



Division of Environmental Health Interoffice Memorandum

To: Steve Lazar, Senior Planner

From: Joey Whittlesey, Senior Environmental Health Specialist

Date: January 8, 2025

Subject: **501T3 Theater Camp Conditional Use Permit
APN 033-271-007; PLN-2024-19010**

Re: **DEH Comments on Conditional Use Permit Proposing Fifth Annual Event
at County Line Ranch**

The Division of Environmental Health (DEH) has reviewed the subject conditional use permit application and provides the following comments in response to the information described in the Operations Plan, dated October 20, 2024, provided by the applicant:

Water Supply and Distribution

1. Water System Jurisdiction.

The Operations Plan states “501T3 will work with Humboldt County Environmental Health to ensure compliance of activities” regarding use of the water system supplying County Line Ranch. Please be advised that as of October 30, 2024, the State Water Resources Control Board Division of Drinking Water (DDW) has determined County Line Ranch to be a public water system subject to regulatory oversight of the DDW Klamath District field office.

DEH recommends the applicant obtain DDW approval to use County Line Ranch public water system in support of the event prior to CUP approval.

Waste Water Disposal & Sanitary Facilities

1. Regional Waterboard Oversight

The Operations Plan describes the onsite wastewater treatment system (OWTS) serving County Line Ranch as enrolled in a program with the North Coast Regional Water Quality Control Board (NCRWQCB), presumably the Monitoring and Reporting Program. NCRWQCB Waivers to Discharge Requirements as well as Monitoring and Reporting Program Orders are periodically subject to expiration and renewal.

Applicant must provide DEH documentation that the County Line Ranch OWTS possesses current enrollment in NCRWQCB's Monitoring and Reporting Program.

2. Hauled Wastewater

The Operations Plan states "a local service provider collects and stores wastewater on-site before it is hauled off-site to an approved wastewater facility." Applicant must provide the following clarifying information:

- a. Provide a site plan detailing the location(s) and method(s) in which wastewater is stored to be hauled offsite by a local service provider (i.e., only portable toilet wastewater or additional sources?).
- b. Identify the local service provider contracted to collect and dispose wastewater, providing a contract or a "will-serve" letter from the service provider to DEH; the service provider must possess a permit to operate within Humboldt County at minimum 30 days in advance of the event.
- c. Identify the approved wastewater disposal facility to be utilized by the contracted service provider; adequate identification shall include a "will-serve" letter from the wastewater disposal facility confirming capacity to accept wastewater generated by the event.

3. Portable Toilet Inventory

The Operations Plan states "there will be up to 75 portable toilet units (including ADA units) placed around the venue by a licensed service provider, maintaining a ratio of 40-50 people per toilet unit."

Please be advised that the event must be supported by a minimum of one portable toilet for every 50 attendees (including artists, crew, performers, vendors, volunteers, and general attendees) and maintained by the contracted licensed service provider at a frequency adequate to prevent waste overflow and depletion of sanitary supplies. Applicant must update the Operations Plan to accurately reflect this minimum requirement, providing a map showing locations where the portable toilets and handwashing stations will be maintained.

Solid Waste Disposal and Recycling

1. Solid Waste Management Details

The Operations Plan describes 501T3 Theater Camp as a "pack it in, pack it out" event, encouraging attendees to retain and dispose of their own solid waste offsite; the plan also describes solid waste generation by event staff and food vendors.

Applicant must update the Operations Plan to include a contingency plan in the event that attendees fail to retain and dispose of their own solid waste offsite. Additionally, applicant must describe where the solid waste generated by the event crew and food vendors will be stored onsite and to which approved solid waste disposal facility the accumulated waste will be disposed offsite during and after the event.

Food Service

1. Temporary Food Facility Permitting

The Operations Plan states “all food vendors operating in Humboldt County will be subject to Humboldt County Division of Public Health operating standards and criteria.

Applicant must obtain a Temporary Food Facility Coordinator Permit from DEH at minimum of 30 calendar days in advance of the event and ensure each food and drink vendor operating in Humboldt County obtain an individual Temporary Food Facility Permit at minimum of 14 calendar days in advance of the event.

Hazardous Waste

1. General Hazardous Waste Requirements

If any amount of hazardous waste is generated onsite, applicant must characterize and dispose of all hazardous waste using a licensed hazardous waste hauler and a licensed hazardous waste disposal facility. As applicable, applicant shall provide disposal receipts to Humboldt County Environmental Health’s Hazardous Materials Unit.