The Court of Appeals observed that this court has offered little guidance concerning what it means for provisions to be "closely related" under the separate-vote analysis, other than applying that criterion in a handful of cases. See Meyer, 205 Or.App. at 308 n. 5, 134 P.3d 1005 (so stating). But, if this court has written little on the subject, it is **1038 because there have been few instances in which the constitutional changes before the court presented a close question on that issue. In some cases, this court has needed to focus on only the different parts of the constitution being amended to conclude that the changes at issue were clearly unrelated, because they involved different changes to different fundamental rights affecting different groups of people. See, e.g., League of Oregon Cities, 334 Or. at 674–75, 56 P.3d 892 (amendments contained in single constitutional measure expanded Article I, section 18, property rights for some property owners, while simultaneously limiting Article I, section 8, free expression rights for other property owners). In other cases, this court focused on the different provisions contained in the amendatory measure itself and concluded that the changes that they would have made to the constitution were themselves so divergent as to render them "not closely related." See, e.g., Swett, 333 Or. at 597, 43 P.3d 1094 (invalidating measure that encompassed adding constitutional campaign contribution disclosure requirement, as well as constitutional requirement that signature gatherers for initiative petitions be registered to vote in Oregon).

Meyer v. Bradbury, 341 Or 288, 300, 142 P3d 1031, 1037–38, 2006 WL 2567430 (2006)