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## North Coast Regional Water Quality Control Board

January 16, 2026

Dear Kelsey Fletterick:

Site: Roger's Garage (Former), 1622 Old Arcata Road, Arcata, California  
Case No. 1NHU804 (CR No. 2010044)

Subject: Interagency Meeting Follow Up

North Coast Regional Water Quality Control Board (Regional Water Board) met with the City of Arcata (City) on December 8, 2025, per the City's request to discuss the status and soil remediation requirements for Danco's planned residential redevelopment located at 1622 Old Arcata Road (Site).

LACO Associates submitted a *Metals Excavation Workplan* (Workplan) dated May 25, 2005, to the Regional Water Board. The Workplan discussed remaining elevated levels of copper, lead, zinc and cadmium above preliminary remediation goals according to planned Site use at the time. The Workplan states that metals-impacted soil will be excavated to a depth of 1.5 feet below ground surface or until screening levels have been met.

Planned Site use has changed since 2005, therefore, the Regional Water Board is requiring the following residential screening levels for metal impacted soil currently remaining on-site:

- Copper – 3,100 mg/kg
- Lead - 80 mg/kg<sup>2</sup>
- Zinc - 23,000 mg/kg
- Cadmium - 7.1 mg/kg

As stated in the Regional Water Board letter dated September 29, 2025, and discussed during the meeting on December 8, 2025, the following work is required at the Site:

- Groundwater confirmation sampling at MW-6 for TPHg, TPHd, BTEX, EDB, 1,2-DCA, tetraethyl lead, and cadmium, chromium, total lead, nickel and zinc due to unknown location at the time of most recent sampling event
- Vapor survey to determine whether vapor mitigation is necessary beneath any planned residential structures. The vapor survey should be submitted to the Regional Water Board for review. If soil vapor samples exceed residential

screening levels then a vapor mitigation plan must be submitted and approved by the Regional Water Board. If directed, vapor mitigation must be in place and shown by sub-slab soil gas samples and paired indoor samples to be effective in reducing levels to below screening levels prior to occupancy.

- Collection of water samples at:
  - a) the drop inlet at or on 1632 Old Arcata Road, and
  - b) the RCP discharge point onto the Jacoby Creek School property.Samples should be analyzed for TPHg, TPHd, benzene, toluene, ethylbenzene, tetraethyl lead, and cadmium, chromium, total lead, nickel and zinc.
- Stormwater samples should be collected and tested for: copper, lead, zinc, cadmium, TPHg, TPHd, BTEX, EDB, 1,2-DCA and nickel due to remaining levels of contamination onsite. Stormwater samples should also be sampled for total dissolved solid (TDS) and pH. If samples are above exceedance levels, additional work with the NPDES stormwater unit should be done to ensure that discharges are below exceedance levels.

If you have any questions regarding this request or need clarification, please contact me at [Vanessa.Davis@waterboards.ca.gov](mailto:Vanessa.Davis@waterboards.ca.gov) or at (707) 576-2802.

Sincerely,

Vanessa Davis  
Engineering Geologist

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