



ROSEVILLE POLICE DEPARTMENT

1051 Junction Blvd.

Roseville, CA 95678

Troy Bergstrom, Chief of Police

DATE: September 4, 2023

TO: Marjorie Katz
California Department of Public Health

FROM: Troy Bergstrom
Chief of Police

RE: SANE Application Comments

On behalf of the Roseville Police Department and the City of Roseville, following is our response to the application by SANE for the syringe services program here in Placer County and specifically here in the City of Roseville. We have reviewed SANE's application and have a series of concerns and comments with the application as follows:

- There is concern about the parameters of the delivery of syringes and supplies program as it is loosely defined in the proposal as offering "home delivery and pickup" to areas in southwest Placer County. Under Section 6 of the "Program Information/Statement of Need" portion of the Application, SANE fails to describe what type of home delivery and pick-up is contemplated. There is no mention of a specific fixed location or whether "home delivery" requires delivery to a location with a mailing address, or alternatively if "home delivery" is intended to cover any type of location whereby an individual requests delivery (e.g., a park, open space, parking garage or parking lot, etc.) Without specifics regarding a delivery location or a specific location for needle drop-off, how can we be certain of where syringes will be delivered and how would accountability to that process be ensured so that we do not have boxes of syringes being delivered anywhere without oversight? This also raises the question about the ability to collect used needles in a sanitary capacity that will effectively reduce harm to either the user or innocent citizen that may happen upon an inappropriately discarded syringe at a park, walking trail, or other common location.
- In line with the above lack of specifying what "home delivery" means, in the Proposal Needs statement under Section 9, the proposal talks primarily about homeless needs. Yet the proposal does not address how it would deliver syringes and other services to our homeless population as the proposal only generally talks about "home delivery". How would the program deliver to our homeless population? How would they ensure our parks and other spaces do not become drop off points for syringes and "supplies" where these supplies are common items used to facilitate the use of drugs? There are no parameters identified in the proposal for how this would occur in a proposal that is clearly identified to deliver these supplies to our homeless population wrapped in a proposal for "home delivery".
- One of SANE's main services offered in the application is a rapid, on-site HIV and HCV screening. It appears however, that is a service only offered in Sacramento, which is an inconvenient distance for residents of Roseville to take advantage of this offering. This is particularly difficult for those experiencing homelessness or have limited options for travel, or those who simply need this

service closer to their county of residence where they may already be accessing programs offered through Placer County Health and Human Services. Has SANE done any outreach through Placer HHS to see what is offered in our community and how those services are offered? If SANE is going to offer services in our community, a basic first step would have been to ask our local providers what is already offered and what is needed. Those questions do not appear to have been asked before this proposal was submitted.

- The information provided for the return/exchange/collection of syringes and needles does not appear to be specific to ensure a consistent option for returning used syringes or a location where users can responsibly dispose of the syringes in the interest of public health. The application only mentions that users can arrange for pick-up *during delivery hours* or drop off sharps waste *during office hours*. However, both delivery and office hours are limited, there is no mention of where drop-off locations will be located, and there is no information about what plan SANE has to address individuals who want to discard used syringes outside of these two limited options. It seems presumptuous to assume that those in need of needle exchange services will always plan ahead with requesting pick-up of used needles or will make arrangements to ensure return of used needles to fixed locations (which again, do not appear to be specified in the application). Without fidelity to a specific plan for collection, users may leave used needles in places where children or other citizens come upon them jeopardizing their health and safety. This ties directly into the programs' delivery of these items to our homeless population where discarding these items in a safe manner would be of great concern to our community.
- SANE does not appear to offer a specific plan to account for needle and syringe exchanges. The number of needles delivered and collected should be scrupulously accounted for. Instead, SANE appears to rely on estimated numbers of needles dropped off or collected, which provides little confidence from the public's standpoint about overall program management and safety practices.
- SANE does not offer a partnership with local providers who need to collaborate for program legitimacy and effectiveness. Additionally, who is SANE accountable to in the event they do not act according to the standards set forth in the application? What overarching program exists to provide oversight, accountability, and management for needle users so the exchange is taking place with the entirety of public health in mind? Time and investment on SANE's behalf seem necessary to facilitate that support from County partnerships who are daily engaged with those SANE seeks to serve. If a true partnership with our community was what SANE was interested in building, they could have heard our community's concerns ahead of time, worked to alleviate those concerns, and submitted plans for addressing those concerns in their application, however that was not done.
- Community Outreach ahead of the program appears to have been limited to non-existent. Under the section "steps program has taken to address any reasonable concerns" there is a list of fifteen neighborhood associations in our City, however there is no information included as to whether any outreach was actually done with any of these neighborhoods. Our Department is well connected to our Roseville Coalition of Neighborhood Associations (RCONA) where this list of neighborhoods was obtained. If this proposal had been made to any of these associations, I am highly confident the associations next steps would have been to contact our Department to get more information. We have received no feedback from our neighborhood associations which leads me to believe this was just a list taken from the internet for the application process and no actual outreach has been done. Had that outreach been done, you would likely find widespread objection to a syringe delivery program in our neighborhoods.

The Roseville Police Department is highly integrated with Placer County Health and Human Services in providing needed services to our community. As a result, we rely heavily on the expertise of Placer HHS

when implementing or supporting new programs in our city. There may be some potential service gaps that SANE could fill in order to provide residents with a broader harm reduction. However, without an endorsement from our local health authority that this is a viable program to assist our community, it is difficult to support this program. It is our request that SANE collaborate with Placer County HHS to learn what services are offered here and how they could help. Further, they need to engage in community engagement and learning prior to offering needle exchange services. This learning process is important for hearing from our residents about solutions that would support both those in need of services alongside the needs of our community where services are offered. However, nowhere in the application is there evidence of this collaboration that would be required before our Department could support this program application. Without these very necessary questions answered in their proposal, our Department is against the proposal to the California Department of Public Health and request that you deny the application as submitted.

Thank you again for the opportunity to provide comment and if you have any questions regarding our comments or need any additional information, we would be more than happy to participate in a meeting to discuss this further.

Respectfully Submitted,

A handwritten signature in black ink that reads "T Bergstrom". The signature is written in a cursive, flowing style.

Troy Bergstrom
Chief of Police
Roseville Police Department
(916) 774-5010
tbergstrom@roseville.ca.us