

**Constantino, Mike**

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**From:** Avery, Courtney  
**Sent:** Monday, June 20, 2011 2:04 PM  
**To:** Constantino, Mike  
**Subject:** FW: Shared File: Loyd\_Letter\_To\_Review\_Board\_re\_Woodlawn\_Dialysis\_Center.pdf

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**From:** Bernard Loyd [mailto:bloyd@me.com]  
**Sent:** Monday, June 20, 2011 1:30 PM  
**To:** Avery, Courtney  
**Subject:** Shared File: Loyd\_Letter\_To\_Review\_Board\_re\_Woodlawn\_Dialysis\_Center.pdf

You can download "Loyd\_Letter\_To\_Review\_Board\_re\_Woodlawn\_Dialysis\_Center.pdf" using this link:

<https://files.me.com/bloyd/lwzu1g>

Sent from my mobile device - pls forgive typos

Bernard Loyd  
4245 S. Dr. Martin Luther King, Jr. Drive  
Chicago, Illinois 60653

June 19, 2011

Illinois Health Facilities and Services Review Board  
525 W. Jefferson Street  
Springfield, Illinois 62761

Re: Proposed Woodlawn Dialysis Project #10-093

Review Board Members:

I write as a resident of the Bronzeville community to articulate strong community opposition to the proposed Woodlawn Dialysis Project at 5038 South Dr. Martin Luther King, Jr. Drive (51st Street & King Drive) in Chicago, Illinois and to communicate my dismay at what appears to be a deliberate effort to avoid substantive community input into the decision process. This project could have serious negative impact on the further development of the Bronzeville Community. Consequently, I request that the Board provide the opportunity for community input, and, in particular, require a Public Hearing on the Project.

This letter also is in support of the State Agency's finding that the proposed Project does not appear to be in conformance with the provisions of Part 1110.

### **1. Strong Community Opposition to Project**

Despite very limited opportunity to review and assess this Project, community and business leaders have articulated strong opposition to the proposed Project:

- Community leaders were informed of the proposed Project on 6/5/11.
- Leaders of the 51st Street Business Association and of the Bronzeville Alliance Retail Initiative indicated their opposition to the proposal on 6/6/11 and 6/7/11.
- The 51st Street Business Association voted unanimously in opposition of the proposed location of the Project on 6/14/11.
- A cross-section of key Bronzeville civic leaders (including leaders of Bronzeville Alliance, 51st Street Business Association, Concerned Citizens of Bronzeville, Bronzeville Chamber of Commerce, and Bronzeville Visitor

Information Center) voted unanimously in opposition of the proposed location of the Project on 6/18/11.

The reasons for the strong opposition are that the proposed project neither respects the intended retail nature of the 51st Street Corridor nor honors the historic nature and character of the residential King Drive boulevard.

At the same time, community leaders recognized the potential value of an End Stage Renal Dialysis facility in the community and offered two sets of alternatives that could significantly reduce the cost and enhance the value of the Project to the community. First, we proposed a partnership between the ESRD facility and the existing Provident Hospital, which is located approximately one block from the proposed location and whose leaders have indicated that they have both capacity and significant interest in such an arrangement. Second, we indicated our willingness to explore development options at the proposed location that would mitigate the negative impact of the ESRD facility by increasing and making more prominent retail features of the Project.

## 2. Lack of Opportunity for Community Input into Decision Process

The Bronzeville community has been afforded no opportunity to provide substantive input to the decision process within the stated timeframe of the Illinois Health Facilities and Services Review Board (per <http://www.idph.state.il.us/about/hfpb/hearingopps.htm#10-093>), in bold below:

<b>Date</b>	<b>IDPH Milestone</b>	<b>Comment</b>
<b>1/4/11</b>	<b>Application declared complete</b>	No information provided to community
<b>3/25/11</b>	<b>Application modified to change site</b>	No information provided to community
<b>4/15/11</b>	<b>Deadline for requests for Public Hearing</b>	No information provided to community
<b>5/24/11</b>	<b>Review of modification scheduled for completion</b>	No information provided to community
<b>6/5/11</b>	<b>Community leaders informed of Project by Alderman</b>	No information provided to community regarding public process timeline
<b>6/8/11</b>	<b>Written comments due</b>	No information provided to community regarding public process timeline
<b>6/14/11</b>	<b>IDPH posts findings in State Agency Report</b>	No information provided to community regarding public process timeline

Date	IDPH Milestone	Comment
6/18/11	Applicant provides community leaders overview of Project	No information provided to community regarding public process timeline
9AM, 6/20/11	Deadline for submitting responses to Agency Report	

In short, Applicant provided information about the Project to community leaders on a Saturday morning, June 18, 2011, more than two months after the deadline for requests for public hearing, ten days after the deadline for written comments, and less than 48 hours before the deadline for submitting responses to the Agency Report.

Moreover, even then, and despite claiming to be “community-centric”, Applicant did not notify community leaders of the impending deadline for submitting responses to Agency Report. Instead, community leaders discovered this at the proverbial 11th hour through research of our own.

### 3. Concurrence with State Agency’s finding

I concur that the proposed project does not appear to be in conformance with the provisions of Part 1110. According to Table Four in the Agency Report, the majority of the 44 End Stage Renal Dialysis facilities within a 30-minute drive radius are operating below the 80% utilization goal.

For example, FMC Prairie, located 5.4 minutes from the current location, has 24 stations and utilization of 71.5%; and, DSI Loop Renal Center, located just 6.3 minutes away, has 28 stations and capacity utilization of just 42.8%.

Further analysis of Table Four indicates that these 44 ESRD facilities provide 923 dialysis stations in total. Elimination of the 20 stations at the current 55th Street location would increase aggregate utilization by just 2.2%. Consequently, the Project appears to create unnecessary duplication/maldistribution of service (1110.1430(b)) and a further and unnecessary strain on State finances.

Moreover, the Applicant does not appear to have explored alternative options that could be more effective or less costly for meeting the health care needs of the population served. Community leaders have held preliminary discussions with the leaders of Provident Hospital, which is located approximately one block west of the proposed location.

These discussions indicate that Provident has both capacity and significant interest in a partnership with an ESRD facility. Such a partnership could go a long way towards improving utilization of Provident’s facilities and avoiding the high cost of ground-up

construction and of low system-wide capacity utilization. This cost would be passed along to patients, and, ultimately, to the State.

\* \* \*

Due to the potential of serious negative impact on the Bronzeville community, the lack of appropriate community notification/engagement by the Applicant, and the lack of conformance with the provisions of Part 1110, I request that the Board provide members of the Bronzeville community the opportunity through July 30, 2011 to provide written input and that the Project be reassessed with consideration of this input.

I also request that the Board require Applicant to work with community leaders to organize and communicate broadly a Public Hearing on the project that would take place on or before July 15th.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul J. Boyd". The signature is fluid and cursive, with the first name "Paul" being the most prominent.

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