

368 Main Street  
Medfield, MA 02052  
March 28, 2020

**Received 3/31/20**

Planning Board  
Town of Medfield  
459 Main Street  
Medfield, MA 02052

Dear Members of the Planning Board:

I am writing this letter to explain the reasoning behind the proposed amendment to the zoning bylaw regarding parking regulations for assisted living in the Medfield State Hospital area, and to request your support for the amendment.

Table 2 in Article 300-20, "Medfield State Hospital District" currently stipulates that an assisted living facility requires no more than 0.41 spaces per unit. The proposed amendment changes that to 0.82 spaces per unit.

For assisted living, the key question is: How many spaces does the facility actually need so that employees, visitors, residents, physical therapists and others serving the residents, vendors, vans, delivery trucks, etc. can always find an open parking space, especially when some spaces are reserved for the handicapped? This is especially important for public safety as cars parking outside of designated spaces could impede emergency vehicle access to the facility. (Emergency vehicles come to assisted living facilities frequently.)

Additionally, this is important because without enough parking spaces in the lot, vehicles could end up parked in spaces designated for other residences or businesses or on local roads, causing safety issues.

It is also important because the space per unit figure for the Hospital District sets a precedent for assisted living facilities in other zoning districts.

It seems likely that the 0.41 spaces per unit figure in the current bylaw derives from parking generation data from the Institute of Transportation Engineers (ITE). However, the ITE data were collected over several decades from a very heterogeneous collection of facilities from all around the country, which undoubtedly vary in terms of number of employees, availability of public transportation, numbers of visits by physical therapists and others serving residents, etc.

Indeed, in the tables from the ITE's Parking Generation, 4<sup>th</sup> Edition, average peak parking demands as high as 0.76 cars per unit were found on weekdays, and 0.67 on weekends.

In fact, the 0.41 ITE standard is not what is used in our area to determine parking requirements because it calls for too few spaces. For example, Westwood now requires one space for each sleeping room for double or single occupancy. Furthermore, the 0.41 figure – and even a figure more than 50% higher -- is not consistent with the Medfield ZBA's decision on the proposed LCB assisted living facility (please see below).

My wife and I have surveyed several nearby assisted living facilities to assess parking. These findings are summarized in the table below:

Facility	No. of units	No. of parking spaces	Ratio of parking spaces: units
Bridges by EPOCH - Westwood	64	63	0.98
Avita - Needham	62	49	0.79
White Oak Cottages - Westwood	24	18	0.75
Benchmark - Norwood	90	63	0.70
Traditions - Dedham	95	54	0.57

These ratios of parking spaces to units, all of which are higher than the proposed 0.41, result in few if any unused spaces. When my wife and I visited these and other local facilities, we found the parking lots quite crowded. A phone call to the Benchmark facility in Norwood revealed that there are occasions when the 63 parking spaces in their lot (0.70 units per unit) are not adequate. For those occasions, Benchmark has a standing arrangement with Xaverian Brothers High School, which is directly across the street, for additional parking. It's not clear what would happen in such an event at the State Hospital site.

Furthermore, although the lowest ratio in the table – for Traditions of Dedham -- is roughly 50% higher than the 0.41 ratio proposed, that ratio is clearly inadequate. During Medfield ZBA hearings on the proposed LCB assisted living facility, the ZBA's consultants asked LCB's consultants (McMahon) to look specifically at parking at Traditions of Dedham. In fact, McMahon found that this facility had an average demand of 0.58 spaces per unit on weekdays at midday even though public transportation to the facility is available. (This includes a bus with stops quite close to the facility and commuter rail not very far away.) Please note that this 0.58 average demand ratio is actually higher than the ratio of parking spaces to units at this facility (see Table). Indeed, when I visited Traditions of Dedham, I found at least 9 cars parked outside of designated spaces. This creates a dangerous situation.

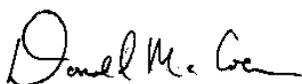
Accordingly, the Medfield ZBA in its decision found that the even higher ratio of 0.65 spaces per unit proposed for the LCB facility was not adequate, especially as there was no public transportation available for that site.

There is similarly no public transportation available for the Medfield State Hospital site. I realize that the town wishes to encourage public transportation by limiting parking. That is why the amendment proposes 0.82 spaces per unit rather than a higher figure.

In summary, I urge you to support the amendment.

Thank you very much for your consideration,

Sincerely,



Donald M. Coen