

McClenagan, Laura

Subject: FW: APPS #16141: Doja Gold, LLC - Follow-up on DEH Concerns - Item E-13

From: Johnson, Cliff <CJohnson@co.humboldt.ca.us>

Sent: Wednesday, July 28, 2021 4:15 PM

To: McClenagan, Laura <lmcclenagan2@co.humboldt.ca.us>; Lippre, Suzanne <SLippre@co.humboldt.ca.us>

Subject: FW: APPS #16141: Doja Gold, LLC - Follow-up on DEH Concerns - Item E-13

Hi Laura, Can you please forward this email to the Planning Commissioners and let them know that we will discuss this and include a new recommended condition per this email in our presentation tomorrow night. This is regarding item E-13 16141 Doja Gold, LLC.

Thanks

From: Whittlesey, Joseph <jwhittlesey@co.humboldt.ca.us>

Sent: Tuesday, July 27, 2021 4:21 PM

To: Johnson, Cliff <CJohnson@co.humboldt.ca.us>

Subject: APPS #16141: Doja Gold, LLC - Follow-up on DEH Concerns

Hi Cliff,

The subject project is scheduled to go before the Planning Commission on 7/29/21. After reviewing the Staff Report prepared for PLN-2020-16141, it appears that the Recommended Conditions of Approval do not adequately address DEH's concerns regarding the wastewater aspects of this project.

The Staff Report's Executive Summary describes the applicant's plans to utilize one travel trailer for onsite wastewater treatment system which will be serviced by a local portable toilet service with an ongoing condition to provide receipts for portable toilet service to the Planning Department (Condition B3). Based on this description, it is presumed that the travel trailer will be used analogously to a vault/holding tank. Humboldt County Code (HCC) 613-4(a) prohibits the use of vaults/holding tanks with exceptions for specific cases, none of which are applicable to this project. Therefore, DEH finds the proposal to use the travel trailer as a vault to address wastewater demands for this project to be inadequate and requests the project pursue a method of wastewater management in compliance with HCC. In this case, use of portable toilets, establishing Tier 0 status of the existing OWTS serving the dwelling, or installation of a new permitted OWTS would accomplish this.

DEH originally recommended conditional approval for this project with the following comments:

"Applicant must demonstrate that a properly functioning onsite wastewater treatment system serves the operation. This can be accomplished by providing DEH with an assessment of the existing system performed by a qualified consultant that the existing system complies with the State RWQCB definition of a Tier 0 system."

DEH requests these comments be incorporated into the Staff Report as an additional Recommended Condition of Approval. Alternatively, HCC allows use of portable toilets for temporary-use activities such as field labor operations. If this option is preferable, the following comments should be incorporated (or combined with our previous comments) instead:

"Seasonal cultivation without processing may use portable toilets to serve the operation. Permittee shall provide portable toilet(s) to cultivation areas, meeting appropriate setbacks per Humboldt County Code, or install a permitted onsite wastewater treatment system associated with a permitted structure."

Thank you,

Joey Whittlesey

Senior Environmental Health Specialist

[Land Use Program](#)

[Division of Environmental Health](#)

100 H Street, Suite 100, Eureka, CA 95501

Phone: (707) 268-2240 – Fax: (707) 441-5699