



# PLACER COUNTY SHERIFF'S OFFICE

WAYNE WOO  
SHERIFF-CORONER-MARSHAL

SHAYNE WRIGHT  
UNDERSHERIFF

August 29, 2023

California Department of Public Health / Office of AIDS

To Whom It May Concern:

The Placer County Sheriff's Office, in partnership with the Placer County Probation Department and the Town of Loomis (for whom the Sheriff's Office provides contract law enforcement services), opposes Safer Alternatives through Networking & Education's (SANE) application to the California Department of Public Health, Office of AIDS (CDPH/OA) to add home delivery and pick-up of syringes in Placer County for the reasons outlined below.

### Historical Information Does Not Support the Efficacy of SSPs

SANE's executive director Shilo Jama, who is the Syringe Services Program (SSP) Administrator named on the application, is a lifelong drug user himself, who was formerly the director of the People's Harm Reduction Alliance (PHRA) in Seattle and has spent his career advocating for drug users NOT against drug use.<sup>1</sup> In 2017, he was head of the US's most extensive needle exchange program, handing out 34 million syringes<sup>2</sup> and having no account of how many syringes they collected in exchange. Millions of unaccounted syringes are on the streets, in the parks, and in the community. SANE now expects to distribute 200,000 syringes annually in Placer County, and their estimate to collect 200,000 syringes is not supported by any empirical evidence of past practices. In fact, while they keep a strict account of how many syringes they hand out, they only collect data on "pounds" of used syringes/waste collected. This is clearly an opaque figure that lacks the transparency necessary for public officials to make informed decisions on programs that directly impact the citizens of this County.

Historically, PHRA in Seattle failed to account for or even acknowledge the unintended consequences of the needle exchange program Jama directed there.

SANE's SSP shares many of the same characteristics as needle exchange programs. First and foremost, the end user does not have to hand over a dirty needle to get a clean one.

In Seattle, local harm reduction practitioners like King County Public Health and the People's Harm Reduction Alliance handed out clean syringes to anyone who asked, which could be picked at one of their pop-up tables or at any of several office locations. While this is sometimes called needle exchange, that term is misleading, since the client does not have to hand over a dirty needle to get a clean one.

<sup>1</sup> See, <https://www.thestranger.com/news/2019/02/07/38678944/director-of-peoples-harm-reduction-alliance-targeted-for-helping-drug-users>

<sup>2</sup> See, <https://www.theguardian.com/us-news/2017/dec/07/seattle-washington-drug-overdose-safe-use-spaces>



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Instead of needle exchanges, these locations should be called needle dispensaries. A single drug user may be given hundreds of needles at a time, and boxes of them are often given to known drug dealers, who then hand them out to their customers, streamlining the process for everyone.

Along with needles, harm reduction practitioners in Seattle hand out other drug paraphernalia, including tourniquets (to raise veins for injection drug use); candles and glass pipes ("bubbles") for smoking crack or meth; and foil, for smoking fentanyl. Drug testing kits are also available to help users determine whether their supply of heroin, meth, or cocaine has been cut with fentanyl.<sup>3</sup> The Placer County Sheriff's Office is adamantly opposed to any program that normalizes and promotes illegal drug use in this County.

Nor do we need to limit our examination to the experiences in Seattle. The City of Santa Ana, California, vigorously opposed the Harm Reduction Institutes (HRI) Syringe Program Application in May of this year for many of the same reasons listed above. The City in opposing HRI's application, listed its past experience with the Orange County Needle Exchange Program (OCNEP) operated in the Civic Center in Santa Ana.

Despite the City's pleas, OCNEP failed to properly recover and safely dispose of used hypodermic needles and syringes distributed at the Civic Center, resulting in thousands of used hypodermic needles being discarded in or on the adjacent public buildings, libraries, streets, sidewalks, parks, and waterways both in Santa Ana and elsewhere in Orange County, as documented by Santa Ana in a letter to OCNEP dated December 6, 2017.

## SANE's Application Lacks Transparency and Should Be Denied

It is the Sheriff's Office's position that SANE has provided insufficient information to the public to allow the County and its community members to provide meaningful public comment. The information released to the public on the CDPH's website states that SANE's syringe services will be by home delivery and pick-up, Tuesday-Saturday from 3:00 pm-10:00pm within Placer County. However, the information fails to provide the locations where SANE will be collecting and possibly distributing its needles on Tuesday-Saturday. The County, the Town and their residents have a right to know whether needles are going to be collected and possibly distributed near their neighborhoods, schools, libraries, and parks. Further, the County and Town should be afforded an opportunity to comment on whether the needle collection and possible distribution would be compatible with the surrounding land uses.

## SANE Operating in Placer County Will Have a Negative Effect on Public Health and Result in Environmental Impacts on Surrounding Communities

The information and data provided are illustrative of the fact that cities and counties have a significant interest in the operation of Syringe Services Programs (SSP) within their jurisdiction due to the potential for negative impacts on the community and the documented failure to comply with the provisions of

<sup>3</sup> See, <https://roominate.com/blog/2022/harm-reduction/>



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Health and Safety Code Section 121349. In particular, these provisions include the minimum requirement that the SSP be able to provide funding to "provide for the safe recovery and disposal of used syringes and sharps waste from all of its participants." (Health and Safety Code Section 121349 (d)(3)(C).) Given the extremely troubled history of prior SSPs, the Placer County Sheriff's Office vehemently objects to a Syringe Services Program in its jurisdiction.

The Sheriff's Office and its allied law enforcement agencies have long battled the drug epidemic that has plagued the United States. In Placer County, we have consistently fought against the acceptance of illicit drug use through educational programs, including "1 Pill Can Kill", "Drug Abuse Awareness Education (DARE)," "Red Ribbon Week," "Every 15 Minutes", and "The Right Choice." These programs are time and resource-intensive and require hundreds of hours of staff time and funding. Their primary goal is to reduce the acceptance of drug abuse in our communities, reduce the number of lives destroyed, and prevent the deaths of our vulnerable residents. Additionally, the Sheriff's Office has designated detectives whose sole focus is to identify and hold accountable individuals who are responsible for distributing illicit substances in our jurisdiction. The proposed SSP significantly undermines these efforts. This is precisely the wrong message to send to our most vulnerable population in the name of "harm reduction."

By giving free needles to intravenous drug users, this SSP will encourage and promote the use of addicting drugs. It also increases drug use acceptance, leading to higher drug abuse rates. This is precisely the opposite of the goal that Placer County law enforcement, local government, and non-profits have worked for decades to decrease.

In the jurisdictions where intravenous drug users are encouraged to safely participate in needle exchange programs, enforcement of drug laws is discouraged. This will undoubtedly pressure local law enforcement to ignore illegal drug use in those areas targeted for needle exchanges. It will also lessen the feeling of safety for those locals who frequent those areas for legitimate purposes due to the influx of addicts looking for free needles.

In addition to normalizing illegal drug use, the distribution of hypodermic needles will undoubtedly increase the number of hypodermic needles circulating throughout our County. Regrettably, the individuals receiving free needles for drug use are not typically the most accountable for properly disposing of them. We oppose models increasing the amount of dirty needles discarded recklessly in our parks, streets, and recreational areas, putting our residents in danger. When drug use increases, this behavior harms public safety, property values, community growth, and local businesses.

In addition to the concerns surrounding SANE's street-based outreach, there is no guarantee that needles delivered to residences will be used privately at that residence. We have repeatedly seen homeowners allow the use of their addresses by those in our homeless community for mail and other services. While this isn't undesirable, allowing this same practice to distribute needles will inevitably



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increase the use of these needles in public areas. Our Homeless Liaison Deputies and Probation Officers report finding needles routinely when patrolling in areas frequented by transients; these also happen to be the same areas where families and children recreate, including bike trails, parks, and walking paths.

Placer County has aggressively sought solutions to address the local homelessness issue and reduce the tragic deaths resulting from illegal drug use. We know unlawful drug use is a significant problem among our homeless population. By taking steps to lessen the stigma of intravenous drug use and encouraging illegal drug use through implementing an SSP, we are actively working against all our best efforts to reduce these tragic deaths, reduce the problems surrounding homelessness, and actively undermine the anti-drug educational programs aimed towards our residents and children.

The Placer County Sheriff's Office Requests a Meeting with the California Department of Public Health, Office of AIDS (CDPH/OA) to Meet and Confer on This Application

Pursuant to the requirements set forth in Cal. Health & Safety Code 121349(c), the Placer County Sheriff's Office requests a face-to-face meeting with the California Department of Public Health, Office of AIDS (CDPH/OA), to meet and confer on the issues raised in this objection to SANE's application and ensure the questions and concerns of the local community are heard by the State.

Respectfully,

Wayne Woo, Sheriff  
Placer County Sheriff's Office

Marshall Hopper, Chief  
Placer County Probation Department