

**FACSIMILE**

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No. of Pages: 11  
(including cover)

TO: Mr. Michael Constantino  
Ms. Courtney Avery  
FROM: Phillip Kambic, CEO  
Pamela Hull, Assistant to the President  
RIVERSIDE HEALTHCARE  
Voice Tel. No. 815/935-7549  
Fax Number: 815/935-7823

**MESSAGE:**

Project 12-089 Riverside Medical Ctr.  
response to public comment.

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Thank you for your cooperation.



350 N. Wall Street  
Kankakee, IL 60901  
815-933-1671

**VIA Email and Facsimile**

January 16, 2013

Mr. Michael Constantino  
Supervisor, Project Review Section  
Illinois Health Facilities and Services  
Review Board  
525 West Jefferson Street  
2nd Floor  
Springfield, IL 62761

**Re: Project 12-089 Riverside Medical Center North Campus at Frankfort, Frankfort  
Riverside Medical Center's Response to Public Comment**

Dear Mr. Constantino:

On behalf of the applicant Riverside Medical Center, I am submitting this letter and enclosures in response to public comment received on this project at the public hearing held in Frankfort on January 10, 2013.

Riverside's proposal is to establish a free-standing emergency center ("FEC") with medical offices and diagnostic services at Route 45 and Steger Road in southern Will County. By way of background, Riverside is a regional health system based in Kankakee, Illinois. Riverside has been nationally recognized for the quality of health care we deliver. We are a Teaching Hospital as well as a Nursing Magnet hospital. We have established health care facilities in four surrounding counties: Kankakee, Iroquois, Grundy, and Will counties (Attachment 1).

Riverside has a long history of providing outpatient, community-based health care services. In particular, we established our first community-based health center over twenty years ago in Will County. On the attached map (Attachment 1) are the many locations that we have established in order to provide a widely-distributed health care network. These services provide more accessible and less costly care closer to the patients we serve.

In 2004, Riverside purchased land at Rt. 45 and Steger Rd. Since that time, we have worked hard to determine exactly what services would best meet the needs of the community and the region. In addition to working with the Village of Frankfort, we conducted market research and held focus groups to give us an accurate picture of what services were needed. Based on that input, Emergency Care services and access to more physicians were identified as the most

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significant needs in the region. We have proposed an Emergency Care Center that will include medical offices and diagnostic services.

We have no intention of building an inpatient hospital at this location. There is a significant trend away from inpatient services. Riverside's experience in successfully developing and delivering outpatient services will be applied to this proposed project.

**A. The Proposed Facility Will Primarily Serve Southern Will County and Northern Kankakee County**

Hospitals located in Joliet (northern Will County) and Cook County has objected to Riverside's project on the grounds that the "southwestern suburbs" are adequately served by existing facilities. As noted in our application and public hearing testimony, the service area for the proposed project targets southern Will County and northern Kankakee County. Between Joliet, in northwestern Will County and the City of Kankakee, in south-central Kankakee County, there are no emergency services.

Riverside has existing outpatient centers within this area including one urgent care center in Monee located in southeastern Will County. Riverside also has outpatient centers in Manhattan, Peotone, and Wilmington, all in southern Will County, as well as Manteno and Bourbonnais in northern Kankakee County. Riverside is currently serving these area communities and the proposed FEC in Frankfort will be available to these residents. These are not "southwest suburbs" of Chicago and are not in Cook County. They would all be considered rural areas of Illinois, and 60% of the proposed service area consists of rural areas.

Objecting hospitals from Joliet and from Cook County facilities assert that they have excess capacity in their emergency departments. However, these facilities are not readily accessible to residents of southern Will County and northern Kankakee County while Riverside's proposed facility is ideally located to provide access to emergency services for this population.

**B. Noise and Traffic Concerns Raised by Local Residents**

At the public hearing, four local residents appeared and gave oral testimony to express concerns about traffic and noise. (There were also Frankfort residents who appeared in support of this project.) One of the concerns related to helicopter traffic. As noted at the public hearing by Kevin J. Hack, Director of Ambulance/ EMS System, in calendar year 2012 there was only one helicopter transport from all of the Illinois free-standing emergency centers. Thus, the average helicopter transports from an Illinois FEC is far less than one per year. Helicopter traffic is simply not an issue.

Another concern raised by the local residents related to increased traffic. Riverside met with the Illinois Department of Transportation (IDOT) regarding this proposed project in the summer of 2012 and commissioned a traffic study in response to an IDOT request. The traffic consultants concluded that the existing roadway system has sufficient reserve capacity to accommodate additional traffic that would be generated by the proposed FEC, and that no additional external roadway improvements would be required to accommodate the development-

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generated traffic. The traffic study further concluded that the proposed project will not have a negative impact on traffic, that safe and efficient access to the facility is available and that the access and circulation system will provide safe and efficient access to and from the site with minimal interruption to the thru traffic.

The location for the center is already on a well traveled route and the services would have a minimal impact on the traffic flow. LaGrange Road is a major thoroughfare with existing ambulance activity occurring on this access way. In addition, the project plans include a generous set back from the road with effective design and landscaping to minimize concerns of noise. The facility will be built on a 26-acre site owned by Riverside and will be situated so as not to abut any residential properties.

We note that the proposed facility will be located directly across from farmland and that most of the area south of the facility is farmland (Attachment 2). Also, in connection with the noise issue, we respectfully note that directly across LaGrange Road from the proposed site is a concert/party venue that hosts outdoor rock concerts from May through September in addition to wedding receptions, alumni parties and other large gatherings throughout the year.

Riverside is sensitive to concerns raised by community residents. As an organization, Riverside has always worked hard to be a good community partner in all of the more than a dozen locations where we have facilities. On the very limited occasions where an issue has come up any one of our facilities from neighboring residents, we have worked quickly and cooperatively to solve those issues. In addition, Riverside has been and will continue to be a good business neighbor in the communities which it serves in which it has facilities and it will continue that tradition of being a supportive community partner.

Riverside is respectful of the concerns raised by those who reside in the vicinity of the proposed project, and we have committed to work with local residents to address their concerns. As noted above, only four local residents presented oral testimony in opposition the project at the public hearing. We have been told that the Review Board has received a several identical form letters that express opposition to the project. The form letters themselves appear to be the handiwork of an organized, professional public relations campaign of the type that has become all too common on contested CON applications. We could not help but notice that the form letters submitted on our project have the same font and the same formatting as and even identical language to the form letters that are inundating the file of another project for Lake County, Illinois that is pending before the Review Board. (See Attachment 3 and Attachment 4 form letter on Riverside's Project No. 12-089 and the Lindenhurst Project No. 12-081.) I reiterate Riverside's strong commitment to addressing the legitimate concerns of the local residents. We are disappointed however to be the object of a manufactured "grassroots" campaign of the type that can now be generated at will upon payment of the right professional fee.

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**C. The Proposed FEC is Needed**

With the passage of the Affordable Care Act, approximately one million more people in the State of Illinois will have insurance, but unfortunately they will have limited access to an already over-burdened primary care system. This trend is predicted to increase the demand for ED services throughout the country. Our free-standing emergency department will be open 24/7 and be available to any and all people who need care.

In addition to impact of the Affordable Care Act, our research indicates that there will be a significant need for this facility as a result of the rapidly-expanding senior population and the projected census growth in the surrounding communities. Our research also shows that this project and its target service area will have little impact on any of the other Emergency Departments in the surrounding region (Attachment 5).

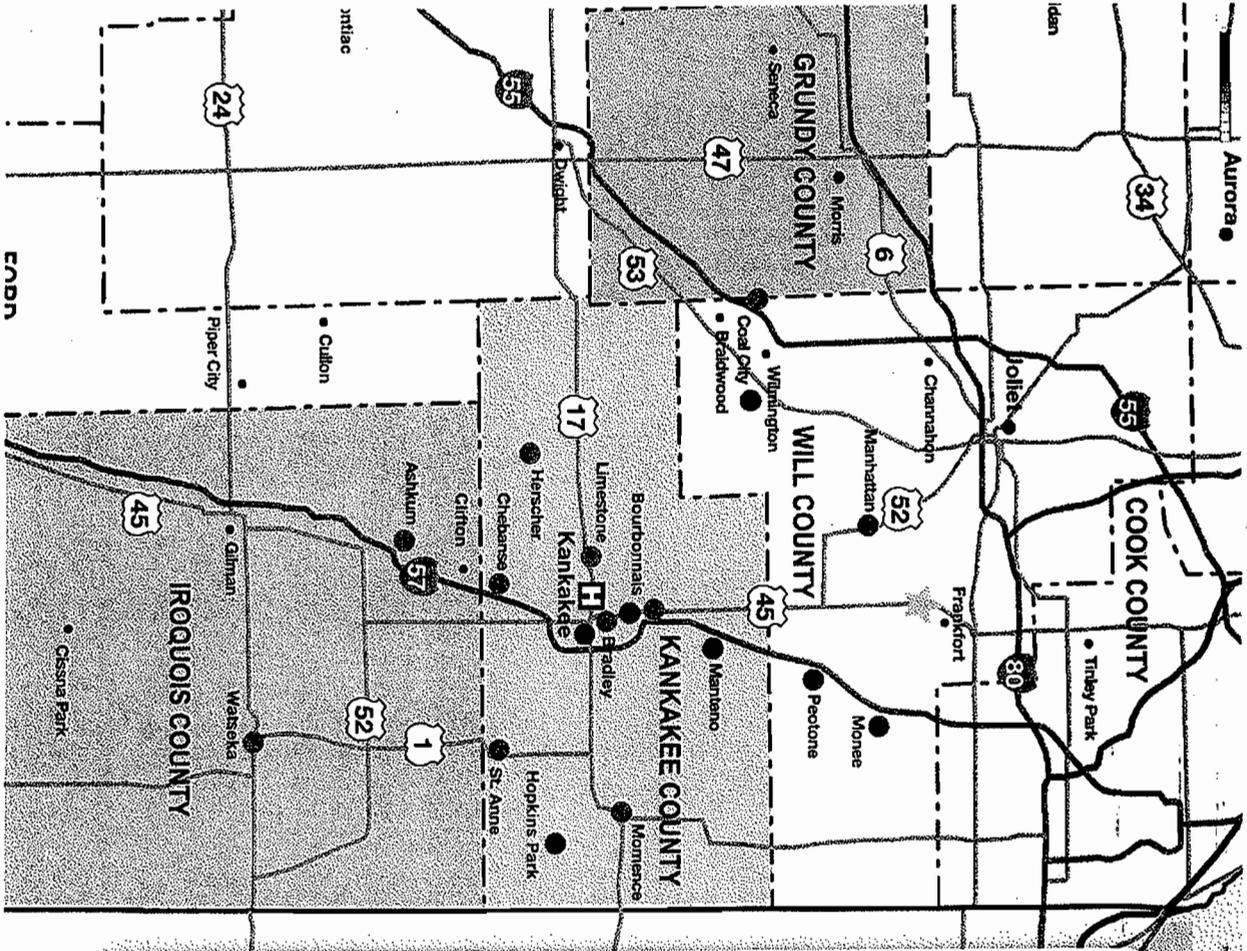
While there are other facilities within 30 minutes to our proposed site, these facilities are not readily accessible by residents of southern Will County and northern Kankakee County. The proposed facility will dramatically reduce travel times for residents of these areas in need of emergency services. For example, Manhattan travel times would be reduced to 11 minutes, which is less than half of the average travel time for residents seeking emergency care to existing facilities (Attachment 6).

In conclusion, on behalf of Riverside Medical Center, I respectfully request that the Health Facilities Planning Board approve Riverside's application for a Free-Standing Emergency Center.

Sincerely,



Phillip M. Kambic  
President and CEO





# RIVERSIDE

## Medical Center

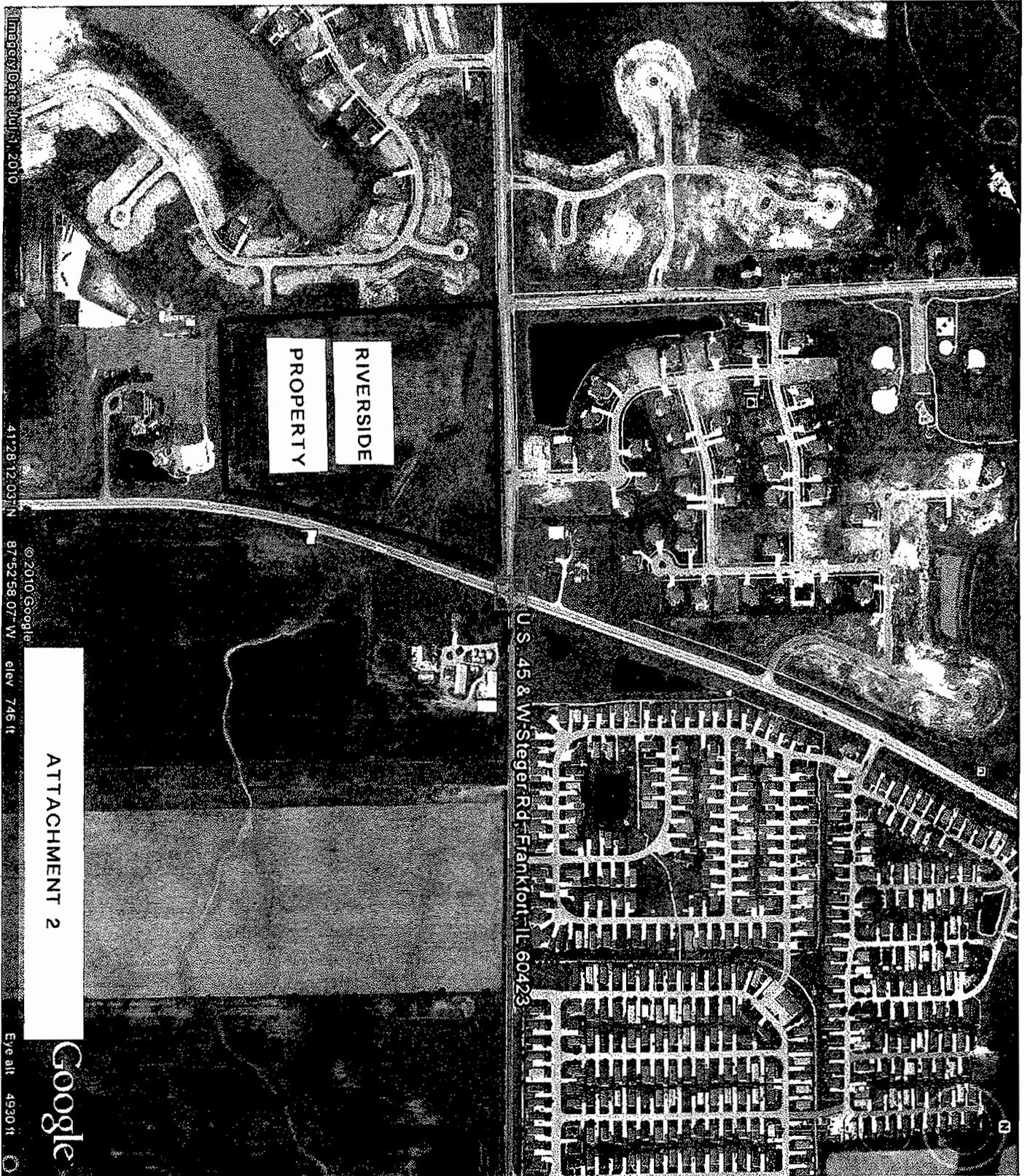
<b>Outpatient Centers</b>	
● Bourbonnais	● Monee
● Kankakee East Court	● Pembroke
● Manhattan	● Peotone
● Manteno	● Wilmington

<b>Ambulance Stations</b>	
● Ashkum	● Herscher
● Bradley	● Momence
● Chebanse	● St. Anne
● Limestone	

<b>Ambulatory Care Centers</b>	
● Bourbonnais Campus	
● Coal City Campus	
● Watseka Campus	

<b>[H]</b> Riverside Medical Center and Senior Living Campus
<b>[★]</b> Proposed Frankfort Facility





RIVERSIDE  
PROPERTY

ATTACHMENT 2

Image Date: Jul 31, 2010

41°28'12.03"N

© 2010 Google

87°52'58.07"W

elev 746 ft

Eye alt 4930 ft  
Google

Mike Constantino, Chairman  
Illinois Health Facilities and Services Review Board  
525 West Jefferson, 2<sup>nd</sup> Floor  
Springfield, IL 62751

**RECEIVED**  
JAN 03 2013  
HEALTH FACILITIES &  
SERVICES REVIEW BOARD

RE: Letter of Opposition, Project #12-089, Riverside Medical Center-Frankfort

Dear Mr. Constantino,

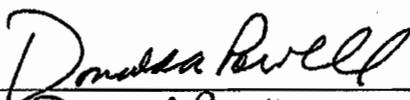
I am writing to oppose the new Riverside Freestanding Emergency Care Facility proposed for Frankfort. As someone who is concerned with preserving both the quality of life as well as the healthcare system in Will County, I believe that an emergency care facility in this location would be both unnecessary and harmful to the community for the following reasons.

Currently, residents of the proposed service area already have access to ten community hospital locations, countless medical office providers, as well as a Freestanding Emergency Care Center in Homer Glen, and urgent care facilities in Orland Park, Tinley Park & Oak Lawn. For most of the proposed service area, the proximity of existing hospital locations and urgent care facilities is much closer and accessible than that of Riverside's proposal. Consequently, I am concerned that this emergency health care facility would duplicate existing services, result in an unnecessary increase in patient transfers, and jeopardize the quality of care to patients in the area. No one is arguing that access to healthcare is a critical matter. However, in time-sensitive medical situations, most county residents are already within 15 minutes of emergency departments.

Furthermore, the location of Riverside's Freestanding Emergency Care Facility is in a highly residential area. Consequently, developing a site in such an area would disrupt the quality of life for thousands of residents subjected to constant siren noise, traffic noise, major road reconstruction, increased road congestion, and diminish home values.

**For these reasons, I strongly oppose this project.** Not only does it fail to provide greater accessibility and proximity of emergency health care services to the majority of the area which is already adequately serviced, but it is also in a completely unsuitable location due to its direct proximity to various residential neighborhoods.

Sincerely,

  
Signature \_\_\_\_\_  
Printed Name Donald A Powell  
Address 11071 VENEZIA DR  
City/State/Zip: FRANKFORT, IL 60423  
Date: 12/31/2012

Mr. Dale Galassie  
Chairman  
Illinois Health Facilities and Services Review Board  
525 West Jefferson, 2nd Floor  
Springfield, Illinois 62761

**RECEIVED**  
NOV 08 2012  
HEALTH FACILITIES &  
SERVICES REVIEW BOARD

**RE: Letter of Opposition, Project # 12-081, Vista Medical Center – Lindenhurst**

Dear Mr. Galassie,

I am writing to **oppose** the new Lindenhurst hospital proposed by Vista Health System. As someone who is concerned with preserving healthcare quality in Lake County, I believe that it is clear that a new hospital here would jeopardize vital services and programs, harming the existing infrastructure at the expense of new and unneeded project.

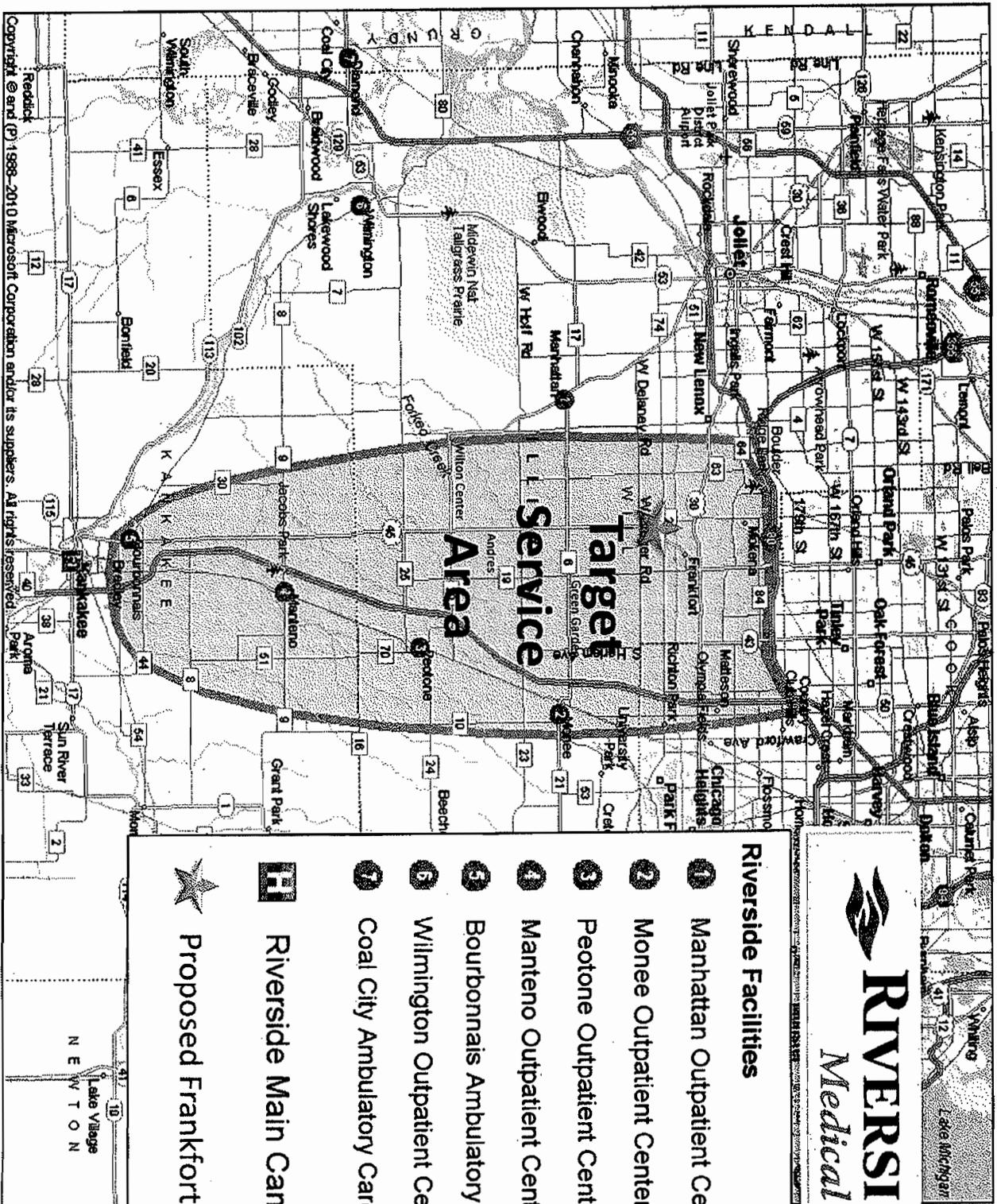
Right now, Lake County has six full-service hospitals. The county is also home to Freestanding Emergency Centers, ambulatory surgery centers and medical office buildings, where physicians see patients close to their homes every day. This is a well-served region—with just enough patients to sustain the major hospitals. Adding another full-service hospital represents an unnecessary and irresponsible expenditure of healthcare dollars.

Further, the proposed project wouldn't provide anywhere near the same level of services as Advocate Condell Medical Center in Libertyville. But it would take away patients, which would hurt other hospitals' abilities to provide excellent healthcare for Lake County.

**I oppose this project for the citizens of Lake County.** We must preserve the critical services and programs that communities deserve. A new and unneeded hospital would upset a fundamental balance, and I ask you to deny it.

Sincerely,

Signature: Mary Jo Suhar  
Printed Name: MARY JO SUHAR  
Address: 163 ZELINGER LN  
City/State/ZIP: AVONDALE, IL 60007  
Date: 6 11-2-2012



**RIVERSIDE**  
Medical Center

**Riverside Facilities**

- ① Manhattan Outpatient Center
  - ② Monee Outpatient Center
  - ③ Peotone Outpatient Center
  - ④ Manteno Outpatient Center
  - ⑤ Bourbonnais Ambulatory Care Campus
  - ⑥ Wilmington Outpatient Center
  - ⑦ Coal City Ambulatory Care Campus
- H** Riverside Main Campus
- ★ Proposed Frankfort Facility

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**RIVERSIDE MEDICAL CENTER**  
**Travel time to communities in proposed service area**

FACILITY	Andres		Manhattan		Mokona		Pentone		Frankfort	
	Miles	MQ Travel Time	Miles	MQ Travel Time	Miles	MQ Travel Time	Miles	MQ Travel Time	Miles	MQ Travel Time
<b>Proposed Riverside ER</b>	6.35	7	8.64	11	4.87	10	15.21	19	2.23	3
Silver Cross Hospital	18.51	26	10.84	18	7.04	15	27.37	38	9.94	17
Franciscan St. James - Olympia Fields	18.68	22	20.97	27	10.73	18	14.10	21	9.16	15
Advocate South Suburban	23.49	29	25.77	33	12.84	18	17.49	28	14.07	20
Silver Cross Freestanding Emergency Department	20.16	32	19.88	31	8.96	17	35.73	45	13.40	22
Franciscan St. James - Chicago Heights	20.74	30	23.02	34	12.25	27	16.19	28	11.88	22
Provena St. Joseph Medical Center	21.77	32	12.78	22	20.15	27	29.15	44	21.39	29
Ingalls Memorial Hospital	25.95	33	28.24	37	15.30	22	26.51	34	16.54	24
Palos Community Hospital	22.05	34	26.87	39	12.27	23	26.52	42	13.54	24
MetroSouth Medical Center	27.60	36	29.89	40	16.90	25	28.16	36	19.75	27
Riverside Medical Center	22.53	28	25.95	37	30.30	45	20.37	27	27.09	38

FACILITY	Manteno		Monroe		Wilton Center		Green Garden	
	Miles	MQ Travel Time	Miles	MQ Travel Time	Miles	MQ Travel Time	Miles	MQ Travel Time
<b>Proposed Riverside ER</b>	13.58	21	11.22	16	11.50	13	0.09	1
Silver Cross Hospital	28.59	40	25.26	32	17.46	25	10.90	18
Franciscan St. James - Olympia Fields	23.14	26	7.99	13	25.59	28	12.26	20
Advocate South Suburban	27.94	33	11.38	19	30.40	35	17.17	25
Silver Cross Freestanding Emergency Department	31.33	47	27.00	37	22.84	37	13.64	25
Franciscan St. James - Chicago Heights	25.10	33	10.70	19	27.55	36	14.98	27
Provena St. Joseph Medical Center	31.45	47	26.16	41	18.67	30	15.14	28
Ingalls Memorial Hospital	30.41	36	17.77	26	32.86	39	19.64	29
Palos Community Hospital	36.13	46	23.50	35	27.23	41	16.64	29
MetroSouth Medical Center	33.75	39	21.00	29	35.74	41	22.84	32
Riverside Medical Center	13.85	20	28.00	35	20.13	30	25.78	37