

October 6, 2026

Comments to the Joshua Basin Water District related to summary of public comments provided during the meeting on September 2, 2026.

Dear Board Members and Staff:

I appreciate the efforts the District has taken to provide an actual summary of the public comments received during District meetings. Most recently, the District has tried to use AI to summarize the comments received during the meeting on September 2, 2026. To see how effective that AI tool was I looked at the way my comments were summarized. Sadly, the AI model did not do an effective job of summarizing my comments to the Board and I expect that is likely true of others.

Summary says:

Erin Gatlin, participating via Zoom, commented on the Lovemore Ranch Council's letter and its assertions in comparison with the recirculated environmental review documents. She indicated that she had concerns with the letter but did not wish to read her full comments due to the late hour.

What I actually said:

This is Erin Gatlin, I don't know if I really need to ...I had done an evaluation of the Lovemore Ranch Counsel's letter to the Board – for JBWD – and sort of compared their letter and their assertions in the recirculated IS text in the exhibit. This letter comes up a little wanting but you are going to send your letter anyway I don't know that I need to read it because it's getting late we can just move on.

One specific example is worth flagging directly: the summary above refers to the “Lovemore Ranch Council’s letter.” There is no “Council.” As the recording confirms, I said “counsel” — the attorneys representing the applicant. That is not a stylistic paraphrase; it is a factual error introduced by the summarization tool.

While I recognize there is a disclaimer at the top of the public comment summary:

The summary is intended to provide a concise overview of the comments received and is not a verbatim transcript. In the event of any discrepancy, the official meeting recording and transcript should be relied upon as the source of the speakers' actual statements.

I'm not asking for a verbatim transcript. But summaries like this become part of the public record, and they should reflect what a speaker actually said. Since the District is using ChatGPT to generate these summaries, I'd ask that a staff member check each AI-generated summary against the recording before it's published, and that speakers have a clear way to request a correction when a summary gets it wrong, as this one did.

I chose not to read my full prepared comments once it was clear your Board would send its own letter to the County regardless. I have attached those written comments here, and I ask that they be entered into the record as well, so it reflects why that decision was the right one.

Thank you for the work that goes into producing these summaries, and for the chance to set the record straight

A handwritten signature in black ink that reads "Erin Gatlin". The script is cursive and fluid, with the first name "Erin" and last name "Gatlin" clearly distinguishable.

Erin Gatlin

Enclosure: Written comments on counsel's September 1, 2026 letter to the JBWD Board regarding the proposed Lovemore Ranch project

ATTACHMENT: Written Comments on Counsel's September 1, 2026 Letter to the JBWD Board

(Prepared for, but not read in full at, the September 2, 2026 JBWD meeting)

In advance of the September 2, 2026 meeting, I reviewed the letter that Allen Matkins Leck Gamble Mallory & Natsis LLP, counsel for Lovemore Ranch, submitted to the Joshua Basin Water District (“JBWD” or “the District”) Board of Directors on September 1, 2026, addressing the District’s Agenda Item 7.B — consideration of a draft comment letter to the County on the R-IS/MND. The letter urges the Board not to authorize submission of that comment letter, on the position that the “technical water and wastewater matters” it raises are already adequately addressed in the record. I checked these assertions against the Recirculated IS text and exhibits, including a page-by-page re-examination of Figure 3 (the site plan counsel cites as demonstrating that Lot A can accommodate both facilities). Several assertions are not consistent with what the R-IS/MND actually contains, and one framing runs against the specific purpose of this recirculation.

Response #1 — “Lot A can physically accommodate both a compliant detention basin and an operable wastewater treatment facility.” The letter states that Figure 3 (R-IS/MND, p. 6 of 16) “includes a detailed visual illustrating” that Lot A can accommodate both facilities. On direct re-examination, Figure 3 is the “Site Plan, Tentative Tract Map 20443” — it shows parcel boundaries, streets, grading, drainage easements, and cross-sections, together with a generic “SEWER: SEPTIC” utility note. It does not depict a wastewater-treatment-plant footprint, does not show seepage-pit locations, and does not illustrate how those elements would coexist with the detention basin. Describing this exhibit as a “detailed visual” demonstrating that both facilities fit together overstates its actual content.

The letter also cites specific technical figures not found anywhere in the Section X hydrology text or its reference list: five seepage pits (with an option for five more), each roughly 10 feet long and 1.5–4 feet deep; an average daily design flow of approximately 16,000 gallons; and a “GEOCON Percolation Study, 9/25/2023” describing five borings to 30–75.5 feet with groundwater found more than 520 feet down. That percolation study has not been provided in this review and its contents cannot be independently confirmed. What can be confirmed is that it is not cited in the Section X substantiation or references of either the October 2024 or July 2026 Initial Study reviewed here. If this analysis exists but was never incorporated into the circulated CEQA document, it was not part of what the public and RWQCB were actually asked to review — the opposite of what CEQA’s disclosure process requires.

A recurring technical error: the letter twice refers to “the 20,233 CFS detention basin.” CFS (cubic feet per second) is a flow-rate unit; the record figure is 20,233 cubic feet (CF), a volume. Minor in isolation, but notable in a letter arguing for the sufficiency of the record’s technical precision.

Response #2 — “RWQCB-informed analysis of the interaction among stormwater management, wastewater effluent disposal, and groundwater quality.” The letter offers a new technical claim — that infiltration from a full detention basin drains out over approximately three hours and is “minimal” — that does not appear in the Section X text reviewed. Section X’s own groundwater-related content is limited to the WQMP-applicability statement and the note that a future NPDES/RWQCB permit will be required before grading. This response does not point to analysis

that exists in the R-IS/MND; it supplies new analysis outside the document, in a letter recommending against a request that this analysis be documented.

Response #3 — request for clarification on the redesigned drainage system’s effect on groundwater recharge. This response relies on the same undocumented analysis addressed in Response #2 and is subject to the same gap.

Response #4 — request for additional hydrology/water-quality/recharge analysis developed in consultation with RWQCB, before the County acts. This is the most significant inconsistency. The letter states there is “no additional hydrology, water-quality or recharge analysis that need be provided,” with further RWQCB/DEHS analysis to occur only “if required” for design approval — asking the Board not to request the very consultation a court already found missing. As counsel undoubtedly knows, this entire recirculation exists because a Writ of Mandate found the County had not adequately consulted RWQCB on precisely this subject: the interaction between the revised drainage design, the wastewater treatment plant, and groundwater. Persuading JBWD not to submit comments on that exact topic, during the comment period that exists specifically to cure that defect, is in tension with the purpose of the recirculation. This is independent of whether counsel’s substantive no-contamination position is ultimately correct. A responsible agency declining to weigh in on the specific question a court identified as inadequately consulted is not a neutral outcome; it leaves open the same gap the County was just found deficient on.

What the letter gets right: its description of Lot A’s programmed uses (wastewater treatment facility, other communal utilities, staff quarters) matches the R-IS/MND’s project description, and its quotation of the Option 1/Option 2 “flexible design” language from page 13 is an accurate quotation. Where it goes wrong is in the characterization — treating a contingency clause expressly “conditioned on final approval by both the RWQCB and DEHS” as though it already demonstrates adequate accommodation, when a hedge stating that “if issues arise” the Project “could utilize a combination” of approaches is, on its own terms, an acknowledgment of unresolved design uncertainty rather than proof that the uncertainty has been resolved. This is the same deferred-mitigation problem we’ve raised with the County directly: treating a contingency as though it were already resolved. It shows up here in counsel’s own framing of the record.

Given the significant discrepancies between what is actually in the R-IS/MND and what counsel asserts is addressed in it, it is crucial that the District submit its letter to the County. These inaccurate statements from counsel should not stand unchallenged.