

PUBLIC COMMENT: PSNS HEARING ON GROUNDWATER MIXING MAY 24, 2017

Good Morning Supervisors. Dr. Lisa Fromer, President, LHNA

The Precautionary Principle was adopted in San Francisco in 2003.

It states that decisions related to human health and safety and the environment should acknowledge potential harm, based on the best available science. The burden of proof that substances are safe rests with the producer or governmental agency, not the public.

It also says that “One of the goals of the Precautionary Principle is to include citizens as equal partners in decisions affecting their environment.”

So on April 18th, how did the SFPUC claim compliance with the Precautionary Principle when minimally treated groundwater was introduced into our public drinking water? And how were residents included as equal partners in this decision?

Legitimate questions have been raised about groundwater contaminants, such as nitrates and manganese. But this system of regulating contaminants in water from a constricted one-at-a-time vision ignores that combinations of these chemicals interact in unpredictable or harmful ways, even at concentrations below “legal limits” or MCLs

In the case of nitrates, the 10 ppm standard does not reflect new knowledge about how nitrates are converted in our digestive tracts to carcinogenic N-nitrosamines.

It’s the cumulative effect of exposures to both regulated and unregulated chemicals in our water, food and air that causes harm.

There are too many unanswered questions to support this decision to add groundwater to our Hetch Hetchy drinking water. The SFPUC should stop the Groundwater Supply Project until further hearings with adequate public participation can determine compliance with our Precautionary Principle.

