



June 5, 2025

Centers for Medicare & Medicaid Services
U.S. Department of Health and Human Services
7500 Security Boulevard
Baltimore, MD 21244

Subject: Concerns Regarding Proposed Loss of Critical Access Hospital Designation for Glenn Medical Center

To Whom It May Concern,

On behalf of the Sites Project Authority, we are writing to express concern over the potential loss of Critical Access Hospital (CAH) designation for Glenn Medical Center. As a near-term, multi-billion-dollar regional infrastructure project to be constructed in western Glenn and Colusa Counties, the Sites Reservoir Project (www.sitesproject.org) will rely on the availability of nearby emergency medical care, particularly during high-risk phases of project construction and operation.

Glenn Medical Center is the closest emergency care facility to our project site. It will play an essential role in providing stabilization and trauma support to project personnel, contractors and the rural residents living and working in proximity to the Sites Reservoir footprint. The loss of this facility, due to a Center for Medicare & Medicaid Services' (CMS) geographic distance determination, would create a significant gap in emergency response capabilities, potentially putting lives at risk and undermining worker safety standards for a project of this magnitude.

We respectfully urge CMS to consider not just theoretical distance, but also to consider that:

- The Sites Reservoir Project will soon begin a 7-year major construction project.
- We estimate there will be periods when the total worker count will be more than 1,000 per day.
- The Project has been coordinating with nearby law enforcement and emergency response agencies, who have raised concerns about the region's current capabilities to deal with this level of worker influx.
- The proposed changes could lead to closure of the Glenn Medical Center which would remove a critical facility from helping to meet these increased needs.
- Beyond the project construction, there will be major recreation at the Reservoir that could lead to increased emergency care needs.



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- Transportation routes, in this part of the Sacramento Valley, are often affected by agricultural traffic, flooding and poor weather conditions. These are factors that can delay urgent medical transport to more distant facilities. In emergencies, where every minute counts, proximity matters. Glenn Medical Center's Emergency Department provides critical 24/7 care in situations where longer transport times could prove catastrophic. The addition of the Sites Project to the area has the potential to increase these types of incidents, which could translate to increased use of the Glenn Medical Center.

We ask that you consider these project related factors in your consideration of Glenn County's appeal and CMS's consideration to retain Glenn Medical Center's CAH status. Doing so is not only a matter of public health, but also a matter of regional viability and the long-term success of the Sites Reservoir infrastructure investments.

Thank you for your consideration.

Sincerely,



Jerry Brown
Executive Director
Sites Project Authority

CC:

Glenn County Board of Supervisors

Colusa County Board of Supervisors

The Honorable Doug LaMalfa, U.S. House of Representatives

The Honorable Alex Padilla, U.S. Senate

The Honorable Adam Schiff, U.S. Senate

