

Written comment by Safewater Coalition

Please document below entire written comments for the public record of Addendum to Mitigated Negative Declaration

Topic—Health concerns

Health 1. What is the level of Trichloroethane(TCE), Tetrachloroethylene(PCE), Perchlorate, and nonylphenol in the current SBSA recycled water?

Health 2. Where is the documentation of a body of compelling evidence in peer reviewed scientific literature showing the absence of adverse effects on the health of humans (who are using recycled water on playgrounds and landscaping)? Absent a body of compelling negative evidence for adverse effects, use of recycled water for residential purposes would constitute an EXPERIMENT. If such an experiment is indeed needed, the Precautionary Principle should point to the safest route? Namely for non-residential purposes and where human-exposure is minimized such as industrial landscaping.

Health 3. To what extent has the recycled water been characterized for unregulated chemicals (chemicals of unknown toxicological consequences)? What type of characterization has Redwood City done on this water? Only regulated chemicals? If not, which of the many unregulated substances have been characterized?

Health 4. If the SBSA recycled water has undergone a chemical evaluation, how Extensive is the characterization compared with the water produced by a water district that produces water that has been extensively characterized?

Health 5. What is the city doing to eliminate estrogens in the water?

Health 6. If previously unidentified illnesses start to crop up in several years – how is the city going to address lawsuits?

Health 7. After using recycled water for 5 to 10 years, for example, in highly impermeable clay soil, like that which exists in Redwood City, what kinds of plant species will no longer be able to grow? What is the ultimate effect and solution?

Health 8. Many problems of toxicity or pollutants arise only after many years have passed, for example DES – given to pregnant women for 40 – 50 years, has been found to cause birth defects and the more contemporary problem of MTBE as a gas additive. Do we have to take the risk, however small it might be perceived to be by forcing recycled water on residents or can we find a way to use recycled water on industrial properties and still make the project viable over time? This will give us more time to research all these other issues.

Health 9. What about pharmaceuticals in wastewater-how are these accounted for? There is some concern that water regulations and water quality standards do not address pharmaceuticals found in the water system. Water sampling has shown levels in California as high as 70% for certain chemicals. The technology to address some of these small concentrations is finally

available but the Department of Health Services (DHS) has not yet addressed pharmaceuticals. DHS is concerned about pharmaceuticals in wastewater intended for potable uses (drinking water uses), not non-potable uses. The water use proposed here is for non-potable use. DHS is looking into recycling unused/unwanted pharmaceuticals so that they do not enter the water system. The legislature has passed laws to prevent facilities that use large amounts of drugs from disposing of them in the sewer system. Trace amounts of drugs, pesticides, and chemicals from household products that still remained in our treated sewage. Antibiotics that end up in recycled water could potential introduce antibiotic resistant bacteria into our environment. Children, pregnant women, and those with immune deficiencies are especially vulnerable and should not have contact with recycled water. They may be more at risk from pharmaceuticals.

Health 10. Have there been any health-related lawsuits associated with the use of recycled water both for non-potable recycled water and potable recycled water, including those lawsuits that have settled, or those lawsuits that have failed, but have been appeal.

Health 11. What is the level of NDMA, THMs, Estrogens, and Antibiotics in the SBSA? Safewater Coalition would like to request that SBSA test for **NDMA, THMs, Estrogens, and Antibiotics** even though the promoters of recycled water believe is at low concentration, and has no health risks? Can any of the health experts guarantee here tonight (both short term and long term) that there are no health impacts(known or unknown) from estrogens in SBSA's recycled water?

Health 12. Has any research been conducted on the health impacts of using recycled water for non-potable use? What about the unregulated compounds found in treated wastewater? And based on DHS Title 22 Regulations, SBSA is not removing all unregulated compounds? If SBSA is aware of these "unregulated chemicals", then what has been done to test and remove them?

Health 13. Could the health effects associated with exposure to recycled wastewater be delayed? Am I going to get sick 30 years from now?

Health 14. The irrigation of a golf course in Australia using recycled wastewater resulted in the emergence of a microbacteria and an associated skin condition(Skin Ulcer). Can any of the health experts guarantee here tonight that the above condition will not happen to our Redwood City residents both short and long term?

Health 15. Renowned health experts on both sides at the September 16th panel acknowledge that there are so many unregulated substances in the water that can potentially create health issues just from airborne exposure alone. What are you doing to prevent this?

Health 16. Most people who favor treated effluent say it is safe, and that it has been used for a long time in various places which is true-- but not in residential front yards. If we do use treated effluent in Redwood Shores, and residents are diagnosed with cancer, is anyone going attempt to determine the cause of their cancer to see if treated effluent could be one of the causes? If DHS (Department of Health Services) cannot determine whether or not the cause is treated effluent, then how can you say it is safe? There have not yet been enough people living with treated effluent in their environment?

Health 17. At the September Public Forum, your panelist from Department of Health, Bob Hulquist, was asked if anyone was planning to attend the workshop of the Association of California Water Agencies on the dangers of pharmaceuticals in water. He said, "No, because the threat is not there." If the threat is not there why did 200 Water Quality Professionals, Policy

Makers, Consultants and Regulators attend that workshop and why do the Water Environment Research Foundation, and the American Water Works Association Research Foundation also have workshops and ongoing projects studying this danger?

Health 18. I am a nurse and I know that the parasites *giardia* and *cryptosporidium* are highly contagious and pregnant women, children, and those with immune deficiencies are at risk of contracting a water-borne illness. It was mentioned at the September 16 Panel that these parasites have been found in water in the Lake Tahoe Area and that they are of concern as they are resistant to the traditional disinfectants such as chlorine. That means they are not removed from treated effluent. Why was the mention of this current danger, so close to us, edited out of the transcript at that meeting?

Health 19. Does SBSA treated effluent contains chemically treated SEWAGE?

Topic—Costs issues

Cost 1. How much will this Redwood City's Proposed Recycled Water Project costs, and who will pay for it? We have asked this question a number of times?

Cost 2. The State budget is in shambles. We're in a down economy, there are a lot of "hard working" citizens and seniors who are just making ends meet. You've already proposed a water rate increase. You've already approved salary increases for the City Clerk and the City Attorney. Other "small" random increases appear to be on the way to meet future shortfalls.

So despite these conditions, why are we embarking on a \$40 million dollar project that will only result in more increases in our water rates? Do you really want to keep increasing our "taxes" to pay for a \$40 Million dollar treated effluent project that your Redwood Shores neighbors are opposed to and that other Redwood City residents will "subsidize". Who's really benefiting from this?

Cost 3. Why are we continuing to spend large sums of money to consider spending another \$40 million dollars on a treated effluent project that those expensive Kennedy Jenks consultants and city staff say will increase our water rates by another 6 to 8%? Where is the city getting all this "money" from?

For example, why did the city spend \$50,000 of our tax money for yet another "Public Perception PR firm" to ram "treated effluent" down our throats? We already pay for a full-time PR Manager and we have a Public Works Director promoting treated effluent. If treated effluent is so good, so safe, why do you need to spend \$50,000 of our tax dollars to convince us? Safewater Coalition would like to ask the City NOT to use another \$50,000 PR Firm so to ask our residents to accept any kind/level of risks of this treated wastewater .

Cost 4. On Peter Ingram's 11-18-2002 Status of Proposed Recycled Water Project website, what really bothers me is the "**State Grant Loan Application**" **nearly complete**? Isn't the process reverse here? I would rather see this loan application process move forward if our Council Members still decide to go ahead with treated effluent in March, not before the final vote. Once again, so the same question goes back to it is it likely that a treated effluent project can be financed without a Mandatory Connection Ordinance. Would you loan money without knowing there would be subscribers? Wouldn't you expect taxes to increase on a \$40M project?

Cost 5. How can the \$40M dollar cost of the project really be justified when you are not piping the water to the users who really want it? In an average week, all the city's golf courses and industrial users use more water than Redwood Shores neighborhoods do in irrigation. So why are we 'forcing' Redwood Shores residents to uptake treated effluent in our residential neighborhood. Why don't we pipe it to the people who want it and permanently keep it out of our areas and reduce the costs to all of Redwood City?

Topic---Real Intent of Treated Effluent

Intent 1. Is it true that the developers want this project to go through and are willing to kick in anywhere from an additional \$7 to 10 million just to see this project go through? Why would they really want to do that? Where's the money trail here?

Intent 2. Safewater Coalition is willing to accept recycled water as long as is treated to the Hetch Hetchy water standards, or drinking water standards for non-indoor usage. Why can't the developers pick up the added cost on reverse osmosis when there are now more than 15,000 Redwood City residents who oppose treated wastewater. So it seems like it is the developers who really need this \$40 million recycled water project to go through, not the existing Redwood Shores residents.

Intent 3. How can the \$40M dollar cost of the project really be justified when you are not piping the water to the users who really want it? In an average week, all the city's golf courses and industrial users probably use more water than Redwood Shores neighborhoods do in irrigation. So why are we 'forcing' Redwood Shores residents to uptake treated effluent in our residential neighborhood. Why don't we pipe it to the people who want it and permanently keep it out of our areas? Give it to the Seaport users. Give it to the golf courses. Give it to the industrial users. Keep it out of my children.

Intent 4. We keep hearing that the City is over its State Water Allocation. It's also seems obvious that developers who control key land interests can not continue developing unless we "find" water. The Downtown Cinema Project and Marina Shores are among some of the projects at risk. It really appears our health concerns are being sacrificed for builders' profits and the name of growth.

Why are we considering increasing our demand on Hetch Hetchy with these new developments? If we add up all the water allocation these new developments will require and measure it against what we'll need to save in treated effluent, the math just comes out to more dependence on Hetch Hetchy and not less. What was the point of having treated effluent again? To meet our water allocation? How can you do that if you keep increasing the target?

Topic---Homeowners Association(HOA) rights and individual Homeowner's right

HOA 1. The buyers in the very few residential communities who are using treated effluent, like Irvine, knew beforehand that they were buying into a new development that comes with treated

effluent. Whereas we, the Redwood Shores homeowners, did not buy homes that came with treated effluent; you will have been forced upon us. Just change “legislature” to “council” and the famous Burke dictum, “*While the Legislature sits all our liberties are in danger*” will apply to us. Are you really willing to go against this community’s wishes?

HOA 2. I am in Real Estate, what am I supposed to tell clients who want to buy a house in Redwood Shores when they see a disclosure that their front yards are watered with treated effluent which could affect their children's health and their landscaping? When homes for sale are required to list treated effluent as a disclosure it will surely affect the property values - won't that affect property taxes and thus the service fees collected by Redwood City

HOA 3. Why continue to claim the odor of treated effluent is chlorine as if we couldn't recognize that. Loyola Marymount College students are objecting to the odor of treated effluent on their campus – don't tell me they don't recognize the smell of chlorine. Other water companies acknowledge the existence of an odor and are looking for ways to solve the problem. They are not recommending putting it in front yards where people with open windows would have to smell it at night.

HOA 4. There will always be your pro-treated effluent scientists in telling us is safe, and there will always be our sides of experts/scientists in telling us Title 22 is not adequate, and DHS is still working on drafting regulations on the emerging contaminants. So, I would like to ask you as our elected officials to take the precautionary principle when it comes down to our own front yards, and community parks. Is it so wrong to take the precautionary principle? What's at stake here? Development over my health?

HOA 5. Were dual plumbing systems mandated in all the new commercial and industrial buildings which built recently in the Shores?

Topic---Public Communication

Pub 1. Bonnie Nixon, of the hired PR firm and the September Public Forum moderator, edited the “complete transcript of 9-16-2002”. Some of us have compared our own “notes” to Bonnie Nixon’s transcript and found important information that is missing. This PR firm Council paid for created a transcript from the clipboard notes, not verbatim from the videotape of the meeting.

I am extremely concerned that anyone who did not attend the 9-16-2002 meeting and reviews Bonnie Nixon’s transcript may be misled on some issues. What are we doing to get revised minutes into the public record? It seems sneaky of council especially when this meeting was taped and not even broadcasted! It may not be the intent but it seems suspicious. When can we get a revised copy onto public record?

Pub 2. When are we going to be able to have a truly open public forum? The mayor said at the end of the 8/26 meeting that at the September public meeting all the questions anyone had would be answered. Instead, any questions asked had to fit in one of 4 categories and had to be submitted in writing before the meeting.

There was little opportunity for questions arising from a speaker’s answer or presentation. How can we ensure that we get a balanced view from future speakers? The September public forum

original panel was one sided and only fair when the Safewater Coalition was able to get 3 out of 14 speakers to the event and because the 2 landscape experts, although selected by the Water Company, were independent of any association with water companies and therefore able to give honest opinions. Many of these speakers could potentially benefit financially from the city in future work. How fair is that?

Pub 3. How does the city and Public Works department think they are going to “refine” customer relationships after trying to ride roughshod over us? – I doubt that HOA’s feel they need coordinating by someone from the Water Company, that FAQ misrepresentations, carefully choreographed and controlled public meetings with edited transcripts, and a constant barrage of patronizing propaganda are means to accomplish refinement of relationships? With this kind of treatment what can we expect from City Council?

Pub 4. Instead of more expensive consultants to bludgeon us into submission – why not hire someone to access web for all the good information there? The Water Environment Research Foundations provides a Guidance and Framework for Public Perception Projects. Had you followed their guiding 5 principals from the beginning and included public outreach and input in your decision-making, as most successful companies have, we wouldn’t be here now. What are you doing to resolve and address this mistake?

Pub 5. Regarding communication to the public, why does Peter Ingram even bother posting his new link on (WERF), article on "Endocrine Disruptors, and on going research on emerging contaminants" if none of us can download this .pdf file?

Do you know you have to be Peter Ingram, or a public agency in order to become a subscriber? I called WERF to verify, and we as individual homeowners will not be able to download any of their research, or articles unless you are Public Agency, or Water Corporation. Why does the city post links without citizens being able to download and read them. This is just misleading, making us think that so much info is accessible to us, when we can't read in details, but rather, just the subject/title.

Topic---Landscaping issues

Land 1. The revised FAQ and Answers on the Redwood City Water Company website says that the "vast majority of plants do fine with recycled water." There are 120,000 plants listed in *Royal Horticultural Society's Plant Finder*. *The Sunset Garden Book* lists 8000 plants but only 63 of them on their list of plants suitable for seaside gardens. How can Redwood City Water Department presume to know more then these highly respected sources?

Land 2. On the RC Water Company website, the revised FAQ brochure omits magnesium and boron as minerals in treated effluent. These are the same minerals, which even in small quantities, damage landscape plants and automobile finishes. It says that this etching will not occur since the sprinklers will go off at night. Is no one aware that the wind blows at night in the Shores?

Land 3. If you look at the S&P Lab water and soil analyses, it is clear that drip irrigation won’t work in the shores? How does this affect implementation?

Land 4. The City's First Step Report says the inconsistency in the changes of soil condition over a year means changes may not be water related. Of course the results are going to be inconsistent because half of the samples were taken from median strips filled with 3' of topsoil while the rest our awful soil. Soil & Plant Lab said they cannot determine if changes are water related because they aren't given water samples which they have requested.

Land 5. Your consultants say that treated effluent has been used in Golden Gate Park since the 1920's but neglect to say not in Strybing Arboretum because its great diversity of plants would be damaged and that damage is cumulative. Have any of you seen Golden Gate Park's world famous Rhododendron Dell? It is a sad sight now. Damage is cumulative and that's what Redwood Shores will look like in the future.

Land 6. Of 130 varieties of plants in established residential front yards in the Shores only 30 have a high tolerance to salt. Parks & Recreation may be pleased with the project but I doubt that many homeowners want their front yards to look like Shearwater Parkway.

Topic---Water Conservation concerns

Conserv 1. Redwood City is going to implement a conservation program. Why didn't you do that 10 or 20 years ago when other cities did? Why are asking Redwood Shores' homeowners to pay the price of your negligence?

Conserv 2. Why doesn't your Treated effluent Demand Report for Redwood Shores include a section on what the demand could be after conservation audits were offered and new practices implemented? If you included private single home back yards you might discover mandating is not necessary. Is that too much trouble?

Additional written comments for the public record of Addendum to MND

It's truly a pleasure to see council addressing the critical issue of water supply reliability as it relates to treated wastewater and sustainable growth, especially because it is apparent that so many profitable development projects are on-hold or are pending this analysis. It is quite apparent from Attachments #1 and #2, that if we are to go with the wishes of these development interests we will be placing a significant demand on the Bay Area water supply with or without treated wastewater. Just imagine 1900 at Marina Shores, a few thousand downtown, and some more here and there, and we'll have a lot more people depending on our existing water supply.

So, should we go with treated wastewater, the only thing clear about health issues is that more research needs to be done. Nothing is clear or concrete on safety. We heard this first-hand from the State's own Recycled Water Task Force on Feb 26th. As a result, on that day, Ray Wang challenged the task force and other proponents of treated wastewater to put their money where their mouth is. I say we do the same here. Should the city be interested in pursuing the use of treated wastewater in residential areas against residents' wishes like our schools and parks, then the city should also step up to the plate

and assume financial liability for health effects, short-term and long-term as well if it is that safe.

Now, if we go with treated wastewater, what is the real cost to the Redwood City Citizen in this time of statewide financial crisis? How much will we be paying for this system, in taxes and bonds? (for those of you out there, remember bonds are also a form of tax). On the issue of quality of life, how will we benefit in a drought by having more users on the water system? Are we diverting money we could be using for other city services like public safety?

However, should we take a more rational, "sustainable growth" approach, it is obvious that through aggressive conservation programs, we can easily meet our water assurance targets for the next 10 years or more. If accurate, the data clearly shows that we'll not only live comfortably within our means and probably be able to include critical priorities such as Kaiser and Sequoia but also not place our citizens at risk in residential areas. The city currently proposes a **15% target** for conservation. However, it is very likely that we can achieve **30%** with community cooperation and outreach. We can make an even greater impact on both irrigation savings and indoor usage conservation. At the State Task Force, the Deputy Director suggested that Redwood City look into *a Radio Based ET Controllers for irrigation*. He even provided the phone number and the contact person for complete info. on the product at the State level! There is even a workshop provided by California Urban Water Conservation Council on March 20th or 26th.

From the city report, we are already quite successful on toilet rebates. Let's keep up the good work and add other programs to the significant savings. We can all benefit from this much more than the growth promised by developers. I'd like to suggest you direct the City staffs into more aggressive conservation programs with community outreach and partnership instead of this continued obsession with treated wastewater in residential areas. As we've mentioned, for industrial, and commercial, especially closed looped, we have no issues.

Now, for those of you in favor of affordable housing, who may see this as an attempt to thwart those efforts, I ask you to see through this rouse. Let's be honest. **How many people in this room really think \$405K represents affordable for a 1 bedroom 1/bath unit? How about \$600K for a 2 bedroom/ 2 bath unit?** A comparable 2br/2ba unit in Redwood Shores is only \$400K and that's not even considered affordable. You think the average city employee or teacher can afford to raise their family at that price? Is this even really "Smart Growth" being so far from the transit corridor? As the county has shown, for a single mother with 2 kids to survive in this county, you need about \$70K in income. We need smarter affordable housing, not more costly projects like Marina Shores.

Our point is if developers and their projects are truly the reason behind this \$40 million treated wastewater project, then many of us in the Safewater Coalition are strongly opposed to having treated wastewater in residential areas so that we can

have irresponsible growth at our citizen's expense. Even by saving enough water, new projects put us all at water sustainability risk or potential health risks in residential areas.

Once again, are we willing as a city to let developer interests or political ambitions stand in the way of the Redwood City citizen. Let's develop a framework that addresses priorities for future development with the understanding of our constraints and community wishes.

Sincerely,

Christina Lai, Co-Founder of Safewater Coalition

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