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11 Attorneys for Los Angeles County Flood Control District

14 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
15 FOR THE COUNTY OF LOS ANGELES

17 UPPER SAN GABRIEL VALLEY  
18 MUNICIPAL WATER DISTRICT

19 Plaintiff,

20 vs.

21 CITY OF ALHAMBRA, ET AL.

22 Defendant.

Case No: C924128

Assigned for All Purposes to:  
Honorable Maureen Duffy-Lewis  
Dept. 38

**JOINT STATEMENT OF LOS ANGELES  
COUNTY FLOOD CONTROL DISTRICT  
AND MAIN SAN GABRIEL BASIN  
WATERMASTER RE GOLDEN MUSSEL  
ISSUES**

Hearing Date Set by Court

**Date: April 8, 2026  
Time: 9:30 a.m.  
Place: Dept. 38**

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 The Los Angeles County Flood Control District ("District") and the Main San  
3 Gabriel Basin Watermaster ("Watermaster") have entered into a Letter of Intent  
4 ("LOI") with respect to the Golden Mussel Issues. A copy of the LOI is attached  
5 hereto as Exhibit A. As set forth therein, the District and Watermaster intend to  
6 collaborate in remediating problems presented by the potential Golden Mussel  
7 infestation and restoring full scale imported water operations in the Main San Gabriel  
8 Basin under the Judgment in accordance with the LOI and the existing  
9 District/Watermaster spreading agreement.

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11 DATED: March 9, 2026

NOSSAMAN LLP  
Frederic A. Fudacz  
Alfred E. Smith

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By: /s/ Frederic A. Fudacz  
Frederic A. Fudacz  
Attorneys for Main San Gabriel Basin Watermaster

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18 DATED: March 9, 2026

BEST BEST & KRIEGER LLP  
Eric L. Garner  
Jeffrey V. Dunn

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By: /s/ Eric L. Garner  
Eric L. Garner  
Attorneys for Los Angeles County Flood Control  
District

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# **EXHIBIT A**



MARK PESTRELLA, Director

# COUNTY OF LOS ANGELES

## DEPARTMENT OF PUBLIC WORKS

*"To Enrich Lives Through Effective and Caring Service"*

900 SOUTH FREMONT AVENUE  
ALHAMBRA, CALIFORNIA 91803-1331  
Telephone: (626) 458-5100  
<http://dpw.lacounty.gov>

ADDRESS ALL CORRESPONDENCE TO:  
P.O. BOX 1460  
ALHAMBRA, CALIFORNIA 91802-1460

March 6, 2026

IN REPLY PLEASE  
REFER TO FILE: **SWE-0**

Ms. Lynda Noriega, Board Chair  
Main San Gabriel Basin Watermaster  
725 North Azusa Avenue  
Azusa, CA 91702

Dear Ms. Noriega:

### **LETTER OF INTENT – COORDINATION ON INVASIVE MUSSEL DETECTION AND OPERATIONAL RESPONSE**

This Letter of Intent documents our discussions and our agreement to resume utilizing Los Angeles County Flood Control District (District) infrastructure to replenish the Main San Gabriel Basin with water from the State Water Project (SWP).

1. Goal of Agreement: Identify and implement both short-term and, ultimately, long-term solutions intended to prevent and remediate problems presented by potential Golden Mussel infestation including, without limitation, damage to District infrastructure and operations so that such solutions will restore imported SWP water deliveries to the Basin.
2. As a condition of this Letter of Intent, a District Representative and District counsel are willing to participate in a future Status Conference and request that the Watermaster agree to stipulate that the Court continues the February 5, 2026, conference in order to accommodate the calendar of the District Chief Engineer so that he may attend and brief the Court.
3. Short Term Resolution: Effective March 1, 2026, when the District has sufficient capacity in the Canyon Basins and it would not impair the District's operations as determined by the District, Watermaster may instruct the San Gabriel Valley Municipal Water District to resume deliveries of SWP water through its Devil Canyon Pipeline to the Canyon Basins through March 1, 2027.
  - a. Watermaster will implement Phase 1 (Section 5) of the Draft Invasive Mussel Prevention, Monitoring, Control, and Mitigation Plan for the Delivery of Imported Water in the Main San Gabriel Basin (Mitigation Plan).
  - b. District and Watermaster agrees to cooperate in the implementation of said deliveries and the Phase 1 Mitigation Plan consistent with Los Angeles County Flood Control District Code Section 19.05, and Watermaster agrees to work

Ms. Lynda Noriega  
March 6, 2026  
Page 2

with District to get the Phase 1 Mitigation Plan and the long-term agreement approved pursuant to Fish and Game Code Section 2301.

4. District agrees to collaborate on the planning and development of operational parameters to resume full-scale imported water operations in the Basin in accordance with the District/Watermaster Spreading agreement.
5. Watermaster will work with District so that District will not incur increased costs due to the financial requirements associated with any increased operation and maintenance activities or liability related to any development and infestation of Golden Mussels within the District's facilities.
  - a. The Parties will collaborate to establish "baseline documentation" of operational impacts to develop ongoing maintenance needs, schedules, and annual costs.
6. Parties will discuss recommendations from the County District to update the 2004 Spreading Agreement.
7. The term of this agreement is 1 year subject to the ability of either party to terminate it.

If you concur, please sign below and return.

Very truly yours,



MARK PESTRELLA, PE  
Director of Public Works

JFG:cr

WATER RESOURCES CSA/SWED/LETTER OF INTENT MSGVB WATERMASTER

cc: Kelly Gardner, Executive Officer

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**MAIN SAN GABRIEL BASIN WATERMASTER**

  
Lynda Noriega, Board Chair

03/06/2026

Date