



Stephanie M Burke
Mayor

City of Medford

Office of The Mayor

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August 22, 2018

Massachusetts Department of Public Health
Determination of Need Program
250 Washington Street, 6th floor
Boston, MA 02108

This letter is in reference to the Determination of Need Hearing regarding Medford Surgery LLC's proposal before the Department of Public Health for a free-standing ambulatory surgery center (ASC) at the Lawrence Memorial Hospital campus.

The City of Medford is eager to learn of MelroseWakefield Healthcare's proposed plan to revitalize the Lawrence Memorial Hospital campus. While healthcare is changing, so are the needs of our residents. It is our goal to work with Melrose Wakefield Healthcare to find a solution that will fit the needs of our City while mitigating any potential negative effects that the proposal may bring to the surrounding neighborhood. The concerns of elevated traffic and parking have been the two issues predominately raised to my office.

Throughout the Commonwealth, there has been an increase in the use of side streets due to new cellphone applications, such as Waze, that help commuters navigate around traffic. These applications reroute commuters off highways and into residential neighborhoods to avoid traffic. With this new technology the usage of Lawrence Road and Governors Ave, along with many other side streets, has increased. To date, no traffic study has been furnished to the City of Medford or its residents. Any proposal that MelroseWakefield Healthcare brings before the City must include an in-depth traffic study.

A related issue is ample parking on campus. Many worry that overflow parking will fall into abutting neighborhoods. Similarly, at a recent public meeting at Medford City Hall regarding the proposed ACS, the proponent was unable to supply any information about daily trips being generated or the number of spots needed for this center. The City of Medford will require that MelroseWakefield Healthcare has adequate parking, on campus, to suit their needs for not only the proposed ASC but also the urgent care center and all other services being offered on site.

While we have communicated with MelroseWakefield's administration, we have not been informed nor engaged to date in the required process for addressing state-defined Health Priorities through Community Based Health Initiatives (CHIs). We would like clarification on MelroseWakefield Healthcare's community engagement process and would ask that Medford's Board of Health be included in any process that seeks to identify DoN health priorities and related strategies. We also would ask that DPH closely monitors the transparency of what should be a public process in selecting and distributing CHI funds related to this DoN process. The City of Medford also requests MelroseWakefield Healthcare provide any statistics that demonstrate

the need for a dedicated ASC in the City of Medford.

Access to healthcare in our community is imperative. Current regulations require that EMS transport patients to the closest geographic hospital, that is equipped with a licensed emergency department. If the emergency department at the Lawrence Memorial Hospital closes, EMS will not be able to transport patients to this campus. By regulation, EMS is not permitted to bring a patient to an urgent care center. Middlesex County has the highest population of senior citizens in the Commonwealth who are lucky enough to be able to age in their community. It is vital that the future vision of the Lawrence Memorial Hospital campus takes this into consideration.

The Medford Board of Health and my office have been in communication with the administration from MelroseWakefield Healthcare. It is our mission to voice and ensure that the needs, concerns, and ideas of our residents are met. We are hopeful that the identity of the Lawrence Memorial will remain while improving to meet the City's changing needs. I am committed to providing a vibrant and healthy community for all.

Respectfully,

A handwritten signature in cursive script that reads "Stephanie M. Burke".

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Dear Director Mann:

This letter is in reference to the Determination of Need Hearing regarding Medford Surgery LLC's proposal before the Department of Public Health for a free-standing ambulatory surgery center (ASC) at the Lawrence Memorial Hospital campus.

The City of Medford is eager to learn of MelroseWakefield Healthcare's proposed plan to revitalize the Lawrence Memorial Hospital campus. While healthcare is changing, so are the needs of our residents. It is our goal to work with Melrose Wakefield Healthcare to find a solution that will fit the needs of our City while mitigating any potential negative effects that the proposal may bring to the surrounding neighborhood.

The following are the City's concerns regarding the proposed ASC:

Elevated Traffic:

Throughout the Commonwealth, there has been an increase in the use of side streets due to new cellphone applications, such as Waze, that help commuters navigate around traffic. These applications reroute commuters off highways and into residential neighborhoods to avoid traffic. With this new technology the usage of Lawrence Road and Governors Ave, along with many other side streets, has increased. To date, no traffic study has been furnished to the City of Medford or its residents. Any proposal that MelroseWakefield Healthcare brings before the City must include an in-depth traffic study.

Adequate Parking:

Many worry that overflow parking will fall into abutting neighborhoods. Similarly, at a recent public meeting at Medford City Hall regarding the proposed ACS, the proponent was unable to supply any information about daily trips being generated or the number of spots needed for this center. The City of Medford will require that MelroseWakefield Healthcare has adequate parking, on campus, to suit their needs for not only the proposed ASC but also the urgent care center and all other services being offered on site.

Sound Community Engagement:

While City officials have communicated with MelroseWakefield's administration, there have been only 2 occasions where MelroseWakefield Healthcare has engaged the community as whole. I would ask that MelroseWakefield Healthcare engage the community in a more thorough manner. This is a necessary to

determine the needs of our community.

Community Based Health Initiatives:

To date, the City of Medford has not been informed nor engaged in the required process for addressing state-defined Health Priorities through Community Based Health Initiatives (CHIs). We would like clarification on MelroseWakefield Healthcare's community engagement process and would ask that Medford's Board of Health be included in any process that seeks to identify DoN health priorities and related strategies. We also would ask that DPH closely monitors the transparency of what should be a public process in selecting and distributing CHI funds related to this DoN process.

Determination of Need:

The City of Medford has not been provided with any statistics that demonstrate the need for a dedicated ASC in our City. We request MelroseWakefield Healthcare provide any statistics that demonstrate this need.

Renovation v. New Construction:

While MelroseWakefield Healthcare has informed the City and its residents that the construction of a new facility would cost \$3,000,000 less than the renovation of the existing footprint of the campus, we have not been provided any concrete evidence of this. The City would like to see factual evidence that renovating the existing structure would not be cost effective.

24 Hour Care:

Access to healthcare in our community is imperative. Current regulations require that EMS transport patients to the closest geographic hospital, that is equipped with a licensed emergency department. If the emergency department at the Lawrence Memorial Hospital closes, EMS will not be able to transport patients to this campus. By regulation, EMS is not permitted to bring a patient to an urgent care center. Middlesex County has the highest population of senior citizens in the Commonwealth who are lucky enough to be able to age in their community. It is vital that the future vision of the Lawrence Memorial Hospital campus takes this into consideration.

The Medford Board of Health and my office have been in communication with the administration from MelroseWakefield Healthcare. It is our mission to voice and ensure that the needs, concerns, and ideas of our residents are met. We are hopeful that the identity of the Lawrence Memorial will remain while improving to meet the City's changing needs. While the idea of a new state-of-the-art facility is appealing, the City and its residents need more concrete details for us to fully support this endeavor. I am excited to see the commitments that MelroseWakefield Healthcare will make to ensure a vibrant and healthy community for all.

Respectfully,



Stephanie M. Burke
Mayor