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December , 2016

Ms. Martha Frisone, Assistant Chief
Ms. Celia Inman, Project Analyst
Certificate of Need Section/Department of Health Service Regulation
2704 Mail Service Center
Raleigh, NC 27699-2704



RE: Comments on Certificate of Need Applications for an Ambulatory Surgical Center in Brunswick County; Brunswick Surgery Center, Project ID# O-011282-16 and Novant Health Brunswick Outpatient Surgery, Project ID# O-011283-16

Dear Ms. Frisone and Ms. Inman:

I'm writing to oppose the approval of both Certificate of Need applications for an ambulatory surgery center in Leland. In short, approval of either application would be an unnecessary duplication of resources and have a significant negative impact on Doshier Memorial Hospital and the patients of Southern Brunswick County.

Consider the following facts:

- Leland has only 21 percent of the county's 133,700 people and is only six miles from metropolitan Wilmington.
- Patients and families in the Southport area would be required to travel at least 50 miles roundtrip to receive surgical care; patients from the Calabash area would travel in excess of 90 miles.
- Brunswick Surgery anticipates shifting significant outpatient volume from Doshier Memorial Hospital, undermining the viability of North Carolina's only independent Critical Access Hospital that is not owned or operated by a healthcare system, and compromising access to medical care for area patients.
- Novant Brunswick Surgery anticipates shifting a large volume of patients currently receiving care at Brunswick Novant Medical Center to a facility in another city.
- Patients experiencing post-surgical complications would be required to go to a hospital Emergency Department in a different city from where the procedure was performed.
- Doshier Memorial Hospital provides top-flight surgical services and currently has excess surgical capacity to absorb any anticipated increase in patient volume. Approval of either application would clearly be an unnecessary duplication of Doshier's surgical capacity.

Neither application follows the State Plan need for just one operating room but proposes the equivalent of three operating rooms. Neither protects the interests of rural communities. Both would come at long term negative cost to a rural hospital and a community with one of the oldest populations in the State.

I respectfully ask that you disapprove both applications.

Sincerely,

Kathleen Geiger

Wolf & Kathleen COEGER Date *Dec. 29/2016*

signed

WOLF and

Printed Name

KATHLEEN COEGER

Address

*3533 SANDERLING DRIVE
SOUTHPORT NC 28461*