties) on July 11, 2023, and the deadline for final legal argument by the St. Tim's on July 18, 2023.

Please find the following documents attached for submittal to the record.

- On the issue of the Church's non-conforming use
 - o Letter from Father Bernie dated July 3, 2023
- On the issue of "typical" church uses
 - o Written testimony from Deacon Linda Lee (presented orally at the public commission hearing)

Very truly yours,

A handwritten signature in blue ink, appearing to read "Allison J. Reynolds". The signature is written in a cursive style with a large initial "A" and "J".

Allison J. Reynolds

July 3, 2023

Via Email

Planning Commission
Attn: Lauri Ziemer
City of Brookings
898 Elk Drive
Brookings, OR 97415

**Re: Evidence in Support of St. Timothy's Episcopal Church Appeal of April 14, 2023,
Notice to Abate.**

Dear Planning Commission Members:

I am the Reverend Bernie Lindley, the vicar of St. Timothy's Episcopal Church here in Brookings. This letter supplements the letter I sent on July 27, 2023. In this letter, I would like to provide additional evidence of a continuous conditional use at the Church with regards to the "social services" mentioned in the Notice to Abate.

Pre-1989 Uses:

The City agrees that because St. Tim's use of the church pre-dates the Brookings Code (which was adopted in 1989), the St. Tim's has 'de facto' conditional use rights. This is my knowledge about church operations at the site prior to 1989.

In 1981, St. Tim's began a major addition to the church building. It was completed in 1982. This project doubled the size of the building, adding the current parish hall and kitchen downstairs, as well as the addition upstairs of two offices, the parish library, the sacristy, and two bathrooms, one of which had a shower installed during the building project. That shower was put in for the purpose of being used by non-church members and has been used by non-church members ever since.

In 1984, we started hosting the Food Bank in our old parish hall (the basement of the original church building, directly under the worship space). The Food Bank stayed in our building until about 2004 or 2005 when they relocated to a larger space. I do not know how many people were served each week, but they were, to my recollection, all low-income folks, and included both housed and un-housed individuals.

Also, between 1980-1987, our vicar, Fr. Tom, had a discretionary fund that he used for alms for the poor. The vicars at St. Tim's have never had a practice of telling anyone to whom we distribute our alms, so I am not sure what exactly that fund was used for between 1980-87. It is not something we specifically report or take a financial tally of because we want to respect the privacy of the individuals we provide alms to. However, I am certain that such services were provided because when I was sorting through old church files several years ago (well before the COVID-19 pandemic), I discovered records of checks written in this period. Because of the

amount of time that had passed and to protect the privacy of the individuals we provided alms to, I recycled those records at the time.

Pre-1999 Uses:

St. Tim's applied for a conditional use permit to expand the church building in 1999, which was granted by the City. As the City recognizes, that amended conditional use permit also authorized the church's use as it was occurring in 1999. This is my knowledge about church operations at the site between 1989 and 1999.

In 1999 we started a project to expand the worship space upstairs to accommodate growth in the Sunday attendance. I filled out the amendment to an existing conditional use application that is attached to the staff report.

During the 1990s, we were still doing the food bank and almsgiving. I cannot remember what other outreach ministries we had on the church grounds at that time. But homeless people would often join us in the church library for Wednesday Bible studies. They would be offered a cup of coffee as well as other hospitable things, even tents and sleeping bags. Father Bill handled most of that. In addition, the Church office hours we provide today were the same as in the 1990s – Monday, Wednesday and Friday from 9 to noon. The same activities occurred – people were able to use the shower, have fellowship with others, and receive advice on a range of topics. Many people would come in for alms during office hours just like they do today. I saw them and Father Bill would mention it to me occasionally (since he was in charge of providing alms at that time).

The Church is the only place the un-housed can go.

Some of the testimony at the meeting on June 27 raised concerns about safety and security in the areas surrounding the church. We do not permit un-housed folks to sleep at the church (we have in the past had special permits for certain situations but those are not active at the moment). However, the church is near Azalea Park and this is an area where un-housed people tend to find rest. We do not encourage people sleep or congregate in Azalea Park, but—like the rest of this town—we are aware that it occurs.

Un-housed folks utilize Azalea Park because it contains one of the only public bathrooms. The bathrooms at the other City parks are kept locked, as well as the bathroom near Mill Beach. We do not ask people who come to St. Tim's for office hours where they are sleeping or if they are utilizing Azalea Park, so we are not able to provide data about whether the people we serve during office hours are un-housed. However, we do know that at least 10-15% of the people who come to the church during office hours are housed because they are looking for help with rent and utilities related to their housing. Our purpose is to assist anyone who comes in our doors, regardless of their circumstances.

Even if people who are un-housed and stay in Azalea Park are visiting the church, the impact on the neighborhood from their visits to the church is minimal because those individuals would not have to walk through the residential area to access the Church. As the vicinity map shows, individuals in Azalea Park would only need to cross Old Country Road where it intersects Fir Street to access the church.

Thank you for your time.

Bernie Lindberg

For: Agenda Item #4.2 in support of Appeal -File #APP-1-23 Notice of Abatement
June 27, 2023, Testimony for Brookings Planning Commission Hearing
Reverend Linda Lee with St. Timothy's Episcopal Church
Po Box 7174 Brookings, Or. 97415 (503) 309-9083

Hello, my name is Deacon Linda Lee

The very core of Christian ministry at St. Timothy's Episcopal Church is building relationships and in particular, with those who are in need. One of those many significant relationships have to do with a woman who grew up here in Brookings and is still a resident. She had been coming to the church regarding her need for companionship and shelter as well as due to the chronic pain she had been suffering. This is when I met her late last summer. It was very clear that her status within the community was a hinderance to her getting proper and adequate ongoing medical care. Through my relationship with St. Timothy's Church, she has had a volunteer to be her medical advocate every single week since the fall of 2022 when the diagnosis of a life-threatening cancer was given. The threat to her life was great and was going to require multiple 4-day chemotherapy sessions in the hospital at OHSU with surgery to follow. Her medical team was large and complicated. Issues around her housing, transportation, and emotional support were ongoing. Her prognosis was very dire, and rehabilitation from extensive surgery problematic. Today she is tumor free and on the road to full recovery. And due to St. Timothy's presence in the community to represent her needs she is now in her own home for the first time in years. It is building relationship with those in crisis that makes all the difference. It is St. Timothy's Episcopal Church presence in this community that has made this kind of stability and healing possible. This is just one example of what the people connected to this church do because we are called by our baptism to follow Jesus and serve God's people.

And for me personally, this is part of my ordination vows as a deacon. Deacons are expected to be an example of service in the church and to uphold the acts of mercy and justice. We all know poverty, weakness, sickness, and loneliness are global conditions. The focus of the ministry of an ordained deacon in the Church worldwide is right out of scripture readings which have existed since the Apostle Luke wrote about this in The Book of Acts. Included are teachings about deacons ministering to those in need as well as the work of seeking out the causes of oppression.

Out of this service of mercy flows concerns for justice. The Church worldwide focuses on this need for Christian service and as an ordained minister of the Church this is why am associated with St. Timothy's Episcopal Church...they more than many are doing this necessary work within the community.

As to what is a Church: it is folly to think one can worship God only from the church sanctuary, participating in the prayers only, and praising the God in heaven while you turn away from God's children here on earth who are in deep need and may even be unsheltered. Pure folly. Scripture reminds us we are to look for God among the vulnerable, the weary, the traveler, the lonely and the stranger. Because this Abatement document purports to knowledge of what a Christian Church is created for then I must assume you understand the portion of the New Testament called Matthew 25 where Jesus teaches his disciples about the importance of loving and serving others as if they were serving Jesus himself

As followers of Jesus, we have a choice: We can respond to unsettling realities in fear and withdraw or we can follow Him in responding to the greatest needs of our day with compassion, mercy, love, and with hope. Jesus could not have been clearer – that a warm welcome to a stranger, one in need, is nothing less than an act of worship. This is the foundational part of the Christian faith...to be outwardly oriented towards those in the midst of a crisis.

The Church is where I live out my Baptismal promises as well as my Ordination vows. The Church is where I would connect with and join with others to help those in need. Christianity is also based on the sharing of alms. The deacons share in this activity of giving away a portion of the church's donated resources to those who do not have enough. In scriptures again and again we read that the care of the poor and oppressed was a central feature of Jesus's ministry alongside the proclamation of the Good News which was that God is Love. Ironically given the nature of today's meeting, Jesus's teaching was also challenged by the Temple authorities regarding the story of the Good Samaritan. Jesus commended the one who answered correctly regarding the appropriate action of the those in that story...The answer was," The one who showed mercy". Throughout the Bible, mercy is linked with worship. Out of this service of mercy flows concerns for justice. Thank you for your time and may God bless you.

July 18, 2023

VIA EMAIL

Planning Commission
Attn: Lauri Ziemer
City of Brookings
898 Elk Drive,
Brookings, OR 97415

Re: Final Legal Argument in Support of St. Timothy's Church Appeal of the April 14, 2023, Notice to Abate.

Dear Planning Commission Members:

This office represents St. Timothy's Episcopal Church ("St. Tim's") in the above referenced matter. St. Tim's operates a church use ("Church") at the subject property at 401 Fir Street ("Property"). St. Tim's received a Notice to Abate issued by the City of Brookings (the "City") on April 14, 2023. During the public hearing, we requested and received the opportunity to submit final legal argument.

Introduction

The City's Notice to Abate ("Notice") does not identify any actual harms or impacts from St. Tim's operations at the Property on the surrounding community. Even the testimony in support of the Notice (opposing the appeal), recognized that restricting St. Tim's religious activities rather than addressing purported impacts (of which there is no evidence in the record), was inappropriate and seemed confusing. City staff interprets the Brookings Municipal Code ("BMC"), which allows a "church" in residential zones, to mean that only church "worship" activities (which staff argues include only prayer and sermons) are authorized or can be authorized, while any other activities are not an allowed aspect of church use. This is an absurdly narrow interpretation of the term "church" that unduly restricts religious practice. Staff seems to imply that this narrow definition of "church" applies only in residential zones, but fails to recognize that a "church" use is authorized only in the City's residential zones, and there are

not any zones in the City that allow both “church” and “social services” where a church could practice its faith through service to the poor.¹ Staff’s interpretation prohibits churches in Brookings from providing services to the poor as part of their church use, City-wide. The Notice does not identify any interest, much less a compelling interest, that the City is attempting to serve by imposing these restrictions. The City must interpret its code consistent with state and federal law which protect religious practice from arbitrary restrictions and allow the free exercise of religion.

People have organized to practice their faith for centuries, while zoning restrictions are a fairly recent development. The situation the City faces here is common: a church, established long before City zoning regulations, has a right to continue operating but the parameters of the use are not clear in the way a decision to establish a same church use today might be. To determine if the Notice is valid, the Planning Commission must first determine what a “church” use, which St. Tim’s has the undisputed right to continue at the Property, encompasses. This term is not defined in the BMC, so is a matter of interpretation. We argue and the evidence in the record shows that “church” use includes worship through service to the poor in the manner provided by St. Tim’s. If a church use under the BMC includes services to the poor, the inquiry ends there since St. Tim’s is authorized to conduct a church use at the Property. The record includes overwhelming evidence that a “church” use includes the types of religious services cited in the Notice.

However, if the Planning Commission determines that the activities that St. Tim’s engages in are *beyond* the scope of “church” use under the Code (and “church” does not include services to the poor), whether St. Tim’s has the right to continue its specific activities depends on whether St. Tim’s de facto or specifically granted conditional use permit authorizes these activities. The evidence in the record shows that St. Tim’s has provided services to the poor since its establishment under its de facto conditional use permit. The City reauthorized St. Tim’s use and allowed an expansion in 1999. St. Tim’s service to the poor prior to 1999 are very similar to the services it provides today and have continue since the time the Church expansion was authorized by the 1999 conditional use permit. Even if the Planning Commission determines that “church” as defined in the BMC does not encompass some of St. Tim’s service to the poor, St. Tim’s has a legal right to continue its service activities because these are authorized by its de facto conditional use permit and reauthorized by the 1999 conditional use permit.

Argument

¹ We note that “places of worship” (also not a defined term) is an allowed use in the certain commercial zones, but “social services” (also not a defined term) is not an allowed use in any of these zones.

The City receives significant deference to plausible interpretation of provisions of its own code and so long as the interpretation is not contrary to law.² An interpretation is plausible when the City interprets the term consistently with its expressed language and purpose or underlying policy.³ Even if an interpretation is plausible, that interpretation cannot be contrary to state and federal law.⁴

A. St. Tim’s service ministries are a facet of typical “church” use and an expected part of the use that a church would conduct on its property. The City’s interpretation of “church” use must include these service ministry components.

The staff report urges this Commission to adopt an unreasonably narrow definition of “church” use that is clearly contrary to the general understanding of what a “church” use typically involves or could involve. The record clearly establishes that service to the poor, also known as almsgiving, is a central tenant of Christian faith. Typical church activities *also* include weekly hours when a church opens its doors to the community for fellowship and counseling.

The Staff Report concludes that a church use only includes “worship,” not any other religious activities, and then chooses to narrowly define “worship” (also undefined in the BMC) to include only sermons and pray activity. Other definitions of worship are broader and include the service ministries performed by St. Tim’s. Merriam-Webster also defines worship as an act that honors or shows reverence for a divine being.⁵ This definition is more consistent with other dictionaries and common conceptions of the duties of a church in performing worship than the definition selected by staff. As another example, Black’s Law Dictionary defines public worship as “[w]orship conducted by a religious society according to the society’s system of ecclesiastical authority, ritual propriety, and rules and regulations.”⁶ This broad definition captures both

² *Siporen v. City of Medford*, 349 Or 247, 261, 243 P3d 776 (2010); *Estroff v. City of Dundee*, 79 Or LUBA 189, 192-93 (2019).

³ *Klein v. Lane County*, 80 Or LUBA 287, 290 (2019); *id.*

⁴ U.S. Const., Art. VI; *Klein*, 80 Or LUBA at 290.

⁵ Merriam-Webster, *Worship*, <https://www.merriam-webster.com/dictionary/worship> (July 12, 2023); *see also*, *Worship*, WEBSTER’S THIRD NEW INTERNATIONAL DICTIONARY (3d ed. 2002); Cambridge English Dictionary, *Worship*, <https://dictionary.cambridge.org/us/dictionary/english/worship> (last visited July 12, 2023) (showing “a strong feeling of respect and admiration for God or a god”); Dictionary.Com, *Worship*, <https://www.dictionary.com/browse/worship> (last visited July 12, 2023) (“homage paid to God or a sacred personage, or to any object regarded as sacred”); The Britannica Dictionary, *Worship*, <https://www.britannica.com/dictionary/worship> (last visited July 12, 2023) (“to show respect and love for God or for a god”).

⁶ *Worship*, BLACK’S LAW DICTIONARY (11th ed. 2019).

prayers to a divine being and other religious practices like the provision of social services to the needy.

The City received testimony from other churches in the region confirming that they also provide “social services” including, a place to charge electronics, dance lessons, financial assistance, food bags, NA and AA meetings, bathrooms, community gardens, on-site counseling, refugee services, and housing education among many other services to the needy. Local citizens also testified about their experience with churches and the integral nature of service ministry to a church use. For example, Pastor Jon Meyers indicated that his church, located in a residential zone in Grants Pass, has several programs that would be described as “social services” that serve people outside of the congregation. Reverend Linda Lee and Louise Abbott both noted that a warm welcome to a stranger or someone in need is an act of worship.

Given the common understanding of church use in the community and beyond, it is not plausible for the City to interpret the “church” use category to exclude service ministries like the activities occurring at St. Tim’s which are a typical part of church use.

B. While the City has considerable leeway when interpreting its own Code, any interpretation must be consistent with federal and state law.

Religious practices are protected by the Oregon Constitution and the laws of the State of Oregon.⁷ This is especially true in situations like this where the City has not identified any compelling or even rationale interest for restricting the use of churches in Brookings to such a narrow set of activities.

There is also strong protection for churches practicing their faith under the Religious Land Use and Institutionalized Persons Act (“RLUIPA”). Congress passed this law after local communities used their zoning restrictions to prevent the establishment of faith communities in certain areas and restrict the types of activities churches could engage in. The law recognizes that providing services to the poor is an essential tenant of Christian faith in all its forms. Assuming there is another zone and property where a church can practice (which is not the case in Brookings), the law *also* recognizes that requiring a church to move its ministry to the poor to another location is a substantial burden on a church’s practice of its religion. A determination that defined Church as narrowly as staff is proposing here would directly contravene RLUIPA.

⁷ Or Const., Art I, §§ 2-3.

Moreover, in Brookings, where there are not *any* zones that allow “social services” and there are no zones that allow a church to conduct these types of activities.

C. **St. Tim’s service ministry is part of its established conditional use and allowed to continue.**

The staff report finds, and we agree, that St. Tim’s established a “church” at the Property prior to the enactment of the BMC and, as such, has a “de facto” conditional use to continue that church use. The staff report also finds that St. Tim’s received a conditional use permit for alternations to the building and expansion of the church use in 1999, which provides conditional use authorization for the activities occurring at that time. During this formal evaluation of the activities occurring at St. Tim’s, which included a public hearing, the City did not impose any additional restrictions on St. Tim’s use or “social service” activities.

The evidence submitted shows that St. Tim’s has continually, since its establishment, provided services to the poor. The evidence also shows that St. Tim’s was providing “social services” of the same type and in the same manner at the time the City granted the 1999 conditional use permit as St. Tim’s provides today.

As far as we are aware, the BMC language addressing “church” use at the time the City evaluated St. Tim’s conditional use in 1999 is identical to the BMC language today. If St. Tim’s service to the poor in 1999 was not an allowed part of its “church” operations the City should not have approved an expansion of the church use without conditions addressing or disallowing the service ministry. Instead, the City *did* approve the church expansion and found that there would be little to no impact on the surrounding neighborhood from the expansion of the church use.

Father Bernie testified that prior to the Church’s expansion in 1999, the church held the same office hours as today (Monday, Wednesday, and Friday from 9 am to noon). During that time, the same activities that occur today were occurring. As Father Bernie put it, “people were able to use the shower, have fellowship with others, and receive advice on a range of topics.” (July 3, 2023 Letter from Father Bernie, 2). Today, those same services are offered during office hours, and are also referred to as the “day program,” “advocacy program,” and “legal clinic.”

Father Bernie also provided testimony that a shower was added during an expansion of the church in the early 1980s. This was not put in for anyone living on the property, but rather as something community members can use. Allowing those seeking fellowship to use the shower as a part of St. Tim’s alms-giving practice has continued since the shower was installed in the

early 1980's and was ongoing in 1999. The same shower is available for use in the same manner today during St. Tim's office hours.

In sum, since St. Tim's establishment at the property, it has done what every church does. In addition to providing regular services for prayer and sermons, it provides services to the poor. The evidence on the record, including dictionary definitions, churches nationwide, and even testimony from local citizens, provides overwhelming evidence that a "church" use includes the religious services offered by St. Tim's. Even if St. Tim's activities are outside the scope of a "church" use in Brookings, St. Tim's has a right to continue to offer these services because they are similar in type and manner to the services authorized by its de facto conditional use permit and reauthorized by the 1999 conditional use permit.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Allison J. Reynolds". The signature is fluid and cursive, with the first name being the most prominent.

Allison J. Reynolds

BROOKINGS PLANNING COMMISSION MINUTES
August 1, 2023

CALL TO ORDER

The regular meeting of the Brookings Planning Commission was called to order by Chair Watwood at 7:00 pm in the Council Chambers at Brookings City Hall followed by the Pledge of Allegiance.

ROLL CALL

Commissioners Present: Anthony Bond, Sage Bruce, Cody Coons, Skip Hunter, Clayton Malmberg, Gerry Wulkowicz (arrived 7:02), Chair Skip Watwood

Staff Present: PWDS Director Tony Baron, Deputy Director PWDS Lauri Ziemer, City Attorney Lori Cooper by phone

Others Present: APP-1-23 - Applicant's Attorney Allison Reynolds by phone. 25 audience members

Media Present: 2

PLANNING COMMISSION CHAIR PERSON ANNOUNCEMENTS

Commissioner Skip Hunter addressed the Commission concerning his recusing himself at the previous meeting regarding File No. APP-1-23 and leaving the meeting and asking if it was appropriate for him to be included in the continuation of the hearing tonight. **Motion made by Commissioner Wulkowicz to allow Commissioner Hunter to stay for the APP-1-23 continuation hearing but not be able to vote based on the fact that he did not hear all the public testimony presented at the last meeting; motion seconded and by a 5-1 vote with Commissioner Hunter abstaining and Commissioner Bond voting nay the motion carried.**

PUBLIC HEARINGS

- 4.1 In the matter of File No. CUP-8-23, a request for approval of a Conditional Use Permit to operate a Short Term Rental facility at 211 Marine Drive Spur; Assessors Map & Tax Lot No. 4113-05B-01100.

There was no ex parte contact, bias, personal interest, or conflicts of interest declared and no objection to the jurisdiction of the Planning Commission to hear the matter. The public hearing was opened at 7:17 pm. PWDS Director Tony Baron reviewed the staff report.

Applicant Salomeja Lescinskas, was present to answer any questions.

Barbara Tantare, 16720 Marine Dr, Brookings spoke in opposition of the residence as a short term rental.

Monika Tantare, 16720 Marine Dr, Brookings spoke in opposition of the residence as a short term rental.

No participant requested additional time to submit materials. Public hearing was closed at 7:23 pm.

The Commission deliberated. **Motion made by Commissioner Malmberg to approve File No. CUP-8-23 a request for a Conditional Use Permit to operate a short term rental at 211 Marine Drive Spur based on the findings and conclusions stated in the staff report and subject to the Conditions of Approval; motion seconded and with no further discussion by a 7-0 vote the motion carried.**

Motion made by Commissioner Coons to approve the Final Order regarding file CUP-8-23, based on the findings and conclusions stated in the staff report and subject to the Conditions of Approval; motion seconded and with no further discussion by a 7-0 vote the motion carried.

- 4.2 In the matter of File No. APP-1-23, continuation of an appeal to the Planning Commission of a Notice of Abatement issued April 14, 2023 to St. Timothy's Episcopal Church, at 401 Fir Street, Assessor's Map & Tax Lot No. 4113-05BC-07300.

Commissioner Hunter remained for the public hearing. The public hearing portion of this matter was closed at the previous meeting, no further public testimony was provided. The public hearing was opened at 7:39 pm. PWDS Director Tony Baron outlined the status of the hearing procedures.

Commissioners discussed and deliberated City authority, church practices and services provided.

Motion made by Commissioner Malmberg to deny File No. APP-1-23, an appeal to the Planning Commission of a Notice of Abatement issued April 14, 2023 to St. Timothy's Episcopal Church, at 401 Fir Street, Assessor's Map & Tax Lot No. 4113-05BC-07300, and direct staff to prepare a Final Order of Denial to be submitted at the September 5, 2023 Planning Commission meeting. Motion seconded. Commission discussion continued. By a 4-2 vote with Commissioners Wulkowicz and Coons voting nay the motion carried.

MINUTES FOR APPROVAL

5.1 Minutes of regular Planning Commission meeting of May 2, 2023.

Motion made by Commissioner Wulkowicz to approve the Planning Commission minutes of June 27, 2023; motion seconded and with no further discussion by a 7-0 vote the motion carried.

UNSCHEDULED PUBLIC APPEARANCES –

Dominick Imperatrice, 910 Weaver Lane, Brookings, addressed the Commission regarding Weaver Lane Deferred Improvement Agreements.

Cheryl Kelmar, 914 Marina Heights, Brookings, addressed the Commission regarding good neighbor outdoor lighting.

REPORT FROM THE PLANNING STAFF - None

COMMISSION FINAL COMMENTS - None

ADJOURNMENT

Chair Watwood adjourned the meeting at 8:15 pm.

Respectfully submitted,


Skip Watwood, Brookings Planning Commission Chair
Approved at the September 5, 2023 meeting

PLANNING COMMISSION AGENDA

CITY OF BROOKINGS
Council Chambers - 898 Elk Drive
September 5, 2023 at 7:00 PM



1. CALL TO ORDER - PLEDGE OF ALLEGIANCE
2. ROLL CALL
3. PLANNING COMMISSION CHAIR PERSON ANNOUNCEMENTS
4. PUBLIC HEARINGS - The below applications are Quasi-judicial hearings and the Planning Commission will make a decision on each of these matters.

4.1 In the matter of File No. CUP-9-23, a request for approval of a Conditional Use Permit to operate a Short Term Rental facility at 17336 West Blueberry Drive Assessor's Map & Tax Lot No. 4014-25CC-02405; zoned R-1. The owner/applicant is Patricia M. Walker. Criteria used to decide this matter can be found in Brookings Municipal Code Chapter 17, Sections: 17.20.040(Q) Single Family Residential Conditional Uses; 17.124.170 – Short-Term Rentals; and 17.136 - Conditional Uses.

4.2 Continuation In the matter of File No. APP-1-23, an appeal to the Planning Commission of a Notice of Abatement issued April 14, 2023 to St. Timothy's Episcopal Church, at 401 Fir Street, Assessor's Map & Tax Lot No. 4113-05BC-07300. Criteria used to decide this matter is found in Brookings Municipal Code Chapters 17.156 (Appeal to Planning Commission), 17.01.040 (Compliance with code provisions) and [17.124.050](#) (Benevolent meal service).

5. MINUTES FOR APPROVAL
 - 5.1 Minutes of Planning Commission meeting August 1, 2023.
6. UNSCHEDULED PUBLIC APPEARANCES
7. REPORT FROM THE PLANNING STAFF
8. COMMISSION FINAL COMMENTS
9. ADJOURNMENT

Unscheduled public appearances and comments are limited to 5 minutes. All public meetings are held in accessible locations. Auxiliary aids will be provided upon request with advance notification. You can view the Planning Commission meeting LIVE on television on Charter PEG Channel 181; stream it LIVE on a computer by copying and pasting the following link inside your web browser: <mms://68.185.2.46:8080>; or to stream it LIVE on a mobile device you will need to download the VLC Media Player which is available at: <https://or-brookings2.civicplus.com/252/Watch-Meetings-Live> and follow directions and links for your device.



City of Brookings

898 Elk Drive, Brookings, OR 97415

(541) 469-1103 Fax (541) 469-3650 TTY (800) 735-1232

www.brookings.or.us

PUBLIC WORKS AND DEVELOPMENT SERVICES DEPARTMENT

Email: July 27, 2023

Publish: August 9, 2023 - Curry Coastal Pilot

NOTICE OF PUBLIC HEARING BEFORE THE BROOKINGS PLANNING COMMISSION

NOTICE IS HEREBY GIVEN that a public hearing will be held before the Brookings Planning Commission on Tuesday, September 5, 2023 at 7:00 PM in the Council Chambers of Brookings City Hall, 898 Elk Drive, Brookings, OR 97415. The below application is a Quasi-judicial hearing and the Planning Commission will make a decision on this matter.

In the matter of File No. CUP-9-23, a request for approval of a Conditional Use Permit to operate a Short Term Rental facility at 17336 West Blueberry Drive & Tax Lot No. 4014-25CC-02405; zoned R-1. The owner/applicant is Patricia M. Walker. Criteria used to decide this matter can be found in Brookings Municipal Code Chapter 17, Sections: 17.20.040(Q) Single Family Residential Conditional Uses; 17.124.170 – Short-Term Rentals; and 17.136 - Conditional Uses.

The public is invited to attend and participate in the public hearing. All persons wishing to address this matter will have an opportunity to do so in person at the hearing or by submitting written evidence to the Brookings Planning Department at the address above. If you wish to speak at the hearing, you will be asked to sign in and afforded five (5) minutes to speak. Failure to raise an issue accompanied by statements or evidence sufficient to afford the Planning Commission and parties an opportunity to respond to the issues precludes appeal to the Oregon Land Use Board of Appeals (LUBA).

A copy of the application, all documents and evidence submitted on behalf of the applicant is available for public inspection at no cost at the Brookings Planning Department, 898 Elk Drive, Brookings, OR. The staff report prepared in this case will be available seven days prior to the hearing. Copies of documents may be obtained at reasonable cost.

All public meetings are held in accessible locations, auxiliary aids will be provided upon request with advance notification. Please contact 541-469-1103 to make appropriate arrangements or for additional information. TTY 800-735-1232.

**BEFORE THE PLANNING COMMISSION
CITY OF BROOKINGS, COUNTY OF CURRY
STATE OF OREGON**

In the matter of Planning Commission File No. APP-1-23; an Appeal of a Notice of Abatement issued April 14, 2023 to St. Timothy's Episcopal Church)))))	Final ORDER, Findings of Fact, and Conclusions of Law
---	-----------------------	--

ORDER denying an Appeal of a Notice of Abatement issued April 14, 2023 to St. Timothy's Episcopal Church; Assessor's Map 4113-05BC, Tax Lot 07300; zoned R-1-6 (Single Family Residential).

WHEREAS:

1. The Planning Commission duly accepted the appeal filed in accordance with the Brookings Municipal Code (BMC), pursuant to Chapter 8.15.090 - General abatement procedure; Chapter 17.156 - Appeal to Planning Commission; Chapter 17. 01 Section 17.01.040 – Compliance with Code Provisions; Chapter 17.20.040.B. - Conditional uses. (in SINGLE-FAMILY RESIDENTIAL (R-1) DISTRICT); and Chapter 17.120.010 - Continuation of a nonconforming use; and
2. The Brookings Planning Commission duly set this matter upon the agenda of a public meeting and considered the above described appeal with the public hearing a matter of record of the Planning Commission meetings of June 27, 2023 and August 1, 2023; and
3. At the public meeting on said appeal, evidence and testimony was presented by the Appellant, those in favor of the appeal, and those opposed to the appeal; and recommendations were received from and presented by staff in the form of a Staff Report, dated June 15, 2023 and oral presentation of same; and
4. At the conclusion of the public hearing, after consideration and discussion of testimony and evidence presented in the public hearing, the Planning Commission, upon a motion duly seconded, accepted the Staff Agenda Report and **DENIED** the appeal and directed staff to prepare a Final Order, Findings of Fact, and Conclusions of Law to that effect.

THEREFORE, LET IT BE HEREBY ORDERED that the appeal is DENIED. This denial is supported by the following findings and conclusions:

CRITERIA, FINDINGS, AND CONCLUSIONS

BMC 17.156.010 provides:

In the event of an ambiguity in this title affecting enforcement, the Planning Commission shall have the power to hear and decide appeals from administrative interpretations and to declare the meaning and intent, and interpret the provisions of this code. In thus resolving ambiguities, being considered in this appeal, the Planning Commission shall so interpret this code as to carry out BMC [17.01.020](#) and the expressed purpose of the zoning district involved.

The express purpose of the R-1-6 residential Zone, as stated in BMC 17.20.010 is:

To promote and encourage a suitable environment for family living and to protect and stabilize the residential characteristics of the district, the R-1 district is intended to provide for single-family residential homes at urban standards.

BMC 17.20.040.B allows churches in the R-1-6 as a conditional use. BMC Chapter 17.136 governs the process for obtaining a conditional use permit.

St. Timothy's Church existed and was operating prior to 1989, when the Brookings Land Development Ordinance was adopted. Therefore, the Church was considered to be a legal non-conforming use at that time.

BMC 17.120.010 (Continuation of a nonconforming use) provides that a lawfully preexisting use of a structure or site, which does not conform to the regulations for the district in which it is located, shall be deemed to be a lawful, nonconforming use, and may be continued, subject to regulations regarding maintaining, moving, altering, or enlarging the nonconforming structure. The BMC does not contain any provisions regarding altering or increasing the activities occurring on or within the property or the nonconforming structure.

In 1999, the church applied for a minor change to its CUP to "accommodate" its "growing congregation." See Pages 19-35 of the June 27, 2023 Planning Commission Agenda Packet. The 1999 minor amendment to the CUP was for a 392 square foot addition to the chapel area to add approximately 20 additional seats, as well as an additional 8 parking spaces.

There was no evidence submitted to the record during the 1999 minor amendment process which sheds any light on what activities were being held at the church at that time. It is clear from the 1999 record that approved minor amendment to the CUP dealt strictly with the physical expansion of the church's chapel area and the addition of parking spaces, both of which were needed to accommodate a growing congregation. No mention of any types of "alms" or "social services" can be found in the 1999 minor amendment record.

In its April 24, 2023, appeal letter, the Church asserts that it has continuously conducted "social services" since its establishment (prior to adoption of the Brookings Land Development Ordinance in 1989), but provides no evidence to support that assertion.

In two letters submitted to the record as part of the abatement appeal, Reverend Bernie Lindley, the pastor of St. Timothy's Church, asserts that "alms" have been provided at the Church since its inception. His letters state that originally, these alms took the form of financial assistance to people for things such as rent, utilities, bus tickets, and gasoline. Rev. Lindley states that in the 2000's a shift occurred in what types of alms visitors needed, and that the Church began providing clothing, personal hygiene items, and car repair assistance for those in need. See June 27, 2023 Lindley letter (Pages 7-11 of "Supplemental Planning Commission Packet") and July 3, 2023 Lindley letter (Pages 5-7 of Supplemental Planning Commission Packet II).

According to Rev. Lindley's June 27, 2023 letter, the Advocacy Program includes assistance to visitors in obtaining birth certificates and identification cards, enrolling in health insurance, connecting to therapy and treatment, applying for jobs and housing, and providing referrals to service providers. In addition,

the Advocacy Program includes assistance to visitors from a licensed attorney who offers counseling and advice to individuals with questions about issues such as citations, court fines, records expungement, SSI, food stamp benefits and who need referrals to attorneys with various skills.

In an April 12, 2023 deposition, Rev. Lindley stated that the “Advocacy Program” began in “approximately” 2018. This statement provides evidence that the Advocacy Program began many years *after* the church was established. This shows that the nonconforming use and/or unpermitted conditional use was altered and/or expanded in 2018, and the Church should have requested a modification to its conditional use permit for these uses. See excerpt of Lindley deposition, Attachment D to June 15, 2027 Planning Commission Staff Agenda Report.

In determining whether a nonconforming use has been established, and the extent of the nonconforming use, a factual determination is needed regarding what uses were in place at the Church in 1989 (when the Land Development Ordinance was adopted). The Church has the burden of proving both that the use existed in 1989, and what the level of use was at that time. See *Lane County v. Bessett*, 46 Or App 319, (1980); *Tylka v. Clackamas County*, 28 Or LUBA 417 (1994); *Fraley v. Deschutes County*, 32 Or LUBA 27, aff’d, 145 Or App 484 (1996); *Smith v. Lane County*, 21 Or LUBA 228 (1991).

A similarly analysis governs the determination of whether the type and scope of activities permitted by the 1999 minor change to the conditional use permit have been changed or expanded – the Church has the burden of proving both that the use existed in 1999, and what the level of use was at that time.

The Church has not met its burden of proving that the types and scope of the “social services” it is providing currently have been continuously provided since 1989 (when the City adopted its Land Development Code and at which point the church became a legal nonconforming use) and/or since 1999 (when the Church applied for and was granted a minor change to its conditional use).

Therefore, the Planning Commission determines that the abatement notice issued by the City on April 14, 2023 was properly issued. The Church is required to abate the types and level/scope of “social service” activities that it is currently providing and apply for an amendment to its conditional use permit to conduct such activities at the Church location.

Dated this 5th day of September, 2023

ATTEST:

Skip Watwood, Chair
Brookings Planning Commission

Anthony Baron, PWDS Director

BROOKINGS PLANNING COMMISSION MINUTES

August 1, 2023

CALL TO ORDER

The regular meeting of the Brookings Planning Commission was called to order by Chair Watwood at 7:00 pm in the Council Chambers at Brookings City Hall followed by the Pledge of Allegiance.

ROLL CALL

Commissioners Present: Anthony Bond, Sage Bruce, Cody Coons, Skip Hunter, Clayton Malmberg, Gerry Wulkowicz (arrived 7:02), Chair Skip Watwood

Staff Present: PWDS Director Tony Baron, Deputy Director PWDS Lauri Ziemer, City Attorney Lori Cooper by phone

Others Present: APP-1-23 - Applicant's Attorney Allison Reynolds by phone. 25 audience members

Media Present: 2

PLANNING COMMISSION CHAIR PERSON ANNOUNCEMENTS

Commissioner Skip Hunter addressed the Commission concerning his recusing himself at the previous meeting regarding File No. APP-1-23 and leaving the meeting and asking if it was appropriate for him to be included in the continuation of the hearing tonight. **Motion made by Commissioner Wulkowicz to allow Commissioner Hunter to stay for the APP-1-23 continuation hearing but not be able to vote based on the fact that he did not hear all the public testimony presented at the last meeting; motion seconded and by a 5-1 vote with Commissioner Hunter abstaining and Commissioner Bond voting nay the motion carried.**

PUBLIC HEARINGS

4.1 In the matter of File No. CUP-8-23, a request for approval of a Conditional Use Permit to operate a Short Term Rental facility at 211 Marine Drive Spur; Assessors Map & Tax Lot No. 4113-05B-01100.

There was no ex parte contact, bias, personal interest, or conflicts of interest declared and no objection to the jurisdiction of the Planning Commission to hear the matter. The public hearing was opened at 7:17 pm. PWDS Director Tony Baron reviewed the staff report.

Applicant Salomeja Lescinskas, was present to answer any questions.

Barbara Tantare, 16720 Marine Dr, Brookings spoke in opposition of the residence as a short term rental.

Monika Tantare, 16720 Marine Dr, Brookings spoke in opposition of the residence as a short term rental.

No participant requested additional time to submit materials. Public hearing was closed at 7:23 pm.

The Commission deliberated. **Motion made by Commissioner Malmberg to approve File No. CUP-8-23 a request for a Conditional Use Permit to operate a short term rental at 211 Marine Drive Spur based on the findings and conclusions stated in the staff report and subject to the Conditions of Approval; motion seconded and with no further discussion by a 7-0 vote the motion carried.**

Motion made by Commissioner Coons to approve the Final Order regarding file CUP-8-23, based on the findings and conclusions stated in the staff report and subject to the Conditions of Approval; motion seconded and with no further discussion by a 7-0 vote the motion carried.

4.2 In the matter of File No. APP-1-23, continuation of an appeal to the Planning Commission of a Notice of Abatement issued April 14, 2023 to St. Timothy's Episcopal Church, at 401 Fir Street, Assessor's Map & Tax Lot No. 4113-05BC-07300.

Commissioner Hunter remained for the public hearing. The public hearing portion of this matter was closed at the previous meeting, no further public testimony was provided. The public hearing was opened at 7:39 pm. PWDS Director Tony Baron outlined the status of the hearing procedures.

Commissioners discussed and deliberated City authority, church practices and services provided.

Motion made by Commissioner Malmberg to deny File No. APP-1-23, an appeal to the Planning Commission of a Notice of Abatement issued April 14, 2023 to St. Timothy's Episcopal Church, at 401 Fir Street, Assessor's Map & Tax Lot No. 4113-05BC-07300, and direct staff to prepare a Final Order of Denial to be submitted at the September 5, 2023 Planning Commission meeting. Motion seconded. Commission discussion continued. By a 4-2 vote with Commissioners Wulkowicz and Coons voting nay the motion carried.

MINUTES FOR APPROVAL

5.1 Minutes of regular Planning Commission meeting of May 2, 2023.

Motion made by Commissioner Wulkowicz to approve the Planning Commission minutes of June 27, 2023; motion seconded and with no further discussion by a 7-0 vote the motion carried.

UNSCHEDULED PUBLIC APPEARANCES –

Dominick Imperatrice, 910 Weaver Lane, Brookings, addressed the Commission regarding Weaver Lane Deferred Improvement Agreements.

Cheryl Kelmar, 914 Marina Heights, Brookings, addressed the Commission regarding good neighbor outdoor lighting.

REPORT FROM THE PLANNING STAFF - None

COMMISSION FINAL COMMENTS - None

ADJOURNMENT

Chair Watwood adjourned the meeting at 8:15 pm.

Respectfully submitted,

Skip Watwood, Brookings Planning Commission Chair
Approved at the September 5, 2023 meeting



City of Brookings

898 Elk Drive, Brookings, OR 97415
(541) 469-1159 Fax (541) 469-3650 TTY (800) 735-1232
www.brookings.or.us

PUBLIC WORKS AND DEVELOPMENT SERVICES DEPARTMENT

September 6, 2023

COPY

St. Timothy's Church
Diocese of Oregon
PO Box 1237
Brookings, OR 97415

RE: Final Order in the matter of Planning Commission File No. APP-1-23

Dear St. Timothy's Church:

On September 5, 2023 Planning Commission approved the enclosed Final Order and Findings of Fact in regards to the above application. Enclosed please find a copy of the Final Order.

Please be advised that decisions of the Planning Commission may be appealed to the City Council within fifteen (15) days of postmark of the decision notice, pursuant to the Land Development Code, Chapter 17 Section 152. All documents pertaining to the Planning Commission's decision, including the Final Order, are available through the Planning Department for public viewing and copies of documents may be obtained at reasonable cost.

If you have any questions, please let us know.

Sincerely,

Lauri Ziemer
Deputy PWDS Director

Enclosed: Final Order

cc: Allison Reynolds, Stoel Rives LLP, 760 SW Ninth Avenue, Ste 3000, Portland, OR 97205

**BEFORE THE PLANNING COMMISSION
CITY OF BROOKINGS, COUNTY OF CURRY
STATE OF OREGON**

In the matter of Planning Commission File No. APP-1-23; an)	
Appeal of a Notice of Abatement issued April 14, 2023 to)	Final ORDER, Findings of Fact,
St. Timothy's Episcopal Church)	and Conclusions of Law
)	

ORDER denying an Appeal of a Notice of Abatement issued April 14, 2023 to St. Timothy's Episcopal Church; Assessor's Map 4113-05BC, Tax Lot 07300; zoned R-1-6 (Single Family Residential).

WHEREAS:

1. The Planning Commission duly accepted the appeal filed in accordance with the Brookings Municipal Code (BMC), pursuant to Chapter 8.15.090 - General abatement procedure; Chapter 17.156 - Appeal to Planning Commission; Chapter 17.01 Section 17.01.040 – Compliance with Code Provisions; Chapter 17.20.040.B. - Conditional uses. (in SINGLE-FAMILY RESIDENTIAL (R-1) DISTRICT); and Chapter 17.120.010 - Continuation of a nonconforming use; and
2. The Brookings Planning Commission duly set this matter upon the agenda of a public meeting and considered the above described appeal with the public hearing a matter of record of the Planning Commission meetings of June 27, 2023 and August 1, 2023; and
3. At the public meeting on said appeal, evidence and testimony was presented by the Appellant, those in favor of the appeal, and those opposed to the appeal; and recommendations were received from and presented by staff in the form of a Staff Report, dated June 15, 2023 and oral presentation of same; and
4. At the conclusion of the public hearing, after consideration and discussion of testimony and evidence presented in the public hearing, the Planning Commission, upon a motion duly seconded, accepted the Staff Agenda Report and **DENIED** the appeal and directed staff to prepare a Final Order, Findings of Fact, and Conclusions of Law to that effect.

THEREFORE, LET IT BE HEREBY ORDERED that the appeal is **DENIED**. This denial is supported by the following findings and conclusions:

CRITERIA, FINDINGS, AND CONCLUSIONS

BMC 17.156.010 provides:

In the event of an ambiguity in this title affecting enforcement, the Planning Commission shall have the power to hear and decide appeals from administrative interpretations and to declare the meaning and intent, and interpret the provisions of this code. In thus resolving ambiguities, being considered in this appeal, the Planning Commission shall so interpret this code as to carry out BMC [17.01.020](#) and the expressed purpose of the zoning district involved.

The express purpose of the R-1-6 residential Zone, as stated in BMC 17.20.010 is:

To promote and encourage a suitable environment for family living and to protect and stabilize the residential characteristics of the district, the R-1 district is intended to provide for single-family residential homes at urban standards.

BMC 17.20.040.B allows churches in the R-1-6 as a conditional use. BMC Chapter 17.136 governs the process for obtaining a conditional use permit.

St. Timothy's Church existed and was operating prior to 1989, when the Brookings Land Development Ordinance was adopted. Therefore, the Church was considered to be a legal non-conforming use at that time.

BMC 17.120.010 (Continuation of a nonconforming use) provides that a lawfully preexisting use of a structure or site, which does not conform to the regulations for the district in which it is located, shall be deemed to be a lawful, nonconforming use, and may be continued, subject to regulations regarding maintaining, moving, altering, or enlarging the nonconforming structure. The BMC does not contain any provisions regarding altering or increasing the activities occurring on or within the property or the nonconforming structure.

In 1999, the church applied for a minor change to its CUP to "accommodate" its "growing congregation." See Pages 19-35 of the June 27, 2023 Planning Commission Agenda Packet. The 1999 minor amendment to the CUP was for a 392 square foot addition to the chapel area to add approximately 20 additional seats, as well as an additional 8 parking spaces.

There was no evidence submitted to the record during the 1999 minor amendment process which sheds any light on what activities were being held at the church at that time. It is clear from the 1999 record that approved minor amendment to the CUP dealt strictly with the physical expansion of the church's chapel area and the addition of parking spaces, both of which were needed to accommodate a growing congregation. No mention of any types of "alms" or "social services" can be found in the 1999 minor amendment record.

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According to Rev. Lindley's June 27, 2023 letter, the Advocacy Program includes assistance to visitors in obtaining birth certificates and identification cards, enrolling in health insurance, connecting to therapy and treatment, applying for jobs and housing, and providing referrals to service providers. In addition,

the Advocacy Program includes assistance to visitors from a licensed attorney who offers counseling and advice to individuals with questions about issues such as citations, court fines, records expungement, SSI, food stamp benefits and who need referrals to attorneys with various skills.

In an April 12, 2023 deposition, Rev. Lindley stated that the "Advocacy Program" began in "approximately" 2018. This statement provides evidence that the Advocacy Program began many years *after* the church was established. This shows that the nonconforming use and/or unpermitted conditional use was altered and/or expanded in 2018, and the Church should have requested a modification to its conditional use permit for these uses. See excerpt of Lindley deposition, Attachment D to June 15, 2027 Planning Commission Staff Agenda Report.

In determining whether a nonconforming use has been established, and the extent of the non-conforming use, a factual determination is needed regarding what uses were in place at the Church in 1989 (when the Land Development Ordinance was adopted). The Church has the burden of proving both that the use existed in 1989, and what the level of use was at that time. See *Lane County v. Bessett*, 46 Or App 319, (1980); *Tylka v. Clackamas County*, 28 Or LUBA 417 (1994); *Fraley v. Deschutes County*, 32 Or LUBA 27, aff'd, 145 Or App 484 (1996); *Smith v. Lane County*, 21 Or LUBA 228 (1991).

A similarly analysis governs the determination of whether the type and scope of activities permitted by the 1999 minor change to the conditional use permit have been changed or expanded – the Church has the burden of proving both that the use existed in 1999, and what the level of use was at that time.

The Church has not met its burden of proving that the types and scope of the "social services" it is providing currently have been continuously provided since 1989 (when the City adopted its Land Development Code and at which point the church became a legal nonconforming use) and/or since 1999 (when the Church applied for and was granted a minor change to its conditional use).

Therefore, the Planning Commission determines that the abatement notice issued by the City on April 14, 2023 was properly issued. The Church is required to abate the types and level/scope of "social service" activities that it is currently providing and apply for an amendment to its conditional use permit to conduct such activities at the Church location.

Dated this 5th day of September, 2023

ATTEST:



Skip Watwood, Chair
Brookings Planning Commission



Anthony Baron, PWDS Director



Sr. Cora Rose <sistercorarose@gmail.com>

2023 ONLD Annual Meeting & Social :: OSB 194461

Oregon State Bar (ONLD) <onld@osbar.org>
Reply-To: onld@osbar.org
To: cora@sttimothyepiscopal.org

Tue, Oct 10, 2023 at 2:50 PM

View this email [in your browser](#).

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You're invited!

Join us for an evening of food, drinks, and connection at the Oregon New Lawyers Division Annual Meeting. We will be presenting the 2023 ONLD Awards and all attendees will vote on the proposed 2024 Executive Committee nominees.

When: Friday, November 3, at 5:00 pm

Where: **McMenamins Kennedy School Gymnasium**
5736 NE 33rd. Ave. Portland, OR 97211

Here are the 2023 Oregon New Lawyers Division Award Winners:

Member Services Award: Sarah Osborn
Public Service Award: Cora Rose and Emily Templeton
Advancing Diversity Award: Chloe Clay
Volunteer of the Year Award: William Ness
ONLD Award of Excellence: Kristi Skelman
The Honorable John V. Acosta Professionalism Award: Judge Mustafa Kasubhai
ONLD Project of the Year Award: ONLD Pronoun Pledge

Appetizers and non-alcoholic drinks will be provided on behalf of the ONLD, and boozy beverages will be available for purchase.

If you plan on attending or have any questions, please send an email to to onld@osbar.org.

Attendees requiring an accommodation under federal or state law may **request a reasonable accommodation** by contacting the OSB's ADA Coordinator as soon as possible but no later than 48 hours before the scheduled event. More information can be found [here](#).



Oregon
New Lawyers
Division

Oregon State Bar

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2023 Featured Presentations

Keynote Presentations

Three Steps to Better Public Health for All Chris Chanyasulkit, PhD, MPH

Join Dr. Chris Chanyasulkit, President of the American Public Health Association (APHA), for her keynote address to the Oregon Public Health Association's Annual Conference where she discusses APHA's advocacy priorities to promote health and equity to address the systemic causes of the social determinants of health. Dr. Chanyasulkit will conclude her interactive keynote with sharing her three steps to better public health for all!

"Ore-gun" – Reducing Firearm Injuries and Violence across our State Using the Tools of Public Health

Kathleen Carlson, MS, PhD

Injuries and violence are predictable and, thus, they are preventable — by monitoring patterns to identify causes and high-risk groups, developing multifaceted strategies to reduce risk, scientifically evaluating the strategies, and supporting and scaling up those that work. Using the tools of public health to reduce firearm-related injuries and violence is no different. This presentation will describe the epidemiology of firearm injuries and violence in Oregon and will use a socio-ecologic lens to discuss causes and outcomes of these injuries among individuals, their families and communities, and our society. It will then describe public health responses to this epidemic, including new initiatives to build a public health infrastructure for firearm injury and firearm violence prevention.

The D Word – How We Talk About Disability And Why It Matters in Public Health Christine Getman

Disability health equity begins with healing our own relationship with saying the word "disabled" and our assumptions about what it means to be disabled. A reflective conversation about ableism, intersectionality, and how to effectively apply values of disability rights movements to our health equity work.

Plenary Panel

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Our Tweets

Tweets from @ORPublicHealth



**Nothing
to see
here -
yet**

When they Tweet,
their Tweets will

Upcoming Events

Mon Oct 16, 2023

[79th OPHA Annual Conference & Meeting](#)

Category: OPHA Events

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Oregon at the Intersection of Homelessness and Public Health

Homelessness is a critical public health issue. According to the American Public Health Association, people experiencing homelessness have high rates of chronic mental and physical health conditions. They face many barriers to accessing health care and complying with health care directives, such as correctly taking prescription medications. People experiencing homelessness die, on average, 17 years earlier than those who are housed. No single strategy will be sufficient to address or end homelessness. Cross-sector collaborations and interventions in housing, health, and income stabilization are essential and must be holistically integrated, to allow individuals experiencing homelessness to find their unique path to recovery.

Oregon is a geographically expansive state with just over 33% of the population living in rural areas and 2% in frontier areas. Each Oregon community is unique and has widely different resources. The entities that accept responsibility for public health issues take many forms, especially in areas as complex as homelessness. Members of the closing panel will 1) address how public health and homelessness are deeply intertwined; 2) discuss proposed strategies to tackle homelessness from the viewpoint of different sectors (Non-Profit Housing Organizations, Faith-Based Organizations, and State Governmental Agencies; and 3) share perspectives from diverse professional, personal, and lived experiences.

Facilitator: Tammy Baney

Panelists: Alan Evans, Father Bernie Lindley, Liz Weber

Speaker Bios



Kathleen Carlson, MS, PhD

Kathleen Carlson, MS, PhD is a Professor of Epidemiology at the Oregon Health & Science University-Portland State University School of Public Health, and a Core Investigator with the VA Portland Health Care System's Health Services Research Center of Innovation. Dr. Carlson completed her BS degree at Oregon State University, and her MS and PhD degrees at the University of Minnesota School of Public Health, focused on injury and violence epidemiology. Dr. Carlson's research examines the spectrum of injury and violence prevention, from the epidemiology of intentional and unintentional injuries to the rehabilitation of military veterans with combat injuries and comorbid mental health disorders. Her current research grants examine gun violence and other firearm-related injuries, opioid-related injuries, and the short- and long-term functional outcomes of veterans' traumatic brain injury. Dr. Carlson teaches and mentors MPH and PhD students in epidemiology and research methodology, and directs the health services research postdoctoral fellowship program at the Portland VA. She also leads the newly formed OHSU Gun Violence Prevention Research Center, focused on using the tools of public health to reduce firearm-related injury and death in Oregon and nationwide. Her leadership roles with national injury prevention organizations include serving on

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the Board of Directors for the Society for Advancement of Violence and Injury Research and with the Injury Control and Emergency Health Services section of the American Public Health Association.

Born and raised in rural Oregon, Dr. Carlson grew up with firearms and is a firearm owner. In 2013, she also experienced the loss of a family member to firearm suicide.



Christine Getman

Christine Getman (she/her) is a Disability Health Equity Strategist at the Oregon Health Authority. She joined the agency during the COVID-19 Response as an Accessibility Policy Analyst. She is also the Executive Director of Magic Wheelchair, a nonprofit organization that promotes inclusion and self-expression of children with disabilities through adaptive cosplay. In both roles, she openly embraces the term “disability pride” and strategically holds industries to higher standards for disability representation. She studied Public Health and Psychology at Portland State University. Her career experience and lived experience has shaped a multifaceted journey which includes executive leadership, legislative advocacy, accessibility, program development, evaluation, and grant writing.



Chris Chanyasulkit, MPH, PhD

Chris Chanyasulkit is grounded in a strong belief in eliminating the structural barriers to equity for vulnerable populations. Chris holds leadership positions with local, state, regional and national governance and civic engagement organizations, working to promote racial, gender, and health equity. She served as a gubernatorial appointee to the Massachusetts Asian American Commission and the Commission on the Status of Women where she advocated for the needs of Asian Americans and Women throughout the Commonwealth.

Dr. Chanyasulkit has served as a Human Services Specialist and Assistant Director of Diversity in the town of Brookline’s Office of Diversity, Inclusion, and Community Relations. She designed and delivered graduate

public health courses at the Simmons University Department of Public Health. She also serves as an adjunct Assistant Professor at Temple University, where she teaches Public Health Advocacy in the College of Public Health. Chris earned a B.A. in Biology and Art History from Boston University, an M.P.H. (with a concentration in maternal and child health care) from the Boston University School of Public Health, and a Ph.D. in Political Science from Northeastern University, where she conducted research on health disparities.

In addition to her advocacy and scholarly pursuits, Dr. Chanyasulkit is President of the American Public Health Association (APHA), an elected Library Trustee of the Public Libraries of Brookline, a Brookline Community Emergency Response Team member, and a Brookline Medical Reserve Corps member. Chris lives in Brookline, Massachusetts with her husband, James, a software engineer, their three children, and two puppies.



Tammy Baney

After 12 years in elected office, Tammy Baney now serves as the Executive Director of the Central Oregon Intergovernmental Council, the region's Council of Governments. During her time in elected office, Tammy emerged as a leading voice on healthcare reform and overall health system improvement. Her leadership has been recognized by organizations throughout Oregon and nationally. The Oregon Business Association recognized her as an Oregon Statesman of the Year for her work in this area. Tammy currently serves as the chair of the Oregon Transportation Commission, which oversees the Department of Transportation in Oregon and establishes state transportation policy for Oregon's cities and counties. She was appointed to the Commission by former Gov. John Kitzhaber in 2011. She also served two terms on the Oregon Housing Stability Council, which directs the state's affordable-housing agency. She was appointed to the Council by former Gov. Ted Kulongoski in 2010 and appointed Chair in 2017 by Governor Kate Brown.



Alan Evans

Alan Evans is the Founder & President of Helping Hands Reentry Outreach Centers, the largest reentry housing organization in Oregon. Born in California, Alan was raised in a broken family and was homeless at 13, addicted to methamphetamine. He spent 25 years homeless, addicted to drugs and alcohol, and in and

out of prison. When he was 38 years old, Alan was homeless in Seaside, Oregon searching for help. He tried to get food stamps or a job but he was informed he needed ID. When he tried to get ID, he was told that he needed a residence. He wanted a home but had no money. Crime felt like a win-win situation and getting arrested became getting rescued. Alan turned his life around and opened an 8-bed shelter in Seaside in 2002, which grew into Helping Hands. This organization now serves 5 counties and thousands of individuals and families experiencing homelessness. He believes that getting arrested should not equal getting rescued, and the programs provided through his organization give others what they needed, a helping hand to a sustainable life. Helping Hands provides Trauma-Informed, Data-Driven, Person-Centered care through Resources, Recovery, and Reentry in Clatsop, Lincoln, Multnomah, Tillamook, and Yamhill counties.



Father Bernie Lindley

Father Bernie, a native of Brookings, Oregon, has served as the vicar of [St. Timothy's Episcopal Church](#) for the past 15 years. Under Father Bernie's leadership, St. Tim's has served meals at their soup kitchen since 2009. In 2010 they operated a free health clinic that saw 1 out of every 4 working-age adults in the Brookings-Harbor area as patients over a period of 4 years. St. Tim's currently offers the use of their shower during office hours to people who are unhoused. They also have a team that works with folks to obtain replacement birth certificates and ID cards. Many people have signed up for the Oregon Health Plan, food stamps, and other state services at the church. During the pandemic, St. Tim's provided a stand-alone vaccine clinic that administered 3800 vaccinations and over 7000 COVID tests. During the fall/winter of 2021-22, St. Tim's offered wrap-around support to the 1020 people that tested positive for COVID in their testing clinic, providing rental assistance so that sick people could successfully quarantine without fear that missing work would lead to a potential loss of housing.



Liz Weber

Liz Weber is the Health and Housing Policy Analyst for the [Oregon Housing and Community Services](#). Liz has been working in housing and homeless services for almost 20 years. Since joining Oregon Housing and Community Services, she has been focused on the intersection of health and housing policy supporting the implementation of Oregon's 1115 Medicaid waiver. She brings her background in direct service as a

street outreach worker and in non-profit leadership to this exciting opportunity to demonstrate that access to stable housing increases positive health outcomes and decreases health inequity. Over her career, Liz has emphasized person-centered approaches to ending homelessness that respect the dignity and autonomy of people experiencing homelessness. These services include trauma-informed outreach and housing placement, Permanent Supportive Housing, and family homelessness interventions.

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Portland, OR 97204

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Oregon Public Health Association is an affiliated association of the American Public Health Association (APHA). We have collaborated with APHA to grow stronger as organizations, to share expertise, influence, and resources, and to advocate for common priorities at the local, state and federal levels.



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October

Sun	Mon	Tue	Wed	Thu	Fri	Sat
1 10:00am Worship 11:00am Fellowship WORLD COMMUNION SUNDAY	2 OFFICE CLOSED	3 8:00am Women's Bible Study/ Prayer (WBSP)	4 8:00am Men's Bible Study (MBS) 1:45pm Choir	5 Noon Comm Kitchen	6 Noon Al-Anon	7
8 10:00am Worship 11:00am Fellowship	9 OFFICE CLOSED	10 8:00am WBSP 9:15am Mission Cte 10:15am Worship Cte	11 8:00am Men's Bible Study (MBS) 1:45pm Choir	12 10:30am B&F Cte Noon Comm Kitchen	13 Noon Al-Anon	14
15 10:00am Worship 11:00am Fellowship	16 OFFICE CLOSED	17 8:00am WBSP	18 8:00am Men's Bible Study (MBS) 1:45pm Choir	19 10:00am Deacons Noon Comm Kitchen	20 Noon Al-Anon 5:00pm Potluck/ Game Night	21
22 10:00am Worship 11:00am Fellowship	23 OFFICE CLOSED	24 8:00am WBSP	25 8:00am Men's Bible Study (MBS) 1:45pm Choir	26 Noon Comm Kitchen 4:45pm Session	27 Noon Al-Anon	28 8:30—10:00am Co-Ed/ Family Prayer Brkfst <i>Congregation can bring a friend</i>
29 10:00am Worship 11:00am Fellowship REFORMATION SUNDAY	30 OFFICE CLOSED	31 8:00am WBSP 				

Brookings Presbyterian



October 14, 2023

Subject: City Council Oct. 23, 2023, File No. APP-1-23 (St. Timothy's)

Dear City Council:

As an experienced pastor in Central Oregon, I write to provide support and context as you deliberate restricting the Christian ministry of St. Timothy's Episcopal Church in Brookings.

I have personally crossed the state to visit St. Timothy's twice in the last two years, each time enjoying lunch with ministry leaders as they serve the local houseless population. I have also attended worship on Sundays. I am delighted to see a sister congregation reflecting the heart and practices of Jesus so faithfully and so clearly in harmony with the very center of traditional Christian teachings.

I presently serve Nativity Lutheran Church, in Bend Oregon. I have been pastor there for a decade. Nativity practices Christian faith in very similar ways to St. Timothy. Here are eight examples:

1. **Worship** occurs on Sundays. **Worship is our preamble.** In worship, we meet Jesus who insists that when we clothe the naked, feed the hungry, visit the incarcerated, give water to the thirsty, care for the houseless, we "do it for him." We notice that Jesus, (whom Christians follow) fed, healed, forgave and offered new life – both in church and in the wider community -to lepers, prostitutes, the disabled and destitute, to sinners and the whole crowds who were drawn to him.

We notice that Church authorities and state authorities collaborated to reject Jesus, and they crucified him. Their plan ultimately failed.

Therefore, we Lutheran Christians care for the poor, the widow, the houseless, the hungry, the immigrant, and the orphan *as central expressions of our Christian faith* - because these are biblical mandates, and function sacramentally for our faith practice.

2. **Nativity Food Pantry** serves 45 families per week with 70 lbs per visit of excellent groceries, (est. value is around \$300 per visit) served *from our church Fellowship Hall*. Families also use the church restrooms, receive guidance on citizenship, health and social needs. Food Pantry is a Tuesday ministry from noon-3, every week. *Some*

of these families are homeless. Nativity’s Food Pantry has operated for almost 20 years in partnership with the Neighbor Impact/Oregon Food Bank.

3. **Nativity Wood Lot** distributes free firewood to as many as 40 needy households per week, operating every Saturday morning *from Nativity’s parking lot*. Our volunteers process and distribute 350 cords of wood per heating season on site at Nativity. Families also use our restrooms, enjoy a coffee break with snacks, and receive guidance to other local service opportunities. *Some of these families are homeless.* Nativity’s Wood Lot has operated for 15 years.
4. **Nativity’s Head Start Preschool** serves 35 eligible low income households with free preschool for their children. These children receive free meals, free education, and the families are educated and guided to additional services. *Some of these households are homeless.* Nativity’s Head Start preschool has operated for over 15 years.
5. **Nativity Safe Parking** program hosts as many as five homeless households to live in our parking lot as a “waypoint” enroute to permanent housing. Safe Parking is a partnership (*initiated by the City of Bend*) with the City of Bend and Reach Out Central Oregon – a non profit, local case management agency.

Five travel trailers currently occupy the North end of our parking lot. A “porta-potty” onsite and power & water supplied by the church attend to human biology and sanitary needs. In the last four years, 2/3 of the 25 households who have “safely parked” at Nativity have subsequently returned into permanent housing. All of these households previously rented or owned homes in Deschutes County prior to becoming homeless. Some of these individuals also attend church, one of whom sings in our choir. Nativity’s “Safe Parking” has operated since 2020.
6. **Water and electricity** – Nativity makes power and water available to our neighbors who live outside. People routinely charge their phones from our power, using our restrooms and receiving coffee during office hours as they wait. Every afternoon houseless families fill large water jugs from our hose bib - which quench thirst in the swelling homeless camps in the national forest only a few miles from Nativity.
7. **Shower Truck** – Nativity faith leaders take shifts operating the “Shower Truck” in partnership with “Shepherd’s House” ministries, offering showers to houseless neighbors every month *on site* at a sister congregation, Trinity Episcopal Church, also in Bend. We generally give 20-30 showers per week, as people also gather for a free, hot meal at Trinity’s “Family Kitchen,” where thousands of meals are served every month *on site* as an expression of local Christian ministry.

8. **Bethlehem Inn** – Nativity faith leaders serve dinner monthly at the 200 bed Homeless shelter that began *in Nativity's Fellowship Hall* in 1999, prior to blossoming into a stand-alone non-profit. Bethlehem inn is the first houseless shelter in Deschutes County. It began *in our church* as an expression of Christian discipleship.

Civic leaders, I write to share these eight Christian ministries of Nativity (this list is not in any way exhaustive) **to illustrate Nativity Lutheran Church's solidarity with St. Timothy's Episcopal Church.** I must add that my Methodist, Presbyterian and Episcopal clergy colleagues in Bend share their univocal support of my words in this letter.

The ministry work done *on site* at St. Timothy's Episcopal Church in Brookings is simply this: basic, orthodox, everyday, historic Christian life. Where a legitimate Christian church is found, care for the aches of the world will be clear, locally manifest, public and prioritized.

I hope and pray that you will see clearly, and bless St. Timothy's Episcopal Church to continue their faithful Christian work as God's Church, pulsing with the heart of Jesus.

Sincerely,

A handwritten signature in black ink that reads "Pastor Chris Kramer". The signature is fluid and cursive, with the first name "Pastor" written in a slightly larger, more prominent script than the last name "Kramer".

Pastor Chris Kramer
Nativity Lutheran Church
60850 Brosterhous RD
Bend, OR 97702.

www.nativityinbend.com

Other Partners

- **HIV Alliance**
(HIV and HepC testing)
- **Dental Van**
- **Bay Area First Step**
(substance use recovery)
- **Coast Community Health**
- **AA/NA**

... and more! Ask the Advocacy Team for current schedules and available services.



Church Schedule

OFFICE & OUTREACH HOURS:

- Mon.: 9 a.m. – noon
- Wed.: 9 a.m. – noon
- Fri.: 9 a.m. – noon

WORSHIP SERVICES:

- Wednesdays at noon
- Sundays at 10 a.m.

Prayer and chaplain support is always available—just ask!

No religious participation is required to access St. Timothy's outreach and advocacy programs.

St. Timothy's



ST. TIMOTHY'S EPISCOPAL CHURCH

401 Fir Street
Brookings, OR 97415
(541) 469-3314



Community Kitchen Schedule

DAY	LOCATION	TIME
Mon.	St. Timothy's	noon
Tues	St. Timothy's	noon
Wed.	Star of the Sea Catholic	noon
Thurs.	Brookings Presbyterian	noon
Fri.	Trinity Lutheran	noon
1st, 3rd, 5th Sat.	St. Timothy's	noon
2nd, 4th Sat.	Brookings Nazarne	noon
Sunday	St. Timothy's	4 p.m.

The Community Kitchen provides a warm meal and fellowship to all who come to dine, at no cost.



Community Outreach & Advocacy

Hours: Mondays, Wednesdays, & Fridays, 9 a.m. – noon.

SERVICES AVAILABLE:

- Showers (towels included)
- Hygiene supplies
- Laundry vouchers
- Clothes closet
- Coffee, tea, breakfast, and snacks
- Mail pick-up
- Read, relax, socialize, charge phone

ADVOCACY TEAM SUPPORT & RESOURCE NAVIGATION

- Birth Certificates & IDs
- Health insurance enrollment
- Medical Coordination
- Treatment & Therapy referrals for substance use & mental health
- Applications: jobs, housing, disability insurance
- Assisted Living placement
- Transportation to reunite with support

Legal Aid

No cost appointments are available to people living in vehicles or sleeping outdoors who have questions about:

- Citations for sleeping, parking, or camping
- Sweep notices
- Getting your property back after a sweep
- Fines and fees for court
- Driving license reinstatement
- Expungement of criminal records or housing records (evictions)
- Turning 65 and receiving supplemental “top-off” income up to about \$840 (SSI)
- Using or extending a Housing Choice Voucher (HUD/Section 8)
- Food stamp (SNAP) benefits

Healthcare assistance

Family Nurse Practitioner Karla treats AllCare members at no cost to the patient. We can help you enroll in AllCare and schedule an appointment with Karla for medical care. This service fills a need for those in our community who would normally not seek a doctor's care or would use emergency services for treatment.

St. Timothy's



AUTHORIZATION TO RELEASE INFORMATION

St. Timothy Episcopal Church
Attn: Sister Cora Rose, Advocacy Team
401 Fir Street, PO Box 1237
Brookings, OR 97415
Fax & Telephone: (541) 469-3314

I authorize and consent to release and disclosure of all information, records, instruments, and documents requested on my behalf between **Legal Advocacy ministry of St. Timothy Episcopal Church, Rev. Sister Cora Rose, Esq.** and

I authorize disclosure of my information by hard copy to: **PO Box 1237, Brookings, OR 97415** and/or electronically by fax: **(541) 469-3314** or by email:

I am aware that the information disclosed may be protected by federal or state law, and I specifically consent to the disclosure of such information.

- This release extends to any of St. Timothy Advocacy ministry's agents designated to act on its behalf.
- A scan or photocopy of this release shall have the same force and effect as the original.
- The term of this authorization is 1 year from the date of signature, below, or until:

I specifically consent to release of information concerning:

- ☐ Health, including mental, behavioral, substance use, or treatment:
- ☐ Genetic information
- ☐ Contagious disease (such as Hep. C, HIV/AIDS, etc.)
- ☐ Legal/Court records
- ☐ Other:

Additional Notes:

Dated:

Signature

Date of Birth:

Printed name:

Record Number, if applicable (case #, DL#, patient #):

Phone # where okay to leave a message:

Mailing address:

OFFICE USE ONLY

Date Reviewed:

Conflicts Cleared:

St. Timothy Legal Advocacy Ministry Referral
What Are You Seeking Legal Help With?

Fines, Fees, Court Records

- ☐ **Citations** for sleeping, parking, or camping
Date given: _____ Court date: _____
Circle one: Brookings Municipal Court Curry County Court (Gold Beach)
Federal Court (Medford - for National Forest)
- ☐ **Sweep** notice
Date posted: _____ Date of Sweep: _____
Circle one: Curry Sheriff Brookings Police ODOT
National Forest State Parks
- ☐ Getting your property back after a **sweep** Date taken: _____
Who Took It: Curry Sheriff Brookings Police ODOT
National Forest State Parks
- ☐ **Fines** and fees for court Which Court? _____ How much \$? _____
Year of case: _____
- ☐ Oregon driving **license** reinstatement
- ☐ **Expungement** of Oregon criminal records or tenant records (evictions)
Do you owe \$ on judgment? Y/N How much: _____
Year of judgment: _____

Public Benefits

- ☐ Turning 65 and receiving supplemental "top-off" income up to about \$840 (**SSI**)
- ☐ Using or extending a Housing Choice Voucher (HUD/**Section 8**)
- ☐ Problem with food stamp (**SNAP**) benefits
- ☐ Medicaid (Oregon Health Plan) denial
- ☐ In-home **caregiver** approval
Circle one: I need a caregiver I want to work as a caregiver

Who else is involved in your problem? _____
(Examples: Park name, roommate, landlord, ex-partner, named victim in court case)

1 sentence: What is the legal help outcome you hope for?

Legal Advocacy Ministry

St. Timothy's



Do you have questions about:

- A **citation** for sleeping, parking, or camping
- A sweep **notice**
- Getting your property back after a **sweep**
- Reinstating your **driving license**
- **Expungement** of criminal records or housing records (evictions)
- Already **age 65+** but not receiving supplemental "top-off" income up to about \$914



How:

1. Do an intake with a community health worker (find one at CORE, St. Tim's, Coast Community Health, and Food Bank) and mention you would like to talk with the attorney about one/some of these topics
2. Fill out a 1-page info sheet about your goal, including your best contact info

St. Timothy Episcopal Church: 401 Fir Street, Brookings, OR 97415 M,W,F 9AM -12 noon
CORE: Harbor Shopping Center #31 (near BudMart/DMV) M-Thurs 9AM - 3PM (541) 251-0825



PUBLIC COMMENT FORM

Please turn in this form completed prior to the start of the meeting. Comments will be limited to five (5) minutes and restricted to the topics indicated below. All remarks and questions must be addressed to the presiding officer only. Comments must be respectful, harsh and/or abusive language will not be permitted.

I would like to comment on:

☒ Agenda Item #: 4.2 ☒ in support of ☐ in opposition to ☐ as an interested party

Item Title: File No. App - 1-23, appeal of Planning Commission of Notice of

☐ **An Item NOT on the Agenda** Abatement to St. Timothy's Episcopal Church
(Under "Oral Requests" - briefly describe subject):

Name: ^{Rev.} David Hunter

Address: 945 Helen Ln. Phone: (541) 499-2459

Organization (if applicable): _____

7/13/2023

To the Brookings City Council

As a pastor (PCUSA - retired) who served three congregations with diverse needs and opinions for 42 years, I understand, and appreciate, the difficult job you have serving our community as our elected representatives. I have been a resident of Brookings since January 2007 when I moved here to be the pastor of Brookings Presbyterian Church. Although I retired in November 2020, and am no longer the pastor of BPC, my wife and I continue to live here and enjoy our involvement in the life of the greater Brookings community.

Throughout the course of my residency here St. Timothy's has been involved in ministries of compassion and outreach. As well as BPC and several other churches, St. Timothy's offered rent, utility, food and fuel assistance to residents and occasionally those passing through. Already involved in these acts of caring, they were the first church to open their doors to the Community Kitchen program in 2009. That this ministry is a needed and valued service to Brookings residents and guests led BPC to join the CK team in 2011. The importance of this program was also recognized by our regional governing body, The Presbytery of the Cascades, who gave the overall Community Kitchen program and St. Timothy's Medical Outreach program a grant in 2012.

I recognize that the growing presence of homelessness in our nation and community creates discomfort for those that see it daily. I wish I could offer solutions, but this issue is complex and greater than just a local one. Instead, I must respond with my perspective on the question of whether St. Timothy's Episcopal Church, and other churches in our community, should be involved in offering care and compassion to those in need as a part of their "Spiritual Worship." For Christians, "worship" is not just what we do for one hour each Sunday, but rather how we live and express our faith 24/7. (*Romans 12:1 & Addendum 1*)

God's word in numerous places, like Matthew 25:31-46 and Ezekiel 34:11-16, makes it clear that it is the responsibility of God's people to care for the weak, poor, and helpless. In fact, according to God's word, we will be judged according to our faithfulness, not our words, in this regard. As members of the City Council, you may not believe in God, or care in the least what the Bible says; that is your right. What I would like you to recognize, however, is that for those who do seek to honor God and obey God's word, caring for the poor is a duty, not an option, and therefore one of the

essential functions of being faithful to what Christians believe we are called to do, as well as being at the heart of the Church's mission. (See Addendum 2)

Must congregations like St. Timothy's take on the burden of such ministries? In an ideal world this would not be necessary. If our community offered solutions to help with food, shelter, and other services at a location better suited to the needs of all our community that would be great. While the problem of caring for the poor is an issue that should be the responsibility of every one of God's children, whether they recognize God or not, the simple fact is that when the larger community refuses to act, the Church, and individual congregations, must respond and be faithful because "our city doesn't know what to do" is not an excuse. Therefore, the mission and outreach programs of St. Timothy's and other Community Kitchen congregations are an essential act of ministry, which is at the center of Spiritual Worship, as they seek to honor and serve God by responding to Christ's command.

David Hunter (Pastor PCUSA, Retired)



Addendum 1:

In case you wonder if my inclusion of ministries of caring in the fulfillment of worship above is merely that of one Presbyterian pastor, I include the following citations from **The Book of Order (2023-25)**, which is a part of the Constitution of the Presbyterian Church (PCUSA). The "W" reference shows that the excerpts are taken from the section titled **"The Directory for Worship"** which defines and orders worship for Presbyterian churches. (Bold and italics added for emphasis.)

W-3.0503 Service in the World

Christian worship and service does not end at the conclusion of the Service for the Lord's Day; we go forth to love and serve the Lord in daily living. In so doing, we seek to fulfill our chief end: to glorify and enjoy God forever.

W-5.03 WORSHIP AND THE CHURCH'S MISSION IN THE WORLD

W-5.0301 The Church's Mission in the World

God sends the Church in the power of the Holy Spirit to join the mission of Jesus Christ in service to the world. ***Jesus' mission and the church's worship are deeply connected; indeed, worship is mission.*** The church's mission springs from its worship, where we glimpse the reality and the promise of God's eternal realm. The church's mission flows back into worship as we bring to God the joy and suffering of the world. Through its mission in the world, the church seeks to bear witness to God's reign through the proclamation of the gospel, acts of compassion, work for justice and peace, and the care of creation. The church's mission is shaped and nourished by the Word and Sacraments, and represents the living out of our prayer for the world (F-1.01; F-1.0303; F-1.0304).

Addendum 2:

The following quotations come from the first section of **The Book of Order (2023-25)** a section titled **“The Foundations of Presbyterian Polity”** (meaning the principles upon which our denomination is established). In this section the identity and mission of the Church is discussed. These quotations answer the question of the place of ministries of caring and compassion in the Church’s mission and identity.

F-1.0302d The Marks of the Church (3rd & 4th paragraph)

The Church strives to be faithful to the good news it has received and accountable to the standards of the confessions. The Church seeks to present the claims of Jesus Christ, leading persons to repentance, acceptance of Christ alone as Savior and Lord, and new life as his disciples.

The Church is sent to be Christ’s faithful evangelist:

- making disciples of all nations in the name of the Father, the Son, and the Holy Spirit;
- **sharing with others a deep life of worship, prayer, fellowship, and service;**
- **and participating in God’s mission to care for the needs of the sick, poor, and lonely; to free people from sin, suffering, and oppression; and to establish Christ’s just, loving, and peaceable rule in the world.**

F-1.0304 The Great Ends of the Church *(originally adopted in 1910 with later language updates)*

The great ends of the Church are:

- the proclamation of the gospel for the salvation of humankind;
- the shelter, nurture, and spiritual fellowship of the children of God;
- the maintenance of divine worship;
- the preservation of the truth;
- the promotion of social righteousness;
- and the exhibition of the Kingdom of Heaven to the world

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WE ACTIVELY PROVIDE SUPPORT SERVICES THROUGH ACCOMPANIMENTS, KNOW YOUR RIGHTS (KYR) TRAINING FOR IMPACTED COMMUNITIES, AND EMPLOYERS, AND SUPPORT IMMIGRANT COMMUNITY GATHERINGS TO STRATEGICALLY DEVELOP METHODOLOGIES FOR CHANGE TO POSITIVELY IMPACT OUR IMMIGRANT COMMUNITIES. IT IS THROUGH THESE VARIOUS EDUCATIONAL OPPORTUNITIES AND TRAINING THAT WE ARE ABLE TO SUPPORT THE FREEDOM FOR AFFECTED COMMUNITIES TO LIVE IN PEACE WITH THE KNOWLEDGE OF THEIR RIGHTS, HOW BEST TO ASSERT THOSE RIGHTS, AND TO CONNECT THEM TO ORGANIZATIONS THAT CAN STEP IN TO

SUPPORT THEIR NEEDS WHEN CALLED UPON. WE WORK CLOSELY WITH IMMIGRANT YOUTH TO ENSURE INTERGENERATIONAL KNOWLEDGE SHARING AND CAPACITY BUILDING.

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- **ACCOMPANIMENT SERVICES**
- **KNOW YOUR RIGHTS PRESENTATIONS**
- **EDUCATIONAL PRESENTATIONS TO THE PUBLIC**
- **WORK WITH COALITION PARTNERS TO ADDRESS STATE AND LOCAL POLICY CHANGES BY MEETING WITH ELECTED OFFICIALS, LAW ENFORCEMENT AND COLLABORATE WITH TRUSTED PARTNER ORGANIZATIONS ON LEGISLATIVE WORK TO SUPPORT THESE POLICY CHANGES.**

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CENTRAL WASHINGTON JUSTICE FOR OUR NEIGHBORS, 210 NORTH RUBY STREET,
ELLENSBURG, WA. 98926, & 209 E BIRCH STREET, WALLA WALLA, WA. 99362, UNITED
STATES (509) 300-1101 INFO@CWJFON.ORG ([MAILTO:INFO@CWJFON.ORG](mailto:INFO@CWJFON.ORG))

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(<https://www.administerjustice.org/>)

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Leading your church to do justice can be simple.

We'll show you how.

Our Gospel Justice Centers make it easy to provide legal ministry for the vulnerable in your community with immediate impact and lasting transformation. Learn how to host one today and lead your church to **do justice**.

SCHEDULE A DISCOVERY CALL ([HTTPS://CALENDLY.COM/EODONNELLAJ/LETS-CONNECT](https://calendly.com/eodonnellaaj/lets-connect))

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Join us for our Open the Gates Gala | **Register Today**
(<https://www.administerjustice.org/openthegates/>)
This is what the Lord Almighty said:

Administer true justice,

(<https://www.administerjustice.org/>)
show mercy and compassion to one another. Do not oppress the widow or the
fatherless, the foreigner or the poor.'
([HTTPS://WWW.ADMINISTERJUSTICE.ORG/GETHELP/](https://www.administerjustice.org/gethelp/))
Zechariah 7:9-10



Seeking justice for the vulnerable can be overwhelming, time-consuming, and divisive. It doesn't have to be.

For over 20 years we have helped pastors equip their congregation to seek justice for the vulnerable with our simple no-cost turnkey model.

Are you struggling with:

- ✓ Discipling your church in doing justice without being political?
- ✓ How to connect with your community to serve in relevant and relational ways?
- ✓ Young people leaving the church because they view it as apathetic to the needs of the vulnerable?

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Three Steps to Launch a Gospel Justice Center in Your Church



1. Schedule a Conversation (<https://calendly.com/eodonnellaj/lets-connect?month=2022-06>)

Connect with a team member to explore hosting a Gospel Justice Center.

SCHEDULE A DISCOVERY CALL ([HTTPS://CALENDLY.COM/EODONNELLAJ/LETS-CONNECT](https://calendly.com/eodonnellaj/lets-connect))



2. Identify a Justice Champion

Identify the lead volunteer that will launch the Gospel Justice Center and build the volunteer team.
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(<https://www.administerjustice.org/>)

FIND A JUSTICE CHAMPION
(<https://www.administerjustice.org/gethelp/>)
(<https://www.administerjustice.org/church-leader-toolbox/find-a-jc/>)



3. Launch and see lives transformed

Open your church to clients and provide the help of a lawyer and the hope of God's love.

CLICK HERE FOR THE FULL PROCESS CHECKLIST
(<https://www.administerjustice.org/getstarted/>)

Your Church Can Help Solve the Access to Justice Problem

Get Legal Help (/gethelp) | Call Us Today **(855) 818-4554 (tel:8558184554)**
Explore Gospel Justice – For Churches

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(<https://www.administerjustice.org/>)

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([HTTPS://WWW.ADMINISTERJUSTICE.ORG/GETHELP/](https://www.administerjustice.org/gethelp/))



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There's a massive civil justice gap in America – low-income neighbors can't get basic legal advice.

The opportunity for churches to make a difference is huge.

Get Legal Help (/gethelp) | Call Us Today **(855) 818-4554 (tel:8558184554)**

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(<https://www.administerjustice.org/openthegates/>)



Ranking (<https://worldjusticeproject.org/rule-of-law-index/country/2021/United%20States/Civil%20Justice/>) of America's access and affordability of civil justice in a list of 140 countries.

A large, bold, red '92%' is displayed. Above the percentage, there is a blue diagonal line that starts from the left and ends with an arrowhead pointing towards the top right.

Percent of legal issues facing low-income Americans (855) 818-4554 (tel:8558184554)
(https://justicegap.lsc.gov/the-report/) are not addressed fully.
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(https://www.administerjustice.org/)

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<0.1%

Percentage of the 384,000 churches in America providing legal help to the most vulnerable in their community.

True Justice Requires the Local Church

Gospel Justice Centers bring together attorneys and caring volunteers to empower vulnerable neighbors with the help of a lawyer and the hope of God's love so that lives are transformed in the name of Christ.

Administer Justice has pioneered Gospel Justice Centers that provide a simple turnkey model for getting started in legal ministry for the poor. This will ignite your congregation around biblical justice and impact the lives of clients and volunteers.

We know pastors are busy and need to focus their energy on preaching and shepherding their congregation. Gospel Justice Centers allow churches to SIMPLY do justice in their community. Over 80,000 clients have been helped by

the local church and new churches are opening centers for every 855-818-4554

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(<https://www.administerjustice.org/>)

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OUR COMMUNITY IMPACT GUARANTEE

If you host a center, your church will have vulnerable neighbors walking through your church doors every month to receive legal help and gospel hope.

Get Legal Help (/gethelp) | Call Us Today (855) 818-4554 (tel:8558184554)
SCHEDULE A DISCOVERY CALL ([HTTPS://CALENDLY.COM/EODONNELLAJ/LETS-CONNECT](https://CALENDLY.COM/EODONNELLAJ/LETS-CONNECT))

Join us for our Open the Gates Gala | **Register Today**
(<https://www.administerjustice.org/openthegates/>)

Lead your congregation in a ministry that transforms your community.



- ✓ Share the love of God and impact your community
(<https://www.administerjustice.org/>)
- ✓ Open the doors of your church to vulnerable neighbors
([HTTPS://WWW.ADMINISTERJUSTICE.ORG/GETHELP/](https://WWW.ADMINISTERJUSTICE.ORG/GETHELP/))
- ✓ Unite your church around Gospel Justice



Hear from Pastors Who Have Followed the Call to Do Justice

*"I was not expecting Administer Justice to be such a focal point for enthusiastic service for the Lord's work in our church. There is a buzz on the Saturdays that our center is serving our community. After our first day, at the very next worship service, **one of our clients showed up to worship with us.**"*

Pastor Bill Calvin
Bloomington, IL

*"There is certainly no reason for our churches to reinvent the wheel. It would have been very difficult to do this from scratch. Administer Justice has a proven track record and a very qualified team. They have created a **plug and play system** that made it very easy to implement a much needed low cost legal aid program out of our church."*

Pastor Dave Short
Monee, IL

*"Here at Calvary Memorial, we are so grateful to participate in God's mission in partnership with Administer Justice. **The Legal Center has been an opportunity to be present in our community and to express the love of Christ in a tangible way.** The experience of hosting a Legal Center has shaped the lives of the members of the team and the church by giving us a refreshed perspective on what it means to **"Do justice, love mercy, and walk humbly with God."***

Pastor Manfred Karolyi
Oak Park, IL



The Call to Gospel Justice

Download our PDF to learn more about the need, the Gospel Justice Center model, and find answers to common questions. Take the next step to do justice.

[DOWNLOAD PDF \(\)](#)

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X



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OUR NEWSLETTER**



READY TO FOLLOW THE CALL TO DO JUSTICE?

Take the first step to launching a Gospel Justice Center in your church. Schedule a call today with a team member to learn more.



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OUR NEWSLETTER**



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FAQ

Below you'll find answers to some common questions about Gospel Justice Centers.
Schedule a meeting to have more of your questions answered.


What is a Gospel Justice Center?



Does our church leadership have to recruit volunteers?	Get Legal Help (/gethelp) Call Us Today (855) 818-4554 (tel:8558184554)	+
Does our church leadership have to recruit a volunteer attorney?	Join us for our Open the Gates Gala Register Today (https://www.administerjustice.org/openthegates/)	+
Is our church taking on liability?	 (https://www.administerjustice.org/)	+
Will the volunteer attorneys take cases to court?	GET LEGAL HELP (HTTPS://WWW.ADMINISTERJUSTICE.ORG/GETHELP/)	+
Are there limits on the type of legal issues?		+
How do people find out about our center?		+
Why are clients asked to pay a \$30 copay to visit the center?		+
What if someone cannot afford a \$30 copay?		+
Does the church need to provide the \$5000 fee to launch a center?		+
What space and equipment does a church need to host a center?		+
Are there any ongoing costs to the church for the center?		+




Don't waste your time:

- ✓ Exploring different ministry models that serve the poor but rely on time-consuming pastoral leadership
 (https://www.administerjustice.org/getlegalhelp) Call us today (855) 818-4994 (tel:8558184994)
- ✓ Trying to motivate your congregation to make a difference in your community without direction and a plan
 Join us for our Open the Gates Gala | **Register Today**
 (https://www.administerjustice.org/openthegates/)
- ✓ Starting an unsustainable ministry that requires too many volunteers and resources

 (https://www.administerjustice.org/)

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 (https://www.administerjustice.org/getlegalhelp)

We know you understand God's heart for justice and righteousness and want to lead your congregation in pursuing that. Do justice in your community with our help. Administer Justice equips you to get started in vital legal ministry in as little as two months with a small group of volunteers.



SCHEDULE A DISCOVERY CALL (HTTPS://CALENDLY.COM/EODONNELLAJ/LETS-CONNECT)

The Impact of Gospel Justice Centers

(https://www.youtube.com/watch?v=EReQLixh1Zg)



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(<https://www.youtube.com/watch?v=xGLBP430wzI>)
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(<https://www.youtube.com/watch?v=g7UWN7Zpx44>)



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Volunteer Hub (<https://www.administerjustice.org/volunteerhub/>)

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Church Leader Toolbox (<https://www.administerjustice.org/church-leader-toolbox/>)
(https://www.administerjustice.org/openthegates/)

Partnership Toolbox (<https://www.administerjustice.org/partnership/>)

Webstore (<https://www.jhfulfillment.com/AJ>)
Administer Justice
(<https://www.administerjustice.org/>)

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Church Leader (<https://www.administerjustice.org/churchleader/>)

Volunteer (<https://www.administerjustice.org/volunteer/>)

Donor (<https://www.administerjustice.org/give>)

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Founding Story (https://www.administerjustice.org/about/#_foundingstory)

Board of Directors (https://www.administerjustice.org/staff/#_directors)

Job Opportunities (<https://www.administerjustice.org/hiring/>)

Contact Us (<https://www.administerjustice.org/contact/>)



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(<https://www.administerjustice.org/gethelp#locations>)



(<https://www.administerjustice.org/gethelp#locations>)

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(<https://www.workplaces.org/>)

(<https://analytics.administerjustice.com/overview>)



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About the Clinic



**Pope Francis
Legal Clinic**
Free Legal Consultation

Mission Statement

The Pope Francis Legal Clinic provides free legal consultations for people in the Diocese of Oakland and elsewhere to consult our legal experts about cases which are affecting their lives. Our experts are imbued with the spirit of Christ and His Church, in the way they approach legal problems. It is the practice of the clinic to rely upon the theological tradition of the Roman Catholic Church, its virtues and divine mercy.

Vision Statement

The Pope Francis Legal Clinic functions as a place of mediation and reconciliation. Expert lawyers with outstanding legal training and experience are available to meet with people burdened with legal problems, who want reconciliation, and resolution. The counsel offered by this clinic involves more



advice and 10% hope, while serving as a lens to the modern world view, which is increasingly legalized.

Strategic Goals:

- Develop a culture of legal excellence based on the principles of practical wisdom imbued with mercy
- Enhance relations between persons of the Diocese, their families, and neighbors
- Enhance reliance and trust upon the Church by providing a place for meditation and reconciliation, in regards to issues which are not otherwise being addressed, through the support and wisdom of volunteer legal attorneys
- Enhance the love of God through His Church and the Church's teachings of the natural law

HOURS

Tuesdays: 10:00 am - 2:00 pm
Thursdays: 10:00 am - 2:00 pm

The Cathedral of Christ the Light - 2121 Harrison Street - Oakland, CA 94612-3788 - (510) 832-5057 - cathedral@oakdiocese.org

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How We Help

Immigration Law & Justice Network (ILJ Network) provides free or low-cost legal counsel, support services, and advocacy for immigrants, refugees, and asylum-seekers, without regard to race, religion, ethnicity, ideology, gender identity, or sexual orientation.

We work alongside immigrants so they can attain authorization to work and live with dignity, reunite with their families after years of separation, and escape horrific violence to find refuge here in the United States.

Because we recognize that every person needs—and deserves—to feel a sense of trust, welcome, and belonging, our clients represent different faiths, races, traditions, and educational and professional backgrounds—each of them reflecting the powerful diversity of our cities, towns, and communities.

Committed to Justice



Our Services

ILJ Network supports **19 locally operated sites** (<https://iljnetwork.org/i-need-help-consigue-ayuda/>) that collectively serve over 5,000 low-income immigrants, refugees, and asylum-seekers each year. ILJ attorneys work with clients through referrals and scheduled appointments. We also currently host over 50 free or low-cost immigration legal clinics, most of them held in churches and other community settings.



ILJ Network serves as the backbone for all of our ILJ sites. We provide strategic support to immigration attorneys, volunteers, staff, and boards of directors to offer more effective immigration legal services to low-income immigrants. We also oversee the expansion of the network to welcome new sites in areas of high need. By working together with our sites, ILJ Network helps them provide expert immigration legal services and achieve a larger collective impact than they could ever realize on their own:

Ensuring consistent high-quality, effective immigration legal services across the network

- We ensure excellence among ILJ sites with procedures to evaluate, monitor, measure achievements, and provide a mentoring program for staff attorneys. We hold sites accountable for providing excellent services through, among other things, a *Memorandum of Understanding*. We offer hands-on assistance to start-up sites, including in-person visits from ILJ Network staff, working with them to develop leadership, raise funds, and implement compassionate and successful legal programs and clinics.
- We facilitate exceptional legal services through attorney mentorship, trainings, and frequent communications on the issues of governance, programming, and fundraising. This helps ILJ sites implement best practices in all facets of their work.
- We foster opportunities for staff, board members, and volunteers to learn from one another and share ideas through in-person gatherings, attorney calls, listservs, and an internal website with hundreds of documents for shared use. As a result, our staff becomes more knowledgeable and effective in carrying out their mission of providing life-changing immigration legal services.

Brokering national resources for local support

- We provide financial support that focuses on sustainability and resource-sharing through opportunities such as matching grants and innovation funds. Sustainable sites are key to ensuring that clients are continuously represented until a positive outcome is achieved.
- We reduce overhead expenses of local sites by covering critical items such as malpractice insurance, case management systems, research databases, and memberships in the immigration field and nonprofit community. This allows sites to focus their resources on serving clients.

Increasing public awareness of immigrant needs and services to address those needs

- We promote the Immigration Law & Justice brand through communications that tell the stories of our clients and our work on their behalf. This enables sites to grow and helps potential clients become aware of the services available to them.
- We advocate for immigrant rights and immigration reform using our collective voices from across the country, representing the hopes, struggles, and experiences of our many and diverse immigrant clients. This fosters more widespread advances for the immigrant community that cannot be achieved through direct services alone.

Case Types

ILJ Network's staff attorneys and teams of volunteers provide in-depth immigration legal assistance to low-income immigrants and their families. Our most common case types include:

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Immigration
Law & Justice (/)
Network

Advice and Counsel

Asylum

Citizenship

Deferred Action for Childhood Arrivals (DACA)

Deportation Defense

Family Petition

Refugee Adjustment of Status

SIJ (Special Immigrant Juvenile Status)

U Visa

VAWA (Violence Against Women Act)



Newsletter Sign Up

Sign up to receive our monthly newsletter

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LAST NAME

YOUR EMAIL

SIGN UP

Key Pages

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— [How We Help\(/what-we-do/how-we-help\)](#)

— [Newsroom\(/what-we-do/newsroom/\)](#)

[Who We Are](#)

— [Our Purpose\(/who-we-are/our-purpose/\)](#)

— [Staff & Board\(/who-we-are/staff-board/\)](#)

— Our History(/who-we-are/our-history/)

— Contact(/who-we-are/contact/)

Our Endowment Fund(/our-endowment-fund/)

[DONATE \(HTTPS://NJFON.KINDFUL.COM\)](https://njfon.kindful.com)



Pages

Member Portal(<https://jfonhub.org>)

Donate(<https://njfon.kindful.com>)

National Headquarters

7630 Little

River

Turnpike,

Ste. 900 (https://www.google.com/maps/place/7630+Little+River+Turnpike+%23900,+Annandale,+VA+22003/@38.83387,-77.210945,17z/data=!77.2087563)

Annandale,

Virginia,

22003

(+1) 703-766-0442(tel:(+1)%20703-766-0442)



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(https://www.youtube.com/channel/UC5n-Qnfpw6lruM37ZITiUsQ?view_as=subscriber)

Immigration Law & Justice Network is a 501(c)(3) non-profit organization. Our tax identification number is 45-4044201.

Contributions may be tax deductible.

United Methodist Church Advance #901285 (<https://umcmmission.org/advance-project/901285/>).

We are members of AILA (<https://www.aila.org/>) (American Immigration Lawyers Association), CLINIC

(<https://cliniclegal.org/>) (Catholic Immigration Legal Network), and NIPNLG

(<https://www.nationalimmigrationproject.org/>) (National Immigration Project of the National Lawyers Guild.)

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(<https://staging3.iljnetwork.org/what-we-do/privacy-policy/>).

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Join Immigrant Hope



Immigrant Hope is a network of church-based immigration legal aid clinic. We help local churches to set up and run these clinics as part of their outreach to immigrants in their community. We believe that by providing excellent legal services,

churches can show their immigrant neighbors the love of God, build relationships based on trust, and open doors to share the Gospel and make disciples.

Immigrant Hope currently provides:

- A commitment to working through churches, serving the vulnerable, and sharing the gospel in word and deed
- A roadmap for opening and running an immigration legal service center

- Legal training, such as IMMIGRANT PATHWAY Institute, tailored to the specific needs of Immigrant Hope workers
- Inclusion in our 501(c)(3) group tax exemption
- Help completing the application for Department of Justice (DOJ) Recognition and Accreditation
- Ongoing access to a legal support hotline and immigration law updates
- Templates and examples for office manuals, documents, and forms
- Use of Immigrant Hope name, logo, and branding
- Volunteer training curriculum
- Discounted training, setup, and operating costs for LawLogix immigration case management software
- Ongoing training and technical support for LawLogix, tailored to Immigrant Hope
- Space on the website and Immigrant Hope email addresses
- Opportunities to gain experience at other Immigrant Hope centers
- Help and resources for casting vision in your church and community
- Networking with other Immigrant Hope centers, both existing and in development

In the future, we plan to develop:

- Increasing national name recognition and legitimacy
- A legal support hotline tailored for Immigrant Hope
- Assistance with grant writing and fund raising
- A seed fund for new centers and expanding centers
- Mentoring relationships between new and existing centers

Cost of Immigrant Hope network membership:

\$1,500 one-time licensing fee, due when you are ready to open your legal office.

\$2,000 annual fee, beginning at the end of your first year of operation.

If you would like to learn more about becoming an Immigrant Hope center, request an application to become an Immigrant Hope center, or invite an Immigrant Hope staff member to speak to your congregation or leadership.

Find Help

Atlanta, Georgia (<https://www.immigranthope.org/location/atlanta-georgia/>)

Bloomington, Minnesota (<https://www.immigranthope.org/location/bloomington-minnesota/>)

Brooklyn, New York (<https://www.immigranthope.org/location/brooklyn-new-york/>)

Clifton, New Jersey (<https://www.immigranthope.org/location/clifton-new-jersey/>)

Gainesville, Florida (<https://www.immigranthope.org/location/gainesville-florida/>)

Mesa, Arizona (<https://www.immigranthope.org/location/mesa/>)

San Leandro, California (<https://www.immigranthopesl.org/>)

Santa Barbara, California (<https://www.immigranthope.org/location/santa-barbara-california/>)

South Central Pennsylvania (<https://www.immigranthope.org/location/scpa/>)

Wyoming/Idaho (<https://www.immigranthopewyomingidaho.org/>)

Get Involved

Join Immigrant Hope (<https://www.immigranthope.org/join-immigrant-hope/>)

Give (https://www.immigranthope.org/?page_id=3223)

Training (<https://www.immigranthope.org/get-training/>)

Resources (<https://www.immigranthope.org/resources/>)

Blog (<https://www.immigranthope.org/blog/>)

About Us

Mission & Vision (<https://www.immigranthope.org/mission-vision/>)

Statement of Faith (<https://www.immigranthope.org/statement-of-faith/>)

Frequently Asked Questions (<https://www.immigranthope.org/frequently-asked-questions/>)

Leadership (<https://www.immigranthope.org/leadership/>)

Contact

(612) 516-5422 (tel:6125165422)

info@immigranthope.org (mailto:info@immigranthope.org)

Facebook (<https://www.facebook.com/ImmigrantHope/>)

Twitter (<https://twitter.com/immigranthope>)

Newsletter Signup (<https://www.immigranthope.org/newsletter-signup/>)

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Faithful Partners

Iglesia de Dios Pentecostal M.I. Surprise

15808 N. Verde St.
Surprise AZ 85378
United States

Phone: (855) 818-4554

Hours of Service

867.8 mi

[Directions](#)

Northwest Community Church Legal Center

16615 N. 43rd Avenue
Phoenix AZ 85053
United States

Phone: (855) 818-4554

Hours of Service

874.6 mi

[Directions](#)

AZ Vineyard Church

255 N. Litchfield Road
Goodyear AZ 85338
United States

Phone: (855) 818-4554

Hours of Service

875.6 mi

[Directions](#)

Glendale Corps Justice Center

6010 W. Northern Avenue
Glendale AZ 85301
United States

Phone: (855) 818-4554

Hours of Service

877.1 mi

[Directions](#)

Mesa Citadel Justice Center

241 E. 6th Street
Mesa AZ 85201

United States

Phone: (855) 818-4554

Hours of Service

898.2 mi

Directions

Tucson Amphi Corps Gospel Justice Center

218 E. Prince Rd.

Tucson AZ 85705

United States

Phone: (855) 818-4554

Hours of Service

Second Saturday of the month

10:00am – 12:00pm

[Click here to learn more](#) and schedule your appointment for legal help.

994 mi

Directions

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Find a Local Affiliate

At the Catholic Legal Immigration Network, Inc., we're proud to work with passionate advocates who take up the cause of helping immigrants every day. We currently have over 420 affiliates across 49 states and the District of Columbia, fulfilling this important need. If you're looking for an affiliate near you, please use directory and filters below to locate one.

If you're an affiliate listed below and you need to update your information, please [use the affiliate support form](#).

Note: You'll need to be [logged into](#) the website.

Organization Name

State/Province ID

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[Apply](#)

Organization Name	Address	Phone
Catholic Charities of Oregon	2740 SE Powell Blvd. Portland, Oregon 97202	(503) 688-2640
Catholic Community Services of Lane County, Inc.	1025 G Street Springfield, Oregon 97477	(541) 345-3628
Immigrant and Refugee Community Organization (IRCO)	10301 NE Glison Street Portland, Oregon 97220	(503) 234-1541
Immigrant Connection - PDX	16700 NE Halsey Street Portland, Oregon 97230	971-202-2073
Immigration Counseling Service	519 SW Park Ave Suite 610 Portland, Oregon 97205	503.221.1689
Latino Community Association	2445 NE Division St., Ste 200 Bend, Oregon 97703	(541) 382-4366
Lutheran Community Services Northwest	605 SE Cesar E. Chavez Blvd. Portland, Oregon 97214	(503) 731-9539
Sponsors Organized To Assist Refugees (SOAR)	0245 SW Bancroft St, Suite B Portland, Oregon 97239	(503) 221-1054

Promoting the Dignity of Immigrants With Affordable Legal Expertise

As it has for more than 30 years, CLINIC will fight for the rights of immigrants. CLINIC trains legal representatives who provide **high-quality** and **affordable** immigration legal services. We develop and sustain a network of nonprofit programs that serve over 500,000 immigrants every year. We cultivate projects that support and defend vulnerable immigrant populations by:

- Providing direct representation for asylum seekers at the U.S.-Mexico border and educating them about their rights;
- Reuniting formerly separated families;
- Increasing legal representation for those in removal proceedings and in detention;
- Providing public education on immigration law and policies; and
- Advocating for fair and just immigration policies that acknowledge the inherent dignity and value of all people.

History has taught us that people who step up can make a difference. **We hope you will join us.**

[Make a Monthly Donation](#)

- It's quick and simple

Support a Scholarship

- Help representatives gain crucial training

About the Catholic Legal Immigration Network, Inc.

Embracing the Gospel value of welcoming the stranger, CLINIC promotes the dignity and protects the rights of immigrants in partnership with a [dedicated network](#) of Catholic and community legal immigration programs. We are based out of Silver Spring, Maryland (Washington, D.C. metropolitan area), with an office in Oakland, California, and additional staff working from locations throughout the country. Questions and inquiries can be sent to national@cliniclegal.org.

National Office

8455 Colesville Road, Suite 960
 Silver Spring, MD 20910
 Phone: (301) 565-4800
 Fax: (301) 565-4824

Stay Up-to-Date

[Subscribe to Our Email Lists](#)

Receive daily immigration news, agency updates, advocacy alerts and information about our latest trainings and resources. It only takes a moment to sign up.

Use Your Affiliate Benefits

If you are a CLINIC affiliate, be sure to regularly use your benefits. The page includes exclusive content and tools that will help you as a legal practitioner. Interested in learning more about affiliation? Read through our frequently asked questions to get started.

Additional Items

[Stories](#) | [Press Releases](#) | [Financials](#) | [Annual Reports](#)

[Catholic Identity](#) | [Other Ways to Donate](#)



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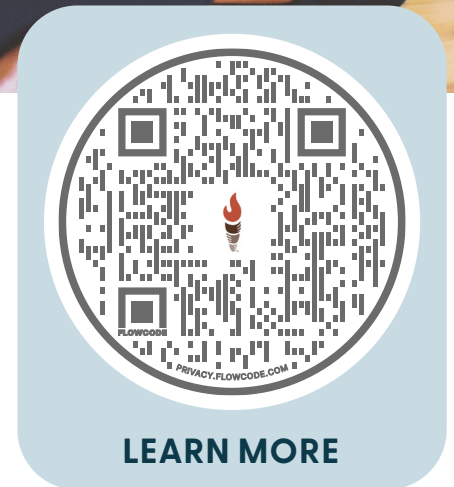
JUSTICE MADE SIMPLE



America is ranked **126th out of 139 countries** for accessibility and affordability of civil justice.¹

Low-income Americans do not get any or enough legal help for **92% of their civil legal problems**.²

Your law skills are **crucial to millions of Americans** facing confusing legal issues.



WHAT OUR VOLUNTEER ATTORNEYS ARE SAYING

"Serving has made me glad that I'm a lawyer."

"Fantastic way to merge my profession and my beliefs."

"Administer Justice helps me to help people who really have deep needs...a lot of the people I meet with at Administer Justice have nowhere to go."

1. 2021 Rule of Law Index, World Justice Project

2. The Justice Gap, 2022, Legal Services Corporation



Administer Justice

FREQUENTLY ASKED QUESTIONS

What is the expected scope of the legal services?

The attorney is not expected to go beyond the one-time 45-minute consultation. In that time, the attorney will coach clients so they are empowered to take the next steps themselves, and know what & how to take those steps. The attorney has the discretion to go further with the client, if desired, and will be covered by our malpractice insurance – up to but not including appearance in court.

What areas of law are covered?

Administer Justice is a **civil** legal aid and does not provide legal counsel for criminal cases.

What is expected of attorneys?

This is an opportunity for attorneys to integrate their faith and practice. They usually serve once a month for 3-4 hours, during which time they will meet with 3-4 individuals. They are NOT expected to be experts in any area of law the client presents or take a prolonged case in court.

The ABA and most state professional rules of responsibility provide encouragement to volunteer through a clinic (Rule 6.5 or 6.6 usually) which provides guidance on relaxed rules for conflict of interest and attorney-client relationship. Most states allow contractually limiting an appointment such that no attorney client relationship is created.

Administer Justice uses a client agreement based on ABA standards.

Are attorneys covered by malpractice insurance?

Yes. Administer Justice provides malpractice insurance for attorneys serving center clients, from the initial consultations through limited scope representation.

Do the volunteer attorneys litigate the clients' cases?

No. The malpractice insurance for a GJC does not cover court appearances.

Per Rule 6.1 of Model Rules of Professional Conduct, do volunteer hours count towards pro bono/public legal services?

Yes.

Does an attorney have to know poverty law?

No. The lawyer's role is to assess the circumstances and determine a plan for addressing the client's questions. Lawyers are uniquely qualified to do that. Most states have created excellent self-help resources which, while confusing for a client, are easy to navigate for a lawyer to help coach a client.

Lawyers can discuss facts with other lawyers on site and often arrive at a good plan for helping someone. Importantly, people are more than legal problems. The compassion, care and prayer offered by an attorney have significant impact.

The support team will assist with additional spiritual and social support.

2022 ANNUAL REPORT



Justice Made Simple.

Can justice be made simple? Yes. While law is complex and legal systems are broken, the Biblical call to do justice can be lived out simply.

For 23 years, Administer Justice has led the way in providing a simple model for churches, attorneys, and clients to seek justice and find freedom. As churches live outside their walls and attorneys serve outside their comfort, lives are changed. Neighbors receive a fresh perspective that both churches and attorneys are not primarily concerned about themselves but others. Gospel Justice Centers reflect Jesus to neighbors in need.

Donors like you also reflect Jesus. Others tell you to keep your hard-earned money and spend it on your desires. But you know all you have is a gift from God, and gladly share with others. By doing so you create a legacy. A legacy is not what you leave to someone, but what you leave in someone. You are leaving a legacy of justice in the lives of thousands of neighbors.

Jesus understood joy does not come from holding onto what we have – time, talent, or treasure. Joy comes from sharing all we have with ‘*one of the least of these.*’ In Matthew 25, Jesus makes this clear when he speaks of his return to establish his kingdom of justice and righteousness on the earth. He separates people like sheep and goats. Those who served the least of these are welcomed. They invested time, talent, and treasure wisely. *“Well done, good and faithful servant. You have been faithful over little; I will set you over much. Enter into the joy of your Master.”* Matthew 25:23.

As you see the impact of your giving in this report may you experience the joy of your Master who cares deeply for you, for justice, and for service to one of the least of these.

Mission

Empowering vulnerable neighbors with the help of a lawyer and the hope of God’s love.

Vision

One thousand Gospel Justice Centers transforming lives in the name of Christ.

Year in Numbers

3,374

Clients
Served

742

Volunteers
Serving

80

Gospel
Justice
Centers

15

States with
a Gospel
Justice
Center

93%

Clients
experiencing
a deeper
sense of
God's love

2022 was a year of expansion.

Access to justice remains unavailable for far too many Americans. As a nation that pledges liberty and justice for all, we should do better. As Christ followers who pursue a Kingdom whose foundation is justice and righteousness, we *must* do better.

Our vision is to change that. Imagine churches everywhere opening their doors on Saturday mornings to neighbors in need of legal help and gospel hope. That vision is happening.

In 2022 we added 36 new Gospel Justice Centers. When we began our campaign to see 300 Gospel Justice Centers by the end of 2025, we had 35 Gospel Justice Centers in primarily two states. At the end of 2022, we had 80 Gospel Justice Centers in 15 states! This expansion allowed us to serve many more clients through Gospel Justice Centers and to invite more volunteers, more attorneys, and more churches to do justice, love mercy, and walk humbly with God.

By the end of 2022, two major initiatives were finalized that will significantly expand impact in 2023. The first is a partnership with Prison Fellowship to serve the legal needs of children impacted by incarceration. Prison Fellowship has a new program supporting caregivers through Opportunity Kids which is part of their Angel Tree program. This partnership will launch in five major cities in 2023: Atlanta, Boston, Chicago, Dallas, and Houston.

The second opportunity is the publishing of my book, *Persevering Power*, by InterVarsity Press. It will be released at the Christian Community Development Association Conference in October. As I saw the challenges of isolation exacerbated by the pandemic resulting in mental and emotional health issues, I wanted to share foundational truths that helped me persevere through life's challenges. The book is a practical guide for those weary in doing good or overwhelmed by injustices around them.

As we look forward to 2023, we have several additional expansion opportunities to grow toward 300 Gospel Justice Centers transforming lives in the name of Christ. As we seek to expand access to justice and Jesus, we do so by faith. There is only one miracle recounted in all four gospels – the feeding of the 5,000. The lesson is for each of us to have the faith of a boy and gladly give what we have to be used by Jesus. In His hands, a law degree that seems small for so many legal issues becomes more than enough. A church that has too little bandwidth trusts Jesus to multiply in people His heart for justice. Donors give generously and see the impact multiplied.

Neighbors are hungry for justice. Let's demonstrate Jesus as we trust Him to multiply the opportunity to *'administer true justice and show mercy and compassion to those in need.'* Zechariah 7:9.



A handwritten signature in black ink that reads "Bruce D. Strom".

Bruce Strom
Founder & CEO



Justice Made Simple

For Clients

***“You feel they really care and
want God’s hand to guide you.
I felt very supported.”***

Rosita, Client

The Justice Gap

A major report released in 2022¹ showed that 92% of the legal problems of low-income Americans did not receive adequate help. At the same time, nearly three-quarters (74%) experienced at least one legal problem during the year and one third (33%) had at least one problem related to the COVID-19 Pandemic. Rising inflation placed more pressure on low-income households as they struggled to find help.

While legal problems are significant, our clients are more than problems to be solved. They are people to be loved. We make it simple for clients to schedule an appointment online or through our 800 number. One call can lead to freedom from crushing legal burdens.

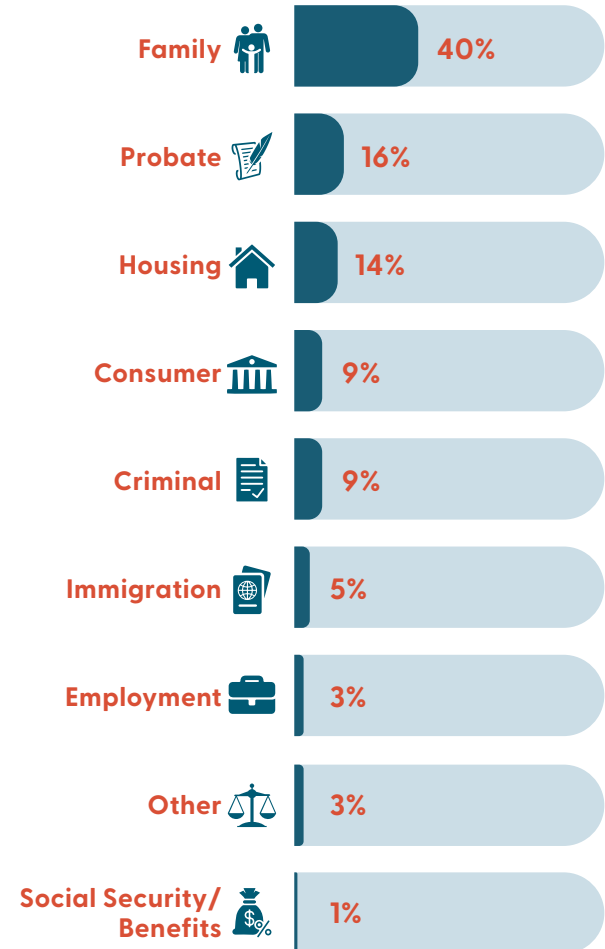
“Administer Justice is an organization that cares and provides for the whole person – from legal to spiritual to physical needs and I’m grateful for their expert advice and kindness.”

Dawn, Client

¹ Legal Services Corporation, The Justice Gap Report, 2022



In 2022, we helped 3,374 individuals in the following areas:



Client Satisfaction:

94%

Clients are satisfied with the legal guidance they receive.

93%

Clients report experiencing a deeper sense of God’s love.

Justice Made Simple For Attorneys

America has an access to justice problem.

In 2022, we ranked last in the developed world and 126th² globally for providing affordable access to justice.

Lawyers are expensive and one in three Americans simply cannot afford one.

While lawyers are encouraged to donate 50 hours a year to help neighbors in need, according to the American Bar Association only 20% do this.

Only
20%

of lawyers donate the ABA-recommended 50 hours a year

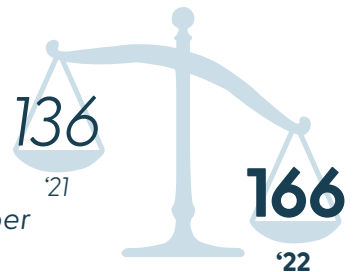
In most states a majority of lawyers do not provide free help and as the needs increased from the pandemic, fewer attorneys stepped in to help.

Not at Administer Justice.

In 2022, we saw a

22%

increase in the number of attorneys serving



And more than
30%
increase in value of Attorney in-kind services.

As the needs of vulnerable neighbors increased, Christian attorneys saw the need and met it. With simple training and support, we reduce barriers to serve to make it easier for attorneys to use their law degree for life-changing impact.

² WJP Rule of Law Index®, worldjusticeproject.org, 2022



“What the attorneys do is definitely from God. I could feel His spirit through everyone involved.”

Sylvia, Client

As our clients wrote:

“The lawyer was very professional yet friendly, which made me know my concern was important to her. I’ve used a free attorney before, and the person was distant and dry. I never doubted God’s love for me and my family but felt helpless in our situation... Administer Justice is the group we all speak of when we say we know there are good attorneys out there that are not volunteering just to have their resume look good for further promotions... Again, our Creator allowed our path to cross and I’m forever grateful. I slept good after our meeting.”

Jane, Client

“In other settings in the legal realm you might feel intimidated and believe your questions were too dumb to ask but the kind and gentle way in which your attorney communicates creates an atmosphere of safety to ask questions.”

Linda, Client



Justice Made Simple

For Churches

The church is called to seek justice

A study by Lifeway Research found more churches are closing than opening³ and a recent Gallup poll⁴ found for the first time in the poll's 80-year history, church membership among American adults has fallen below 50%.

The Pandemic accelerated a trend while destroying a critical component of the church – community. The resulting isolation only fueled anxiety and depression demonstrating the increasing need for faith, family, and a church community.

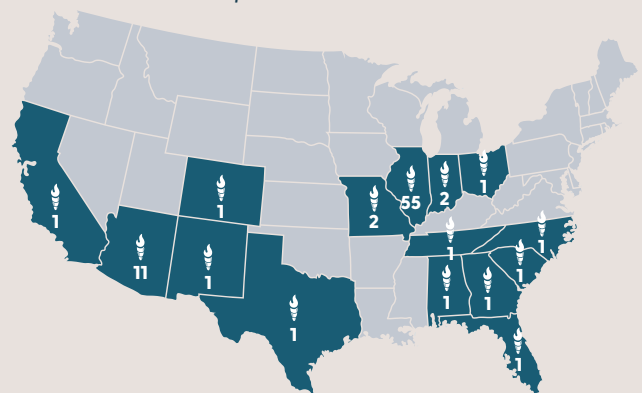
One way a church can engage its community is through a Gospel Justice Center.

In 2022 we added



new church centers.

*Bringing the number
of Gospel Justice Centers to*



80 in 15 states.

³ "Protestant Church Closures Outpace Openings in U.S.", Lifeway Research, 2021

⁴ "U.S. Church Membership Falls Below Majority for First Time", Gallup, 2021



At a time when neighbors are passing by the church, Gospel Justice Centers are welcoming them in.

As one client wrote,

“I felt that I was genuinely listened to and heard without judgment. I truly feel this was part of God’s plan for me because had I not been in the vicinity of the church. (It was not planned for me to be there that morning). I would not have seen the Administer Justice signs that compelled me to come inside the church and ask about the signs that almost did not get put out. I feel hopeful with my situation because I was made to feel that people care and are concerned about what happens to me. Thank you to everyone at the church.”

Sandra, Client

Administer Justice makes it simple for the church to do justice, love mercy, and walk humbly beside neighbors in need.

We make it simple for them to invite neighbors into the church by training their people and providing resources at no cost to the church.

Neighbors like Sherry, a grandma who feared for her six grandchildren as their mom struggled with alcohol, drugs, and abandoning them. The government was involved and threatened to remove the children. What could she do?

A friend told her about a church hosting a legal center. When she walked through the doors of the church everything changed. Her encounter with a loving team of people, guidance from an attorney, and practical help from others resulted in new hope, safety, and stability for the family.

Watch Her Story

AdministerJustice.com/AnnualReport2022



Justice Made Simple

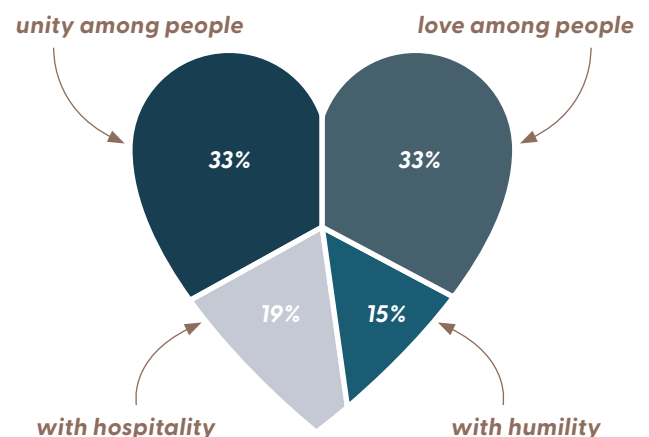
For Volunteers



The Power of One Another

The New Testament contains 100 “one another” commands. 33% deal with unity among people, 33% love among people, 15% with humility, and the remaining 19% with hospitality and service toward others.

*One Another commands
in the New Testament*



Gospel Justice Center volunteers demonstrate this unity, love, hospitality, and humble service toward neighbors in need. Reflecting Christ makes a significant difference.



As one client wrote,

“The people in this ministry are amazing and caring! I have never felt so truly heard and supported in my life. This is an extremely difficult time and you all have helped tremendously by being so kind and providing good information and resources.”

Christina, Client.

We make justice simple for volunteers by providing online, on-demand training through our AJ Academy.

Beyond training we support all volunteers through a new Volunteer Hub with numerous resources and a staffed help desk.

As one volunteer remarked, “Thank you for making this easy. Knowing that someone from AJ will be holding my hand through the process, means a lot.”

Administer Justice holds the hand of the volunteer as they hold the hand of their neighbor in need. Seeing the opportunity to love neighbors through legal ministry, 536 non-attorney volunteers served in 2022 – an increase of 79%!

Several volunteers shared the joy they experience as they love and serve one another.



**To hear their voices,
watch *The Gates*
are Opening at**

Administerjustice.org/AnnualReport2022

Justice Made Simple For Donors

Did you know that if you earned \$53,924 in 2022, you were in the richest 1.3% of the global population?⁵ We have been given so much and to whom much is given, much is expected. Our supporters reflect the generous heart of justice.

In Hebrew one word for justice is *Tzedek*. The word for generosity is *Tzedekah*. Generosity is rooted in justice. Whether a Torchbearer providing important monthly support, or a Torchlighter providing \$5,000 or more to open a self-sustaining Gospel Justice Center, our donors are investing in the kingdom work of justice.

“Good will come to those who are generous and lend freely, who conduct their affairs with justice.”

Ps. 112:5

⁵ <https://howrichami.givingwhatwecan.org/how-rich-am-i>

Torchlighter *One-time \$5,000 Gift*

Administer Justice works with churches in under-resourced communities who are eager to provide legal help to their neighbors, but perhaps the \$5,000 launch fee is out of reach.

Consider a one-time gift to set up a self-sustaining Gospel Justice Center in communities around the country.

Lifetime Impact:

\$5,000
investment

1
center funded

10
volunteers equipped

50
clients annually

\$24,000
returned annually in attorney time & client copays

Torchbearer *Monthly Gift*

When you become a Torchbearer your monthly gift ensures that the work of offering the help of a lawyer and the hope of God's love can continue.

Consider setting up a recurring gift to Administer Justice and become a Torchbearer today.

**Learn more at
AdministerJustice.org/give**

Financial Statements

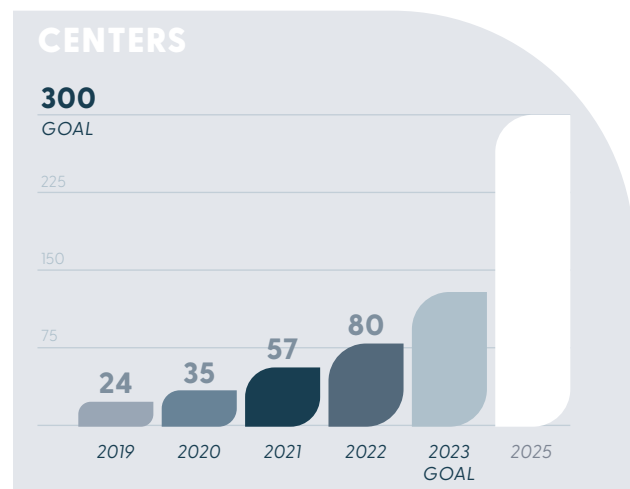
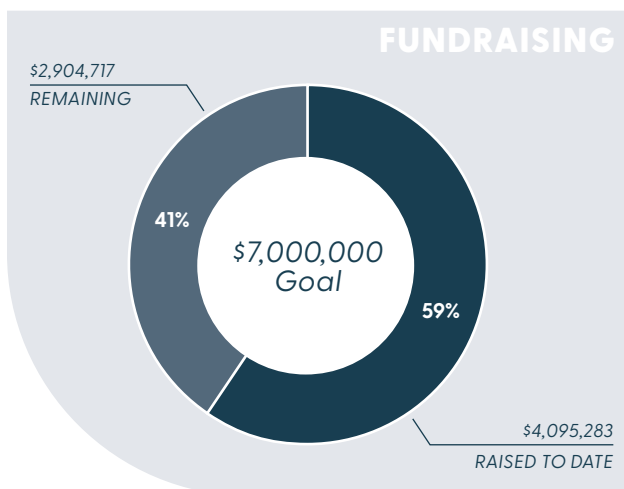


In 2021 we launched a five-year \$7 million dollar growth campaign called *Open the Gates*. This included two, million-dollar lead gifts. At the end of 2022, we raised more than \$4 million dollars toward this goal which will allow us to establish and support 300 Gospel Justice Centers across the country.

Support & Revenue	2022	2021	2020
Contributions	\$862,798	\$2,585,139	\$681,822
Grants	\$308,305	\$281,773	\$209,781
Program Fees	\$54,269	\$50,169	\$26,890
Contributed Services	\$1,395,568	\$447,923	\$571,946
Other Income, market gain/ loss, interest	(\$340,222)	\$167,843	\$7,225
Forgiveness of Paycheck Protection Program	\$0	\$125,209	\$99,300
Total	\$2,280,718	\$3,658,056	\$1,596,964

Functional Expenses	2022	2021	2020
Program Services	\$2,547,761	\$1,495,687	\$1,365,228
Management & General	\$75,318	\$114,394	\$57,888
Fundraising	\$30,802	\$26,657	\$22,829
Total Functional Expenses	\$2,653,881	\$1,636,738	\$1,445,945
Change in Net Assets	(\$373,163)	\$2,021,318	\$151,019
Net Assets – Beginning of Year	\$2,777,799	\$756,481	\$587,623
Net Assets – End of Year	\$2,404,636	\$2,777,799	\$756,481

Open the Gates Campaign Update



In Their Words



*“I came for a friend, the best thing I heard from her after her talk with the attorney is, **‘I’m not afraid anymore.’**”*

Raquel

*“This was my **very first time I felt I was a valued person.** Being heard was a rare recognition according to my past experiences. The prayer at the end of the consultation helped me breathe and feel hopeful that genuine people help good hearted people.”*

Amy, Client



*“**There is HOPE.** Administer Justice is an excellent and viable avenue to achieve understanding, direction, and assistance in your legal situation. All this with the love of God.”*

John, Client



Looking Forward



Client Focus

We have a special emphasis to expand access to gospel justice through a community outreach toolkit for centers and enhanced digital marketing.



Church Focus

With new strategic partners we intend to grow the number of new churches in 2023 as we see over 100 Gospel Justice Centers toward our goal of 300 by the end of 2025.



Persevering Power

We will celebrate the publication of Bruce's book, *Persevering Power*, by InterVarsity Press the first week of October. We will hold a gala in the fall of 2023 to celebrate the book and growth in clients, centers, and state and national partnerships.



New Partnerships

In 2023 we enter a new partnership with Prison Fellowship to expand in five cities and are finalizing other strategic partnerships with a focus in new markets including south Florida, Indiana, and Portland, OR.



Attorney Focus

With new attorney support staff, a new web page for attorneys, and new engagement vehicles we intend to grow our serving attorneys.



Restore Conference

The pandemic paused our national Restore Conference. This important gathering will return the last Saturday of July (the 29th), as we seek to celebrate and restore our volunteers in the work of justice.

Small Groups
are how we care
for one another

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President, Board Chair
Retired, Director of Ministry Dev., Alpha U.S.
Naperville, IL

Steve Keist, J.D.

Immediate Past Board Chair
Sr. Partner, KTO Law Firm
Glendale, AZ

Bruce Strom, J.D.

Founder & CEO, Administer Justice,
Author, Gospel Justice
Elgin, IL

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Itzel Alamos

National Support Center Manager

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Nelly Arellano

Launch and Support Specialist

Chris Rodriguez

Support Specialist

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Data Coordinator

Tina Swafford

Executive Administrative Assistant

Bob Thurow

Chaplain

ABOUT / SOBRE

SERVICES / SERVICIOS

Arizona Justice For
Our Neighbors
(AZJFON)

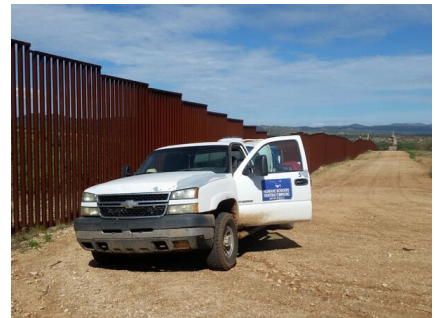
EVENTS / EVENTOS

NEWS / NOTICIAS

JOIN / UNIRSE

CONTACT / CONTACTO

DONATE / DONAR



Arizona JFON History **La historia de Arizona JFaON**

A National Network

The National Justice for Our Neighbors (JFON) network grew out of the United Methodist Committee on Relief's (UMCOR) long commitment to refugees and immigrants. The network consisting of 18 sites provides free or low-cost immigration legal services. JFON attorneys meet with clients at legal clinics in churches and community centers.

Una red nacional

La Red Nacional de Justicia para Nuestros Vecinos (JFON)

SUPPORT US

Compromiso del

Immigration Task Force did initial research but at the time the minimum budget seemed astronomical. The early dreams were not able to get off the ground.

Soñando con un JFON en Arizona

Los primeros sueños de Justicia Para Nuestros Vecinos en Arizona de comenzaron en 2012 y 2013. El Grupo de trabajo de inmigración hizo una investigación inicial, pero en ese momento el presupuesto mínimo parecía astronómico. Los primeros sueños no pudieron despegar.

Dream to Reality

In November 2015, a weekend retreat gave new energy to the JFON planning. Members of the Immigration Task Force prepared a strategic plan for an Arizona JFON. Ella Rawls, JFON's future attorney, joined the group. United Methodist Bishop Bob Hoshibata gave his support. In December 2016 the Immigration Task Force formed the Future Arizona JFON Board of Directors. This board spent 2017 putting everything in place.

De Sueño a la realidad

En Noviembre de 2015, en un retiro de fin de semana dio nueva energía a la planificación de Arizona JFON. Miembros de un grupo de trabajo de Inmigración prepararon un plan estratégico para crear un JFON en Arizona. Ella Rawls, la futura abogada de JFON, se unió al grupo. El Obispo Metodista, Bob Hoshibata dio su apoyo para la nueva organización. En Diciembre de 2016, el grupo de trabajo formó la mesa directiva del futuro Arizona JFON. Durante el 2017, la mesa directiva preparó todo para lanzar la nueva organización.

Clinics Begin

Sin embargo, cualquier persona con una pregunta legal de inmigración puede hacer una cita clínica.

Walk with us. **Caminamos juntos.**

Email *

☐

I agree to receiving marketing and promotional materials *

SUBMIT / ENVIAR



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SUPPORT US

A CALL TO GOSPEL JUSTICE

LAUNCHING A GOSPEL JUSTICE CENTER IN YOUR CHURCH

Seeking justice for the vulnerable is a call to God's people throughout scripture but it's hard to know where to start. Food pantries and homeless shelters are meeting needs, but they don't address what is causing the need.

Lack of legal advice is frequently at the root of poverty. Low-income Americans receive little or no legal help for 92% of their legal issues.

Without legal advice, simple problems become big problems and the result can be devastating.

To access justice, these vulnerable neighbors need the simple help of a lawyer to answer their questions and chart a path forward. With legal help from a caring team of volunteers at your church they will:

- > Find freedom from legal burdens.
- > Experience God's love for them through his people.
- > Gain a new appreciation for the church.

Sadly, less than 0.1% of churches are providing legal help.

Administer Justice exists to equip churches like yours with our simple model of legal ministry so lives are transformed and communities impacted.

What is a Gospel Justice Center?

A Gospel Justice Center is a ministry providing legal advice and gospel hope to clients once a month through a team of volunteers at a church. Most centers operate for 4 hours on a Saturday morning.

Hosting a Gospel Justice Center allows your church to invite vulnerable neighbors into your church every month to find legal help and gospel hope.

Join the growing number of churches nationwide who are answering the call to gospel justice.

GOSPEL JUSTICE CENTER LAUNCH TIMELINE

In as little as two months, your church can be serving clients with legal needs and sharing the hope of God's love.

Explore Gospel Justice

Learn more about our model to discern if it's a right fit for your church.

Connect with our Team

Schedule a conversation with a team member to get answers to your questions and next steps.

Commit to Launching

Identify your Justice Champion and invite them to sign the Articles of Association to get started.

Onboarding & Training

Orientation begins for your Justice Champion and volunteer team to serve in the center.

Launch the Center

Begin caring for clients as you receive ongoing support from our National Support Center.

START SERVING YOUR NEIGHBORS IN NEED WITH 3 SIMPLE STEPS:



1.
*Schedule a conversation
with our team.*



2.
*Identify a Justice
Champion*



3.
*Launch a Gospel
Justice Center*



FREQUENTLY ASKED QUESTIONS

Does church leadership have to recruit volunteers?

No. Church leadership will identify the team leader (Justice Champion). Once the Justice Champion is identified, the National Support Center equips them to recruit a team of volunteers through online training and personal orientation. A volunteer team can be as small as 4 volunteers or much larger. Regular pastoral promotion of the center within the congregation and community will help increase volunteers and clients.

Does church leadership have to recruit volunteer attorneys?

Yes and no. The Justice Champion will recruit volunteer attorneys. But, if you have attorneys in the church, this is an ideal service opportunity for them, and we encourage connecting them with your Justice Champion. If you do not have attorneys in the church, AJ can help your Justice Champion connect with attorneys in your state. We do not have a pool of existing volunteer attorneys to serve at centers – they will need to be recruited by the Justice Champion and AJ together.

Will the volunteer attorneys take cases to court?

No. Lawyers provide limited advice and counsel by providing the information needed for a client to take the next steps in resolving a legal issue. Attorneys will coach the client and offer referrals, but not provide representation.

Is our church taking on liability?

No. Volunteers are trained by and operate under AJ. As our agents they are covered by our malpractice insurance, volunteer liability insurance, and premises liability insurance (covering church premises). We provide a secure online database so sensitive client information is not stored or handled by the church.

Why do clients pay \$30 to visit the center?

The \$30 copay invites clients to be part of the process. This is a great opportunity for clients to receive trusted guidance for a small amount of money—and they won't have to pay again if they return for additional help on the issue. All copays (including scholarships awarded to clients unable to pay) are paid to AJ for the ongoing cost of insurance, database, and other support systems. These copays are the only ongoing fees between the center and AJ.

How much does it cost to launch a center?

It costs \$5000 to launch a center but the church is not expected to provide this fee—AJ asks donors to cover the launch fee. We invite churches who can provide this one-time start-up fee to do so; it allows AJ to direct fundraising toward under-resourced churches and communities. Church donations to AJ can be made at any time.

What space and equipment is needed?

Space: The church needs an open space to serve as a reception area with a table for check-in and a table for refreshments. Two additional spaces/rooms are needed for the Attorney and the Client Advocate, and a small storage space (for supplies and the retractable banner) is helpful.

Equipment: The secure client database is cloud-based and requires internet access; volunteers are encouraged to use a personal laptop to access it. A printer is useful but not required.

Does the church need to budget for any ongoing costs?

Apart from scholarship money for clients unable to cover the \$30 copay, the church is only responsible for paper and supplies once the original launch kit resources are depleted.





Christian Legal Aid of Los Angeles

333 W. Florence Ave ♦ Inglewood, CA, 90301

(323) 319-3559 ♦ <http://www.cla-la.org>

Pursuing justice, bringing hope, changing lives.

At Christian Legal Aid of Los Angeles (CLA-LA), we understand that pursuing “justice for all” is an essential aspect of loving our neighbors. We believe that providing access to basic legal services is a powerful way to offer a hand-up to the most vulnerable in society: veterans, the elderly, homeless families, victims of domestic violence, and refugees. At CLA-LA, our mission is to share the love of Jesus Christ by cultivating a passion for justice in our community and providing free legal services and hope to those in need in Los Angeles County.

What We Do

CLA-LA has been conducting free legal phone clinics once a month since April 2020 (during the pandemic). Our volunteer attorneys speak with clients about their legal issues and try to assist them as much as possible. For 14 years before the pandemic, we conducted in-person pro-bono clinics. All of the legal services are geared to educate clients about their rights and remedies and train them to negotiate and handle their own legal disputes. **We assist clients in the legal areas of expungement of criminal convictions, family law, immigration, landlord/tenant and tenant/tenant issues, bankruptcy, probate, employment, small claims, and small business.**

Who We Serve

CLA-LA has one qualifier for determining whether to serve a client – income. All clients must be at or below the definition of “very low income” as set forth in the Housing Community Development Guidelines for housing in Los Angeles. When possible, CLA-LA refers individuals who do not fit within these guidelines to outside attorneys who provide services at a reasonable rate.

Very Low Income Households (HCD Guidelines for 2023):

1-person household: \$44,150 2-person household: \$50,450 3-person household: \$56,750
4-person household: \$63,050 5-person household: \$68,100 6-person household: \$73,150

Upcoming Free Legal Aid Phone Clinics

Saturday, October 21, 2023 (Phone Clinic)-1:00pm-4:00pm

***Last day of registration is Wednesday, October 11, 2023 at 12:00pm**

Saturday, November 18, 2023 (?) -1:00pm-4:00pm

***Last day of registration is Wednesday, November 8, 2023 at 12:00pm**

Saturday, December 16, 2023 (TBD)-1:00pm-4:00pm

***Last day of registration is Wednesday, December 6, 2023 at 12:00pm**

PLEASE CALL THE OFFICE AT 323-319-3559 to do an intake over the phone or visit our website at www.cla-la.org for more information.



What We Do

At Christian Legal Aid of Los Angeles, our mission is to share the love of Jesus Christ by cultivating a passion for justice in our community and providing free legal services and hope to those in need in Los Angeles County.

We hold free legal clinics at various churches and nonprofits across Los Angeles staffed by volunteer attorneys, law students, paralegals, and individuals of diverse backgrounds with a passion for justice.

CLA-LA partners with legal aid nonprofits, faith-based charities, and local churches to provide the following services:

Attorney Consultations – CLA-LA staff and volunteers provide clients 60-90 minutes of free individualized legal advice at our clinics and partner office hours. Clients are educated as to their rights and trained on how to file court documents, prepare documents and pleadings, and negotiate to protect their own rights.

Referrals – CLA-LA will generally refer clients to other attorneys and legal aid organizations when clients need ongoing representation.

Mediation services – CLA-LA will refer clients who should consider mediation to Christian and/or free mediation services, including those offered by our local law schools.

Workshops – CLA-LA offers workshops to give clients an overview of their general legal rights. These seminars are not specific to one client's legal issues, but rather designed to give an overview of a particular area of law. Past workshop topics have included immigration, post-conviction relief, employment law, estate planning, and more.



CLA-LA is a nonprofit 501(c)(3) corporation, and we assist clients regardless of their religion, race, color, creed, national origin, ancestry, disability, gender, sexual orientation or age. CLA-LA does not provide ongoing assistance. For more information about our client services, please visit [Our Clients](#) or email info@cla-la.org.

[Donate Now](#)
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Food Pantry Volunteers

UPCOMING DATES

Oct 15, 2023
10-10:30am

Oct 17, 2023
10am-1pm

Oct 19, 2023
10am-1pm

[Show all](#)

PAST DATES

Oct 12, 2023
10am-1pm

Registration is open
Already registered? [Log in](#)

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LOCATION

Brookings Nazarene
1600 Chetco Ave
Brookings, Oregon 97415

[Show map](#)[Get directions](#)

SELECTIONS

October 3, 2023; 10am-1pm

Full

October 5, 2023; 10am-1pm

Full

October 10, 2023; 10am-1pm

Full

October 12, 2023; 10am-1pm

Full

October 17, 2023; 10am-1pm

Full

October 19, 2023; 10am-1pm

1 remaining

October 24, 2023; 10am-1pm

Full

October 26, 2023; 10am-1pm

Full

October 31, 2023; 10am-1pm

1 remaining

October 15, 2023; 10:00-10:30 am

2 remaining

Details

ALSO needed: Sunday, Oct. 15: Assist those who drop off donations at the start of the service. 10:00-10:30 only.

October Volunteer Shifts!

Please sign up for a volunteer shift from 10am to 1pm on the date that fits your schedule

Registration is open

Already registered? [Log in](#)

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Brookings Church of the Nazarene
office@brookingsnaz.org
541-469-2571

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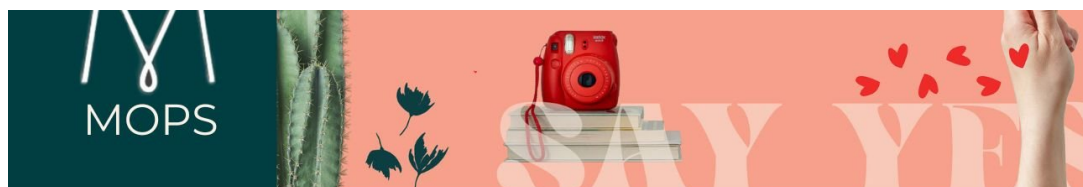
[Register](#)



MOPS

MOPS at Brookings Nazarene is a place of belonging.

The Mothers of Pre-Schoolers Ministry meets on the 1st and 3rd Mondays from September thru May. Please reach out to one of our **MOPS leaders for more information or connect with us on **Facebook**.**



Hey Mom!

Don't live that #momlife alone

MOPS is Mothers of Preschoolers but our doors are open to all moms - whether you are pregnant, have school aged kids, and everything in between. We're a place for **friendship, authentic community, support, and growth** - because...

We are Better Together!

When & Where?

**Brookings
Church of the Nazarene**

1600 Chetco Ave
1st & 3rd Mondays
September - June
10:00 - 11:45 am

Food & Coffee
Childcare
Practical Teaching
Small Groups
Speakers
Crafts



Resources:

LEARN MORE ABOUT MOPS

Weekend Service Times



Location

Street Address:
1600 Chetco Avenue
Brookings, OR 97415

Mailing Address:
PO Box 6519
Brookings, OR 97415



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541-469-2571





We are united to meet the needs in our local community with the compassion of a loving God. Our vision is to help others feel that they **BELONG** by bringing them into our open doors to meet a physical, spiritual, relational, or emotional need. Through this step, we want to lead them to **BELIEVE** in the one true God and **BECOME** mature Christ-followers who will share their stories with others.

The Community Care ministry is made up of a three-pronged approach:

- **Food:** BNaz and Brookings-Harbor Food Project
- **Finance:** Community Care Fund (including the Love Fund)
- **Family:** Other long-term partnerships with families from a guidance/counseling basis - (spiritual, financial, relational, and emotional needs)

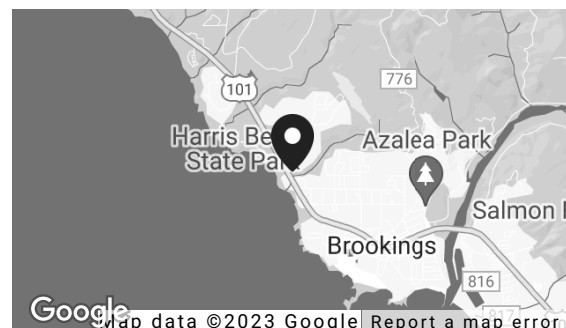




**Join us in-person or online
Sundays at 10:30 a.m.**

Street Address:
1600 Chetco Avenue
Brookings, OR 97415

Mailing Address:
PO Box 6519
Brookings, OR 97415



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It's Game Day!

October 28th 4:00pm-6:00pm

BNaz Students will host a community Gaming Day on October 28th. Join a BeGroup in the month of October to begin practicing as a team or step into a team on the day of the event.

Tournament | Pizza | Friends

brookingsnaz.org



BeYouth Video Game Tournament

CATEGORIES

Brookings Naz Youth

UPCOMING DATES

Oct 28, 2023
4-6pm

LOCATION

Brookings Nazarene
1600 Chetco Ave
Brookings, Oregon 97415

[Show map](#)

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Registration is open
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Novice (Just for Fun!)

Details

BeYouth Ministries will host a Mario Kart Video Gaming Tournament for students in grades 6-12. Students in BeGroups will form teams in the month of October in preparation for the October Gaming Day. Join a BeGroup to practice with your team in advance or step into a team on the day of the event. Enter the competitive or the novice tournament - both categories will offer prizes for the winning team. Invite your friends!

Registration Deadline: October 26th.

Gaming Tournament | Pizza | Friends

Brookings Church of the Nazarene
office@brookingsnaz.org
541-469-2571

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OF THE UNITED METHODIST CHURCH
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- **Ministries**

Abundant Health Ministries

Camps & Retreat Ministries

Circle of Indigenous Ministries

Faith Foundation Northwest

United Methodist Volunteers in Mission

United Women in Faith

Abundant Health Ministries

Ashland

Abundant Health Churches

Ashland

Address

175 N Main St, Ashland, OR 97520

Church Email

offmgr@ashlandmethodist.org

Church Phone

541.482.3647

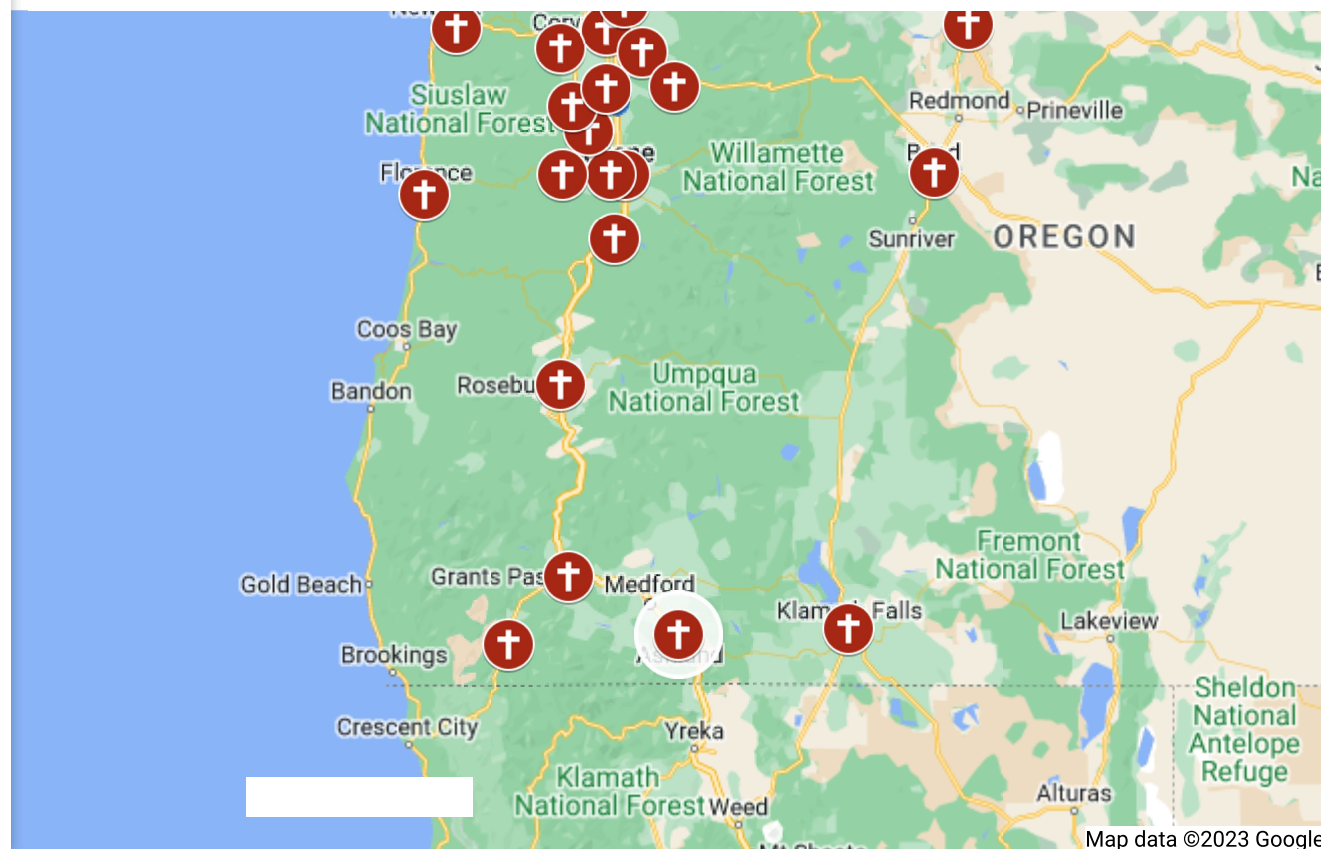
Contact

Rev Brett Strobel

Ministries Provided

Community Meals, Partner with mobile health and dental care org visiting nurses, shower, laundry trailer, clothing and food to take home

ate your own.



What is Abundant Health all about?

As United Methodists, we are committed to creating opportunities for mental, physical, and spiritual health for everyone. Our global connection is called to extend healing to all people, and we strive to bring this into reality through the Abundant Health initiative.

Explore the lifesaving possibilities for health ministry, outreach and community that will enrich your life, as well as the lives of all the people in your neighborhood and around the world.

Help fight COVID-19 globally! Love Beyond Borders

The Oregon-Idaho Conference Abundant Health team is grateful to be partners with UNICEF in "Love Beyond Borders: An Interfaith Movement to End the Pandemic." Through the United Methodist Committee on Relief (UMCOR) Advance no. 3022671, we are helping to provide vaccine equity

across the globe! Every dollar given through the Advance goes to UNICEF and its COVAX partners to help distribute COVID-19 vaccines so that every one of God's children has the chance to survive this awful pandemic.

[Learn more & donate here!](#)

Watch videos from Abundant Health trainings!

Abundant Health Ministries holds monthly virtual trainings on a variety of topics. To find the video you might want to watch, look at the menu on the top left corner of the video screen. Within that menu in the bottom right corner is a set of left and right arrows that allows you to toggle through to the video resources we've collected.



Abundant Health Videos

from Greater Northwest Episcopal
Area

1 of 8 Abundant Health - Le...

1:06:30

Resources

Body

- [Abundant Health game w/ Wesley](#)
- [Immunization Action Coalition](#)

- [Tips for Men's Health](#)
- [Tips for Women's Health](#)
- [Tobacco faith & facts card](#)
- [YMCA- USA](#)
- [YWCA- USA](#)

Mind

- [Alcohol/Drugs faith & facts card](#)
- [Alcoholics Anonymous](#)
- [Blue Zones](#)
- [Church activities: mental health](#)
- [Debtors Anonymous](#)
- [Drug Abuse social media kit](#)
- [Drug Addicts Anonymous](#)
- [Guide to Active Listening](#)
- [Benefits of knitting/crocheting](#)
- [Hope Circle](#)
- [Hope guide: Saddleback Church](#)
- [Adult learning principles](#)
- [Leading causes of life](#)
- [Little Free Library](#)
- [Mather Institute: Aging Well](#)
- [Mental illness study guide](#)
- [Narcotics Anonymous](#)
- [National Alliance of Mental Illness](#)
- [Saving Grace: Money management](#)
- [Self-management resource center](#)
- [Stress handout](#)

Spirit

- [Academy for Spiritual Formation](#)
- [Center for Action & Contemplation](#)
- [Companions in Christ: Group](#)

- [Dancing with Words - Storytelling](#)
- [Living Compass](#)
- [Messy Church USA](#)
- [Oregon-Idaho UMW](#)
- [Peace Poles](#)
- [Sojourners](#)
- [Spirit Handout](#)
- [Spiritual Growth Plan](#)
- [Health worship resources](#)

Physical Body

- [American Red Cross](#)
- [Be Active flyer](#)
- [Be Active Social Media kit](#)
- [Be Well Stanford](#)
- [Bingo Activity booklet](#)
- [Run for God](#)
- [Take Off Pounds Sensibly](#)
- [Weight Watchers](#)

Food & Nutrition

- [5 Key habits of healthy eaters](#)
- [Crop Hunger Walks](#)
- [Eat Smart Idaho](#)
- [Faith Activity and Nutrition](#)
- [FAN brochure](#)
- [Flu shot info & locator](#)
- [Food Heroes \(OSU\)](#)
- [Healthy recipe cookbook booklet](#)
- [Hidden sugars in common drinks](#)
- [How to read food labels](#)
- [Idaho Food Bank](#)
- [Nutrition Workshop Guide - UMC](#)

- [Oregon Food Bank](#)
- [Recipe for Enough: erasing hunger](#)
- [Re-think your drink](#)
- [Think before you drink](#)
- [Tips for teens: nutrition & health](#)
- [What's on nutrition facts label?](#)

Body, Mind & Spirit

- [AH Body Breaks videos](#)
- [AH Church Ribbon Logo](#)
- [AH Logo](#)
- [AH Logo - white](#)
- [Circle of Care planning booklet](#)
- [Collaboration opportunity tool](#)
- [Healthy Health ministry handout](#)
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- [National Health Months](#)
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- [Tips on starting health ministry](#)
- [Faith Community Nursing](#)
- [Health/wellness agreement](#)
- [Personal health assessment](#)
- [Self care assessment - UBSSW](#)

Global Connection

Advocacy

Recommended giving

- [UM Women - GIVE NOW](#)
- [Abundant Health Advance](#)
- [Atlantic Street Center \(PNW\)](#)
- [Brazil: “Shade & Fresh Water”](#)
- [Central WA Justice 4 Neighbors](#)
- [Imagine No Malaria](#)
- [Immigration:Justice 4 Neighbors](#)
- [Katherine T. Parker Missionary](#)
- [Kenya – Maua Hospital.](#)
- [Liberia – Camphor Clinic](#)
- [Liberia—Ganta Hospital.](#)
- [Tacoma Community House](#)
- [The Impact of Giving](#)
- [UM Committee on Relief](#)

Abundant Health Team

Ronda Cordill, WJ UMVIM Coordinator, Cheney UMC, Inland District

Vickie Johnson LCSW, Madras UMC, Cascadia District

Cheryl Juntunen, Rupert UMC, Sage District

Emilie Kroen, AH Team Leader, Lake Oswego UMC, Columbia District

Chris Mitchell, Falls City UMC, Cascadia District

Dr. Ken Orwick, Lebanon UMC, Crater Lake District

Marilyn Sanchez Reid, PNW AC Missions Secretary, Ronald UMC, SeaTac District

Karen Scranage, Spirit of the Valley UMC (Halsey), Crater Lake District

Questions?

Contact Emilie Kroen at ekroen@yahoo.com

Contacting Us

Oregon-Idaho Annual Conference Center
1505 SW 18th Avenue
Portland, Oregon, 97201-2524
503-226-7931 or 1-800-JWesley (800-593-7539)




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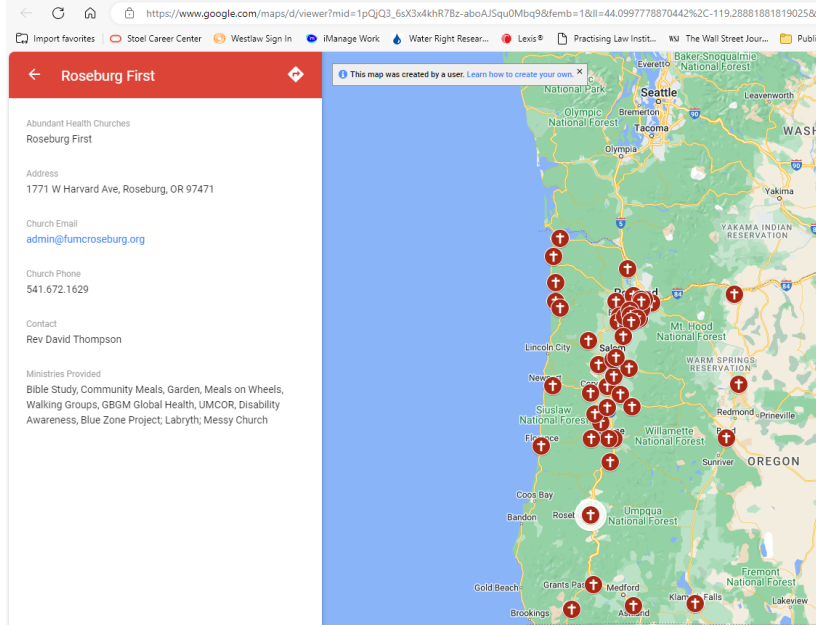
Services provided by various churches in the Oregon-Idaho Conference of the United Methodist Church

A review of the Oregon-Idaho Abundant Health Ministries in Oregon shows that several providing a variety of “social services.” All maps below were taken from: Oregon-Idaho Conference of the United Methodist Church, *Abundant Health Ministries*, <https://www.umi.org/abundanthealth> (last visited Oct. 18, 2023) (Appendix CC)

Summary:

- First United Methodist Church in Roseburg, for example, has Community Meals.
- Newman United Methodist Church in Grants Pass hosts and supports FISH food pantry; Homeless local group; Voice of Hope: team deals with issues of housing shortage, homelessness and poverty in community; Overnight shelter on cold nights; "Bridge the Gap" school clothes and supplies and washer and dryers.
- Immanuel in Cave Junction has Food Pantry.
- Ashland Methodist Church has Community Meals, Partner with mobile health and dental care org visiting nurses, shower, laundry trailer, clothing and food to take home.
- Trinity Methodist in Toledo (near Newport) has Food Pantry/, Tai Chi/ Yoga, Balance classes,
- Tillamook UMC has a Food Pantry, Community Meals
- Bay City UMC has a Food Pantry, Community Meals

First United Methodist Church in Roseberg:



Newman United Methodist Church in Grants Pass:

← Newman - Grants Pass

Abundant Health Churches

Newman - Grants Pass

Address

132 NE B St, Grants Pass, OR 97526

Church Email

channumc@aol.com

Church Phone

541.479.5369

Contact

Rev Ryan Scott

Ministries Provided

Children's church; UMCOR kits; Men's Breakfast & Bible Study; Grief Group; Ecumenical worship for MLK Jr. Day through the MLK Jr Center for Non-Violence; "Living the Question" study; UMW; WEekly Bible Study; Promotes INM; Intentional progressive theoplogy topical class led by pastor; walking group; hosts and supports FISH food pantry; UMCOR support; Blanket Sunday (through Church World Service; Heifer Project; Homeless local group; single parent support ministry; "Voice of Hope: team deals with issues of housing shortage, homelessness and poverty in community; Overnight shelter on cold nights; "Bridge the Gap" school clothes and supplies and washer and dryers.

This map was created by a user. [Learn how to create your own.](#)

Immanuel in Cave Junction:

← Immanuel - Cave Junction

Abundant Health Churches

Immanuel - Cave Junction

Address

200 W Watkins St, Cave Junction, OR 97523

Church Email

rev_chase@peoplepc.com

Church Phone

541.592.3876

Contact

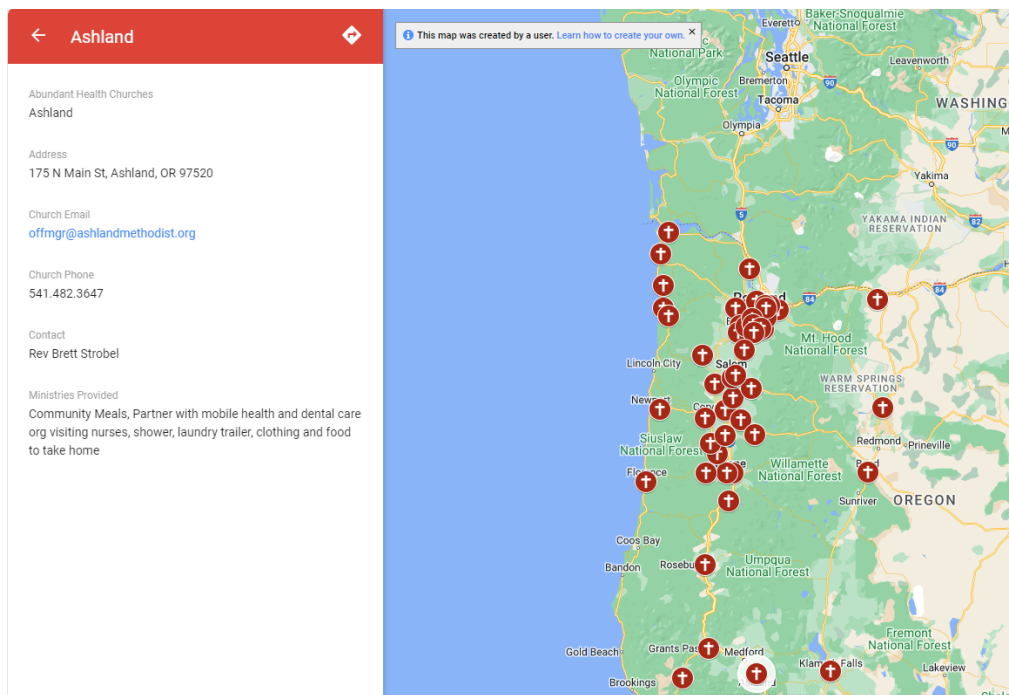
Jo Spencer

Ministries Provided

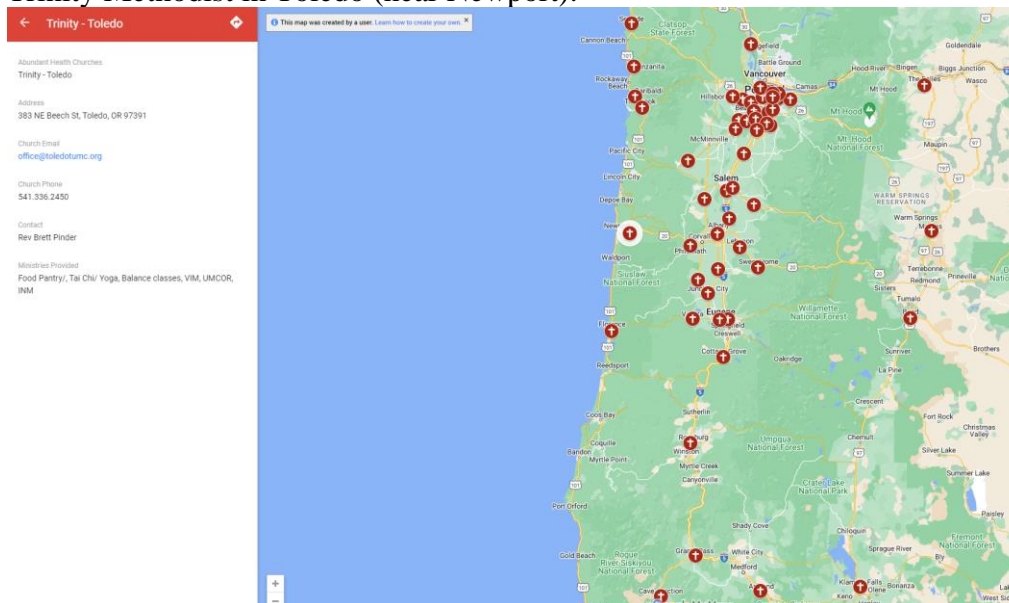
Food Pantry

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Ashland Methodist Church:



Trinity Methodist in Toledo (near Newport):



Tillamook UMC:

← Tillamook

Abundant Health Churches

Tillamook

Address

3808 12th St, Tillamook, OR 97141

Church Email

tillamookumc@gmail.com

Church Phone

503.842.2224

Contact

Betty Hickey

Ministries Provided

Food Pantry, Community Meals

This map was created by a user. Learn how to create your own.

Bay City UMC:

← Bay City

Abundant Health Churches

Bay City

Address

5695 D St, Bay City, OR 97107

Church Email

baycityumc@bcccoast.net

Church Phone

503.377.2679

Contact

Roberta Bettis

Ministries Provided

Food Pantry, Community Meals, Walking Groups

This map was created by a user. Learn how to create your own.

Churches Served at Statewide - OR

Church Name	County	Total Clinics	Total Clinics Since 2021
Albany First Christian Church	Linn	1	1
Albina Christian Life Center	Multnomah	10	0
All Saints Episcopal Church	Multnomah	370	0
Ascension Catholic Church	Multnomah	9	3
Beaverton SDA Church	Washington	1	0
Bend Church	Deschutes	6	0
Bethel Community Church	Washington	10	0
Burnside Baptist Church	Multnomah	1	1
Calvary Baptist Church	Linn	2	0
Calvary Chapel	Yamhill	2	0
Calvary Community Church	Cowlitz	2	0
Canby Christian Church	Clackamas	48	0
Canby Foursquare Church	Clackamas	3	0
Capital Park Wesleyan Church	Marion	2	0
Cedar Mill Bible Church	Washington	15	0
Christ The Good Shepherd Lutheran Church	Marion	1	0
Church of the Cascades - Bend, OR	Deschutes	1	1
Circle Church of Christ	Benton	3	0
City Center Church	Deschutes	77	0
City Harvest Church	Clark	1	0
Coast Vineyard Christian Fellowship	Lincoln	8	0
Columbia Presbyterian Church	Clark	1	0
Columbia River Foursquare Church	Columbia	1	0
Corvallis Evangelical Church	Benton	5	0
Cross Roads Christian	Benton	4	2
Crowfoot Baptist Church	Linn	3	0
Dayton Christian Church	Yamhill	1	0
East County Church Of Christ	Multnomah	15	0
East Park Church	Clark	1	0
Eastside Free Methodist Church	Multnomah	7	0
Emmanuel Full Gospel Temple	Multnomah	2	0
Evangelical Bible Church	Polk	0	1
Faith Lutheran Church	Polk	1	0
Faith Lutheran Church	Marion	4	0
Faithful Savior Lutheran Church	Multnomah	1	0
Family Worship Center	Marion	1	0
First Baptist Church	Yamhill	1	0
First Baptist Church - Corvallis	Benton	4	0
First Baptist Church - Newport	Lincoln	1	1
First Baptist Church of Forest Grove	Washington	2	0
First Baptist Church of McMinnville	Yamhill	29	1
First Baptist Church of Portland	Multnomah	5	0
First Baptist Church of Prineville	Crook	2	0
First Christian Church	Polk	1	0
First Christian Church	Linn	10	0
First Christian Church	Benton	1	0
First Christian Church Dallas	Polk	36	21
First Presbyterian Church- Oregon City	Clackamas	17	0
First United Methodist Church Corvallis	Benton	7	0
First United Methodist Church - Portland	Multnomah	45	20
Foothills Church	Marion	1	0
Forest Grove United Methodist	Washington	1	0
Forest Hills Lutheran School	Washington	17	0
Garden Way Church	Lane	1	1
Gateway Baptist Church	Multnomah	7	2
Gladstone First Baptist Church	Clackamas	1	0
Glide Seventh Day Adventist Church	Douglas	4	0

[RM2 - Residential Multi-Dwelling 2](#)

Grace Baptist Church	Marion	3	0
Grace Lutheran Church - Molalla	Clackamas	5	5
Grant Avenue Baptist Church	Benton	3	0
Grants Pass River of Life Church	Josephine	82	1
Green Community Church	Douglas	6	0
Harvest Christian Center	Benton	1	0
Helping Hands - 7th Day Adventist Church	Douglas	29	0
Highland Christian Center	Multnomah	42	30
Hillsboro Seventh Day Adventist Church	Washington	6	0
Hillsboro Spanish Seventh Day Adventist Church	Washington	1	0
Holy Cross Catholic Church	Multnomah	2	2
Holy Redeemer Catholic Church	Multnomah	3	1
Holy Trinity Catholic Church	Washington	43	14
Immanuel Lutheran Church	Clark	1	1
Jefferson Evangelical Church	Marion	6	0
Kelso Church of Christ	Cowlitz	1	1
Kingdom Nation Church	Multnomah	1	0
Kings Circle Assembly of God	Benton	1	0
Kingwood Bible Church	Polk	7	0
Korean Bethel Presbyterian Church	Washington	18	10
Lebanon Foursquare Church	Linn	2	0
Lents Seventh-day Adventist Church	Multnomah	1	0
Life Change Church	Multnomah	1	0
Living Hope City Church	Polk	30	0
Living Hope Church - Vancouver	Clark	3	3
Longview Community Church	Cowlitz	9	0
McMinnville Covenant Church	Yamhill	80	0
Milwaukie Christian Church	Clackamas	1	0
Mt. Olivet Baptist Church	Multnomah	0	1
New Beginnings Church of God	Douglas	3	2
New Hope Church	Deschutes	5	1
New Hope Missionary Baptist Church	Multnomah	2	2
New Life Christian Center	Douglas	62	0
New Life Fellowship	Benton	5	0
New Life Foursquare Church	Clackamas	1	0
Newberg Friends Church	Yamhill	1	0
Newport Nazarene Church	Lincoln	73	16 abutting a commercial zone
13730 SW Walker Rd, Beaverton, OR 97005	Clatsop	82	76
Northcrest Community Church	Clark	1	1
Northside Community Church	Yamhill	1	0
Northwest Hills Community Church	Benton	38	0
Oak Street Church	Marion	5	0
Olivet Baptist Church	Lane	7	0
One H.O.P.E. Fellowship	Multnomah	1	1
Oregon City Church of the Nazarene	Clackamas	10	0
Pacific Highway Community Church	Marion	2	0
Peace Lutheran Church	Benton	1	0
Peace Lutheran Church - Salem	Polk	126	17
Port Orford Christian Center	Curry	145	12
Portland Central Nazarene Church	Multnomah	3	2
Portland Open Bible Church	Multnomah	36	29
Portsmouth Union Church	Multnomah	1	0
Powell Butte Christian Church	Crook	1	0
Re:new Church	Benton	6	0
Redeemer Lutheran Church	Marion	32	6
Redeemer Lutheran Church	Multnomah	2	0
Redeemers Fellowship	Douglas	17	0
Rise Church (Formerly Calvin Presbyterian Church)	Washington	1	0
River Center Church	Linn	46	9

River City Church	Clark	4	4
Rolling Hills Community Church	Clackamas	272	54
Sacred Heart Catholic Church	Tillamook	4	0
Salem Alliance Church	Marion	10	0
Salem Evangelical Church	Marion	9	0
Salem First Baptist Church	Marion	18	0
Salem First Church of the Nazarene	Marion	6	0
San Martin de Porres	Yamhill	5	2
Scappoose Foursquare Church	Columbia	1	0
Seventh Day Adventist Church	Douglas	40	0
Solid Rock Community Church	Marion	28	0
Sonrise Church	Washington	34	0
Southgate Chapel	Clackamas	3	0
Southside Community Church	Benton	1	0
St Andrew Catholic Church	Multnomah	26	10
St Anne Catholic Church	Multnomah	10	0
St. Anthony Catholic Church-Tigard	Washington	174	29 Comp plan: medium density
St Anthony of Padua Catholic Church	Multnomah	4	0
St Cecilia Church	Washington	3	0
St Frederic Catholic Church	Columbia	1	1
St Henry Catholic Church	Multnomah	3	0
St. James Catholic Church	Yamhill	11	3
St John The Baptist Catholic Church	Clackamas	1	0
St. Joseph Catholic Church	Clark	4	1
St Matthew Catholic Church	Washington	3	0
St. Matthew Lutheran Church	Washington	4	0
St Michael & All Angels Episcopal Church	Multnomah	6	3
St Michael's Episcopal Church	Yamhill	35	2
St Paul Lutheran Church - Portland	Multnomah	6	6
St. Peter Catholic Church - Newberg	Yamhill	5	1
St Peter Catholic Church - Portland	Multnomah	7	2
St Pius X Catholic Church	Washington	5	0
St Timothy's Episcopal Church	Curry	36	4
Suburban Christian Church	Benton	1	0
Sunset Presbyterian Church	Washington	1	0
Tigard Christian Church	Washington	1	0
Trinity Lutheran Church	Multnomah	1	0
Trinity United Methodist Church	Marion	8	0
United Methodist Church of Hillsboro	Washington	28	0
Valley Life Center	Polk	8	0
Vancouver Church	Clark	24	5
Village Church	Washington	12	8
Willamina Free Methodist Church	Yamhill	5	2
Wood Village Baptist Church	Multnomah	3	3
Woodburn Foursquare Church	Marion	1	0
Woodburn United Methodist Church	Marion	44	19
Woodland Presbyterian Church	Cowlitz	15	0
Zion Mennonite Church	Clackamas	3	0
		2851	457

Supplemental City Council Packet
October 23, 2023
7pm – Council Chambers

Attachment/ Page #	From:	Description:
File No. APP-1-23		
# A Pg. 1-23	City	June 7, 2021 City Council Workshop Agenda Packet
#B Pg. 24-28	City	August 30, 2021 City Council Workshop Agenda Packet
#C Pg. 29-33	City	October 5, 2021 Planning Commission Agenda Packet (Item 4.2)
#D Pg. 34-41	City	October 25, 2021 City Council Agenda Packet (Item G.3.)
#E Pg. 42	Patricia Luce	Letter in support of St. Timothy's Church

City of Brookings

WORKSHOP Agenda

CITY COUNCIL

Monday June 7, 2021, 4:00pm

City Hall Chambers, 898 Elk Drive, Brookings, OR 97415

A. Call to Order

B. Roll Call

C. Topics

- 1.** St. Timothy's Episcopal Church – Change of Use [PWDS – Pg. 1]
 - a.** BMC Land Development Code sections relative to St. Timothy's change in use [Pg. 4]
 - b.** Neighborhood Petition [Pg. 6]
 - c.** Peter's Letter – October 10, 2020 [Pg. 9]
 - d.** Curry Coastal Pilot, January 9, 2020 – Linda Pinkham "St. Tim's serving up food and fellowship" [Pg. 11]
 - e.** Episcopal Diocese of Oregon, October 20, 2017 – "Congregation Close Up, St. Timothy's, Brookings" [Pg. 18]
 - f.** City of Brookings Temporary Rule 2020-1, Camping by homeless on property of religious institutions [Pg. 22]

D. Council Member Requests for Workshop Topics

E. Adjournment

All public City meetings are held in accessible locations. Auxiliary aids will be provided upon request with at least 72 hours advance notification. Please contact 469-1102 if you have any questions regarding this notice.


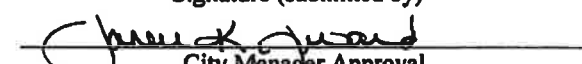
Due to the COVID-19 virus, meeting participants in the EOC Building will be limited and social distancing of six (6) feet will be required and maintained.

CITY OF BROOKINGS

COUNCIL WORKSHOP REPORT

Meeting Date: June 7, 2021

Originating Dept: PW/DS


Signature (submitted by)

City Manager Approval

Subject:

St. Timothy's Episcopal Church - Change of Use

Background/Discussion:

St. Timothy's Episcopal Church is located at 401 Fir Street in a residential zone designated as R-1 single family residences with a minimum of 6000 square foot lot size. The single family residential (R-1) district allows for single family dwellings outright. Per section 17.124.100 of the Brookings Municipal Code, churches are allowed in an R-1 district with a conditional use permit. St. Timothy's Church was developed prior to codification of the land development code thereby placing the property into a "nonconforming use" or "de facto conditional use" status.

In 1999 the Planning Commission approved a request from St. Timothy's for minor change (MC-1-99) to their nonconforming de facto conditional use permit in order to expand their building to include additional worship space. At that time, then St. Timothy's building committee member Bernie Lindley and Rev. William Smith stated in their finding of facts that there would be no significant increase in traffic to the property due to the addition. The Church at that time had 17 off street parking spaces and with the addition would have been required to provide 22 off street parking spaces. Staff prepared the final conditions of approval without the required 5 additional parking spaces stating that the addition would generate negligible traffic. The Planning Commission approved the staff proposed conditions. Since then, additional parking spaces have been added as there are approximately 26 parking spaces currently. In 2007 a building permit was pulled for the construction of a storage shed.

	<u>Parking Spaces</u>
St. Timothy's	26
Star of the Sea Catholic	156
Trinity Lutheran	92
Seventh Day Adventist	50
Presbyterian	50
Living Waters Four Square Gospel	50
First Baptist Community*	0
Calvary Assembly of God	53
Grace Bible	40

*established parking agreements with neighboring properties with off street parking

In 2009 St. Timothy's opened a health care and dental clinic operated out of the downstairs (basement) area. The facility was open from 1-4pm every Tuesday and in the four years the clinic was open served over 1750 patients. There is no record of a minor change to the conditional use permit for this activity. They are currently operating a COVID vaccination clinic.

In 2009 St. Timothy's began providing meals two days a week. In a Curry Pilot article on January 9, 2020 by Linda Pinkham – "St Tim's serving up food and fellowship" it is stated that between 60-70 show up at the church for meals, some of them are either on fixed incomes, experiencing homelessness, families or the working poor. Staff believes St. Timothy's Church is operating a commercial kitchen without a permit. Staff also believes St. Timothy's is operating in the capacity as a "Mission" would for they are providing shower facilities including the offering of clothing, hygiene kits and dignity bags every Monday, Wednesday and Friday morning as well as free hair cut's during soup kitchen hours. In addition staff is aware that individuals have listed the church as their physical address in order to establish businesses, receive mail and to facilitate eligibility for social services. There is no record of a minor change to the conditional use permit for this activity.

Since the opening of the soup kitchen at St. Timothy's in 2009 there has been a significant increase in calls for service through dispatch of the Brookings Police Department by comparison to other churches in residential neighborhoods.

	<u>2010</u>	<u>2020</u>
St. Timothy's*	8	154
Star of the Sea Catholic*	5	24
Trinity Lutheran*	4	20
Seventh Day Adventist*	2	19
Presbyterian*	5	13
Living Waters Four Square Gospel	2	7
First Baptist Community	4	7
Calvary Assembly of God	7	7
Grace Bible	0	0

*Represents churches that are currently or have offered dine in or take out meal services.

In 2020, the City of Brookings issued a permit for a maximum of three car campers in the parking lot of St. Timothy's. On several occasions during the active permit they have exceeded the amount allowed. There have been no other requests for a temporary car camping permit from other churches in the city.

A neighboring resident of St. Timothy's presented a petition at a City Council meeting in March of 2021. The petition has 29 signatures from concerned neighbors. He expressed concern regarding the subject property as he shared his negative experience with the visitors that frequent the church regularly for services he believes are offered outside the churches conditional use permit.

Staff is seeking input from Council on potential future steps to address neighborhood concerns regarding St. Timothy's change in use and need for a minor change to the de facto conditional use permit (CUP). These steps may include:

1. Send an official letter to Public Health Department inquiring about the operation of an unpermitted commercial kitchen that serves up to 70 meals while open.
2. Require St. Timothy's to apply for a Minor Change to their existing conditional use permit (MC-1-99) in order to condition the increased use of the property, not otherwise anticipated with a church, located in a residential neighborhood.
3. Revisit and potentially rescind temporary rule 2020-1 allowing temporary car camping authorized by the City in March 2020.

Attachments:

1. BMC Land Development Code sections relative to St. Timothy's change in use
2. Neighborhood petition
3. Peters Letter - October 10, 2020
4. Curry Coastal Pilot, January 9, 2020 - Linda Pinkham "St. Tim's serving up food and fellowship"
5. Episcopal Diocese of Oregon, October 20, 2017 - "Congregation Close Up, St. Timothy's, Brookings"
6. City of Brookings Temporary Rule 2020-1, Camping by homeless on property of religious institutions

17.116.090 Minor change.

The applicant may apply to the planning commission for a minor change to the site plan and/or conditions of approval of an approved planned community. The planning commission will hold a public hearing to consider the nature of the requested change, impacts the change may have on surrounding properties and/or on the remaining portion of the project, and the impact on the city's services and facilities. The commission may approve or deny the minor change. If the change is approved it may be incorporated into the project. If it is denied the project remains as originally approved and the change cannot be incorporated. Applications for a minor change must be submitted with the following:

A. A filing fee in an amount established by general resolution of the city council. No part of the fee is refundable.

B. A site plan or revised subdivision map showing the proposed changes and how they compare to the originally approved project. If the change does not include the physical site plan of the project, a text explaining the desired change must be submitted.

C. A statement explaining how the proposed change relates to the approved project and any impacts it may have on the project and/or adjoining property holders and city services and facilities. [Ord. 09-O-636 § 2; Ord. 92-O-446.J § 3; Ord. 89-O-446 § 1. Formerly 17.116.110.]

17.120.010 Continuation of a nonconforming use.

A lawfully preexisting use of a structure or site, which does not conform to the regulations for the district in which it is located, shall be deemed to be a lawful, nonconforming use and may be continued, subject to the following regulations:

A. Routine maintenance and repairs may be performed on structures or sites.

B. No nonconforming structure shall be moved, altered, or enlarged unless required by law, allowed elsewhere in this code, or unless the moving, alteration or enlargement will result in the elimination of the nonconforming use.

C. No structure partially occupied by a nonconforming use shall be moved, altered or enlarged in such a way as to permit the enlargement of the space occupied by the nonconforming use. [Ord. 09-O-637 § 2; Ord. 89-O-446 § 1.]

17.124.100 Churches, hospitals, other religious or charitable institutions.

In any "R" district, all such uses shall be located on a street adequate to serve the use. All off-street parking facilities shall be adequately screened from abutting property to reduce noise and other negative impacts. [Ord. 09-O-640 § 2; Ord. 08-O-616 § 2; Ord. 89-O-446 § 1.]

17.136.110 Violation of conditions.

It shall be unlawful for any person to violate any condition imposed by a conditional use permit. The planning commission may revoke any conditional use permit for noncompliance with conditions set forth in the granting of said permit after first holding a public hearing and giving notice of such hearing as provided in Chapter 17.84 BMC. The foregoing shall not be the exclusive remedy for a violation of conditions of approval. [Ord. 09-O-641 § 2; Ord. 96-O-446.BB § 6; Ord. 89-O-446 § 1.]

17.136.150 Use permit to run with the land.

A conditional use permit granted pursuant to the provisions of this chapter shall run with the land and shall continue to be valid upon a change of ownership of the site or structure which was the subject of the use permit application, unless revoked by the planning commission for violation of the conditions of approval. [Ord. 09-O-641 § 2; Ord. 92-O-446.J § 4; Ord. 89-O-446 § 1. Formerly 17.136.160.]







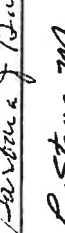



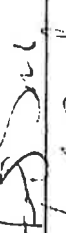
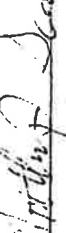
Petition to Remove Homeless from St. Timothy Church

Petition summary and background	This Petition will be submitted to the City of Brookings with the purpose to reconsider allowing vagrants to continue to live and congregate at St. Timothy's Church with no supervision for matters concerning public safety and the personal expenses of the homeowners living next to the church. In the past six months alone, vagrants have caused significant problems in the community including but not limited to, criminal trespassing, theft, harassment, possession of drugs, littering (trash and drug paraphernalia), disorderly conduct, physical altercation, and even child neglect. These types of hostile individuals should not be allowed to camp in a community for concerns of safety and the wellbeing of other citizens.		
Action petitioned for	We, the undersigned, are concerned citizens who urge our leaders to act now to remove the homeless encampment and prevent the congregation of vagrants or undesirables at St. Timothy Church.		

Printed Name	Signature	Address	Comment	Date
Brandon Usry		412 Fir St. Brookings, Oregon	I have written a more detailed paper in regards to this issue.	4/9/2021
Doreen Golding	Doreen Golding	412 Fir St. Brookings, OR		4/10/21
Justin Barnes	Justin Barnes	615 Old County Rd		4/10/21
Karen Holmes	Karen Holmes	615 Old County Rd		4/10/21
Roger L. Thompson	Roger L. Thompson	617 Old County Rd		4/10/21
Janet Walsh	Janet Walsh	617 Old County Rd		4/16/21
Gene Van Zelf	Gene Van Zelf	406 Azalea Park Rd		4.10.21
Andrea Christensen	Andrea Christensen	407 Azalea Park Rd		4/10/21
Matthew Rivera	Matthew Rivera	410 Azalea Park Rd		4/10/21
SPSON MARRIS	SPSON MARRIS	410 Azalea Park Rd		4/10/21
ANGEL NAVAARO	ANGEL NAVAARO	412 Azalea Park Rd		4/10/21
Debra Anderson	Debra Anderson	412 Azalea Park Rd		



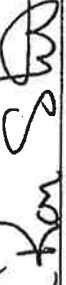



Petition to Remove Homeless from St. Timothy Church

Petition summary and background	This Petition will be submitted to the City of Brookings with the purpose to reconsider allowing vagrants to continue to live and congregate at St. Timothy's Church with no supervision for matters concerning public safety and the personal expenses of the homeowners living next to the church. In the past six months alone, vagrants have caused significant problems in the community including but not limited to, criminal trespassing, theft, harassment, possession of drugs, littering (trash and drug paraphernalia), disorderly conduct, physical altercation, and even child neglect. These types of hostile individuals should not be allowed to camp in a community for concerns of safety and the wellbeing of other citizens.
Action petitioned for	We, the undersigned, are concerned citizens who urge our leaders to act now to remove the homeless encampment and prevent the congregation of vagrants or undesirables at St. Timothy Church.

Printed Name	Signature	Address	Comment	Date
Paul Rice		425 Azalea Park Rd		4/10/21
Gabbie Settlemyre		428 Azalea Park Rd		4/10/21
Becky Winter		512 Pacific Ave. # 3		4/10/21
Maria Shepherd		508 Fir St		4/10/21
Braden Braillette		509 Fir Street		4/10/21
Barbara Baker		433 Fir St		4/10/21
Larry S. Morris		434 Fir		4/10/21
Malinda R. Morris		434 FIR		4/10/21
Michelle Seale		438 Fir St.		4/10/21
Anthony Seale		438 fir st		4/10/21
Anthony Seale		438 fir st		4/10/21
Robin Stark		424 Fir St		4/10/21

Petition to Remove Homeless from St. Timothy Church

Petition summary and background	<p>This Petition will be submitted to the City of Brookings with the purpose to reconsider allowing vagrants to continue to live and congregate at St. Timothy's Church with no supervision for matters concerning public safety and the personal expenses of the homeowners living next to the church. In the past six months alone, vagrants have caused significant problems in the community including but not limited to, criminal trespassing, theft, harassment, possession of drugs, littering (trash and drug paraphernalia), disorderly conduct, physical altercation, and even child neglect. These types of hostile individuals should not be allowed to camp in a community for concerns of safety and the wellbeing of other citizens.</p>
Action petitioned for	<p>We, the undersigned, are concerned citizens who urge our leaders to act now to remove the homeless encampment and prevent the congregation of vagrants or undesirables at St. Timothy Church.</p>

Printed Name	Signature	Address	Comment	Date
Angela Edwards		521 Fir St		4-10-2021
Michelle Greene		423 Fir St.		4/10/21
Ron Streela		421 Fir St		4/10/21
Todd Pearson		420 Fir St		4/10/21
Kathleen Pearson		420 Fir St		4/10/21
CLAYTON WELLS		407 Fir Street		04/14/21

October 10, 2020

Dear City of Brookings,

I am writing this letter with Praise and Fear. I have lived in Brookings for the past 31 years and in the past 2 years I have seen many changes. I am speaking of *our* Azalea Park and the surrounding neighborhood. I believe there has been many positive changes to the park. I love that it has been made user friendly to the community. The Basketball Courts, Soccer/Flag Football Field, Softball Fields with play area, trails, Frisbee Golf and new Restrooms. I also love the clearing of some tress and the underbrush to see out in the distance as you walk. This is just to name a few. But I feel like we as a community are losing *our* Park.

My Fear is for our children and young adults. I have been to the park many times with my grandchildren and we have to watch where we walk because there are people coming out of the bushes, sleeping in sleeping bags and walking up to us to see if we have coins or food. My daughter who is a senior has played summer soccer, basketball and Softball at the park and we had to have her park under lights because of the people in the dark approaching her. We have even had a transient strike a whip towards our direction as we were walking through.

I feel that the majority of the issue is from St. Timothy's Church on the corner of Old County and Fir St. They hand out food all day and let transients hang out there and stroll over to the park to hang out. The transients that have motor homes or vehicles park at the church or across the street at Azalea Park and stay there. For example the city is in the process of working on the parking lot across from St Timothy's, so now we have many motorhomes parking at Kid Town with our kids there. Transients had made a camp down from the church in the bushes and the city cleaned that out. St Timothy's makes it easy for Transients to stick around the neighborhood.

On April 6, 2020 City Councilors passed a temporary emergency rule about homeless camping on religious institutions during a pandemic. I understand that, but I feel that the St Timothy's church is acting as a Soup Kitchen 6 days a week and a religious institution on Sunday. The definition of a religious institution is "Churches, temples, mosques and other places of worship and *institutions* that exist to support and manage the practice of a specific set of *religious* beliefs." The definition of a Soup Kitchen is "a place where free food is served to those who are homeless or destitute". Don't get me wrong I am sure there is some good that comes from St Timothy's but I also feel that it is a free for all most the time. I go by other religious institutions in town and if they are serving food you never see all the mischievous actions or loitering.

I know that transients have become an issue and I am not a professional on how to fix the problem, but I do know that we need to save our kids and community. We should not feel threatened, scared or fearful in our own parks, beaches and streets.

I thank you for your time reading my concerns and complaint. I truly do appreciate all the time and efforts that our city puts into making Brookings that best it can be.

Thank You,

A handwritten signature in black ink, appearing to read 'Tina Peters', written in a cursive style.

Tina Peters

541-254-0463

https://www.currypilot.com/news_paid/photos-st-tim-s-serving-up-food-and-fellowship/article_ed4243ea-3319-11ea-bd04-1726685ef366.html

FEATURED

Photos / St. Tim's serving up food and fellowship

Linda Pinkham pilotnews@countrymedia.net

Jan 9, 2020



Angele Holm salts the gravy.

Linda Pinkham / The Pilot

Every Tuesday, lunch is served at St. Timothy's Episcopal Church in Brookings ... to anyone who wants to eat, whether homeless, hungry or just lonesome.

On this chilly day, when the doors are opened early so guests can come in to warm up, between 60 and 70 people show up at the church, at 401 Fir St.

Many of them are regulars, although several new people come each month. Some of them are on fixed incomes and eat there to stretch their pensions. Many are homeless, some are families, others the "working poor."

Lunch is served at noon, but already this morning the pans are clattering and large pots are boiling on the stove. The menu will be vegetable beef soup, baked ham, mashed potatoes with gravy, vegetables, toasted and buttered bread, and desserts.



Tracy Rutt is learning to cook. He's in his third week at the kitchen as a volunteer. Angele Holm handed over the kitchen after Dec. 31 to other volunteers.

Linda Pinkham / The Pilot

Every week for the past 11 years, Angele Holm, age 69, has been cooking, joined by about half a dozen or more fellow volunteers. She said she'll be retiring on Jan. 31.

"I started working here in 2009, when they had the free clinic," she said. "My husband was an RN. He died seven years ago.

"This year has been very challenging for me, because of Ron (Hedenskog) and John (Stover) being gone. They were my partners, but they retired last year. It was fun.

"I've decided to spend more time with my family. I have four kids, 10 grandchildren and four great-grandchildren, spread out between Cave Junction, Grants Pass and Washington. I'm going to do some traveling and fix my house up.



Eddie Klein bastes the ham while another volunteer, Angel LeMieux, checks the vegetables.

Linda Pinkham / The Pilot

"I'm training Eddie Klein and Tracy Rutt," said Holm. "They will stay after I'm gone. Eddie is very familiar with the church, the community and this kitchen, and he'll get some other volunteers in here."

Klein cooks breakfast on Mondays and lunch on Saturdays, and makes bag lunches on Sundays. He's now cooking on Tuesdays, as well.

Klein said he's has been a volunteer at the soup kitchen for eight to 10 years. "I know most of the homeless folks here because, well, I'm homeless. I know Father Bernie and the 'churchies.' I know them because I am a member of the church.

"St. Tim's does a lot for the downtrodden," said Klein.

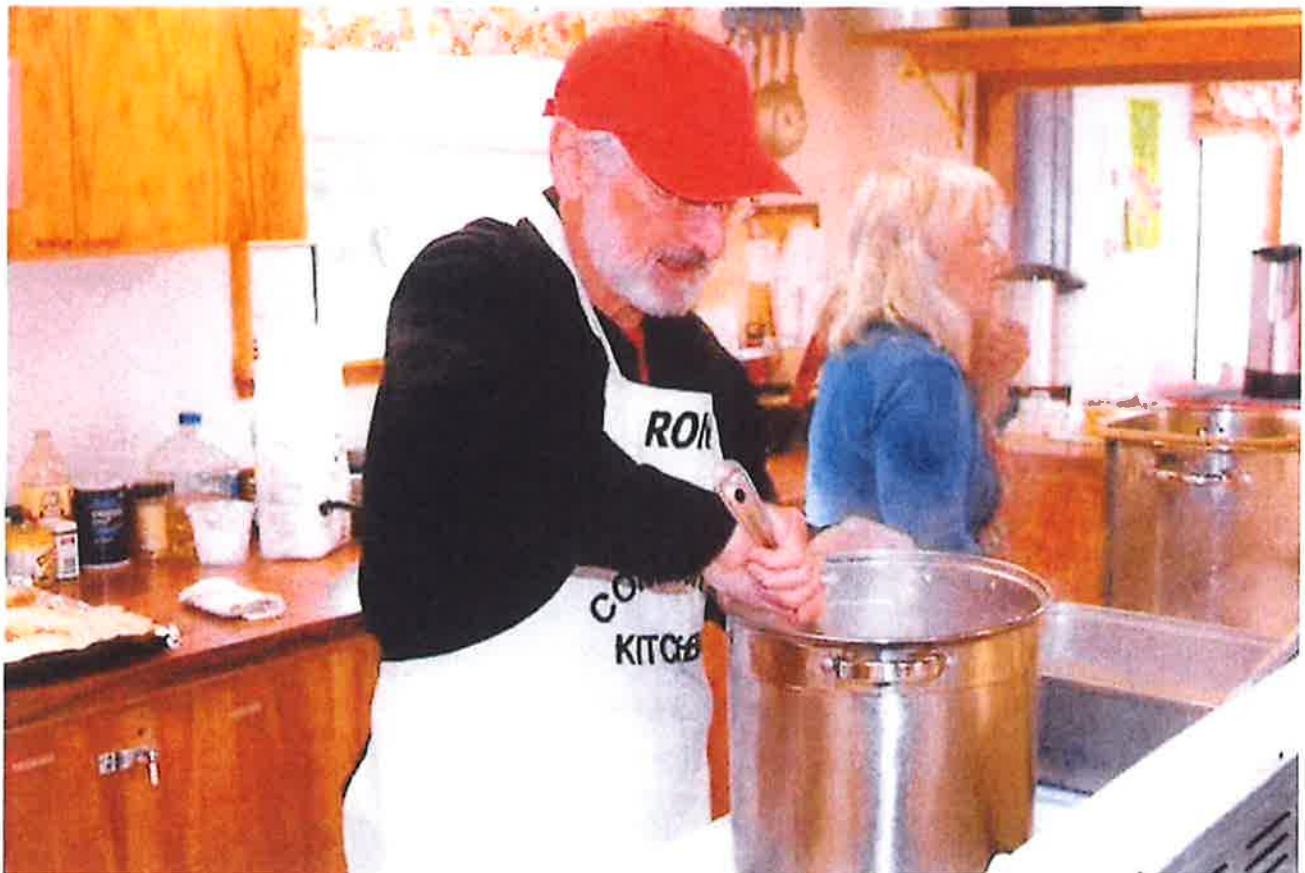
"It gives me something to do. Keeps me out of bars and houses of ill repute," he said with a laugh. "We're family oriented. It's fun."

"Eddie does everything here," Holm said, giving him a hug. "He takes care of everyone here."

In addition to providing meals several days a week, the church opens its showers upstairs for people to use every Monday, Wednesday and Friday morning.

Staff also hand out vouchers for The Old Wash House Laundromat at 97900 Shopping Center Ave. in Harbor for those who want to wash their clothing.

Holm was the last owner of Rubio's restaurant. "I had 20 years of cooking experience in restaurants before moving here. I learned how to delegate, how to push people around. Just kidding.



Tracy Rutt stirs the mashed potatoes.

Linda Pinkham / The Pilot

"Are the potatoes done yet?" Holm asks volunteer Rutt, who's in charge of the potatoes.

"Have you ever made mashed potatoes before?" she asks. "I'm not going to be here soon, so you're going to have to start thinking for yourself."

As for why he volunteers, Rutt said, "I'm a practicing Buddhist. I'm exploring that path to understand myself better through helping other people.

"This is my third week," he said. "I started from no-cook, to doing some cooking."

"He's still shaking in his boots," Holm ribbed.

"He's worried they're going to throw the food at him," said Angel LeMieux, a new volunteer.

"Angele (Holm) is changing her phone number as soon as she leaves."

The work for each Tuesday's meal begins on Sunday, when Holm decides what to cook and creates the menu. "If I don't have the menu by Sunday night, I can't sleep," she said.

On Monday, she goes shopping. Her food budget comes from the church and donations from the congregation. "I try to keep it as low as possible and use what I have first," she said.

"It runs about \$30 a week, which is pretty good for serving 60 people. I came from a family with nine children. I know how to save money."

Holm checks in again on the potatoes, which have had milk and a pound of butter added to them. "Do you think that's enough for 60 scoops? We can stretch it with some more milk. You can heat the milk in the microwave."

Then, she tastes the soup. "It'll be full up to here when it's done," she said, pointing to near the top of the 5-gallon pot, "by the time we get everything added." She likes to use fresh vegetables and adds plenty of garlic in the winter.



Rose Johnson has the day's menu done.

Linda Pinkham / The Pilot

Rose Johnson, who's 83, writes out what's on the menu. She usually gets a ride to the soup kitchen with Angele. "When she leaves, I'm going to leave, too," Johnson said.

Phillip Nelson, who's been volunteering for eight years, arrives to begin washing dishes.

"They've got all the pressure, I just do the easy work," said Nelson

Other volunteers who help out each week include Linda Nelson, dishes; Ursula Greger, server; and Diana Zelmer, baker.



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Congregation Close-up: St. Timothy's, Brookings

October 20, 2017 / [Webmaster](#)



In the years before the Affordable Care Act and the accompanying Medicaid expansion in Oregon, a volunteer-run clinic at St. Timothy provided health care for 25% of the working-age population in Brookings. One day during the clinic, a man in need of attention came (it seemed) out of the bushes. Long lacking access to bathing facilities, the man's odor and unwashed skin overwhelmed the doctor and made it impossible to conduct a thorough examination. Suddenly, a long-neglected shower fixture (installed in 1984 to accommodate youth group overnights that never actually happened) took on new purpose as the doctor ushered the man in to bathe, and the shower ministry of St. Timothy was born.

With the shower already in place, the church made one other essential ministry investment: prioritizing a budget with funds to hire two parish administrators, Clare Price and Pat Brookfield, to be on site during the hours the building is open. Rev. Bernie Lindley is quick to point out that Clare and Pat are not just secretaries – they are long-time members of St. Timothy and an important part of the ministry, providing caring faces and honoring the words of Jesus to bring a group of two or three together for prayer. And when they arrive to unlock the doors three mornings each week, the people who enter step into a place of welcome – and the possibility that they have as much to give as they receive.

Over the years, people coming for showers have taken on the responsibility of making the coffee and setting out the snacks available each day, creating a hospitable communal space. St. Timothy employs no custodial staff, and it is quite common for someone to take a shower and then spend a few minutes sweeping the steps or washing coffee cups. Two men come around each week to care for the community garden, taking ownership of that space and using their skills and energy to build something for the greater good. The vegetables they grow are regularly incorporated into the sack lunches and Community Kitchen meals provided by St. Timothy's feeding ministry.

In this county of just 14,000 people, the congregation of St. Timothy has a reputation for being a vital part of the social fabric in what is a largely unchurched area. With a bivocational priest (Bernie+ works as a commercial fisherman) the congregation's enthusiasm for and ownership of ministries is critical in keeping St. Timothy's doors open to everyone.



This energy overflows into the greater Brookings community and creates connections that draw in volunteers from outside the church. Showers are just one part of being clean, and when it became obvious that the church could not meet the need to wash clothes and sleeping bags, it was a mother's friend's daughter who owns a laundromat that stepped up to offer detergent and the use of her industrial-sized washers and dryers. Another woman provides haircuts, and others – acknowledging the church's history as a trustworthy funnel of goods and services – donate clothes, money, and even vehicles. Recently, a woman hours from living in her car came to St. Timothy for help. In what can only be described as God's perfect timing, someone had just donated a fifth wheel trailer, which by that very evening was set up in an RV park, giving the woman a new home.

For Bernie+, who was baptized into the congregation as a child, served as an acolyte in his youth, and was called to consider ordination by the parish's previous priest, St. Timothy is a place of transformation. He was molded by the congregation and encouraged by their commitment to outreach and caring for people in need. He cites Matthew 25:31-46 as a guiding inspiration for the people of St. Timothy, and credits parishioners with striving to deeply embody the values of love, justice and peace that they commit to in the Baptismal Covenant.

Visit the [St. Timothy's website](#).

This story was originally featured in the Summer 2017 edition of *In Conversation*, our diocesan magazine. To subscribe to the magazine, [email Heidi Pitts](#), Director of Communications.



City of Brookings

Temporary Emergency Rule 2020-1

WHEREAS on March 23, 2020, the City Council by Resolution 20-R-1174 declared a state of emergency due to the COVID-19 outbreak. It also authorized the City Manager, during this temporary State of Emergency, to take actions and issue orders necessary and reasonable to protect health, safety and welfare of the City and the public and to conduct activities that minimize or mitigate the effect of the emergency, as long as such actions or orders are in compliance with City, state and federal law; and

WHEREAS the City's municipal code, BMC 8.15.087, restricts RV use within the City; and

WHEREAS the City Manager recommends that the Council temporarily allow provisions included in ORS 203.082, Camping by Homeless on property of religious institutions, limited to the period we are under the Governor's "Stay Home, Stay Safe" order for COVID-19, and only to those individuals who have been residents over six months.

NOW therefore, the Council of the City of Brookings hereby temporarily adopts Rule 2020-1 as follows:

Camping by homeless on property of religious institutions:

(1) The City will temporarily allow churches, synagogues and similar religious institutions to offer overnight camping space on institution property to homeless persons living in vehicles.

(2) In addition to any conditions or limitations imposed by the City, a religious institution located within the City and offering camping space described under subsection (1) of this section must:

(a) Limit camping space at the institution site to three or fewer vehicles at the same time; and

(b) Provide campers with access to sanitary facilities, including but not limited to toilet, hand washing and trash disposal facilities.

City of Brookings **WORKSHOP Agenda**

CITY COUNCIL

Monday August 30, 2021, 5:00pm

City Hall EOC, 888 Elk Drive, Brookings, OR 97415

A. Call to Order

B. Roll Call

C. Topics

1. Municipal Code Revisions – Benevolent Meal Services [Pg. 1]
 - a. Proposed BMC Chapter 17 Revisions [Pg. 2]
2. Municipal Code Revisions – Accessory Dwelling Unit [Pg. 5]
 - a. Proposed BMC Chapter 17.180 Revisions [Pg. 6]

D. Council Member Requests for Workshop Topics

E. Adjournment

All public City meetings are held in accessible locations. Auxiliary aids will be provided upon request with at least 72 hours advance notification. Please contact 469-1102 if you have any questions regarding this notice.

Due to the COVID-19 virus, meeting participants in the EOC will be limited and social distancing of six (6) feet will be required and maintained.

CITY OF BROOKINGS

COUNCIL WORKSHOP REPORT

Meeting Date: August 30, 2021



Signature (submitted by)

Originating Dept: PW/DS



City Manager Approval

Subject:

Municipal Code Revisions – Benevolent Meal Services Conditional Use Permit

Background/Discussion:

Staff received direction from Council at the August 2nd workshop to propose revisions to the Brookings Municipal Code (BMC) that would provide a method for local churches and other non-profits to obtain a conditional use permit in order to provide benevolent meal services in a residential zone. Oregon Health Authority (OHA) has classified the community kitchens (St. Timothy's Episcopal Church, Star of the Sea Catholic Church and the Presbyterian Church) as "restaurants". The BMC doesn't allow restaurants either outright or conditionally, as they are currently operating in the church's community kitchens, within residential districts (R-1, R-2, R-3).

Staff, in cooperation with legal counsel from Local Government Law Group, reviewed code sections of the BMC and have developed draft changes to language that would address Council direction to create a method for allowing benevolent meal services in churches, in a residential zone, under a conditional use permit.

Chapters included for review:

17.08.020 B Terms
17.20 Single-Family Residential (R-1) District
17.24 Two-Family Residential (R-2) District
17.28 Multi-Family Residential (R-3) District
17.124 Specific Standards Applying to Conditional Uses

Proposed revisions include defining benevolent meal services, creating language in the code to list benevolent meal services as a conditional use in residential zones, and a draft of the criteria required for the conditional use permit.

Staff is seeking direction from Council on proposed changes to language in the BMC. With consensus, staff will recommend BMC changes to the Planning Commission, as these are related to Chapter 17, Land Development Code; and if approved by the Planning Commission, staff will recommend Ordinance to the City Council for adoption.

Attachments:

- a. Proposed BMC Chapter 17 revisions

Title 17
LAND DEVELOPMENT CODE

17.08.020 B terms.

"Basement" means a space wholly or partly underground, and having more than one-half of its height, measured from its floor to its ceiling, below the average adjoining finished grade; if the finished floor level directly above a basement is more than six feet above finished grade at any point, such space shall be considered a story.

"Bed and breakfast" means the rental of one or more rooms in an owner-occupied, single-family residence where a breakfast meal is served during the a.m. hours only.

"Benevolent Meal Service" means a periodic food service operation that provides food to the public without charge.

"Building" means any structure built and maintained for the support, shelter or enclosure of persons, animals, or property of any kind.

"Building, main" means a building within which is conducted the principal use permitted on the lot or parcel, as provided in this code. [Ord. 08-O-606 § 2; Ord. 03-O-446.SS; Ord. 91-O-446.F § 1; Ord. 89-O-446 § 1.]

Chapter 17.20
SINGLE-FAMILY RESIDENTIAL (R-1) DISTRICT

17.20.040 Conditional uses.

The following conditional uses may be permitted subject to a conditional use permit:

A. Recreation uses and facilities, including country clubs, golf courses, and swimming clubs, but not including such intensive commercial recreation uses as a golf driving range, race track or amusement park;

B. Churches, subject to BMC [17.124.100](#);

C. Hospitals, rest, nursing and convalescent homes, subject to BMC [17.124.100](#);

D. Public or private schools, but not including a business, dancing, trade, technical or similar school, and subject to BMC [17.124.011](#);

- E. Nursery schools and day care facilities, subject to BMC [17.124.010](#);
- F. Governmental structures or uses including parks and recreation facilities, fire stations, libraries, and museums, but not including storage or repair yards, warehouses or similar uses;
- G. Riding academies and public stables, subject to BMC [17.124.070](#);
- H. Cemeteries, mortuaries, crematories, mausoleums, and columbariums, subject to BMC [17.124.090](#);
- I. Excavation and removal of sand, gravel, stone, soil or other earth products, subject to BMC [17.124.020](#) (commercial excavations);
- J. Public and quasi-public halls, lodges and clubs, subject to BMC [17.124.120](#);
- K. The keeping of horses, cattle, sheep and other livestock, subject to BMC [17.124.190](#);
- L. Planned unit developments, including duplex or multifamily development, subject to provisions of Chapter [17.116](#) BMC;
- M. Utility substations or pumping stations, subject to BMC [17.124.030](#);
- N. Bed and breakfast facilities, subject to the provisions of BMC [17.124.140](#);
- O. Dwelling groups, subject to BMC [17.124.180](#);
- P. Signs appurtenant to any conditional use and which do not comply with BMC [17.20.080](#);
- Q. Short-term rentals pursuant to the provisions of BMC [17.124.170](#);
- R. Poultry farms and eggeries, subject to the provisions of BMC [17.124.040](#);
- S. Temporary living quarters for caretakers, subject to the provisions of BMC [17.124.200](#);
- T. Cottage industries, subject to BMC [17.124.220](#);
- U. Amateur radio facilities, accessory to a dwelling, subject to the provisions of BMC [17.124.230](#).
- V. Benevolent Meal Service, as a primary use or in combination with another use permitted outright or conditionally, subject to BMC [17.124.050](#).

[Ord. 16-O-752 § 3; Ord. 14-O-722 § 3; Ord. 08-O-612 § 2; Ord. 01-O-446.MM; Ord. 98-O-446.DD § 4; Ord. 95-O-446.Y § 2; Ord. 95-O-446.X § 3; Ord. 93-O-446.L § 2; Ord. 91-O-446.D § 1; Ord. 89-O-446 § 1.]

This would repeat in R2 & R3 zoning districts

Chapter 17.124

SPECIFIC STANDARDS APPLYING TO CONDITIONAL USES

17.124.050 Benevolent Meal Service

A. Organizations or individuals providing benevolent meal services may serve meals to the public up to ____ day(s) per week between the hours of __am and __pm. No benevolent meal service shall last more than ____ hours.

B. Benevolent meal services shall comply with all applicable state and county public health requirements and shall maintain any permits, licenses, or certifications required to provide such services at all times.

C. Benevolent meal services must utilize off-street parking facilities that comply with all applicable requirements of the Brookings Municipal Code. Off-street parking facilities shall include screening measures to reduce noise and other impacts to abutting properties.

D. Any structures used to provide benevolent meal services shall comply with all applicable city, county, and state requirements related to building, fire, and public works standards,

E. An organization providing benevolent meal services must meet the requirements of a charitable organization under Section 501(c)(3) of the Internal Revenue Code.

PLANNING COMMISSION AGENDA

CITY OF BROOKINGS
Council Chambers - 898 Elk Drive
October 5, 2021 at 7:00 PM



1. CALL TO ORDER - PLEDGE OF ALLEGIANCE
2. ROLL CALL
3. PLANNING COMMISSION CHAIR PERSON ANNOUNCEMENTS
4. PUBLIC HEARINGS

4.1 In the matter of File No. LDC-1-21, city initiated, revisions to the Brookings Municipal Code, Title 17 Land Development Code, Chapter 17.180, Workforce Housing, Section 17.180.040, deleting paragraph D. The criteria used to decide this matter is found in Chapter 17.140, Amendments, of the Brookings Municipal Code. This is a legislative hearing and the Planning Commission will make a recommendation to City Council on this matter.

4.2 In the matter of File No. LDC-2-21, city initiated, revisions to the Brookings Municipal Code, Title 17 Land Development Code, Chapter 17.08.020 adding a definition of Benevolent Meal Service, Chapters 17.20.040, 17.24.040 and 17.28.040 adding Benevolent Meal Service as a Conditional Use. The criteria used to decide this matter is found in Chapter 17.140, Amendments, of the Brookings Municipal Code. This is a legislative hearing and the Planning Commission will make a recommendation to City Council on this matter.

5. MINUTES FOR APPROVAL
 - 5.1 Minutes of Planning Commission meeting of September 7, 2021
6. UNSCHEDULED PUBLIC APPEARANCES
7. REPORT FROM THE PLANNING STAFF
8. COMMISSION FINAL COMMENTS
9. ADJOURNMENT

Unscheduled public appearances and comments are limited to 5 minutes. All public meetings are held in accessible locations. Auxiliary aids will be provided upon request with advance notification. Please contact 469-1103 if you have any questions regarding this notice.

You can view the Planning Commission meeting LIVE on television on Charter PEG Channel 181; stream it LIVE on a computer by copying and pasting the following link inside your web browser: <mms://68.185.2.46:8080>; or to stream it LIVE on a mobile device you will need to download the VLC Media Player which is available at: <https://or-brookings2.civicplus.com/252/Watch-Meetings-Live> and follow directions and links for your device.

CITY OF BROOKINGS PLANNING COMMISSION
STAFF REPORT

SUBJECT: Land Development Code Amendment
FILE NO: LDC-2-21
HEARING DATE: October 5, 2021

REPORT DATE: September 23, 2021
ITEM NO: 4.2

GENERAL INFORMATION

APPLICANT: City Initiated
REPRESENTATIVE: City Staff
REQUEST: Revisions to the Brookings Municipal Code (BMC), Title 17 Land Development Code, Chapter 17.08.020 adding a definition of Benevolent Meal Service, Chapters 17.20.040, 17.24.040 and 17.28.040 adding Benevolent Meal Service as a Conditional Use and addition to Chapter 17.124 adding specific standards for Benevolent Meal Services
PUBLIC NOTICE: Published September 10, 2021 in local newspaper

BACKGROUND INFORMATION

Staff received direction from Council and Planning Commission, at a joint workshop held August 30, 2021, to propose revisions to the BMC that would provide a method for local churches and other non-profits to obtain a Conditional Use Permit in order to provide benevolent meal services in a residential zone. Oregon Health authority (OHA) has classified the community kitchens located at St. Timothy's Episcopal Church, Star of the Sea Catholic Church and the Presbyterian Church as restaurants. The BMC does not allow "restaurants" either outright or conditionally as they are currently operating within residential districts (R-1, R-2, R-3).

Staff is proposing revisions to the BMC that would create a method for allowing benevolent meal services in churches, in a residential zone, under a Conditional Use Permit.

Chapters 17 sections included for review:

Section 17.08.020 B Terms
Section 17.20.040, 17.24.040, 17.28.040 Conditional Uses
Section 17.124 Specific Standards Applying to Conditional Uses.

Proposed revisions include adding the definition of Benevolent Meal Services in Section 17.08.020 B Terms, adding benevolent meal services as a conditional use in Sections 17.20.040, 17.24.040 and 17.28.040.

Proposed revisions to Chapter 17 Land Development Code, Sections;

17.08.020 B Terms

"Benevolent meal service" means a periodic food service operation that provides food to the public without charge.

17.20.040 Conditional Uses.

V. Benevolent meal services, as a primary use or in combination with another use permitted outright or conditionally, subject to BMC 17.124.050

17.24.040 Conditional Uses.

W. Benevolent meal services, as a primary use or in combination with another use permitted outright or conditionally, subject to BMC 17.124.050

17.28.040 Conditional Uses.

U. Benevolent meal services, as a primary use or in combination with another use permitted outright or conditionally, subject to BMC 17.124.050

17.124.050 Benevolent Meal Service

A. Organizations or individuals providing benevolent meal services may serve meals to the public up to 2 days per week between the hours of 9am and 5pm. Benevolent meal services shall last no more than three hours per day.

B. Benevolent meal services shall comply with all applicable state and county public health requirements and shall maintain any permits, licenses, or certifications required to provide such services at all times.

C. Benevolent meal services must utilize off-street parking facilities that comply with all applicable requirements of the Brookings Municipal Code. Off-street parking facilities shall include screening measures to reduce noise and other impacts to abutting properties.

D. Any structures used to provide benevolent meal services shall comply with all applicable city, county and state requirements related to building, fire and public works standards.

E. An organization providing benevolent meal services must meet the requirements of a charitable organization under Section 501(c)(3) of the Internal Revenue Code.

RECOMMENDATION

Staff supports a Planning Commission recommendation of approval to the City Council of file #LDC-2-21; revisions to the Brookings Municipal Code (BMC), Title 17 Land Development Code, Chapter 17.08.020 adding a definition of Benevolent Meal Service, Chapters 17.20.040, 17.24.040 and 17.28.040 adding Benevolent Meal Service as a Conditional Use and addition to Chapter 17.124 adding specific standards for Benevolent Meal Services.

BROOKINGS PLANNING COMMISSION MINUTES

October 5, 2021

CALL TO ORDER

The regular meeting of the Brookings Planning Commission was called to order by Chair Wulkowicz at 7:00 pm in the Council Chambers at Brookings City Hall followed by the Pledge of Allegiance.

ROLL CALL

Commissioners Present: Anthony Bond, Cody Coons, Skip Hunter by phone, Clayton Malmberg, Skip Watwood, Chair Gerald Wulkowicz

Commissioners Absent: Bill Hamilton

Staff Present: PWDS Director Tony Baron, Planning Tech Lauri Ziemer

Audience - 3

PLANNING COMMISSION CHAIR PERSON ANNOUNCEMENTS –None

PUBLIC HEARINGS

- 4.1 In the matter of File No. LDC-1-21, revisions to Chapter 17.180, Workforce Housing, Section 17.180.040, deleting paragraph D. City initiated.

There was no ex parte contact, bias, personal interest, or conflicts of interest declared and no objection to the jurisdiction of the Planning Commission to hear the matter. The public hearing was opened at 7:02 pm. PWDS Director Tony Baron reviewed the staff report. No members of the public spoke in opposition and no participant requested additional time to submit materials. The public hearing was closed at 7:07 pm.

The Commission deliberated on the matter. **Motion made by Commissioner Coons that Planning Commission recommend to City Council approval of File No. LDC-1-21; revising the Brookings Municipal Code, Chapter 17.180, Workforce Housing, Section 17.180.040, by deleting paragraph D based on the Staff Report recommendation; motion seconded and with no further discussion by a 6-0 vote the motion carried.**

- 4.2 In the matter of File No. LDC-2-21, revisions to Chapter 17.08.020 adding a definition of Benevolent Meal Service, Chapters 17.20.040, 17.24.040 and 17.28.040 adding Benevolent Meal Service as a Conditional Use and addition to Chapter 17.124 adding specific standards for Benevolent Meal Services, City initiated.

Commissioner Coons declared a potential conflict of interest and recused himself from the hearing. There was no other ex parte contact, bias, personal interest, or conflicts of interest declared and no objection to the jurisdiction of the Planning Commission to hear the matter. The public hearing was opened at 7:09 pm. PWDS Director Tony Baron reviewed the staff report.

Father Bernie Lindley, St. Timothy's Episcopal Church, 401 Fir Street, Brookings, OR spoke in opposition stating they serve meals four days a week, have no desire to apply for a permit and would be in violation if a permit was required. No participant requested additional time to submit materials. The public hearing was closed at 7:21 pm.

The Commission deliberated on the matter. **Motion made by Commissioner Watwood that Planning Commission recommend to City Council approval of File No. LDC-2-21; revisions to the Brookings Municipal Code, Title 17 Land Development Code, Chapter 17.08.020 adding a definition of Benevolent Meal Service; in Chapters 17.20.040, 17.24.040 and 17.28.040, adding Benevolent Meal Service as a Conditional Use and the addition to Chapter 17.124 of adding specific standards for Benevolent Meal Services; motion seconded and Commission voted with Commissioners Bond, Watwood and Malmberg voting in favor and Commissioner Hunter and Chair Wulkowicz voting against. By a 3-2 vote (Commissioner Coons recused) the motion carried.**

MINUTES FOR APPROVAL

- 5.1 Minutes of regular Planning Commission meeting of September 7, 2021.

Motion made by Commissioner Bond to approve the Planning Commission minutes of September 7, 2021; motion seconded, with no further discussion by a 5-0 vote the motion carried, with Commissioner Malmberg abstaining as he did not attend the meeting.

UNSCHEDULED PUBLIC APPEARANCES – None

REPORT FROM THE PLANNING STAFF – PWDS Director Baron advised two Conditional Use Permits for short term rentals will be on the November Planning Commission agenda.

COMMISSION FINAL COMMENTS - None

ADJOURNMENT

Chair Wulkowicz adjourned the meeting at 7:35 pm.

Respectfully submitted,



Gerald Wulkowicz, Brookings Planning Commission
Approved at the November 2, 2021 meeting

City of Brookings

MEETING AGENDA

CITY COUNCIL

Monday, October 25, 2021, 7:00pm

City Hall Council Chambers, 898 Elk Drive, Brookings, OR 97415

CITY COUNCIL

A. Call to Order

B. Pledge of Allegiance

C. Roll Call

D. Ceremonies/Appointments/Announcements

1. Red Ribbon Week Proclamation [Pg. 1]

E. Oral Requests and Communications from the audience

(*Public Comments on non-agenda items – five (5) minute limit per person, please submit Public Comment Form in advance)

F. Consent Calendar

1. Approve Council minutes for October 11, 2021 [Pg. 2]
2. Accept Financials for September 2021 [Pg. 4]

G. Staff Reports/Public Hearings/Ordinances/Resolutions/Final Orders

1. KCIW Memorandum of Understanding Extension [Pg. 10]
 - a) KCIW letter, requesting extension [Pg. 12]
 - b) Current MOU [Pg. 13]
2. Land Development Code Revisions – Accessory Dwelling Unit [Pg. 15]
 - a) Ordinance 21-O-794 [Pg. 16]
 - b) Exhibit A [Pg. 17]
3. Conditional Use Permit – Benevolent Meal Services [Pg. 18]
 - a) Ordinance 21-O-795 [Pg. 20]
 - b) Exhibit A [Pg. 21]

H. Remarks from Mayor and Councilors

I. Adjournment

*Public Comment forms and the agenda packet are available on-line at www.brookings.or.us, at Brookings City Hall and at Chetco Community Public Library. Return completed Public Comment forms to the City Recorder before the start of the meeting or during regular business hours.

All public meetings are held in accessible locations. Auxiliary aids will be provided upon request with at least 72 hours advance notification. Please contact 469-1102 if you have any questions regarding this notice.

Due to the COVID-19 virus, meeting participants in the council chambers will be limited and social distancing of six (6) feet will be required and maintained. If you would like to view the City Council Meeting live, you can via:

-Television – Charter Channel 181

-Internet – Go to the City of Brookings website at <http://www.brookings.or.us>

Watch Meeting Live instructions: 1. Visit the City of Brookings website home page. 2. Click on Government (top page). 3. Click on City Council (right side). 4. Under Agenda & Meetings click Watch Meeting Live. 5. You will need to download the VLC Media Player. Follow directions and links for your device.


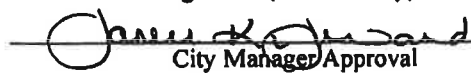
On computers, it is possible to stream the meetings LIVE by copying and pasting the following link inside your web browser: <mms://68.185.2.46:8080>

CITY OF BROOKINGS

COUNCIL AGENDA REPORT

Meeting Date: October 25, 2021

Originating Dept: PW/DS


Signature (submitted by)

City Manager Approval

Subject:

Conditional Use Permit - Benevolent Meal Service

Recommended Motion:

1. Approve file LDC-2-21 and adopt ordinance 21-O-795 amending the Brookings Municipal Code Chapter 17, Sections 17.08.020 B Terms, 17.20.040, 17.24.040, 17.28.040 Conditional Uses and 17.124 Specific Standards Applying to Conditional Uses.
2. Approve waiver for entities that apply for CUP under above mentioned sections for 3 months from adoption of Ordinance 21-O-795.

Financial Impact:

None

Background/Discussion:

Staff received direction from Council and Planning Commission at a joint workshop held on August 30, 2021 to propose revisions to the Brookings Municipal Code (BMC) that would provide a method for local churches and other non-profits to obtain a conditional use permit in order to provide benevolent meal services in a residential zone. Oregon Health authority (OHA) has classified the community kitchens located at St. Timothy's Episcopal Church, Star of the Sea Catholic Church and the Presbyterian Church as restaurants. The BMC doesn't allow "restaurants" either outright or conditionally as they are currently operating within residential districts (R-1, R-2, R-3).

Staff is proposing revisions to the BMC that would create a method for allowing benevolent meal services in churches and other non-profits, in a residential zone, under a conditional use permit.

At the October 5th meeting, the Planning Commission reviewed and recommended approval of file LDC-2-21 and adoption of ordinance 21-O-795 amending the Brookings Municipal Code Chapter 17, Sections 17.08.020 B Terms, 17.20.040, 17.24.040, 17.28.040 Conditional Uses and 17.124 Specific Standards Applying to Conditional Uses.

City Council indicated at the workshop that any planning fees associated with a CUP for benevolent meal services would be waived for an initial period (i.e. 3 months). After 3 months, an organization could still individually request that waiver.

Attachment(s):

- a. Ordinance 21-O-795
- b. Exhibit A

IN AND FOR THE CITY OF BROOKINGS
STATE OF OREGON
ORDINANCE 21-O-795

**IN THE MATTER OF ORDINANCE 21-O-795, AN ORDINANCE AMENDING A SUBSECTION OF
BROOKINGS MUNICIPAL CODE IN CHAPTER 17 LAND DEVELOPMENT CODE**

Sections:

- Section 1. Ordinances Identified.
- Section 2. Amends Chapter 17, Section 17.08.020 B Terms
 - Amends Chapter 17, Section 17.20.040 Conditional Uses
 - Amends Chapter 17, Section 17.24.040 Conditional Uses
 - Amends Chapter 17, Section 17.28.040 Conditional Uses
 - Amends Chapter 17, Section 17.124 Specific Standards Applying to Conditional Uses

The City of Brookings ordains as follows:

Section 1. Ordinance Identified. This ordinance amends the Brookings Municipal Code Chapter 17 Land Development Code.

Section 2. Amends Chapter 17, Sections 17.08.020 B Terms, 17.20.040 Conditional Uses, 17.24.040 Conditional Uses, 17.28.040 Conditional Uses, and 17.124 Specific Standards Applying to Conditional Uses are hereby amended to read as presented in Exhibit A attached hereto with additions designated in bold and underlined and deletions being bold and struck out.

First Reading: _____ Passage: _____

Second Reading: _____ Effective Date: _____

Signed by me in authentication of its passage this 25th day of October 2021.

ATTEST:

Mayor Ron Hedenskog

City Recorder Janell K Howard

Exhibit A

Conditional Uses - Benevolent Meal Services

Changes to BMC:

(additions are **bold and underlined**, deletions are ~~**bold and underlined**~~)

Chapter 17

LAND DEVELOPMENT CODE

17.08.020 B Terms

“Benevolent meal service” means a periodic food service operation that provides food to the public without charge

Chapter 17.20

SINGLE-FAMILY RESIDENTIAL (R-1) DISTRICT

17.20.040 Conditional Uses.

V. Benevolent meal services, as a primary use or in combination with another use permitted outright or conditionally, subject to BMC 17.124.050

Chapter 17.24

TWO-FAMILY RESIDENTIAL (R-2) DISTRICT

17.24.040 Conditional Uses.

W. Benevolent meal services, as a primary use or in combination with another use permitted outright or conditionally, subject to BMC 17.124.050

Chapter 17.28

MULTIPLE-FAMILY RESIDENTIAL (R-3) DISTRICT

17.28.040 Conditional Uses.

U. Benevolent meal services, as a primary use or in combination with another use permitted outright or conditionally, subject to BMC 17.124.050

Chapter 17.124

SPECIFIC STANDARDS APPLYING TO CONDITIONAL USES

17.124.050 Benevolent Meal Service

A. Organizations or individuals providing benevolent meal services may serve meals to the public up to 2 days per week between the hours of 9am and 5pm. No benevolent meal service shall last more than three hours per day.

B. Benevolent meal services shall comply with all applicable state and county public health requirements and shall maintain any permits, licenses, or certifications required to provide such services at all times.

C. Benevolent meal services must utilize off-street parking facilities that comply with all applicable requirements of the Brookings Municipal Code. Off-street parking facilities shall include screening measures to reduce noise and other impacts to abutting properties.

D. Any structures used to provide benevolent meal services shall comply with all applicable city, county and state requirements related to building, fire and public works standards.

E. An organization providing benevolent meal services must meet the requirements of a charitable organization under Section 501(c)(3) of the Internal Revenue Code.

City of Brookings
CITY COUNCIL MEETING MINUTES
City Hall Council Chambers, 898 Elk Drive, Brookings, OR 97415
Monday, October 25, 2021

Call to Order

Mayor Hedenskog called the meeting to order at 7:01 PM

Roll Call

Council Present: Mayor Ron Hedenskog, Councilors Brad Alcorn, Ed Schreiber, John McKinney, and Michelle Morosky; a quorum present

Staff present: City Manager Janell Howard, Public Works Director Tony Baron, Deputy Public Works Director Jay Trost, Deputy Finance Director Lu Ehlers, and Deputy Recorder Natasha Tippetts

Media Present: 2

Others Present: 29 audience members

Ceremonies

1. Award Red Ribbon Week Proclamation to Emblem Club

Oral Requests and Communications from the Audience

1. Mike Murphy – PO Box 953, Brookings; provided information about the proposed Harbor Water plant
2. Bob Webb – 22 Seascapes Court, Brookings; provided opinion on public safety
- 3.

Consent Calendar

1. Approve Council minutes for October 11, 2021
2. Accept Financials for September 2021

Councilor Schreiber moved, Councilor McKinney seconded, and Council voted unanimously to approve the Consent Calendar.

Staff Reports

1. **KCIW Memorandum of Understanding Extension**

Staff report presented by Janell Howard

Doug Hansen spoke on behalf of KCIW

Councilor McKinney moved, Councilor Alcorn seconded, and Council voted unanimously to deny the extension of the KCIW Memorandum of understanding.

2. **Land Development Code Revisions – Accessory Dwelling Unit**

Staff report presented by Tony Baron

Councilor Schreiber moved, Councilor Alcorn seconded, and Council voted unanimously on Ordinance 21-O-794 to be read by title only.

Councilor McKinney moved, Councilor Schreiber seconded, and Council voted unanimously on adopting Ordinance 21-O-794.

3. **Conditional Use Permit – Benevolent Meal Services**

Staff report presented by Tony Baron

Oral Requests:

1. Tracy Rupp, 97371 Marina Loop, Brookings; provided opinion in support of St. Timothy's Episcopal Church services
2. Diana Cooper, 805 Paradise Lane, Brookings; spoke in support of services from St. Timothy's Episcopal Church
3. Bernie Lindley, 401 Fir Street, Brookings; gave opinion on public records in regards to this Ordinance
4. Hank Cunningham, 520 Redwood Street, Brookings; spoke in support of services from St. Timothy's Episcopal Church
5. Teresa Lawson, 820 Brookhaven Drive, Brookings; spoke in support of services from St. Timothy's Episcopal Church
6. Reverend Linda Lee, 98874 North Bank Road, Brookings; spoke in support of services from St. Timothy's Episcopal Church
7. Bill Hamilton, 1 Park Avenue, Brookings; spoke in support of services from St. Timothy's Episcopal Church

Councilor Schreiber moved, Councilor Morosky seconded, and Council voted unanimously on Ordinance 21-O-795 to be read by title only.

Councilor McKinney moved, Councilor Alcorn seconded, and Council voted unanimously on adopting Ordinance 21-O-795.

Councilor Schreiber moved, Councilor McKinney seconded, and Council voted unanimously to waive Conditional Use Permit Fees to those who apply within 90 days.

Remarks from Mayor and Councilors

All Council remarked that they are attempting to find a middle solution to both public and church.

Adjournment

Mayor Hedenskog moved, Councilor Mckinney seconded and Council voted unanimously to adjourn the meeting at 8:02 PM

Respectfully submitted:

ATTESTED:
this 8th day of November, 2021:



Ron Hedenskog, Mayor



Janell K. Howard, City Recorder

bend church

UNITED METHODIST



Rev. Jen Stuart
Lead Pastor

Attn: City Council, Brookings, OR

Dear Brookings City Council Members,

I'm writing this letter of explanation and support for St. Timothy Episcopal Church in Brookings.

As a church that also follows the teachings of Jesus Christ, Bend Church ministers to the least, the last, and the lost by providing a mail address and mail service for those who are houseless. Because of this "Open Door Ministry," these people have a way of receiving checks, driver's licenses, and ID cards, among other necessary documents and communications.

Our Open Door Ministries also provide free snack foods, free clothing and other personal items that are needed. Two volunteers staff the mailroom for two hours a day, five days a week, with a total of 16 volunteers on the roster. Approximately four volunteers staff the Open Store (free clothing) two days a week for two hours each day during the time the mailroom is open. Emergency financial assistance for utility bills, rent, and purchasing necessary items to survive is also offered through our Compassionate Care Ministry one day a week. There are three volunteers who work in that capacity. This amounts to around 24 volunteers offering these services on site for a total of approximately 720 hours per year.

As followers of Jesus Christ, His churches are admonished to care for the needy. This is part of what identifies us as Christians and is an integral part of any Christian church. We cannot separate ourselves from following the commandments of Jesus—they are as important as the prayers we pray, the sermons we hear and try to follow, and the songs we sing to our God, the Christ, and the Holy Spirit. It would be unimaginable to say that a church cannot follow these teachings found in the Bible.

There are many more ways Bend Church—and many other churches—serve their communities through use of church facilities by Montessori Schools, Day Care centers, Boys and Girls Clubs, 12-step organizations, and exercise programs to name a very few. In addition, Bend Church helped start and continues to partner with Central Oregon Villages for solutions to our houseless emergency.

I sincerely hope that the Brookings City Council looks very carefully at the intent of this action and also considers how much churches, synagogues, and mosques contribute to every community in ways which others are not aware.

Patricia Luce
Co-Coordinator
Open Door Ministries
Bend United Methodist Church