



HOSPITAL SERVICES | FAMILY MEDICINE | WOMEN'S HEALTH | INTERNAL MEDICINE | SPECIALTY SERVICES
LONG TERM CARE | OCCUPATIONAL HEALTH SERVICES | SCHOOL BASED HEALTH

November 19, 2013

Mr. Jim Cagney
Northwest Colorado Director
Bureau of Land Management
2815 H Road
Grand Junction, CO 81506

RE: Northwest Colorado Greater Sage-Grouse Draft Land Use Plan Amendment and Environmental Impact Statement

Dear Mr. Cagney,

In 1961, voters approved the formation of a special taxing district known today as the Grand River Hospital District (District) to ensure the availability of local healthcare. One year later, the District opened Clagett Memorial Hospital and began serving patients.

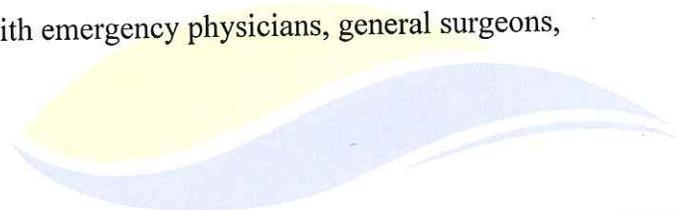
Since that time, our District serves families and citizens in Garfield County through the following facilities:

- Grand River Hospital and Medical Center;
- Grand River Medical Clinics in Rifle;
- Battlement Mesa Medical Center;
- E. Dene Moore Care Center (our long-term care facility in Rifle);
- Grand River Health and Safety Center (our occupational health and physical therapy facility in Battlement Mesa);
- Grand River Student Health Center in Parachute and Rifle servicing local school districts.

Grand River Hospital District serves 27,000+ individuals within our 1,500 square-mile service territory. The District accomplishes this through the dedication of over 300 employees and over 55 affiliated physicians.

The Grand River Hospital District provides:

- Emergency Services as a trauma level IV with emergency physicians, general surgeons, nurses and other medical specialists;



- Acute Care round-the-clock for patients with complex medical conditions or surgical concerns;
- Imaging Services, which include the nation's first revolutionary 3D breast tomosynthesis mammography technology providing diagnostic accuracy for women, x-rays, bone mineral density, ultrasound, echocardiography, CT, MRI and nuclear medicine;
- Laboratory Services, Mayo Clinic affiliated, that provide phlebotomy, histology, blood bank, chemistry, immunochemistry, hematology/urinalysis, coagulation, newborn testing and microbiology;
- Cardiopulmonary Services that provide respiratory specialist in airway management and administer diagnostic, non-invasive tests such as an EKG, pulmonary function test and treadmill stress tests;
- Perioperative Services that perform relevant diagnostic tests prior to any surgical procedure, administer IVs and any required advance medications, and after surgery, provide any Post Anesthesia Care; and
- Pharmacy Services that are patient focused and include medication delivery, therapeutic recommendations and promotion of optimal drug therapy

The District is governed by an elected Board of Directors made up of seven dedicated individuals who care about the well-being of the community.

It has come to our attention that the Bureau of Land Management (BLM) has been preparing a Draft Environmental Impact Statement (DEIS) for the Greater Sage-Grouse to amend and update your Land Use Plan and Land Management Plan since December, 2011. As a political subdivision of the State of Colorado, we hereby notice the BLM of your failure to coordinate the DEIS with our District and our seven-member Board of Directors.

Our charge is to provide the best affordable healthcare to the citizens of this region. In order to carry out this charge given to us by the citizens of this community, we have the responsibility to provide the community we serve with exceptional health care now and into the future that's affordable and efficient.

None of the proposed conservation measures for the Greater Sage-Grouse carried forward in the DEIS were coordinated with our District. As a result, the harm that will come to our District as a result of these policies have not been addressed in the document and brought to the public light for further consideration by the public and decision makers. The impacts of these alternatives to human life are devastating, but they have not been considered and, therefore, could not be properly weighed in the analysis as to which of the alternatives would be preferable.

Because of this failing, the Grand River Hospital District formally requests that a supplemental statement be prepared to ensure that the environmental consequences of the four alternatives are properly analyzed by including the direct, indirect and cumulative impacts on our District and the health and safety of the people we protect.



Failure to Coordinate:

Our District falls squarely within the jurisdictional boundaries of your planning area and we are dependent upon and impacted by the use of federal lands managed by your agency. Therefore, every policy you implement has a direct impact on all the services our District provides.

Your agency is specifically directed through your planning rules to take the impacts to our District into account in your analysis presented in the DEIS.

“The development, approval, maintenance, amendment and revision of resource management plans will provide for public involvement and shall be consistent with the principles described in section 202 of the Federal Land Policy and Management Act of 1976. Additionally, the impact on local economies and uses of adjacent or nearby non-Federal lands and on non-public land surface over the federally-owned mineral interests shall be considered.” (43 CFR 1601.0-8)

Section 202 of the Federal Land Policy and Management Act includes the statutory direction for your agency to coordinate “planning” with local governments (43 USC 1712(c)(9)). As a political subdivision of the State of Colorado, the Grand River Hospital District is entitled to coordination with your agency in your planning efforts.

The National Environmental Policy Act (NEPA) (42 USC 4321) and corresponding regulations requires coordination with local governments to “improve and coordinate Federal plans, functions, programs and resources.” The District is entitled to have its policies and economic effects considered and resolved by you prior to the release of the now public DEIS.

Even though the laws and policies that direct your agency to prepare this DEIS require you to do so in coordination with the District, for the purpose of resolving conflicts with our District, to ensure consistency with our policies, and ultimately to ensure that the health and welfare of the public is fully considered in this process, your agency has failed to do so.

As a result, the direct, indirect and cumulative impacts the proposed action will have on our District have not been considered, analyzed so that these impacts can be weighed with the benefits and negative effects of this action. For this reason, a supplemental statement should be prepared taking into account the impact of these proposed conservation measures on the health and welfare of the people of our community in coordination with our District.

This analysis is not something that should be done at a later date when you prepare site specific environmental statements. The policies that will impact our District are being considered now, and will be put into place through this environmental statement. Therefore the harm that will come to the District should be considered in this analysis.

Economic Facts and Impacts You Failed to Consider

In 2012, the Grand River Hospital District received \$15,892,975 in tax revenues attributable to oil and gas production in Garfield County. Land within the jurisdiction of our District had a total assessed value of \$3,211,857,600, of which \$2,839,552,470 was directly attributable to oil and

gas resulting in the percentage of 88.41% or \$15,892,975 of our total District property tax revenues.

This obviously is a major source of our income and any curtailing of oil and gas production in Garfield County will have devastating effects to our District and bring economic destruction to our community and our ability to provide affordable health care.

In fact, revenues to our District, generated by oil and gas production, allowed us to: build the Rifle campus, which includes the hospital, in 2003; build the Medical Office building and conference center in 2009; build our new Medical Office Building currently being constructed in Battlement Mesa; and, create the Occupational Health and Safety Center.

In 2009, Grand River Hospital District attempted to pass a bond issue to build a new care center, but that effort failed. There are plans to go before the voters again in 2017, to attempt to pass another bond issue to build an OB unit, ICU and new care center. Even if the bond issue passes, it would only provide enough revenue for these projects, but only if there is continued oil and gas production activity in the region.

Without that production, any future growth of our medical campus and services available for our community in western Garfield County will greatly depend upon the continued production of oil and gas in our County.

If our budget is diminished as a result of the greater sage-grouse conservation measures, not only will the grouse be harmed, but the people and our District will be irreversibly harmed as well. No consideration of this impact was discussed in the DEIS. No discussion was made with us as to how you will resolve this conflict. None of this harm has been brought to the attention of the public or decision makers making the DEIS incomplete and fatally flawed.

A supplemental statement should be prepared to fully analyze the impact of the action alternatives on the financial resources of our District and how this will jeopardize the health and welfare of our patients and our citizens.

Failure to Consider Reasonable Alternative:

Earlier this year, Garfield County adopted the Garfield County Greater Sage-Grouse Conservation Plan. This plan was developed to ensure the conservation measures implemented were appropriate for the unique landscape and culture of the county, which is unlike any other habitat in the 11 state ranges of the grouse. The county also developed this plan so that there would be coordination among all of the agencies and governments with jurisdictional responsibilities for the habitat and the species. This includes coordination with our District.

NEPA regulations require your agency to "study, develop and describe alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources." (40 CFR 1507.2) It is concerning to us that after reviewing the Garfield County Plan, it was not carried forward as a reasonable alternative for the lands within the jurisdictional boundaries of Garfield County.

The plan, properly compared with the other alternatives, provides the most protection to the greater sage-grouse, while also ensuring the productive use of the land will continue. Under the Garfield County Plan, our District could continue to operate from current funds derived from oil and gas exploration and production well into the future and continue to ensure our patient's health needs, as well as, protect the greater sage-grouse. This plan demonstrates that the grouse and the people can be fully protected without sacrificing human needs and protection. It should have been fully considered and not summarily dismissed.

Rigorous analysis and comparison of the Garfield County plan would have helped to sharply define the issues, "providing a clear basis of choice among options by the decision makers and the public," (40 CFR 1502.14) as required under the NEPA rules. This currently does not exist in the comparison of alternatives carried forward. The action alternatives (B-D) vary only slightly from each other.

They are all a variation of the NTT approach mandated to be included by the Secretary of Interior as the policies preferred. Alternative B is the NTT alternative where these conservation measures are specifically carried forward. Alternative C is a more restrictive version of these same NTT policies. Alternative D is a slightly less restrictive alternative based on the same NTT principles.

There are no sharply defining issues that show clear distinctions between the three action alternatives. They all carry forward the NTT approach in some fashion. Only the Garfield County Plan offers any distinction in how to develop and implement conservation measures for the protection of the grouse.

However, you failed to analyze or consider this reasonable and preferable alternative.

Summary

For this reason, as well as, the others stated above, a supplemental statement should be prepared to properly consider the local impact of the proposed action on the human and natural environment. This supplemental statement should be prepared in coordination with our District for the purpose of resolving the conflicts with our policies and to ensure all reasonable alternatives are considered, which would include a rigorous analysis of the Garfield County Greater Sage-Grouse Conservation Plan.

If implemented, the proposed action would represent a violation of BLM's multiple use mandate and a violation of the public trust in that agency to protect human life and property as its first priority.

In addition, the exclusion of coordinating with the Grand River Hospital District and not even considering the restrictions your actions will place on our ability to provide adequate and quality health needs of our citizenry is inconceivable and inexcusable.



Just as it is the BLM's mission to "sustain the health, diversity, and productivity of America's public lands for the use and enjoyment of present and future generations," it is our mission to provide the best healthcare for our citizens at the most reasonable and efficient cost possible.

Your failure to coordinate your DEIS with our District has placed us in a very difficult and dangerous situation should you not consider our needs. We implore the BLM to delay approval of the proposed action and instead prepare a supplemental statement which takes these concerns into account.

These comments are only a summary of our concerns and not a complete analysis of the conflicts we find in the DEIS. Also, please include as a part of our comments those submitted by the Garfield County Board of Commissioners.

Sincerely,

A handwritten signature in blue ink, appearing to read "James C. Coombs, Jr.", written in a cursive style.

James C. Coombs, Jr.
Chief Executive Officer

