Department of Toxic Substances Control

Yana Garcia
Secretary for
Environmental Protection

Katherine M. Butler, MPH, Director
8800 Cal Center Drive
Sacramento, California 95826-3200
dtsc.ca.gov

Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

August 29, 2025

David E. McCready
Assistant Superintendent, Business Services
Paradise Unified School District
6696 Clark Road
Paradise, CA 95969
dmccready@pusdk12.org

RE: MITIGATED NEGATIVE DECLARATION FOR PARADISE HIGH SCHOOL DEVELOPMENT AT 1023 ELLIOT ROAD PROJECT DATED AUGUST 5, 2025, STATE CLEARINGHOUSE NUMBER 2025080185

Dear David E. McCready,

The Department of Toxic Substances Control (DTSC) reviewed the Mitigated Negative Declaration (MND) for Paradise High School (PHS) Development at 1023 Elliot Road Project (Project). The proposed Project would occur on a 1.58-acre parcel located at 1023 Elliot Road, approximately 500 feet east of the PHS campus. The proposed Project would expand the PHS campus and would include a new livestock farming area and a 1,728-square-foot barn for the agricultural education program for PHS students. As part of the Future Farmers of America program, students would raise livestock which would include pigs only, keeping pens clean, and ensuring the health of the livestock. The proposed barn building would include eight stalls for livestock and an accessible walk pathway that would run through the middle of the barn and lead to the outside. The proposed Project would connect to existing underground utilities. No mechanical equipment, including HVAC, compressor, or farm equipment, would be located at the Project site, nor would any diesel-powered equipment be required during operation. The proposed Project would be exclusively used by the PHS agricultural program and would

serve the existing students at the high school. Student capacity at PHS would not increase as a result of the proposed Project, and no other uses are proposed. DTSC recommends and requests consideration of the following comments:

1. If the district plans to use California Department of Education (CDE) State funds for the Project, then the district shall comply with the requirements of Education Code (EDC), §17210, §17213.1, and §17213.2, unless otherwise specifically exempted under section §17268. If the district is not using CDE State funds for the Project, or is otherwise specifically exempt under section §17268, DTSC recommends the district continue to investigate, clean up the Site under the oversight of Butte County and in concurrence with all applicable DTSC guidance documents, if necessary. For more information on the CDE State funding, please visit the Office of Public-School Construction webpage. A local education agency may also voluntarily request the CDE site/plan approval for locally funded site acquisitions and new construction projects. In these cases, CDE will require DTSC to review and approve prior to its final approval, except when exempt under section 17268.
2. All imported soil/fill material should be tested to assess any contaminants of concern meet screening levels as outlined in DTSC's Preliminary Endangerment Assessment Guidance Manual. Additionally, DTSC advises referencing the DTSC Information Advisory Clean Imported Fill Material Fact Sheet if importing fill is necessary. To minimize the possibility of introducing contaminated soil/fill material, there should be documentation of the origins of the soil/fill material and, if applicable, sampling be conducted to ensure that the imported soil/fill material are suitable for the intended land use. The soil sampling should include analysis based on the source of the soil/fill and knowledge of prior land use.

DTSC appreciates the opportunity to comment on the Paradise High School Development at 1023 Elliot Road Project. If you would like to proceed with DTSC's school environmental review process, please visit DTSC's Evaluating & Clean-up

School 3-Step Process to begin a Phase I Environmental Site Assessment. If you have any questions or would like clarification on DTSC's comments, please respond to this letter or via our CEQA Review email for additional guidance.

Sincerely,



Tamara Purvis
Associate Environmental Planner
HWMP - Permitting Division – CEQA Unit
Department of Toxic Substances Control
Tamara.Purvis@dtsc.ca.gov

cc: (via email)

Governor's Office of Land Use and Climate Innovation
State Clearinghouse
State.Clearinghouse@lci.ca.gov

Alen Estrada-Rodas
Senior Associate I
PlaceWorks / Consulting Firm
aestradarodas@placeworks.com

Lisa Holcomb
Hazardous Substance Engineer
SMRP – Cleanup Program
Department of Toxic Substances Control
Lisa.Holcomb@dtsc.ca.gov

Dave Kereazis
Associate Environmental Planner
HWMP-Permitting Division – CEQA Unit
Department of Toxic Substances Control
Dave.Kereazis@dtsc.ca.gov

Scott Wiley
Associate Governmental Program Analyst
HWMP - Permitting Division – CEQA Unit
Department of Toxic Substances Control
Scott.Wiley@dtsc.ca.gov