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HEALTH FACILITIES &  
SERVICES REVIEW BOARD

March 4, 2013

Dale Galassie, Chair  
Illinois Health Facilities and Services Review  
Board  
525 West Jefferson Street, 2nd Floor  
Springfield, Illinois 62761

**Re: Opposition to FMC Streeterville CON Application (Proj. No. 12-093)**

Dear Chairman Galassie:

I am writing to oppose Fresenius Medical Care's (FMC) CON application to establish a 12-station in Chicago's Streeterville neighborhood because there is (i) insufficient need in the immediate area surrounding the proposed site; (ii) the facility will unnecessarily duplicate services; and (iii) as a location for chronic disease management services requiring visits three times a week, Streeterville's location is probably the most inaccessible compared to other locations in the City of Chicago. Providers should expand care access in areas that truly need such services.

It is inappropriate for FMC to add a new facility when there is existing capacity at its other facilities located in such close proximity. Notably, of the 19 facilities within 15 minutes normal travel time, only 3 are operating above the State's 80 percent standard. These facilities are operating at approximately 66% average utilization, as of December 31, 2012. While average utilization is not the only factor that the Board should consider when evaluating the viability of dialysis projects, this particular proposal lacks any compelling justification to ignore reduced utilization in the immediate service area.

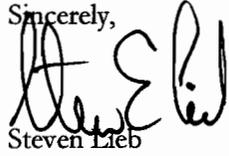
Furthermore, the establishment of a 12-station ESRD facility at the proposed location will place 56 stations within a half mile of each other and even more if the Board approves the pending 36 station NMFF proposal. It is difficult to imagine a situation that results in greater unnecessary duplication of services. Of the facilities within 10 minutes of the proposed site, none are operating at or above the State's 80 percent standard. As such, this facility will unnecessarily duplicate services.

As a location for chronic disease management requiring visits three times a week, a Streeterville location is a poor choice. It is not easily accessible to Chicago residents, is an upscale neighborhood in the Near North Side community area of Chicago, and probably Chicago's most successful urban area. In general, the incidence of treated ESRD is inversely related to income level with incidence being higher in socio-economically disadvantaged communities. Streeterville is bounded by the Chicago River to the south, the Magnificent Mile shopping district to the West, Lake Michigan to the East and North. As over a dozen skyscrapers, including the John Hancock Center and many shopping center/hotel high rises, occupy the neighborhood, the area is congested and parking is difficult and costly. Requiring patients to travel to a congested tourist, business and acute care hospital destination for routine dialysis services suggests that the

facility is being sited at that location based on other undisclosed interests, despite patients being better served outside of the shopping and business district.

There is simply no need for a new facility to be located in the Streeterville community. Thus, we respectfully request that the Board deny this applicant's request for a CON permit.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Lieb", written over the word "Steven Lieb".

Steven Lieb

Vice President, Group Administration  
And Strategy Development