



Post Office Box 24
Joshua Tree CA 92252
www.mbconservation.org

September 14, 2026

County of San Bernardino
Land Use Services

Via Email Elena.Barragan@lus.sbcounty.gov
 Paul.Gonzales@lus.sbcounty.gov
 Dawn.Rowe@bos.sbcounty.gov

Re: *PROJ-2021-00169 TTM 20443 APN: 0602-361-04*

Dear Land Use Services,

Based on our examination of the record, the number of lots allowed in the Lovemore Ranch development was determined using gross density calculations.

We believe the question below warrants your timely consideration:

According to our reading of the Development Code §83.02.050 (e)(1) the Lovemore subdivision maximum allowed “units” should be calculated using net density (“net area”) calculations since it is in RS zoning.

The project: *Initial Study PROJ-2021-00169 TTM 20443 APN: 0602-361-04*
The Project Site is currently zoned Single Residential (RS) within the Land Use Category of Low Density Residential (LDR).

The SB County Code:

https://codelibrary.amlegal.com/codes/sanbernardino/latest/sanberncty_ca/0-0-0-169293

§ 83.02.050 Parcel Area Measurements and Exceptions.

(e) *Parcel Area Calculations.* The minimum parcel area requirements identified in [Division 2](#) (Land Use Zoning Districts and Allowed Land Uses) shall be calculated as follows:

(1) Urban Areas. The area of parcels within the following urban land use zoning districts shall be that area included within the perimeter of the legal boundaries of the subject property, exclusive of any area within abutting planned rights-of-way (net area): **Single Residential (RS) where lands are designated for lots smaller than one acre** as measured herein, Multiple Residential (RM), Special Development (SD) and all commercial, industrial and institutional land use zoning districts.

(2) Rural Areas. The area of parcels within the following rural land use zoning shall be that area included within the perimeter of the legal boundaries of the subject property inclusive of that area within the planned rights-of-way up to the centerline, not to exceed 60 feet from the legal boundary of the lot (gross area): Resource Conservation (RC), Agriculture (AG), Rural Living (RL), Floodway (FW) and Open Space (OS). Within the RS-1 (Single Residential- one acre minimum lot size) Land Use Zoning District, parcels shall be measured based on gross area as defined herein, provided that when any one acre lot is created within an area not served by a municipal water and sewer system, each lot shall be configured so as to meet applicable requirements for an individual well and septic system.

The area of the roads and the open spaces (Lot A and Lot B) total approximately 5.0 acres. 18.49 acres minus 5 acres = 13.49 acres.

Thus, you have 13.49 acres to subdivide into the maximum density of 4 units per acre. $13.49 \text{ acres} \times 4 \text{ units} =$ **approximately 54 units maximum allowed** (The calculations we have made are approximate and require further analysis and clarification on rounding up, or down when a fraction of a unit is calculated).

Additionally, we wish to emphasize the following:

Minimum Lot Size

7,200 sq.ft. (.165 acre) is the minimum lot size for RS – Residential Single.

§ 82.04.040 Residential Land Use Zoning District Allowed Uses and Permit Requirements

Table 82-8C Residential Land Use Zoning District Minimum Lot Size, Desert Region

This is a separate issue and must not be confused with:

Maximum Density

ONLY 4 units per acre are allowed. The smallest lot can be 7,200 sq. ft. but the remaining area of that acre cannot be divided into more than 3 lots per net area calculation.

§§ 82.04.060 Residential Land Use Zoning District Site Planning and Building Standards

Table 82-9C Residential Use Zoning District Development Standards, Desert Region.

We believe an explanation is required to justify how Lovemore Ranch, as shown within the TTM 20443 map, complies with San Bernardino County Development Code § 83.02.050(e)(1) where, based on our calculation, a maximum of approximately 54 units would be allowed.

Given that the recirculated IS MND has not been certified by the County, this project has not yet been entitled.

We believe the question above warrants resolution before any project approval or certification of the environmental documents.

Please include this letter within the project record and please acknowledge receipt of this letter.

Thank you for your consideration.

Steve Bardwell, President, Morongo Basin Conservation Association