

August 28, 2018

Massachusetts Department of Public Health
Determination of Need Program
250 Washington Street
Sixth Floor
Boston, MA 02108

Re: Melrose Wakefield Healthcare (Wellforce)
Determination of Need proposal for an Ambulatory Surgery Center
Governors Avenue, Medford, MA 02155

Attention Program Members ~

I would like to respond to the aforementioned in the following way.

I shall break down my comments into four categories as to issues and my comments resulting from meetings of August 15 and August 22, 2018.

(1) Location ...

Proponents stated that the proposed location for the Ambulatory Surgery Center to be noted as the (ASC) was incredible for what they wanted to do. They could service, Medford, Malden, Melrose, Stoneham, Everett, Arlington, Winchester and Somerville. My response is that Medford will become the poster child for a multi-community financial windfall for the Melrose Wakefield Healthcare (Wellforce) medical operation. The question I asked is what benefit Medford derives from this?

- It would create significant daily traffic to our residential neighborhoods while removing what valuable parking would be available if this 17,240 s/f building is allowed. The loss of such parking would cause safety problems due to forced parking on Governors Avenue, Forest Street, Winthrop Street, Lawrence Street and all the side street running off these streets that are immediate to the at-present Lawrence Memorial Hospital location.
- They said they looked at three other locations but did not say where they were and why they were not chosen.

(2) Medical ...

- What are all the services that the hospital will be giving up as compared to the services they intend to provide,
- Proponents did not comment on any medical services being offered on a 24 hour basis,
- It was stated by neighbors that there were at least four immediate area hospitals that offered ambulatory surgical care,

- The proponent was asked whether there will be increased on-site psychiatric care providing for in-patient and outpatient services and if so how does that affect the security and safety of our residential neighborhood (no confirmation or rejection was acknowledged)
- The proponent alleged that medical costs for making this change to ASC will reduce medical costs by 25 to 50 %. They never explained what services were to be affected exactly.
- They did not address the future use of Urgent Care or the emergency room as a staple that presently exist at the Lawrence Memorial.
- They did not address with any assurances the positioning (locations) of behavioral health, psychiatric and pediatric inpatient and outpatient services. This was a major concern to many residents.
- There was no mention of the future use of the school of nursing.

(3) On-Site ...

- It was suggested that the proposed surgical center be placed on top of the empty, fourth floor of the onsite building. There was no discussion nor cost analysis to this proposal.
- Additional noise is an issue as the result of increased generators and other mechanical equipment including new door entrance/exit locations along with outside lighting,
- Concern over the removal of green space and mature trees and foliage in order to build the proposed ASC building abutting Department of Conservation and Recreation property,
- Concern about future plans to add yet more facilities, in particular a parking garage which will impact the aesthetics of our neighborhood ever more and
- Concern about potential blasting that would present potential damages to immediate abutter foundations.

(4) Ending ...

- There was no response to the \$12 million debt of the former Malden Hospital being part of Melrose Wakefield Healthcare (Wellforce) debt obligation.
- The Lawrence Memorial Hospital was in a \$30 million surplus position when acquired by Hallmark but due the CEO of Melrose Wakefield Hospital, Michael Sack, such surplus and many daily programs were transferred to the Melrose Wakefield Hospital to the demise of the Lawrence Memorial Hospital.
- It was disclosed at the end of the 8-22-2018 meeting by some neighbors that Wellforce people were going (or already have) to petition the MBTA for a bus route through the Lawrence Estates for patients to get to the proposed ASC location.

Reviewing the aforementioned and comparing the medical pros as to the neighborhood concerns presents delicate considerations. Knowing that the then Melrose-Wakefield Hospital (2012,2013,2014) under the egis of Hallmark Health, led by then CFO Michael Sack followed by Alan McDonald, diverted all its' energy to making the Melrose-Wakefield Hospital a much more premiere hospital than that of the LMH.

During that time period and then some, millions of dollars were spent to upgrade the Melrose Wakefield Hospital and as a result the LMH lost all its' viability to continue being a full scale Medford community hospital that maintained itself in the black, financial column.

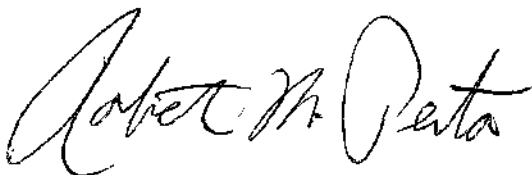
Additionally, adding MBTA buses, as commented earlier, going through the streets of the single family Lawrence Estates neighborhood would add to the pollution, unsightly buses and the commercialization of a for-profit business partnership with Shields operating from the proposed ASC at the LMH location. This was never entertained as a use when the LMH was in a full non-profit operation.

While the presentation of recognizing that medicine and health care has changed, along with insurance coverages of "can and can not" ... this needs to be remediated (if it can be) by the comments of concerns and written testimony by a neighborhood that will be impacted.

I respectfully request DPH in concert with City of Medford officials and residential concerns (verbal and written) at both the 8-15-2018 and 8-22-2018 public meetings postpone any plan approval for a Medford ASC until (1) a complete use plan is provided for the at-present building location, (2) what are the proposed services for the 17,240 s/f on site single floor building,(3) a completed listing of what services will be leaving the LMH as compared to what services are to be proposed,(4) an agreement of understanding between the immediate neighborhood and the Melrose Wakefield Healthcare (Wellforce) proposal and (5) not until an annual payment in lieu of taxes agreement to be paid to the City of Medford is contractually in place.

I can be reached for any further discussion if anyone so choses.

Respectfully submitted,



Robert M. Penta

