



County of Santa Cruz

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April 18, 2019

California Department of Public Health
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Sacramento, CA 95899-7377
SEPApplication@cdph.ca.gov

**RE: Comments on the Pending Application of Harm Reduction Coalition
of Santa Cruz County**

Dear Director Smith:

It is our understanding that the Harm Reduction Coalition of Santa Cruz County (also known as Harm Reduction Road Show) proposes a syringe access program in Santa Cruz County. The program plans to offer mobile services in Santa Cruz, Felton, and Watsonville and at a fixed site in Watsonville.

We do not support this application. We have concerns about this application because our community has struggled with a persistent syringe litter problem and a new syringe program that is not a 1 to 1 exchange is likely to exacerbate that problem. Santa Cruz County has worked hard to address syringe litter, which we see as a public health issue that needs to be taken just as seriously as the public health issues involved with an injection drug user re-using syringes. The County has placed sharps kiosks in multiple locations, requires local pharmacies to participate in a sharps take-back program, and the County's Syringe Services Program provides sharps containers and urges clients to dispose of syringes properly, yet the syringe litter problem has continued. The syringe litter problem has public health impacts as some parents don't feel safe bringing their children to local parks and open spaces, using local public bathrooms, and participating in summer recreational programs on the beach due to concerns about stepping on syringes. Our residents should not have to live this way.

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In addition, the Harm Reduction Coalition's application doesn't appear to include the oversight and involvement of licensed medical professionals. Santa Cruz County's Syringe Services Program is within the Public Health Division of the County's Health Services Agency, and the program is run with the oversight of Santa Cruz County's Director of Nursing with the help of public health nurses.

We don't see a need for an additional exchange service given that Santa Cruz County operates a Syringe Services Program that maintains two locations and is well known and utilized. In fact, authorizing an additional exchange will undermine the County's exchange which, as mentioned above, is run by medical professionals. A new exchange would rob the County's exchange of the opportunity to connect with clients, counsel them, and connect them to treatment. Santa Cruz County has worked very hard to design and implement a Drug Medi-Cal Organized Delivery System which has significantly expanded treatment capacity and the County's syringe program is in the best position to be able to connect injection drug users with treatment.

We have supported the continuation of Santa Cruz County's Syringe Services Program even though it has been controversial in recent years due to the syringe litter problem. If the State approves the Harm Reduction Coalition's application, it will further polarize our community on this difficult issue and could even jeopardize the County's Syringe Services Program.

Thank you for the opportunity to comment. Please take our view into account.



RYAN COONERTY, Supervisor
Third District

Sincerely,


BRUCE MCPHERSON, Supervisor
Fifth District

CC:

Senator Monning

Assemblymember Stone

Assemblymember Rivas

Santa Cruz County Health Services Agency