

**BEVERLEY G. O'REILLY**

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August 28, 2018

Massachusetts Department of Public Health  
Determination of Need Program  
250 Washington St., 6<sup>th</sup> floor  
Boston, MA 02108

RE: Application of Medford Surgical Center, LCC

Dear Sir/Madam:

Thank you for the opportunity to submit a statement regarding the application of Medford Surgery Center, LLC.

For many reasons, I am opposed to the proposal for a new facility at 170 Governors Ave in Medford. These reasons include, but are not limited to:

- Lack of Need. There is no need for an ambulatory surgery center in Medford. There are several ambulatory surgery centers in Greater Boston. Two are located nearby in Winchester (less than one mile away) and Stoneham (approximately two miles away). It simply does not make sense to build yet another center in such close proximity. Additionally, the types of services offered at ambulatory surgery centers are not every-day services so would be used infrequently at best by the Medford community and neighborhood residents.
- Neighborhood Priority. The priorities of the community and neighborhood residents are for everyday health care: primary care physicians, emergency room services, overnight stays as necessary. None of these services are currently available at the Medford site; in fact, these services have been *stripped* from the hospital. As a neighborhood resident, I can tell you that my family has utilized the emergency room and overnight stay services when needed. These kinds of services are more frequently in need than outpatient day surgeries. It's unfortunate that these services are being removed in favor of profitable services that are not needed regularly. This was not the intention of the Lawrence family when donating the land and funding for the hospital to be built back in 1924.

- For-Profit v. Non-Profit Services. While the hospital seeks to make a profit after having saddled the existing facility with the debt of another community's failed facility, the for-profit services being offered do not justify or offset the removal of the services that were pulled from the hospital and relocated to another community. It is unreasonable and not fair to the local community and residents whose everyday needs will no longer be met at our local hospital and who yet would have to abide by the new facility's growth and services that serve a population that is not necessarily our own community. Again, when the land and funding was donated in the early 20<sup>th</sup> century for the construction of a hospital, it was meant to be a hospital serving the local community, not a for profit outpatient surgical center.
- Lack of Clear Communication-Use of Existing Facility. Upon request at a Community Meeting in which neighbors and abutting owners were notified just one week prior, the hospital has evaded and not thoroughly communicated its intentions to the local community. While it has presented the changing landscape of healthcare and its plans to build this new profitable surgical center, the hospital has refused to answer questions as to how or whether non-profit services that are needed regularly by neighborhood residents and were eliminated from the existing facility will be returned in the future.

The hospital has also not answered questions in regards to what kinds of services would be available in the existing facility in the future, or if the existing facility is even expected to be used in the future. Hospital personnel did acknowledge that the cost to retrofit the existing facility would be an additional \$3m, approximately 20% over the cost of building a new facility. While 20% is significant, it is minimized by the for-profit services that would be rendered and favored by residents who must otherwise endure the construction and blight of a new commercial building.

Certainly residents in the community would like to exhaust all options of repurposing and utilizing the existing facility before constructing a new building on a small site which will significantly alter the physical landscape of our otherwise residential neighborhood, compromise the structural foundations of our homes with disruptive demolition in order to breach significant ledge in the area where the new facility is being proposed, and create considerable traffic and parking impediments where there is no available public transportation. **For these reasons, and at the very least, the hospital should consider retrofitting the existing building which is not in use and for which no plans have been shared with the community.**

- Effect on Neighboring Residents. Neighborhood residents, and in particular abutting residents, will be greatly affected by the following:
  - The demolition of *significant* ledge on the premises in order to build a new facility jeopardizes our private homes which are at risk of serious damage to foundations;

- The property to be developed lacks sufficient (any!) parking for employees and patients alike post-construction and the hospital has not communicated any plan for a parking garage, nor has a survey even been engaged;
- No traffic study has been engaged, where many one-way streets already redirect traffic at peak hours of the day and increased traffic to the residential neighborhood would increase traffic considerably;
- The noise factor from construction and ongoing noise from generators post-construction impacts residents' right to enjoy their personal property;
- Concern for our children's safety in walking to and from their school buses to their homes when significant additional transients will be traveling through the neighborhood;
- The impact upon the ecology and wildlife at the otherwise quiet Middlesex Fells, for which many residents purposely moved to this neighborhood to enjoy; and
- The adverse effect on property values as the result of further *business*-related development in a "sleeper" residential neighborhood abutting 2,200 acres of preserved land.

Lastly, rumors persist that the hospital plans to move a psychiatric facility from another community to the Medford facility, and/or provided expanded mental health services in Medford. Neighborhood residents have expressed significant concerns about this, where the Medford site is in a densely populated residential neighborhood with no public transportation available. Families do not want to worry about their children being at risk by psychiatric patients, substance abuse patients, or any behavioral health patients. As mentioned earlier, hospital personnel have not responded to the community's questions about their plans for the existing building. It's hard to believe that hospital officials do not have a 5-year plan so residents question the need for secrecy, only identifying the proposal for a new building without addressing the future use of the existing building or parking needs for its new facility.

I respectfully request that the Department of Health reject or at the very least delay approval of this project until these concerns are properly addressed.

Sincerely,

