



# Sierra Club Loma Prieta Chapter

## Celebrating 80 years of protecting the planet

3921 East Bayshore Road, Suite 204, Palo Alto, CA 94303  
loma.prieta.chapter@sierraclub.org | TEL - (650) 390-8411 | FAX - (650) 390-8497

June 9, 2015

Chair Kremen and Board of Directors  
Santa Clara Valley Water District  
5750 Almaden Expressway  
San Jose, CA 95118

**RE: Engineer's Report Reminds of Need for Study of Santa Clara County Fluoridation Project**

Dear Santa Clara Valley Water District Chair Kremen and Members of the Board,

The Sierra Club's concerns about fluoride in drinking water still have not been addressed in any meaningful way for the multiple projects currently underway to fluoridate water in Santa Clara County. Quotes from the Sierra Club Policy on Fluoride in Drinking Water (attached) are included below, followed by highlights from comments our Loma Prieta Chapter Water Committee has made about this project in the past.

1. "[T]he Sierra Club believes that communities should have the option to reject mandatory fluoridation of their water supplies."
  - Ethically, we see significant issues with delivering non-pharmaceutical products to provide dental health treatment without "informed consent," and we think public health organizations such as the Health Trust and the County of Santa Clara Department of Public Health should also deeply consider the ethics of this practice.
  - At least, the public should be allowed to vote to see if a majority want dental health care delivered through drinking water (such a vote happened recently in Portland Oregon).
2. "If fluoride is added to municipal water supplies, sodium fluoride rather than flourosilicate compounds should be used because the latter has a greater risk of being contaminated with such heavy metals as lead and arsenic."
  - Hydrofluorosilicic Acid is more toxic than any other chemical currently added to our drinking water. Employees will need to wear hazmat suits to work with it and spills can be extremely harmful to the health of humans and other organisms.
  - This chemical also tends to erode equipment and therefore incur higher maintenance and replacement costs. Some communities have recently discontinued their fluoridation programs due to these high costs. No public documents about the Santa Clara County projects have mentioned this. Operations and maintenance costs, as well as environmental impacts, have not been addressed.
3. "Before a water supply is fluoridated, there should be a local assessment of the impact on affected aquatic ecosystems."
  - The local Sierra Club Chapter has relied extensively on this part of our policy to advocate for some kind of analysis of impacts and/or benefits related to the drinking water fluoridation

project. Most significantly, we commented that the California Environmental Quality Act (CEQA) exemption filed for the project was insufficient and incomplete.

- As with the Engineers Report, the CEQA project description included only equipment to be installed and no information or analysis about the use of this new highly toxic chemical in the water treatment process. This relates to our comment about operations and maintenance above.
  - The Rinconda Treatment Plant Upgrade Environmental Impact Report provided some information about the operations that could serve as a basis for a real project description including all aspects of the project from transportation to how traces in wastewater affect the residue from the purification.
4. "To protect sensitive populations, and because safer strategies and methods for preventing tooth decay are now available, [Sierra Club policies] recommend that these safer alternatives be made available and promoted."
- The Loma Prieta Chapter has repeatedly advocated for an in-depth study of the effectiveness of fluoridation for the target communities. No similar studies exist and the progression of implementation in our county provides the perfect situation to compare and contrast outcomes and alternatives.
  - Our Water Committee has the expertise to help perform a study and we would be pleased to participate in the development and implementation of such a seminal research project.
5. Equitable costs for fluoridation is not included in the Sierra Club policy but in general the public should not be charged for optional drinking water treatments without their consent. Especially those who are not receiving the water with this supposed benefit should not be charged for a product they are not receiving. Additional public information should be provided about the costs of this program and how they will be distributed among customers covered by the fluoridation projects.

We attached one of our previous communications on the possible environmental impacts of fluoridation. Other communications will be provided upon request. We appreciate your unbiased consideration of our input and deep consideration of the ethical issues.

Respectfully Submitted,



Katja Irvin, AICP  
Chair, Water Committee  
Sierra Club Loma Prieta Chapter

Enclosures: 2

CC:

Health Trust of Santa Clara County CEO and Board of Directors  
County of Santa Clara Department of Public Health Officer, Sara Cody  
County of Santa Clara, Health Care Program Manager, Anandi Sujeer  
San Jose Mercury News Editors  
Paul Rogers, San Jose Mercury News