



PO Box 675 • 61750 Chollita Road • Joshua Tree, CA 92252
Ph: (760) 366-8438 • Fax: (760) 366-9528
Website: www.jbwd.com • Email: customerservice@jbwd.com

September 3, 2026

*Via Email (Elena.Barragan@lus.sbcounty.gov)
and U.S. Mail*

Elena Barragan, Principal Planner
County of San Bernardino
Land Use Services Department, Planning Division
385 N. Arrowhead Avenue, 1st Floor
San Bernardino, CA 92415-0187

Re: Comments of the Joshua Basin Water District on the Recirculated Initial Study/Mitigated Negative Declaration — TTM No. 20443 “Lovemore Ranch” (SCH No. 2024101105; Project No. PROJ-2021-00169; APN 0602-361-04)

Dear Ms. Barragan:

The Joshua Basin Water District (“District” or “JBWD”) submits these comments, as a responsible agency, on the County of San Bernardino’s Recirculated Initial Study/Mitigated Negative Declaration (“R-MND”) for the proposed Lovemore Ranch project (“Project”).

The District supplies domestic water within its service area, which includes the proposed Project site, drawn entirely from the groundwater basins underlying the community. The District also holds an activated sewer function that LAFCO in 2007 limited to operation of wastewater package treatment plants and planning and engineering related to regional sewer service. Because the proposed Project relies on and impacts the groundwater resources on which the District relies for water supply, and proposes an on-site package wastewater treatment plant of the type the District is authorized to operate, the District has a responsible-agency interest in the recirculated hydrology, drainage, and related water-quality and groundwater analysis. These comments are offered to assist the County’s analysis of those matters.

I. Scope of Comments

These comments are deliberately limited. The R-MND was prepared to comply with the June 4, 2026 Order and July 9, 2026 Judgment in *Joshua Tree Village Neighbors v. County of San Bernardino* (San

Bernardino Super. Ct. Case No. CIVSB2513295), which set aside the prior Mitigated Negative Declaration on two grounds: that the County failed to adequately consult the Regional Water Quality Control Board (“RWQCB”) regarding the Waste Water Treatment Facility, and that it failed to adequately analyze potential stormwater impacts and purported detention basin design features. The County has accordingly recirculated only the updated Hydrology analysis (Section X) and associated minor changes. (R-MND, p. 1)

Consistent with that scope, the District’s comments are confined to the recirculated hydrology/drainage material and its interaction with the proposed on-site wastewater facility and the groundwater the District manages. The District takes no position on the land-use merits of the proposed Project, including density, and does not seek to reopen portions of the environmental review left undisturbed by the Court’s judgment.

Additionally, nothing in this letter constitutes, or should be construed as, the District’s endorsement of any ownership, governance, operational, or financing model for the proposed wastewater facility, or the District’s acceptance of ownership or of operational, maintenance, or regulatory responsibility for that facility. Any potential District role remains subject to further technical, legal, and financial review and to Board policy direction, and the District reserves all rights.

II. Comments on the Recirculated Hydrology and Water-Quality Analysis

A. The R-MND should demonstrate that Lot A can physically accommodate both a compliant detention basin and an operable wastewater treatment facility.

The recirculated analysis concludes that post-development peak flows exceed the County’s 90%-of-pre-development standard and that a detention basin capturing a minimum of 20,233 cubic feet (or a basin combined with approximately 1,900 feet of storm drain pipe) must be incorporated. It states that final drainage design is not complete and that a “flexible” combination of basin and pipe may be used “to allow greater flexibility to accommodate the proposed on-site wastewater treatment system on Lot A.” (R-MND, p. 13)

Lot A, however, is only 0.52 acre and is also the parcel designated for the wastewater treatment facility. (R-MND, p. 3) The District requests that the County confirm, with a conceptual site plan and dimensions, that a detention basin sized for the 100-year event and an operable package treatment facility — with required tankage, disposal area, setbacks, access, and maintenance areas — can both physically fit and function on that single lot, rather than deferring that showing to undesigned “final design of the drainage infrastructure.”

Physical accommodation, however, is only the threshold question. It is not enough to show that these facilities can fit on the same parcel; the R-MND should also demonstrate that the detention basin and the wastewater treatment facility can safely and reliably function together on Lot A during significant storm events and under reasonably foreseeable operating and failure conditions.

The analysis should evaluate the interaction among the detention basin, the treatment facility, wastewater effluent disposal and any seepage pits, stormwater flows, and emergency and maintenance access, and should demonstrate how the treatment facility and its disposal components will remain protected, accessible, dry, and operational when the basin is detaining design flows. If the present

configuration may prove unworkable during final design and require an alternative drainage configuration, that uncertainty should be resolved within the environmental review rather than deferred beyond it.

B. The R-MND should present the RWQCB-informed analysis of the interaction among stormwater management, wastewater effluent disposal, and groundwater quality.

The Hydrology section asks whether the proposed Project will violate water quality standards or waste discharge requirements. (R-MND, p. 9.) Co-locating a stormwater detention basin and a wastewater treatment/disposal facility on Lot A raises the question of how detained stormwater, infiltration, and treated-effluent disposal interact, and whether that interaction could affect the underlying groundwater on which the District relies.

Because this is the subject of the RWQCB consultation the Court found the County had not adequately undertaken, the District requests that the recirculated document present that RWQCB-informed analysis and any applicable waste discharge requirements for the on-site treatment and disposal system.

C. The District requests clarification of the redesigned drainage system's effect on groundwater recharge.

The recirculated analysis states that stormwater best management practices will "treat runoff that can be used for groundwater recharge." (R-MND, p. 14) Because the redesigned system now detains and controls flows previously described as leaving the site, the District requests that the County clarify whether, and to what extent, the detention basin (or basin-and-pipe alternative) changes on-site infiltration and recharge to the Joshua Tree subbasin the District relies upon as a water supply source, so that any recharge effect is disclosed rather than left to inference.

D. The Notice of Completion and Environmental Document Transmittal omits project information within the District's area of responsibility.

The Notice of Completion and Environmental Document Transmittal circulated with the recirculated document (SCH No. 2024101105) does not disclose certain information concerning the Project's water and wastewater components. In particular, the transmittal's "Waste Treatment" type and capacity (MGD) fields, and its "Water Facilities" type and capacity fields, are left blank, notwithstanding that the Project includes an on-site package wastewater treatment plant that is central to the recirculated review and to the RWQCB consultation the Court required. So that the RWQCB and other reviewing agencies, and the public, receive accurate notice of the Project's wastewater and water components, the District requests that the County complete and correct that information.

Additionally, based on the District's understanding, as of September 2, 2026, no Report of Waste Discharge (Form 200) has been filed with the RWQCB.

III. Requested Action

As context for its responsible-agency interest, the District notes that the applicant's request for water and wastewater service to the proposed Project remains under staff review. The information provided to date

has not been sufficient for staff to bring a Water or Wastewater Service Availability Letter request before the District's Board of Directors for formal consideration. The District raises this not to prejudge that decision, but because the same informational gaps bear directly on whether the R-MND is adequate for the District, as well as the rest of the public, to evaluate the proposed Project's water-supply, wastewater, and groundwater impacts.

The District respectfully requests that, before acting on the proposed Project, the County (1) provide the additional hydrology, water-quality, and recharge analysis described above, developed in consultation with the RWQCB; and (2) provide the District with notice of any hearing and any notice of determination for the proposed Project. The District cannot support any conclusion that groundwater or water-quality impacts have been adequately addressed until the County, the District, and the public have sufficient information to evaluate whether groundwater resources will be protected.

The District offers these comments to help ensure the recirculated analysis is complete on the matters within its responsible-agency purview and to assist the County in evaluating the hydrology, drainage, wastewater, groundwater, and water-quality issues addressed by the recirculated environmental document. To the extent the whole record ultimately contains substantial evidence of a fair argument that the proposed Project may have a significant environmental effect that will not be avoided or mitigated, the District notes that CEQA's standards for the adequacy of a mitigated negative declaration apply to a recirculated document as to an original one. (Cal. Code Regs., tit. 14, §§ 15073.5 & 15074.)

Thank you for the opportunity to comment. Please direct any questions or requests for coordination to the undersigned.

Respectfully submitted,



Anne Roman, General Manager Pro Tem

cc: Joshua Basin Water District Board of Directors
Colorado River Basin Regional Water Quality Control Board (Region 7)
Governor's Office of Land Use and Climate Innovation, State Clearinghouse (SCH
No. 2024101105)