

February 17, 2021

RECEIVED

By CERTIFICATE OF NEED PROGRAM at 2:15 pm, Feb 23, 2021

Eric Hernandez, Program Manager
Certificate of Need Program
Department of Health
PO Box 47852
Olympia, WA 98504-7852

DOR21-28

Dear Mr. Hernandez:

Northwest Kidney Centers ("NKC") is proposing to relocate **NKC Elliott Bay Kidney Center** and requests a determination of non-reviewability (DNR) in accordance with WAC 246-310-050. The relocation is necessary because the existing space in the current clinic at 600 Broadway has outlived its useful life and is in a building where the lease is ending. Key issues: The clinic is located on the second floor of a multi-tenant building and patients with mobility challenges can't make the long distance. Adding to the challenges, the City of Seattle removed the patient loading/drop off area to create a bike lane and forcing patients to walk further. In creating a new NKC Seattle Kidney Center, NKC has the opportunity to create a state-of-the-art new treatment facility and bring great value to the patients in this planning area.

We believe the proposed relocation satisfies the criteria in WAC 246-310-830(4) and is therefore not the establishment of a new health care facility and not subject to Certificate of Need review. We have had a consult call with Karen on this project (February 9th, 2021) and this submission is a follow-up to that phone call.

The existing NKC Elliott Bay Kidney Center is located at:
NKC Elliott Bay Kidney Center
600 Broadway,
Seattle, WA 98122

The proposed new facility will be located at:
NKC Seattle Kidney Center (new location)
Zip code 98104 - Address not yet known as this is raw land but resides at the cross street of Alder Street and 8th Avenue in Seattle – across the street from UW/Harborview Regional Burn Center. Area historically known as "Yesler Terrace" legal description:

"LOT 1 IN BLOCK 7 OF YESLER TERRACE COMMUNITY, ACCORDING TO THE PLAT THEREOF RECORDED IN VOLUME 267 OF PLATS, PAGES 59 THROUGH 75, IN KING COUNTY, WASHINGTON"

The existing NKC Elliott Bay Kidney Center has a total of 14 in center stations. The proposed new “NKC Seattle Kidney Center” (0.5 miles away) will have space established to support 7 of the 14 stations with the remaining 7 stations to be moved to our existing NKC Rainier Beach Kidney Center with the Rainier Beach transferred stations captured within a separate Certificate of Need application (to be filed in cycle 1 of 2021). Upon NKC Seattle Kidney Center’s (new) project completion we will provide Home Peritoneal & Home Hemodialysis Training, CKD education for outreach to the community, a state-of-the-art water system, power generator during storms and enhanced natural light and views for the patients/staff.

Upon approval and based on estimates of timing on construction of the new center (green field project – raw land development), we estimate that the new NKC Seattle Kidney Center would be operational by February 2024 with this clinics patients and staff moving in March 2024 to the new site.

Table 1

NKC Elliott Bay Kidney Center estimated Timeline	
Event	Est. Completed - Month/Year
DNR approved	April 2021
Design Complete	December 2021
Design review and permitting (City of Seattle)	October 2022
Construction Commenced	November 2022
Construction Completed	November 2023
New NKC Seattle Kidney Center is Operational	February 2024
Staff and Patients move to new center	March 2024

Source: Applicant

The proposed project is relocating the entire NKC Elliott Bay Kidney Center within King Two ESRD Planning Area, and meets the following conditions:

- (a) (a) The existing kidney dialysis facility ceases operation after the relocation;
- (b) (b) No new stations are added to the replacement kidney dialysis facility. The maximum treatment floor area square footage as defined in WAC 246-310-800 (11)(a) is limited to the number of certificate of need stations that were approved at the existing facility;
- (c) (c) There is no break in service between the closure of the existing kidney dialysis facility and the operation of the replacement facility;
- (d) (d) The existing facility has been in operation for at least five years at its present location; and
- (e) (e) The existing kidney dialysis facility has not been purchased, sold, or leased within the past five years.

Based on the foregoing, we seek confirmation the proposed relocation satisfies the criteria in WAC 246-310-830(4) and does not require Certificate of Need review (for these 7 relocating stations).

Enclosed is a check in the amount \$1,925 as payment of the Determination of Non-reviewability fee required under WAC 246-310-990.

Thank you,



Austin Ross
Vice President of Planning
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