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*Chief Executive Officer and General Manager*

March 7, 2008

Mr. Wayne Nastri, Regional Administrator  
United States Environmental Protection Agency  
Region IX  
75 Hawthorne Street  
San Francisco, California 94105

Dear Mr. Nastri:

Subject: Remedial Action of Groundwater Contamination in the San Fernando Basin (SFB),  
Chromium Workshop Comments

The City of Los Angeles Department of Water and Power (LADWP) is very concerned about the delays in fully characterizing the SFB's contamination, identifying pollutant sources, and in implementing appropriate and comprehensive treatment processes to remediate the SFB, from which the City of Los Angeles draws its local groundwater supply.

Due to contamination, principally from volatile organic compounds (VOC), LADWP's capacity to pump its groundwater has substantially diminished. The City of Los Angeles has lost the ability to pump 47 percent of its wells in the SFB, which supply the needs of over 500,000 people.

LADWP has been interfacing with the Environmental Protection Agency (EPA) for well over 20 years to address groundwater contamination, pollutant sources, and remediation strategies. Despite efforts by the EPA, the contamination is expanding to other areas in the SFB along with having increased concentrations of primarily Trichloroethylene (TCE), Tetrachlorethelyne (PCE), and to a lesser extent, chromium. Emerging contaminants are also posing a threat as well. Additionally, while major sources of pollution have been identified, identification of all potential pollutant sources still remains. Lastly, the only remediation strategy that has been pursued to protect LADWP's groundwater resources, namely the North Hollywood Operable Unit, whose purpose was to contain and treat the contaminant plume, has failed. This has resulted in LADWP shutting down 54 of its 115 wells.

Shutting down the contaminated wells has caused the City of Los Angeles to rely on increased water from the fragile Delta system. Additionally, losses of supply from the Eastern Sierra, until recently the City's largest water source, have diminished due to environmental enhancement projects in the Owens Valley. These issues heighten the urgency to regain the full use of our local water supplies.

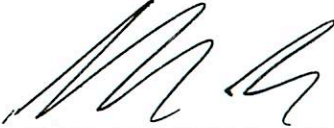
**Water and Power Conservation ... a way of life**

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LADWP is anxious to have the EPA develop a long-term, comprehensive solution for the existing and emerging contamination issues for the entire SFB.

Sincerely,



H. David Nahai  
Chief Executive Officer  
and General Manager

JGY:jmm

c:   Honorable Dianne Feinstein  
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