



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

Katherine M. Butler, MPH, Director
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Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

April 14, 2026

David McCready
Assistant Superintendent, Business Services
Paradise Unified School District
6696 Clark Road
Paradise, CA 95969
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RE: NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE PARADISE HIGH SCHOOL EXPANSION PROJECT DATED MARCH 16, 2026, STATE CLEARINGHOUSE NUMBER [2026030647](#)

Dear David McCready,

The Department of Toxic Substances Control (DTSC) reviewed the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Paradise High School Expansion Project (Project). The proposed Project would occur on a 7.31-acre Project site, and would consist of three components, including the implementation of one new parking lot, one new agricultural building, and a new athletic stadium and practice sports field. The proposed Project would utilize two parcels for the new parking lot, two parcels for the implementation of the new athletic stadium that will also be used as practice fields, and one parcel for the new agricultural building. DTSC recommends and requests consideration of the following comments:

1. If the Paradise Unified School District (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 [§17268](#). If the District is not using CDE State funds for the Project, or is otherwise specifically exempt

under [§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. 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. DTSC recommends all imported soil/fill material be tested to ensure all COCs meet screening levels as outlined in [DTSC's PEA Guidance Manual](#). Furthermore, 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 would like to thank you for the opportunity to comment on the NOP of a DEIR for the Paradise High School Expansion Project. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you would like to proceed with DTSC's school environmental review

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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
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HWMP-Permitting Division – CEQA Unit
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cc: (via email)

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