

# *From the Law Office of Terrence P. Morris, Esq.*

## Memorandum

**To:** Katie Whewell, Senior Planner  
**From:** Terrence P. Morris, Esquire  
**Cc:** Gilli Lavrishina  
**Date:** August 20, 2021  
**Re:** For-Profit Driving School, 1087 Beacon Street

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Katie, Initially, given the nature of your requests for further information this week, both Gilli and I thought direct contact with you would be simpler and avoid any miscommunication, since much of the requested information involved details of the operation and was not of a legal nature. Late yesterday, however, Gilli contacted me for assistance in this regard, as she was having trouble formulating a response.

Until we reach a safe plateau from the pandemic, which remains much in doubt, all classes will be conducted virtually. Notwithstanding that fact, the client needs to establish a place of business to obtain the necessary permitting from the registry. For that reason, despite not having been able to conduct any business from this location, she has been paying rent on the subject property for the past 8 months, during the pendency of this special permit application. Hence, these responses are predicated on a post-pandemic operation. Accordingly, kindly accept this memo as our collective best effort to be responsive.

### **Classroom Schedule Options**

To receive the required 30 hours of instruction students are offered 2 options for classroom work: regular or intensive. Regular classes consist of two 2-hour sessions, 2 days a week, for 7.5 weeks. Classes are held Mondays and Wednesdays from 4 to 6 PM. Intensive classes, offered during school vacation weeks and the summer season, consist of five 6-hour sessions, Monday through Friday. Since this is a satellite office for the school there will be no driving instruction conducted from this site.

### **Pick-up and Drop-off**

Based upon the client's experience, the average attendance for regular classes, is 5 students. Parents will be dropping off students for regular classes about 5-10 min before class.

There are 2 entrances to the building: one on Walnut Street and a 2<sup>nd</sup> entrance on the south side from Beacon Street. Each entry is serviced by a parking lot located on either side of the building.

For intensive classes, we expect a maximum of about 30 students only when school is not in session. Upon registration, we propose to manage the arrivals by assigning one of three, 10-minute intervals to each student for a staggered drop-off, beginning at 9:30 AM. Parents will also be informed of their assignment to a particular point of entry and parking lot, to further distribution of the arrivals. This information will be confirmed to parents in an email one week prior to actual attendance.

### **Assumptions, Actual Practice and Real-Life Experience**

Based upon our business model and past experience, we expect that a majority of students' parents will carpool and. 90% of students will be from Newton; some students will bike to school, and others will walk. Finally, human nature being what it is. This site is immediately adjacent to 3 large commercial parking lots, one of which services a Whole Foods and the other a Walgreens. It is inevitable that there will be parents who will be using one of these lots to disembark their valued passengers.