

Mar 31 2026

STATE HEALTH PLANNING AND  
DEVELOPMENT AGENCY

Law Office of David E. Belser  
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March 31, 2026

Hon. Emily T. Marsal  
Executive Director  
State Health Planning and Development Agency  
100 North Union Street  
RSA Union Building, Suite 870  
Montgomery, Alabama 36130  
[shpda.online@shpda.alabama.gov](mailto:shpda.online@shpda.alabama.gov)

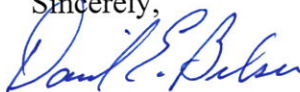
**Re: Request for Determination of Non-Reviewability Gulf Coast Surgical Partners,  
LLC ("GCSP") Mobile County Alabama – CON 1995-ASC; Project # AL2002-015**

Dear Ms. Marsal,

This letter is in response to SHPDA's letter dated December 1, 2025, requesting additional information concerning the above referenced request for non-reviewability. The supplemental request for information is as follows:

1. The Certificate of Need subject of this reviewability request is Certificate of Need # 1995-ASC issued May 2, 2002, and revised on February 23, 2016. Attached are copies of the two issued Certificates of Need.
2. The complete ownership structure of Gulf Coast Surgical Partners, LLC is Springhill Medical Complex, LLC, Celia A. Wallace, Kirsten C. Rudolph, Jeffrey St. Clair, Christopher A. Park, MD and Mark R. Gacek, MD.
3. The current number of operating rooms at this ASC is 4. Furthermore, SHPDA request the type of gastrointestinal and urology procedures to be performed in the ASC. The procedures to be performed are those outlined in the CMS approved list of those specialties for Ambulatory Surgery Centers.

Should he have any further questions, please do not hesitate to contact me.

Sincerely,  
  
David E. Belser

**ALABAMA  
STATE HEALTH PLANNING & DEVELOPMENT AGENCY  
CERTIFICATE OF NEED  
FOR HEALTH CARE SERVICES**

**I. IDENTIFICATION**

1. Certificate of Need 1995-ASC	2. Date Issued: May 2, 2002	3. Termination Date: May 1, 2003
4. Project Number: AL2002-015	5. Name of Facility: Springhill Memorial Hospital and Gulf Coast Surgical Partners, LLC	
6. Service Area: Mobile County	7. Location of Facility: 3719 Dauphin Street Mobile, AL	
8. Type of Facility: ASC	9. Number of Beds: N/A	10. Estimated Cost: \$13,715,000

11. Services to be provided: Development of an outpatient, freestanding, Ambulatory Surgery Center with four operating rooms, two procedure rooms and appropriate support space.

**II. CERTIFICATE OF NEED**

In accordance with Section 22-21-264 through 22-21-279, Code of Alabama, 1975, the Certificate of Need Review Board finds as follows:

1. There is a need for the project.
2. There are in force in the State of Alabama reasonable minimum standards of licensure and methods of operation for hospitals and health facilities.
3. The prescribed standards of licensure and operation will be applied and enforced with respect to the applicant, hospital or other health facility.

**III. ISSUANCE OF CERTIFICATE OF NEED**

This Certificate of Need is issued to **Springhill Memorial Hospital and Gulf Coast Surgical Partners, LLC** only, for a period not to exceed 12 months from the date of issuance. This Certificate of Need is not transferable and any action on the part of the Applicant to transfer this Certificate of Need will render the Certificate of Need null and void.

**ORIGINAL**  
Revised February 23, 2016

  
\_\_\_\_\_  
Alva M. Lambert  
Executive Director

**ALABAMA  
STATE HEALTH PLANNING & DEVELOPMENT AGENCY  
CERTIFICATE OF NEED  
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6. Service Area: Mobile County	7. Location of Facility: 3719 Dauphin Street Mobile, AL	
8. Type of Facility: ASC	9. Number of Beds: N/A	10. Estimated Cost: \$13,715,000

11. Services to be provided: Development of an outpatient, freestanding, Ambulatory Surgery Center with four operating rooms, two procedure rooms and appropriate support space. The Center will provide orthopedic outpatient surgical services.

**II. CERTIFICATE OF NEED**

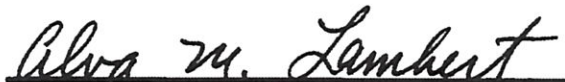
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**ORIGINAL**



Alva M. Lambert  
Executive Director

Nov 20 2025

**Law Office of David E. Belser**  
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Montgomery, AL 36106  
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November 14, 2025

Hon. Emily T. Marsal  
Executive Director  
State Health Planning and Development Agency  
100 North Union Street  
RSA Union Building, Suite 870  
Montgomery, Alabama 36130  
[shpda.online@shpda.alabama.gov](mailto:shpda.online@shpda.alabama.gov)

**Re: Request for Determination of Non-Reviewability  
Gulf Coast Surgical Partners, LLC ("GCSP") Mobile County Alabama**

Dear Ms. Marsal,

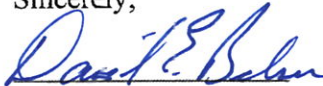
This firm represents Gulf Coast Surgical Partners, LLC, ("GCSP") a Medicare-certified multi-specialty ambulatory surgery center located at 3610 Springhill Memorial Drive North, Mobile, Alabama 36608. This surgery center has been operational for over 20 years, and the majority ownership is owned by Springhill Medical Complex, Inc. Pursuant to Certificate of Need Rules and Regulations § 410-1-7-02 please accept this letter as a request for your determination that GCSP's proposed addition of two procedure rooms and one scope processing room are not subject to CON review. GCSP currently has two procedure rooms, and the addition of two procedure rooms will be used to perform certain GI and urologic procedures that do not require the operating room environment.

This project involves converting three existing 23-hour stay rooms to accommodate two procedure rooms and a scope processing room. (See attached floor plans) No new operating rooms or inpatient beds are being created, no new services will be provided, and the renovation does not alter GCSP's existing licensure or classification as an Ambulatory Surgery Center. The project will utilize existing infrastructure, staff and support services already on site. GCSP anticipates the cost associated with the proposed project to be below the applicable spending thresholds for CON review and such costs are as follows:

	<u>Cost</u>	<u>CON Threshold</u>
Construction/renovation -	\$500,000.00	\$6,866,313.00
Equipment - Endoscopes -	\$569,813.40	
Automated Scope Washers -	\$225,424.23	
Electrosurgical Units -	<u>\$50,253.34</u>	
Total:	\$845,490.97	\$3,436,510.00
First year annual operating cost -	\$912,054.00	\$1,373,260.00

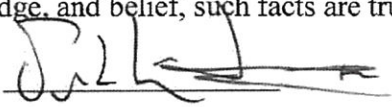
Accordingly, based on the above, GCSP requests your determination that the addition of two procedure rooms and a scope processing room is not subject to COM review under Ala. Code §22-21-260 et. sec. and the CON rules and is permissible without further filings or requests to SHPDA. Thank you for your response to this matter and if you should need any further information, please let me know.

Sincerely,

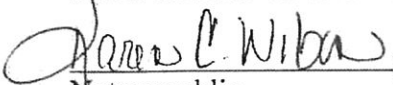
  
David E. Belser

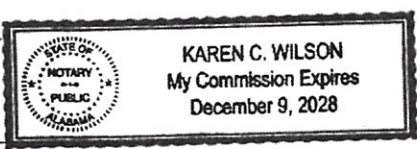
**Affirmation of requesting party**

The undersigned, being first duly sworn, hereby make oath or affirm that he is the administrator for GCSP, LLC, has knowledge of the facts in this request, and to the best of his information, knowledge, and belief, such facts are true and correct.

Affiant 

SUBSCRIBED AND SWORN to before me this 14th day of November, 2025.

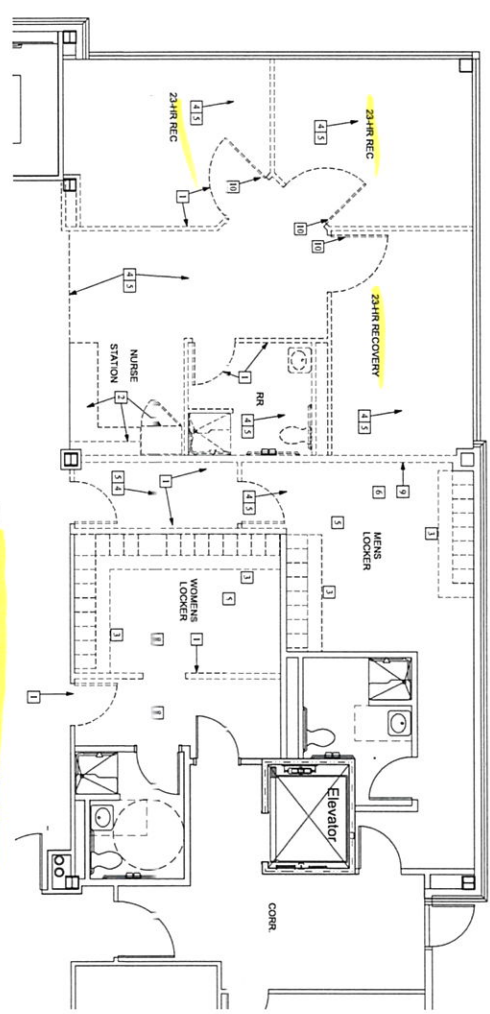
  
Notary public



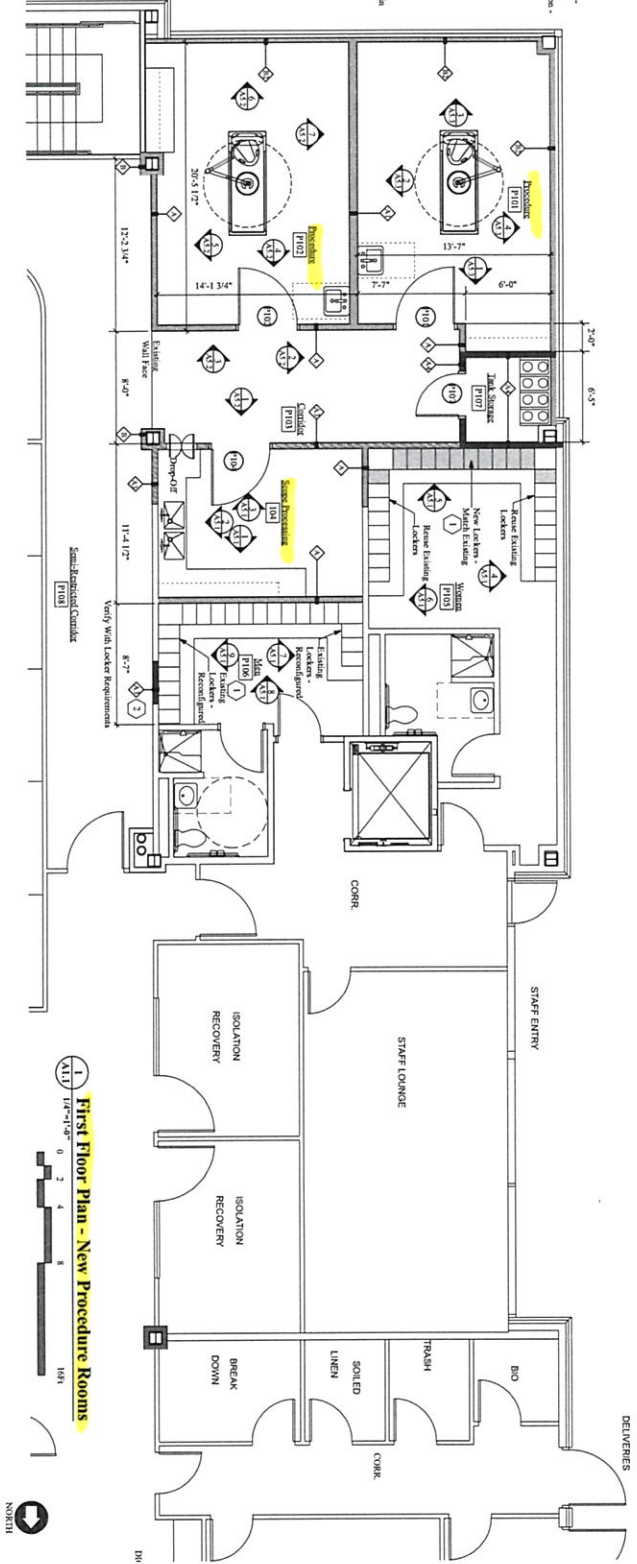
My commission expires: \_\_\_\_\_

(SEAL)

- Demolition Legend**
- Existing Wall to be Removed (Indicates Any Wall Mounted Accessories)
  - Existing Doors & Frames to be Removed
  - Existing Wall to be Removed with Aboard Wall to be Removed
  - Existing Shower Pan to be Removed - Cap Off Finishing Patch and Seal Any Floor Opening
  - Existing, Thick, m. m. Abundant Cap Off Finishing Patch and Seal Any Floor Opening
  - Existing Walls to Remain
  - Existing Doors to Remain
- New Construction Legend**
- New Shower Pan
  - New Wall Types
  - New 1 Hour Rated Partition - See Wall Types
  - New Wall Types - See Wall Types
  - New Door and Frame - See Door Schedules
  - Room Name
  - Room Number
  - Existing Walls to Remain
  - Wall Types
  - Elevation Symbol
  - Section #
  - Page #
  - Note: Refer to LSI 11 Life Safety Plan For Additional Information.
- New Construction Work Notes**
1. Remove and Reconfigure Existing Lockers in Layout As Shown. Provide New Lockers As Needed. Match Existing Lockers. Provide New Lockers As Needed. Provide New Padlocks As Needed. Remove Existing Door and Frame. Fill Remaining Opening With Wall Construction To Match Existing (Add Thickness)
  2. Remove Existing Door and Frame. Fill Remaining Opening With Wall Construction To Match Existing (Add Thickness)



**2 Existing First Floor - Demolition Plan**  
 1/4" = 1'-0"  
 0 2 4 6 8 10 FT



**1 First Floor Plan - New Procedure Rooms**  
 1/4" = 1'-0"  
 0 2 4 6 8 10 FT

- Demolition Notes**
1. Remove Walls and Doors As Shown.
  2. Remove Existing Casework (Desk, Cabinet)
  3. Remove Existing Lockers As Required For New Construction. Remove For Reuse And Keep Clean. Remove Framed Partition Below.
  4. Remove Existing Floor Finish Within The Areas Shown For Demolition And New Finish. See Finish Schedule.
  5. Remove Existing Ceiling In All Areas Of New Work. Remove Lighting And Show For Owner's Future Maintenance.
  6. In The Patient Women's Locker Room, Remove Floor VCT As Required. VCT Shall Remain Within The New Locker Area.
  7. Existing VCT Within The New Scope Proceeding Shall Be Removed. Prepare Sub for New Finish.
  8. In The Patient Women's Locker Room, Remove Existing VCT As Required. VCT Shall Remain Within The New Locker Area.
  9. Remove Existing Show Wall Of Locker Room And Reducer. As Shown.
  10. Remove and Reuse Nond-Finishing Doors, Frames, And Hardware For Reuse. Refer To Door Schedule.

	<p>1500 SPRINGHILL AVENUE        MOBILE, AL 36608        TEL: 251-938-8811</p>
<p>WALCOTT        ADAMS        VERNEUILLE        ARCHITECTS</p>	<p>DATE: October 14, 2021        PROJECT: First Floor Plan - New &amp; Demolition        DRAWING NO: A1.1.1</p>

**First Floor Renovations for the Bonemenders Building Springhill Medical Center**  
 3610 Springhill Drive N.  
 Mobile, AL 36608

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