




CITY OF SANTA FE

Memorandum

Date: August 15, 2025

To: Governing Body; Public Works and Utilities Committee; Finance Committee

From: Jesse Roach, Interim Public Utilities Director 
JR

RE: Amending Fluoridation Ordinance 25-1.8

EXECUTIVE SUMMARY:

This bill would require monitoring of the naturally occurring level of fluoride in the City’s municipal water supply and end the requirement for supplemental fluoridation of that water supply.

BACKGROUND AND JUSTIFICATION:

Current Code & Federal Guidance

Santa Fe City Code (25-1.8) directs fluoridation of the municipal water supply to maintain a concentration between 0.8 and 1.2 parts per million (ppm), while the Center for Disease Control (CDC) has recommended a concentration of 0.7 ppm in drinking water for the purpose of dental health since 2015. Emerging, but unsettled science suggests possible negative cognitive impacts in children at levels associated with current federal guidelines. In 2024, a California District Court judge in the case *Food & Water Watch, Inc. vs. United States Environmental Protection Agency* found that fluoridation of water at the level currently recommended by the United States poses an “unreasonable risk” of reduced IQ in children. The judge also noted that “this finding does not conclude with certainty that fluoridated water is injurious to public health.” Rather, “there is an unreasonable *risk* of such injury”, sufficient to require the Environmental Protection Agency “to engage with a regulatory response.” A regulatory response would be a rulemaking, during which the EPA would consider options ranging from requiring a notice be provided to the public, to prohibiting manufacture or distribution. This remains an area of active public policy and scientific debate, and additional investigation will be necessary to improve understanding of potential cognitive impacts associated with fluoridated water.

Naturally Occurring Fluoride in Santa Fe Water

The City of Santa Fe (“City”) typically meets about 80% of water demand with river water, and the remainder comes from wells. Fluoride occurs naturally in the river water the City utilizes and is not removed by the City’s treatment plants. Within the past decade background fluoride concentrations in treated water from the Canyon Road Water Treatment Plant (“CRWTP”) and the Buckman Direct Diversion (“BDD”) Water Treatment Plant (BDDWTP) have typically ranged from 0.2 to 0.7 ppm*.



CITY OF SANTA FE

Memorandum

Infrastructure Upgrades Necessary to Accurately Add Fluoride

Currently, fluoride can be added to water treated at CRWTP. However, equipment limitations make it difficult to accurately add fluoride at low flows. As a result, the City is currently only fluoridating water from CRWTP when flows from that plant are above 4 million gallons per day. Fluoride can also be added to water treated at BDDWTP, but because BDDWTP is jointly operated with the County, and governed by its own board which has not adopted a fluoridation policy, this equipment is not used. To add fluoride from BDDWTP water after treatment, but before delivery to City customers, would require system upgrades. Equipment at wells would also need to be replaced to fluoridate well water. Staff estimates that between \$400k and \$600k of capital investment would be necessary to accurately add fluoride to consistent levels for all water delivered to City customers.

Safety Considerations

The Sodium fluorosilicate powder that is used to fluoridate at CRWTP is a breathing and skin contact hazard.

Operations Costs to Add Fluoride

City staff estimates that fluoridating City potable water from an average background concentration of between 0.3 ppm and 0.6 ppm* to the current code target of 1 ppm would cost approximately \$30,000-\$40,000 per year in sodium fluorosilicate material.

Conclusion

There are dental benefits associated with having fluoride in drinking water. The findings in the *Food & Water Watch, Inc.*, California district court case also concluded that there are risks associated with fluoridation. In addition, the current level required by City Code exceeds CDC guidance of 0.7 ppm. Natural fluoride in City water provides on average 0.5 ppm and at times up to 0.7 ppm. Adding more fluoride to increase that level to code requirements involves safety risks, would be expensive, and is perhaps unwarranted. The advisable course of action at this time is to remove the code requirement, monitor the natural levels, and monitor legal and scientific developments at the national level.

* From 2018 to 2021, 507 fluoride samples were taken at BDD and the average value was 0.58 ppm and half of the measurements were between 0.5 and 0.7 ppm inclusive. In 2023 and 2024, 190 fluoride samples were taken at CRWTP and the average value was 0.29 ppm and half of the measurements were between 0.23 and 0.33 ppm inclusive. In the distribution system in 2021 and 2022, 320 fluoride samples were taken and the average value was 0.49 ppm and half of the measurements were between 0.3 and 0.6 ppm.

ATTACHMENTS:

Bill and FIR