The Community Water Center, based in Tulare County, California, seeks to ensure that all communities have access to safe, clean, and affordable water. Our mission is to create community-driven water solutions through organizing, education and advocacy in California’s San Joaquin Valley.

The San Joaquin Valley is the center of California’s growing drinking water crisis. Five of its eight counties – Fresno, Madera, Merced, Kern, Kings, San Joaquin, Stanislaus, and Tulare – have some of the highest rates of water contamination per person in the state. Contaminated drinking water causes many adverse human health effects, including gastrointestinal illnesses, nervous or reproductive system impacts, and chronic diseases such as cancer.

This is the first of a series of reports that examine the prevalence of common drinking water contaminants in the San Joaquin Valley and the rates of related health indicators as outlined in public health literature. According to the Centers for Disease Control and Prevention, health indicators can “…provide information about a population’s health status with respect to [environmental] factors that can influence health.” Our intention is to draw connections between contaminants in drinking water and the high rates of many diseases prevalent in the San Joaquin Valley.

It is not our intention to prove that certain diseases are a direct result of water contamination. Cause and effect can only be established through long-term longitudinal health studies with tests of the participants’ drinking water. The health effects discussed here cannot be conclusively attributed to any contamination in the Valley’s drinking water.

Despite these limitations, it is indisputable that San Joaquin Valley residents struggle with a wide range of diseases, as well as contaminated drinking water, and these facts should not be ignored or dismissed. Our goal with this series of health papers is to provide information that can begin to address these important issues.

The Community Water Center would like to thank The California Endowment, The David and Lucile Packard Foundation, The California Wellness Foundation, and The Women’s Foundation of California for their generous support of this project, as well as Ann Moss Joyner of the Cedar Grove Institute for Sustainable Communities, Carolina Balazs, and Amy Vanderwarker.
Nitrate is a natural and human-made contaminant.

Nitrate is an inorganic compound produced when nitrogen is introduced into the environment. Although nitrate occurs naturally at low levels, human activities, including the use or improper disposal of fertilizers, animal manure, or human waste, can elevate levels of nitrates in sources of drinking water. At high levels, nitrates have been linked to a range of diseases, discussed below.

Nitrate contamination of drinking water is widespread and increasing in California.

Nitrate is the largest source of well closures in the state. An additional 10 to 15 percent of wells in California already exceed nitrate standards for drinking water. According to the Lawrence Livermore National Laboratory Nitrate Working Group:

The human activities that contribute nitrate to groundwater – animal operations, crop fertilization, wastewater treatment discharge, septic systems – are ongoing and essential to the industry and commerce of the State of California. Best management practices can mitigate source loading but not eliminate it. Furthermore, nitrate is expensive to remove from drinking water supplies, especially in public and private systems that rely on untreated groundwater and do not have the necessary water treatment infrastructure. These factors combine to make nitrate the greatest contaminant threat to California’s drinking water supply.

Unfortunately, the number of wells contaminated with nitrates in California is only increasing. Furthermore, many wells have nitrate levels just below the legal limit leaving them highly vulnerable to any increases. In 2007, over a third of all groundwater samples taken by the State Water Resource Quality Control Board contained between 10 and 45 mg/L of nitrates (45 mg/L is the legal limit). Another factor that may exacerbate levels of contamination are increasing drought conditions. Drought conditions in California are expected to worsen in the coming years, and researchers have found that low groundwater levels worsen well contamination.

According to UC Berkeley research:

Our findings show that in smaller water systems, communities with larger fractions of Latinos and renters are potentially exposed to drinking water with higher nitrate levels compared to communities with higher proportions of white residents and homeowners.

We found that in systems with fewer than 200 connections, those with higher fractions of people of color or fewer homeowners have higher nitrate levels.

The problem of nitrate-contaminated drinking water wells is most acute in the San Joaquin Valley.

The San Joaquin Valley is vulnerable to nitrate contamination because groundwater serves as the source of drinking water for almost 90 percent of its residents. Groundwater contamination, in effect, becomes drinking water contamination.

Many studies document the widespread, high levels of nitrate contamination in San Joaquin Valley groundwater:

- In 2009, 42 percent of wells tested near dairies exceeded health standards for nitrates.
- In 2007, 74 percent of all nitrate health standard violations in the state were found in the San Joaquin Valley, impacting over 275,000 people.
- In 2007, 61 percent of all people served drinking water from a community water system in the San Joaquin Valley received water with nitrate levels at least half of the state and federal health limit.
- In 2003, 13 percent of drinking water from wells in the San Joaquin Valley groundwater basin exceeded nitrate health standards.
- According to a United States Geological Survey (USGS) study of water quality in the San Joaquin Valley groundwater basin from 1992 through 1995:
  - 24 percent of wells tested exceeded state health standards in the eastern San Joaquin Valley.
  - 40 percent of wells near almond orchards exceeded drinking water standards in the San Joaquin Valley Basin.
  - Nitrates were detected in 97 percent of wells sampled throughout the Valley.

According to the United States Geological Survey:

Ground water is the source of drinking water for most of the population of the eastern San Joaquin Valley. Each year, millions of pounds of nitrate (in fertilizer and manure) and pesticides are applied to cropland. Some of these chemicals infiltrate to the water table, degrade the water quality, and potentially cause a public health risk.

In the San Joaquin Valley, the largest sources of nitrate pollution are chemical fertilizer applications and manure produced at immense confined animal feeding operations throughout the region.

The San Joaquin Valley is California’s agricultural heartland. California generates 13 percent of U.S. farming receipts, and the San Joaquin Valley accounts for over half of this agricultural production. Fresno, Tulare, Kern, Merced, San Joaquin and Stanislaus are all among California’s top seven agricultural counties.

The USGS has found that nitrate pollution of both surface and ground water in the valley is due primarily to the region’s intensive irrigated agriculture and its use of chemical fertilizer. The San Joaquin Valley contains over 6.6 million acres of irrigated cropland. One acre of irrigated cropland typically produces more than 80 pounds of nitrogen per acre per year that may leach into groundwater, usually as nitrate.

Animal wastes produced by the region’s confined animal feeding operations are a major source of nitrate pollution. A typical dairy cow produces 32.77 tons of solid manure per year, and 1 to 2.5 percent of this amount is nitrogen. In 2008, the San Joaquin Valley contained almost 1.6 million dairy cows and calves, and 161,000 beef cattle. According to the Regional Board, “waste production at most sites is equivalent to that of a small city.” However, unlike a small city, these large animal facilities do not have extensive treatment systems.

According to the *Southwest Journal of Hydrology*:

Agriculture’s use of inorganic fertilizer and animal manure is the most dominant groundwater contaminant besides salt, both in the United States and globally. The major regions with high groundwater nitrate pollution are therefore not surprisingly the major agricultural regions: Imperial, Central, Salinas, and other coastal valleys in California.

Health Impacts of Nitrate Contamination

Exposure to nitrates can cause immediate, or acute, health problems. Exposure over long periods of time can lead to many other dangerous health conditions.

In the short-term, nitrates can cause:
- Methemoglobinemia, or “Blue Baby Syndrome”\(^{30}\)
- Indigestion and inflammation of the stomach and gastrointestinal tract (gastroenteritis), with abdominal pain, diarrhea, and blood in the urine and feces\(^{31}\)

In the long-term, scientific and medical studies have linked nitrates to:\(^{32}\)
- Multiple digestive tract impairments, including dyspepsia\(^{33}\)
- Depression, headache and weakness\(^{34}\)
- Miscarriage,\(^{35}\) stillbirths or premature birth\(^{36}\)
- Sudden Infant Death Syndrome (SIDS)\(^{37}\)
- Mutagenicity (DNA damage) and tetragenicity\(^{38}\)
- Impaired growth of fetuses in utero, leading to neural tube disabilities and other birth-related disabilities\(^{39}\)
- Cancers of the digestive system,\(^{40}\) stomach,\(^{41}\) esophagus,\(^{42}\) lungs,\(^{43}\) colon,\(^{44}\) bladder and ovaries,\(^{45}\) testicles,\(^{46}\) uro-genital tract,\(^{47}\) and non-Hodgkins lymphoma\(^{48}\)
- Nervous system disabilities\(^{49}\)
- Diuresis (increased urination), increased starchy deposits and hemorrhaging of the spleen\(^{50}\)
- Active ulcerative colitis and Crohn's disease\(^{51}\)
- Pancreatitis,\(^{52}\) which is highly associated with pancreatic cancer\(^{53}\)
- Thyroid disruption, including hypertrophy and increased risk of thyroid cancer\(^{54}\)

Children are especially vulnerable to the following health impacts of nitrates:
- Methemoglobinemia, or “Blue Baby Syndrome”\(^{55}\)
- Inflammatory bowel disease\(^{56}\)
- Acute respiratory tract infections\(^{57}\)

These health impacts can be exacerbated if a person is consuming nitrate-contaminated water and that person has a preexisting gastrointestinal problem, such as inflammation. Health impacts can also be exacerbated if nitrate contamination is accompanied by bacterial contamination. Studies have shown that drinking water contaminated with both bacteria and nitrates can make methemoglobinemia more likely.\(^{58}\) High nitrate levels can also be especially harmful to vulnerable populations, such as pregnant women and children.\(^{59}\)

Nitrates can have indirect health impacts as well. In particular, diabetes may be indirectly linked,\(^{60}\) because impaired pancreas functioning can lead to diabetes mellitus, and nitrates are associated with chronic pancreatitis. In fact, nitrate concentrations in blood have been recommended as a marker for diabetes.\(^{41}\)
Figure 1 - Total number of wells in California’s Central Valley with nitrate levels detected over the Maximum Contaminant Level (MCL).

Source: Presented at a public workshop at the Central Valley Regional Water Quality Control Board in 2009 as part of a larger presentation entitled “Nitrate Effects on Public Water System Wells” by Leah Godsey Walker, P.E., Chief Drinking Water Technical Programs Branch, California Department of Public Health.
Figure 2: State Water Resource Control Board mapping of domestic wells with high levels of nitrate contamination (2006).
Case Study: Nitrates Impact Communities in Tulare County

Tulare County is at the center of the San Joaquin Valley’s drinking water crisis. The number of drinking water systems with contaminant violations is particularly high. To explore the relationship between high levels of contamination and health outcomes, CWC has assembled detailed information on the rates of diseases in Tulare County associated with nitrates, as outlined in scientific and medical literature.

**Tulare County is home to intensive agriculture and dairy production.**

In 2007, close to 500,000 acres were fertilized in Tulare County. While application rates across crops vary by many factors, such as grower, season, and soil type, average nitrogen application rates for the County’s largest crops indicate that almost 8.5 million pounds of nitrogen are applied on an annual basis in Tulare County.

In addition, Tulare County produces more animal waste than any other county in California. In 2008, there were 483,500 milk cows and 28,000 beef cattle in Tulare County alone. In 1997, the most recent year there is available data, Tulare County produced the most animal waste of any county in the state, a total of 7,800,000 tons, resulting in 83,000,000 pounds of nitrogen.

**Many studies document the high rates of nitrates in Tulare County’s groundwater.**

Over 90 percent of all Tulare County residents rely on groundwater as their source of drinking water, making the area particularly vulnerable to contamination. The intensive agricultural and dairy production has resulted in high rates of nitrate contamination in groundwater:

- Over 20 percent of small public water systems serve water with nitrate levels that exceed federal health limits, according to 2006 data from the Tulare County Department of Environmental Health.
- Nitrate levels in Tulare County wells ranged from 10 to 54 mg/L (45 mg/L is the state health standard), according to a 2003 Department of Water Resources study.
- Over 40 percent of private wells tested in a recent study exceeded federal health standards for nitrates, according to the Groundwater and Ambient Monitoring Assessment 2006 data.
Many of the health indicators associated with nitrate contamination have elevated rates in Tulare County.\textsuperscript{71}

The following tables present information on health outcomes that occur at elevated levels within Tulare County and are associated with high nitrate levels. Information for health outcomes that occur at average statewide rates are not included. All statistics are expressed as “death rates,” which refer to the rate of death for each associated disease per 100,000 people. The death rate for each disease varies depending on the health outcome, but in each outcome listed, Tulare County’s death rate occurred at levels significantly higher than the state rate.

Reproductive and Infant Health Concerns

Residents in Tulare County face a variety of reproductive and infant health issues at levels that are significantly higher than elsewhere in the state. Given the strong connection between nitrate contamination, reproductive health and infant mortality, this is cause for alarm.

Tulare County’s infant mortality rate is higher than the state average – 6.4 versus 5.3 (per 100,000 infants births).\textsuperscript{72} These rates have remained consistently high since 1990.\textsuperscript{73} Another cause for concern is that studies have shown that drinking water contaminated with both bacteria and nitrates can make methemoglobinemia (blue baby syndrome) more likely.\textsuperscript{74} In private well testing in Tulare County, 15 percent of wells tested exceeded MCLs in both categories.\textsuperscript{75}

<table>
<thead>
<tr>
<th>Health outcome associated with high nitrate levels</th>
<th>Death rate in Tulare County</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sudden Infant Death Syndrome</td>
<td>146 to 252 percent of state rate (2003)</td>
</tr>
<tr>
<td>Methemoglobinemia, or “Blue Baby Syndrome”</td>
<td>140 percent of state rate, ranking Tulare County 42\textsuperscript{nd} of all California counties (2006)</td>
</tr>
<tr>
<td>Congenital malformations, deformations and chromosomal abnormalities, including neural tube disabilities</td>
<td>109 percent of state rate (2003); leading cause of infant death in 2005</td>
</tr>
<tr>
<td>Certain Conditions Originating in the Prenatal Period</td>
<td>250 percent of state rate (2003)</td>
</tr>
<tr>
<td>Spontaneous abortion, miscarriage</td>
<td>211 percent of state rate (2001-2003)</td>
</tr>
</tbody>
</table>

Source: California Department of Public Health, Center for Health Statistics, Office of Health and Information Research.
Gastrointestinal Illnesses

Many gastrointestinal illnesses are related to nitrates. One of the acute impacts of consuming nitrate-contaminated water is a variety of gastrointestinal illnesses. Almost 17 percent of farm workers in Tulare experienced at least monthly bouts of diarrhea, vomiting, and/or stomach pains. While these may or may not be linked to nitrates, gastrointestinal inflammation exacerbates the more serious health impacts of nitrate contamination, such as pancreatitis and cancers of the gastrointestinal tract.

<table>
<thead>
<tr>
<th>Health outcome associated with high nitrate levels</th>
<th>Death rate in Tulare County</th>
</tr>
</thead>
<tbody>
<tr>
<td>Digestive System Cancers</td>
<td>125 percent of state rate</td>
</tr>
<tr>
<td>Pancreatic cancer</td>
<td>121 percent of state rate</td>
</tr>
<tr>
<td>Esophagus Cancer</td>
<td>Between 125 and 134 percent of state rate (2001 - 2005); as high as 153 percent for females</td>
</tr>
<tr>
<td>Stomach Cancer</td>
<td>#8 in state for deaths caused by stomach cancer (1988-2005)</td>
</tr>
<tr>
<td>Bladder Cancer</td>
<td>111 percent of state rate (2003)</td>
</tr>
<tr>
<td>Ovarian Cancer</td>
<td>116 percent of state rate (2001-2005)</td>
</tr>
<tr>
<td>Colon Cancer</td>
<td>113 percent of state rate (2005)</td>
</tr>
<tr>
<td>Lung Cancer</td>
<td>108 percent of state rate (2001-2005); as high as 115 percent in 2005</td>
</tr>
</tbody>
</table>

Source: California Department of Public Health, Center for Health Statistics, Office of Health and Information Research.
Additional Health Outcomes Associated with Nitrate Contamination

Several other health outcomes associated with nitrates occur at notably high rates in Tulare County. For example, consumption of water high in nitrates has been shown to increase hypertrophy, a condition marked by enlargement of the thyroid, which is responsible for many of the body’s endocrine and hormonal functions. Tulare County’s rate of death for these diseases is exceptionally high. Another endocrine-related disease is diabetes mellitus, which is associated with the endocrine portion of the pancreas. Nitrates are associated with chronic pancreatitis, and total nitrate concentrations in blood serum have been suggested as a prognostic marker for diabetes.

<table>
<thead>
<tr>
<th>Health outcome associated with high nitrate levels</th>
<th>Death rate in Tulare County</th>
</tr>
</thead>
<tbody>
<tr>
<td>Endocrine, Nutritional and Metabolic Diseases (including thyroid disorders)</td>
<td>172 percent of the state rate (2003)</td>
</tr>
<tr>
<td>Respiratory problems; shortness of breath; acute respiratory infections</td>
<td>119 percent of state rate (2007)</td>
</tr>
<tr>
<td>Diabetes</td>
<td>148 - 158 percent of state rate (2003 - 2006)</td>
</tr>
</tbody>
</table>

Source: California Department of Public Health, Center for Health Statistics, Office of Health and Information Research.

What is the legal health limit for nitrate?

California Department of Public Health (CDPH) has set a legal limit of 45 milligrams per liter (mg/L) for nitrates in public drinking water supplies.

In California, the Maximum Contaminant Level (MCL) for nitrates is 45 mg/L. Water that has a concentration higher than this limit is considered unsafe and a violation of the Safe Drinking Water Act. Many experts debate whether this limit is too low. For example, the European Economic Community has set a more conservative health standard of 5.6 mg/L. The U.S. Environmental Protection Agency (EPA) regulates nitrates primarily for its link to methemoglobinemia but does not even list the many other potential health risks of nitrate contamination.

In particular, the EPA does not consider nitrate’s link to cancer, despite studies by both the National Academy of Sciences and the International Agency for Research on Cancer that indicate the connections. According to a Working Group of the International Society for Environmental Epidemiology, the EPA has “not thoroughly considered chronic health outcomes….The few epidemiologic studies that have evaluated intake of nitrosation precursors and/or nitrosation inhibitors have observed elevated risks for colon cancer and neural tube defects associated with drinking water nitrate concentrations below the regulatory limit.”

Another concern with the EPA limit is that nearly all other chemical standards create a “buffer” between exposure and particularly vulnerable populations, so that even if they are exposed to the legal limits of a contaminant, they will be protected. Nitrate health standards do not have such a “margin of...
safety,” particularly for infants. Studies of infants in Europe have found that three to four percent of methemoglobinemia cases in infants occurred at doses lower than the U.S. federal MCL of 10 mg/L.

Cumulative Impacts: Examining the Range of Impacts Caused by Contaminated Drinking Water and Other Environmental Stressors

*Exposure to nitrate contamination is compounded by poverty.*

Nitrate contamination has many impacts on the health and quality of life of San Joaquin Valley residents that cannot be captured in health statistics. Research has consistently shown that low-income communities and communities of color have higher rates of a range of environmentally-related diseases, ranging from asthma to lead poisoning, and socio-economic factors such as income level can contribute to a person’s vulnerability to disease. The San Joaquin Valley is home to both low incomes and high rates of disease. Average per capita income in the San Joaquin Valley is around $20,000, significantly less than the California average. Almost 19 percent of residents live below the poverty line, versus California’s average of 13 percent, and one fifth of the San Joaquin Valley’s population lacks health insurance. Death rates and cancer rates in the San Joaquin Valley regularly exceed state averages. Tulare County has the 14th highest death rate of all California counties, higher than the state average. Residents also face an increased risk of cancer. In 2007, the risk for all types of cancer was 106 percent of the state rate.

Forcing residents to choose between covering basic household costs and buying additional water to supplement their contaminated tap water is a real threat in the San Joaquin Valley. Some people are unable to afford buying bottled water, leaving them no choice but to rely on contaminated tap water and thus face increased exposure to dangerous contaminants.

*Nitrate contamination imposes an economic burden on Valley residents.*

Because of the widespread nature of contamination in the San Joaquin Valley, many residents spend extra money to buy safe water. For example, in the small town of Seville, in Tulare County, the elementary school spends between $5200 and $7200 a year on bottled water to avoid serving nitrate-contaminated water to local children. The average annual income in Seville is approximately $14,000 per year. CWC calculates that many residents throughout the Valley spend up to 10 percent of their income on water, forced to buy safe bottled or vended water on top of monthly water bills. The EPA has established criteria for determining what is an “affordable” household cost for water; the agency considers spending over 2 percent of annual income to be unaffordable.

According to the California Department of Food and Agriculture:

Additional costs of nitrate in groundwater include land use restrictions, denial of loans for lack of a suitable water supply, and a reduced tax base. So the problem of increased nitrate levels in California’s groundwater is both significant and persistent.

California Department of Food and Agriculture. (2010) “About Fertilizer”.

Photos by Bear Guerra
There are additional economic consequences to nitrate contamination, as well. Towns throughout the San Joaquin Valley have been forced to close wells due to nitrate contamination. Small water systems may also need to impose high water rates on their low-income customers to cover expensive treatment systems.

**Nitrate is not the only contaminant in the San Joaquin Valley.**

Unfortunately, the health problems associated with nitrate contamination in drinking water may be exacerbated and/or compounded by many other environmental and health stressors. While we have outlined the health indicators specifically related to nitrate contamination in drinking water according to classic toxicology and epidemiological literature, these approaches do not assess the danger of nitrates when combined with multiple sources and pathways of exposure from a wide variety of stressors.

In recent decades, more attention has been placed on the idea of “cumulative risks and impacts.” According to the National Environmental Justice Advisory Committee, this concept is “a matrix of physical, chemical, biological, social and cultural factors which result in certain communities and sub-populations being more susceptible to environmental toxins, being more exposed to toxins, or having compromised ability to cope with and/or recover from such exposure.”

As the National Academy of Sciences notes, multiple stressors, ranging from chemicals released from noxious land uses to socioeconomic factors, can exacerbate the impacts of one particular source. They recommend “that exposure assessment methods [for environmental hazards] be expanded to consider exposures to multiple chemicals with multiple routes of exposure...These models need to be able to assess the cumulative effects of chemicals that may have either synergistic or antagonistic actions.”

If cumulative risks make certain communities more vulnerable to stressors, such as drinking water contamination, the residents in the San Joaquin Valley are extremely vulnerable. In addition to nitrate contamination, residents face a host of other drinking water pollutants, including pesticides, arsenic, disinfectant by-products, and gasoline additives.

Residents of the San Joaquin Valley are also assaulted by some of the most polluted air in the U.S. According to the American Lung Association, five of the nation’s top 25 cities most polluted by particle matter are in the San Joaquin Valley. In addition, five San Joaquin Valley counties make the top 25 list of the most polluted counties for both ozone and particulate matter.

Cumulatively, residents in the San Joaquin Valley face many challenges to overall health and quality of life. While many of these issues are complex and difficult to address, reducing the high rates of nitrate contamination in drinking water is an important part of strengthening the health of Valley residents.
Conclusion: Ensuring Safe, Clean, Affordable Water for the San Joaquin Valley

By outlining the many health indicators associated with nitrate contamination that have been researched and documented in scientific and medical publications, we hope to raise awareness for the potential health threats faced by residents in the San Joaquin Valley. The research presented here does not create a definitive “link” between nitrate contamination and rates of disease in any one place, nor does it fully address all the potential ways San Joaquin Valley residents are impacted by drinking water and other environmental health contaminants.

The research does show two things, however: the San Joaquin Valley has high rates of nitrate contamination from agriculture and large animal facilities, and San Joaquin Valley residents face many health problems at rates much higher than elsewhere in the state. We believe that these two facts alone should be enough to compel us – as water providers, as government regulators, as residents in the San Joaquin Valley, and as a society – to ensure that our drinking water sources are protected to the utmost of our ability and to prioritize reducing the number of people drinking contaminated water. Safe, clean water is a human right, not a privilege.

For more information, please visit our website or contact us!

Community Water Center
311 W. Murray Street
Visalia, CA 93291
(559) 733-0219
info@communitywatercenter.org
End Notes


18. Ibid.


22. Ibid.


29. Ibid.


34. Ibid.


Fan and Steinberg (1996).


Scorecard (2005).

Balazs (2009).

Tulare County Department of Environmental Health. (July 17, 2007). County Of Tulare Agenda Item: Modification of the Membership of the Tulare County Water Commission and Authorization of Submission Of A Proposition 84 Grant Application. Tulare County.


We used the most recent health statistics available to compile these figures. All death rates were taken from the California Department of Public Health, Center for Health Statistics, Office of Health and Information Research. For each health indicator, the data cited here are the most recent we were able to find during the time the research was originally undertaken (2008-2009).


Fan and Steinberg (1996).


California Department of Health Services (2005).


80 Kostraba et al. 1992. See also: Parslow et al. (1997).
81 Nunes et al. (2008).
89 Safe Drinking Water Committee (1977).
90 Simon et al. (1964).
93 Ibid.
96 California Department of Public Health (2008).
97 California Department of Public Health, Center for Health Statistics, Office of Health and Information Research.
98 Quintana, R. (May 4, 2010). Personal communication.
102 For example, the small community of Alpaugh, in Tulare County, has been forced to raise rates to cover the cost of arsenic treatment.
104 Ibid.