

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

To: Massachusetts Department of Public Health, Determination of Need Program  
Re: Medford Surgery Center, LCC Application

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

I am concerned by the lack of engagement and involvement of the local Medford community, who will experience the most direct, negative impacts from the project, including (but not limited to) issues related to traffic, parking, safety, noise, pollution, property value, and the residential character of the surrounding neighborhoods. Prior to approving this proposal I ask that the potential impact the the residential neighborhood be thoroughly evaluated and the results be shared with the local community.

I am also concerned by the lack of information and transparency at all stages of this process. There has been little or no detailed information shared about the current project and possible future projects on site (for example, construction of parking garage, changes in use of existing hospital building, etc.).

On August 15 2018, representatives from Lawrence Memorial Hospital met with the community at the Medford Town Hall during which they misrepresented many aspects of the plan, leaving Medford residents ill informed and mistrusting of the proposal. Prior to approving this proposal I ask that the short term plan for the Ambulatory Surgical Center be clarified and that the long term plan for the existing facilities and services be shared. Below are examples of the misinformation shared on August 15th with the community:

- Surveying has not started
  - Prior to August 15th land surveyors were seen in abutting neighbors yards surveying the Lawrence Memorial Hospital perimeter
- The footprint for the 2 proposed locations have not been determined
  - Footprint markings for the facility have been spray painted on the the property of Lawrence Memorial Hospital
- There will be negligible impact on traffic
  - Impact cannot be known without doing a traffic study which the hospital acknowledged has not been completed, as a result negligible impact can not be known.
- In the beginning of the meeting it was communicated that the Surgical Center needs to be co-located with a hospital, later in the meeting it was communicated that patients requiring emergency services would be brought to neighboring hospitals.
  - Neighboring surgical centers in Waltham and Winchester are not co-located with hospitals so this does not appear to be true.
- There are no plans to move the nursing school or close the Emergency Room

- Employees of the nursing school were notified that the school would be relocated within 2 years.
- Parking will be fully on premise and there are no plans to build a parking garage.
  - Current plans are to build a 17,000 foot building in the existing parking lot which will eliminate approximately 200 parking spaces. Ambulatory Surgical Centers require a high amount of parking due to the high turn over of the patients. It is highly unlikely that that the current plan to eliminate parking will suffice for the new structure.

I recommend that the Department of Health reject or delay approval of this project until these concerns are properly addressed.

Sincerely,  
Tara Miner

