

## **FINAL STATEMENT OF REASONS**

The information contained in the Initial Statement of Reasons at the time of Public Notice remains unchanged. As authorized by Government Code Section 11346.9(d), the California Department of Public Health (Department) incorporates by reference the Initial Statement of Reasons prepared for this rulemaking.

The regulation text was made available for public comment for at least 45 days, from February 19, 2021 through May 6, 2021. A Public Hearing was held on April 14, 2021. A summary of public comments is below.

### **Statements of Determinations**

#### **Local Mandate Determination:**

The Department has determined that the regulation would not impose a mandate on local agencies or school districts, nor are there any costs for which reimbursement is required by part 7 (commencing with Section 17500) of division 4 of the Government Code, nor are there any other nondiscretionary costs imposed. The change clarifies the authority of local governments and the state in authorization of a syringe exchange program (SEP). It does not create new mandates. All authority was established in 2011 through passage of Assembly Bill (AB) 604 (Skinner, Statutes of 2011) and defined in Health and Safety Code 121349(b) and 121349(c).

#### **Economic Impact Assessment:**

These proposed regulations do not eliminate jobs but may create new job opportunities as they may provide additional opportunities for new SEPs to form. These proposed regulations may allow existing SEPs doing business within the State of California to increase the size or scope of their operations or expand into new geographic areas to respond to public health need.

#### **Anticipated Benefits to Public Health, Worker Safety and the Environment:**

These proposed regulations will not affect worker safety. They may improve the health and welfare of California residents by affording the creation of new SEPs, which have been found to reduce the transmission of HIV, HCV and other bloodborne pathogens.

Scientific studies have found that the presence of SEPs increases the likelihood that used syringes will be safely disposed of, and thus reduce litter in the environment. SEPs also reduce the odds that used syringes in circulation contain viral or bacterial pathogens, and thus protect public health by reducing the potential infectiousness of injection equipment that may be reused or shared by people who inject drugs.

#### **Consideration of Reasonable Alternatives:**

The Department must determine that no reasonable alternative considered by the Department or that has otherwise been identified and brought to the attention of the

Department would be more effective in carrying out the purpose for which the action is proposed or would be as effective and less burdensome to affected private persons than the proposed regulatory action or would be more cost-effective to affected private persons. Because this proposal makes technical, non-substantive, or clarifying changes to current regulations, The Department made an initial determination that no reasonable alternative existed.

The Department considered two types of suggestions from commentators on elements of the proposed rulemaking, including:

1. To leave the regulations unchanged.
2. To leave the length of the public comment period at 90 days.

The Department rejected these alternative proposals, in part because the length of public comment period was changed in Health and Safety Code 121349(e) and must be changed in the regulations to match. No other suggestions for changes to the proposed regulations were submitted by the public.

Consequently, in accordance with Government Code Section 11346.9(a)(4), the Department has determined that no alternative would be more effective in carrying out the purpose for which the regulation is proposed; or would be as effective and less burdensome to affected private persons than the proposed regulation; or would be more cost-effective to affected private persons and equally effective in implementing the statutory policy or other provision of law.

### **Authority Cited and References**

Two code sections have changed since DPH-11-021, Syringe Exchange Program Certification was finalized in 2013. AB 1743 (Ting, Chapter 331, Statutes of 2014) deleted BCP 4145, and AB 2077 (Ting, Chapter 274, Statutes of 2020) deleted HSC 121285. References to these code sections are now deleted from the Authority Cited and References sections in CCR Title 17, Sections 7000, 7002, and Section 7014. These are non-substantial changes.

### **Public Comment Period and Public Hearing**

Of the 289 written comments received during the public comment period, 167 were in support of the proposed regulations, 122 were in opposition.

The public hearing was held virtually due to COVID-19 protocols on April 14, 2021. Eighty-four people logged on to the hearing and 24 commented. Thirteen were in support of the proposed regulations, 11 were in opposition.

Nineteen municipalities or local elected officials also commented either in writing or at the public hearing, or both.

### **Summary of Written and Oral Comments and Department Responses**

The summary of written and oral comments is organized by theme.

The list of all commenters can be found in Appendix One. Individual commenters are indicated in the summary below with the number corresponding to their name in the appendix. Those individuals who made oral comment during the public hearing are indicated *PH* plus the corresponding number. Municipalities or local elected officials are indicated by *Muni* plus the corresponding number.

- 1) **Comment:** Commenters expressed their support for the proposed regulations through a web-generated form letter. The letter detailed support for changing existing regulations to provide consistency with the Health and Safety Code and to remove ambiguity and clearly define the authority of the Department to authorize SEPs. Commenters stated their belief that the proposed changes are critical to protect state-authorized SEPs from bans by local ordinances.

**Commenters:** 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 124, 125, 126, 127, 128, 129, 172, 175, 194, 195, 196, 208, 209, 212, 244, 245, 246, 247, 248, 249, 250, 251, 253, 254, 256, 257, 260, 261, 263, 264, 265, 266, 267, 268, 269, 270, 271, 277, 278, 279, 282

- 2) **Comment:** Commenters stated the need for regulation changes to address the challenge of starting and operating SEPs in communities with elected officers who do not view SEPs as a viable public health strategy. Commenters also supported the need to establish SEPs in communities with increased vulnerability for infectious disease and fatal opioid overdoses.

**Commenters:** 210, 225, 252, 275, 289

- 3) **Comment:** Commenters expressed that the operation of SEPs should not be stymied by local politicians making decisions based on politics instead of public health best practices.

**Commenters:** 289, PH11, PH14, PH15, PH16, PH18, PH20, PH21, PH22, PH24

- 4) **Comment:** Commenters expressed that having local authorities, such as counties and cities, oversee SEPs causes confusion as it contradicts state law. Concern was raised that “infectious diseases do not recognize county borders.”

**Commenters:** 289, PH11, PH14, PH15, PH16, PH17, PH18, PH19, PH20, PH22, PH24, PH26.

**Response to #1 - #4:** The Department appreciates the indication of support for adoption of the proposed regulations.

- 5) **Comment:** Commenters expressed that local authorities, such as counties and cities, should have the right to ban syringe services and stated the proposed regulations are an overreach by the state and bad public policy. Commenters stated that the state is attempting to remove power from local authorities and that the state is not aware of needs and desires of people at the local level.  
**Commenters:** 110, 122, 130, 131, 133, 134, 135, 136, 138, 139, 140, 141, 142, 143, 144, 145, 147, 148, 152, 153, 154, 155, 157, 158, 159, 160, 161, 162, 164, 165, 166, 167, 169, 173, 176, 177, 178, 180, 181, 182, 183, 184, 185, 186, 188, 189, 191, 192, 193, 197, 198, 199, 200, 205, 206, 207, 211, 213, 214, 215, 216, 217, 218, 221, 222, 223, 224, 227, 230, 234, 237, 238, 239, 240, 242, 243, 255, 258, 262, 272, 273, 274, 276, 280, 281, 283, 284, 286, 287, 288, 290, PH2, PH3, PH5, PH6, PH8, PH9, PH10, Muni1, Muni2, Muni3, Muni4, Muni5, Muni6, Muni7, Muni8, Muni9, Muni10, Muni11, Muni12, Muni13, Muni14, Muni15, Muni16, Muni17, Muni18, Muni19
- 6) **Comment:** Commenters stated that the Department does not understand the intent of AB 604 or the Health and Safety Code and that that making these changes to the regulations is beyond the legal authority of the Department. Commenters stated that the Department's interpretation of Health and Safety Code 121349(c) as preempting all local ordinances and land use decisions related to SEP operations is unreasonable and inconsistent with state law. Commenters stated that if the proposed regulations were to be approved, they would be challenged in court and overturned.  
**Commenters:** 143, 239, 242, PH1, PH3, PH5, PH7, PH12, Muni1, Muni2, Muni3, Muni7, Muni8, Muni11, Muni13, Muni15, Muni17, Muni18
- 7) **Comment:** Commenter stated that by reducing the public comment period from 90-days to 45-days, the Department is needlessly reducing the opportunity for public comment.  
**Commenters:** Muni18

**Response to #5 - #7:** The Department is moving forward with the proposed regulations to remove ambiguity and clearly define the authority of the Department to authorize and oversee state-authorized SEPs notwithstanding any other law. The proposed changes will also bring the regulations into compliance with the change to the length of the public comment period for SEP authorization made by Assembly Bill (AB) 1810 (Committee on Budget, Chapter 34, Statutes of 2018).

AB 604 (Skinner, Chapter 744, Statutes of 2011) gave authority to the Department to authorize, as specified, certain entities to provide syringe exchange services in any location where the Department determines that the conditions exist for the rapid spread of HIV, viral hepatitis, or any other potentially deadly or disabling infection spread through the sharing of used hypodermic needles and syringes. The Department's Office

of AIDS, Office of Viral Hepatitis Prevention and the Centers for Disease Control and Prevention (CDC) have determined that all counties in California are at such risk.

Prior to the passage of AB 604, only local governments had the authority to authorize SEPs. HSC 121349(b) defines local authority and HSC 121349(c) defines the state authority. HSC 121349(b) and 121349(c) delineate separate processes for SEP authorization.

CCR, Title 17, Section 7002(a)(13)(A) defines one of the steps for state-authorized applicants. It states that SEP applicants must provide a signed statement attesting to “compliance with state laws, regulations and local ordinances.” Section 7014 states “the program and its staff shall operate and furnish services in compliance with all applicable state laws, regulations and local ordinances.” CCR, Title 17, Section 7002(a)(13)(A) and Section 7014 should not have included “local ordinances” as part of the regulations, as HSC 121349(c) does not contain this requirement.

This change will amend CCR, Title 17, Section 7002(a)(13)(A) and 7014 by removing the words “local ordinances.” It will not prevent local governments from authorizing applicants to provide syringe services in their jurisdictions, nor will it impose additional requirements on local governments or locally-authorized SEPs. This change also will not impermissibly expand the Department’s authority beyond what is already authorized by statute. Rather, it will allow the Department to approve applicants based on compliance with the requirements set forth in HSC 121349 and on state priorities for public health and communicable disease control.

- 8) **Comment:** Commenters stated that the change will mislead SEPs into believing that local laws will not apply to their programs and will waste resources in establishing programs that may later be shut down by local ordinances.

**Commenters:** Muni2, Muni11(copied from Muni 2)

**Response to #8:** The Department has received no indication that SEPs will be confused by the proposed regulations, and no SEP expressed this concern. In contrast, SEPs have expressed strong support for this regulatory change. The consensus among SEPs is that the removal of reference to unspecified local ordinances will clarify current law. The Department believes the proposed regulations meet the “clarity” standard of the Administrative Procedure Act as they are consistent with the authorizing statute, which is silent on local ordinances.

- 9) **Comment:** The commenters oppose the proposed regulations and stated that if the Department wants to allow SEPs, then the Department should operate the SEPs, not local entities.

**Commenters:** 136, 235

- 10) **Comment:** Commenters stated that SEPs and/or harm reduction services are not useful public health interventions. Commenters stated SEPs increase drug use in their communities and enable people who use drugs.  
**Commenters:** 110, 122, 123, 130, 134, 135, 136, 138, 143, 145, 146, 147, 148, 149, 150, 151, 152, 156, 157, 161, 163, 167, 170, 171, 174, 178, 179, 180, 181, 184, 185, 186, 189, 191, 197, 199, 201, 202, 204, 205, 206, 213, 214, 217, 218, 219, 221, 222, 223, 224, 226, 227, 229, 231, 232, 233, 234, 236, 237, 243, 259, 262, 272, 276, 281, 283, 284, 288, PH2, Muni7, Muni13, Muni16
- 11) **Comment:** Commenters stated that SEPs and/or harm reduction services are critical public health interventions that support people who use drugs with dignity and respect. Commenters also stated SEPs are excellent at assisting people who use drugs in accessing needed services including treatment for substance use disorder.  
**Commenters:** 285, 289, PH17, PH18, PH20, PH21, PH22, PH23, PH24, PH25, PH26
- 12) **Comment:** Commenters stated their concerns regarding public safety, stating that SEPs cause increased crime in their communities, bring unhoused people from neighboring communities, and place people at risk for accidental needle-stick injuries in public spaces.  
**Commenters:** 122, 123, 130, 132, 134, 135, 136, 138, 141, 143, 144, 145, 148, 149, 154, 156, 163, 166, 167, 171, 178, 182, 184, 189, 205, 206, 213, 214, 217, 219, 221, 222, 223, 224, 232, 233, 236, 237, 259, 262, 272, 276, 281, 283, 284, PH2, PH3, PH4, Muni4, Muni6, Muni8, Muni10, Muni12, Muni13, Muni16
- 13) **Comment:** Commenters stated that SEPs are a public nuisance, have a negative impact on the environment and are the cause for syringe litter in their communities, primarily around encampments of unhoused people located in public parks and near waterways.  
**Commenters:** 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 146, 148, 218, 234, 238, 255, 276, 281, 283, 284, 286, 287, 288, PH3, PH4, PH5, PH6, PH13, Muni4, Muni8, Muni9, Muni10, Muni12, Muni13, Muni16, Muni17
- 14) **Comment:** Commenters stated that their community has no public health issues regarding infectious diseases (HIV, viral hepatitis) and/or opioid overdoses. They expressed their desire to have public health focus on COVID vaccinations and re-opening of schools.  
**Commenters:** 142, 145, 147, 148, 156, 174, 235, 243
- 15) **Comment:** Commenter does not want an SEP in their community and/or is generally opposed to DPH-18-015.  
**Commenters:** 168, 187, 190, 203, 220, 228

16) **Comment:** Commenters expressed opposition to a pending assembly bill, AB 1344 (Arambula).

**Commenters:** 132, 135, 142, 144, 145, 148, 183, 236, 284, 286, PH1

**Response to items #9-16:** While many commenters raised other issues related to SEPs, these comments do not relate to the contents of this rulemaking and are not in scope. The proposed regulations do not provide new authority for SEPs or for the Department. Rather, they resolve an inconsistency between the Department's regulations and the authorizing statute, which sets out the two separate processes for SEP authorization.

HSC 121349(c) provides a clear process for state authorization of an SEP without any requirements related to local law. The law provides:

“In order to reduce the spread of HIV infection, viral hepatitis, and other potentially deadly bloodborne infections, the State Department of Public Health may, *notwithstanding any other law*, authorize entities that provide services set forth in paragraph (1) of subdivision (d), and that have sufficient staff and capacity to provide the services described in Section 121349.1, as determined by the department, to apply for authorization under this chapter to provide hypodermic needle and syringe exchange services consistent with state standards in any location where the department determines that the conditions exist for the rapid spread of HIV, viral hepatitis, or any other potentially deadly or disabling infections that are spread through the sharing of used hypodermic needles and syringes [emphasis added].”

The inclusion of reference to local ordinances in CCR Title 17, Section 7002(a)(13)(A) and Section 7014 in the 2014 regulations has created a direct conflict with HSC 121349(c) and had the effect of subverting the Legislature's stated intent of enabling the state to authorize SEPs meeting the requirements of the statute. The purpose and scope of this regulation package is to address that regulatory inconsistency.

17) **Comment:** Commenters stated concerns via the chat feature during the hearing regarding the public hearing: time for speakers was too short, speakers were cut off when time expired, could not see “the committee hearing officers.”

**Commenters:** PH1, PH5

**Response to items #17:** The Department acted within the rules set forth for a public hearing. Due to the number of attendees, the Department announced at the beginning of the hearing that each speaker would have three minutes to speak and could submit additional comments through the Department's Office of Regulations. The public was made aware that lines would be muted at the end of three minutes. No participants or Department staff had video enabled during the hearing.

18) **Comment:** Commenters alerted the Department that the date for the close of public comment in the California Regulatory Notice Register 2021, No. 8-Z, p. 192 was May 6, 2021 and was listed in the announcement posted on the Department's website as April 5, 2021.

**Commenters:** 241, 216

**Response to item #18:** The Department corrected the date for the close of public comment in all announcements and on all platforms.

19) **Comment:** Commenter submitted a list of questions for the Department outside the scope of the public comment for this regulations package.

**Commenter:** 216

**Response to Item #19:** The Department provided the commenter with the link to the Department's Public Records Request (PRA) Portal. The commenter submitted PRA# P012233-031821 on March 18, 2021. The PRA was responded to and closed on 4/2/2021.

### **APPENDIX ONE**

List of commenters who submitted written comment via email, electronic form, or postal mail.

- 1 Carl Baker
- 2 David Jay
- 3 Libby Guthrie
- 4 Tara Stamos-Buesig
- 5 Anita Ramirez
- 6 Jenna Haywood
- 7 Savannah O'Neill
- 8 Tia Paneet
- 9 Timothy Zembek
- 10 Ryan Clary
- 11 Lorie Violette
- 12 Miriam Thompson
- 13 Terri Reynolds
- 14 Lasara Allen
- 15 Liane Bruckstein
- 16 Stacey Dee
- 17 Raphaela O'Meara
- 18 Mahan Naeim
- 19 Petra Reyes
- 20 Sarah Whipple
- 21 Lynell Clancy
- 22 Lo Petty



23 Braunz Courtney  
24 Oriana Farrier-Nolan  
25 Kenneth Beasley  
26 Abby Hyland  
27 Andrew Lottinger  
28 Kate Garrett  
29 Makena Starner  
30 Gabrielle Kelly  
31 Brandy Lara  
32 Hannah Lippe  
33 Denise Elerick  
34 Cheryl Kupras  
35 Sarah Kerr  
36 Melina Machuca  
37 Chase Morgan  
38 Dallas Blanchard  
39 Laura Guzman  
40 Brendan O'Connell  
41 Andy Kelly  
42 Dani Drysdale  
43 Michelle Tabajonda  
44 David Monticalvo  
45 Buffey Bourassa  
46 Sarah Cushman  
47 Caroline McGuire  
48 Miranda Klinck  
49 Sarah Kerr - Open Door  
50 Erin Augustine  
51 Juliana Blodgett  
52 Katie Quijada  
53 Dr Phillip Summers  
54 Adam Viera  
55 Dani Behonick  
56 Hannah Lippe  
57 Annunziata van Voorene  
58 Haden Smiley  
59 Dahlia Ferlito  
60 Sydney Cooke  
61 Erin McQueen  
62 Jessica Smith  
63 Alexandra Mesropov  
64 Penny Morris  
65 Mary Louise Hawkins  
66 Joe O'Neill  
67 Renee Lahey

68 Madelyn Frank  
69 Katherine Rosecrance  
70 Nicole Carbonel  
71 Micheal Banacky  
72 Susan Wilson  
73 Catriona Lewis  
74 Denise Lopez  
75 Libby Guthrie  
76 Lauren Kennedy  
77 Rob S.  
78 Dallas Augustine  
79 Laura Pineda  
80 Alan Shu  
81 Joubin Khazaie  
82 Cyrus Oloumi  
83 Brianna Patti  
84 Irene Masini  
85 Harwant Khehra  
86 Clare D.  
87 Yolanda Chavez  
88 Lauren Coomber  
89 Natasha Rastegari  
90 Serena Tally  
91 Siana Sonoquie  
92 Yamini Patibandla  
93 Hilary Crosby  
94 Anvesh Macherla  
95 Jean Plaza  
96 Michael LoBasso  
97 Faisal Omar  
98 Michelle Au  
99 Madeleine Hart  
100 Lesa Jara  
101 Neeki Amirjavadi  
102 Leila Yousefi  
103 Evelyn Zermeno  
104 Mahan Naeim  
105 Natasha Vanderhoof  
106 Luis Reyes Romo  
107 Ryan Wythe  
108 Travis Frampton  
109 Joyce Adams  
110 Kate Copeseeley  
111 Cyrus Kiani  
112 Natassia Dunn

113 Kyle Johnson  
114 Neema Tabarani  
115 David Borjon  
116 Molly Greenberg  
117 Cyndi Blackman  
118 Gianni Caponera  
119 Paulina Torres  
120 Sofia Laguna  
121 Ashley Doherty  
122 Jeff Oster  
123 Penny Poole  
124 Erin Cantrell  
125 Rupert Reyneke  
126 Cassie Jewell  
127 Joshua Wilson  
128 Gabriella Alvarado  
129 Ashley Rollerson  
130 Amy Wheeler  
131 Melanie Whelche  
132 Steve Hicklin  
133 Effie Hale  
134 Michelle Reutlinger  
135 Kathi Whiteley  
136 Peggy Hicks RN  
137 Nancy Doherty  
138 Jeff Oster  
139 Judy Sousa  
140 Ray Dwyer  
141 Lanita Fedorchuk  
142 Lanita Fedorchuk  
143 Robert Berry  
144 Robert Berry  
145 Larry Coleman  
146 Laura Morris  
147 Jessica Montgomery  
148 Nichole Nava (Louis)  
149 Sandra Lee  
150 Joni Hendrickson  
151 Lara Longo  
152 Scott Evans  
153 Ron Ostarello  
154 Beth Reimers  
155 Chris Crutchfield  
156 Jenn Spring  
157 Cheryl Ballantyne

158 Linda Anderson  
159 Michelle Anchordoguy  
160 Heidi Lecair  
161 M Hall  
162 Genzoli  
163 Delilah Ackley  
164 Suzanne Wasilchen  
165 Les Heringer  
166 Christopher Price  
167 Robert Sheridan  
168 Joan Gillette  
169 Gina Bax  
170 JR Gonzal  
171 Brooke Baker  
172 Timothy Zembek  
173 Sherry Smith  
174 Ted Bryson  
175 Lydia Bransten  
176 Jackie Uttecht  
177 Susan Lance  
178 Laura Willman  
179 Stephanie Contreras  
180 John S. Wichman  
181 Patty Grace McKee  
182 Brad Hall  
183 Darryl Brock  
184 Marci Pittman  
185 Laurie Wandtke  
186 Greg Foutz  
187 Jackie Roberts  
188 Steve Kramer  
189 Carolyn DeHart  
190 Roxane Atkinson  
191 Karyn Glasgow  
192 Mark W. Smith  
193 Jennifer Davis  
194 Candace Winstead  
195 Sandi Clement  
196 Katie Taylor  
197 Jean Stevenson  
198 Leslie Carbah  
199 D. Lunsford  
200 Suzanne Campbell  
201 Gloria Lees  
202 Chris Fogleman

203 Laurie Souza  
204 Christopher Martin  
205 Sergio Martinez  
206 Jeff Stephens  
207 Karin Willhoit  
208 Ricky Bluthenthal  
209 Barrot Lambdin  
210 Victoria Proctor  
211 Kelly Moakley Freer  
212 Amy Lieberman  
213 Scott McClarrinon  
214 Maria Ball  
215 Colleen Waugh  
216 Robert Berry  
217 Rachel Colon  
218 Phyllis Sandy  
219 F.W. Zanker  
220 Denise Centeno  
221 Becca Woodward  
222 Pat and Kathy Reilly  
223 Zac Repka  
224 Chistine Daugherty  
225 Denise Elerick  
226 Steve Jordan  
227 JeffBowers  
228 SusanMicheli  
229 Charles and Tyra Dickinson  
230 Debbie Baggett  
231 Shannon Danna  
232 Dorinda Matney-Scofield  
233 Patti Tucker  
234 Nadine Waeghe  
235 Peggy Hicks  
236 Susan Smead  
237 Kristin Tupen  
238 Ben Larson  
239 Stephanie McKenzie  
240 Sylvia Douglas  
241 Leonie Mulvihill  
242 Brian Ring  
243 Deborah Byrd  
244 Noah Geraci  
245 Stephanie Haynes  
246 Monique Tula  
247 Kimberly Sue MD PhD

248 Annel Matias  
249 Taeko Frost  
250 David Kilburn  
251 Jose Martinez  
252 Yuba-Sutter Healthcare Council  
253 Lois Petty  
254 Ali Lazarus  
255 Les Heringer  
256 Sara Blawski  
257 Bekki Lee  
258 Jeff Stephens  
259 Catherine Szabo  
260 Daniela Wotke  
261 Cyndi Dawson  
262 Marci Pittman  
263 Roxanne Baker  
264 Lindsay Briggs  
265 Chiara Ferrari  
266 Nicole Mouer  
267 Yanira E Quiñones Garcia  
268 Lisa Currier  
269 Robert Van Fleet  
270 Linda Cartier  
271 Elliot Nathan  
272 Jody and Jon Taylor  
273 Marvin G. Timbol  
274 Michelle Costantine Blackwell  
275 Craig Pulsipher  
276 Colleen Waugh  
277 Christine Leistner  
278 Sonja Albin  
279 Carolina Lopez De la Torre  
280 Orville Chamber of Commerce  
281 Coleen Morris  
282 Annunziata van Voorene  
283 Judy Sousa  
284 Kirby White  
285 Unknown  
286 Gary Lewis  
287 Argelis Lewis  
288 Phyllis Sandy  
289 Network for Public Health Law  
290 Joel Joyce

Public Hearing – April 14, 2021

PH1	Rob Berry
PH2	Kami Denlay
PH3	James Gallagher
PH4	Judy Sousa
PH5	Andrew Coolidge
PH6	Jeff Stephens
PH7	Walt McNeil
PH8	Karm Bains
PH9	Gary Lewis
PH10	Kim Bergel
PH11	Madeleine Clyde
PH12	Chris Branscum
PH13	Chrissie Breton
PH14	Jasmine Guerra
PH15	Carol Newark
PH16	Jessica Smith
PH17	Wesley Saver
PH18	Laura Thomas
PH19	Robyn Learned
PH20	Charles Hawthorne
PH21	Denise Elerick
PH22	Amy Lieberman
PH23	Tara Stamos-Buesig
PH24	Jenna Haywood
PH25	Amber Sheldon
PH26	Annina Van Voorene

Municipalities and Elected Officials

Muni1	Butte County (Mailed to CDPH)
Muni2	League of California Cities and Rural County Representatives of California (Emailed in by ddolfie@cacities.org)
Muni3	City of Anaheim (Faxed to CDPH)
Muni4	City of Oroville (Mailed to CDPH)
Muni5	City of Wheatland – Proclamation (Emailed to Office of Regulations (OOR) by kgiurbino@wheatland.ca.gov)
Muni6	County of Yuba – Resolution (Emailed to OOR by jcyang@CO.YUBA.CA.US)
Muni7	Oroville City Councilman (Emailed to OOR by dpittman@cityoforoville.org)

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Muni8 Assembly Member 3rd District – (Emailed to OOR by  
Assemblymember.Gallagher@assmbly.ca.gov)  
Muni9 City of Biggs – (Emailed to OOR by Mark@biggs-ca.gov)  
Muni10 City of Yuba City – (Emailed to OOR by mboomgaarden@yubacity.net)  
Muni11 City of Eureka – (Emailed to OOR by mslattery@ci.eureka.ca.gov)  
Muni12 City of Red Bluff – (Emailed to OOR by rcrabtree@cityofredbluff.org)  
Muni13 City of Santa Ana – (Emailed to OOR by DSoto@santa-ana.org)  
Muni14 Glenn County – (Emailed to OOR by SDeMoss@countyofglenn.net)  
Muni15 Town of Paradise – (Mailed to CDPH)  
Muni16 City of Marysville – (Emailed to OOR by bbuttacavoli@marysville.ca.us)  
Muni17 County of Santa Cruz – (Emailed to OOR by  
Caitlin.Smith@santacruzcounty.us)  
Muni18 City of Costa Mesa– (Emailed to OOR by  
ALEXANDER.GONZALEZ@costamesaca.gov)  
Muni19 Placer County – (Emailed to OOR by JJoyce@placer.ca.gov)