December 17, 2012

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

Re: Fluoridation Ad Hoc Committee Recommendation (December 18, 2012; Item 2.1)

Dear Chair LeZotte,

The Sierra Club Loma Prieta Chapter and the national organization are generally concerned about fluoridation of drinking water. The Sierra Club’s Policy on Fluoride in Drinking Water is attached for your information.

We regret that we have not previously commented on Santa Clara Valley Water District Interpretation Strategy E-2.3.1.2 to provide fluoridated drinking water at the District’s three water treatment plants and the Campbell Well Field. However, we hope is not too late to inform the Board of Directors of possible human health and environmental issues related to fluoridation, and to ask the District to deeply consider and analyze all the impacts, benefits, and alternatives to fluoridating drinking water.

Several main points in the Sierra Club policy are relevant:

- “... the Sierra Club believes that communities should have the option to reject mandatory fluoridation of their water supplies.” This is not a trivial decision to spend $6.6 million to benefit dental health. The public should have the opportunity to be fully informed about the costs and benefits of such a program and there should be a countywide vote (referendum/measure) to get community approval before moving forward with this program.
- “To protect sensitive populations, and because safer strategies and methods for preventing tooth decay are now available, we recommend that these safer alternatives be made available and promoted.” A cost-benefit analysis should be conducted to evaluate the positive and negative impacts on human health and natural environments, compared to the costs of this program and the costs and benefits of alternative programs to improve dental health.
- “Before a water supply is fluoridated, there should be a local assessment of the impact on affected aquatic ecosystems. This assessment should examine background fluoride levels and estimate what the levels will be after fluoridation. It should also assess the effect of this increased fluoride on downstream aquatic ecosystems.” We urge the District to do such analysis as part of a larger cost-benefit analysis of this fluoridation project.

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More specifically, if the community does choose fluoridation:

- “sodium fluoride rather than fluorosilicate compounds should be used because the latter has a greater risk of being contaminated with such heavy metals as lead and arsenic”
- “The Sierra Club recommends lowering the maximum contaminant level of fluoride in drinking water from the present 4mg/L to a level shown not to harm aquatic ecosystems or human health.”

Thank you for considering our position and doing the proper analysis to know that you’re making the right decision for the community and the environment.

Sincerely,

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

Enclosure (1)

Cc: Mike Ferreira, Loma Prieta Chapter Conservation Chair
Clerk of the Board, Santa Clara Valley Water District
Sierra Club Conservation Policies

Policy on Fluoride in Drinking Water

The Sierra Club recommends lowering the maximum contaminant level of fluoride in drinking water from the present 4mg/L to a level shown not to harm aquatic ecosystems or human health. [National Research Council, Fluoride in Drinking Water: a Scientific Review of EPA's Standards, March 2006]

The Sierra Club understands the historic reason that fluoridation of public water supplies has been promoted and that it may have been historically justifiable (162 million people get fluoride added to their municipal water supply at the recommended level of 0.7-1.2 mg/L). There are now, however, valid concerns regarding the potential adverse impact of fluoridation on the environment, wildlife, and human health.

Therefore, the Sierra Club believes that communities should have the option to reject mandatory fluoridation of their water supplies.

To protect sensitive populations, and because safer strategies and methods for preventing tooth decay are now available, we recommend that these safer alternatives be made available and promoted. If fluoride is added to municipal water supplies, sodium fluoride rather than fluorosilicate compounds should be used because the latter has a greater risk of being contaminated with such heavy metals as lead and arsenic.

Before a water supply is fluoridated, there should be a local assessment of the impact on affected aquatic ecosystems. This assessment should examine background fluoride levels and estimate what the levels will be after fluoridation. It should also assess the effect of this increased fluoride on downstream aquatic ecosystems.

Board of Directors, June 19, 2008