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July 31, 2019

By Email Matt.S.Gilman@dhsosha.state.or.us

Matt Gilman
Facilities Planning & Safety Program Manager
Oregon Health Authority
Public Health Division

Re: NEWCO Oregon Inc.'s CON Application - Wilsonville

Dear Matt:

As you are aware, this office represents Willamette Valley Medical Center in McMinnville ("WVMC") with regard to the Certificate of Need Application referenced above.

WVMC hereby requests that it be given "affected party" status in this application process, as follows:

WVMC's Interest in the Outcome of the Proceeding

WVMC provides a specialized geropsychiatric program to senior citizens that focuses on the unique physical and emotional needs of senior adults, a program that has treated hundreds of patients over the course of the past five years. Although WVMC is located in Yamhill County, south of the proposed NEWCO facility, the distance between the two facilities is less than 27 miles, and WVMC has drawn approximately 7% of the population of its specialized program from Washington County, the targeted service area of NEWCO proposal. The premise of NEWCO's market analysis defining Washington County as its market, moreover, ignores that it is twice as far from the proposed location in Sherwood to northern Washington County than it is to WVMC's facility in McMinnville. As such, the NEWCO facility clearly may impact WVMC's existing psychiatric program, which gives WVMC an interest in the outcome of this proceeding under the standards of OAR 333-545-0020(4).

Why Existing Parties to the Proceeding Cannot Adequately Represent WVMC's Interest

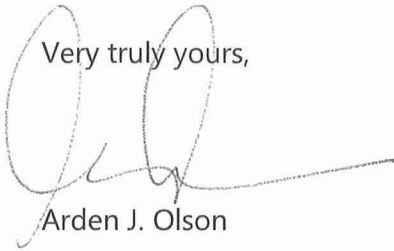
NEWCO has no interest in or apparently concern for its impact on WVMC's program. The application makes no mention of Yamhill County, although the proposed facility would be located little more than 10 miles from the county line. There are currently no other parties in the

Matt Gilman
July 31, 2019
Page 2

proceeding. Although we notice that the local chapter of the National Alliance on Mental Health has applied for "affected party" status claiming a public interest, nothing that NAMI articulates as its interests would protect those of WVMC, even assuming that its petition is granted.

Please grant WVMC affected party status. If you have questions about this request, please let us know what more information you need to demonstrate WVMC's entitlement to participate in this proceeding.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Arden J. Olson', with a long horizontal flourish extending to the right.

Arden J. Olson