Department of Toxic Substances Control

Yana Garcia
Secretary for
Environmental Protection

Katherine M. Butler, MPH, Director
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Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

October 22, 2025

Eric Smith
Director of Facilities and Safety
Encinitas Union School District
101 Rancho Santa Fe Road
Encinitas, CA 92024
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RE: NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE PAUL ECKE CENTRAL ELEMENTARY SCHOOL REBUILD PROJECT DATED OCTOBER 16, 2025, STATE CLEARINGHOUSE NUMBER 2025100767

Dear Eric Smith,

The Department of Toxic Substances Control (DTSC) reviewed the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Paul Ecke Central Elementary School Rebuild Project (Project). The district is proposing a complete reconstruction of the campus. The number of classrooms would decrease from 33 to 30 but the number of students, staff, and teachers would remain unchanged. 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 San Diego 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. If buildings or other structures are to be demolished on any Project sites included in the proposed Project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition, and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with DTSC's Preliminary Endangerment Assessment (PEA) Guidance Manual.
3. All imported soil/fill material should be tested to assess any contaminants of concern meet screening levels as outlined in DTSC's PEA 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 NOP of a DEIR for the Paul Ecke Central Elementary School Rebuild 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,

Dave Kereazis
Associate Environmental Planner
HWMP - Permitting Division – CEQA Unit
Department of Toxic Substances Control
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cc: (via email)

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