

Paradise Unified School District

PARADISE HIGH SCHOOL EXPANSION PROJECT

July 2026 | Draft Environmental Impact Report

State Clearinghouse No. 2026030647



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for Paradise Unified School District

Paradise Unified School District

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EXECUTIVE SUMMARY

ES.1 INTRODUCTION

This executive summary has been prepared in compliance with the California Environmental Quality Act (CEQA) Guidelines Section 15123. This Environmental Impact Report (EIR) addresses the environmental effects associated with the implementation of the Paradise High School Expansion Project (proposed project). CEQA requires that local government agencies consider the environmental consequences before acting on projects over which they have discretionary approval authority. An EIR analyzes potential environmental consequences to inform the public and support informed decisions by local and State governmental agency decision makers.

This Draft EIR (DEIR) has been prepared pursuant to the requirements of CEQA and the Paradise Unified School District's (PUSD or District) CEQA procedures. The District, as the lead agency, has reviewed and revised all submitted drafts, technical studies, and reports as necessary to reflect its own independent judgment, including reliance on District technical personnel from other departments and review of all technical subconsultant reports.

ES.2 ENVIRONMENTAL PROCEDURES

This DEIR has been prepared pursuant to CEQA and the CEQA Guidelines to assess the environmental effects associated with implementation of the proposed project as well as anticipated future discretionary actions and approvals. CEQA established six main objectives for an EIR:

1. Disclose to decision makers and the public the significant environmental effects of proposed activities.
2. Identify ways to avoid or reduce environmental damage.
3. Prevent environmental damage by requiring implementation of feasible alternatives or mitigation measures.
4. Disclose to the public reasons for agency approval of projects with significant environmental effects.
5. Foster interagency coordination in the review of projects.
6. Enhance public participation in the planning process.

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An EIR is the most comprehensive form of environmental documentation in CEQA and the CEQA Guidelines; it is intended to provide an objective, factually supported analysis, and full disclosure of the environmental consequences of a proposed project with the potential to result in significant, adverse environmental impacts.

An EIR is one of various decision-making tools used by a lead agency to consider the merits and disadvantages of a project that is subject to its discretionary authority. Before approving a proposed project, the lead agency must consider the information in the EIR, determine whether the EIR was prepared in accordance with CEQA and the CEQA Guidelines, determine that it reflects the independent judgment of the lead agency, adopt findings concerning the project's significant environmental impacts and alternatives, and adopt a statement of overriding considerations if significant impacts cannot be avoided.

ES.2.1 Draft EIR Organization

Executive Summary. Summarizes the background and description of the proposed project, the format of this DEIR, project alternatives, any critical issues that need to be resolved, and the potential environmental impacts and recommended mitigation measures identified for the project.

Chapter 1: Introduction. Describes the purpose of this DEIR, background on the project, the notice of preparation, the use of incorporation by reference, and Final EIR certification.

Chapter 2: Project Description. Provides a detailed description of the project, including its objectives, its area and location, approvals anticipated to be required as part of the project, necessary environmental clearances, and the intended uses of this DEIR.

Chapter 3: Environmental Analysis. Each environmental topic is analyzed in a separate section that discusses: the applicable regulatory framework; existing conditions; the significance criteria used to determine if a significant impact would occur; the methodology to identify and evaluate the potential impacts of the project; the potential adverse and beneficial effects of the project; the level of impact significance with and without mitigation; and the potential cumulative impacts of the proposed project and other existing, approved, and proposed projects in the area.

Chapter 4: Alternatives to the Proposed Project. Describes the alternatives and compares their impacts to the impacts of the proposed project.

Chapter 5: Other CEQA Considerations. Provides a discussion of effects found not to be significant, significant and unavoidable impacts, significant irreversible changes to the environment, and growth-inducing effects.

Chapter 6: Report Preparers and Organizations Consulted. Includes a list of people and organizations that prepared or were contacted during the preparation of this Draft EIR.

Appendices. The appendices for this document include the following supporting documents:

- Appendix A: Notice of Preparation and Scoping Comments
- Appendix B: Air Quality and Greenhouse Gas Emissions
- Appendix C: Biological Resources Evaluation
- Appendix D: Cultural and Tribal Cultural Resources
- Appendix E: Phase I Environmental Site Assessment
- Appendix F: Noise and Vibration Assessment
- Appendix G: Transportation Impact Study

ES.2.2 Type and Purpose of this Draft EIR

As described in the CEQA Guidelines, different types of EIRs are used for varying situations and intended uses.

This Draft EIR has been prepared as a “Project EIR,” defined by CEQA Guidelines Section 15161 (California Code of Regulations, Title 14, Division 6, Chapter 3). This type of EIR examines the environmental impacts of a specific development project and should focus primarily on the changes in the environment that would result from the development project. The DEIR shall examine all phases of the project, including planning, construction, and operation.

ES.3 PROJECT LOCATION

The Paradise High School campus is located at 5911 Maxwell Drive, in the Town of Paradise, Butte County. The project site is located near the southern boundary of the Paradise HS campus and includes five Assessor’s Parcel Numbers: 053-111-014, -015, -028, -030, and -034. The project site is approximately 6 miles west of State Route (SR) 70, approximately 6.6 mile east of SR-32, and approximately 9.5 miles north of SR-99.

The Town of Paradise is located in eastern Butte County in Northern California, within the foothills of the Sierra Nevada approximately 10 miles east of the City of Chico.

ES.4 SUMMARY OF THE PROPOSED PROJECT

The project is proposed on a 7.31-acre site and would consist of three components—a new parking lot, a new agricultural building, and a new football stadium and practice sports field. The proposed project would utilize two parcels for the new parking lot, two parcels for the new

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football stadium that will also be used as practice fields, and one parcel for the new agricultural building.

ES.5 SUMMARY OF PROJECT ALTERNATIVES

CEQA Guidelines Section 15126.6(a) states that an EIR must address “a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives.” The alternatives in this Draft EIR were based, in part, on their potential to reduce or eliminate the impacts determined to be potentially significant for implementation of the proposed project (see Table ES-1, *Summary of Significant Environmental Impacts and Mitigation Measures*). The project alternatives were not reviewed for financial feasibility. Project alternatives are assessed in further detail in Chapter 4, *Alternatives to the Proposed Project*.

ES.5.1 No Project Alternative

CEQA Guidelines Section 15126.6(e) requires that a “No Project” Alternative be evaluated. This analysis must discuss the existing site conditions as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved. Under the No Project Alternative, the proposed improvements at Paradise HS would not be implemented. The project site on campus would not have permanent lighting, and students would continue to practice and play home games at an off-site location during the evening and winter months. This alternative would not meet any of the project objectives.

ES.5.2 Agricultural Building on Alternate Site Alternative

The Agricultural Building on Alternate Site Alternative (Alternative 2) would result in the development of the proposed agricultural building on an alternate site. The proposed agricultural building would be constructed on an alternate District-owned site at 1023 Elliott Road, approximately 500 feet east of the project site, across Maxwell Drive. The agricultural building would be the same size as the building proposed as part of the proposed project, but would not include a gravel parking lot. Under this alternative, the agricultural building would continue to be intended for the exclusive use of the Paradise HS agricultural program, but from the alternative 1023 Elliott Road location.

Under the Alternative Development Area Alternative, the project site would continue to be developed with the proposed parking lot and stadium/practice field only. As a result, this alternative would spread the overall scale and intensity of development at the project site across two District-owned sites while continuing to maintain the educational benefits of the

agricultural program and providing additional dedicated athletic space for Paradise HS athletic programs.

ES.5.3 Practice Field Only (No Stadium) Alternative

Under the Practice Field Only (No Stadium) Alternative (Alternative 3), the project site would be developed with the proposed agricultural building and associated infrastructure, parking lot, and practice field only, eliminating the stadium component proposed. The practice field would continue to be developed on the project site but would not include a new PA system, bleachers, concession stand, or restrooms. The field would be used for sports practices and physical education for students at Paradise HS only. Games would continue to be held at the existing Paradise HS stadium, and the existing athletics schedule would remain as is.

ES.6 ISSUES TO BE RESOLVED

Section 15123(b)(3) of the CEQA Guidelines requires that an EIR contain issues to be resolved, including the choice among alternatives and whether or how to mitigate significant impacts. For the proposed project, the major issues to be resolved include decisions by the lead agency as to:

1. Whether this DEIR adequately describes the environmental impacts of the project.
2. Whether the benefits of the project override those environmental impacts which cannot be feasibly avoided or mitigated to a level of insignificance.
3. Whether the proposed land use changes are compatible with the character of the existing area.
4. Whether the identified goals, policies, or mitigation measures should be adopted or modified.
5. Whether there are other mitigation measures that should be applied to the project besides the mitigation measures identified in the DEIR.
6. Whether there are any alternatives to the project that would substantially lessen any of the significant impacts of the proposed project and achieve most of the basic project objectives.

ES.7 AREAS OF CONTROVERSY

In accordance with Section 15123(b)(2) of the CEQA Guidelines, the DEIR summary must identify areas of controversy known to the lead agency, including issues raised by agencies and the public. Prior to preparation of the DEIR, the District issued a Notice of Preparation (NOP) on March 13, 2026. The CEQA-mandated scoping period for this DEIR was between March 13, 2026, and April 13, 2026, during which interested agencies and the public could submit

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comments about the potential environmental impacts of the proposed project. During this time, the District received comment letters from the Department of Forestry and Fire Protection, the Native American Heritage Commission, the California Department of Fish and Wildlife, and the Departments of Toxic Substances Control. Appendix A, *Notice of Preparation and Scoping Comments*, of this Draft EIR contains the NOP as well as the comments received by the District in response to the NOP.

The following list includes issues that are likely to be of particular concern to agencies and interested members of the public during the environmental review process based on the input received during the scoping process.

- Aesthetics
- Air Quality
- Biological Resources
- Hydrology and Water Quality
- Noise
- Transportation
- Wildfire

ES.8 SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Chapter 5, *Other CEQA Considerations*, concluded impacts to agriculture and forestry resources, energy, land use and planning, mineral resources, population and housing, and recreation, would not be significant.

Table ES-1, *Summary of Significant Environmental Impacts and Mitigation Measures*, summarizes the conclusions of the environmental analysis in this DEIR. Impacts are identified as significant or less than significant and mitigation measures are identified for all significant impacts. The level of significance with imposition of the mitigation measures is also presented.

Table ES-1 Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
AESTHETICS			
Impact AES-a): The proposed project would not have a substantial adverse effect on a scenic vista.	NI	No mitigation measures are required.	NI
Impact AES-b): The proposed project would not substantially degrade the view from a scenic highway, including, but not limited to, trees, rock outcroppings, and historic buildings.	NI	No mitigation measures are required.	NI
Impact AES-c): The proposed project is in a nonurbanized area, and the project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.).	LTS	No mitigation measures are required.	LTS
Impact AES-d): The proposed project would not expose people on- or off-site to substantial light or glare which would adversely affect day or nighttime views in the area.	LTS	No mitigation measures are required.	LTS
AGRICULTURE AND FORESTRY RESOURCES			
Impact AG-a): The proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the	NI	No mitigation measures are required.	NI

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Table ES-1 Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
California Resources Agency, to non-agricultural use.			
Impact AG-b): The proposed project would not conflict with existing zoning for agricultural use, or a Williamson Act contract.	NI	No mitigation measures are required.	NI
Impact AG-c): The proposed project would not conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)).	LTS	No mitigation measures are required.	LTS
Impact AG-d): The proposed project would not result in the loss of forest land or conversion of forest land to non-forest use.	LTS	No mitigation measures are required.	LTS
Impact AG-e): The proposed project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.	LTS	No mitigation measures are required.	LTS

Table ES-1 Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
AIR QUALITY			
Impact AQ-a): The proposed project would not conflict with or obstruct implementation of the applicable air quality plan.	LTS	No mitigation measures are required.	LTS
Impact AQ-b): The proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.	LTS	No mitigation measures are required.	LTS
Impact AQ-c): The proposed project would not expose sensitive receptors to substantial pollutant concentrations.	LTS	No mitigation measures are required.	LTS
Impact AQ-d): The proposed project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.	LTS	No mitigation measures are required.	LTS
BIOLOGICAL RESOURCES			
Impact BIO-a): The proposed project could have a substantial effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.	PS	Mitigation Measure BIO-1: Preconstruction Avian Survey. To the extent feasible, in order to minimize potential impacts to avian species, vegetation clearing or ground-disturbing activities should be conducted during the non-breeding season (September 1 to February 14) to limit impacts to nesting birds. If vegetation clearing or ground-disturbing activities need to take place during breeding season (February 15 through August 31), a pre-construction avian survey(s) will be required. The last	LTS

Table ES-1 Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		survey should be conducted a minimum of three days prior to the start of work. The District shall hire a qualified biologist to prepare the preconstruction avian survey. If any bird listed under the Migratory Bird Treaty Act is found to be nesting within the project site or within the area of vegetation or ground disturbing activities, a qualified biologist shall reach out to USFWS and CDFW immediately, any permitting requirements shall be adhered to, and an adequate protective buffer zone shall be established by a qualified biologist to protect the nesting site. The distance shall be determined by a qualified biologist based on the site conditions (e.g., topography, if the nest is in a line of sight of the construction, and the sensitivity of the birds nesting). Additional protective measures shall include establishment of clearly delineated exclusion zones (i.e., demarcated by identifiable fencing, such as orange construction fencing or equivalent) around each nest location as determined by a qualified biologist, taking into account the species of birds nesting, their tolerance for disturbance, and proximity to existing development. The nest site(s) shall be monitored by a qualified biologist periodically to see if the birds are stressed by the construction activities and if the protective buffer needs to be increased. Once the young have fledged and are flying well enough to avoid project construction	

Table ES-1 Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		zones (Typically by August), the project can proceed without further regard to the nest site(s). If an individual is observed perching but not nesting, work within a 500-foot buffer shall temporarily be put on hold and the individual will be allowed to leave on its own accord.	
Impact BIO-b): The proposed project would not result in the loss of any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.	LTS	No mitigation measures are required.	LTS
Impact BIO-c): The proposed project would not have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.	LTS	No mitigation measures are required.	LTS
Impact BIO-d): The proposed project could potentially interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.	PS	Mitigation Measure BIO-1: Preconstruction Avian Survey. To the extent feasible, in order to minimize potential impacts to avian species, vegetation clearing or ground-disturbing activities should be conducted during the non-breeding season (September 1 to February 14) to limit impacts to nesting birds. If vegetation clearing or ground-disturbing activities need to take place during breeding	LTS

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Table ES-1 Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		season (February 15 through August 31), a pre-construction avian survey(s) will be required. The last survey should be conducted a minimum of three days prior to the start of work. The District shall hire a qualified biologist to prepare the preconstruction avian survey. If any bird listed under the Migratory Bird Treaty Act is found to be nesting within the project site or within the area of vegetation or ground disturbing activities, a qualified biologist shall reach out to USFWS and CDFW immediately, any permitting requirements shall be adhered to, and an adequate protective buffer zone shall be established by a qualified biologist to protect the nesting site. The distance shall be determined by a qualified biologist based on the site conditions (e.g., topography, if the nest is in a line of sight of the construction, and the sensitivity of the birds nesting). Additional protective measures shall include establishment of clearly delineated exclusion zones (i.e., demarcated by identifiable fencing, such as orange construction fencing or equivalent) around each nest location as determined by a qualified biologist, taking into account the species of birds nesting, their tolerance for disturbance, and proximity to existing development. The nest site(s) shall be monitored by a qualified biologist periodically to see if the birds are stressed by the construction activities and if the protective buffer needs to be increased. Once the young have fledged and are flying well enough to avoid project construction	

Table ES-1 Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		zones (Typically by August), the project can proceed without further regard to the nest site(s). If an individual is observed perching but not nesting, work within a 500-foot buffer shall temporarily be put on hold and the individual will be allowed to leave on its own accord.	
Impact BIO-e): The proposed project could potentially conflict with local policies or ordinances protecting biological resources, but would not conflict with the provisions of an adopted habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.	LTS	No mitigation measures are required.	LTS
Impact BIO-f): The proposed project would conflict with the provisions of an adopted Habitat Conservation Plan; Natural Community Conservation Plan; or other approved local, regional, or state habitat conservation plan?	NI	No mitigation measures are required.	NI
CULTURAL RESOURCES			
Impact CUL-a): The proposed project would not cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5.	LTS	No mitigation measures are required.	LTS

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Table ES-1 Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
Impact CUL-b): The proposed project could cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5.	PS	Mitigation Measure CUL-1: If cultural resources are encountered during ground-disturbing activities, work in the immediate area shall cease, and an archaeologist meeting the Secretary of the Interior’s Professional Qualifications Standards for archaeology (NPS 1983) shall be contacted immediately to evaluate the find(s), and an on-site archaeologist monitor shall oversee the remaining earthmoving activities. If the discovery proves to be significant under California Environmental Quality Act, additional work such as data recovery excavation may be warranted and will be reported to the Paradise Unified School District.	LTS
Impact CUL-c): The proposed project could disturb any human remains, including those interred outside of dedicated cemeteries.	LTS	No mitigation measures are required.	LTS
ENERGY			
Impact ENG-a): The proposed project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	LTS	No mitigation measures are required.	LTS
Impact ENG-b): The proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	LTS	No mitigation measures are required.	LTS

Table ES-1 Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
GEOLOGY AND SOILS			
Impact GEO-a): The proposed project would not subject residents [or occupants, visitors, etc.] to potential seismic-related hazards, including the risk of loss, injury, or death involving: Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. (Refer to Division of Mines and Geology Special Publication 42.) Strong seismic ground shaking. Seismic-related ground failure, including liquefaction. Landslides.	LTS	No mitigation measures are required.	LTS
Impact GEO-b): The proposed project would not result in substantial soil erosion or the loss of topsoil.	LTS	No mitigation measures are required.	LTS
Impact GEO-c): The proposed project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.	LTS	No mitigation measures are required.	LTS
Impact GEO-d): The proposed project would not be located on expansive soil, as defined in Table 18-1B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.	LTS	No mitigation measures are required.	LTS

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Table ES-1 Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
Impact GEO-e): The proposed project would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.	LTS	No mitigation measures are required.	LTS
Impact GEO-f): The proposed project may indirectly destroy a unique paleontological resource.	PS	Mitigation Measure GEO-1: In the event that fossils or fossil locality deposits are discovered during construction, excavations within 50 feet of the fossil locality shall be temporarily halted until removal of the fossil localities. The contractor shall notify a qualified paleontologist to investigate its significance. If the fossil locality is determined to be significant by the qualified paleontologist, the paleontologist shall work with the District to follow accepted professional standards such as further testing for evaluation or data recovery, as necessary. The paleontologist shall notify the appropriate agencies to determine procedures that would be followed before construction. Paleontological resources or fossils are remains of ancient plants and animals that can provide scientifically significant information about the history of life on earth. This sensitivity is determined by rock type, history of the geologic unit in producing significant fossils, and fossil localities that are recorded from that unit. Though paleontological resources are not expected to be discovered during project construction, it is possible that unknown paleontological resources could be discovered during grading activities and utility trenching for a proper base and slope for the proposed project. Implementation	LTS

Table ES-1 Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		of Mitigation Measure GEO-1 would ensure that impacts to unknown paleontological resources are less than significant. is allowed to resume at the location of the find. If the project proponent determines that avoidance is not feasible, the paleontologist shall prepare an excavation plan for mitigating the effect of the project based on the qualities that make the resource important.	
GREENHOUSE GAS EMISSIONS			
Impact GHG-a): The proposed project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	PS	Mitigation Measure GHG-1: The proposed project shall comply with the applicable 2025 California Green Building Standards Code (CALGreen) Tier 2 standards. Plans shall identify the number of electric vehicle (EV) parking spaces with chargers that meet the 2025 CALGreen Tier 2 standards. If the 2025 CALGreen Tier 2 standards cannot be fully implemented at the project site, the applicant shall calculate the reduction in GHG emissions resulting from the vehicle fuel switching opportunity of hybrid-electric vehicles that could charge on-site with a charging supply meeting the applicable CALGreen Tier 2 standards and identify alternative measures to implement on-site to achieve the same GHG emission reduction performance. Quantification of the reduction in GHG emissions resulting from the vehicle fuel switching opportunity of hybrid-electric vehicles that could charge on-site with a charging supply meeting the applicable CALGreen Tier 2 standards	LTS

EXECUTIVE SUMMARY

Table ES-1 Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		shall be in accordance with the California Air Pollution Control Officers Association's <i>Handbook for Analyzing Greenhouse Gas Emissions Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity</i>, Chapter 3, Measures to Reduce GHG Emissions: Transportation, Section T-14, Provide Electric Vehicle Charging Infrastructure. Alternative measures implemented by the District shall be quantified for GHG emission reductions for comparison against those identified for installing electric vehicle charging compliance with the applicable Tier 2 CALGreen standards to ensure that any combination of alternative measures implemented would reduce annual GHG emissions no less than those achieved by meeting Tier 2 CALGreen standards. Alternative measures implemented may include any combination of the following: ■ Installation of Renewable Generation Technology. Prior to the issuance of occupancy, the project developer shall install renewable energy systems, such as solar or wind generation technologies. The project developer shall provide documentation to the District detailing the annual generation output of new on-site photovoltaic (e.g., solar) or other renewable generation technology (e.g., wind) beyond what would be required for project compliance with Title 24, Part 6. Quantification of the annual generation output of renewable generation technologies implemented as	

Table ES-1 Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		part of the proposed project shall utilize California Energy Commission (CEC)-approved energy modeling software or CEC-approved calculation methodology. ■ Building Energy Efficiency and Performance Improvements. Prior to the issuance of building permits, the project developer shall provide documentation to the District detailing the building's energy efficiency performance beyond what would be required for project compliance with Title 24, Part 6. Documentation provided to the District to support implementation of this measure shall include at a minimum a completed Nonresidential Certificate of Compliance (NRCC) form and documented quantification of energy consumption reduction. Quantification of the reduced annual natural gas and electricity consumption resulting from building design improvements beyond that required for compliance with Title 24, Part 6 shall utilize CEC-approved energy modeling software. Annual energy consumption reduction resulting from building design improvements beyond that required under Title 24 shall be converted to MTCO₂e per year using the latest EPA-recommended conversion factors for natural gas and the latest carbon intensity factor for Pacific Gas & Electric (PG&E). ■ Low or Zero Global Warming Potential Refrigerants. Prior to the issuance of occupancy, the District shall utilize low or zero global warming potential (GWP)	

EXECUTIVE SUMMARY

Table ES-1 Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		refrigerant products in place of traditional refrigerant products used on the campus. Annual GHG emission reductions from using low or zero GWP refrigerant products shall be quantified using the latest California Air Resources Board- (CARB) approved methodology. ■ Carbon-Free Electricity. Prior to the issuance of the certificate of occupancy, the District shall enroll in an available electricity service for carbon-free electricity. The District may enroll in Pacific Gas & Electric’s (PG&E) “100% Solar Choice” or “Regional Renewable Choice” programs, or another equivalent electricity service which delivers power generated from renewable and/or carbon-free sources. Annual electricity consumption that utilizes renewable or carbon-free services shall be quantified using CEC-approved energy modeling software or CEC-approved calculation methodology and converted to MTCO₂e using Pacific Gas & Electric’s alternative electricity service’s latest carbon intensity factor.	
Impact GHG-b): The proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	LTS	No mitigation measures are required.	LTS

Table ES-1 Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
HAZARDS AND HAZARDOUS MATERIALS			
Impact HAZ-a): The proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	LTS	No mitigation measures are required.	LTS
Impact HAZ-b): The proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.	PS	Mitigation Measure HAZ-1: Upon completion of a PEA (soil sampling), the report shall be submitted to the California Department of Toxic Substances Control (DTSC) for review and approval of the report's conclusions and recommendations. If the report concludes that potential contaminants of concern have not been identified at or above the regulatory screening levels, then the report shall recommend that DTSC provide the District with a "No Further Action" letter of determination for the project site. If the report concludes that contaminants of concern have been identified above regulatory screening levels, then the report shall recommend further assessment. Depending on the extent of soil contamination identified, a remediation plan may be required to protect human health and the environment. The District shall enter into an environmental oversight agreement with DTSC to ensure that all applicable local, state, or federal regulations are followed during the remediation process. The remedial actions shall be implemented and completed before construction is completed and prior to occupancy.	LTS

EXECUTIVE SUMMARY

Table ES-1 Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
Impact HAZ-c): The proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substance, or waste within one quarter mile of an existing or proposed school.	LTS	No mitigation measures are required.	LTS
Impact HAZ-d): The proposed project would not be located on a site that is included on a list of hazardous materials compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.	LTS	No mitigation measures are required.	LTS
Impact HAZ-e): The proposed project would not be within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would result in a safety hazard or excessive noise for people residing or working in the project area.	NI	No mitigation measures are required.	NI
Impact HAZ-f): The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	LTS	No mitigation measures are required.	LTS
Impact HAZ-g): The proposed project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.	LTS	No mitigation measures are required.	LTS

Table ES-1 Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
HYDROLOGY AND WATER QUALITY			
Impact HYDRO-a): The proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.	LTS	No mitigation measures are required.	LTS
Impact HYDRO-b): The proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.	LTS	No mitigation measures are required.	LTS
Impact HYDRO-c): The proposed project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: Result in substantial erosion or siltation on- or off-site. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impede or redirect flood flows.	LTS	No mitigation measures are required.	LTS

EXECUTIVE SUMMARY

Table ES-1 Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
Impact HYDRO-d): The proposed project would not risk release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones.	LTS	No mitigation measures are required.	LTS
Impact HYDRO-e): The proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	LTS	No mitigation measures are required.	LTS
LAND USE AND PLANNING			
Impact LUP-a): The proposed project would not physically divide an established community.	NI	No mitigation measures are required.	NI
Impact LUP-b): The proposed project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.	NI	No mitigation measures are required.	NI
Mineral Resources			
Impact MIN-a): The proposed project would not result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state.	NI	No mitigation measures are required.	NI
Impact MIN-b): The proposed project would not result in the loss of availability of a locally important mineral resource recovery site	NI	No mitigation measures are required.	NI

Table ES-1 Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
delineated on a local general plan, specific plan or other land use plan.			
NOISE			
Impact NOI-a): The proposed project would not generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	PS	Mitigation Measure NOI-1: The Paradise Unified School District (PUSD or District) construction contract bid shall be required to include, but not be limited to, the following noise-reduction measures: - Construction activity is limited to Mondays through Saturdays between the hours of 6:00 am and 7:00 pm, and at no time on Sundays or holidays, as prescribed in the Code of Ordinances Section 9.18.160. - During the entire active construction period, equipment and trucks used for project construction shall use the best-available noise control techniques wherever feasible (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds). - Impact tools (e.g., jack hammers and hoe rams) shall be hydraulically or electrically powered wherever possible. Where the use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used along with external noise jackets on the tools.	LTS

EXECUTIVE SUMMARY

Table ES-1 Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
		- Stationary equipment, such as generators and air compressors, shall be located as far as feasible from adjacent noise-sensitive uses. - Install localized noise barriers for stationary equipment when located within 50 feet of adjacent noise-sensitive property lines. - Stockpiling shall be located as far as feasible from nearby noise-sensitive receptors. - At least 10 days prior to the start of construction activities, a sign shall be posted at the entrance(s) to the job site, clearly visible to the public, that includes permitted construction days and hours as well as the telephone numbers of the District's and contractor's authorized representatives that are assigned to respond in the event of a noise or vibration complaint. If the authorized contractor's representative receives a complaint, he/she shall investigate, take appropriate corrective action, and report the action to the District.	
Impact NOI-b): The proposed project would not generate excessive groundborne vibration or groundborne noise levels.	LTS	No mitigation measures are required.	LTS
Impact NOI-c): The proposed project is not within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, if the project would expose	NI	No mitigation measures are required.	NI

EXECUTIVE SUMMARY

Table ES-1 Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
people residing or working in the project area to excessive noise levels.			
POPULATION AND HOUSING			
Impact PH-a): The proposed project would not induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).	NI	No mitigation measures are required.	NI
Impact PH-b): The proposed project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.	NI	No mitigation measures are required.	NI
PUBLIC SERVICES			
Impact PS-a): The proposed project would not result in a substantial adverse physical impact associated with the provisions of new or physically altered fire protection facilities.	LTS	No mitigation measures are required.	LTS
Impact PS-b): The proposed project would not result in a substantial adverse physical impact associated with the provisions of new or physically altered police protection facilities.	LTS	No mitigation measures are required.	LTS

EXECUTIVE SUMMARY

Table ES-1 Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
Impact PS-c): The proposed project would not result in a substantial adverse physical impact associated with the provisions of new or physically altered public school facilities.	NI	No mitigation measures are required.	NI
Impact PS-d): The proposed project would not result in a substantial adverse physical impact associated with the provisions of new or physically altered park facilities.	NI	No mitigation measures are required.	NI
Impact PS-e): The proposed project would not result in a substantial adverse physical impact associated with the provisions of new or physically altered public service facilities.	NI	No mitigation measures are required.	NI
RECREATION			
Impact REC-a): The proposed project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.	NI	No mitigation measures are required.	NI
Impact REC-b): The proposed project does not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.	NI	No mitigation measures are required.	NI

Table ES-1 Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
TRANSPORTATION			
Impact TRANS-a): The proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, and pedestrian facilities.	LTS	No mitigation measures are required.	LTS
Impact TRANS-b): The proposed project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3 (b).	LTS	No mitigation measures are required.	LTS
Impact TRANS-c): The proposed project would not substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	LTS	No mitigation measures are required.	LTS
Impact TRANS-d): The proposed project would not result in inadequate emergency access	LTS	No mitigation measures are required.	LTS
TRIBAL CULTURAL RESOURCES			
Impact TCR-a-i): The proposed project could cause a substantial adverse change in the significance of a tribal cultural resource listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources, as defined in Public Resources Code Section 5020.1(k).	LTS	No mitigation measures are required.	LTS
Impact TCR-a-ii): The proposed project could cause a substantial adverse change in the significance of a tribal cultural resource determined by the lead	LTS	No mitigation measures are required.	LTS

EXECUTIVE SUMMARY

Table ES-1 Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1.			
UTILITIES AND SERVICE SYSTEMS			
Impact USS-a): The proposed project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.	LTS	No mitigation measures are required.	LTS
Impact USS-b): The proposed project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.	LTS	No mitigation measures are required.	LTS
Impact USS-c): The proposed project would result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.	LTS	No mitigation measures are required.	LTS

Table ES-1 Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
Impact USS-d): The proposed project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.	LTS	No mitigation measures are required.	LTS
Impact USS-e): The proposed project would comply with federal, state, and local statutes and regulations related to solid waste.	LTS	No mitigation measures are required.	LTS
WILDFIRE			
Impact W-a): Buildout of the proposed project would not substantially impair an adopted emergency response plan or emergency evacuation plan.	LTS	No mitigation measures are required.	LTS
Impact W-b): The proposed project would not exacerbate wildfire risks due to slope, prevailing winds, and other factors, thereby exposing project occupants to elevated particulate concentrations from a wildfire.	LTS	No mitigation measures are required.	LTS
Impact W-c): The proposed project would not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.	LTS	No mitigation measures are required.	LTS

Table ES-1 Summary of Environmental Impacts and Mitigation Measures

Environmental Impact	Level of Significance without Mitigation	Mitigation Measures	Level of Significance with Mitigation
Impact W-d): The proposed project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.	LTS	No mitigation measures are required.	LTS

1. INTRODUCTION

1.1 PURPOSE OF THE EIR

The California Environmental Quality Act (CEQA) requires that all state and local governmental agencies consider the environmental consequences of projects over which they have discretionary authority before taking action on those projects. This Draft Environmental Impact Report (DEIR) has been prepared to satisfy CEQA and the CEQA Guidelines. The environmental impact report (EIR) is the public document designed to provide decision makers and the public with an analysis of the environmental effects of the proposed project, to indicate possible ways to reduce or avoid environmental damage and to identify alternatives to the project. The EIR must also disclose significant environmental impacts that cannot be avoided; growth inducing impacts; effects not found to be significant; and significant cumulative impacts of all past, present, and reasonably foreseeable future projects.

The lead agency means “the public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment” (CEQA Section 21067). The Paradise Unified School District (PUSD or District) has the principal responsibility for approval of the Paradise High School Expansion Project (proposed project). For this reason, the District is the CEQA lead agency for this project. The District will review and consider this EIR in its decision to approve, revise, or deny the project.

The intent of the DEIR is to provide sufficient information on the potential environmental impacts of the proposed project to allow the District to make an informed decision regarding approval of the project. Specific discretionary actions to be reviewed by the District are described in Section 2.6, *Intended Uses of the EIR*.

This DEIR has been prepared in accordance with requirements of the:

- California Environmental Quality Act (CEQA) of 1970, as amended (Public Resources Code, Sections 21000 et seq.)
- State Guidelines for the Implementation of the CEQA of 1970 (CEQA Guidelines), as amended (California Code of Regulations, Sections 15000 et seq.)

The overall purpose of this DEIR is to inform the lead agency, responsible agencies, decision makers, and the general public about the environmental effects of the development and operation of the proposed project. This DEIR addresses effects that may be significant and

1. INTRODUCTION

adverse; evaluates alternatives to the project; and identifies mitigation measures to reduce or avoid adverse effects.

1.2 ENVIRONMENTAL REVIEW PROCESS

1.2.1 Notice of Preparation

The District determined that an EIR would be required for this project and issued a Notice of Preparation (NOP) on March 13, 2026, for a 30-day public review period from March 13, 2026, to April 13, 2026 (see Appendix A). They were distributed to federal, state, tribal, regional, local government, utility agencies, and other interested parties to solicit comments and inform the public of the potential environmental issues that the EIR would address. Comments received during the NOP public review period are provided in Appendix A.

The NOP process helps determine the scope of the environmental issues to be addressed in the DEIR. Based on this process, certain environmental categories were identified as having the potential to result in significant impacts. Issues considered Potentially Significant are addressed in this DEIR, and issues identified to result in no impacts or less than significant impacts are addressed in Chapter 5, *Other CEQA Considerations*, of this DEIR.

1.2.2 Draft EIR

The scope of the DEIR was determined based on the NOP. Pursuant to Sections 15126.2 and 15126.4 of the CEQA Guidelines, the DEIR should identify any potentially significant adverse impacts and recommend mitigation that would reduce or eliminate these impacts to levels of insignificance. The information in Chapter 2, *Project Description*, establishes the basis for analyzing future, project-related environmental impacts.

IMPACTS CONSIDERED LESS THAN SIGNIFICANT

The District determined that five environmental impact categories were not significantly affected by or did not affect the proposed project. These categories are not discussed in detail in this DEIR.

- Energy
- Land Use and Planning
- Mineral Resources
- Population and Housing
- Recreation

POTENTIALLY SIGNIFICANT ADVERSE IMPACTS

The District determined that 15 environmental factors have potentially significant impacts if the proposed project is implemented. These categories are discussed in detail in this DEIR.

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Noise
- Public Services
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

UNAVOIDABLE SIGNIFICANT ADVERSE IMPACTS

Unavoidable adverse impacts may be considered significant on a project-specific basis, cumulatively significant, and/or potentially significant. However, this DEIR did not identify any significant and unavoidable adverse impacts, as defined by CEQA, that would result from implementation of the proposed project.

1.2.3 Final EIR Certification

This DEIR is being circulated for public review for 45 days, from July 29, 2026, to September 11, 2026. Interested agencies and members of the public are invited to provide written comments on the DEIR to the District address shown on the title page of this document. Upon completion of the 45-day review period, the District will review all written comments received and prepare written responses for each. A Final EIR (FEIR) will incorporate the received comments, responses to the comments, and any changes to the DEIR that result from comments. The FEIR will be presented to the PUSD Board of Trustees for potential certification as the environmental document for the project. All persons who comment on the DEIR will be notified of the availability of the FEIR and the date of the public hearing before the PUSD Board of Trustees.

1. INTRODUCTION

The DEIR is available to the general public for review at the following locations:

- Paradise Unified School District, 6696 Clark Road, Paradise, CA 95969
- Paradise High School, 5911 Maxwell Drive, Paradise, CA 95969
- Paradise Unified School District website: <https://www.pusdk12.org/Departments/District-Services/Maintenance--Operations/index.html>

1.3 MITIGATION MONITORING

Public Resources Code Section 21081.6 requires that agencies adopt a Mitigation Monitoring and Reporting Program (MMRP) for any project for which it has made findings pursuant to Public Resources Code Section 21081 or adopted a Negative Declaration pursuant to Section 21080(c). Such a program is intended to ensure the implementation of all mitigation measures adopted through the preparation of an EIR or Negative Declaration.

The MMRP for the proposed project will be completed as part of the FEIR, prior to consideration of the project by the PUSD School Board of Trustees.

1.4 INCORPORATION BY REFERENCE

Some documents are incorporated by reference into this DEIR, consistent with Section 15150 of the CEQA Guidelines.

- Town of Paradise Municipal Code
- Town of Paradise General Plan

2. PROJECT DESCRIPTION

2.1 INTRODUCTION

This chapter provides a detailed description of the proposed improvements at the Paradise High School campus (Paradise HS or campus) for the benefit of the public, reviewing agencies, and decision-makers. The proposed project consists of three primary components: the construction of a new parking lot, the development of a modern agricultural building, and the installation of a new multi-use sports field. Pursuant to the California Environmental Quality Act (CEQA) and the CEQA Guidelines (CEQA Guidelines, Section 15124), an environmental impact report (EIR) should contain a description of the proposed project that includes:

- (a) The precise location and boundaries of the proposed project;
- (b) A statement of the objectives sought by the proposed project, including the underlying purpose of the project;
- (c) A general description of the proposed project's technical, economic, and environmental characteristics; and
- (d) A statement briefly describing the intended uses of the EIR, including a list of the agencies that are expected to use the EIR in their decision making, a list of permits and other approvals required to implement the proposed project, and a list of related environmental review and consultation requirements required by federal, state, or local laws, regulations, or policies.

This Draft Environmental Impact Report (DEIR) has been completed in accordance with CEQA, which requires that State and local public agencies analyze proposed projects to determine potential impacts on the environment and disclose any such impacts. The Paradise Unified School District (PUSD or District) is the lead agency for the environmental review of the proposed project.

An adequate project description should not supply extensive detail beyond that needed for evaluation and review of environmental impacts. Accordingly, this chapter describes the necessary details of the proposed project that are critical in assessing the direct, indirect, long-term, and temporary impacts associated with project implementation. This chapter provides a detailed description of the proposed project, including the location, setting, and characteristics

2. PROJECT DESCRIPTION

of the project site as well as the project objectives, the principal project components, and required permits and approvals.

2.2 PROJECT LOCATION

The Paradise HS campus is at 5911 Maxwell Drive, in the Town of Paradise, Butte County (see Figure 2-1, *Regional Location*). The project site is near the southern boundary of the Paradise HS campus, and includes five Assessor's Parcel Numbers (APN), as shown in Table 2-1, *Project Site Parcels* (project site). The project site is approximately 6 miles west of State Route (SR) 70, approximately 6.6 miles east of SR-32, and approximately 9.5 miles north of SR-99 (see Figure 2-2, *Local Vicinity*, and Figure 2-3, *Aerial Photograph*).

Table 2-1 Project Site Parcels

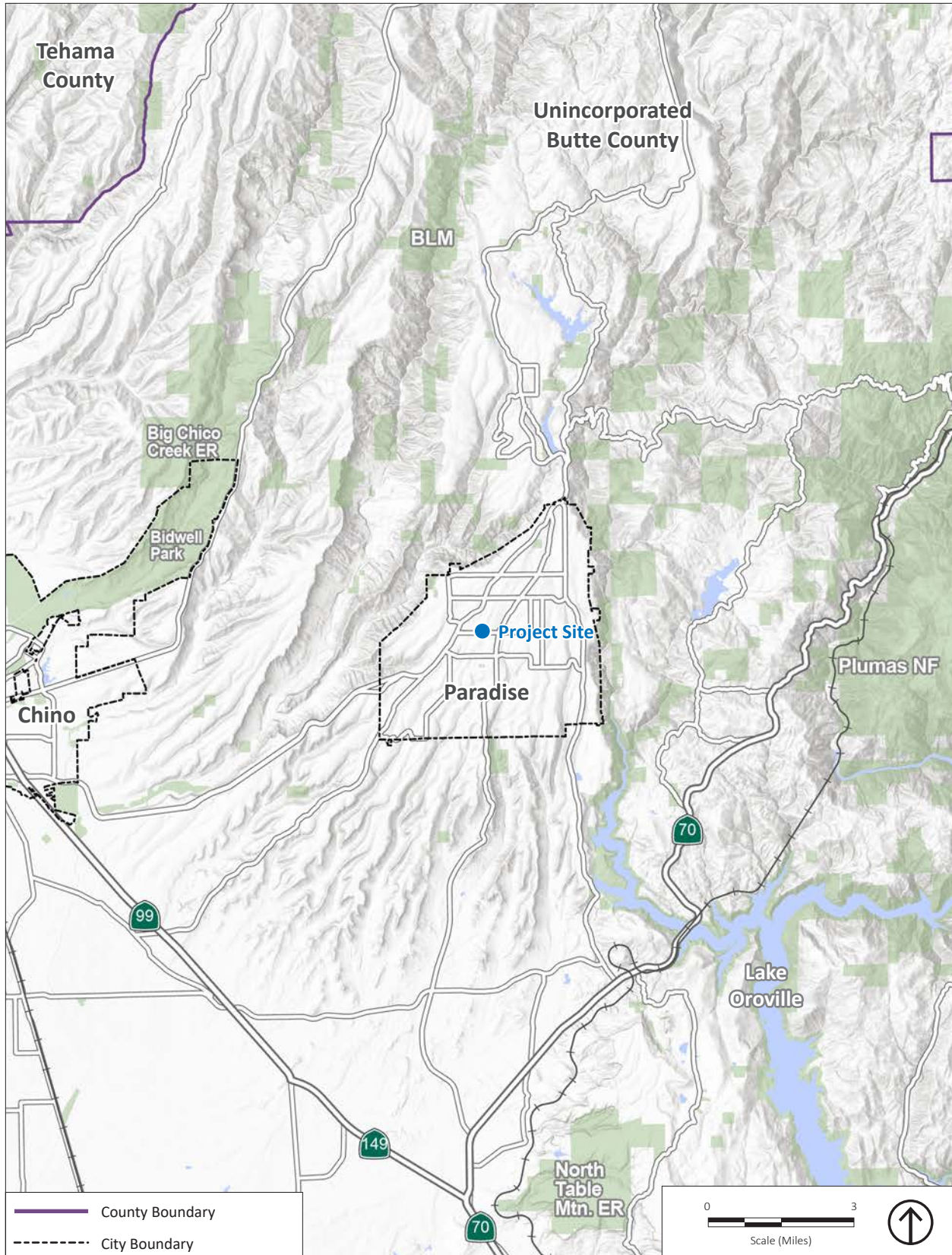
Assessor's Parcel Numbers	Address	Zoning Designation
053-111-015	897 Elliott Rd	TR 1/2
053-111-014	901 Elliott Rd	TR 1/2
053-111-028	915 Elliott Rd	TR 1/2
053-111-030	No Address Available	CS
053-111-034	935 Elliott Rd	CS

2.2.1 Regional Setting

The Town of Paradise is in eastern Butte County in Northern California, in the foothills of the Sierra Nevada approximately 10 miles east of the City of Chico. Regionally, the Town of Paradise is part of the northern Sacramento Valley–Sierra Nevada transition zone, characterized by a mix of forested uplands, rural residential development, and interspersed open space. The Town is primarily accessed via State Route 191 (Skyway), which connects Paradise to Chico and the broader regional transportation network as well as Neal Road to the southwest. Surrounding land uses include other foothill communities, managed timberlands, and natural resource areas, placing Paradise within a largely wildland-urban interface that is regionally significant for wildfire risk, watershed protection, and recreation (see Figure 2-1).

2.2.2 Local Setting

The project site is bounded by Maxwell Drive to the east, Elliot Road to the south, the Paradise HS campus to the north, and a residential property to the west.



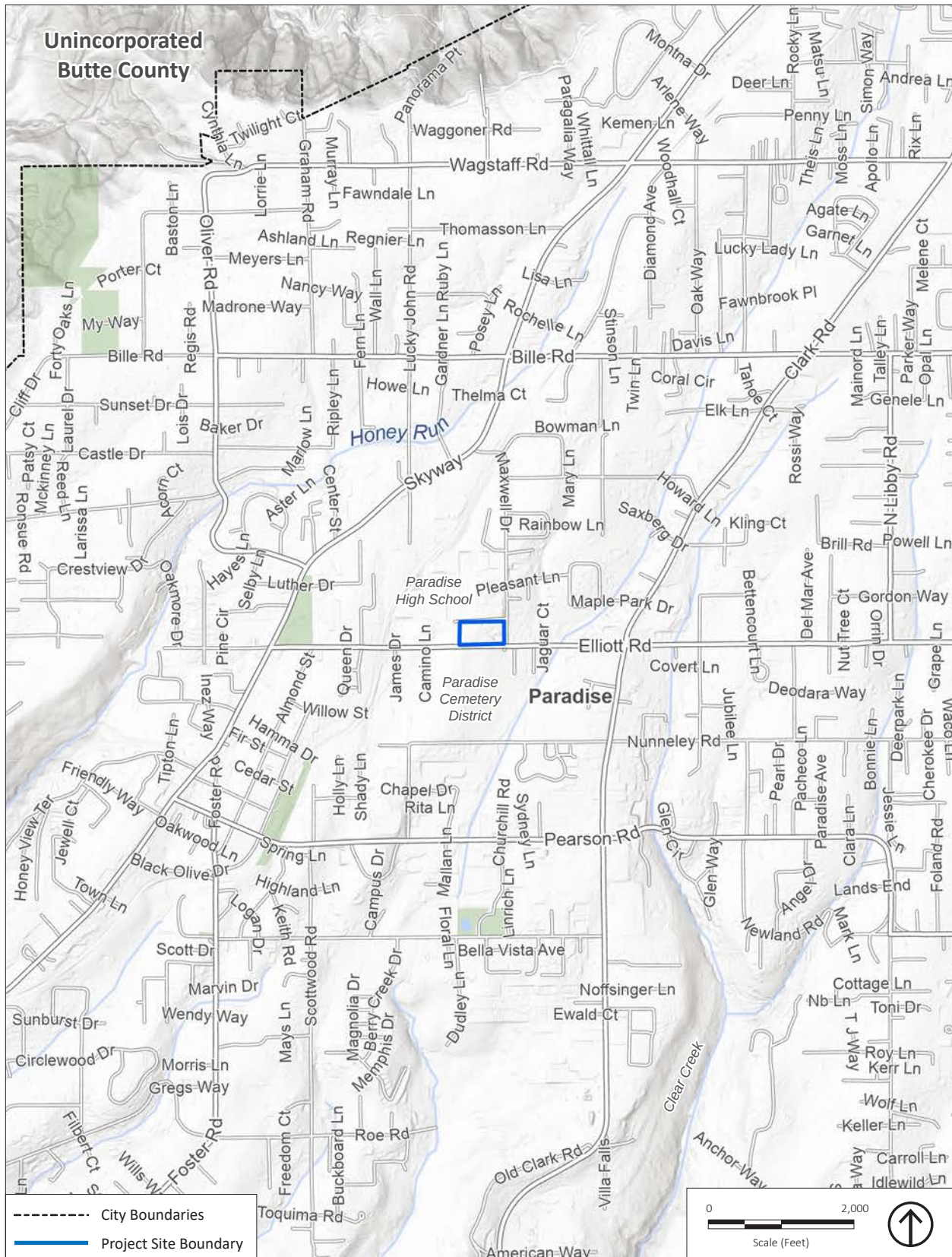
Source: Generated using GIS Pro 2025.

Figure 2-1
Regional Location

2. PROJECT DESCRIPTION

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PARADISE HIGH SCHOOL EXPANSION PROJECT DRAFT EIR
PARADISE UNIFIED SCHOOL DISTRICT



Source: Generated using GIS Pro 2025.

Figure 2-2
Local Vicinity

2. PROJECT DESCRIPTION

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PARADISE HIGH SCHOOL EXPANSION PROJECT DRAFT EIR
PARADISE UNIFIED SCHOOL DISTRICT



Source: Nearmap 2025.

Figure 2-3
Aerial Photograph

2. PROJECT DESCRIPTION

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2. PROJECT DESCRIPTION

2.2.3 Existing General Plan Land Use and Zoning

The project site consists of five parcels, three of which are zoned TR 1/2 and two of which are zoned CS. The three parcels zoned TR 1/ 2 have a land use designation of Town Residential (TR). Both TR and TR 1/ 2 are intended for land areas that are planned for existing single-family residential areas characterized by small-sized parcels. Animal production/livestock is permitted in a TR-1/2 zone upon town approval and issuance of an administrative permit. However, the District is exempt from local zoning and does not require an administrative permit.

The two parcels zoned CS also have a land use designation of Community Services (CS), which is intended for land areas that are planned to or already provide for public and public institutional land uses or private land uses that serve a community purpose or benefit the community.

2.2.4 Surrounding Land Use

The surrounding land uses near the project site consist of Paradise HS to the north and established residential neighborhoods characterized by single-family homes. The Paradise HS campus has a General Plan designation of Public Institutional, which accommodates educational facilities and other community services provided by public agencies. The campus is zoned Community-Facilities (C-F), which allow public, institutional, and community benefit uses consistent with schools and similar civic facilities. In addition to residential uses, the area includes public and institutional land uses, such as other educational facilities, recreational fields, and community service facilities. Commercial uses are limited and generally farther along major corridors such as Clark Road.

2.3 ENVIRONMENTAL SETTING

2.3.1 Existing Conditions

The project site is currently vacant and previously contained the First Assembly of God Church with associated parking lot and multiple residential structures, which burned down during the 2018 Camp Fire (see Figure 2-3). The project site and surrounding area are nearly flat, with a slight slope from east to west. The hardscape parking lot remains on the eastern portion of the project site. Storage containers exist in the center portion of the project site. The remaining area on the west side is vacant of any structures.

2.3.2 Paradise High School

The existing school serves students from grades 9 through 12. The existing school, which was founded in 1954, currently contains several classrooms building, administration buildings,

2. PROJECT DESCRIPTION

auditorium, and four surface parking lots. Additionally, the Paradise HS campus contains athletic facilities, including a football field, baseball and softball fields, hardtop basketball courts, tennis courts, and a gymnasium. As shown in Table 2-2, *Paradise High School 2024-2025 Enrollment*, during the 2024-2025 school year, the school had a student population of approximately 495 students (CDE 2025).

Table 2-2 Paradise High School 2024-2025 Enrollment

School Year Enrollment	Grade 9	Grade 10	Grade 11	Grade 12	Total Enrollment
2024-2025	145	135	114	101	495

Source: CDE 2025.

2.3.3 Existing Athletic Facilities

Paradise HS includes one football stadium with a track and field, one baseball field, and one softball field on the western portion of the campus. The track consists of an all-weather surface that surrounds the natural grass football/soccer field, along with track and field equipment. The track-and-field also includes an equipment storage building and scoreboard in the northern portion of the track and field. The track and field are surrounded by bleachers on the east and west sides with capacity for 2,500 spectators. Additionally, Paradise HS includes a gymnasium and six tennis courts on the north portion of the campus.

2.3.4 Athletic/Events Schedule

Paradise HS hosts various sports events and other school events. The existing sports events include tackle football, flag football, girls and boys soccer, girls and boys lacrosse, and track and field. The track and field also hosts band events. Table 2-3, *Paradise High School Existing Athletics/Events Schedule*, shows the existing schedule for sports events and other school events.

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Table 2-3 Paradise High School Existing Athletics/Events Schedule

Activity/Use	Anticipated Number of Home Events	Days of Week	Times		Maximum Number of Attendees
			Start	End	
Tackle Football (August to November)					
Junior Varsity Football	5 per year	Friday	5:00 pm	7:00 pm	300
Varsity Football	5 per year	Friday	7:30 pm	9:30 pm	750
Band (August to November)					
Band Practice	30 per year	Wednesday or Thursday	7:00 am	8:30 am	100
Soccer (December to February)					
Girls Varsity Soccer	14 per year	Tuesday, Wednesday, Thursday, Friday, Saturday ¹	3:30 pm	5:30 pm	100
Boys Varsity Soccer	14 per year	Tuesday, Wednesday, Thursday, Friday, Saturday ¹	5:30 pm	7:30 pm	100
Track and Field (February to May)					
Cross Country	10 per year	Wednesday, Thursday, Friday, or Saturday	3:00 pm	6:00 pm	100
Graduation (June)					
Graduation	1 per year	TBD	6:00 pm	10:00 pm	500

Source: Paradise Unified School District, 2026.

1. Saturday events start at 7:00 a.m.

Lighting and Public Address System

The existing football stadium currently contains stadium lighting along the perimeter of the track and field, which are currently used for football games, and graduation. The project site does not currently contain any permanent lighting or a Public Address (PA) system.

2. PROJECT DESCRIPTION

2.3.5 Parking and Circulation

The center of the campus contains three parking lots. One parking lot in the northern portion of the campus, adjacent to the gymnasium, contains approximately 57 parking spaces, and one parking lot, at the center of the campus, contains approximately 23 parking spaces. Both parking lots are used for staff and visitor parking and are accessible via a private driveway from Maxwell Drive. Students have designated student parking around the gymnasium. One additional parking lot is at the south end of the campus and contains approximately 40 parking spaces. This parking lot is used for staff and visitor parking and is accessible by a separate private driveway from Maxwell Drive.

Additional driveway access to the campus is provided via Maxwell Drive, north of the Paradise HS administration building, with one ingress driveway and one egress driveway for student pick-up and drop-off.

2.4 STATEMENT OF PROJECT OBJECTIVES

Section 15124(b) of CEQA Guidelines requires a project description to state the objectives of a project that address its underlying purpose. The following specific objectives have been identified for the proposed project:

1. Provide adequate parking to support existing and planned on-site uses.
2. Develop a new agricultural building and livestock area to support instruction, training, and hands-on learning related to agricultural operations.
3. Provide adequate athletic facilities at Paradise HS to accommodate school sports games and practices at the campus.
4. Utilize existing space to enhance opportunities for after-school athletic and extracurricular activities.

2.5 PROJECT CHARACTERISTICS

“Project,” as defined by the CEQA Guidelines, means:

... the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and that is any of the following: (1) ... enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements thereof pursuant to Government Code Sections 65100–65700. (14 Cal. Code of Reg. Section 15378[a])

2. PROJECT DESCRIPTION

2.5.1 Description of the Proposed Project

The proposed project would be developed on a 7.31-acre project site and would consist of three components—one new parking lot, one new agricultural building, and a new football stadium and practice sports field (see Figure 2-4, *Project Site Plan*). The proposed project would utilize two parcels for the new parking lot, two parcels for the new football stadium that will also be used as practice fields, and one parcel for the new agricultural building (see Table 2-4, *Proposed Parcels Uses*). The proposed project would serve the existing Paradise HS students and staff, and student capacity on the campus would not increase as a result of the proposed project.

Table 2-4 Proposed Parcel Uses

Assessor's Parcel Numbers	Address	Proposed Use
053-111-015	897 Elliott Rd	Agricultural Building
053-111-014	901 Elliott Rd	Stadium Parking
053-111-028	915 Elliott Rd	Stadium Parking
053-111-030	No Address Available	Stadium/Practice Field
053-111-034	935 Elliott Rd	Stadium/Practice Field

2.5.2 Parking Lot

The new parking lot would make up approximately 1.97 acres (approximately 85,870 sf.) of the project site adjacent to the new stadium and practice fields. The proposed parking lot would provide approximately 121 parking spaces, including 114 standards parking spaces and 7 Americans with Disabilities Act (ADA) parking spaces. The parking lot would operate between the hours of 3:00 p.m. to 10:00 p.m. and would include a fence along the perimeter. Vehicular access to the parking lot would be provided via Elliot Road. An accessible pedestrian path of travel would be made available to connect to the new stadium and Paradise HS campus.

2.5.3 Agricultural Building

The agricultural building would be a 1,728-square-foot (sf) barn for the agricultural education program for Paradise HS students (see Figure 2-5, *Agricultural Building Site Plan*). The proposed agricultural building would include 7,728 sf of landscaping and concrete hardscape. The proposed building would include eight stalls for livestock and an accessible walkway 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 building would not require natural gas.

2. PROJECT DESCRIPTION

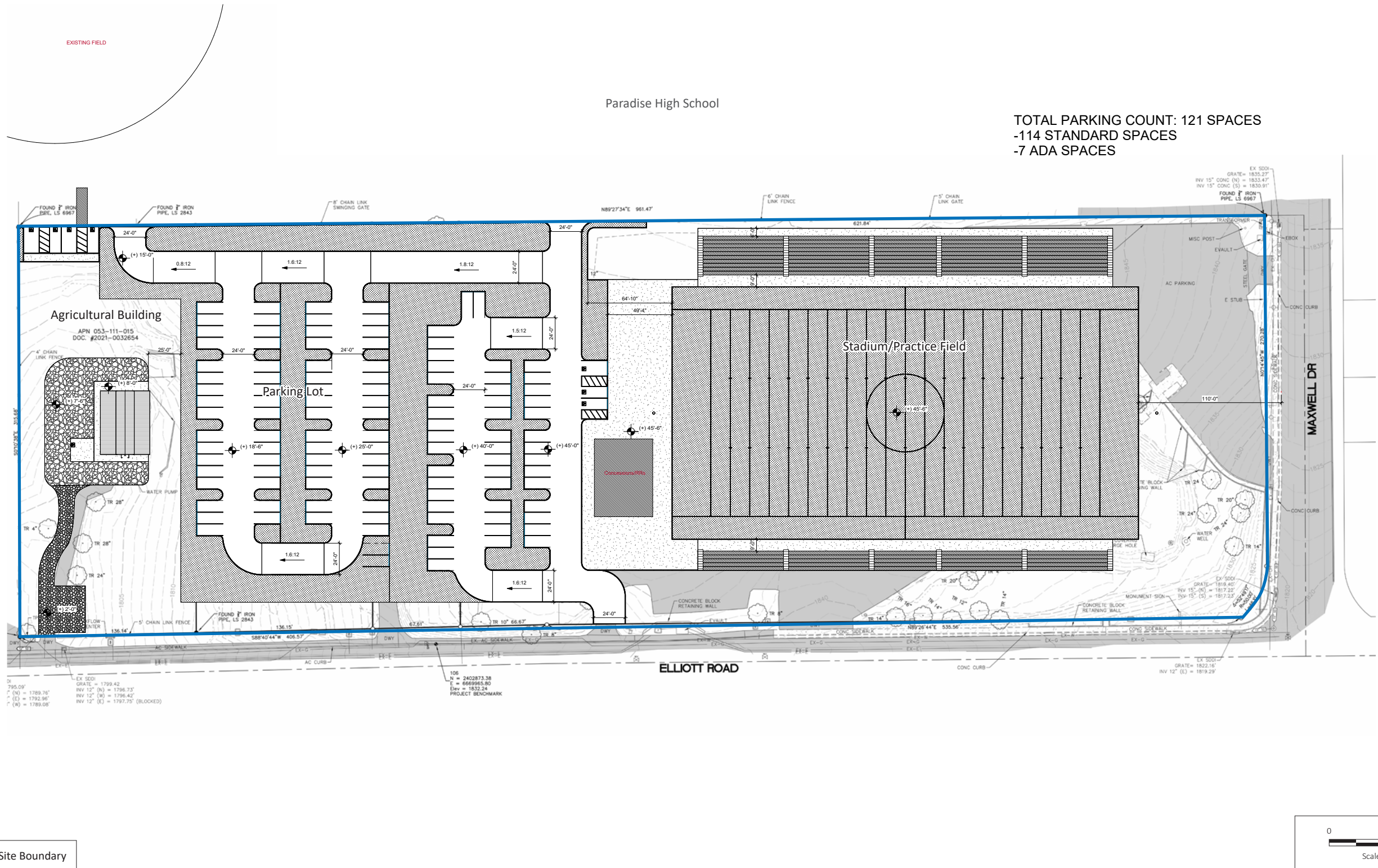
The proposed agricultural building is intended for the exclusive use of the Paradise HS agricultural program. The facility is designed to serve the existing student and staff population and will not result in an increase in student enrollment or overall campus capacity. Furthermore, the project does not involve changes to existing land uses, such as residential development, and will therefore not induce population growth or generate additional demand for school services or public infrastructure.

Operation of the proposed project would occur during school hours, which begin at 8:30 a.m. and conclude at 3:25 p.m. No more than nine students and one staff member would be at the agricultural building daily. Vehicular and pedestrian access to the project site would be provided via one driveway along Elliot Road. The driveway would be a gravel road that leads directly to the barn. A gravel parking lot would be located at the entrance and would contain four parking spaces. A fence would be built along the perimeter with two gates at the entrance of the driveway.

ODOR MANAGEMENT PLAN

As part of the Future Farmers of America (FFA) program, students would raise livestock, which would include pigs only; keep the pens clean; and ensure the health of the livestock. Students would engage with their livestock multiple times a day to ensure living conditions are kept clean and sanitary. The District would implement the following strategies to minimize any odors that would result from the operation of the agricultural building:

- Stalls would be regularly cleaned and layered with wood chips to absorb and contain odors.
- Wood chips and manure removed from the barn would be stored and composted for re-use around PUSD.
- Manure would be covered to contain the potential odors.
- Manure would be treated, if necessary, with natural amendments to adjust the pH levels.
- Animal feed would be adjusted to reduce nitrogen and sulfur compounds, which will minimize odor-causing compounds.
- Constant ventilation would be used inside of the barn to remove odors and stale air.
- Signs would be posted at the entry to the proposed facility and include the contacts for any comments or complaints from the community that will be responded to promptly.

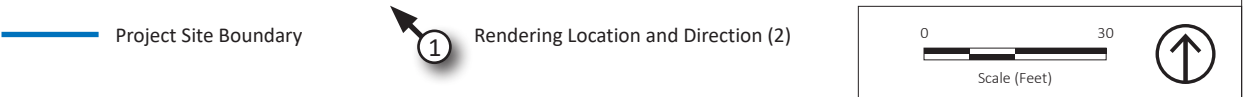
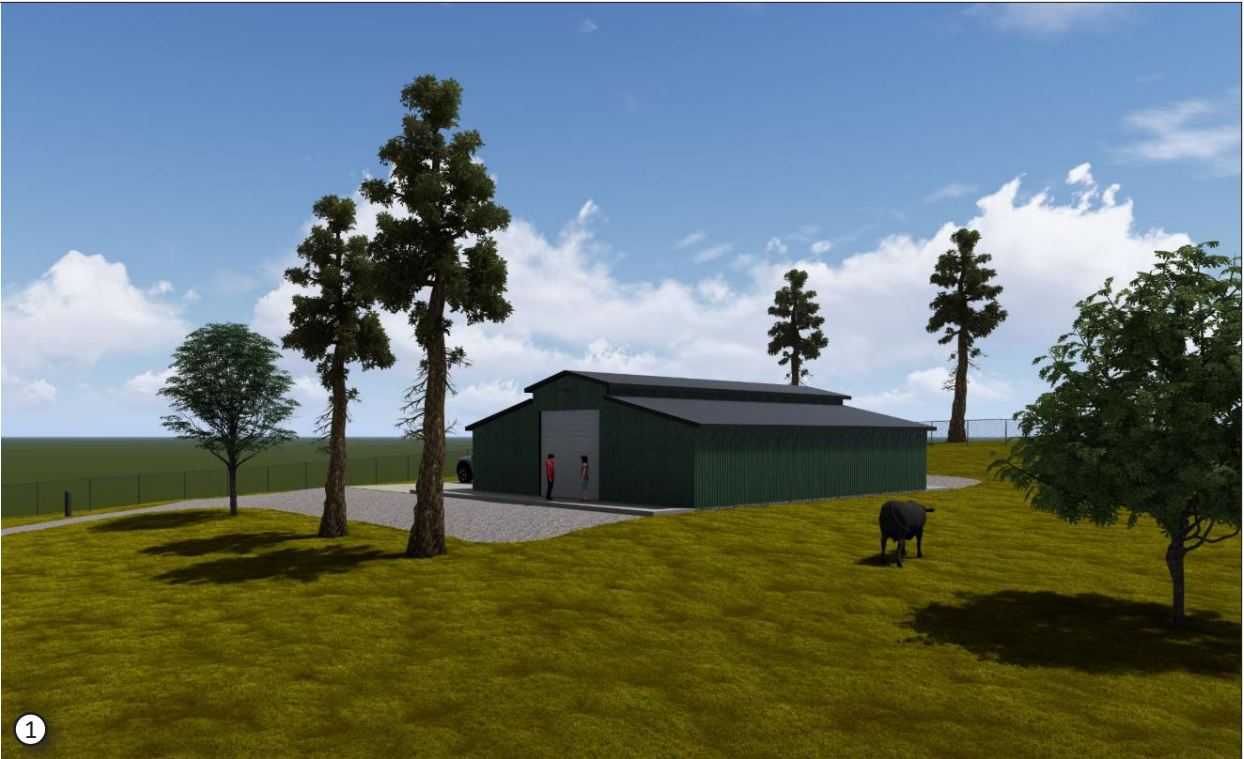
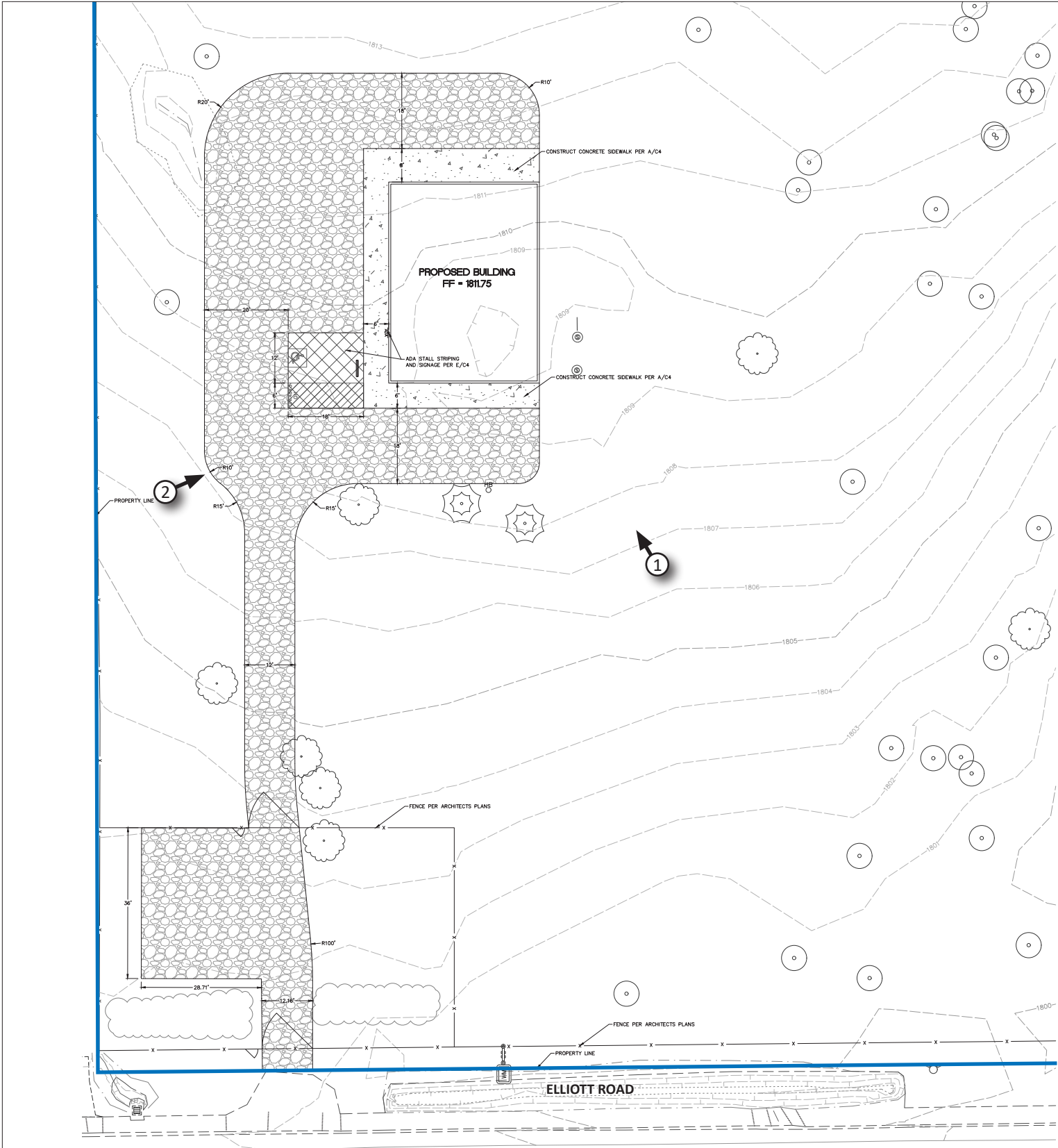


Source: Studio W Architects 2026.

Figure 2-4
Project Site Plan

2. PROJECT DESCRIPTION

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Source: Studio W Architects 2024.

Figure 2-5
Agricultural Building Site Plan

2. PROJECT DESCRIPTION

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2. PROJECT DESCRIPTION

2.5.4 Stadium/Practice Field

The proposed project would include the installation of a new football stadium and practice field on the project site, near the intersection of Maxwell Drive and Elliott Road. The new sports field would make up approximately four acres of the project site and would consist of a new PA system, bleachers, concession stand, and restrooms. The new stadium would be used for sporting events, graduation ceremonies, community events, and physical education for students at Paradise HS.

The proposed project would move some events that are currently held on the existing football stadium, including JV football, boys and girls soccer, and cross country, to the proposed new stadium and practice field. Events would consist of sports games and practices, other school events, and non-school events.

PA SYSTEM

The proposed project would include the implementation of a new permanent PA system, which would be used for games and school events only. The PA system would consist of four speakers.

BLEACHERS

The proposed project would include the implementation of new bleachers on the northern and southern side of the proposed field. The proposed bleachers would have a capacity of 2,500 spectators, with 1,500 spectators on the home side on the northern side of the field, and 1,000 spectators on the visitors' side on the southern side of the field.

EVENT SCHEDULING

The proposed improvements at Paradise HS may be used for sporting events and practices and other school events. The proposed event scheduling is contingent on District operational needs and may be modified at the District's discretion. Sporting events and practices are anticipated to consist of tackle football, girls and boys soccer, track and field, and band. The field may also be used for other school events, such as physical education classes and graduation. Table 2-5, *Paradise High School Proposed Athletics/Events Schedule*, shows the proposed sports activities, days, and times.

Similar to the existing athletics schedule, the tackle football season would begin in August and conclude in November. Junior varsity football is projected to include five home games that would be played on Fridays from 5:30 pm to 7:00 pm. Varsity tackle football schedule would include five home games per year on Fridays from 7:30 pm to 9:30 pm, which would be continued to be played at the existing football stadium. Additionally, the maximum number of attendees under the proposed project is expected to remain the same as existing conditions for junior varsity and varsity games. Tackle football uses on the proposed field would include

2. PROJECT DESCRIPTION

practices only. Home games would continue to be played at the existing Paradise HS football stadium.

Table 2-5 Proposed Paradise High School Athletics/Events Schedule

Activity/Use	Anticipated Number of Home Events	Days of Week	Times		Maximum Number of Attendees
			Start	End	
Tackle Football (August to November)					
Junior Varsity Football	5 per year	Friday	5:00 pm	7:00 pm	300
Varsity Football ¹	5 per year	Friday	7:30 pm	9:30 pm	0
Band (August to November)					
Band Practice	30 per year	Wednesday or Thursday	7:00 am	8:30 am	100
Soccer (December to February)					
Girls Varsity Soccer	14 per year	Tuesday, Wednesday, Thursday, Friday, Saturday ²	3:30 pm	5:30 pm	100
Boys Varsity Soccer	14 per year	Tuesday, Wednesday, Thursday, Friday, Saturday ²	3:30 pm	5:30 pm	100
Track and Field (August to November)					
Cross Country	10 per year	Wednesday, Thursday, Friday, or Saturday	3:30 pm	6:30 pm	100

Source: Paradise Unified School District, 2026.

1. Tackle football uses would include practices only.

2. Saturday events start at 7:00 a.m.

Band practices are anticipated approximately 30 times per year from 4:30 pm to 7:30 pm. Band practices utilizing the track and field would start in August and end in November. The band practice schedule would remain the same as the existing schedule and would allow for the same maximum number of attendees.

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Similar to the existing athletics schedule, the girls and boys soccer seasons are projected to begin in December and conclude in February. The girls varsity soccer team would play 14 home games per year on Tuesdays, Wednesdays, Thursdays, or Fridays, starting at 3:30 pm and ending at 5:30 pm. The boys varsity soccer team would play 14 home games per year on Tuesdays, Wednesdays, Thursday, or Fridays, starting at 3:30 pm and ending at 5:30 pm. Additionally, the maximum number of attendees under the proposed project is expected to remain the same as existing conditions for boys and girls soccer games.

The track and field season is projected to begin in August and end in November. The cross-country team would have 10 home events per year on Wednesdays, Thursdays, Fridays, or Saturdays, starting at 3:30 pm and ending at 6:30 pm. The maximum number of attendees under the proposed project is expected to remain the same as existing conditions.

The athletic field is anticipated to be utilized throughout the year for school events and non-school events until dusk, as required by the PUSD Policy 1330, *Use of School Facilities*, and the Civic Center Act. Facilities would be available to outside user groups to utilize the athletic field until dusk. The proposed schedule offers flexibility and may be subject to change. The District would have the authority to use the athletic field for practices and events based on specific needs; thus, the event schedule may be adjusted for different school and community events.

2.5.5 Project Construction

PROPOSED DEMOLITION

The proposed project would not include the demolition of any structures or buildings. However, the proposed project would include the removal of approximately 69,496 sf. of pavement on the project site. The proposed project would result in approximately 1,668 tons of debris that would be hauled off-site. Additionally, the proposed project would remove 18 existing on-site trees.

CONSTRUCTION SCHEDULE AND ACTIVITIES

Construction of the agriculture building is anticipated to be completed in approximately nine months, beginning in winter 2026 and ending in summer 2027. Construction of the new stadium and parking lot is anticipated to begin in 2030, with an opening date in 2031. Construction would include grading and excavation, trenching for site utilities, building construction, architectural coatings, and driveway and walkway construction. The construction schedule developed for the proposed project is considered conservative (i.e., it represents a “worst case” scenario).

During construction of the proposed project, vehicles, equipment, and materials would be staged and stored on the project site. No long-term staging of equipment would occur around the perimeter of the project site parcels, and no construction staging would occur in the public

2. PROJECT DESCRIPTION

right-of-way. The construction site and staging areas would be clearly marked, and construction fencing would be installed to prevent disturbance and safety hazards.

2.6 INTENDED USES OF THE EIR

2.6.1 Responsible and Trustee Agencies

LEAD AGENCY

The Paradise Unified School District is the lead agency under CEQA and has approval authority over the proposed project. Discretionary actions for the proposed project would include: (1) certification of the environmental document and (2) approval of the proposed project.

OTHER AGENCY ACTION REQUESTED

The District would require approval and/or coordination from the following agencies to implement the proposed project.

State Agencies

The District would seek approval of the proposed project from the Division of the State Architect (DSA). To qualify for state funding, California Department of Education (CDE) and DTSC approvals are required.

Local Agencies

No local agency approval would be needed for the proposed project.

2.6.2 Required Permits and Approvals

This is a project DEIR that examines the environmental impacts of the proposed project. This DEIR also addresses various actions by the District and others to adopt and implement the proposed project. It is the intent of this DEIR to evaluate the environmental impacts of the proposed project, thereby enabling the District, other responsible agencies, and interested parties to make informed decisions with respect to the requested entitlements. The anticipated discretionary actions required for this project are listed in Table 2-6, *Actions Required*.

The District is the lead agency under CEQA and is carrying out the proposed project; to approve the proposed project, the PUSD Board of Education must first certify the Final EIR (FEIR). The board would consider the information in the EIR when making its decision to approve or deny the proposed project, or in directing modifications to the proposed project in response to the EIR's findings and mitigation measures. The EIR is intended to disclose to the public the

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proposed project's details, analyses of the proposed project's potential environment impacts, and identification of feasible mitigation or alternatives that would lessen or reduce significant impacts to less than significant levels.

Table 2-6 Actions Required

Lead Agency	Action
Paradise Unified School District	- Consider Final EIR for certification - Adopt the Mitigation Monitoring and Reporting Program Approve the proposed project
Responsible Agencies	Action
Department of General Services, Division of the State Architect	Approval of construction drawings
Town of Paradise Fire Department	Approval of plans for emergency access and emergency evacuation.
California Department of Education	Approval of school site and design plans
Department of Toxic Substances Control	No Further Action Letter for Preliminary Environmental Assessment (PEA)

2.6.3 Related Review and Consultation Requirements

In accordance with Public Resources Code Section 21080.1(d), a lead agency is required to provide formal notification of intended development projects to Native American tribes that have requested to be on the lead agency's list for receiving such notification. The formal notification is required to include a brief description of the proposed project and its location, lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation. The proposed project is subject to Public Resources Code Section 21080.1(d) and would provide formal notification of the proposed project to Native American tribes that have requested to be on the lead agency's list for receiving notification.

2. PROJECT DESCRIPTION

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3. ENVIRONMENTAL ANALYSIS

This chapter examines the environmental setting of the proposed project, analyzes the effects of the proposed project and the significance of its impacts, and recommends mitigation measures to reduce or avoid impacts. This chapter has a separate section for each environmental topic.

The proposed project is analyzed for potential significant impacts in accordance with Appendix F, “Energy Conservation,” and Appendix G, “Environmental Checklist Form,” of the California Environmental Quality Act (CEQA) Guidelines. Environmental topics and their corresponding sections and abbreviations are:

3.1	Aesthetics (AES)	3.9	Hydrology and Water Quality (HYD)
3.2	Agricultural and Forestry Resources (AG)	3.10	Noise (NOI)
3.3	Air Quality (AQ)	3.11	Public Services (PS)
3.4	Biological Resources (BIO)	3.12	Transportation (TR)
3.5	Cultural Resources (CUL)	3.13	Tribal Cultural Resources (TCR)
3.6	Geology and Soils (GEO)	3.14	Utilities and Service Systems (USS)
3.7	Greenhouse Gas Emissions (GHG)	3.15	Wildfire (WIL)
3.8	Hazards and Hazardous Materials (HAZ)		

ORGANIZATION OF ENVIRONMENTAL ANALYSIS

To assist the reader with comparing information between environmental issues, each section is organized under the same major headings:

- **Regulatory Framework** offers an overview of applicable laws, regulations, plans, and policies relevant to each environmental topic.
- **Existing Conditions** offers a description of the existing environmental conditions, providing a baseline against which the impacts of the proposed project can be compared.
- **Standards for Analysis** refer to the quantitative or qualitative standards, performance levels, thresholds, or criteria used to evaluate whether an impact is significant. These standards are based primarily on the CEQA Guidelines unless otherwise noted. This section also provides an overview of key methods, assumptions, and considerations that inform the impact analysis.

3. ENVIRONMENTAL ANALYSIS

- **Project Impact Analysis** provides a detailed discussion of the potential direct and indirect impacts of the proposed project. Mitigation measures are included as necessary.
- **Cumulative Impact Analysis** provides an overview of the geographic setting and cumulative projects considered in the cumulative impact assessment. Significant cumulative impacts are identified, and mitigation measures are included as necessary.
- **References** are provided for information sources used in the development of the discussion.

LEVELS OF SIGNIFICANCE

The level of significance is identified for each impact in this Draft EIR. Although the criteria for determining significance are different for each topic area, the environmental analysis applies a uniform classification of the impacts based on definitions consistent with CEQA and the CEQA Guidelines:

- **No impact.** The project would result in no adverse effect on the environment.
- **Less than significant.** The project would not exceed the established significance criteria.
- **Significant.** The project would exceed the established significance criteria. For each significant impact, the DEIR identifies mitigation measures to reduce, eliminate, or avoid the adverse effect. If one or more mitigation measures would reduce the impact to a less-than-significant level successfully, this is stated in the DEIR.
- **Significant and unavoidable.** The project would exceed the established significance criteria, and no feasible mitigation measures are available to reduce the impact to a less-than-significant level.

SCOPING COMMENTS RECEIVED

During the CEQA-mandated scoping period for this DEIR, between March 13, 2026, and April 13, 2026, the District received comment letters from the Department of Forestry and Fire Protection, Native American Heritage Commission, and the California Department of Fish and Wildlife included in Appendix A of this DEIR.

EVALUATION METHODOLOGY

Under CEQA, the decision as to whether an environmental effect should be considered significant is reserved to the discretion of the lead agency, based on substantial evidence in the record as a whole, including views held by members of the public. An ironclad definition of significant effect is not always possible because the significance of an activity may vary based on

3. ENVIRONMENTAL ANALYSIS

the setting. Pursuant to CEQA Guidelines Section 15064(b), the analysis in this Draft EIR is based on scientific and factual data that has been reviewed by the lead agency and represents the lead agency's independent judgment and conclusions.

Baseline

This DEIR evaluates the impacts of the proposed project relative to existing conditions, as required by CEQA Guidelines Section 15126.2. Unless otherwise noted, the baseline represents the existing conditions on the ground (i.e., physical conditions) at the time that the Notice of Preparation (NOP) was issued on March 13, 2026.

Potential Effects of the Project on the Environment

The California Supreme Court concluded in *California Building Industry Association vs. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369 that "CEQA generally does not require an analysis of how existing environmental conditions will impact a project's future users or residents." *CBIA vs. BAAQMD* provided for several exceptions to the general rule where an analysis of the project on the environment is warranted:

1. If the project would exacerbate existing environmental hazards (such as exposing hazardous waste that is currently buried).
2. If the project qualifies for certain specified exemptions—certain housing projects and transportation priority projects pursuant to Public Resources Code (PRC) Sections 21159.21 (f),(h); 21159.22 (a),(b)(3); 21159.23 (a)(2)(A); 21159.24 (a)(1),(3); or 21155.1 (a)(4),(6).
3. If the project is exposed to potential noise and safety impacts on projects due to proximity to an airport (pursuant to PRC Section 21096).
4. School projects require specific assessment of certain environmental hazards (pursuant to PRC Section 21151.8).

Therefore, the evaluation of the significance of project impacts under CEQA focuses on the potential impacts of the proposed project on the environment, including whether the proposed project may exacerbate any existing environmental hazards. Existing environmental hazards in the project area include, but are not limited to, seismic hazards. Therefore, while the effects of this hazard on the proposed project are generally not subject to CEQA review following *CBIA vs. BAAQMD*, a discussion of the project's potential to exacerbate these hazardous conditions is provided in Section 3.6, *Geology and Soils*, of this DEIR.

3. ENVIRONMENTAL ANALYSIS

CUMULATIVE IMPACTS

A cumulative impact consists of an impact created as a result of the combination of the project evaluated in the DEIR, together with other reasonably foreseeable projects causing related impacts. CEQA Guidelines Section 15130 requires a DEIR to discuss cumulative impacts of a project when the project's incremental effect is "cumulatively considerable." Cumulative effects could occur when future development under the project is combined with development in the surrounding area or, in some instances, in the entire region.

Pursuant to CEQA Guidelines Section 15130(a)(3), where a cumulative impact is significant when compared to baseline conditions, the analysis must address whether the project's contribution to the significant cumulative impact is "considerable." If the contribution of the project is considerable, then the DEIR must identify potentially feasible measures that could avoid or reduce the magnitude of the project's contribution to a less-than-considerable level. If the project's contribution is not considerable, it is considered less than significant, and no mitigation for the project's contribution is required.

CEQA Guidelines Section 15130(b)(1) states that the information used in the analysis of cumulative impacts should come from one or two sources:

- A. A list of past, present, and probable future projects producing related cumulative impacts, including, if necessary, those projects outside the control of the agency; or
- B. A summary of projections contained in an adopted local, regional, or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such document shall be referenced and made available to the public at a location specified by the lead agency.

The cumulative discussions in Sections 3.1 through 3.15 explain the geographic scope of the area affected by each cumulative effect (e.g., immediate project vicinity, county, watershed, air basin), which depends on the environmental topic being analyzed. For example, in assessing macroscale air quality impacts, all development in the air basin contributes to regional emissions of criteria pollutants, and basin-wide projections of emissions are the best tool for determining the cumulative impact. In assessing aesthetic impacts, however, only development in the local area of change would contribute to a cumulative visual effect because the area of change is only visible near that area.

3.1 AESTHETICS

This section of the Draft Environmental Impact Report (DEIR) evaluates the Paradise High School Expansion Project's (proposed project) potential impacts on aesthetic and visual resources related to visual character, visual quality, and new sources of light and glare. The analysis in this section is based in part on the existing conditions of the current Paradise High School campus (Paradise HS or campus) and architectural renderings prepared for the proposed project.

During the Notice of Preparation (NOP) public review period, one comment was received regarding potential aesthetics impacts associated with the proposed project. The NOP is included as Appendix A of this DEIR.

3.1.1 Regulatory Framework

State and local laws, regulations, plans, or guidelines related to aesthetics that are applicable to the proposed project are summarized in this section.

STATE

California Building Code: Building Energy Efficiency Standards

Energy conservation standards for new residential and nonresidential buildings were adopted by the California Energy Resources Conservation and Development Commission (now the California Energy Commission) in June 1977 and most recently revised in 2018 (Title 24, Part 6, of the California Code of Regulations). The newly revised standards took effect on January 1, 2020. Title 24 requires the design of building shells and building components to conserve energy. It also requires outdoor lighting controls to reduce energy usage; in effect, this reduces outdoor lighting.

California Scenic Highway Program

The California legislature created the Scenic Highway Program to protect scenic highway corridors from changes that could diminish the aesthetic value of lands adjacent to the highways. The state regulations and guidelines governing the Scenic Highway Program are found in the Streets and Highways Code, Section 260. A highway is designated under this program when a local jurisdiction adopts a scenic corridor protection program, applies to the California Department of Transportation (Caltrans) for scenic highway approval, and receives notification from Caltrans that the highway has been designated as a scenic highway. Interstates, state highways, byways, and parkways are eligible for designation or for recognition as eligible for designation. California Streets and Highways Code Section 263 allows the California State Legislature the authority to identify highways as eligible for designation as a scenic highway. State scenic highways in California are either formally recognized by the California Department

3.1 AESTHETICS

of Transportation or meet the criteria outlined in the Streets and Highway Code, Section 260 of the California Scenic Highway Program.

LOCAL

Town of Paradise 1994 General Plan

The Paradise General Plan serves as the legal and policy foundation for all land use decisions within the Town of Paradise. It is a comprehensive expression of community values and long-term development goals, containing policy statements related to the distribution of future land uses across multiple elements, including land use, circulation, housing, noise, safety, open space/conservation/energy, and education and social services. Each element identifies issues, goals, objectives, policies, and specific implementation measures. The set of goals and policies listed is not an exhaustive list of all of the General Plan policies applicable to the proposed project; rather, it is a selection relevant to the impact discussion in this chapter.

Land Use Element

Goals

LUG-10: Encourage infill development consistent with open space needs, neighborhood character and infrastructure capacity.

Open Space/Conservation/Energy Element

Goals

OCEG-3: Preserve open space as necessary to protect the public health, safety and welfare, and to maintain the rural character of the community.

OCEG-5: Preserve the natural beauty and rural charm of Paradise.

Policies

- **OCEP-5.** The town shall strive to locate new buildings and other structures, including utility lines, that would otherwise block vistas or degrade the natural landscape, outside of scenic view corridors.
- **OCEP-14.** Reforestation and maintenance of trees shall be encouraged along road corridors.
- **OCEP-18.** Within the context that growth and development will occur, every effort should be made to preserve and enhance the views of surrounding lands, ridges, and canyons.
- **OCEP-19.** Viewsheds and natural areas along Skyway should be protected.

- **OCEP-20.** Views of development from other properties should be considered when making decisions on compatibility of development.

Town of Paradise Zoning Ordinance

The Town of Paradise Zoning Ordinance (Paradise Municipal Code Title 17) implements the Town's General Plan by establishing zoning districts and land use regulations that govern where and how development may occur, including permitted and conditional uses, density and intensity limits, development standards (such as building height, setbacks, lot coverage, parking, and lighting), and design review requirements; together, these provisions are intended to promote orderly growth, protect public health and safety, ensure compatibility between land uses, preserve community character and scenic resources, and provide a consistent regulatory framework for reviewing new development and redevelopment projects within the Town.

- **Section 17.06.810:** Requires that exterior lighting fixtures be designed and placed to reflect away from nearby residences within 200 feet and minimize glare and illumination onto adjoining properties.
- **Section 17.06.820:** Identifies scenic highway corridors and applies additional regulatory context to protect scenic views and limit land uses along those corridors.

3.1.2 Existing Conditions

VIEWSHEDS AND SCENIC VISTAS

The Town of Paradise General Plan has established gateway areas and scenic corridors to preserve scenic vistas in the area. Gateways identified in the Town of Paradise 1994 General Plan include the following areas:

- An area approximately 2,000 feet in circumference along the lower Skyway in the vicinity of the southern Sphere of Influence boundary.
- An area approximately 2,000 feet in circumference along lower Clark Road (Highway 191) in the vicinity of the southern Sphere of Influence boundary.
- An area approximately 2,000 feet in circumference along lower Pentz Road in the vicinity of the southern Sphere of Influence boundary.
- An area approximately 2,000 feet in circumference along lower Neal Road in the vicinity of the southern sphere of influence boundary.

3.1 AESTHETICS

The intent of establishing gateways and scenic highway corridors is to preserve the important scenic and visual resources of those areas along major streets within the town (Paradise 1994). The project site is not in a gateway area or along any scenic corridors.

Scenic Highways

A scenic highway is generally considered a stretch of public roadway that is designated as a scenic corridor by a federal, state, or local agency. California Department of Transportation (Caltrans) defines a scenic highway as any freeway, highway, road, or other public right-of-way that traverses an area of exceptional scenic quality. According to the California Scenic Highway Mapping System, the closest eligible state scenic highway is State Route 70 (SR-70), approximately 6 miles southeast of the project site. The nearest designated scenic highway is State Route 49 (SR-49), approximately 43 miles southeast of the project site (Caltrans 2025).

VISUAL CHARACTER AND LANDFORM

The Town of Paradise is in the western foothills of Sierra Nevada Mountains and is characterized by intervening ridges and valleys sloping to the southwest. The Town of Paradise is moderately forested with multiple vegetation communities and a mixed topography. Views range from valley and canyon panoramas to forest and ridge lines. From some vantage points, the Sutter Buttes and the Coastal Range are visible on clear days (Paradise 1994). The project site is essentially flat, and views from the project site are limited and obstructed by the surrounding environment, including existing structures and trees.

LIGHT AND GLARE

The two major causes of light pollution on the project site are spill light and glare from existing sources of light. Spill light is caused by misdirected light that illuminates outside the area intended to be lit. Glare is caused by a bright object against (or reflected off) a dark background or shiny surface. There are no existing sources of light on the project site. The project site is adjacent to the Paradise HS campus and is primarily surrounded by residential uses. Existing lighting from the Paradise HS campus included classroom lighting from existing buildings on campus, security lighting, field lights at the existing football stadium, and parking lot lighting throughout the campus. Off-site sources of light include street lighting, vehicular lighting, exterior lighting on existing residential uses, light emanating from building interiors, and building and security lights. The nearest light-sensitive receptors are the single-family residences to the east, south, and west of the project site.

3.1.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, “Environmental Checklist Form,” of the California Environmental Quality Act (CEQA) Guidelines states that, “except as provided in Public Resources Code Section 21099,” the proposed project would result in a significant aesthetic impact if it would:

- a) Have a substantial adverse effect on a scenic vista.
- b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.
- c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?
- d) Expose people on- or off-site to substantial light or glare, which would adversely affect day or nighttime views in the area.

METHODOLOGY

The analysis of aesthetic impacts in this section is based on a review of existing site conditions; surrounding land uses; and visual characteristics using site visits, aerial imagery, and project plans. Key considerations include visual character, scenic vistas, scenic resources, and light and glare. The evaluation is consistent with CEQA, the State CEQA Guidelines, and applicable Town policies and is informed by industry standards for visual impact assessment, including considerations of viewer sensitivity, changes in visual quality, and compatibility with existing land uses. Impacts are assessed using established significance thresholds to determine whether the proposed project would substantially degrade the existing visual environment or affect scenic resources.

3.1.4 Project Impact Analysis

a) Would the project have a substantial adverse effect on a scenic vista?

A scenic vista is a viewpoint that provides expansive views of a highly valued landscape for the benefit of the public. Some scenic vistas are officially designated by public agencies, and some

3.1 AESTHETICS

are informally designated by tourist guides. Vistas provide visual access or panoramic views to a large geographic area and are generally located at a point where surrounding views are greater than one mile away. Panoramic views are usually associated with vantage points over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views might include an urban skyline, valley, mountain range, large open space area, the ocean, or other water bodies. A substantial adverse effect to a scenic vista is one that degrades the view from such a designated view spot.

The Town of Paradise General Plan has established gateway areas and scenic corridors to preserve the scenic vistas. Paradise is in the western foothills of Sierra Nevada Mountains and is characterized by intervening ridges and valleys sloping to the southwest. The project site is not in a General Plan–identified gateway area or along a designated scenic corridor. Additionally, the project site does not function as a public vantage point that provides expansive views of surrounding landscapes. Views from and toward the project site are limited by the existing built environment and vegetation in the surrounding area, including structures and mature trees, which restrict long-distance sightlines. Because the project site does not give access to a recognized scenic vista, and the project would be developed outside areas identified for scenic protection in the General Plan, implementation of the proposed project would not obstruct or degrade a scenic vista. Therefore, **no impact** to scenic vistas would occur.

Significance without Mitigation: No impact.

b) Would the project substantially degrade the view from a scenic highway, including, but not limited to, trees, rock outcroppings, and historic buildings?

According to the California Scenic Highway Mapping System, the closest eligible state scenic highway is SR-70, approximately 6 miles southeast of the project site. The nearest designated scenic highway is SR-49, approximately 43 miles southeast of the project site (Caltrans 2025). The project site is not visible from either of the highways due to distance and intervening structures, vegetation, and landforms. The proposed project would be implemented entirely within the project site and would not damage scenic resources located within or near SR-70 or SR-49. Furthermore, no rock outcroppings or historic buildings are on-site; the project site is vacant and void of any buildings and structures. Therefore, project development would cause **no impact** to scenic resources within a state scenic highway.

Significance without Mitigation: No impact.

3.1 AESTHETICS

c) In nonurbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.)

According to the US Census Bureau, the project site is in the Town of Paradise, which had an estimated population of 9,114 in 2024 (USCB 2024). As defined under PRC Section 21071, Urbanized Area, Paradise does not meet the definition of an urbanized area. Therefore, the project site is not in an urbanized area.

CONSTRUCTION

Grading and construction activities associated with the proposed project have the potential to cause temporary degradation of local aesthetics for residents with views of the site from nearby public roadways and other publicly accessible vantage points. Construction activities such as stockpiling of materials, operation of construction equipment, and the presence of temporary fencing and staging areas may temporarily alter the visual character of the site. These activities could introduce visual elements that contrast with the surrounding environment and may temporarily reduce the visual quality of public views of the site and its immediate surroundings. However, these conditions would be short term and limited to the duration of site preparation and building construction.

Construction activities would be typical of development projects within the Town of Paradise and would not result in permanent alterations to the visual character of the Town beyond the project site. In addition, standard construction practices such as maintaining orderly staging areas and removing construction materials and debris following completion of work would limit the extent of visual disturbance. Because construction-related visual changes would be temporary and would cease upon completion of the proposed project, construction of the proposed project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. Therefore, impacts would be **less than significant**.

OPERATION

The project site is near the southern boundary of the Paradise HS campus and is surrounded by residential uses to the west, east, and south. The proposed project would add a new agricultural building, parking lot, and practice field/stadium to the project site to serve Paradise HS students and staff. The addition of these facilities would introduce new built elements to the site; however, these improvements would be consistent with the existing institutional character of the adjacent Paradise HS campus. The proposed project would be developed within an area that already supports school-related uses, and the scale and function of the proposed improvements would be similar to other educational and recreational facilities commonly associated with high school campuses. As a result, the proposed structures and improvements would not introduce

3.1 AESTHETICS

visual elements that are substantially inconsistent with the existing character of the area and would not conflict with regulations governing scenic quality.

Additionally, the portion of the project site that would include the proposed agricultural building has a general plan land use designation of Town Residential (TR) and is zoned Town Residential-1/2 (TR-1/2), both of which are intended for land areas that are planned for or are existing single-family residential areas characterized by small-sized parcels. Animal production/livestock is permitted in a TR-1/2 zone upon town approval and issuance of an administrative permit. However, the District is exempt from local zoning and does not require an administrative permit. Therefore, implementation of the proposed project would not conflict with applicable zoning or other regulations governing scenic quality,

Thus, the proposed project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings, and impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

d) Would the project expose people on- or off-site to substantial light or glare which would adversely affect day or nighttime views in the area?

There are no existing sources of light on the project site. The project site is adjacent to the Paradise HS campus and is primarily surrounded by residential uses. Existing lighting from the Paradise HS campus included classroom lighting from existing buildings on campus, security lighting, field lights at the existing football stadium, and parking lot lighting throughout the campus. Off-site sources of light include street lighting, vehicular lighting, exterior lighting on existing residential uses, light emanating from building interiors, and building and security lights. The nearest light-sensitive receptors are the single-family residences to the east, south, and west of the project site.

The proposed project would not include any high-intensity lighting such as those used for athletic fields or nighttime sports activity. Security and path lights would be directional and would not spill light onto nearby residential properties. All lights would be shielded to avoid light spill and glare onto adjacent properties. Lighting would not be of substantially greater intensity than existing lights near the project site, and nighttime views would not be significantly affected.

Therefore, the proposed project would not introduce additional day or nighttime illumination or glare beyond the existing ambient lighting conditions associated with nearby residential uses and the existing Paradise HS campus. The project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Therefore, impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

3.1.5 Cumulative Impact Analysis

Would the project have a cumulative effect related to aesthetics?

Development of the proposed project in combination with related projects in the surrounding area could incrementally alter visual character or introduce additional sources of light and glare. However, similar to the proposed project, related projects would be subject to applicable local regulations, design review processes, and environmental review, which would require project-specific evaluation of potential aesthetic impacts and implementation of mitigation measures if necessary. There are no other major improvement projects in the vicinity that would result in a contribution to cumulatively significant effects. Therefore, there are no known reasonably foreseeable cumulative projects in the immediate vicinity of the proposed project.

As discussed in Section 3.1.4, the proposed project would not result in any significant impacts related to scenic vistas, scenic highways, visual character and quality of public views, or nighttime light spill. Therefore, there is no contribution to cumulative impacts from the proposed project. Also, based on the relatively small and localized scale of the proposed project, and the fact that no other cumulative projects are identified in the area, the proposed project would not result in impacts that are individually limited but cumulatively considerable. Therefore, the proposed project's impacts would be **less than significant**.

Significance without Mitigation: Less than significant

3.1.6 References

Caltrans (California Department of Transportation). 2025. California State Scenic Highway System. <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>.

Paradise, Town of. 1994. Town of Paradise General Plan. <https://www.townofparadise.com/planning/page/town-paradise-general-plan>.

USCB (US Census Bureau). 2024. QuickFacts, Paradise town, California. <https://www.census.gov/quickfacts/fact/table/paradisetowncalifornia/PST045224#PST045224>.

3.1 AESTHETICS

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3.2 AGRICULTURE AND FORESTRY RESOURCES

This section of the Draft Environmental Impact Report (DEIR) evaluates the Paradise High School Expansion Project's (proposed project) potential impacts on agriculture and forestry resources. The analysis in this section is based in part on the existing conditions of the current Paradise High School campus (Paradise HS or campus) and architectural renderings prepared for the proposed project.

During the Notice of Preparation (NOP) public review period, one comment was received from the Department of Forestry and Fire Protection (CAL FIRE) regarding agricultural and forestry impacts associated with the proposed project. The NOP is included as Appendix A of this DEIR.

3.2.1 Regulatory Framework

Federal, state, and local laws, regulations, plans, or guidelines related to agricultural resources that are applicable to the proposed project are summarized below.

FEDERAL

Farmland Protection and Policy Act

The Farmland Protection and Policy Act (FPPA) was designed to minimize the impact that federal programs have on the unnecessary and irreversible conversion of farmland to non-agricultural uses. The FPPA assures that to the extent possible, federal programs are administered to be compatible with state, local units of government, and private programs and policies to protect farmland. Federal agencies are required to develop and review their policies and procedures to implement the FPPA every two years. This Act does not authorize the federal government to regulate the use of private or nonfederal land or, in any way, affect the property rights of owners. For the purposes of the act, "farmland" includes prime farmland, unique farmland, and farmland of statewide or local importance. Farmland subject to FPPA requirements does not have to be currently used for cropland, it can be forestland, pastureland, cropland, or other land, but not water or urban/built-up land.

STATE

Farmland Mapping and Monitoring Program

Along with the California Natural Resources Agency, the California Department of Conservation (CDOC), Division of Land Resource Protection (DLRP), provides services and information that promote informed land use decisions and sound management of the state's natural resources. DLRP manages the Farmland Mapping and Monitoring Program (FMMP), which supports agriculture throughout California by developing maps and statistical data for analyzing land use

3.2 AGRICULTURE AND FORESTRY RESOURCES

impacts on farmland. The FMMP is a non-regulatory program and provides consistent and impartial analysis of agricultural land use and land use changes throughout California.

The developed maps are called the Important Farmlands Inventory (IFI). The IFI categorizes land based on the productive capabilities of the land. There are many factors that determine the agricultural value of land, including the suitability of soils for agricultural use, whether soils are irrigated, the depth of soil, water-holding capacity, and physical and chemical characteristics. To categorize soil capabilities, two soil classification systems are used: the Capability Classification System and the Storie Index. The Capability Classification System categorizes soils from Class I to Class VII based on their capability to produce common cultivated crops and pasture plants without deteriorating over a long period of time (Class I soils have few limitations for agriculture; Class VIII soils are unsuitable for agriculture). The Storie Index takes into account other factors, such as slope and texture.

FMMP rates the production potential of agricultural land according to the following classifications (CDOC 2026).

- **Prime Farmland** has the best combination of physical and chemical features to sustain long-term agricultural production. Prime Farmland has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agriculture production at some time during the four years prior to the mapping date.
- **Farmland of Statewide Importance** is similar to Prime Farmland but with minor shortcomings, such as steeper slopes or less ability to store moisture. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.
- **Unique Farmland** consists of lesser quality soils used for the production of the state's leading agricultural crops. This land is usually irrigated but may include non-irrigated orchards or vineyards as found in some climatic zones in California. Land must have been cropped at some time during the four years prior to the mapping date.
- **Farmland of Local Importance** is land that is important to the local agricultural economy. It is determined by each county's board of supervisors and a local advisory committee.
- **Grazing Land** is the land on which the existing vegetation is suited to the grazing of livestock.
- **Urban and Built-Up Land** is occupied by structures with a building density of at least one unit to 1.5 acres, or approximately six structures to a 10-acre parcel. Common examples include residential, industrial, commercial, institutional facilities, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, and water control structures.
- **Other Land** is land not included in any other mapping category. Common examples include low density rural developments; wetlands and riparian areas not suitable for livestock grazing; confined livestock, poultry, and aquaculture facilities; and strip mines. Vacant and non-agricultural land surrounded on all sides by urban development and greater than

3.2 AGRICULTURE AND FORESTRY RESOURCES

40 acres is mapped as Other Land. The Rural Land Mapping Project provides more detail on the distribution of various land uses within the Other Land category in all eight San Joaquin Valley counties. The Rural Land categories include Rural Residential Land, Semi-agricultural and Rural Commercial Land, Vacant or Disturbed Land, Confined Animal Agriculture, and Non-agricultural or Natural Vegetation.

- **Water** is used to describe perennial water bodies with an extent of at least 40 acres.

Note that CEQA analysis focuses on impacts to three categories of mapped important farmland—Prime Farmland, Farmland of Statewide Importance, and Unique Farmland. In this section, the term “mapped important farmland” refers to these three categories of farmland combined.

California Land Conservation Act (Williamson Act)

The California Land Conservation Act, or Williamson Act, was adopted in 1965 (California Government Code §§ 51200 et. seq.). The act was established to encourage the preservation of agricultural lands in view of the increasing trend toward their “premature and unnecessary” urbanization. The act enables counties and cities to designate agricultural preserves (Williamson Act lands) and offer preferential taxation to agricultural landowners based on the land’s income-producing value. In return for the preferential tax rate, the landowner is required to sign a contract (Williamson contract) with the county or city agreeing not to develop the land for a minimum of 10 years. The contract is renewed automatically on its anniversary date unless a notice of nonrenewal or petition for cancellation is filed.

California Government Code Section 56064

This section of the California Government Code defines “Prime Agricultural Land.”

- Prime agricultural land means an area of land, whether single parcel or contiguous parcels, that has not been developed for a use other than an agricultural use and that meets any of the following qualifications:
- Land that qualifies, if irrigated, for rating as class I or class II in the United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) land use capability classification, whether or not land is actually irrigated, provided that irrigation is feasible.
- Land that qualifies for rating 80 through 100 Storie Index Rating.
- Land that supports livestock used for the production of food and fiber that has an annual carrying capacity equivalent to at least one animal unit per acre as defined by the USDA in the National Range and Pasture Handbook, Revision 1, December 2003.
- Land planted with fruit or nut-bearing trees, vines, bushes, or crops that have a nonbearing period of less than five years and that will return during the commercial bearing period on an annual basis from the production of unprocessed agricultural plant production not less than \$400 dollars per acre.

3.2 AGRICULTURE AND FORESTRY RESOURCES

- Land that has returned from the production of unprocessed agricultural plant products an annual gross value of not less than \$400 per acre for three of the previous five calendar years.

Z'Berg-Nejedly Forest Practices Act

The Z'Berg-Nejedly Forest Practices Act (FPA) of 1973 became effective on January 1, 1974, and established a nine-member Board of Forestry with control over forest practices and resources in California. The FPA requires that a Timber Harvest Plan (THP) be prepared by a Registered Professional Forester (RPF) for timber harvest on virtually all non-federal land. The Board of Forestry is the policy arm of the California Department of Forestry and Fire Protection (CAL FIRE), which is the enforcement branch.

Timberland Productivity Act of 1982

The California Timberland Productivity Act of 1982 (Government Code Sections 51100–51104) protects the state's forest resources by requiring local governments to zone timberland as Timberland Production Zones (TPZ). It restricts land to timber harvesting and compatible uses to discourage conversion to urban development.

Forest Practice Rules

The purpose of the Forest Practice Rules is to implement the provisions of the Z'berg-Nejedly Forest Practice Act of 1973 in a manner consistent with other laws, including but not limited to, the Timberland Productivity Act of 1982, CEQA, the Porter Cologne Water Quality Act, and the California Endangered Species Act. The provisions of the Forest Practice Rules are to be followed by RPFs in preparing THPs. The most recent version of the Forest Practice Rules was adopted in 2025.

CAL FIRE requires a Timberland Conversion Permit when converting timberland to non-timber uses. It requires a THP and a formal application, whereas smaller conversions (less than 3 acres) can use a "Less Than 3-Acre Conversion Exemption" to streamline the process. A permit is mandatory for conversion of timberland (defined under Public Resources Code Section 51104) to other uses, such as building a home or creating a subdivision.

REGIONAL

Butte County General Plan 2040

Butte County General Plan 2040 represents the County's basic community values with respect to land use, development, and conservation policy to govern Butte County through 2040. The Agriculture Element of the Butte County General Plan 2040 includes background information and identifies goals and policies for the protection of agricultural land in the county. The Conservation and Open Space Element includes goals and policies for the protection of natural

3.2 AGRICULTURE AND FORESTRY RESOURCES

resources within the county. The following goals and policies are relevant to the proposed project.

Agriculture Element

Goal AG-1: Protect, maintain, promote and enhance Butte County's agriculture uses and resources, a major source of food, employment and income in Butte County.

Goal AG-2: Protect Butte County's agricultural lands from conversion to non-agricultural uses.

Conservation and Open Space Element

Goal COS-11: Protect timber resources and promote sustainable timber production.

- **Policy COS-P11.1.** The County supports and promotes sustainable timber production.
- **Policy COS-P11.2.** The County shall support and cooperate with CAL FIRE in its responsibilities related to timber and forest practice laws.
- **Policy COS-P11.5.** Urban development shall not limit the financial sustainability of timber operations.
- **Policy COS-P11.8.** Public facilities shall generally not be located in the Timber Production Zone if the facility would have a significant adverse effect on the production of timber, unless alternative sites for an essential public use cannot be located elsewhere.

LOCAL

Town of Paradise Municipal Code

The Paradise Municipal Code outlines the local laws and regulations governing land use, development, and environmental protection within the town. Among its provisions, the municipal code includes specific measures that relate to the protection of trees.

- **Chapter 8.12, Felling, Removal, Destruction, Damaging, and Replacement of Trees:** Paradise Municipal Code requires a permit for the felling or removal of a qualifying tree, defined as any living woody perennial plant characterized by one or more main stems, or trunks, with at least one stem or trunk measuring either 31 inches or greater in circumference or 10 inches or greater in diameter at breast height (dbh). All tree measurements shall be taken at breast height, defined as four feet, six inches above natural grade, measured on the uphill side of the tree. A tree felling permit may be issued for a variety of reasons listed in the Paradise Municipal Code Section 8.12.090.
 - **Section 8.12.090, Felling of Trees:** Tree felling may be authorized where qualifying trees interfere with the construction or establishment of a town authorized structure or structure addition, driveway, parking lot or parking area, walkway, patio, swimming pool,

3.2 AGRICULTURE AND FORESTRY RESOURCES

or deck, or interfere with the construction of private or public access and/or drainage improvements. This provision also applies to trees located within areas approved by the town for grading or filling activities. Reasonable conditions may be imposed as part of the issuance of a tree felling permit.

Any permit application filed with town officials proposing the felling of nine or more qualifying trees from a single legal parcel within a twelve-month period shall include a written explanation by a qualified tree expert, submitted under penalty of perjury, demonstrating that felling is required based on the circumstances identified under Section 8.12.090 of this chapter.

- **Section 8.12.100, Damage to Trees:** It is unlawful for any person to damage a qualifying tree, including willfully face-cutting, girdling, or otherwise fatally injuring a qualifying tree, unless a valid tree felling permit has been issued. Additionally, no person shall trench, excavate, alter grades, place impervious surfacing, or cause mechanical damage within the root zone of a qualifying tree affecting more than 50 percent of the tree's dripline area prior to issuance of a tree felling permit.
- **Section 8.12.110, Protection of Trees During Construction:** All development shall be designed and constructed in a manner that considers the retention and protection of existing trees. No tree felling permit shall be issued for new commercial, community services, industrial, or residential construction until all required septic system construction permits have been issued and any required building permits have been filed with the town. Additionally, no tree felling permits will be issued to accommodate construction of roads, drainages, or other site improvements until all required improvement plans have been approved and signed by the town engineer. During construction, all trees not authorized for removal shall be protected from damage by construction equipment and activities.
- **Section 8.12.120, Tree Replacement/Tree Replacement Fee:**
 - A. For each qualifying tree felled to maintain or develop commercial, industrial, multiple-family, community service, or community facilities land uses, one five-gallon minimum size replacement tree of a tree species listed within subsection B of this section, except as provided within subsections C, D, E and F of this section, shall be planted by the permittee within 12 months thereafter or within one year of occupancy, whichever occurs first. Replacement trees shall be planted on the site where the tree or trees were felled. Any exceptions to the aforementioned tree planting requirement involving tree felling permits shall be submitted in writing to the planning commission, the planning director or to the town manager, as applicable, at or before the time that the tree felling permit application is acted upon. For development projects requiring a town-approved landscape plan that includes a significant percentage of replacement trees required by this section, the planning director, based upon a written review provided by a tree expert or a licensed landscape architect, may grant an exception to the number of replacement

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trees. Property owners shall receive tree planting in lieu credit for evidence protected natural saplings with a diameter between one inch to three inches and growing on the site for no more than 50 percent of the total number of qualifying trees authorized to be felled.

- B. The following is a list of suggested restocking species:
 - 1. Conifer Species
 - a. Ponderosa Pine, *Pinus ponderosa*
 - b. Sugar Pine, *Pinus lambertiana*
 - c. Douglas Fir, *Psuedosuga menziesii*
 - d. White Fir, *Abies concolor*
 - e. Incense Cedar, *Calocedrus decurrens*
 - f. Coast Redwood, *Sequoia sempervirens*
 - g. Sierra Redwood, *Sequoiadendron giganteum*
 - 2. Hardwood Species
 - a. Black Oak, *Quercus kelloggii*
 - b. Canyon Live Oak, *Quercus chrysolepis*
 - c. Blue Oak, *Quercus douglasii*
 - d. California Valley Oak, *Quercus lobata*
 - e. Scrub Oak, *Quercus Dumosa*
 - f. Big Leaf Maple, *Acer macrophyllum*
 - g. Western Dogwood, *Cornus nuttallii*
- C. There shall be established a tree replacement fund for the purpose of financing the replacement of felled trees.
- D. Whenever a tree felling permit is issued for the felling of trees on property that cannot accommodate the planting of replacement trees, the permittee shall pay an in-lieu fee identified in the town master fee schedule resolution for each qualifying tree to be felled.
- E. All fees collected pursuant to subsection D shall be deposited in the tree replacement fund and shall be used exclusively to plant and maintain trees on town- and/or publicly-owned property, or for the town to purchase, lease or otherwise acquire land or recorded rights for the planting and maintenance of trees.

3.2.2 Existing Conditions

SOILS

The project site is entirely underlain by Paradiso loam, 2 to 15 percent slopes. Paradiso loam typically experiences a mean annual precipitation range of approximately 35 to 73 inches and a mean annual air temperature range of approximately 54 to 59 degrees Fahrenheit (°F). The soil typically occurs at elevations of 1,220 to 3,730 feet. Paradiso loam is composed of slightly decomposed plant material, loam, clay loam, and clay, and the parent material consists of clayey

3.2 AGRICULTURE AND FORESTRY RESOURCES

residuum weathered from volcanic rock. The soil is well drained and exhibits medium runoff potential (NRCS 2026).

AGRICULTURAL USES

The western portion of Butte County is in the Sacramento Valley, which is a vast, flat floodplain and one of the best agricultural areas in the world. The farming environment in Butte County is rich with high quality soils that, together with the temperate Mediterranean climate, support a variety of crops, including fruits and nuts as well as field, seed, and vegetable crops. Other agricultural goods include livestock, apiaries, nursery plants, and timber (Paradise 1994).

According to FMMP, there are over 649,000 acres of land suited for agriculture and grazing in Butte County. The FMMP identifies four classes of farmland in Butte County, including Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Grazing Land. Prime Farmland is primarily located in the alluvial plain of the Sacramento Valley in the western portion of the county, and Grazing Land is primarily located in the mountain and foothill regions in the eastern portion of the county (Paradise 1994).

The project site is on land designated as Urban and Built-Up by the FMMP (CDOC 2022a). The NRCS does not designate the project site as Prime Farmland (NRCS 2026). The project site is zoned Town Residential (TR 1/2) and Community Services (CS) and is not zoned or within a land use designation for agricultural uses. The project site is not subject to a Williamson Act contract (CDOC 2022b). The project site previously held the First Assembly of God Church with associated parking lot and multiple residential structures, which burned down during the 2018 Camp Fire. Therefore, previous land uses were not agricultural in nature.

TIMBER

Timberlands in Butte County occupy approximately 341,000 acres, including most of the northern and eastern portions of the county. Timberlands in Butte County are at elevations between approximately 2,200 and 6,200 feet, and the major vegetation community associated with timberlands is westside mixed conifer (Sierra mixed conifer), which is dominated by sugar pine, ponderosa pine, Douglas fir, white fir, and incense cedar. Approximately 27 percent of timberlands in the county are on national forest land (Paradise 1994).

The project site consists of a predominantly vacant field with existing/remnant structures in the central and eastern portion of the project site and non-native ornamental and ruderal vegetation. Native tree species are intermittent along the perimeter of the property, including California black oak (*Quercus kelloggii*), Ponderosa pine (*Pinus ponderosa*), whiteleaf manzanita (*Arctostaphylos viscida*), and California incense-cedar (*Calocedrus decurrens*). Based on correspondence with the CAL FIRE Butte Unit, the project site contains timberland under

3.2 AGRICULTURE AND FORESTRY RESOURCES

California Public Resources Code Section 4526 and Government Code Section 51104(g) (CAL FIRE 2026). Previous land uses were not forest or timber related.

3.2.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, “Environmental Checklist Form,” of the California Environmental Quality Act (CEQA) Guidelines states that, “In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.” The proposed project would result in a significant impact to agricultural and forestry resources if it would:

- a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.
- b) Conflict with existing zoning for agricultural use, or a Williamson Act contract.
- c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)).
- d) Result in the loss of forest land or conversion of forest land to non-forest use.
- e) Involve other changes in the existing environment that, due to their location or nature, could result in conversion of farmland to nonagricultural use or conversion of forest land to non-forest use.

METHODOLOGY

The following environmental evaluation is based on a review of the CDOC FMMP, CDOC Williamson Act Enrollment Finder, consultation with the CAL FIRE Butte Unit, and the Paradise

3.2 AGRICULTURE AND FORESTRY RESOURCES

Zoning Ordinance to determine the presence or absence of agricultural and forestry resources at the project site.

3.2.4 Project Impact Analysis

-
- a) **Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?**
-

The project site is currently vacant following the destruction of former church and residential structures during the 2018 Camp Fire. The project site is on land designated as Urban and Built-Up by the FMMP (CDOC 2022a). Urban and Built-Up land is classified as land occupied by structures with a building density of at least one unit per 1.5 acres, or land used for industrial, commercial, institutional, public, or residential purposes (CDOC 2026). The NRCS does not designate the project site as Prime Farmland (NRCS 2026). Therefore, the project site would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use, and **no impact** would occur.

Significance without Mitigation: No impact.

-
- b) **Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?**
-

The project site is zoned TR 1/2 and CS and is not zoned for agricultural uses. The proposed project is consistent with these zoning designations and would not introduce land uses that conflict with the applicable zoning regulations. Further, the project site is not subject to a Williamson Act contract, and implementation of the proposed project would not interfere with the preservation of agricultural lands (CDOC 2022b). Therefore, the project would not conflict with existing zoning for agricultural use or a Williamson Act contract, and **no impact** would occur.

Significance without Mitigation: No impact.

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c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

The project site is not zoned Timberland Production Zone (TPZ) pursuant to Government Code Section 51104(g), and the proposed project would not rezone the property or conflict with existing zoning for timberland or TPZ lands.

California Public Resources Code Section 12220(g) defines forest land as land capable of supporting 10 percent native tree cover under natural conditions. The project site is primarily a vacant field with remnant structures and non-native ornamental and ruderal vegetation, with intermittent native trees primarily along the perimeter of the property. Though the site contains native tree species, it does not support sufficient native tree cover to meet the statutory definition of forest land and, therefore, does not meet the definition of forest land under California Public Resources Code Section 12220(g).

However, based on correspondence with the CAL FIRE Butte Unit, the project site is considered timberland pursuant to California Public Resources Code Section 4526 (CAL FIRE 2026). Section 4526 defines timberland as land capable of growing a crop of trees of a commercial species used to produce lumber or other forest products. The District is coordinating with CAL FIRE to obtain a Timberland Conversion Permit pursuant to the Z'berg-Nejedly Forest Practice Act to authorize the proposed conversion of timberland to a non-timber use. Compliance with the Timberland Conversion Permit process and applicable State and local regulations would ensure that the conversion of timberland occurs in accordance with California law.

The project site has not been historically used for timber production; it was previously developed with the First Assembly of God Church, associated parking areas, and residential structures that were destroyed during the 2018 Camp Fire. As such, the site has not functioned as commercial timberland and is not currently managed for timber production. Additionally, due to its location adjacent to the Paradise HS campus, the surrounding pattern of institutional and residential development, and its location in a Very High Fire Hazard Severity Zone, the site is unlikely to be used for commercial timber production in the future. Although the project would convert timberland to a developed institutional use through the required Timberland Conversion Permit process, it would not conflict with existing zoning or cause the rezoning of forest land, timberland, or timberland zoned Timberland Production in which impacts would be significant. Therefore, impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

3.2 AGRICULTURE AND FORESTRY RESOURCES

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

California Public Resources Code Section 12220(g) defines forest land as land capable of supporting 10 percent native tree cover under natural conditions. The project site does not support this level of native tree cover and is not managed for forest resources. The project site is predominantly a vacant field with remnant structures from previous development and is characterized by non-native ornamental and ruderal vegetation. Native tree species, including California black oak, ponderosa pine, whiteleaf manzanita, and California incense-cedar, occur intermittently along the perimeter of the property, but the site does not support sufficient native tree cover to meet the statutory definition of forest land.

Implementation of the proposed project would require the removal of approximately 18 trees; however, because the site does not qualify as forest land, tree removal would not result in the loss or conversion of forest land to non-forest use. Tree removal would be subject to applicable State and local regulations, including the Z'Berg-Nejedly Forest Practice Act and Paradise Municipal Code Section 8.12.120; however, these requirements do not affect the conclusion that no forest land would be lost or converted. Therefore, the proposed project would not result in the loss or conversion of forest land, and impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

e) Would the project involve other changes in the existing environment, which, due to their location or nature, could result in conversion of farmland to non-agricultural use or conversion of forest land to non-forest use?

The project site consists of a predominantly vacant and previously disturbed field with landscaped ruderal vegetation, remnants of a former parking lot, and storage containers. The site was previously developed with the First Assembly of God Church, associated parking areas, and residential structures that were destroyed during the 2018 Camp Fire. The site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance by the Farmland Mapping and Monitoring Program; is not zoned for agricultural uses; and is not subject to a Williamson Act contract. Therefore, the proposed project would not result in conversion of farmland to non-agricultural use. California Public Resources Code Section 12220(g) defines forest land as land capable of supporting 10 percent or more native tree cover under natural conditions. The project site is predominantly a vacant field with remnant structures from previous development and is characterized by non-native ornamental and ruderal vegetation. Native tree species, including California black oak, ponderosa pine, whiteleaf manzanita, and California incense-cedar, occur intermittently along the perimeter of the property. Although native trees are present, the project site does not support sufficient native

3.2 AGRICULTURE AND FORESTRY RESOURCES

tree cover to meet the statutory definition of forest land under Public Resources Code Section 12220(g).

Implementation of the proposed project would require the removal of approximately 18 trees. Based on correspondence with the CAL FIRE Butte Unit, the project site is considered “timberland” pursuant to Public Resources Code Section 4526, and the District is obtaining a Timberland Conversion Permit from CAL FIRE in accordance with the Z'berg-Nejedly Forest Practice Act to authorize the conversion of timberland associated with the proposed project. Tree removal and timberland conversion would occur in compliance with the conditions of that permit, as well as applicable local regulations, including Paradise Municipal Code Section 8.12.120.

Because the project site does not meet the statutory definition of forest land, the proposed project would not result in the loss or conversion of forest land. Although the project would convert timberland, that conversion would occur pursuant to the required Timberland Conversion Permit and would not result in a significant impact related to the loss or conversion of forest land. Therefore, impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

3.2.5 Cumulative Impact Analysis

Would the project have a cumulative effect related to agriculture and forestry resources?

As defined in Section 15130 of the CEQA Guidelines, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, present, and reasonably foreseeable future projects. The geographic context for cumulative impacts related to agriculture and forestry resources includes the project site and surrounding area within the Town of Paradise.

The project site and surrounding area are developed or previously disturbed and do not contain agricultural lands or forest land as defined by California Public Resources Code Section 12220(g). Although CAL FIRE has identified the project site as containing timberland pursuant to Public Resources Code Section 4526, the District is obtaining a Timberland Conversion Permit from CAL FIRE in accordance with the Z'berg-Nejedly Forest Practice Act to authorize the proposed conversion of timberland associated with the project. The project site is not zoned as TPZ, and the proposed project would not conflict with existing zoning or result in the rezoning of timberland or TPZ lands.

Implementation of the proposed project and other reasonably foreseeable development in the area could result in the removal of individual trees and the conversion of limited areas of

3.2 AGRICULTURE AND FORESTRY RESOURCES

timberland where authorized; however, such activities would not result in the conversion of agricultural land or forest land. Tree removal would occur in accordance with applicable State and local regulatory requirements, including the Timberland Conversion Permit process administered by CAL FIRE and Paradise Municipal Code Section 8.12.120. Compliance with these regulatory requirements would minimize the incremental contribution of the proposed project to cumulative impacts on forestry resources.

Therefore, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not make a cumulatively considerable contribution to impacts related to agricultural or forestry resources. Cumulative impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

3.2.6 References

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3.3 AIR QUALITY

This section of the Draft Environmental Impact Report (DEIR) evaluates the Paradise High School Expansion Project's (proposed project) potential impacts on ambient air quality and the exposure of people, especially sensitive individuals, to unhealthy pollutant concentrations.

The evaluation in this section is based on the methodology recommended by the Butte County Air Quality Management District (BCAQMD). In this section, "emissions" refers to the actual quantity of pollutant measured in pounds per day (lbs./day), and "concentrations" refers to the amount of pollutant material per volumetric unit of air. Concentrations are measured in parts per million (ppm), parts per billion (ppb), or micrograms per cubic meter ($\mu\text{g}/\text{m}^3$). The analysis is also based in part on the following technical report.

- *Air Quality and Greenhouse Gas Emissions Data*, PlaceWorks, March 2026

A complete copy of this technical report is provided in Appendix B of this DEIR.

During the Notice of Preparation (NOP) public review period, one comment was received regarding air quality impacts. The NOP is included as Appendix A of this DEIR.

Terminology

The following defines terminology commonly referred to in this analysis:

- **AAQS.** Ambient Air Quality Standards
- **CES.** CalEnviroScreen. CES is a mapping tool that helps identify the California communities most affected by sources of pollution and where people are often especially vulnerable to pollution's effects.
- **Concentrations.** Refers to the amount of pollutant material per volumetric unit of air. Concentrations are measured in parts per million (ppm), parts per billion (ppb), or micrograms per cubic meter ($\mu\text{g}/\text{m}^3$).
- **Criteria Air Pollutants.** Those air pollutants specifically identified for control under the Federal Clean Air Act (currently seven—carbon monoxide, nitrogen oxides, lead, sulfur oxides, ozone, and coarse and fine particulates).
- **DPM.** Diesel particulate matter.
- **Emissions.** The mass quantity of pollutants, measured in pounds per day or tons per year.
- **GHG.** Greenhouse gas.

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- $\mu\text{g}/\text{m}^3$. Micrograms per cubic meter.
- **VMT**. Vehicle miles traveled.

3.3.1 Regulatory Framework

FEDERAL AND STATE

Federal and State agencies and local air districts have passed laws and regulations to control and enhance air quality. Development of the proposed project is subject to the rules and regulations imposed by the United States Environmental Protection Agency (EPA), California Air Resources Board (CARB), the California Environmental Protection Agency (CalEPA), and BCAQMD.

Ambient Air Quality Standards

The federal Clean Air Act (CAA) was passed in 1963 by the United States Congress and has been amended several times. The 1970 federal CAA amendments strengthened previous legislation and laid the foundation for the regulatory scheme of the 1970s and 1980s. In 1977, Congress again added several provisions, including nonattainment requirements for areas not meeting National Ambient Air Quality Standards (AAQS) and the Prevention of Significant Deterioration program. The 1990 amendments represent the latest in a series of federal efforts to regulate the protection of air quality in the United States. The CAA allows states to adopt more stringent standards or include other pollutants. The California CAA, signed in 1988, requires all areas of the state to achieve and maintain the California AAQS by the earliest practical date. The California AAQS tend to be more restrictive than the National AAQS.

The National and California AAQS are the levels of air quality considered to provide a margin of safety in the protection of the public health and welfare. They are designed to protect “sensitive receptors” most susceptible to further respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and persons engaged in strenuous work or exercise. Healthy adults can tolerate occasional exposure to air pollutant concentrations considerably above these minimum standards before adverse effects are observed.

Both California and the federal government have established health-based AAQS for seven air pollutants, which are shown in Table 3.3-1, *Ambient Air Quality Standards for Criteria Pollutants*. These pollutants are ozone (O_3), nitrogen dioxide (NO_2), carbon monoxide (CO), sulfur dioxide (SO_2), coarse inhalable particulate matter (PM_{10}), fine inhalable particulate matter ($\text{PM}_{2.5}$), and lead (Pb). In addition, the State has set standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. These standards are designed to protect the health and welfare of the populace with a reasonable margin of safety.

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Table 3.3-1 Ambient Air Quality Standards for Criteria Pollutants

Pollutant	Averaging Time	California Standard¹	Federal Primary Standard²	Major Pollutant Sources
Ozone (O ₃) ³	1 hour	0.09 ppm	*	Motor vehicles, paints, coatings, and solvents.
	8 hours	0.070 ppm	0.070 ppm	
Carbon Monoxide (CO)	1 hour	20 ppm	35 ppm	Internal combustion engines, primarily gasoline-powered motor vehicles.
	8 hours	9.0 ppm	9 ppm	
Nitrogen Dioxide (NO ₂)	Annual Arithmetic Mean	0.030 ppm	0.053 ppm	Motor vehicles, petroleum-refining operations, industrial sources, aircraft, ships, and railroads.
	1 hour	0.18 ppm	0.100 ppm	
Sulfur Dioxide (SO ₂) ⁴	Annual Arithmetic Mean	*	0.010 ppm	Fuel combustion, chemical plants, sulfur recovery plants, and metal processing.
	1 hour	0.25 ppm	0.075 ppm	
	24 hours	0.04 ppm	*	
Respirable Coarse Particulate Matter (PM ₁₀)	Annual Arithmetic Mean	20 µg/m ³	*	Dust and fume-producing construction, industrial, and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities (e.g., wind-raised dust and ocean sprays).
	24 hours	50 µg/m ³	150 µg/m ³	
Respirable Fine Particulate Matter (PM _{2.5}) ^{5,6}	Annual Arithmetic Mean	12 µg/m ³	9 µg/m ³	Dust and fume-producing construction, industrial, and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities (e.g., wind-raised dust and ocean sprays).
	24 hours	*	35 µg/m ³	
Lead (Pb)	30-Day Average	1.5 µg/m ³	*	Present source: lead smelters, battery manufacturing & recycling facilities. Past source: combustion of leaded gasoline.
	Calendar Quarter	*	1.5 µg/m ³	
	Rolling 3-Month Average	*	0.15 µg/m ³	
Sulfates (SO ₄) ⁷	24 hours	25 µg/m ³	*	Industrial processes.
Visibility Reducing Particles	8 hours	ExCo =0.23/km	No Federal Standard	Visibility-reducing particles consist of suspended particulate matter, which is a complex mixture of tiny

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Table 3.3-1 Ambient Air Quality Standards for Criteria Pollutants

Pollutant	Averaging Time	California Standard ¹	Federal Primary Standard ²	Major Pollutant Sources
		visibility of 10≥ miles		particles that consists of dry solid fragments, solid cores with liquid coatings, and small droplets of liquid. These particles vary greatly in shape, size, and chemical composition, and can be made up of many different materials such as metals, soot, soil, dust, and salt.
Hydrogen Sulfide (H ₂ S)	1 hour	0.03 ppm	No Federal Standard	Hydrogen sulfide is a colorless gas with the odor of rotten eggs. It is formed during bacterial decomposition of sulfur-containing organic substances. Also, it can be present in sewer gas and some natural gas and can be emitted as the result of geothermal energy exploitation.
Vinyl Chloride (chloroethene)	24 hours	0.01 ppm	No Federal Standard	Vinyl chloride, a chlorinated hydrocarbon, is a colorless gas with a mild, sweet odor. Most vinyl chloride is used to make polyvinyl chloride (PVC) plastic and vinyl products. Vinyl chloride has been detected near landfills, sewage plants, and hazardous waste sites, due to microbial breakdown of chlorinated solvents.

Source: CARB 2024; USEPA 2025b.

Notes: ppm: parts per million; µg/m³: micrograms per cubic meter

* Standard has not been established for this pollutant/duration by this entity.

1. California standards for O₃, CO (except 8-hour Lake Tahoe), SO₂ (1 and 24 hour), NO₂, and particulate matter (PM₁₀, PM_{2.5}, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
2. National standards (other than O₃, PM, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The O₃ standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM₁₀, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m³ is equal to or less than one. For PM_{2.5}, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard.

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3. On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.
4. On December 27, 2024, the secondary annual SO₂ standard was revised to an annual average, averaged over three consecutive years, with a level of 10 parts per billion (ppb).
5. On December 14, 2012, the national annual PM_{2.5} primary standard was lowered from 15 µg/m³ to 12.0 µg/m³. The existing national 24-hour PM_{2.5} standards (primary and secondary) were retained at 35 µg/m³, as was the annual secondary standard of 15 µg/m³. The existing 24-hour PM₁₀ standards (primary and secondary) of 150 µg/m³ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
6. On February 7, 2024, the national annual PM_{2.5} standard was lowered from 12 µg/m³ to 9 µg/m³. The existing national 24-hour PM_{2.5} standards (primary and secondary), secondary annual PM_{2.5} standard, and PM₁₀ standards (primary and secondary) were retained
7. On June 2, 2010, a new 1-hour SO₂ standard was established and the existing 24-hour and annual primary standards were revoked. The 1-hour national standard is in units of ppb. California standards are in units of ppm. To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.

California has also adopted a host of other regulations that reduce criteria pollutant emissions.

- **AB 1493: Pavley Fuel Efficiency Standards.** Pavley I is a clean-car standard that reduces emissions from new passenger vehicles (light-duty auto to medium-duty vehicles) from 2009 through 2016. In January 2012, CARB approved the Advanced Clean Cars program (formerly known as Pavley II) for model years 2017 through 2025.
- **Heavy-Duty (Tractor-Trailer) Greenhouse Gas (GHG) Regulation.** The tractors and trailers subject to this regulation must either use EPA SmartWay certified tractors and trailers or retrofit their existing fleet with SmartWay-verified technologies. The regulation applies primarily to owners of 53-foot or longer box-type trailers, including both dry-van and refrigerated-van trailers, and owners of the heavy-duty tractors that pull them on California highways. These owners are responsible for replacing or retrofitting their affected vehicles with compliant aerodynamic technologies and low-rolling-resistance tires. Sleeper-cab tractors model year 2011 and later must be SmartWay certified. All other tractors must use SmartWay-verified low-rolling-resistance tires. This rule has criteria air pollutant co-benefits.
- **SB 1078 and SB 107: Renewables Portfolio Standards.** A major component of California's Renewable Energy Program is the renewables portfolio standard established under Senate Bill (SB) 1078 (Sher) and SB 107 (Simitian). Under this standard, certain retail sellers of electricity were required to increase the amount of renewable energy each year by at least 1 percent to reach at least 20 percent by December 30, 2010.
- **California Code of Regulations (CCR) Title 20: Appliance Energy Efficiency Standards.** The 2006 Appliance Efficiency Regulations (Title 20 CCR Sections 1601–1608) were adopted by the California Energy Commission on October 11, 2006, and approved by the California Office of Administrative Law on December 14, 2006. The regulations include standards for

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both federally regulated appliances and non–federally regulated appliances. This code reduces natural gas use from appliances.

- **Title 24 CCR Part 6: Building and Energy Efficiency Standards.** Energy conservation standards for new residential and nonresidential buildings adopted by the California Energy Resources Conservation and Development Commission (now the California Energy Commission) in June 1977. This code reduces natural gas use from buildings.
- **Title 24 CCR Part 11: Green Building Standards Code.** Establishes planning and design standards for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants. This code reduces natural gas use from buildings.

In May 2025, Congress passed three Congressional Review Act (CRA) resolutions to nullify a set of California’s CAA preemption waivers targeting California’s vehicle emissions program (Holland & Knight 2025).

- **H.J.Res. 87** disapproves the EPA’s waiver for multiple California heavy-duty vehicle programs, including Advanced Clean Trucks (requiring increasing percentages of zero-emission truck sales), Zero Emission Airport Shuttles and Zero-Emission Power Train Certification.
- **H.J.Res. 88** disapproves the EPA’s waiver for Advanced Clean Cars II, which required all new passenger cars, trucks, and SUVs sold in California to be zero-emission by 2035.
- **H.J.Res. 89** disapproves the EPA’s waiver for the "Omnibus" Low NO_x regulation, which establishes more stringent emissions standards for heavy-duty vehicles.

California Air Resources Board

CARB is a part of CalEPA and is responsible for the coordination and administration of both federal and state air pollution control programs in California. In this capacity, CARB conducts research, sets the California AAQS (see Table 3.3-1), compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB establishes emissions standards for motor vehicles sold in California, consumer products (such as hairspray, aerosol paints, and barbecue lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions. CARB has primary responsibility for the development of California’s State Implementation Plan (SIP), working closely with the federal government and the local air districts. The SIP is required for the state to take over implementation of the federal CAA from the EPA.

Nuisance Regulations

Health and Safety Code Section 41700 states,

... a person shall not discharge from any source whatsoever quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any of those persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property.

This section also applies to objectionable odors.

Tanner Air Toxics Act and Air Toxics Hot Spot Information and Assessment Act

Public exposure to toxic air contaminants (TACs) is a significant environmental health issue in California. In 1983, the California legislature enacted a program to identify the health effects of TACs and reduce exposure to them. The California Health and Safety Code defines a TAC as “an air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health” (Title 17 CCR Section 93000). A substance that is listed as a hazardous air pollutant pursuant to Section 112(b) of the federal CAA (Title 42 United States Code Section 7412[b]) is a toxic air contaminant. Under State law, the CalEPA, acting through CARB, is authorized to identify a substance as a TAC if it is an air pollutant that may cause or contribute to an increase in mortality or serious illness, or may pose a present or potential hazard to human health.

California regulates TACs primarily through Assembly Bill (AB) 1807 (Tanner Air Toxics Act) and AB 2588 (Air Toxics “Hot Spot” Information and Assessment Act of 1987). The Tanner Air Toxics Act set up a formal procedure for CARB to designate substances as TACs. Once a TAC is identified, CARB adopts an “airborne toxics control measure” for sources that emit that TAC. If there is a safe threshold for a substance (i.e., a point below which there is no toxic effect), the control measure must reduce exposure to below that threshold. If there is no safe threshold, the measure must incorporate “toxics best available control technology” to minimize emissions. To date, CARB has established formal control measures for 11 TACs that are identified as having no safe threshold.

Under AB 2588, TAC emissions from individual facilities are quantified and prioritized by the air quality management district or air pollution control district. High-priority facilities are required to perform a health risk assessment, and, if specific thresholds are exceeded, are required to communicate the results to the public through notices and public meetings.

CARB has promulgated the following specific rules to limit TAC emissions:

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- **Title 13 CCR Chapter 10, Section 2485: Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling.** Generally restricts on-road diesel-powered commercial motor vehicles with a gross vehicle weight rating of greater than 10,000 pounds from idling more than five minutes.
- **Title 13 CCR Chapter 10, Section 2480: Airborne Toxic Control Measure to Limit School Bus Idling and Idling at Schools.** Generally restricts a school bus or transit bus from idling for more than five minutes when within 100 feet of a school.
- **Title 13 CCR Section 2477 and Article 8: Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets and Facilities Where TRUs Operate.** Regulations established to control emissions associated with diesel-powered TRUs.

REGIONAL

Butte County Air Quality Management District

BCAQMD is the local air district responsible for local air quality regulation in Butte County. BCAQMD's primary responsibility is to regulate stationary sources and develop plans to achieve and maintain air quality standards. CARB and the EPA have jurisdiction over controlling emissions from mobile sources. BCAQMD has jurisdiction over air quality matters in Butte County. Formerly a department of the Butte County government, it is now an independent special district under California law.

BCAQMD's mission to improve air quality includes adopting and enforcing rules and regulations to attain and maintain air quality standards, issuing permits for and inspecting stationary sources of air pollutants, responding to citizen complaints, monitoring air quality and meteorological conditions, awarding grants to reduce mobile emissions, implementing public outreach campaigns, assisting Butte County jurisdictions in addressing climate change, and updating and evaluating consistency with the Northern Sacramento Valley Air Quality Attainment Plan. The Air Pollution Control Districts and Air Quality Management Districts for the counties located in the northern portion of the Sacramento Valley together establish the Northern Sacramento Valley Planning Area (NSVPA). The NSVPA and Butte, Colusa, Glenn, Shasta, Sutter, Tehama, and Yuba counties agreed to jointly prepare the Northern Sacramento Valley Air Quality Attainment Plan.

The stationary "direct" sources of air contaminants over which BCAQMD has permit authority include, but are not limited to, power plants, gasoline stations, dry cleaners, internal combustion engines, and surface-coating operations. BCAQMD does not, however, exercise permit authority over "indirect" emission sources. Indirect sources are contributors to air pollution and include facilities and land uses that may not emit significant amounts of pollution directly themselves, but are responsible for indirect emissions, such as:

- Motor vehicle trips attracted to or generated by a land use.
- On-site combustion of natural gas and propane for heating.
- Architectural coatings (paints, stains) and consumer products.
- Landscape maintenance.

BCAQMD also works with the Butte County Association of Governments (BCAG) to ensure a coordinated approach in the development and implementation of transportation plans throughout the county. This coordination ensures compliance with pertinent provisions of the CAA and California CAA as well as with related transportation legislation.

Air Quality Management Planning

The California CAA requires districts to adopt air quality attainment plans and to review and revise their plans to address deficiencies in interim measures of progress once every three years. The Triennial Air Quality Attainment Plan (AQAP) was created by the air districts in the Northern Sacramento Valley (SVABCC 2025). The purpose of the plan is to achieve and maintain healthy air quality throughout the northern air basin. The plan addresses the progress made in implementing the original plan, submitted to CARB in 1991, and has been updated every three years, most recently in 2024, and was approved by the District Governing Board in April 2025 (SVABCC 2025).

The AQAP includes control strategies necessary to attain the California ozone standard at the earliest practicable date (BCAQMD 2025). Control strategies applicable for development at a local level are listed in Section V.5, District Rules Applicable to New Development, of the 2024 AQAP in the form of rules adopted by each air district in the Northern Sacramento Valley Planning Area. The AQAP notes that BCAQMD has adopted rules for all of the control measures/programs, which include air quality element, smoking vehicle program, wood stoves and fireplaces, backyard residential burning, architectural coating, and fugitive dust during construction.

Applicable Rules

All projects are subject to BCAQMD Rules in effect at the time of activity, including, but not limited to the following:

- **Rule 200, Nuisance:** No person shall discharge from any non-vehicular source such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health or safety of any such persons or the public or which cause or have a natural tendency to cause injury or damage to business or property.

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- **Rule 201, Visible Emissions:** No person shall discharge into the atmosphere from any single non-vehicular source of emission whatsoever any air contaminant, other than uncombined water vapor, for a period or periods aggregating more than three minutes in any one hour which is:
 - As dark or darker in shade as that designated as No. 2 on the Ringelmann Chart as published by the U.S. Bureau of Mines; or,
 - Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in Section 1 of this Rule.
- **Rule 202, Particulate Matter Concentration:** A person shall not discharge into the atmosphere from any source particulate matter in excess of 0.3 grains per cubic foot of gas at standard conditions. When the source involves a combustion process, the concentration must be calculated to 12 percent CO₂. In measuring the combustion contaminants from incinerators used to dispose of combustible refuse by burning, the CO₂ produced by combustion of any liquid or gaseous fuels shall be excluded from the calculation of 12 percent of CO₂.
- **Rule 205, Fugitive Dust Emissions:** The purpose of this rule is to reduce ambient concentrations and limit fugitive emissions of coarse particulate matter (PM₁₀) from construction activities, bulk material handling and storage, carryout and track-out, and similar activities, weed abatement activities, unpaved parking lots, unpaved staging areas, unpaved roads, inactive disturbed land, disturbed open areas, and windblown dust.
- **Rule 207, Wood Burning Devices:** The purpose of this rule is to provide requirements related to sale, installation, operation, and testing of wood-burning stoves in order to minimize air pollutant emissions.
- **Rule 230, Architectural Coatings:** The purpose of this rule is to limit the quantity of VOCs in architectural coatings supplied, sold, offered for sale, applied, solicited for application, or manufactured for use within the BCAQMD.
- **Rule 400, Permit Requirements:** The purpose of this rule is to require any person constructing, altering, or operating a source that emits or may emit air contaminants to request an Authority to Construct or Permit to Operate from the Air Pollution Control Officer and to provide an orderly procedure for application, review, and authorization of new sources and of the modification and operation of existing sources of air pollution. Stationary sources that are subject to Rule 1101—Title V-Federal Operating Permits—of these Rules and Regulations shall also comply with the procedures specified in this rule.
- **Rule 430, State New Source Review:** The purpose of this rule is to establish pre-construction review requirements for new and modified stationary sources of air pollution for use of Best Available Control Technology, offsets, and analysis of air quality impacts and to ensure that the operation of such sources does not interfere with the attainment or

maintenance of ambient air quality standards and complies with all other applicable BCAQMD Rules and Regulations.

- **Rule 432, Federal New Source Review:** The purpose of this Rule is to establish pre-construction review requirements for new and modified major stationary sources and major modifications of air pollution for use of Best Available Control Technology, offsets, and analysis of air quality impacts, and to ensure that the operation of such sources does not interfere with the attainment or maintenance of ambient air quality standards and complies with all other applicable requirements.

Naturally Occurring Asbestos

Naturally occurring asbestos may be found in at least 44 of California's 58 counties, including Butte County. Asbestos is a naturally occurring fiber which is commonly found in ultramafic rock. The asbestos fibers are released into the air when they are broken or crushed through man-made or natural processes. Asbestos has been identified by the State as a toxic air contaminant. Inhalation (breathing) is the main route of exposure and may cause lung cancer or cause other health hazards which may not become apparent until after many years (BCAQMD 2026a).

Naturally occurring asbestos, often found in serpentine rock formations, is present in foothill areas of Butte County. BCAQMD implements the requirements of State's Airborne Toxic Control Measures for naturally-occurring asbestos. If naturally occurring asbestos is discovered prior to or when performing cleanup activities, owners/contractors must notify the BCAQMD by the next business day and implement dust mitigation measures within 24-hours. The following dust control measures are required during any construction or grading activities subject to the State's Airborne Toxic Control Measures for asbestos, regardless of work area size:

- Construction vehicle speeds at the work site must be 15 miles per hour or less.
- Prior to any ground disturbance and during work activities, sufficient water must be applied to the area to be disturbed to prevent visible dust from crossing the property line.
- Storage piles must be kept adequately wetted, treated with a chemical dust suppressant, or covered when material is not being added to or removed from the pile.
- Equipment must be washed down before moving from the property onto a paved public road.
- Visible track-out on the paved public road must be cleaned using wet sweeping or a HEPA filter equipped vacuum device within 24 hours.

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3.3.2 Existing Conditions

AIR POLLUTANTS OF CONCERN

Criteria Air Pollutants

The pollutants emitted into the ambient air by stationary and mobile sources are categorized as primary and/or secondary pollutants. Primary air pollutants are emitted directly from sources. Carbon monoxide (CO), reactive organic gases (ROG), nitrogen oxides (NO_x), sulfur dioxide (SO₂), coarse inhalable particulate matter (PM₁₀), fine inhalable particulate matter (PM_{2.5}), and lead (Pb) are primary air pollutants. Of these, CO, SO₂, NO₂, PM₁₀, and PM_{2.5} are “criteria air pollutants,” which means that AAQS have been established for them. ROG and NO_x are criteria pollutant precursors that form secondary criteria air pollutants through chemical and photochemical reactions in the atmosphere. Ozone (O₃) and nitrogen dioxide (NO₂) are the principal secondary pollutants. Table 3.3-2, *Criteria Air Pollutant Health Effects Summary*, summarizes the potential health effects associated with the criteria air pollutants.

Table 3.3-2 Criteria Air Pollutant Health Effects Summary

Pollutant	Health Effects	Examples of Sources
Carbon Monoxide (CO)	▪ Chest pain in heart patients ▪ Headaches, nausea ▪ Reduced mental alertness ▪ Death at very high levels	Any source that burns fuel such as cars, trucks, construction and farming equipment, and residential heaters and stoves
Ozone (O ₃)	▪ Cough, chest tightness ▪ Difficulty taking a deep breath ▪ Worsened asthma symptoms ▪ Lung inflammation	Atmospheric reaction of organic gases with nitrogen oxides in sunlight
Nitrogen Dioxide (NO ₂)	▪ Increased response to allergens ▪ Aggravation of respiratory illness	Same as carbon monoxide sources
Particulate Matter (PM ₁₀ and PM _{2.5})	▪ Hospitalizations for worsened heart diseases ▪ Emergency room visits for asthma ▪ Premature death	Cars and trucks (particularly diesel) Fireplaces and woodstoves Windblown dust from overlays, agriculture, and construction
Sulfur Dioxide (SO ₂)	▪ Aggravation of respiratory disease (e.g., asthma and emphysema) ▪ Reduced lung function	Combustion of sulfur-containing fossil fuels, smelting of sulfur-bearing metal ores, and industrial processes
Lead (Pb)	▪ Behavioral and learning disabilities in children ▪ Nervous system impairment	Contaminated soil

Source: CARB 206a.

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A description of each of the primary and secondary criteria air pollutants and their known health effects is presented below.

- **Carbon Monoxide (CO)** is a colorless, odorless gas produced by incomplete combustion of carbon substances, such as gasoline or diesel fuel. CO is a primary criteria air pollutant. CO concentrations tend to be the highest during winter mornings with little to no wind, when surface-based inversions trap the pollutant at ground levels. The highest ambient CO concentrations are generally found near traffic congested corridors and intersections. The primary adverse health effect associated with CO is interference with normal oxygen transfer to the blood, which may result in tissue oxygen deprivation (CARB 2026a).
- **Volatile Organic Compounds (VOC)** are composed primarily of hydrogen and carbon atoms. Internal combustion associated with motor vehicle usage is the major source of VOCs. Other sources include evaporative emissions from paints and solvents, asphalt paving, and household consumer products such as aerosols. There are no AAQS for VOCs, meaning that no health-based criteria established by the EPA or CARB. However, because they contribute to the formation of O₃, the BCAQMD has established a significance threshold for this pollutant (CARB 2026a).
- **Nitrogen Oxides (NO_x)** are a by-product of fuel combustion and contribute to the formation of ground-level O₃, PM₁₀, and PM_{2.5}. The two major forms of NO_x are nitric oxide (NO) and nitrogen dioxide (NO₂). NO is a colorless, odorless gas formed from atmospheric nitrogen and oxygen when combustion takes place under high temperature and/or high pressure. The principal form of NO_x produced by combustion is NO, but NO reacts quickly with oxygen to form NO₂, creating the mixture of NO and NO₂ commonly called NO_x. NO₂ is an acute irritant and more injurious than NO in equal concentrations. At atmospheric concentrations, however, NO₂ is only potentially irritating. NO₂ absorbs blue light; the result is a brownish-red cast to the atmosphere and reduced visibility. NO₂ exposure concentrations near roadways are of particular concern for susceptible individuals, including asthmatics, children, and the elderly. Current scientific evidence links short-term NO₂ exposures, ranging from 30 minutes to 24 hours, with adverse respiratory effects, including airway inflammation in healthy people and increased respiratory symptoms in people with asthma. Also, studies show a connection between elevated short-term NO₂ concentrations and increased visits to emergency departments and hospital admissions for respiratory issues, especially asthma (CARB 2026a).
- **Sulfur Dioxide (SO₂)** is a colorless, pungent, irritating gas formed by the combustion of sulfurous fossil fuels. It enters the atmosphere as a result of burning high-sulfur-content fuel oils and coal and chemical processes at plants and refineries. Gasoline and natural gas have very low sulfur content and do not release significant quantities of SO₂. When sulfur dioxide forms sulfates (SO₄) in the atmosphere, together these pollutants are referred to as sulfur oxides (SO_x). Thus, SO₂ is both a primary and secondary criteria air pollutant. At sufficiently

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high concentrations, SO₂ may irritate the upper respiratory tract. Current scientific evidence links short-term exposures to SO₂, ranging from 5 minutes to 24 hours, with an array of adverse respiratory effects, including bronchoconstriction and increased asthma symptoms. These effects are particularly adverse for asthmatics at elevated ventilation rates (e.g., while exercising or playing) at lower concentrations and when combined with particulates, SO₂ may do greater harm by injuring lung tissue. Studies also show a connection between short-term exposure and increased visits to emergency facilities and hospital admissions for respiratory illnesses, particularly in at-risk populations such as children, the elderly, and asthmatics (CARB 2026a).

- **Suspended Particulate Matter (PM₁₀ and PM_{2.5})** consists of finely divided solids or liquids such as soot, dust, aerosols, fumes, and mists. Two forms of fine particulates are now recognized and regulated. Inhalable coarse particles, or PM₁₀, include particulate matter with an aerodynamic diameter of 10 microns or less (i.e., ≤10 millionths of a meter or 0.0004 inch). Inhalable fine particles, or PM_{2.5}, have an aerodynamic diameter of 2.5 microns or less (i.e., ≤2.5 millionths of a meter or 0.0001 inch). Particulate discharge into the atmosphere results primarily from industrial, agricultural, construction, and transportation activities. Both PM₁₀ and PM_{2.5} may adversely affect the human respiratory system, especially in people who are naturally sensitive or susceptible to breathing problems. The US EPA's scientific review concluded that PM_{2.5}, which penetrates deeply into the lungs, is more likely than PM₁₀ to contribute to health effects and at far lower concentrations. These health effects include premature death in people with heart or lung disease, nonfatal heart attacks, irregular heartbeat, aggravated asthma, decreased lung function, and increased respiratory symptoms (e.g., irritation of the airways, coughing, or difficulty breathing). There has been emerging evidence that ultrafine particulates, which are even smaller particulates with an aerodynamic diameter of <0.1 microns or less (i.e., ≤0.1 millionths of a meter or <0.000004 inch), have human health implications, because their toxic components may initiate or facilitate biological processes that may lead to adverse effects to the heart, lungs, and other organs (CARB 2026a).
- **Ozone (O₃)** is a key ingredient of "smog" and is a gas that is formed when VOCs and NO_x, both by-products of internal combustion engine exhaust, undergo photochemical reactions in sunlight. O₃ is a secondary criteria air pollutant. O₃ concentrations are generally highest during the summer months when direct sunlight, light winds, and warm temperatures create favorable conditions for its formation. O₃ poses a health threat to those who already suffer from respiratory diseases as well as to healthy people. Breathing O₃ can trigger a variety of health problems, including chest pain, coughing, throat irritation, and congestion. It can worsen bronchitis, emphysema, and asthma. Ground-level O₃ also can reduce lung function and inflame the linings of the lungs. Repeated exposure may permanently scar lung tissue. O₃ also affects sensitive vegetation and ecosystems, including forests, parks, wildlife refuges, and wilderness areas (CARB 2026a).

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- **Lead (Pb)** is a metal found naturally in the environment as well as in manufactured products. Once taken into the body, lead distributes throughout the body in the blood and accumulates in the bones. Depending on the level of exposure, lead can adversely affect the nervous system, kidney function, immune system, reproductive and developmental systems, and the cardiovascular system. Lead exposure also affects the oxygen-carrying capacity of the blood. The effects of lead most commonly encountered in current populations are neurological effects in children and cardiovascular effects in adults (e.g., high blood pressure and heart disease). Infants and young children are especially sensitive to even low levels of lead, which may contribute to behavioral problems, learning deficits, and lowered IQ (CARB 2026a). Because emissions of lead are found only in projects that are permitted by BCAQMD, lead is not an air quality of concern for the proposed project.

TOXIC AIR CONTAMINANTS

People exposed to TACs at sufficient concentrations and durations may have an increased chance of getting cancer or experiencing other serious health effects. These health effects can include damage to the immune system as well as neurological, reproductive (e.g., reduced fertility), developmental, respiratory, and other health problems (USEPA 2025a). By the last update to the TAC list in December 1999, CARB had designated 244 compounds as TACs (CARB 1999). Additionally, CARB has implemented control measures for several compounds that pose high risks and show potential for effective control. There are no air quality standards for TACs. Instead, TAC impacts are evaluated by calculating the health risks associated with a given exposure. Most of the estimated health risks from TACs can be attributed to relatively few compounds, the most relevant to the proposed project being particulate matter from diesel-fueled engines.

Diesel Particulate Matter

In 1998, CARB identified diesel particulate matter (DPM) as a TAC. Previously, the individual chemical compounds in diesel exhaust were considered TACs. Almost all diesel exhaust particles are 10 microns or less in diameter. Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lungs. Long-term (chronic) inhalation of DPM is likely a lung cancer risk. Short-term (i.e., acute) exposure can cause irritation and inflammatory symptoms and may exacerbate existing allergies and asthma symptoms (USEPA 2002).

Asbestos

Asbestos is another TAC and federal hazardous air pollutant of concern during construction and renovation. Asbestos is the common name for a group of naturally occurring fibrous minerals that can separate into thin, inhalable fibers. Asbestos found in many parts of California and its emissions present a significant risk to human health on a Statewide and local level. When rock containing asbestos is broken or crushed, asbestos fibers may be released and become

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airborne. While there are many different types of asbestos, all forms of asbestos are harmful to human health. Asbestos has been known to cause lung cancer and mesothelioma, a cancer of the lining of lung tissue that is nearly always fatal (USEPA 2026). Since asbestos is naturally occurring in rock structures it is a concern during construction and mining operations when it has the potential to be present. Because of its properties (fiber strength and heat resistance) asbestos has been used in a variety of building construction materials as insulation and as a fire retardant.

It historically was used in roofing shingles, ceiling, and floor tiles. It is only a health concern when asbestos-containing material is disturbed or damaged in some way, releasing the particles and inhalable fibers into the air. Exposure to asbestos can occur during demolition or remodeling of buildings that were constructed prior to the 1977 ban on asbestos for use in buildings. Exposure to naturally occurring asbestos can occur during soil-disturbing activities in areas with deposits present. According to BCAQMD's map of naturally occurring asbestos, no areas in the Town of Paradise cover deposits of naturally occurring asbestos (BCAQMD 2018). However, if naturally occurring asbestos is found on-site during ground-disturbing activities, the proposed project would be subject to BCAQMD's dust control requirements.

SACRAMENTO VALLEY AIR BASIN

CARB has delineated the jurisdiction of regional air basins and local air districts throughout the state. The Town of Paradise is in the Sacramento Valley Air Basin (SVAB), which is the northern half of California's 400-mile-long Central Valley. The SVAB encompasses approximately 14,994 square miles with a largely flat valley floor (excepting the Sutter Buttes); is about 200 miles long and up to 150 miles wide; and is bordered on its east by the Sierra Nevada, on the north by the Cascade range, and on the west by the Coast range (NSVPA 2025). The SVAB contains 11 counties and some 2 million people and is divided into two air quality planning areas based on the amount of pollutant transport from one area to the other and the level of emissions within each. Paradise is in the Northern Sacramento Valley Air Basin (NSVAB) of the SVAB. The NSVAB is composed of Butte, Colusa, Glenn, Shasta, Sutter, Tehama, and Yuba Counties.

Emissions from the urbanized portion of the basin (Sacramento, Yolo, Solano, and Placer Counties) dominate the emissions inventory for the SVAB, and on-road motor vehicles are the primary source of emissions in the Sacramento metropolitan area. Though pollutant concentrations have generally declined over the years, additional emission reductions will be needed to attain the State and national ambient air quality standards in the SVAB (NSVPA 2025). Air pollutants are not confined by jurisdictional boundaries but disperse through the atmosphere. For example, depending on the time of year and meteorological conditions, a significant share of Paradise's air pollutants may come from the Sacramento metropolitan area, which, in turn, may receive a share of its air pollutants from the San Francisco Bay Area or the San Joaquin Valley.

Regional Climate and Meteorology

Seasonal weather patterns have a significant effect on regional and local air quality. The Sacramento Valley and Paradise have a Mediterranean climate, characterized by hot, dry summers and cool, wet winters. Winter weather is governed by cyclonic storms from the North Pacific, and summer weather is typically subject to a high-pressure cell that deflects storms from the region.

In Paradise, winters are generally mild, with daytime average temperatures in the low 50s and nighttime temperatures in the upper 30s. Temperatures range from an average January low of approximately 35°F to an average July high of approximately 91°F, although periodic lower and higher temperatures are common. Rainfall between October and May averages about 58 inches but varies considerably year by year (WeatherSpark 2026). Heavy snowfall is common in the northeastern, mountainous portion of Butte County. Periodic rainstorms contrast with occasional stagnant weather and thick ground or “tule” fog in the moister, flatter parts of the valley. Winter winds generally blow from the south, although north winds also blow.

Diminished air quality in Butte County largely results from local air pollution sources, transport of pollutants into the area from the south, the NSVAB topography, prevailing wind patterns, and certain inversion conditions that differ with the season. During the summer, sinking air forms a “lid” over the region, confining pollution within a shallow layer near the ground that leads to photochemical smog and visibility problems. During winter nights, air near the ground cools while the air above remains relatively warm, resulting in little air movement and localized pollution “hot spots” near emission sources. Carbon monoxide, nitrogen oxides, particulate matters, and lead particulate concentrations tend to elevate during winter inversion conditions when little air movement may persist for weeks.

As a result, high levels of particulate matter (primarily PM_{2.5}) and ground-level ozone are the pollutants of most concern to the NSVAB Districts. Ground-level ozone, the principal component of smog, forms when VOC and NO_x—together known as ozone precursor pollutants—react in strong sunlight. Ozone levels tend to be highest in Butte County during late spring through early fall, when sunlight is strong and constant and emissions of the precursor pollutants are highest (NSVPA 2025).

ATTAINMENT STATUS

The AQAP provides the framework for air quality basins to achieve attainment of the State and federal AAQS through the State Implementation Plan. Areas that meet AAQS are classified as attainment areas, and areas that do not meet these standards are classified as nonattainment areas. Severity classifications for O₃ range from marginal, moderate, and serious, to severe and extreme.

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- **Unclassified.** A pollutant is designated unclassified if the data are incomplete and do not support a designation of attainment or nonattainment.
- **Attainment.** A pollutant is in attainment if the AAQS for that pollutant was not violated at any site in the area during a three-year period.
- **Nonattainment.** A pollutant is in nonattainment if there was at least one violation of an AAQS for that pollutant in the area.
- **Nonattainment/Transitional.** A subcategory of the nonattainment designation. An area is designated nonattainment/transitional to signify that the area is close to attaining the AAQS for that pollutant.

The attainment status for Butte County is shown in Table 3.3-3, *Attainment Status of Criteria Pollutants in Butte County*. Butte County is currently designated as a nonattainment-transitional area for California O₃ and nonattainment area for California PM₁₀ AAQS.

Table 3.3-3 Attainment Status of Criteria Pollutants in Butte County

Pollutant	State	Federal
Ozone – 1-hour	Nonattainment-Transitional	--
Ozone – 8-hour	Nonattainment-Transitional	Nonattainment ¹
24-Hour PM ₁₀	Nonattainment	Attainment
Annual PM ₁₀	Attainment	--
24-Hour PM _{2.5}	--	Attainment
Annual PM _{2.5}	Attainment	Attainment
CO	Attainment	Attainment
NO ₂	Attainment	Attainment
SO ₂	Attainment	Attainment
Lead	Attainment	Attainment

Source: BCAQMD 2026b; CARB 2026b

Note: -- no existing standard. The federal 1-hour Ozone standard was revoked in 2005.

1. Butte County was officially designated nonattainment for the 2015 federal ozone standard in 2018 by the U. S. EPA. August 2021 was the deadline for marginal areas to attain the 2015 federal ozone standard. The EPA took final action in October 2022 to determine that Butte County met the 2015 federal ozone standard by the required deadline. Until further Clean Air Act requirements are met, Butte County still remains classified as nonattainment for the federal ozone standard.

EXISTING AMBIENT AIR QUALITY

CARB, in cooperation with BCAQMD and other air districts, monitors air quality throughout the SVAB. In Butte County, CARB monitors air quality at the following stations: Chico (East Avenue);

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Paradise (4405 Airport Road and Paradise-Clark); and Gridley (Cowee Avenue). Paradise-Clark monitoring site, the closest monitoring station to the project site, has data for ozone and PM_{2.5} for years 2023 and 2024, and the Paradise 4405 Airport Road site has data for ozone for 2022. The Chico East Avenue site has data for ozone, CO, NO₂, and PM for the last three years. Data from these three monitoring stations are shown in Table 3.3-4, *Ambient Air Quality Monitoring Summary*, for the last three available years.

Table 3.3-4 Ambient Air Quality Monitoring Summary

Pollutant/Standard ^{1,2}	Number of Days Thresholds Were Exceeded and Maximum Levels During Such Violations		
	2022	2023	2024
Ozone (O₃)			
State 1-Hour $\geq$ 0.09 ppm (days exceed threshold)	0	0	0
State & Federal 8-hour $\geq$ 0.07 ppm (days exceed threshold)	0	0	0
Maximum 1-Hour Conc. (ppm)	0.082	0.071	0.070
Maximum 8-Hour Conc. (ppm)	0.067	0.068	0.066
Nitrogen Dioxide (NO₂)			
State 1-Hour $\geq$ 0.18 ppm (days exceed threshold)	0	0	0
Maximum 1-Hour Conc (ppm)	0.0296	0.0314	0.0319
Coarse Particulates (PM₁₀)			
State 24-Hour $>$ 50 $\mu\text{g}/\text{m}^3$ (days exceed threshold)	10	16	13
Federal 24-Hour $>$ 150 $\mu\text{g}/\text{m}^3$ (days exceed threshold)	0	0	0
Max. 24-Hour Conc. ($\mu\text{g}/\text{m}^3$)	74.0	78.5	109.9
Fine Particulates (PM_{2.5})			
Federal 24-Hour $>$ 35 $\mu\text{g}/\text{m}^3$ (days exceed threshold)	2	0	0
Maximum 24-Hour Conc. ($\mu\text{g}/\text{m}^3$)	42.8	22.1	24.1

Source: CARB 2025c.

Notes: ppm = parts per million; ppb = parts per billion; $\mu\text{g}/\text{m}^3$ = micrograms per cubic meter; * = insufficient data

1. Data for O₃ and PM_{2.5} in years 2023-2024 was obtained from the Paradise-Clark Monitoring Station; data for O₃ in year 2022 was obtained from the Paradise 4405 Airport Road Monitoring Station; and data for PM_{2.5} in year 2022 and data for NO₂ and PM₁₀ in all three years was obtained from the Chico East Avenue Monitoring Station.
2. Latest available data as of February 2026.

SENSITIVE RECEPTORS

Some land uses are considered more sensitive to air pollution than others due to the types of population groups or activities involved. Sensitive population groups for the purposes of air

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quality analysis include children, the elderly, the acutely ill, and the chronically ill, especially those with cardiorespiratory diseases.

Residential areas are also considered sensitive receptors to air pollution because residents (including children and the elderly) tend to be at home for extended periods of time, resulting in sustained exposure to any pollutants present. Other sensitive receptors for the purposes of air quality analysis can include retirement facilities, hospitals, and schools. Recreational land uses are considered moderately sensitive to air pollution. Although exposure periods are generally short, exercise places a high demand on respiratory functions, which can be impaired by air pollution. In addition, noticeable air pollution can detract from the enjoyment of recreation. Industrial, commercial, retail, and office areas are considered the least sensitive to air pollution. Exposure periods are relatively short and intermittent since the majority of the workers tend to stay indoors most of the time. In addition, the working population is generally the healthiest segment of the population. Sensitive receptors near the project site include single-family residences west of the project site fronting Elliot Road and students at Paradise High School north of the project site. The distances of these receptors to the project site shown in Table 3.3-5, *Sensitive Receptor Distances*.

Table 3.3-5 Sensitive Receptor Locations

Receptor	Direction	Distance (closest) ¹
Single-family residences on Elliot Road	West	Adjacent to western project site boundary
Paradise High School	North	Adjacent to northern project site boundary
Multi-family residences Camino Lane	Southwest	205 feet
Single-family residences on Jaguar Court	East	200 feet
Multi-family residences on Greenthumb Lane	Southeast	220 feet
Ridgeview High School	Northeast	540 feet
Single-family residence off of Pleasant Lane	Northeast	670 feet

1. Indicates the approximate distance to the nearest structure in each group of receptors. Distances were measured with Google Earth.

3.3.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, “Environmental Checklist Form,” of the California Environmental Quality Act (CEQA) Guidelines states that, “Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the

following determinations.” The proposed project would result in a significant air quality impact if it would:

- a) Conflict with or obstruct implementation of the applicable air quality plan.
- b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.
- c) Expose sensitive receptors to substantial pollutant concentrations.
- d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

THRESHOLD GUIDANCE

The analysis of the project’s air quality impacts follows the guidance and methodologies and utilizes the significance thresholds in the BCAQMD *CEQA Air Quality Handbook* (Handbook), last updated in 2024 (BCAQMD 2024). As described in Section 4.3 of the Handbook, BCAQMD has established screening criteria to determine whether additional modeling for criteria air pollutants is necessary for a project. However, even if a project meets the screening criteria listed in Tale 4-1 of the Handbook, BCAQMD recommends that construction modeling and quantification still be performed if a project includes any of the following:

- Significant material transport involving a considerable amount of hauling (e.g., greater than 10,000 cubic yards).
- Grading in contaminated soils or in areas with suspected or known naturally occurring asbestos.
- Simultaneous construction of more than one land use type (not applicable to high density infill development).
- Only a construction phase; that is, the project has no operational land use component (for example, a road construction or levee project).
- Preparation of an environmental impact report (EIR). (BCAQMD 2024)

Because the proposed project requires preparation of an EIR, construction emissions have been quantified for the proposed project and are used to analyze impacts in accordance with the following thresholds and guidance.

Air Quality Attainment Plan Consistency

The BCAQMD Handbook notes that, in general, a project conflicts with or obstructs implementation of the applicable attainment plan if it would result in or induce growth in population, employment, land use, or regional vehicle miles traveled (VMT) that is inconsistent

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with the growth (and therefore the emission projection) assumptions in the applicable attainment plan. BCAQMD identifies the most recent NSVPA AQAP as the applicable attainment plan to be referenced in a project's AQAP consistency analysis. BCAQMD also notes that lead agencies should discuss consistency with BCAQMD rules that have been adopted to help meet the attainment goals of the AQAP. These rules include Rule 205 (Fugitive Dust Emissions), Rule 230 (Architectural Coatings), and Rule 430 (State New Source Review) (BCAQMD 2024).

Regional Significance Thresholds

The Handbook established the regional significance thresholds for operation and construction shown in Table 3.3-6, *BCAQMD Regional Significance Thresholds*. Per the Handbook, the significance thresholds are derived from District Rule 430, which in turn is based on the State ambient air quality standards. Projects that do not exceed the regional significance thresholds may be assumed to have a less than significant impact in regard to a cumulatively considerable net increase of any criteria pollutant for which the region is nonattainment (BCAQMD 2024).

Table 3.3-6 BCAQMD Regional Significance Thresholds

Pollutant	Construction		Operational
	Maximum Daily Emissions (lbs./day)	Annual Emissions (tons/year)	Maximum Daily Emissions (lbs./day)
Reactive Organic Gases (ROG)	137	4.5	25
Nitrogen Oxides (NO _x)	137	4.5	25
Particulates (PM ₁₀)	80	n/a	80

Source: BCAQMD 2024.

If projects exceed the emissions in Table 3.3-6, these emissions would cumulatively contribute to the nonattainment status and would contribute to elevating health effects associated with these criteria air pollutants. However, for projects that exceed the emissions in Table 3.3-6, it is speculative to determine how exceeding the regional thresholds would affect the number of days the region is in nonattainment since mass emissions are not correlated with concentrations of emissions or how many additional individuals in the air basin would be affected by the health effects cited above. The BCAQMD is the primary agency responsible for ensuring the health and welfare of sensitive individuals to elevated concentrations of air quality in its jurisdiction within SVAB, and at the present time, it has not provided methodology to assess the specific correlation between mass emissions generated and the effect on health in order to address the issue raised in *Sierra Club v. County of Fresno (Friant Ranch, L.P.)* (2018) 6 Cal.5th 502, Case No. S21978 (*Friant Ranch*).

Ozone concentrations depend on a variety of complex factors, including the presence of sunlight and precursor pollutants, natural topography, nearby structures that cause building

downwash, atmospheric stability, and wind patterns. Because of the complexities of predicting ground-level ozone concentrations in relation to the National and California AAQS, it is not possible to link health risks to the magnitude of emissions exceeding the significance thresholds. To achieve the health-based standards established by the EPA, the air districts prepare air quality management plans that detail regional programs to attain the AAQS. However, if a project in Butte County exceeds the regional significance thresholds, the project could contribute to an increase in health effects in the basin until the attainment standards are met in the SVAB.

Localized Air Quality Impact Thresholds

To address localized air quality impacts, BCAQMD recommends that a project's environmental document present a map using aerial satellite imagery that shows the whole of the project (that is, its total footprint, components and phases) and any residences, hospitals, nursing homes, day care centers, schools, churches, or other structures or land uses indicating a possible sensitive receptor within 1,000 feet of the project parcel(s). Roads, commercial, and industrial facilities should also be indicated to provide a visual sense of existing emitters of air pollutants in the area. Potential sensitive receptors within 1,000 feet of the project parcel(s) should be identified on the map and their distance from the project provided in a table (BCAQMD 2024). Distances to potential receptors from the project site are shown in Table 3.3-5.

Health Risk

BCAQMD recommends the evaluation of a project's emissions of DPM and PM_{2.5} using the 2009 California Air Pollution Control Officers Association's (CAPCOA) *Health Risk Assessments for Proposed Land Use Projects* guidelines. This document differentiates between Type A and B land use projects by their potential to cause long-term public health risk impacts. Type A land use projects involve new facilities or facility activities that emit TACs with potential to impact receptors. For Type A projects, BCAQMD directs lead agency to evaluate:

- The extent to which the new source would increase risk levels, hazard index, and/or PM_{2.5} concentrations at nearby receptors
- Whether or not the source should be permitted by the District (as a stationary source)
- Whether the project should implement Best Available Control Technology for Toxics (TBACT), as determined by the District. (BCAQMD 2024)

Type B land use projects are residential, commercial, and institutional developments that will place receptors in the vicinity of an existing TAC source: for example, a residential subdivision within a certain distance of a freeway interchange or a rendering plant. If a project will provide a place for people to live, recreate, learn, or convalesce, BCAQMD recommends that it be considered a receptor in the context of an existing TAC source. In 2015, the California Supreme Court ruled that lead agencies are not required by CEQA to analyze the impact of the existing

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environmental conditions on a project's future users for a Type B project (California Building Industry Association v. Bay Area Air Quality Management District). Therefore, BCAQMD recognizes that it is the lead agency's discretion to determine whether a Type B project shall be required to prepare a health risk assessment (BCAQMD 2024).

The BCAQMD recommends the use of the following health risk impact significance thresholds for TACs and PM_{2.5} generated from project-related construction and operational phase activities to determine project-level health risk impacts:

- An excess cancer risk level of more than 10 in one million, or a noncancer (i.e., chronic or acute) hazard index greater than 1.0 would be a significant project contribution.
- An incremental increase of greater than 0.8 micrograms per cubic meter (µg/m³) annual average PM_{2.5} from a single source would be a significant project contribution (BCAQMD 2024).

Additionally, BCAQMD notes that a project would have a cumulatively considerable impact if the aggregate total of all past, present, and foreseeable future sources within a 1,000-foot radius from the fence line of a source or location of a receptor, plus the contribution from the project, exceeds any of the following:

- An excess cancer risk level of more than 10 in one million or a chronic noncancer hazard index (from all local sources) greater than 1.0.
- 0.3 µg/m³ annual average PM_{2.5} (BCAQMD 2024).

CO Hotspots

Congested intersections have the potential to create elevated concentrations of CO, referred to as CO hotspots. The significance criteria for CO hotspots are based on the California AAQS for CO, which are 9.0 ppm (8-hour average) and 20.0 ppm (1-hour average). With the turnover of older vehicles, the introduction of cleaner fuels, and implementation of control technology, CO concentrations in the SVAB have steadily declined. The SVAB was designated as attainment for CO under both the California AAQS in 1997 and National AAQS in 1998 (BCAQMD 2026b). BCAMQD has not adopted thresholds or screening criteria related to determining whether a project may have the potential to generate a CO hotspot. According to Bay Area Air District, under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection to more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited—in order to generate a significant CO impact (Bay Area Air District 2023).

Odors

BCAQMD recommends that projects discuss any potential odor emitted by the project including, but not limited to, heavy equipment exhaust. A potential odor impact can occur

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under two different circumstances: the proposed project would: 1) generate odors that could adversely affect a substantial number of persons in the project vicinity; or 2) locate receptors where they would be affected by an existing odor source. In either circumstance, the discussion should include the lead agency's assessment as to the nature of the odor, its source and dispersal characteristics, noxiousness and anticipated intensity with distance, and surrounding land uses and receptors within 1,000 feet of the project parcel(s).

BCAQMD notes that the following land uses have potential to generate nuisance odors. The buffer distances needed for odors of these land uses to disperse are shown in parentheses (BCAQMD 2024).

- Wastewater Treatment Plant (2 miles)
- Wastewater Pumping Facilities (1 mile)
- Sanitary Landfill (1 mile)
- Transfer Station (1 mile)
- Composting Facility (2 miles)
- Petroleum Refinery (2 miles)
- Asphalt Batch Plant (2 miles)
- Chemical Manufacturing (1 mile)
- Fiberglass Manufacturing (1 mile)
- Painting/Coating Operations (1 mile)
- Rendering Plant (4 miles)
- Coffee Roaster (1 mile)
- Food Processing Facility (1 mile)
- Feed Lot/ Dairy (1 mile)
- Green Waste and Recycling Operations (2 miles)
- Metal Smelting Plants (1 mile)

METHODOLOGY

This air quality evaluation was prepared in accordance with the requirements of CEQA to determine if significant air quality impacts are likely to occur with the proposed project. BCAQMD has published guidelines that provide local governments with guidance for analyzing and mitigating air quality impacts. Where guidance is not provided by BCAQMD, guidance from the Sac Metro AQMD was borrowed for the following analysis.

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Emissions Modeling

The proposed project criteria air pollutant emissions inventory was modeled using the California Emissions Estimator Model (CalEEMod), version 2022.1, for both construction and operational activities.

Construction

The project-related construction emissions are based on information provided by the District and CalEEMod defaults. Construction of the proposed project are anticipated to occur five days a week and would disturb approximately 7.31 acres across the project site. Construction activities were modeled based on two phases of work. The agricultural building would be constructed between winter 2026 and summer 2027, and these activities were modeled for December 2026 through September 2027 (referred to as Phase 1). Construction associated with the parking lot and stadium/practice field would start in 2030, and these components would be operational in 2031. For the purposes of this model, construction activities for this phase were assumed from January 2030 to January 2031 (referred to as Phase 2). The following construction activities and assumptions are reflected in the modeling. Additional information about project assumptions and modeling inputs are detailed in Appendix B:

- **Demolition.** An estimated 69,496 square feet of asphalt pavement at the project site would be demolished and hauled from the site over the two phases of work. This would result in 1,668 tons of debris; for the purposes of this model, half of this quantity is assumed to be removed from the site during Phase 1 and the other half during Phase 2. Equipment use and activity durations for demolition were modeled using CalEEMod defaults. Equipment used in the modeling includes concrete/industrial saws, excavators, and dozers. Demolition activities were modeled to occur over 17 days in Phase 1 and 21 days in Phase 2.
- **Site Preparation and Grading.** Site preparation and grading activities would take place across the 7.31-acre project site during both phases of work. These activities would consist of the removal of existing vegetation and excavation and removal of soil to prepare for the installation of new utility connections at the project site. As a result, 5,000 cubic yards of soil hauling were accounted for in the model to represent the maximum quantity of soil export during these activities. Based on CalEEMod defaults, between one to two acres of the project site per day would be disturbed during Phase 1, and between 2.5 to 3.5 acres per day would be disturbed during Phase 2. Additionally, fugitive dust best practices (see below) to comply with BCAQMD Rule 205 were incorporated into the modeling calculations of the site preparation and grading phases, as directed in the Handbook.
- **Facilities.** As discussed in detail in Chapter 2, *Project Description*, the proposed project would result in the construction of an agricultural building on the western portion of the project site, a stadium/practice field on the eastern portion of the project site, and a parking lot on the center portion of the project site between the other uses. For the purposes of this model, 2.46 acres of non-asphalt surfaces, 1.34 acres of non-parking asphalt surfaces, 1.97

acres of parking lot surfaces, and 1.5 acres of landscaping and natural turf were included in the model, in addition to the 1,728-square foot agricultural building. CalEEMod defaults were used for inputs related to the architectural coating and paving activities.

- **Equipment.** CalEEMod defaults were used for all equipment inputs. The types of equipment, number of equipment, and hours of use per day, in addition to construction worker, vendor, hauling, and water truck trips, are detailed in Appendix B.

Operation

The proposed project is anticipated to be fully operational by 2031; however, operation of the agricultural building would begin after its completion in summer 2027. The proposed project would not result in an increase in new trips to the project site. Therefore, no mobile emissions were calculated for the proposed project. No natural gas infrastructure would be installed to support operation of the proposed project; however, electricity would be used for parking lot and security lighting at the proposed facilities. Area sources generated from use of consumer products and cleaning supplies are based on CalEEMod default emission rates and on the assumed building square footage.

Best Practices

Appendix C of the BCAQMD Handbook lists best practices to minimize air quality and GHG impacts. BCAQMD notes that these best practices should be incorporated as project commitments for all applicable projects.

Diesel PM Exhaust from Construction Equipment

- All on- and off-road diesel equipment shall not idle for more than five minutes. Signs shall be posted in the designated queuing areas and/or job sites to remind drivers and operators of the five-minute idling limit.
- Idling, staging, and queuing of diesel equipment within 1,000 feet of sensitive receptors is prohibited.
- All construction equipment shall be maintained in proper tune according to the manufacturer's specifications. Equipment must be checked by a certified mechanic and determined to be running in proper condition before the start of work.
- Implement CARB-verified diesel emission control strategies as needed to comply with the State In-Use Off-Road Regulation and Truck and Bus Regulation.
- To the extent feasible, truck trips shall be scheduled during non-peak hours to reduce peak hour emissions.

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- Proposed truck routes should be evaluated to define routing patterns with the least impact to residential communities and sensitive receptors and identify these receptors in the truck route map.

Diesel Idling Restrictions for Construction Phases

Idling Restrictions for On-Road Vehicles

Section 2485 of Title 13 California Code of Regulations applies to California- and non-California-based, diesel-fueled commercial motor vehicles operating in the state with gross vehicular weight ratings of greater than 10,000 pounds and licensed for operation on highways. In general, the regulation specifies that drivers of said vehicles:

- Shall not idle the vehicle's primary diesel engine for greater than 5 minutes at any location, except as noted in Subsection (d) of the regulation; and,
- Shall not operate a diesel-fueled auxiliary power system (APS) to power a heater, air conditioner, or any ancillary equipment on that vehicle during sleeping or resting in a sleeper berth for greater than 5.0 minutes at any location when within 100 feet of a restricted area, except as noted in Subsection (d) of the regulation.
- Signs must be posted in the designated queuing areas and job sites to remind drivers of the five-minute idling limit. The specific requirements and exceptions in the regulation can be reviewed at the following web site: www.arb.ca.gov/ourwork/programs/atcm-to-limit-vehicle-idling.

Idling Restrictions for Off-Road Equipment

- Off-road diesel equipment shall comply with the five-minute idling restriction identified in Section 2449(d)(3) of the California Air Resources Board's In-Use Off-Road Diesel regulation: www.arb.ca.gov/regact/2007/ordiesl07/frooal.pdf.
- Signs shall be posted in the designated queuing areas and job sites to remind offroad equipment operators of the five-minute idling limit.

Fugitive Dust

- Reduce the amount of disturbed area where possible.
- Use of water trucks or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site. An adequate water supply source must be identified. Increased watering frequency would be required whenever wind speeds exceed 15 mph. Reclaimed (non-potable) water should be used whenever possible.

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- All dirt stockpile areas should be sprayed daily as needed, covered, or a District approved alternative method will be used.
- Permanent dust control measures identified in the approved project revegetation and landscape plans should be implemented as soon as possible following completion of any soil disturbing activities.
- Exposed ground areas that will be reworked at dates greater than one month after initial grading should be sown with a fast-germinating non-invasive grass seed and watered until vegetation is established.
- All disturbed soil areas not subject to re-vegetation should be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the District.
- All roadways, driveways, sidewalks, etc. to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.
- Vehicle speed for all construction vehicles shall not exceed 15 mph on any unpaved surface at the construction site.
- All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least two feet of freeboard (minimum vertical distance between top of load and top of trailer) in accordance with local regulations.
- Install wheel washers where vehicles enter and exit unpaved roads onto streets or wash off trucks and equipment leaving the site.
- Sweep streets at the end of each day if visible soil material is carried onto adjacent paved roads. Water sweepers with reclaimed water should be used where feasible.
- Post a sign in a prominent location visible to the public with the telephone numbers of the contractor and District for any questions or concerns about dust from the project.

District Rules

A summary of the applicable BCAQMD rules is provided in Section 3.3.1, *Regulatory Framework*. As discussed in Section 3.3.4, *Project Impact Analysis*, the proposed project would comply with these as applicable.

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3.3.4 Project Impact Analysis

a) **Would the project conflict with or obstruct implementation of the applicable air quality plan?**

BCAQMD identifies the most recent NSVPA AQAP as the applicable air quality plan and states that a project would conflict with this plan if it would result in or induce growth in population, employment, land use, or regional VMT inconsistent with the growth projections reflected in the AQAP. The proposed project would involve the expansion of educational and sports facilities at an existing high school campus and would result in no increase in student enrollment or trips to the project site. Therefore, it would not result in any increase in population, employment, or VMT, nor would it change the existing General Plan designation or zoning of the project site that designates the site for institutional land uses or private land uses which serve a community purpose or benefit the community. As such, the proposed project would not conflict with the growth projections in the NSVPA AQAP.

Furthermore, the proposed project would be required to comply with applicable BCAQMD rules that have been adopted to help meet the attainment goals of the NSVPA AQAP. Applicable rules for the proposed project include the following.

- **Rule 205 (Fugitive Dust Emissions).** The proposed project would comply with BCAQMD's Fugitive Dust Best Practices which are used to implement this rule. The proposed project would also implement applicable best available control measures to minimize fugitive dust emissions and sediment migration through implementation of a Stormwater Pollution Prevent Plan during construction activities as a result of disturbing greater than one acre of area.
- **Rule 230 (Architectural Coatings).** The proposed project would comply with this rule by using coatings from manufacturers subject to this rule. This rule reflects CARB's Suggested Control Measure for manufacturers of coatings and sealers that meet specified VOC content limits, including a limit of 100 grams/liter for flat coatings and 150 grams/liter for non-flat coatings.
- **Rule 430 (State New Source Rule).** The proposed project is not anticipated to include any new stationary source equipment. However, should the proposed project include sources subject to new source review, it would undergo BCAQMD's permitting process, including seeking an authority to construct permit.

In summary, the proposed project would comply with all applicable BCAQMD rules that help to implement the AQAP and would not result in changes to the growth projections reflected in the AQAP. Therefore, impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

-
- b) **Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?**
-

CONSTRUCTION

Development of the proposed project would result in short-term construction-related criteria pollutant emissions that have the potential to have an adverse effect on air quality. Potential construction-related air quality impacts are determined by comparing the daily and yearly criteria air pollutants emissions generated by the project-related construction activities to BCAMQD's significance thresholds in Table 3.3-7, *Construction-Related Criteria Air Pollutant Emissions*. The proposed project would comply with BCAQMD's best practices for controlling construction emissions which include practices for DPM exhaust and fugitive dust and restrictions on equipment idling, in compliance with State laws, as detailed in Section 3.3.3, *Standards for Analysis*.

As shown in Table 3.3-7, criteria air pollutant emissions from construction emissions would not exceed the BCAQMD construction-related daily or yearly thresholds. Additionally, the proposed project would comply with BCAQMD's best practices for controlling construction emissions, which include practices for DPM exhaust and fugitive dust and restrictions on equipment idling according to State laws, as detailed in Section 3.3.3, *Standards for Analysis*. Therefore, impacts associated with construction air pollutant emissions would be **less than significant**.

Significance without Mitigation: Less than significant.

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Table 3.3-7 Construction-Related Criteria Air Pollutant Emissions Estimates

Construction Activity	Criteria Air Pollutants ¹		
	NO _x	ROG	PM ₁₀
Maximum Daily (lbs./day)			
Phase 1	17	3	5
Phase 2	27	7	10
BCAQMD Construction Threshold	137	137	80
Exceeds Maximum Daily Threshold?	No	No	No
Annual (tons/year)			
2026 (Phase 1)	<1	<1	<1
2027 (Phase 1)	1	<1	<1
2030 (Phase 2)	1	<1	<1
2031 (Phase 2)	<1	<1	<1
BCAQMD Construction Threshold	4.5	4.5	--
Exceeds Maximum Daily Threshold?	No	No	--

Source: CalEEMod v. 2022.1; BCAQMD 2024.

1. Air quality modeling based on a construction schedule and information provided by the District. Where specific information regarding project-related construction activities was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by South Coast AQMD of construction equipment and phasing for comparable projects.
2. Includes implementation of fugitive dust control measures required by BCAQMD under Rule 205, including watering disturbed areas and unpaved roads a minimum of two times per day.

OPERATION

Typical long-term air pollutant emissions are generated by area sources (e.g., landscape fuel use, aerosols, architectural coatings, and asphalt pavement), mobile sources (i.e., on-road vehicles), and energy use (natural gas). The proposed project would not result in an increase in student enrollment at the Paradise HS campus or new trips to the project site. Existing events at Paradise HS sports facilities would be moved to the proposed practice field/stadium, and no increase in spectators would result from the relocation of the events. Additionally, no mechanical equipment or farm equipment would be located at the project site, nor would any diesel-powered equipment be required during operation. Furthermore, none of the proposed facilities would connect to natural gas infrastructure.

Therefore, operational emissions associated with the proposed project would consist of area sources. However, because the proposed project would result in an increase of less than one pound per day of all criteria air pollutant emissions, it would not exceed the BCAQMD operational significance threshold of 25 pounds per day for ROG and NO_x. Therefore, operational emissions associated with the proposed project would be **less than significant**.

Significance without Mitigation: Less than significant.

c) **Would the project expose sensitive receptors to substantial pollutant concentrations?**

Construction Health Risk

Project construction activities have the potential to generate TAC emissions, specifically DPM and fugitive dust, from the use of construction equipment that could affect existing sensitive receptors. As shown in Table 3.3-5, several sensitive receptors within 1,000 feet of the proposed project could be exposed to emissions of TACs from construction activities at the project site. The proposed agricultural building would be constructed over a period of nine months from 2026 to 2027, and the stadium/practice field and parking lot would be constructed in approximately 12 months, from 2030 to 2031. The Office of Environmental Health Hazards Assessment's *Guidance Manual for Preparation of Health Risk Assessments* recommends that health risks be assessed over a 70-year averaging time. Therefore, the project's construction health risk during this limited duration would be unlikely to exceed BCAQMD's health risk thresholds, which account for a lifetime of exposure. Additionally, as shown in Table 3.3-7, construction emissions associated with the proposed project would not exceed BCAQMD's regional significance thresholds. All construction equipment and its operation would also be subject to BCAQMD rules and regulations, including diesel construction equipment. Therefore, construction of the proposed project would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be **less than significant**.

Operational Health Risk

Operation LSTs

Because the installation and use of stationary source equipment is not proposed as part of the project, operation of the proposed project would not generate substantial emissions from on-site stationary sources. Land uses that have the potential to generate substantial stationary sources of emissions include industrial land uses, such as chemical processing and warehousing operations where truck idling would occur on-site and would require a permit from BCAQMD. The proposed project would expand the agricultural education and sport facilities of Paradise HS, which do not fall within this category of uses. Localized air quality impacts related to operation-related emissions would be **less than significant**.

Significance without Mitigation: Less than significant.

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Carbon Monoxide Hotspots

The proposed project could contribute to a CO hotspot if it would increase traffic volumes above 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (Bay Area Air District 2023). Traffic counts published by the BCAG note that the roadway segment fronting the project site, Elliot Road east of Skyway, had 375 AM peak hour trips in 2022/2023 (BCAG 2023). Existing trips to the Paradise HS campus related to events at the existing sports facilities account for 257 AM peak hour trips. Since the proposed project would not generate additional peak hour trips, the proposed project would not increase peak hour traffic volumes at affected intersections to exceed the Bay Area Air District’s recommended hourly screening criteria. Thus, the proposed project would not introduce new vehicle trips which may result in a CO hotspot when combined with existing traffic volumes and impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Odor impacts associated with a proposed project would be considered significant if the project has the potential to frequently expose members of the public to objectionable odors. BCAQMD’s Handbook identifies screening distances for various odor sources, as shown in Section 3.3.3. The proposed project includes a 1,728-square foot agricultural building with eight livestock stalls, which could classify the proposed project as an animal boarding facility pursuant to BCAQMD’s guidance. BCAQMD’s screening levels of potential odor sources do not identify a screening distance for animal boarding facilities, but it does identify a screening distance of one mile for feed lots/dairies. As shown in Table 3.3-5, numerous sensitive receptors, including residences and the Paradise HS campus, are within 1,000 feet of the proposed project. This includes residences immediately adjacent to the project site to the west.

Under the proposed project, livestock areas would be regularly cleaned and maintained. As described in Section 2.5.3 of Chapter 2, the proposed project would also implement an odor management plan consisting of the following strategies:

- Stalls would be regularly cleaned and layered with wood chips to absorb and contain odors.
- Woodchips and manure removed from the barn would be stored and composted for re-use around PUSD.
- Manure would be covered to contain the potential odors.
- Manure would be treated, if necessary, with natural amendments to adjust the pH levels.

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- Animal feed would be adjusted to reduce nitrogen and sulfur compounds, which will minimize odor-causing compounds.
- Constant ventilation would be used inside of the barn to remove odors and stale air.
- Signs would be posted at the entry to the proposed facility and include the contacts for any comments or complaints from the community, which will be promptly responded to.

The proposed odor management plan would ensure that odors on the property are mitigated and contained from spreading to nearby receptors. These actions would ensure compliance with BCAQMD's odor nuisance Rule 200, reducing impacts to **less than significant**.

Significance without Mitigation: Less than significant.

3.3.5 Cumulative Impact Analysis

The cumulative area of analysis is the SVAB. As noted in Section 3.3.2, *Existing Conditions*, California is divided into air basins for the purpose of managing the air resources of the state on a regional basis based on meteorological and geographic conditions. Similar to GHG emissions impacts, air quality impacts are regional in nature as no single project generates enough emissions that would cause an air basin to be designated as a nonattainment area.

Would the project have a cumulative effect related to air quality?

AIR QUALITY PLAN CONSISTENCY

As discussed in Impact Discussion a), the proposed project would not conflict with or obstruct the implementation of the most recent NSVPA AQAP. The proposed project is consistent with the land use of the project and would not introduce new population growth in the region. Additionally, the VMT and air quality emissions contributed by the proposed project are considered less than significant under the applicable thresholds. Other projects in the SVAB would also be required to demonstrate consistency with the AQAP or other applicable air quality plans and ensure that regional emissions generated by the project are reduced to below the applicable air district's emissions thresholds. Therefore, the proposed project would not have any cumulatively considerable impacts with respect to AQP consistency, and impacts would be less than significant.

CRITERIA AIR POLLUTANTS

Impact Discussion (b) analyzes potential cumulative impacts to air quality that could occur from construction and operation of the proposed project in the context of regional growth projections in the SVAB. As shown in Table 3.3-7, construction of proposed project would not

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exceed BCAQMD's significance criteria. Additionally, because the proposed project would not result in an increase in trips to the project site or connect to natural gas infrastructure, impacts associated with operational emissions would also be below BCAQMD significance criteria. Furthermore, the proposed project, along with all other projects in Butte County, would be required to implement the applicable BCQMD rules and regulations related to particulate matter and follow BCAQMD's best practices for controlling construction emissions. Therefore, the proposed project would not cumulatively contribute to the nonattainment designations of the SVAB, and this cumulative impact would be less than significant.

TOXIC AIR CONTAMINANTS

As discussed in Impact Discussion (c), construction emissions under the proposed project would be limited in duration and scope, resulting in less than significant impacts with respect to TAC emissions. This impact is specific to the direct vicinity of the proposed project and since no other projects would be under construction in the vicinity of the project site, the proposed project would not contribute to a cumulative impact. Additionally, the operation of the proposed project would not include stationary sources that emit TACs or generate a significant amount of heavy-duty truck trips. As discussed in Impact Discussion (c), the proposed project would not contribute to CO hotspots. Thus, cumulative localized health risk impacts would be less than significant.

ODORS

As discussed in Impact Discussion d), the proposed project would implement an odor management plan to ensure that potential odors from the proposed agricultural building are contained and managed. All other projects in the project vicinity would comply with Prohibited Discharges regulations under HSC 41700 that prohibits the discharge of nuisance odors in the vicinity of receptors. Therefore, the proposed project would not have any cumulatively significant impacts related to odors, and impacts would be less than significant.

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3.4 BIOLOGICAL RESOURCES

This section of the Draft Environmental Impact Report (DEIR) evaluates the potential impacts of the proposed project to biological resources on the project site and project area. The analysis in this section is based in part on the following technical report:

- *Biological Resource Evaluation for Paradise High School Expansion Project*, HANA Resources, February 2026

A complete copy of this technical report is provided in Appendix C of this DEIR.

During the Notice of Preparation (NOP) public review period, one comment letter was received from the California Department of Fish and Wildlife (CDFW) regarding biological resources impacts associated with the proposed project. The NOP is included as Appendix A of this DEIR.

3.4.1 Regulatory Framework

Federal, state, and local laws, regulations, plans, or guidelines that are related to protection and preservation of biological resources and applicable to the proposed project are summarized below.

FEDERAL

Endangered Species Act

The federal Endangered Species Act (ESA) of 1973 (US Code, Title 16, §§ 1531–1543) (ESA), as amended, designates and provides for protection of listed threatened and endangered plant and animal species, and their critical habitat. The United States Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) share responsibility for administration of the ESA. These responsibilities include listing and delisting species, designating critical habitat, and formulating recovery plans. The USFWS has primary responsibility for terrestrial and freshwater organisms, and the responsibilities of NMFS are mainly marine wildlife.

Section 9: Prohibited Acts

Once a species is listed, Section 9 of the ESA makes it unlawful for any person, including private and public entities, to “take” endangered species without a permit issued pursuant to Section 10 or an incidental take statement issued pursuant to Section 7. Section 9 defines “take” as “to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect or attempt to engage in any such conduct.” The term “harm” is defined as “an act that actually kills or injures wildlife,”

3.4 BIOLOGICAL RESOURCES

which may include substantial habitat modification or degradation where it significantly impairs essential behavioral patterns, including breeding, feeding, or sheltering.

ESA section 9 take prohibitions apply to listed wildlife and fish species, but not to plants. Endangered plants are not protected from take, although it is unlawful to remove, possess, or maliciously damage or destroy them on federal lands. Removing or damaging listed plants on state and private lands in knowing violation of state law, or in the course of violating a state criminal trespass law, is also prohibited under the ESA.

Section 10 (Incidental Take Permits and Habitat Conservation Plans)

An incidental take permit pursuant to Section 10(a)(1)(B) is required when non-federal, otherwise lawful activities, including lawful project development, may result in the take of federally listed threatened or endangered wildlife. Under this provision, the USFWS and/or NMFS may, where appropriate, authorize the take of federally listed wildlife or fish species if such take occurs during otherwise legal activities. Section 10(a)(2)(B) requires an application for an incidental take permit to include a habitat conservation plan (HCP). The purpose of the habitat conservation planning process is to ensure adequate avoidance, minimization, and mitigation measures are implemented to address the effects of the authorized incidental take. Section 10 provides a clear regulatory mechanism to authorize incidental take of federally listed fish and wildlife species by private interests and non-federal governmental agencies.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) of 1918 (Title 16, US Code sections 703–712), as amended, implements international treaties and conventions between the United States and Canada, Japan, Mexico, and Russia for the protection of migratory birds (USFWS 2026a). The MBTA makes it unlawful to pursue, hunt, take, capture, kill, possess, sell, purchase, barter, import, export, or transport any migratory bird, or any part, nest, or egg of such a bird, unless authorized under a permit issued by the Secretary of the Interior. Some regulatory exceptions apply. Take is defined in regulations implementing the MBTA as “to pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to carry out these activities.”

The MBTA prohibits the collection and destruction of migratory birds, their nest, and birds or eggs in the nest. The USFWS’s Migratory Bird Permit Memorandum (MBPM-2), dated April 15, 2003, clarifies that destruction of most unoccupied bird nests is permissible with exceptions including nests of federally listed threatened or endangered migratory birds, bald eagles, and golden eagles. Take under the MBTA does not include habitat destruction or alteration, as long as there is no direct taking of birds, nests, eggs, or parts thereof. The USFWS has statutory authority and responsibility for enforcing the MBTA.

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Bald and Golden Eagle Protection Act

The Bald and Golden Eagle Protection Act (16 US Code Section 668) provides for the protection of bald and golden eagle by prohibiting the take, possession, sale, and commerce of such birds, except under certain specified conditions. If compatible with the preservation of bald and golden eagles, the Secretary of the Interior may issue permits for the take, possession, or transportation of bald and golden eagles and their nests for scientific or religious purposes, or for the protection of wildlife, agricultural, or other interests. The Secretary of the Interior may authorize the take of golden eagle nests that interfere with resource development or recovery operations. Bald eagles may not be taken for any purpose unless authorized by permit prior to the taking.

Clean Water Act

The federal Clean Water Act (CWA) (33 US Code Sections 1251–1376) is the principal federal law governing water pollution control and surface water quality in the U.S. It establishes the basic structure for regulating discharges of pollutants into “waters of the United States” (WOTUS) and for establishing water quality standards for surface waters. Sections 401, 402, and 404 of the CWA are pertinent to surface and coastal waters of the U.S.

For purposes of Section 404 permitting, “waters of the U.S.” include wetland and non-wetland water bodies of water that meet the criteria in the Code of Federal Regulations (CFR) Title 33, Section 328.3, as interpreted through judicial decisions and agency guidance, including *Solid Waste Agency of Northern Cook County v. U.S. Army Corps of Engineers*, 531 U.S. 159 (2001); *Rapanos v. United States* and *Carabell v. United States*, 547 U.S. 715 (2006); and joint guidance issued by the US Army Corps of Engineers (USACE) and United States Environmental Protection Agency (EPA), including the December 12, 2008 CWA Jurisdiction Regulatory Guidance.

Section 404: Discharge of Dredge and Fill Requirements

Section 404 of the CWA regulates the discharge of dredged or fill material into waters of the U.S. The USACE’s implementing regulations define “dredged material” as material that is excavated or dredged from waters of the U.S. and “fill material” as material placed in waters of the U.S. that replaces any portion of waters of the U.S. with dry land or changes the bottom elevation. Examples include discharges of rock, sand, soil, clay, plastics, construction debris, wood chips, overburden from mining or excavation activities, and materials used to create structures or infrastructure within waters of the U.S.

Section 401: Water Quality Certification

Although the CWA is a federal law, Section 401 recognizes states’ authority to establish and enforce surface water quality standards and requires the USACE to obtain state water quality certification for permits authorizing discharges of dredged or fill material. Section 401 requires

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every applicant for a Section 404 permit to certify that proposed discharges will comply with applicable state water quality standards set pursuant to the CWA and applicable state law.

STATE

California Endangered Species Act

The California Endangered Species Act (CESA) (California Fish and Game Code Section 2050 et seq.) was enacted in 1984 to parallel the federal ESA and allows the California Fish and Game Commission to designate species, including plants, as “threatened” or “endangered.” CESA states that all native species of fishes, amphibians, reptiles, birds, mammals, and plants, and their habitats that are threatened with extinction or experiencing a significant decline which, if not halted, could lead to threatened or endangered designation, will be protected or preserved. Unlike the ESA, the CESA does not include listing provisions for invertebrate species.

CESA prohibits the import, export, take, possess, purchase, sell, or attempt commission of any of these actions to species that are designated as threatened, endangered, or candidates for listing, unless authorized by the California Department of Fish and Wildlife (CDFW). Section 2080 of the California Fish and Game Code prohibits take of any species determined by the Commission to be endangered or threatened. “Take” is defined in Section 86 of the California Fish and Game Code as “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.”

Under Section 2081 of CESA, CDFW may authorize take or possession of threatened, endangered, or candidate species for scientific, educational, or management purposes, and may authorize incidental take with other lawful activities if certain conditions are met. These conditions include minimization and full mitigation of adverse effects, assurance of adequate funding for mitigation implementation, and a determination that the authorized activity shall not jeopardize the continued existence of listed species. CESA emphasizes early consultation to avoid or minimize potential impacts to candidate and listed endangered and threatened species, and to develop appropriate mitigation to offset project-related losses of listed species populations and their essential habitats.

California Fish and Game Code Sections 1600 to 1616

Pursuant to Sections 1600 to 1616, CDFW regulates all substantial diversions, obstructions, or changes to the natural flow or the bed, channel, or bank of any river, stream, or lake that provide habitat for fish or wildlife. CDFW defines a “stream” (including creeks and rivers) as “a body of water that flows at least periodically or intermittently through a bed or channel having banks and supports fish or other aquatic life, including watercourses having surface or subsurface flow that supports or has supported riparian vegetation” (California Code of Regulations, Title 14, Division 1, Subdivision 1, Chapter 1, Section 1.72). “Bank” means the slope or elevation of land that bounds the bed of a stream in a permanent or longstanding way and

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confines the stream water up to its highest level and “lake” includes “natural lakes and manmade reservoirs.”

Rivers, streams, lakes, and riparian vegetation that provide habitat for fish and wildlife species are subject to CDFW jurisdiction under Sections 1600 to 1616. Riparian areas are lands adjacent to streams, lakes, and estuarine-marine shorelines. Section 2785(e) defines “riparian habitat” as lands containing habitat that grows close to and depends upon soil moisture from a nearby freshwater source. CDFW regulates the bed, banks, associated riparian vegetation, and fish and wildlife resources within its jurisdiction. CDFW generally interprets jurisdictional boundaries as extending to the top of bank (i.e., the limit of stream influence) and/or the limit of the canopy of riparian vegetation (outer drip line) that is hydrologically connected to a river, stream, or lake, whichever is greater. As a result, the area of CDFW jurisdiction is usually greater than the active channel and overlaps and extends beyond the USACE jurisdiction. Isolated wetlands not associated with a river, stream or lake are not protected under Section 1600 et seq. of the California Fish and Game Code. In addition, CDFW does not have regulatory authority on tribal lands.

California Native Plant Protection Act

The California Native Plant Protection Act of 1977 (Cal. Fish and Game Code Sections 1900 et seq.) prohibits importation of rare and endangered plants into California, “take” of rare and endangered plants, and sale of rare and endangered plants. CESA defers to this act, which ensures that state-listed plant species are protected when state agencies are involved in projects subject to CEQA. Plants listed as rare under the California Native Plant Protection Act are not protected under CESA; however, impacts to endangered, rare, or threatened species, including plants, are evaluated under CEQA.

LOCAL

Town of Paradise Municipal Code

The Paradise Municipal Code embodies the local laws and regulations governing land use, development, and environmental protection in the town. Among its provisions, the municipal code includes specific measures that relate to biological resources.

- **Chapter 8.12, Felling, Removal, Destruction, Damaging, and Replacement of Trees.**
Paradise Municipal Code requires a permit for the felling or removal of a qualifying tree, defined as any living woody perennial plant characterized by one or more main stems, or trunks, with at least one stem or trunk measuring either 31 inches or greater in circumference or 10 inches or greater in diameter at breast height (dbh). All tree measurements shall be taken at breast height, defined as four feet, six inches above natural grade, measured on the uphill side of the tree. A tree felling permit may be issued for a variety of reasons listed in the Paradise Municipal Code Section 8.12.090.

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- **Section 8.12.090, Felling of Trees.** Tree felling may be authorized where qualifying trees interfere with the construction or establishment of a town authorized structure or structure addition, driveway, parking lot or parking area, walkway, patio, swimming pool, or deck, or interfere with the construction of private or public access and/or drainage improvements. This provision also applies to trees located within areas approved by the town for grading or filling activities. Reasonable conditions may be imposed as part of the issuance of a tree felling permit.

Any permit application filed with town officials proposing the felling of nine or more qualifying trees from a single legal parcel within a twelve-month period shall include a written explanation by a qualified tree expert, submitted under penalty of perjury, demonstrating that felling is required based on the circumstances identified under this chapter.

- **Section 8.12.100, Damage to Trees.** It is unlawful for any person to damage a qualifying tree, including willfully face-cutting, girdling, or otherwise fatally injuring a qualifying tree, unless a valid tree felling permit has been issued. Additionally, no person shall trench, excavate, alter grades, place impervious surfacing, or cause mechanical damage within the root zone of a qualifying tree affecting more than 50 percent of the tree's dripline area prior to issuance of a tree felling permit.
- **Section 8.12.110, Protection of Trees During Construction:** All development shall be designed and constructed in a manner that considers the retention and protection of existing trees. No tree felling permit shall be issued for new commercial, community services, industrial, or residential construction until all required septic system construction permits have been issued and any required building permits have been filed with the town. Additionally, no tree felling permits will be issued to accommodate construction of roads, drainages, or other site improvements until all required improvement plans have been approved and signed by the town engineer. During construction, all trees not authorized for removal shall be protected from damage by construction equipment and activities.

3.4.2 Existing Conditions

The project site is currently vacant and previously contained the First Assembly of God Church, associated parking lot, and multiple residential structures that burned down during the 2018 Camp Fire. The hardscape parking lot remains on the eastern portion of the project site. Storage containers sit in the central portion of the project site. The remaining area on the westside is vacant of any structures. The project site and surrounding area are nearly flat, with a slight slope from east to west. The on-site vegetation is characteristic of existing site conditions and dominated by non-native ornamental and ruderal species associated with landscaping and previous land uses. There are existing landscape trees scattered throughout the project site. The surrounding land uses near the project site consist of Paradise HS to the north, established

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residential neighborhoods characterized by single-family homes to the south and east, a cemetery to the south, and commercial and public facility uses to the east.

As part of the Biological Resources Evaluation, a literature review and biological reconnaissance survey was performed within the biological study area (BSA). The BSA includes the project site and a 500-foot buffer zone around the project site and represents the project site and surrounding area. The following existing conditions information is based on the results of the literature review and biological reconnaissance survey (Appendix C).

SOILS

Soil maps for the site were referenced online to determine the types of soil found on the project site. It was determined that the BSA is composed of one soil type.

- **829: Paradiso loam, 2 to 15 percent slopes.** The Paradiso loam is characterized by a mean annual precipitation range of approximately 35 to 73 inches and a mean annual air temperature range of approximately 54°F to 59°F. The soil is typically at elevations from 1,220 to 3,730 feet. The Paradiso loam is composed of slightly decomposed plant material, loam, clay loam, and clay, and the parent material consists of clayey residuum weathered from volcanic rock. The soil is well drained, exhibits medium runoff potential, and is not classified as a hydric soil.

WETLANDS

Following review of the USFWS NWI Wetland Mapper, no wetlands were identified within the project site; however, one wetland was identified within the 500-foot buffer of the BSA, outside of the project site (USFWS 2026b). This wetland is classified as R4SBA and is 380 feet east of the project site; it extends north to south, crossing Elliott Road near the intersection of James Drive and continuing underground beneath the baseball field. Another wetland classified as R4SBC is approximately 250 feet east of the BSA along Elliott Road. Descriptions of these two wetlands follow.

- **R4SBA**
 - **Riverine (R):** Natural or artificial wetland contained within a channel that acts as an open conduit between two bodies of standing water.
 - **Intermittent (4):** Contains flowing water only part of the year. Water may remain as surface water or as isolated pools when not flowing.
 - **Stream Bed (SB):** Obligate to riverine systems; substrate varies greatly based on gradient of channel, velocity of water, and sediment present.
 - **Temporarily Flooded (A):** Surface water is present for brief periods during the growing season; water table usually lies well below the ground surface for most of the year.

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■ R4SBC

- **Riverine (R):** Natural or artificial wetland contained within a channel that acts as an open conduit between two bodies of standing water.
- **Intermittent (4):** Contains flowing water only part of the year. Water may remain as surface water or as isolated pools when not flowing.
- **Stream Bed (SB):** Obligate to riverine systems; substrate varies greatly based on gradient of channel, velocity of water, and sediment present.
- **Seasonally Flooded (C):** Surface water is present for extended periods during the growing season but absent by end of season. The water table is variable, extending from at surface to well below ground.

JURISDICTIONAL WATERS

HANA biologists examined the BSA to identify potential USACE jurisdiction pursuant to Sections 404 and 401 of the Clean Water Act and CDFW jurisdiction pursuant to Section 1602 of the CFGC. No jurisdictional drainages/areas were found on the project site.

SENSITIVE RESOURCES

Sensitive Vegetation Communities

Sensitive vegetation communities are defined as plant communities with limited statewide, regional, or county distribution and are often considered vulnerable. These communities may or may not support special-status plant species or their associated habitats. No sensitive vegetation communities are within a five-mile radius of the BSA.

Sensitive Plants

The literature review identified 74 special-status plant species with known occurrences within the BSA or within a five-mile radius of the project site, as presented in Table 4, *Special-Status Plant Species*, of Appendix C. Of the 74 species, 10 were determined to have low potential for occurrence, and 64 were determined to have no potential to occur within the BSA. Factors used to evaluate potential for occurrences included habitat suitability, soil type, disturbance associated with previous land use, and the date and spatial proximity of documented occurrences in CNDDDB, Jepson eFlora, and Calflora. Reconnaissance-level plant surveys were conducted to assess the presence or absence in the BSA. None of the 74 special-status plant species identified during the literature review were observed in the BSA. Further, due to the developed and maintained conditions of the BSA and its suburban setting, suitable habitat for listed plant species is absent.

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Sensitive Wildlife

The literature review identified 31 special-status wildlife species with known occurrences in the BSA or within a five-mile radius of the project site, as presented in Appendix C, Table 5, *Special-Status Wildlife Species*. Of the 31 special-status wildlife species, 2 were observed within the BSA during the reconnaissance-level wildlife survey, 16 were determined to have low potential for occurrence, and 13 were determined to have no potential for occurrence. Factors used to evaluate potential for occurrence included habitat suitability, soil type, disturbance associated with previous land use, and the date and location of documented occurrences in CNDDDB.

The two species that were observed during the reconnaissance level survey were Nuttall's woodpecker and the oak titmouse. These species are birds designated as Birds of Conservation Concern, which are considered sensitive but are not state or federally listed. Both species were detected south of the project site, across Elliott Road in the adjacent cemetery. No breeding behavior was observed during the reconnaissance survey.

The 16 wildlife species with low potential to occur on-site due to the limited habitat suitability in the BSA include:

- monarch butterfly (*Danaus plexippus*)
- golden eagle (*Aquila chrysaetos*)
- bald eagle (*Haliaeetus leucocephalus*)
- California spotted owl (*Strix occidentalis occidentalis*)
- western screech-owl (*Megascops kennicottii*)
- Bullock's oriole (*Icterus bullockii*)
- wrentit (*Chamaea fasciata*)
- white-headed woodpecker (*Leuconotopicus albolarvatus*)
- California thrasher (*Toxostoma redivivum*)
- Lawrence's goldfinch (*Spinus lawrencei*)
- Cassin's finch (*Haemorhous cassinii*)
- silver-haired myotis (*Lasionycteris noctivagans*)
- long-eared owl (*Asio otus*)
- Yuma myotis (*Myotis yumanensis*)
- olive-sided flycatcher (*Contopus cooperi*)
- coast horned lizard (*Phrynosoma blainvillii*)

Of the 16 sensitive wildlife species determined to have low potential for occurrence, only 4 species are federal- or state-listed species.

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- **Monarch Butterfly (*Danaus plexippus*)** is a federal-proposed threatened species that is typically found in meadows, gardens, and open fields across North America. It breeds in summer and migrates to central Mexico for winter. Its diet consists primarily of milkweed (*Asclepias* spp.) during the larval stage, and adults feed on nectar from a variety of flowering plants, including goldenrod (*Solidago* spp.) and asters (*Aster* spp.). This species has low potential for occurrence at the project site due to its wide-ranging and unpredictable dispersal behavior and the presence of low-quality foraging habitat in the BSA.
- **Golden eagle (*Aquila chrysaetos*)** is a CDFW fully protected watchlist species that typically occurs in mountainous canyon land, rimrock terrain of open desert and grassland areas. Habitat typically includes open rolling foothills of grasslands, oak savannas, oak and juniper woodlands, chaparral, mountain areas, and desert. It usually avoids heavily forested areas and extensive croplands. It may be found in coniferous habitat when open space is available (e.g., fire breaks, clear-cuts, burned areas, pasture-land). Golden eagles are typically not found in heavily forested areas, extensive croplands, or on the immediate coast and are almost never detected in urbanized environments. Golden eagles usually nest on cliffs. The BSA lacks sufficient foraging habitat and prey species. Occurrence is limited to potential temporary perching on pine trees in the BSA.
- **Bald eagle (*Haliaeetus leucocephalus*)** is a federally delisted, state endangered, and CDFW fully protected species that typically occurs in or near seacoasts, rivers, wetlands swamps, and large lakes. It requires large bodies of water or free flowing rivers with abundant fish and adjacent snags or other perches and nesting sites. Perching sites need to consist of large trees or snags with heavy limbs or broken tops. It roosts communally in winter in dense, sheltered, remote conifer stands. The BSA lacks the nearby water bodies this species is tied to, and occurrence potential is limited to temporary perching.
- **California spotted owl (*Strix occidentalis occidentalis*)** is a federal and state threatened species that typically breeds and roosts in forests and woodlands with large old trees and snags, high basal areas of trees and snags, dense canopies (>70 percent canopy closure), multiple canopy layers, and downed woody debris. Large, old trees are the key component. The BSA contains tree species that are associated with this species; however, it is fairly urban and lacks modern occurrence documentation in the immediate area. As a result, potential for occurrence is limited to perching during foraging.

The remaining 12 species with low potential for occurrence are sensitive but unlisted. For these species, low potential is attributed to limited habitat suitability in the BSA and the highly mobile or transient nature of many of the bird species. Foraging opportunities are minimal but possible, but nesting habitat in the BSA is limited due to disturbance. The Yuma myotis and silver-haired myotis both lack suitable roosting habitat but have open areas on which to forage. The coast horned lizard has been documented in the surrounding area; however, the BSA lacks

3.4 BIOLOGICAL RESOURCES

the loose fine soils that this species utilizes, limiting the potential for occurrence to potential foraging opportunities.

CRITICAL HABITATS

The BSA does not overlap with any designated critical habitat, HCPs, or natural community conservation plans (NCCP); however, proposed critical habitat for the North Feather Distinct Population Segment of the foothill yellow-legged frog (*Rana boylei*) is approximately 2 miles from the BSA. The BSA lacks suitable habitat to support this species and is sufficiently distant from known occurrences that movement into the BSA is not expected.

WILDLIFE MOVEMENT CORRIDORS

Based on the CDFW BIOS6 data viewer, the project site is not in a California Essential Habitat Connectivity area (essential connectivity areas and natural landscape blocks) (CDFW 2026a). The project site is in terrestrial connectivity rank 1, Limited Connectivity Opportunity, the lowest rated connectivity rank.

HABITAT MANAGEMENT PLANS

The Natural Community Conservation Planning (NCCP) Program is a cooperative effort designed to protect species and their habitats through an ecosystem approach (CDFW 2026a). The program helps identify and provide for large area-wide protection of plants, animals, and their habitats while allowing for compatible and appropriate economic activity. Additionally, a habitat conservation plan (HCP) is a planning document designed to accommodate economic development to the extent possible by authorizing the limited and unintentional take of listed species when it is incidental to otherwise lawful activities.

Based on the CDFW Open Data Portal, Conservation Plan Boundaries HCP/NCCP, there are no NCCP/HCP in Butte County, which includes the project site (CDFW 2026c).

3.4.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact on biological resources if it would:

- a) Have a substantial effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in

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local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

- b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.
- c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
- d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.
- e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
- f) Conflict with the provisions of an adopted Habitat Conservation Plan; Natural Community Conservation Plan; or other approved local, regional, or state habitat conservation plan.

METHODOLOGY

As previously identified, the following environmental evaluation is based off the *Biological Resource Evaluation for Paradise High School Expansion Project* (Appendix C) prepared by HANA in February 2026. The Biological Resource Evaluation includes findings based on a literature review and reconnaissance-level survey of the BSA. The literature review consisted of a search of the following resources and databases:

- Paradise East 7.5-minute USGS topographic quadrangle
- U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Web Soil Survey
- USFWS National Wetland Inventory (NWI) Wetland Mapper
- USFWS Environmental Conservation Online System (ECOS)
- USFWS Information for Planning and Consultation (IPaC)
- CDFW California Natural Diversity Database (CNDDB)
- CNPS Electronic Inventory of Rare and Endangered Vascular Plants of California
- Other relevant community-based and citizen science occurrence databases

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A biological reconnaissance field survey was conducted within the BSA to evaluate the potential for occurrence of sensitive plant and wildlife species, sensitive vegetation communities, and habitats capable of supporting sensitive wildlife species. Survey activities included vegetation mapping, plant identification, and opportunistic wildlife observations. The survey was conducted on foot by a qualified HANA biologist on December 10, 2025.

The results of the literature review and biological reconnaissance field survey were used to assign a “potential for occurrence” status to sensitive resources. The criteria used to evaluate potential for occurrence on the project site are presented below:

- **None.** Species was not observed during focused surveys conducted at an appropriate time for identification of the species and species is restricted to habitats or environmental conditions that do not occur within the site.
- **Low.** Historical records for this species do not exist within the immediate vicinity of the site (approximately 5 miles) and/or habitats or environmental conditions needed to support the species are of poor quality.
- **Moderate.** Either a historical record exists of the species within the immediate vicinity of the site (approximately 5 miles) and marginal habitat exists on the site, or the habitat requirements or environmental conditions associated with the species occur within the site, but no historical records exist within 5 miles of the site.
- **High.** Both a historical record exists of the species within the site or its immediate vicinity (approximately 5 miles), and the habitat requirements and environmental conditions associated with the species are present within the site.
- **Present.** Species was detected within the site at the time of the survey.

If sensitive biological resources were to be present on-site, project activities would have the potential to adversely impact such resources. Therefore, the following impact analysis evaluates the potential for sensitive biological resources on-site based on previous occurrences, existing site conditions, and other related factors.

3.4.4 Project Impact Analysis

-
- a) **Would the project have a substantial effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?**
-

The proposed project includes the construction of one new parking lot, one new agricultural building, and a new football stadium and practice sports field on a 7.31-acre project site. The project site consists of a predominantly vacant and disturbed field with landscaped-ruderal

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vegetation, remnants of a surface parking lot in the eastern portion of the project site, and storage containers in the central portion of the project site. The on-site vegetation is dominated by non-native ornamental and ruderal species associated with landscaping and previous land uses. There are existing landscape trees scattered throughout the project site. There are no other natural communities or other vegetation types on the project site.

Construction activities associated with the proposed project would have the potential to result in direct impacts (e.g., take) or indirect impacts (e.g., habitat loss or modification or noise, dust, or light pollution) to sensitive plant and wildlife species if present on-site. The following paragraphs analyze potential impacts on special-status plant and wildlife species.

SENSITIVE PLANTS

Of the 74 special-status plant species with known occurrences in the BSA or within a five-mile radius of the project site, 10 were determined to have low potential for occurrence and 64 were determined to have no potential to occur in the BSA (see Table 4 in Appendix C). None of the 74 sensitive plant species identified during the literature review were observed in the BSA during the reconnaissance-level survey. Further, due to the developed and maintained conditions of the BSA and its suburban setting, suitable habitat for sensitive plant species is absent; therefore, there is no potential for listed plant species. Due to the absence of sensitive plant species on the project site, construction activities for implementation of the proposed project would not have the potential to result in direct or indirect disturbance to sensitive plant species. Therefore, the project would not adversely affect sensitive plant species, and **no impact** would occur.

SENSITIVE WILDLIFE

As previously stated, of the 31 special-status wildlife species with known occurrences within the BSA or within a five-mile radius of the project site, two species were observed within the BSA during the reconnaissance-level survey, 16 were determined to have low potential for occurrence, and 13 were determined to have no potential for occurrence (see Table 5 in Appendix C). As identified in Section 3.4. 2, *Existing Conditions*, Nuttall's woodpecker and the oak titmouse were observed in the BSA, and there is low potential for monarch butterfly, golden eagle, bald eagle, and California spotted owl to occur on-site.

The BSA contains poor quality foraging habitat and is in the monarch butterfly's spring and summer breeding range. No milkweed (*Asclepias* spp.), which are required host plants for monarch breeding, were observed within the BSA. Because the BSA lacks breeding habitat requirements for monarch butterfly, this species is not expected on-site. As a result, the project would not have the potential to result in direct or indirect disturbance to this species.

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Nuttall's woodpecker and the oak titmouse were detected south of the project site, across Elliott Road in the adjacent cemetery, and no breeding behavior was observed during the reconnaissance survey. Nesting potential on-site is considered low due to the level of existing and ongoing disturbance. Therefore, the potential for these species to occupy the project site would be limited to perching. Additionally, due to the lack of suitable habitat conditions, the potential for bald eagle, golden eagle, and California spotted owl on-site is also limited to perching during foraging. Nevertheless, due to the presence of perching habitat for Nuttall's woodpecker, oak titmouse, golden eagle, bald eagle, and California spotted owl, there is potential for individuals to be present on-site during construction activities. Additionally, existing trees in the BSA have the potential to support general nesting by avian species. Birds could nest throughout the BSA, particularly in areas with dense shrub cover and tree canopy. The project includes construction activities and the removal of 18 existing trees that could directly or indirectly disturb perching or nesting avian species if present on-site. Although it is expected that individuals could vacate the site quickly to avoid disturbance due to their mobility and transient nature, the project would still have the potential to adversely affect bird species if present on-site during construction or tree removal activities through nest destruction or habitat modification. Without mitigation, this impact is **potentially significant**.

Mitigation Measure BIO-1 has been identified to reduce potential impacts to nesting migratory birds. Mitigation Measure BIO-1 states that in order to minimize impacts, vegetation clearing or ground-disturbing activities should be conducted during the non-breeding season (September 1 to February 14) to limit impacts to nesting birds. If vegetation clearing or ground-disturbing activities need to take place during breeding season (February 15 through August 31), a preconstruction nesting bird survey(s) will be required to remain in compliance with the Migratory Bird Treaty Act (MBTA). If special-status birds are determined to be nesting on-site, Mitigation Measure BIO-1 requires proper notification and implementation of buffers to avoid disturbance. Compliance with the MBTA and implementation of Mitigation Measure BIO-1 would reduce impacts to less than significant.

Significance without Mitigation: Potentially significant.

Impact BIO-1: The proposed project could have a substantial effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

Mitigation Measure BIO-1: Preconstruction Avian Survey. To the extent feasible, in order to minimize potential impacts to avian species, vegetation clearing or ground-disturbing activities should be conducted during the non-breeding season (September 1 to February 14) to limit impacts to nesting birds. If vegetation clearing or ground-disturbing activities need to take place during breeding season (February 15 through August 31), a pre-construction avian survey(s) will be required. The last survey should be

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conducted a minimum of three days prior to the start of work. The District shall hire a qualified biologist to prepare the preconstruction avian survey.

If any bird listed under the Migratory Bird Treaty Act is found to be nesting within the project site or within the area of vegetation or ground disturbing activities, a qualified biologist shall reach out to USFWS and CDFW immediately, any permitting requirements shall be adhered to, and an adequate protective buffer zone shall be established by a qualified biologist to protect the nesting site. The distance shall be determined by a qualified biologist based on the site conditions (e.g., topography, if the nest is in a line of sight of the construction, and the sensitivity of the birds nesting). Additional protective measures shall include establishment of clearly delineated exclusion zones (i.e., demarcated by identifiable fencing, such as orange construction fencing or equivalent) around each nest location as determined by a qualified biologist, taking into account the species of birds nesting, their tolerance for disturbance, and proximity to existing development. The nest site(s) shall be monitored by a qualified biologist periodically to see if the birds are stressed by the construction activities and if the protective buffer needs to be increased. Once the young have fledged and are flying well enough to avoid project construction zones (typically by August), the project can proceed without further regard to the nest site(s).

If an individual is observed perching but not nesting, work within a 500-foot buffer shall temporarily be put on hold and the individual will be allowed to leave on its own accord.

With implementation of Mitigation Measure BIO-1, implementation of the proposed project would not result in direct or indirect disturbance to sensitive bird species; therefore, the project would not adversely affect special-status wildlife, and impacts would be **less than significant**.

Significance with Mitigation: Less than significant.

b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

The project site consists of a predominantly vacant and disturbed field with landscaped-ruderal vegetation that is characteristic of existing site conditions and dominated by non-native ornamental and ruderal species associated with landscaping and previous land uses. No riparian habitat or other sensitive natural communities occur within the project site. Therefore, the project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service, and impacts would be **less than significant**.

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Significance without Mitigation: Less than significant.

c) Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Based on the literature review and reconnaissance-level field survey, no state or federally protected wetlands occur within the project site. Therefore, the project would not result in direct disturbance to wetlands. However, the project site is located at the top of a minor slope that drains toward two, distant off-site mapped drainages, including an intermittent riverine located 380 feet east of the project site and a separate intermittent riverine located 750 feet east of the project site. The project would be required to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP), which requires erosion control measures and stormwater best management practices (BMP) to be incorporated into construction plans. These measures may include straw wattles, silt fencing, or stabilized construction entrances to prevent sediment transport to off-site areas, including the distantly mapped off-site drainages.

Based on implementation of a SWPPP with BMPs, implementation of the proposed project would not have a substantial adverse effect on state or federally protected wetlands (including marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. Impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

d) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites?

Based on the CDFW BIOS6 data viewer, the project site is not within a California Essential Habitat Connectivity (essential connectivity areas and natural landscape blocks) (CDFW 2026a). The project site is terrestrial connectivity rank 1, Limited Connectivity Opportunity, the lowest connectivity rank. No federally designated critical habitat exists on-site; however, proposed critical habitat for the North Feather Distinct Population Segment of the foothill yellow-legged frog (*Rana boylei*) is approximately two miles from the BSA. The BSA lacks suitable habitat to support this species and is sufficiently distant from known occurrences that movement into the BSA is not expected. Further, due to the suburban setting of the project site and the associated lack of connectivity to natural habitat areas and waterways, the project site does not provide unimpeded migratory pathways for terrestrial or aquatic species.

The BSA is considered a migratory pathway, which is a potential stopover location during avian migration, but does not provide suitable avian breeding or nesting habitat to resident or

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breeding species. However, existing trees within the BSA have the potential to support general nesting by avian species. Nesting could occur throughout the BSA, particularly in areas with dense shrub cover and tree canopy. As a result, the project site should be treated as having the potential for nesting because the proposed project could include vegetation clearing or ground-disturbing activities during the avian breeding season (February 15 through August 31). Without mitigation, this impact is **potentially significant**.

As identified in Impact Discussion (a), Mitigation Measure BIO-1 has been identified to reduce potential impacts to nesting migratory birds by limiting vegetation clearing and ground-disturbing activities to the non-breeding season (September 1 to February 14). If the specified timing limitations are not feasible, a preconstruction nesting bird survey(s) will be required to remain in compliance with the Migratory Bird Treaty Act (MBTA). Compliance with the MBTA and implementation of Mitigation Measure BIO-1 would reduce impacts to less than significant.

Significance without Mitigation: Potentially significant.

Impact BIO-2: The proposed project could interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.

Mitigation Measure BIO-1: Preconstruction Avian Survey. To the extent feasible, in order to minimize potential impacts to avian species, vegetation clearing or ground-disturbing activities should be conducted during the non-breeding season (September 1 to February 14) to limit impacts to nesting birds. If vegetation clearing or ground-disturbing activities need to take place during breeding season (February 15 through August 31), a pre-construction avian survey(s) will be required. The last survey should be conducted a minimum of three days prior to the start of work. The District shall hire a qualified biologist to prepare the preconstruction avian survey.

If any bird listed under the Migratory Bird Treaty Act is found to be nesting within the project site or within the area of vegetation or ground disturbing activities, an adequate protective buffer zone shall be established by a qualified biologist to protect the nesting site. The distance shall be determined by a qualified biologist based on the site conditions (e.g., topography, if the nest is in a line of sight of the construction, and the sensitivity of the birds nesting). Additional protective measures shall include establishment of clearly delineated exclusion zones (i.e., demarcated by identifiable fencing, such as orange construction fencing or equivalent) around each nest location as determined by a qualified biologist, taking into account the species of birds nesting, their tolerance for disturbance, and proximity to existing development. The nest site(s) shall be monitored by a qualified biologist periodically to see if the birds are stressed by the construction activities and if the protective buffer needs to be increased. Once the

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young have fledged and are flying well enough to avoid project construction zones (Typically by August), the project can proceed without further regard to the nest site(s).

If an individual is observed perching but not nesting, work within a 500-foot buffer shall temporarily be put on hold and the individual will be allowed to leave on its own accord.

With implementation of Mitigation Measure BIO-1, implementation of the proposed project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites, and impacts would be **less than significant**.

Significance with Mitigation: Less than significant.

e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Paradise Municipal Code Chapter 8.12 requires a permit for the felling or removal of a qualifying tree, defined as any living woody perennial plant characterized by one or more main stems, or trunks, with at least one stem or trunk measuring 31 inches or greater in circumference or 10 inches or greater in diameter at breast height. All tree measurements shall be taken at breast height, defined as four feet, six inches above natural grade, measured on the uphill side of the tree. The proposed project would remove 18 existing on-site trees that may qualify under this ordinance and would be required to obtain the appropriate permits prior to removal. Compliance with Chapter 8.12 would ensure that tree removal is conducted in accordance with local regulations protecting biological resources. Therefore, the project would not conflict with applicable local policies or ordinances, and impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan; Natural Community Conservation Plan; or other approved local, regional, or state habitat conservation plan?

As stated in Section 3.4.2, *Existing Conditions*, above, the project site is not within any other HCP/NCCP or other approved local, regional, or state habitat conservation plan. Therefore, **no impact** would occur.

Significance without Mitigation: No impact.

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3.4.5 Cumulative Impact Analysis

Would the project have a cumulative effect related to biological resources?

As defined in Section 15130 of the State CEQA Guidelines, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects within the cumulative impact area for utilities and services. The study area for the assessment of cumulative impacts related to biological resources is the Paradise HS campus. There are currently no other projects proposed within the campus.

Development of the proposed project and related projects has the potential to encounter and potentially adversely affect sensitive avian species and off-site drainages. However, similar to the proposed project, each related project would be expected to comply with Public Resources Code Section 15064.5, perform site-specific biological resources analyses, implement mitigation measures if needed, and comply with other applicable regulatory compliance measures. With implementation of Mitigation Measures BIO-1, project-specific impacts would be reduced to less than significant, which would reduce the potential for the project to contribute to cumulative impacts to biological resources. Therefore, the proposed project would not have a cumulatively considerable effect related to biological resources, and cumulative impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

3.4.6 References

CDFW (California Department of Fish and Wildlife). 2026a, March 24 (accessed). Biogeographic Information Observation System (BIOS 6).

<https://apps.wildlife.ca.gov/bios6/?bookmark=648>.

CDFW. 2026b, March 24 (accessed). Habitat Conservation Planning Branch.

<https://wildlife.ca.gov/Organization/HCPB>.

CDFW. 2025c, March 24 (accessed). Conservation Plan Boundaries: HCP and NCCP [ds760].

<https://data-cdfw.opendata.arcgis>.

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USFWS (U.S. Fish and Wildlife Service). 2026a, April 1 (accessed). Migratory Bird Treaty Act of 1918. <https://www.fws.gov/law/migratory-bird-treaty-act-1918>.

USFWS. 2026b, March 31 (accessed). National Wetlands Inventory Surface Waters and Wetlands Mapper. <https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/>.

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This section of the Draft Environmental Impact Report (DEIR) evaluates the Paradise High School Expansion Project's (proposed project) potential impacts on cultural resources. The analysis in this section is based on the existing conditions of the current Paradise High School campus (Paradise HS or campus) and architectural renderings prepared for the proposed project. The analysis is also based in part on the following technical report.

- *Historical/Archaeological Resources Survey Report: Paradise USD Agricultural Building and Parking Lot Project, Town of Paradise, Butte County, California*, CRM Tech, February 2026

A complete copy of this technical report is provided in Appendix D of this DEIR.

During the Notice of Preparation (NOP) public review period, no comments were received regarding potential cultural resources impacts associated with the proposed project. The NOP is included as Appendix A of this DEIR.

3.5.1 Regulatory Framework

State and local laws, regulations, plans, or guidelines related to aesthetics that are applicable to the proposed project are summarized in this section.

FEDERAL

National Historic Preservation Act

The National Historic Preservation Act of 1966 (NHPA) coordinates public and private efforts to identify, evaluate, and protect the nation's historic and archaeological resources. The act authorized the National Register of Historic Places, which lists districts, sites, buildings, structures, and objects that are significant in American history, architecture, archaeology, engineering, and culture.

Section 106 (Protection of Historic Properties) of the NHPA requires federal agencies to take into account the effects of their undertakings on historic properties. Section 106 Review ensures that historic properties are considered during federal project planning and implementation. The Advisory Council on Historic Preservation, an independent federal agency, administers the review process with assistance from state historic preservation offices.

National Register of Historic Places

The National Register is a federally administered program maintained by the National Park Service. It is "an authoritative guide to be used by federal, state, and local governments, private

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groups, and citizens to identify the nation’s cultural resources and to indicate what properties should be considered for protection from destruction or impairment” (36 CFR Section 60.2). While the National Register itself does not provide automatic protection to properties on the list, it will trigger protective State or municipal laws, such as CEQA.

Criteria

To be eligible for listing in the National Register, a property (building, site, structure, object, or district) must be at least 50 years of age (unless the property is of “exceptional importance”) and possess significance in American history and culture, architecture, or archaeology. A property of potential significance must meet one or more of the following four established criteria (36 CFR Section 60.4):

- A. Associated with events that have made a significant contribution to the broad patterns of our history;
- B. Associated with the lives of persons significant in our past;
- C. Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. Yield, or may be likely to yield, information important in prehistory or history.

Context

To be eligible for listing in the National Register, a property must also be significant within a historic context. The National Park Service bulletin, *How to Apply the National Register Criteria for Evaluation* (previously known as “National Register Bulletin 15”), states that the significance of a historic property can be judged only when it is evaluated within its historic context. Historic contexts are “those patterns, themes, or trends in history by which a specific...property or site is understood and its meaning...is made clear” (CRM 2026). A property must represent an important aspect of the area’s history or prehistory and possess the requisite integrity to qualify for the National Register.

Integrity

In addition to possessing significance within a historic context, a property must have integrity to be eligible for listing in the National Register. Integrity is defined in *How to Apply the National Register Criteria for Evaluation* as “the ability of a property to convey its significance” (CRM 2026). Within the concept of integrity, the National Register recognizes seven aspects or qualities that in various combinations define integrity: feeling, association, workmanship, location, design, setting, and materials.

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- **Location** is the place where the historic property was constructed or the place where the historic event occurred.
- **Design** is the combination of elements that create the form, plan, space, structure, and style of a property.
- **Setting** is the physical environment of a historic property.
- **Materials** are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
- **Workmanship** is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
- **Feeling** is a property's expression of the aesthetic or historic sense of a particular period of time.
- **Association** is the direct link between an important historic event or person and a historic property. (CRM 2026)

Integrity is based on significance: why, where, and when a property is important. Thus, the significance of the property must be fully established before the integrity is analyzed.

Archaeological Resources Protection Act

The Archaeological Resources Protection Act (United States Code [USC] Title 16, Sections 470aa–mm) became law on October 31, 1979, and has been amended four times. It regulates the protection of archaeological resources and sites that are on federal and Native American lands.

Native American Graves Protection and Repatriation Act

NAGPRA is a federal law passed in 1990 that mandates museums and federal agencies to return certain Native American cultural items—such as human remains, funerary objects, sacred objects, or objects of cultural patrimony—to lineal descendants or culturally affiliated Indian tribes.

STATE

California Office of Historic Preservation

Following passage of the NHPA in 1966, states were tasked with creating a state agency to implement parts of the law at the state level. The California Office of Historic Preservation (OHP) was established in 1975 and is overseen by a governor-appointed State Historic

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Preservation Officer (SHPO). The governor also appoints members to the State Historic Resources Commission (SHRC) that have responsibilities in the identification, registration, and preservation of California's cultural heritage. The OHP and its staff maintain a statewide Historical Resources Inventory, provide local government assistance, participate in environmental compliance, and administer state-level registration programs, including the California Register.

California Register of Historical Resources

The California Register is an authoritative guide used by state and local agencies, private groups, and citizens to identify historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse impacts (PRC Section 5024.1[a]).

The California Register consists of properties that are listed automatically as well as those that must be nominated through an application and public hearing process. The California Register automatically includes:

- **California properties** listed in the National Register and those formally Determined Eligible for the National Register.
- **State Historical Landmarks** from No. 0770 onward.
- **California Points of Historical Interest** that have been evaluated by the SHPO and have been recommended to the SHRC for inclusion on the California Register. (PRC Section 5024.1[d])

Criteria and Integrity

For properties not automatically listed, the properties may be nominated to the SHRC for listing under various criteria. The criteria for eligibility of listing in the California Register are based on National Register criteria, but are identified as 1 through 4 instead of A through D. To be eligible for listing in the California Register, a property generally must be at least 50 years of age and must possess significance at the local, state, or national level, under one or more of the criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.
2. It is associated with the lives of persons important to local, California, or national history.
3. It embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master or possesses high artistic values.
4. It has yielded, or has the potential to yield, information important in the prehistory or history of the local area, California, or the nation. (California Code of Regulations [CCR] Title 14, Section 4852[b])

Properties eligible for listing in the California Register may include buildings, sites, structures, objects, and historic districts. It is possible that properties may not retain sufficient integrity to

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meet the criteria for listing in the National Register, but they may still be eligible for listing in the California Register. An altered property may still have sufficient integrity for the California Register if it maintains the potential to yield significant scientific or historical information or specific data (14 CCR Section 4852[c]).

A property less than 50 years of age may be eligible if it can be demonstrated that sufficient time has passed to understand its historical importance (14 CCR Section 4852[d][2]).

The California Register also includes properties identified in historical resource surveys provided that the survey meets all of the following criteria:

- The survey has been or will be included in the State Historical Resources Inventory.
- The survey and the survey documentation were prepared in accordance with OHP procedures and requirements.
- The resource is evaluated and determined by the OHP to have a California Historical Resource Status Code significance rating of Category 1 to 5 on a Department of Parks and Recreation (DPR) Form 523.
- If the survey is five or more years old at the time of its nomination for inclusion in the California Register, the survey is updated to identify historical resources that have become eligible or ineligible due to changed circumstances or further documentation and those that have been demolished or altered in a manner that substantially diminishes the significance of the resource. (PRC Section 5024.1)

California Environmental Quality Act

Historic Resources

CEQA (Public Resources Code Sections 21000 et seq.) was passed in 1970, establishing a process of reviewing projects for impacts to the environment, including historical resources. For the purposes of CEQA, a historical resource is generally a resource that is listed in or eligible for the California Register, meets the criteria for listing in the California Register, and/or is included on a local register (CEQA Guidelines Section 15064.5[a]).

In 1998, the California Legislature amended CEQA and enacted the California Register to clarify which properties are significant as well as which project impacts are considered significantly adverse. According to CEQA Section 21084.1, a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment. CEQA Guidelines Section 15064.5(b)(1) defines “substantial adverse change” in the significance of a historical resource, including significant archaeological resources, as physical demolition, destruction, relocation, or alteration of the resource or its

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immediate surroundings such that the significance of a historical resource is materially impaired. The significance of a built environment historical resource or significant archaeological resources is materially impaired when a project:

- Demolishes or materially alters in an adverse manner those physical characteristics of the resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register.
- Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register or historical resources pursuant to PRC Section 5020.1(k) or its identification in an historical resources survey meeting the requirements of PRC Section 5024.1(g), unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically significant.
- Demolishes or materially alters in an adverse manner those physical characteristics of the resource that convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a lead agency for the purposes of CEQA. (CEQA Guidelines Section 15064.5[b])

Archaeological Resources

CEQA Section 21083.2 and CEQA Guidelines Section 15126.4 specify lead agency responsibilities in determining whether a project may have a significant effect on archaeological resources. If it can be demonstrated that a project will damage a unique archaeological resource, the lead agency may require reasonable efforts for the resources to be preserved in place or left in an undisturbed state. Preservation in place is the preferred approach to mitigation. The PRC also details required mitigation if unique archaeological resources are not preserved in place. CEQA defines a unique archaeological resource as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information.
- Has a special and particular quality such as being the oldest of its type or the best available example of its type.
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

CEQA Guidelines Section 15064.5(e) requires that excavation activities stop whenever human remains are uncovered during a project or activity, and that the county coroner be called in to assess the remains. If the county coroner determines that the remains are Native American, the Native American Heritage Commission (NAHC) must be contacted within 24 hours. At that time,

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the lead agency must consult with the appropriate Native American descendants, if any, as identified by the NAHC. Under certain circumstances, the lead agency (or applicant), is required to develop an agreement with the Native American descendants for the treatment and disposition of the remains. In addition to the mitigating provisions pertaining to accidental discovery of human remains, CEQA Guidelines Section 15064.5(f) also requires that a lead agency make provisions for the accidental discovery of historical or archaeological resources. These provisions should include an immediate evaluation of the find by a qualified archaeologist. If the find is determined to be a Historical Resource or Unique Archaeological Resource, avoidance measures should be implemented, or appropriate mitigation should be available.

Historical Building Code

The California Historical Building Code (24 CCR Part 8) provides regulations for permitting repairs, alterations, and additions for the preservation, rehabilitation, relocation, reconstruction, change of use, or continued use of historical buildings, structures, and properties determined by any level of government as qualifying as a historical resource. A historical resource is defined in Sections 18950 to 18961 of Division 13, Part 2.7, of the Health and Safety Code, and is subject to rules and regulations in the California Historical Building Code.

Public Resources Code

PRC Section 5097.5(a) specifies that a person shall not knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, or archaeological sites, which can include fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands. In addition, PRC Section 5097.98 sets a procedure for handling and notification pertaining to the discovery of Native American human remains.

Health and Safety Code

Health and Safety Code Section 7050.5 requires that construction or excavation be stopped in the vicinity of discovered human remains until the County Coroner can determine whether the remains are those of a Native American. If the remains are determined to be Native American, the Coroner must contact the NAHC. Health and Safety Code Section 7052 regulates the disturbance of Native American cemeteries as a felony. This provision protects human remains and prohibits the disturbance or removal of human remains from any location other than a dedicated cemetery. The provision further identifies steps to follow in the event of accidental discovery or recognition of any human remains, directs the County Coroner to determine whether the remains are those of a Native American, and, if so, the coroner is required to contact the NAHC.

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LOCAL

Town of Paradise 1994 General Plan

The Paradise General Plan serves as the legal and policy foundation for all land use decisions within the Town of Paradise. It is a comprehensive expression of community values and long-term development goals, containing policy statements related to the distribution of future land uses across multiple elements, including land use, circulation, housing, noise, safety, open space/conservation/energy, and education and social services. Each element identifies issues, goals, objectives, policies, and specific implementation measures. The set of goals and policies listed is not an exhaustive list of all of the General Plan policies applicable to the proposed project; rather, it is a selection relevant to the impact discussion in this chapter.

Open Space/Natural Resource Conservation

Goals

- **OCEG-9:** Identify, record, preserve and protect historical and archaeological resources.

Policies

- **OCEP-13:** Existing large trees of historic and/or cultural significance should be protected to the best of the town's ability. Trees so identified should only be removed as a last resort.

Implementation Measures

- **OCEI-20:** Should any historic or pre-historic artifacts be discovered during construction, all work shall cease until a qualified professional archaeologist views the site, provides recommendations and gives clearance to continue.

Town of Paradise Code of Ordinances

The Paradise Code of Ordinances outlines the local laws and regulations governing land use, development, and environmental protection within the town. Among its provisions, the municipal code includes specific measures related to cultural resources.

- **Chapter 8.12:** provides guidance for the process to identify landmark trees and procedures for removing or felling landmark trees, as well as declassifying landmark trees.

3.5.2 Existing Conditions

This information is based on the Historical and Archaeological Report by CRM Tech (Appendix D), which provides a comprehensive overview of the town's historical and cultural

context, including known archaeological and paleontological resources and historic-era structures.

GENERAL SETTING

The project site is located in the central part of the Town of Paradise. The project site consists of Assessor Parcels Numbers (APNs) 053-111-015, 053-111-014, 053-111-028, 053-111-030, and 053-111-034. The project site is currently vacant and previously contained the First Assembly of God Church with associated parking lot and multiple residential structures that burned down during the 2018 Camp Fire. The project site is bounded by Maxwell Drive to the east, Elliot Road to the south, the Paradise HS campus to the north, and a residential property to the west. Surrounding land uses include other foothill communities, managed timberlands, and natural resource areas, placing Paradise within a largely wildland-urban interface that is regionally significant for wildfire risk, watershed protection, and recreation. (See Figure 2-1, *Regional Location*; Figure 2-2, *Local Vicinity*; and Figure 2-3, *Aerial Photograph*.)

PREHISTORIC CONTEXT

The earliest evidence of human occupation in the Cascade-Sierra Nevada uplift area dates to approximately 9000-6000 B.C., associated with the Western Pluvial Lakes Tradition. Archaeological sites that date to this period are usually found near pluvial lakes and marshes and have an absence of ground-stone artifacts, and they generally reflect a developed flaked-stone industry and a dependence on hunting (Appendix D).

In the early to mid-Holocene (ca. 6000 B.C.) the climate shifted, leading to warmer temperatures. It is during this period that archaeological evidence began to demonstrate occupation of the high country of the northern Sierra Nevada by Great Basin peoples, as seen through the Tahoe Reach (ca. 6000 B.C.) and Spooner (ca. 5000–2000 B.C.) cultural phases. Specific to the western slopes of the Sierra Nevada, there was a sequence of occupation that spanned approximately 3,000 years and has been divided into the Mesilla, Bidwell, Sweetwater, Oroville, and Historic Complexes (Appendix D).

- **Mesilla Complex (1000 B.C.–1 A.D.):** Native peoples of this complex likely occupied the foothills seasonally and used the atlatl and dart for hunting, as well as milling stones and bowl mortars to process foods. Artifacts found at sites include heavy basalt, slate, and chert projectile points, milling stones and mortars, charm stones, bone pins, spatulae, and Olive/la and Haliotis beads.
- **Bidwell Complex (1–800 A.D.):** This complex ushered in relatively permanent villages from which task groups would move out to collect freshwater mussels, process hard seeds and acorns, and hunt small game and deer. The native peoples continued to use large basalt and

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slate projectile points, with the addition of steatite vessels for cooking. Mortuary practices were characterized by burying the dead in flexed, dorsal, or lateral positions.

- **Sweetwater Complex (800–1500 A.D.):** Two sites that have been used to identify this complex featured steatite platters, bowls, cups, and tubular smoking pipes, along with Olivella bead and Haliotis ornament forms. Also included among the artifacts were small, lightweight projectile points of the Eastgate, Gunther Barbed, Rose, and Spring types. Mortuary practices were characterized by burials in extended to semi-extended positions.
- **Oroville Complex (1500 A.D.–epidemic of 1833):** This complex represents the protohistoric Maidu people. Defining artifacts include clamshell disk beads, incised bird bone tubes, gaming bones, and gorge hooks. Common structures erected during this period included large circular dance houses. Mortuary practices shifted to burying the dead tightly flexed on their sides. The Oroville Complex ended with the Historic Complex, from which there is a sparse material record of the abandonment of traditional settlements.

ETHNOHISTORIC CONTEXT

According to ethnohistorical scholarship, what is now Butte County is the traditional homeland of the Maidu, which means "person." The Maidu had three distinct groups—Northeastern Maidu, known as the Mountain Maidu; Northwestern Maidu, known as the Konkow; and Southern Maidu, known as the Nisenan. The town of Paradise is in Konkow territory. The name Konkow is an anglicized version of the native term *koyo-mkawi*, which means "meadow-land" (Appendix D).

The Mountain Maidu, Konkow, and Nisenan each had a distinct linguistic affiliation; however, they exhibited similar social organization. The settlement pattern of the Maidu consisted of village communities, which served as the only political organization. A village community consisted of about three to five adjacent villages and was considered an autonomous unit. The Konkow villages were usually situated high above the Feather, Yuba, and American Rivers on the ridge, partway down the side of the canyon, or on small flats on the crest of the ridge (Appendix D).

The resource procurement strategies of the Konkow followed a yearly gathering cycle. In the spring, they would go into the valleys to collect grass seeds, especially wild rye. The summer was the time when they would go into the mountains to hunt, and they would bring back dried deer meat for the winter months. Their diet was varied and consisted of seeds, acorns, digger pine nuts, wild mint tea, manzanita berry cider, various insects, fish, deer, elk, and small game (Appendix D).

HISTORIC CONTEXT

Europeans began arriving in the Konkow and Mountain Maidu territory around 1808, when Spanish explorer Gabriel Moraga reached the lower reaches of what is now known as the Feather River. The English name of the river came from the Spanish version, el Rio de las Plumas, which was bestowed on it in 1820 by Captain Luis A. Arguello. In the years following Arguello's expedition up the Feather River, the Konkow saw in their territory an increase of Euro-American fur trappers. From 1828 to 1836, Michel Laframboise and John Work, among others, led fur trapping expeditions for Hudson's Bay Company (Appendix D).

It was during this time, in 1833, that an epidemic, possibly measles, decimated the Konkow population. Ten years later, the Konkow experienced more devastation when they were shot at by members of an immigrant party, led by Lansford Hastings, that was making its way through Konkow territory to Sutter's Fort in present-day Sacramento. The following year, the Konkow experienced further encroachment on their land when Governor Manuel Micheltorena issued land grants in Konkow territory (Appendix D).

After the U.S. annexation of California in 1848 and, in particular, during the ensuing gold rush in the Sierra Nevada, an influx of thousands of fortune seekers overran even the most remote areas of the Maidu country. Along with the miners came Euro-American settlers with their livestock and farm-building aspirations, which upset the ecological balance of the Maidu. As their traditional food sources became scarce or even extinct, the Maidu, including the Konkow, killed livestock of Euro-American ranchers, which consequently led to retaliation and conflict. Although some Konkow worked as laborers at the mines, ranches, and farms, they were not paid enough to sustain themselves, and tensions grew (Appendix D).

In 1850, the Konkow signed a treaty with the U.S. government that would have let them keep part of their homeland, but the treaty was among a series of similar treaties with California Indians that the senate refused to ratify in 1852. In 1855, some of the Konkow were sent to the newly established Nome Lackee Reservation. However, their removal did not alleviate tensions that still existed between the Konkow who remained and the Euro-American settlers and miners who had invaded their territory, and in 1863, 461 Native Americans were marched to the Round Valley Reservation by mounted soldiers. This forced removal contributed to the declining Native American population. By 1910, an estimated 1,100 Maidu were living in the area, a sharp decline from just 64 years prior in 1846, when the population was estimated to be 8,000 (Appendix D).

While the Konkow were being driven from their homeland, the present-day Paradise area received the first Euro-American settlers in the mid-1850s, primarily former miners who did not strike it rich and subsequently became farmers. Around the turn of the century, settlers in the Paradise area began building the infrastructure to supply water for agriculture as well as domestic use. The irrigation system, coupled with the construction of the Butte County Railroad

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in 1902, accelerated the growth of the town. In the following years, agriculture flourished, especially fruticulture, and the products included pears, apples, plums, peaches, olives, nuts, prunes, grapes, red potatoes, and strawberries (Appendix D).

Agriculture and fruticulture, particularly apple orchards, continued to flourish in the Paradise area until the 1960s, with a population boom in the 1950s. Since then, with further population growth and the diversification of local economy, most of Paradise's once extensive orchard acreage has given way to suburban residential and commercial development. By the early 1980s, most of the orchards were gone and replaced by tracts of homes. Nevertheless, the town's agricultural-dominated past remains an important part of the community's identity and heritage, celebrated today with the annual Johnny Appleseed Days festival (Appendix D).

HISTORICAL AND ARCHAEOLOGICAL RESOURCES

Records Search

Northeast Information Center (NEIC) records indicated that the project site had not been surveyed systematically for cultural resources prior to this study, and no cultural resources had been identified within its boundaries. Within the one-mile scope of the records search, NEIC records identify 46 previous studies completed between 1977 and 2023. As a result of these and other similar studies in the vicinity, 18 cultural resources were previously recorded within the scope of the records search, including 16 sites and 2 isolates (i.e., localities with fewer than three artifacts).

Eight of the sites and both of the isolates were of prehistoric (i.e., Native American) origin, consisting predominantly of bedrock milling features along with scattered lithic artifacts. The other eight sites dated to the historic period and included five residential properties, a stone wall, a power transmission line, and the Paradise Depot on the Butte County Railroad. None of these recorded sites or isolates was found in the immediate vicinity of the project site. Therefore, they do not require further consideration.

Sacred Lands File Search

In response to a Sacred Lands File search, the NAHC stated in a letter dated December 19, 2025, that the Sacred Lands File identified no Native American cultural resources in the project vicinity but recommended that local Native American groups be consulted for further information.

Historical Research

According to historical maps, the present-day Paradise area had experienced much human activity at least by the 1860s, but the project site itself remained unsettled and undeveloped until the mid-20th century. In 1867, a number of human-made features were noted in the surrounding area, including settler Chipman's residence, Chipman's turpentine distillery,

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Anderson's sawmill, Thompson's Flat Ditch, and two roads identified as the Chico and Dogtown Road and the Dogtown and Oroville Road. None of these features were in the immediate vicinity of the project site. By 1886, the Town of Paradise had taken shape along what is now Clark Road, but the project site remained devoid of any notable human-made features at that time.

In the early post-WWII era, the Town of Paradise exhibited the characteristics of both a suburban and an agrarian community, with dense clusters of buildings interspersed with large expanses of orchard and cultivated farmlands. It was also during this period that three buildings of unknown nature were first noted on the project site, all of them in western portion. By 1960, the Christian and Missionary Alliance (CMA) Church had been constructed in the eastern portion of the project site, on the corner of Elliot Road and Maxwell Drive, and was providing services to the community.

In 1983, the CMA Church was in the process of designing and building a new home to the northeast of the project site. The congregation continued to hold services at this location until the following year, when the building was sold to the Paradise First Assembly of God. Between 1973 and 1984, additional buildings were constructed to the west of the church. However, all the buildings on the project site were destroyed in 2018 by the Camp Fire, along with many other buildings on the surrounding properties. Since then, the project site has remained vacant.

Field Survey

On December 17, 2025, a field survey was conducted for the project site. Throughout the course of the field survey, no features or artifacts dating to the prehistoric or early historic period were encountered on the project site. Field observations confirmed that all buildings that once stood on the project site had been removed after the 2018 Camp Fire, and none of them left any foundational remains. The remnants of the former church complex at the eastern end of the project site consist of a parking lot, an underground utility tank, sidewalks, and two depressions where the main church building and an annex building once stood. Just to the west of the parking lot were two modern double-wide modular buildings that were scheduled to be removed by December 2025. Further to the west, across the remainder of the project site, additional depressions marked the former locations of other buildings. No evidence of any substantial artifact deposits was noted on the ground surface on the project site.

3.5.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact on cultural resources if it would:

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- a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5.
- b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5.
- c) Disturb any human remains, including those interred outside of dedicated cemeteries.

METHODOLOGY

To determine the presence or absence of historical or archaeological resources on the project site, a review was conducted of the Town of Paradise General Plan, as well as relevant federal, state, and local databases, including the National Register of Historic Places and the California Register of Historical Resources. These sources were evaluated to assess whether the project site has been previously identified as containing or being eligible for historical or archaeological resources.

Terminology

The following defines terminology commonly referred to in this analysis:

- **Cultural Resource.** This term is used to describe several different types of properties: pre-contact (prehistoric) and historic archaeological sites, buildings, objects, structures, and districts or any other physical evidence associated with human activity considered important to a culture or a community for scientific, traditional, or religious reasons.
- **Historic Property.** Federal regulations (Title 36 Code of Federal Regulations [CFR] Section 800) define a historic property as any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places (National Register). This term includes artifacts, records, and remains that are related to and located within such properties. The term also includes properties of traditional religious and cultural importance to Native American tribes or Native Hawaiian organizations and that meet National Register criteria.
- **Historical Resource.** CEQA Guidelines Section 15064.5(a) defines a historical resource as a resource listed in the California Register of Historical Resources (California Register) or determined to be eligible for listing in the California Register by the State Historical Resources Commission (SHRC), a resource included in a local register of Historical Resources, or identified as significant in a Historical Resource survey meeting the requirements of Public Resources Code (PRC) Section 5024.1(g), or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant or

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significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California.

- **Unique Archaeological Resource.** CEQA defines this term as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:
 - Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information.
 - Has a special and particular quality, such as being the oldest of its type or the best available example of its type.
 - Is directly associated with a scientifically recognized important prehistoric or historic event or person.
- **Tribal Cultural Resources.** CEQA defines tribal cultural resources (TCRs) as a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American tribe, which may include nonunique archaeological resources previously subject to limited review under CEQA.

3.5.4 Project Impact Analysis

a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?

Section 15064.5 defines historic resources as resources listed or determined to be eligible for listing by the State Historical Resources Commission, a local register of historical resources, or the lead agency. Generally, a resource is considered “historically significant” if it meets one of the following criteria:

- i) Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
- ii) Is associated with the lives of persons important in our past;
- iii) Embodies the distinctive characteristics of a type, period, region or method of construction, or represents the work of an important creative individual, or possesses high artistic values;
- iv) Has yielded, or may be likely to yield, information important in prehistory or history.

The project site has been developed previously and is located within a developed area. A cultural resources records search, Native American Sacred Lands File search, and historical background research were carried out as well as an intensive-level field survey. The field survey

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yielded negative results for potential historical resources, and no buildings, structures, objects, features, or artifact deposits of prehistoric or historical origin were observed within the project site boundaries. While a church and other buildings associated with the Christian and Missionary Alliance and, later, the Paradise First Assembly of God are known to have been located in the project site between the 1950s and the 2010s, they were destroyed by the 2018 Camp Fire and are no longer extant. With the removal of the buildings, the surviving parking lot and depressions marking former building locations retain no historic integrity to relate to any persons or events in the history of the church, nor do they exhibit any architectural or aesthetic merits or hold the promise for any important historic/archaeological data. As such, the remnants of the church have little potential for historic significance according to the California Register criteria. Additionally, the project site is not listed or eligible for listing in the California Register of Historical Resources, National Register of Historic Places, California State Historical Landmarks or Points of Historical Interest, or in a local register of historical resources (NPS 2026a, 2026b; OHP 2026a, 2026b).

The Historical/Archaeological Resources Survey Report did not encounter any historical resources within or adjacent to the project site. No further cultural resources investigation is recommended for the project unless construction plans undergo such changes as to include areas not covered by the study in Appendix D. Therefore, the project site is not historically significant and does not contain historic structures, and a **less than significant** impact would occur.

Significance without Mitigation: Less than significant.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?

The project site has been developed prior and is located within a developed area. The proposed project would include excavation and grading, which has the potential to uncover previously unknown archaeological resources. No archaeological resources were previously recorded within or adjacent to the project boundaries. However, if buried cultural materials could be discovered during earth-moving operations associated with the project. Therefore, this impact would be considered **potentially significant**.

Significance without Mitigation: Potentially significant.

Impact CUL-1: Project development would cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5.

Mitigation Measure CUL-1: If cultural resources are encountered during ground-disturbing activities, work in the immediate area shall cease, and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for

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archaeology (NPS 1983) shall be contacted immediately to evaluate the find(s), and an on-site archaeologist monitor shall oversee the remaining earthmoving activities. If the discovery proves to be significant under California Environmental Quality Act, additional work such as data recovery excavation may be warranted and will be reported to the Paradise Unified School District.

Implementation of Mitigation Measure CUL-1 would require that if any evidence of cultural resources is discovered, all work within the vicinity of the find will stop until a qualified archaeological consultant can assess the find and make recommendations. Therefore, impacts to archaeological resources would be reduced to a **less than significant impact**.

Significance with Mitigation: Less than significant.

c) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

During construction of the previous development and again during construction of the school, extensive earthwork (excavation and grading) occurred. The project site is currently vacant and previously contained the Christian and Missionary Alliance and, later, the Paradise First Assembly of God with associated parking lot and multiple residential structures. All structures burned down during the 2018 Camp Fire, and human remains are not anticipated. In the unlikely event that human remains are uncovered during grading or excavation, California Government Code Sections 27460 et seq. mandate that there shall be no further excavation or soil disturbance until the Butte County Coroner has determined that the remains are not subject to the provisions of Section 27491 of the California Government Code or any other related provisions of law concerning investigation of the circumstances, manner, and cause of death, and the required recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in PRC Section 5097.98.

Pursuant to California Health and Safety Code Section 7050.5, the coroner shall make his or her determination within two working days of notification of the discovery of the human remains. If the coroner determines that the remains are not subject to his or her authority and recognizes or has reason to believe that they are those of a Native American, he or she shall contact the Native American Heritage Commission within 24 hours.

Although soil-disturbing activities associated with the proposed project could result in the discovery of human remains, compliance with existing law would ensure that impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

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3.5.5 Cumulative Impact Analysis

Would the project have a cumulative effect related to cultural resources?

As defined in Section 15130 of the State CEQA Guidelines, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects within the cumulative impact area for utilities and services. The study area for the assessment of cumulative impacts related to cultural resources is the Paradise HS campus. There are currently no other projects proposed within the campus.

Development of the proposed project and related projects have the potential to encounter and potentially degrade historic resources and cultural resources. However, similar to the proposed project, each related project would be expected to comply with PRC Section 15064.5, perform site-specific cultural analyses, implement mitigation measures if needed, and comply with other applicable regulatory compliance measures. The proposed project would not result in an adverse change in the significance of a historical resource. The project site does not contain known archeological resources or human remains. However, because the proposed project would conduct ground-disturbing activities, the proposed project would require a mitigation measure to minimize its impact to potential archeological materials to a less than significant level and reduce the potential for the project to contribute to cumulative impacts to cultural resources. No other projects are currently planned for the project site.

Overall, the proposed project would not introduce new uses to the campus and would not significantly alter the campus. Minimal construction activities are proposed that would not result in substantial changes to the campus compared to existing conditions. Therefore, the proposed project would not have a cumulative effect related to cultural resources and would be **less than significant**.

Significance without Mitigation: Less than significant.

3.5.6 References

CRM Tech. 2026, February. Historical/Archaeological Resources Survey Report: Paradise USD Agricultural Building and Parking Lot Project, Town of Paradise, Butte County, California. (Appendix D)

NPS (National Park Service). 2026a, March 23 (accessed). National Register of Historic Places. <https://www.nps.gov/subjects/nationalregister/database-research.htm#table>.

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3.6 GEOLOGY AND SOILS

This section of the Draft Environmental Impact Report (DEIR) evaluates the Paradise High School Expansion Project's (proposed project) potential impacts on geological and soil resources related to seismic activity, paleontological resources, or unique geological features. The analysis in this section is based in part on the existing conditions of the current Paradise High School campus (Paradise HS or campus) and architectural renderings prepared for the proposed project.

During the Notice of Preparation (NOP) public review period, no comments were received regarding potential public service impacts associated with the proposed project. The NOP is included as Appendix A of this DEIR.

3.6.1 Regulatory Framework

FEDERAL

There are no federal regulations directly applicable to the geotechnical conditions at the proposed project site. Nonetheless, installations of any underground utility lines are required to comply with industry standards specific to the type of utility (National Clay Pipe Institute for sewers; American Water Works Association for water lines, etc.), and the discharge of contaminants is required to be controlled through the National Pollutant Discharge Elimination System (NPDES) permitting program for management of construction and municipal stormwater runoff. These standards contain specifications for installation, design, and maintenance to reflect site-specific geotechnical conditions.

Clean Water Act

Under the Clean Water Act (CWA) of 1977, the United States Environmental Protection Agency (EPA) seeks to restore and maintain the chemical, physical, and biological integrity of the nation's waters. The statute employs a variety of regulatory and nonregulatory tools to reduce direct pollutant discharges into waterways, finance municipal wastewater treatment facilities, and manage polluted runoff. The CWA authorizes the EPA to implement water quality regulations. Please see Section 5.8, *Hydrology and Water Quality*, of this Draft EIR for more detail.

National Pollution Discharge Elimination System

The NPDES permit program was established by the CWA to regulate municipal and industrial discharges to surface waters of the United States from their municipal separate storm sewer systems.

3.6 GEOLOGY AND SOILS

Paleontological Resources Preservation Act

The federal Paleontological Resources Preservation Act of 2002 limits the collection of vertebrate fossils and other rare and scientifically significant fossils to qualified researchers who have obtained a permit from the appropriate state or federal agency. These researchers must agree to donate any materials recovered to recognized public institutions where they will remain accessible to the public and other researchers. The act incorporates key findings of a report, “Fossils on Federal Land and Indian Lands,” issued by the Secretary of the Interior in 2000, which establishes that most vertebrate fossils and some invertebrate and plant fossils are considered rare resources.

Preservation of American Antiquities

The Federal Antiquities Act of 1906 was enacted with the primary goal of protecting cultural resources in the United States. It explicitly prohibits appropriation, excavation, injury, and destruction of any “historic or prehistoric ruin or monument, or any object of antiquity” on lands owned or controlled by the federal government without permission of the secretary of the federal department with jurisdiction. It also established criminal penalties for these acts, including fines and/or imprisonment. Neither the Antiquities Act itself nor its implementing regulations specifically mention paleontological resources. However, several federal agencies—including the National Park Service, the Bureau of Land Management, and the US Forest Service—have interpreted objects of antiquity to include fossils. Consequently, the Antiquities Act also represents an early cornerstone for efforts to protect the nation’s paleontological resources.

STATE

California Alquist-Priolo Earthquake Fault Zoning Act

The California Alquist-Priolo Earthquake Fault Zoning Act was signed into state law in 1972, and amended, with its primary purpose being to mitigate the hazard of fault rupture by prohibiting the location of structures for human occupancy across the trace of an active fault. This state law was a direct result of the 1971 San Fernando Earthquake, which was associated with extensive surface fault ruptures that damaged numerous homes, commercial buildings, and other structures. The act requires the State Geologist of the California Geologic Survey to delineate regulatory zones known as “earthquake fault zones” along faults that are “sufficiently active” and “well defined” and to issue and distribute appropriate maps to all affected cities, counties, and state agencies for their use in planning and controlling new or renewed construction. Pursuant to this act and as stipulated in the California Code of Regulations (CCR), Title 14, Section 3603(a), structures for human occupancy are not permitted to be placed across the trace of an active fault. The act also prohibits structures for human occupancy within 50 feet of the trace of an active fault, unless proven by an appropriate geotechnical investigation and report that the development site is not underlain by active branches of the active fault, as

stipulated in 14 CCR Section 3603(a). Furthermore, the act requires that cities and counties withhold development permits for sites within an earthquake fault zone until geologic investigations demonstrate that the sites are not threatened by surface displacement from future faulting, as stipulated in 14 CCR Section 3603(d).

Seismic Hazard Mapping Act

The Seismic Hazard Mapping Act was adopted by the state in 1990 to protect the public from the effects of earthquake hazards other than surface fault rupture, such as strong ground shaking, liquefaction, seismically induced landslides, or other ground failure. The goal of the act is to minimize loss of life and property by identifying and mitigating seismic hazards. The California Geologic Survey prepares and provides local governments with seismic hazard zone maps that identify areas susceptible to amplified shaking, liquefaction, earthquake-induced landslides, and other ground failures. Section 2697(a) of the Act states that “cities and counties shall require, prior to the approval of a project located in a seismic hazard zone, a geotechnical report defining and delineating any seismic hazard.”

Sustainable Groundwater Management Act

The Sustainable Groundwater Management Act was adopted by the state in 2014 to establish a statewide framework to help protect groundwater resources over the long term. The act established a priority framework for all 515 groundwater basins in California, categorizing them into very low, low, medium, and high priority based on eight components. The act requires local agencies to form groundwater sustainability agencies for the high and medium priority basins. These agencies develop and implement groundwater sustainability plans to avoid undesirable results and mitigate overdraft within 20 years.

California Building Code

Current law states that every local agency enforcing building regulations, such as cities and counties, must adopt the provisions of the California Building Code (CBC) within 180 days of its publication. The publication date of the CBC is established by the California Building Standards Commission, and the code is under Title 24, Part 2, of the CCR. The CBC provides minimum standards to protect property and public safety by regulating the design and construction of excavations, foundations, building frames, retaining walls, and other building elements to mitigate the effects of seismic shaking and adverse soil conditions. The CBC contains provisions for earthquake safety based on factors including occupancy type, the types of soil and rock on-site, and the strength of ground shaking with a specified probability at a site.

Soils Investigation Requirements

Requirements for soils investigations for new construction are in California Health and Safety Code Sections 17953 to 17955 and in Section 1803 of the California Building Code. Testing of samples from subsurface investigations is required, such as from borings or test pits. Studies

3.6 GEOLOGY AND SOILS

must be done as needed to evaluate slope stability, soil strength, position and adequacy of load-bearing soils, the effect of moisture variation on load-bearing capacity, compressibility, liquefaction, differential settlement, and expansiveness, which are included as part of the geotechnical evaluation required by the California Building Code.

California Public Resources Code

Paleontological sites are protected under a wide variety of state policies and regulations in the California Public Resources Code (PRC). In addition, paleontological resources are recognized as nonrenewable resources and receive protection under the PRC and CEQA. PRC Division 5, Chapter 1.7, Section 5097.5, and Division 20, Chapter 3, Section 30244 state:

No person shall knowingly and willfully excavate upon, or remove, destroy, injure or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands. Violation of this section is a misdemeanor.

This statute prohibits the removal, without permission, of any paleontological site or feature from lands under the jurisdiction of the state or any city, county, district, authority, or public corporation, or any agency thereof. As a result, local agencies are required to comply with PRC 5097.5 for their own activities, including construction and maintenance, as well as for permit actions (e.g., encroachment permits) undertaken by others. PRC Section 5097.5 establishes the removal of paleontological resources as a misdemeanor and requires reasonable mitigation of adverse impacts to paleontological resources from developments on public (state, county, city, and district) lands.

Statewide General Construction Permit

Construction projects of one acre or more are regulated under the General Construction Permit, Order No. 2012-0006-DWQ, issued by the State Water Resources Control Board in 2012. Projects obtain coverage by developing and implementing a Stormwater Pollution Prevention Plan estimating sediment risk from construction activities to receiving waters and specifying best management practices (BMP) that would be used by the project to minimize pollution of stormwater.

LOCAL

2024 Butte County Local Hazard Mitigation Plan

The purpose of this 2024 Butte County Local Hazard Mitigation Plan (LHMP) Update and hazard mitigation planning process is to reduce or eliminate long-term risk to people and property,

critical facilities and infrastructure, natural and historic and cultural resources, and other community assets from future hazard events and natural disasters. The Butte County Planning Area is vulnerable to numerous hazards that are identified, profiled, and analyzed in this 2024 LHMP Update. Wildfires, floods, earthquakes, drought, dam failure, and other severe weather events are among the hazards that can have a significant impact on the Planning Area.

Town of Paradise 1994 General Plan

The Paradise General Plan serves as the legal and policy foundation for all land use decisions within the Town of Paradise. It is a comprehensive expression of community values and long-term development goals, containing policy statements related to the distribution of future land uses across multiple elements, including land use, circulation, housing, noise, safety, open space/conservation/energy, and education and social services. Each element identifies issues, goals, objectives, policies, and specific implementation measures. The set of goals and policies listed is not an exhaustive list of all of the General Plan policies applicable to the proposed project; rather, it is a selection relevant to the impact discussion in this chapter.

- **Policy SP-15.** Development projects should be designed to minimize soil erosion, and shall be required to comply with all Town of Paradise-adopted soil erosion standards maintained by the Paradise Community Development Department.

Town of Paradise Code of Ordinances

The Paradise Code of Ordinances outlines the local laws and regulations governing land use, development, and environmental protection within the town. Among its provisions, the municipal code includes specific measures related to geology and soils.

- **Chapter 8.26:** Establishes the “Stormwater Quality Management Ordinance” and includes the Erosion and Sediment Control Plan.

3.6.2 Existing Conditions

GEOLOGIC SETTING

Regional Geologic

The project site is located in the Town of Paradise, within Butte County in the northern portion of the Sacramento Valley, near the western foothills of the Sierra Nevada. The region is characterized by a transition from relatively flat alluvial valley deposits to more complex volcanic and metamorphic foothill formations.

Underlying geologic materials in the Paradise area typically consist of volcanic deposits associated with the Tuscan Formation, including tuff breccia, lahars, and volcanic mudflows.

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These materials are often moderately consolidated and may exhibit variable strength and permeability characteristics.

Local Geology

The project site is developed as part of the existing Paradise High School campus. Site conditions are characterized by previously disturbed soil and areas of existing pavement. The project would include removal of 69,496 square feet of existing pavement, indicating prior grading and compaction activities. Near-surface soils in the project area generally consist of sandy loams and clay loams derived from volcanic parent material. These soils may exhibit moderate expansion potential depending on clay content and moisture conditions.

SEISMIC SETTING

Regional Faulting

There are a number of faults within Butte County and several regional faults that could be considered potentially active. Active faults in or near the Town of Paradise are:

- The Beaver Creek Fault is approximately 9.5 miles north of the project site (DOC 2026b).
- The Cohasset Ridge Fault is approximately 8.8 miles north of the project site (DOC 2026b).
- The Chico Monocline Fault is approximately 8.1 miles west of the project site (DOC 2026b).

Since earthquakes are regional events, the whole of the Town is at risk to earthquake. Paradise, Butte County, and surrounding areas have some measure of risk from significant seismic and geologic hazards. A significant seismic event on any of these major faults could cause serious damage in Paradise.

The project site is not located within a currently designated Alquist-Priolo Earthquake Fault Zone. However, regional seismicity is influenced by nearby active fault systems in Northern California. Ground shaking from regional earthquakes represents the most likely seismic hazard affecting the site.

Fault Rupture

No known active faults traverse the project site. The nearest mapped active fault is the Chico Monocline Fault, which is approximately 8.1 miles west of the project site. However, strong ground shaking could occur during a seismic event on regional faults. Ground shaking intensity at the site would depend on earthquake magnitude, distance from the fault rupture, and local soil conditions. Volcanic-derived soils in the area may amplify seismic waves under certain conditions.

Seismic Shaking

Ground shaking is the surface motion generated by seismic waves during an earthquake and is the primary cause of structural damage. The intensity of ground shaking at a given location depends on several factors, including earthquake magnitude, distance from the seismic source, local soil conditions, and structural characteristics. Seismic waves propagating through the Earth's crust produce the ground vibrations felt during earthquakes, and shaking typically accounts for the majority of earthquake-related losses.

Although the Town of Paradise is located in a region of relatively low historical seismic activity, seismic ground shaking is expected throughout California due to the statewide distribution of seismic sources. Regional earthquakes can generate moderate ground shaking in the area, even in the absence of nearby major active faults. Seismic hazard mapping indicates that Butte County and the Town of Paradise are subject to a low to moderate seismic shaking hazard.

Liquefaction

Liquefaction refers to loose, saturated sand or gravel deposits that lose their load-supporting capability when subjected to intense shaking. Liquefaction potential varies based on three main contributing factors:

- Cohesionless, granular soils having relatively low densities (usually of Holocene age).
- Shallow groundwater (generally less than 50 feet).
- Moderate to high seismic ground shaking.

Cohesionless and granular soils are sand or gravel, typically with little or no clay content. Soil liquefaction generally occurs in submerged granular soils and non-plastic silts during strong ground shaking.

Based on 2024 Butte County LHMP, the Town of Paradise has a low potential for liquefaction and is not located in an area identified as having a high liquefaction potential. The relatively elevated topography and likely presence of moderately dense volcanic soils reduce susceptibility. However, localized areas of loose or saturated soil could present a low to moderate liquefaction risk.

GEOLOGIC HAZARDS

Landslides

Landslides occur when earth on slopes become destabilized, typically after heavy rains, when the precipitation saturates the soil and makes it less stable, or when significant erosion from rainfall destabilizes the ground. Slopes that have recently burned face a greater risk from rain-

3.6 GEOLOGY AND SOILS

induced landslides, as the fires burn up many of the trees, brush, and other vegetation that help stabilize the earth.

The project site is relatively flat and located within a developed campus. Additionally, the surrounding Paradise area includes sloping terrain. However, to the US Geological Survey United States Landslide Inventory and Susceptibility map, the project site is not within an identified landslide susceptibility zone (USGS 2026a). Therefore, the potential for landslides or slope failure is considered low.

Subsidence

Subsidence occurs when the level of the ground decreases, as if the surface is sinking. Subsidence can either be sudden (as in a sinkhole) or happen gradually overtime. It can be caused by mining, groundwater pumping, or fossil fuel extraction, creating empty underground spaces that can collapse and cause the soil above to drop. Erosion, natural cave collapses, and seismic activity can also cause subsidence.

The primary cause of subsidence in Butte County is groundwater withdrawal. However, areas of potential subsidence in the county are confined to the valley floor and include local areas of heavy groundwater withdrawal and several producing gas fields. These areas are illustrated in Figure HS-10 of the Butte County Health and Safety Element, and the areas with the greatest subsidence potential extend about two miles north and south of Chico and in a one-mile radius around Gridley (Butte County 2023). Therefore, it is reasonable to assume that the potential for ground subsidence within the study area is low.

Erosion and Topsoil

Erosion is a normal and inevitable geologic process whereby earthen materials are loosened, worn away, decomposed, or dissolved; removed from one place; and transported to another. Precipitation, running water, and wind are all agents of erosion. Ordinarily, erosion proceeds imperceptibly, but when the natural equilibrium of the environment is changed, the rate of erosion can be greatly accelerated. Accelerated erosion in a developed area can cause damage by undermining structures; blocking storm drains; and depositing silt, sand, or mud on roads and in tunnels. Eroded materials can eventually be deposited in local waters, where the carried silt remains suspended in the water for some time, constituting a pollutant and altering the normal balance of plant and animal life.

Erosion can occur when rainfall or other sources result in the placement of a significant amount of water on a sloping, bare-earth surface. Eroded soil can cause damage if they enter a waterway or a storm drain facility that deposits the collected water and entrained sediment into bodies of water. Construction activities, including pavement removal and grading, could expose soils to erosion from wind and water. The site's existing development reduces current erosion

risk; however, temporary construction-related erosion could occur without appropriate control measures.

PALEONTOLOGICAL SETTING

Paleontological resources are fossils, or recognizable remains or evidence of past life on Earth, including bones, shells, leaves, tracks, burrows, and impressions. Paleontological resources are generally found within sedimentary rock formations.

The geologic composition of the Town reflects a history of volcanism, tectonic uplift, periods of marine inundation, and erosional and depositional forces which have shaped the current character and distribution of the regional terrestrial strata (Paradise 1994). Records from the University of California Museum of Paleontology (UCMP) database, the PaleoBiology Database, were reviewed for fossil records near the project site. The UCMP database did not report any fossil localities at or near the project site (UCMP 2026).

3.6.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, “Environmental Checklist Form,” of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact related to geology if it would:

- a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. (Refer to Division of Mines and Geology Special Publication 42.)
 - ii) Strong seismic ground shaking.
 - iii) Seismic-related ground failure, including liquefaction.
 - iv) Landslides.
- b) Result in substantial soil erosion or the loss of topsoil.
- c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.

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- d) Be located on expansive soil, as defined in Table 18-1B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.
- e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.
- f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

METHODOLOGY

To evaluate the potential for geological hazards or paleontological resources on the project site, a review was conducted of the Town of Paradise 1994 General Plan and the Butte County General Plan, along with relevant federal, state, and local databases, including those maintained by the California Department of Conservation, the U.S. Department of Agriculture, and the U.S. Geological Survey. These sources were reviewed to assess whether the site is subject to geologic hazards or may contain paleontological resources.

3.6.4 Project Impact Analysis

-
- a) **Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:**
 - i) **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42.)**
 - ii) **Strong seismic ground shaking?**
 - iii) **Seismic-related ground failure, including liquefaction?**
 - iv) **Landslides?**
-

FAULT RUPTURE

An active fault, for the purposes of the Alquist-Priolo Act, is one that has ruptured in the last 11,000 years (DOC 2026a). Based on the California Department of Conservation fault activity map of California, the proposed project site is not within an Alquist-Priolo Earthquake Fault Zone for fault rupture hazard (DOC 2026b). The closest Alquist-Priolo Earthquake Fault Zone, the Cohasset Ridge Fault is approximately 8.1 miles west of the project site. The project site does not lie on or near a fault rupture hazard zone. Therefore, **no impact** would occur.

SEISMIC SHAKING

The project site is not located within an established Alquist-Priolo Earthquake Fault Zone (DOC 2026b). However, the project site, like most areas in California, is subject to ground movement associated with earthquakes along the active faults. According to the Paradise General Plan, the town does not have any known earthquake faults but encompasses several regional active fault zones (Paradise 1994). The degree of ground shaking and earthquake-induced damage is dependent on multiple factors, such as distances to causative faults, earthquake magnitudes, and expected ground accelerations. No active faults are within Paradise, and the closest Alquist-Priolo Earthquake Fault Zone is approximately 8.1 miles west of the project site (DOC 2026b). The proposed project would be required to comply with the seismic design parameters of the CBC, which regulates all building and construction projects and implements a minimum standard for building design and construction that includes specific requirements for seismic safety, evacuation, foundations, retaining walls, and site demolition. Additionally, the DSA would be required to review and approve the project plans, which would ensure that the structures are sufficiently designed to withstand ground shaking. Therefore, impacts would be **less than significant**.

LIQUEFACTION

Liquefaction refers to loose, saturated sand, or gravel deposits that lose their load-supporting capability when subjected to intense shaking. Liquefaction potential varies based on five main contributing factors: 1) Groundwater depth; 2) Soil type; 3) Relative density; 4) Initial confining pressure; and 5) Intensity and duration of ground shaking. According to the California Department of Conservation Liquefaction Zones Mapper, the proposed project is not within an identified liquefaction zone nor in the vicinity of such a zone (DOC 2022). The 2024 Butte County LHMP states that the town has a low potential for liquefaction (Butte County 2024). Additionally, the proposed project would be designed and constructed to withstand liquefaction potential consistent with CBC and DSA review, which would ensure that impacts related to liquefaction would be reduced to less than significant. Therefore, impacts related to liquefaction would be reduced to **less than significant**.

LANDSLIDES

The project site is currently vacant and previously contained the First Assembly of God Church with associated parking lot and multiple residential structures, which burned down during the 2018 Camp Fire. The project site and surrounding area are nearly flat, with a slight slope from east to west. According to the US Geological Survey United States Landslide Inventory and Susceptibility map, the project site is not within an identified landslide susceptibility zone (USGS 2026a). The 2024 Butte County Local Hazard Mitigation Plan identifies the Town as having an unlikely future occurrence for landslides (Butte County 2024). No portion of the proposed development would increase the risk of landslides. Therefore, impacts related to landslides are **less than significant**.

3.6 GEOLOGY AND SOILS

Significance without Mitigation: Less than significant.

b) Would the project result in substantial soil erosion or the loss of topsoil?

The project site contains nearly flat terrain, which decreases the project's potential to accelerate erosion. The project site is currently vacant and previously contained the First Assembly of God Church with associated parking lot and multiple residential structures, which burned down during the 2018 Camp Fire. Implementation of the proposed project would require earthwork, which includes grading for proper base of the proposed barn and stadium/practice field and paving for the proposed parking lot and driveway. The proposed project would not include the demolition of any structures or buildings. However, the proposed project would include the removal of approximately 69,496 sq. ft. of pavement of the project site.

The proposed project does not contain any subterranean levels and would not require extensive excavation, which could expose more soil to erosion. The development of the proposed project could result in short-term impacts to soils. Long term soil erosion and loss of topsoil are not expected from the construction of the development; however, soil erosion and loss of topsoil can potentially result during the short-term construction activities required to establish new property uses.

In addition, because the proposed project encompasses an area of more than one acre, the proposed project would be subject to the NPDES permit requirements. These include the preparation of a Storm Water Pollution Prevention Plan (SWPPP), including a BMP program to address construction-related discharges. The SWPPP for the proposed project would describe construction best practices for erosion control at the site. Adherence with existing state and local laws regulating construction activities would minimize soil erosion which would include the provisions of the CBC. Therefore, the proposed project would not result in substantial soil erosion or loss of topsoil, and impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

c) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

As discussed above, in Impact Discussion (a), the project site is not in a liquefaction zone or a landslide zone. Lateral spreading is a type of liquefaction-induced ground failure associated with the lateral displacement of surficial blocks of sediment resulting from liquefaction in a subsurface layer. Once liquefaction transforms the subsurface layer into a fluid mass, gravity plus the earthquake inertial forces may cause the mass to move downslope toward a free face (such as a river channel or an embankment). Lateral spreading may cause large horizontal displacements, and such movement typically damages pipelines, utilities, bridges, and

3.6 GEOLOGY AND SOILS

structures. Due to the project site not being in an identified liquefaction zone, the potential for lateral spreading is considered low (Caltrans 2020).

According to the United States Geological Survey Areas of Land Subsidence in California, the project site is not within an area subject to subsidence (USGS 2026b). The collapse of soils occurs with (1) an open, partially unstable, partially saturated fabric; (2) sufficient total stress to make the soil structure metastable; (3) the presence of a bonding agent or sufficient soil suction to stabilize the soil in the metastable condition; and (4) the addition of water, which reduces soil suction or softens/destroys the bonding agent, thereby causing shear failures at the inter-aggregate or inter-particle contacts (Caltrans 2024). As discussed above, in Impact Discussion (a), the proposed project would be designed and constructed to withstand landslide, liquefaction, lateral spreading, subsidence, liquefaction, or collapse potential. With adherence to the CBC and with DSA's review, the proposed project would not result in or contribute to on- or off-site impacts. Therefore, impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

d) Would the project be located on expansive soil, as defined in Table 18-1B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Expansive soils contain certain types of clay minerals that shrink when they dry out and swell when soils become wet, resulting in the potential for cracking building foundations and in some cases, structural distress of the buildings themselves. According to Websoil survey, the project site is primarily located within Paradiso Loam, 2 to 15 percent slopes. Paradiso Loam is a well-drained, volcanic soil that has no frequency of flooding (USDA 2026). Therefore, impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

The project is currently served by a septic system. Currently, four on-site wastewater treatment systems exist on the project site, and each of these systems services different areas on the project site. These wastewater systems consist of septic tanks, and leach fields (Appendix E). The proposed project would install an additional septic tank on-site for the proposed agricultural building. Wastewater generated from the agricultural building would consist of wash water produced during the hosing and cleaning of the livestock stalls. The proposed project would not substantially increase wastewater flows, and the new septic tank installed would be designed, sited, and permitted in accordance with applicable county environmental health regulations to ensure suitability with existing soil conditions. In addition, the proposed

3.6 GEOLOGY AND SOILS

project does not propose development in areas with known soil limitations that would impair the function of septic tanks or leach fields, because septic tanks have previously been installed on-site. Compliance with applicable design and permitting requirements would ensure that the septic systems function properly and that adverse effects related to soil conditions would not occur. Therefore, **less than significant** impacts would result from soil conditions in relation to septic tanks or other on-site water disposal systems.

Significance without Mitigation: Less than significant.

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

A paleontological resource is a natural resource characterized as faunal or floral fossilized remains but may also include specimens of non-fossil material dating to any period preceding human occupation. A significant impact would occur if ground-disturbing activities (e.g., grading, excavation) associated with project construction would disturb, damage, or destroy previously unknown buried paleontological features and deposits that could be considered significant resources.

Construction activities would require surficial grading and minimal excavation over the project site. The project site had previously been developed; however, though paleontological resources are not expected to be discovered during project construction, it is possible that unknown paleontological resources could be discovered during grading activities for the proposed project. Without mitigation, this impact is **potentially significant**.

Significance without Mitigation: Potentially significant.

Impact GEO-1: Construction of the proposed project could encounter unique paleontological resources during ground-disturbing activities.

Mitigation Measure GEO-1: In the event that fossils or fossil locality deposits are discovered during construction, excavations within 50 feet of the fossil locality shall be temporarily halted until removal of the fossil localities. The contractor shall notify a qualified paleontologist to investigate its significance. If the fossil locality is determined to be significant by the qualified paleontologist, the paleontologist shall work with the District to follow accepted professional standards such as further testing for evaluation or data recovery, as necessary. The paleontologist shall notify the appropriate agencies to determine procedures that would be followed before construction. Paleontological resources or fossils are remains of ancient plants and animals that can provide scientifically significant information about the history of life on earth. This sensitivity is determined by rock type, history of the geologic unit in producing significant fossils, and fossil localities that are recorded from that unit. Though paleontological resources are

not expected to be discovered during project construction, it is possible that unknown paleontological resources could be discovered during grading activities and utility trenching for a proper base and slope for the proposed project. Implementation of Mitigation Measure GEO-1 would ensure that impacts to unknown paleontological resources are less than significant. is allowed to resume at the location of the find. If the project proponent determines that avoidance is not feasible, the paleontologist shall prepare an excavation plan for mitigating the effect of the project based on the qualities that make the resource important.

Significance with Mitigation: Less than significant.

3.6.5 Cumulative Impact Analysis

Would the project have a cumulative effect related to geological resources?

As defined in Section 15130 of the State CEQA Guidelines, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects within the cumulative impact area for utilities and services. The study area for the assessment of cumulative impacts related to utilities and services is the Paradise HS campus. There are currently no other projects proposed within the campus.

Geologic and paleontological impacts related to the proposed project would be specific to the Paradise HS campus and would not combine to result in cumulative impacts. Compliance with State and local regulations would be required of all developments in the City and within the District. Similarly, all development projects would also require site-specific geological and paleontological analysis that could lead to mitigation requiring monitoring and recovery, identification, and curation of any resources discovered. The proposed project has included a mitigation measure that would reduce the potential for project-related activities to contribute to cumulative impacts to paleontological resources.

Overall, the proposed project would not introduce new uses to the campus and would not substantially alter the campus beyond compared to existing conditions. Therefore, the proposed project would not have a cumulative effect related to geology and soils, and cumulative impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

3.6 GEOLOGY AND SOILS

3.6.6 References

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3.7 GREENHOUSE GAS EMISSIONS

This section of the Draft Environmental Impact Report (DEIR) describes the potential impacts related to greenhouse gas (GHG) emissions associated with the Paradise High School Expansion Project (proposed project). The evaluation in this section is based on the methodology recommended by the Butte County Air Quality Management District (BCAQMD) and guidance within the California Air Resources Board's (CARB) most recent Scoping Plan. The analysis is also based in part on the following technical report.

- *Air Quality and Greenhouse Gas Emissions Data*, PlaceWorks, March 2026

A complete copy of this technical report is provided in Appendix B of this DEIR.

During the Notice of Preparation (NOP) public review period, no comments were received regarding GHG impacts. The NOP is included as Appendix A of this DEIR.

Terminology

The following are definitions for terms used throughout this section.

- **Greenhouse gases (GHG).** Gases in the atmosphere that absorb infrared light, thereby retaining heat in the atmosphere and contributing to a greenhouse effect.
- **Global warming potential (GWP).** Metric used to describe how much heat a molecule of a GHG absorbs relative to a molecule of carbon dioxide (CO₂) over a given period of time (20, 100, and 500 years). CO₂ has a GWP of 1.
- **Carbon dioxide-equivalent (CO₂e).** The standard unit to measure the amount of GHGs in terms of the amount of CO₂ that would cause the same amount of warming. CO₂e is based on the GWP ratios between the various GHGs relative to CO₂.
- **MTCO₂e.** Metric ton of CO₂e.

3.7.1 Regulatory Framework

FEDERAL

The United States Environmental Protection Agency (EPA) announced on December 7, 2009, that GHG emissions threaten the public health and welfare of the American people and that GHG emissions from on-road vehicles contribute to that threat. The EPA's final findings respond to the 2007 United States Supreme Court decision that GHG emissions fit within the Clean Air Act definition of air pollutants. The findings do not impose any emission reduction requirements

3.7 GREENHOUSE GAS EMISSIONS

but allow the EPA to finalize the GHG standards proposed in 2009 for new light-duty vehicles as part of the joint rulemaking with the Department of Transportation (USEPA 2009a).

To regulate GHGs from passenger vehicles, the EPA was required to issue an endangerment finding (USEPA 2025a). The finding identified emissions of six key GHGs—carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆)—that have been the subject of scrutiny and intense analysis for decades by scientists in the United States and around the world. The first three are applicable to the project’s GHG emissions inventory because they constitute the majority of GHG emissions and, according to guidance by the Bay Area Air District (Air District), are the GHG emissions that should be evaluated as part of a project’s GHG emissions inventory. However, in response to President Trump’s “Unleashing American Energy” executive order (EO), published on January 20, 2025, the EPA announced on March 12, 2025, its intention to reconsider regulations and actions that rely on the endangerment finding (Holland & Knight 2025).

The March 12 announcement specifically targets the following, which impact GHG emissions:

- Advanced Clean Trucks (ACT) Plan
- Control of Air Pollution from New Motor Vehicles: Heavy-Duty Engine and Vehicle Standards
- Multi-Pollutant Emissions Standards for MY 2027 and Later Light- and Medium-Duty Vehicles
- Greenhouse Gas Emissions Standards for Heavy-Duty Vehicles, Phase 3
- Corporate Average Fuel Economy (CAFE) Standards

Mandatory Reporting Rule for GHGs (2009)

In response to the endangerment finding, the EPA issued the Mandatory Reporting of GHG Rule that requires substantial emitters of GHG emissions (e.g., large stationary sources) to report GHG emissions data. Facilities that emit 25,000 metric tons (MT) or more of carbon dioxide-equivalent (CO₂e) per year are required to submit an annual report. However, under its Proposed Reconsideration of the Greenhouse Gas Reporting Program, the EPA would rescind reporting requirements for a substantial portion of the Greenhouse Gas Reporting Program (covering most source categories) and would suspend reporting obligations for the remaining sectors (those under Subpart W of the Greenhouse Gas Reporting Program) until reporting year 2034 (Holland & Knight 2025).

Federal Fuel Economy and Fuel Standards

Update to Corporate Average Fuel Economy Standards

The federal government issued new CAFE standards in 2012 for vehicle model years 2017 to 2025, requiring a fleet average of 54.5 miles per gallon (mpg) in 2025. However, on March 30, 2020, the EPA finalized updated CAFE and GHG emissions standards for passenger cars and light trucks, covering model years 2021 through 2026, known as the Safer Affordable Fuel Efficient (SAFE) Vehicles Final Rule for Model Years 2021 to 2026. On June 7, 2024, the National Highway Traffic Safety Administration (NHTSA) announced final CAFE standards for passenger cars and light trucks built in model years 2027 to 2031 and final fuel efficiency standards for heavy-duty pickup trucks and vans built in model years 2030 to 2035. The final rules establish standards that would require an industry fleet-wide average of approximately 50.4 mpg for passenger cars and light trucks in model year 2031 by increasing fuel economy by 2 percent year over year for passenger cars (model years 2027 to 2031) and for light trucks (model years 2029 to 2031). For heavy-duty pickup trucks and vans, the final rule would increase fuel efficiency at a rate of 10 percent per year (model years 2030 to 2032) and 8 percent per year (model years 2033 to 2035) (NHTSA 2024).

Multi-pollutant Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles

In 2024, the EPA issued a final rule, “Multi-pollutant Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles,” that sets new, more protective standards to reduce harmful air pollutant emissions from light-duty and medium-duty vehicles, starting with model year 2027 (USEPA 2025b).

2025 Rollback of CAFE and Federal Fuel Standards

While both the new CAFE standards and fuel standard are currently in effect, the Trump Administration directed the Department of Transportation to rescind and replace all existing CAFE standards and emissions standards on January 29, 2025. This action targeted regulations covering model years 2024 through 2035 for both light-duty and heavy-duty vehicles.

On June 6, 2025, the NHTSA published an interpretive rule that establishes the NHTSA’s authority to revise the CAFE standards without consideration of electric vehicles (EV). California currently has no authority to implement these standards.

On June 11, 2025, the NHTSA published the final rule, “Resetting the Corporate Average Fuel Economy Program.” This rule does not immediately change current fuel economy standards; however, the rule clarifies the NHTSA’s interpretation of its obligations for CAFE standards stemming from the Energy Policy and Conservation Act of 1975 and the Energy Independence

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and Security Act of 2007. The rule asserts that some regulations, such as those established under previous presidential administrations, improperly considered EVs when identifying the “maximum feasibility” average fuel economy level upon which CAFE standards are developed, thereby establishing a legal foundation for future rollbacks of CAFE standards (NHTSA 2025).

STATE

Current State of California guidance and goals for reductions in GHG emissions are generally embodied in Executive Order (EO) S-03-05, Assembly Bill (AB) 32, AB 1279, Senate Bill (SB) 32, EO B-30-15, and SB 375.

Executive Order S-03-05

EO S-03-05, signed June 1, 2005, set the following GHG reduction targets for the state: 2000 levels by 2010, 1990 levels by 2020, and 80 percent below 1990 levels by 2050.

Assembly Bill 32, Global Warming Solutions Act (2006)

Commonly known by its legislative bill number (AB 32), this act was signed August 31, 2006, to reduce California’s contribution of GHG emissions. AB 32 follows the 2020 tier of emissions-reduction targets established in EO S-03-05. The California Air Resources Board (CARB) prepared the 2008 Scoping Plan to outline a plan to achieve the GHG emissions reduction targets of AB 32.

Executive Order B-30-15

EO B-30-15, signed April 29, 2015, set a goal of reducing GHG emissions in the state to 40 percent of 1990 levels by 2030. EO B-30-15 also directed CARB to update the Scoping Plan to quantify the 2030 GHG reduction goal for the state and requires State agencies to implement measures to meet the interim 2030 goal as well as the long-term goal for 2050 in EO S-03-05. It also requires the Natural Resources Agency to conduct triennial updates of the California adaptation strategy, “Safeguarding California,” to ensure climate change is accounted for in State planning and investment decisions.

Senate Bill 32 and Assembly Bill 197

In September 2016, SB 32 and AB 197 were signed, making the EO goal for year 2030 into a statewide mandated legislative target. AB 197 established a joint legislative committee on climate change policies and requires CARB to prioritize direct emissions reductions rather than the market-based cap-and-trade program for large stationary, mobile, and other sources.

Executive Order B-55-18

EO B-55-18, signed September 10, 2018, sets a goal “to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter.”

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EO B-55-18 directs CARB to work with relevant State agencies to ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal. The goal of carbon neutrality by 2045 is in addition to other statewide goals, meaning not only should emissions be reduced to 80 percent below 1990 levels by 2050, but that, by no later than 2045, the remaining emissions should be offset by equivalent net removals of CO₂e from the atmosphere, including through sequestration in forests, soils, and other natural landscapes.

Assembly Bill 1279

AB 1279, signed by Governor Newsom in September 2022, codifies the carbon neutrality targets of EO B-55-18 for year 2045 and sets a new legislative target for year 2045 of 85 percent below 1990 levels for anthropogenic GHG emissions. CARB was required to update the Scoping Plan to identify and recommend measures to achieve the net-zero and GHG emissions-reduction goals.

2022 Climate Change Scoping Plan Update

CARB adopted the 2022 Scoping Plan for Achieving Carbon Neutrality (Scoping Plan) on December 15, 2022, which lays out a path to achieve carbon neutrality by 2045 or earlier and to reduce the state's anthropogenic (human-caused) GHG emissions (CARB 2022). The Scoping Plan was updated to address the carbon neutrality goals of EO B-55-18 and the ambitious GHG reduction target as directed by AB 1279. Previous Scoping Plans focused on specific GHG reduction targets for our industrial, energy, and transportation sectors—to meet 1990 levels by 2020, and then the more aggressive 40 percent below that for the 2030 target. This Scoping Plan expands on earlier Scoping Plans with a target of reducing anthropogenic emissions to 85 percent below 1990 levels by 2045. Carbon neutrality takes it one step further by expanding actions to capture and store carbon, including through natural and working lands and mechanical technologies, while drastically reducing anthropogenic sources of carbon pollution at the same time.

The path forward was informed by the recent Sixth Assessment Report of the IPCC, and the measures would achieve 85 percent below 1990 levels by 2045 in accordance with AB 1279. CARB's 2022 Scoping Plan identifies strategies, as shown in Table 3.7-1, *Priority Strategies for Local Government Climate Action Plans*, that would be most impactful at the local level for ensuring substantial progress toward the State's carbon neutrality goals.

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Table 3.7-1 Priority Strategies for Local Government Climate Action Plans

Priority Area	Priority Strategies
Transportation Electrification	Convert local government fleets to zero-emission vehicles (ZEV) and provide electric vehicle (EV) charging at public sites.
	Create a jurisdiction-specific ZEV ecosystem to support deployment of ZEVs statewide (such as building standards that exceed State building codes, permit streamlining, infrastructure siting, consumer education, preferential parking policies, and ZEV readiness plans).
Vehicle-Miles Traveled (VMT) Reduction	Reduce or eliminate minimum parking standards.
	Implement complete streets policies and investments, consistent with general plan circulation element requirements.
	Increase access to public transit by increasing density of development near transit, improving transit service by increasing service frequency, creating bus priority lanes, reducing or eliminating fares, microtransit, and other approaches.
	Increase public access to clean mobility options by planning for and investing in electric shuttles, bike share, car share, and walking.
	Implement parking pricing or transportation demand management pricing strategies.
	Amend zoning or development codes to enable mixed-use, walkable, transit-oriented, and compact infill development (such as increasing allowable density of the neighborhood).
	Preserve natural and working lands by implementing land use policies that guide development toward infill areas and do not convert “greenfield” land to urban uses (e.g., green belts, strategic conservation easements).
Building Decarbonization	Adopt all-electric new construction reach codes for residential and commercial uses.
	Adopt policies and incentive programs to implement energy efficiency retrofits for existing buildings, such as weatherization, lighting upgrades, and replacing energy-intensive appliances and equipment with more efficient systems (such as Energy Star-rated equipment and equipment controllers).
	Adopt policies and incentive programs to electrify all appliances and equipment in existing buildings such as appliance rebates, existing building reach codes, or time of sale electrification ordinances.
	Facilitate deployment of renewable energy production and distribution and energy storage on privately owned land uses (e.g., permit streamlining, information sharing).
	Deploy renewable energy production and energy storage directly in new public projects and on existing public facilities (e.g., solar photovoltaic systems on rooftops of municipal buildings and on canopies in public parking lots, battery storage systems in municipal buildings).

Source: CARB 2022.

For residential and mixed-use development projects, CARB recommends this first approach to demonstrate that these land use development projects are aligned with state climate goals, based on the attributes of land use development that reduce operational GHG emissions while

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simultaneously advancing fair housing. As described in Section 3.5.4, *Standards for Analysis*, the same project attributes outlined in the Scoping Plan for consistency with state climate goals are used by the Bay Area Air District to assess GHG emissions impacts for residential and non-residential projects. Therefore, the Scoping Plan's project attributes for reducing GHG emissions for residential and mixed-use projects may also apply to other development types including school uses. These project attributes that reduce GHGs include the following:

- **Transportation Electrification.** Provide EV charging infrastructure that, at a minimum, meets the most ambitious voluntary standards in the California Green Building Standards Code (CALGreen) at the time of project approval.
- **Vehicle-Miles Traveled Reduction**
 - Is located on infill sites that are surrounded by existing urban uses and reuses or redevelops previously undeveloped or underutilized land that is presently served by existing utilities and essential public services (e.g., transit, streets, water, sewer).
 - Does not result in the loss or conversion of the State's natural and working lands.
 - Consists of transit-supportive densities (minimum of 20 residential dwelling units/acre) or is in proximity to existing transit stops (within a half mile) or satisfies more detailed and stringent criteria specified in the region's Sustainable Communities Strategy (SCS).
 - Reduces parking requirements by:
 - Eliminating parking requirements or including maximum allowable parking ratios (i.e., the ratio of parking spaces to residential units or square feet).
 - Providing residential parking supply at a ratio of <1 parking space per dwelling unit.
 - For multifamily residential development, requiring parking costs to be unbundled from costs to rent or own a residential unit.
 - At least 20 percent of the units are affordable to lower-income residents.
 - Result in no net loss of existing affordable units.
- **Building Decarbonization.** Uses all-electric appliances without any natural gas connections and does not use propane or other fossil fuels for space heating, water heating, or indoor cooking.

The second approach to demonstrating project-level alignment with State climate goals is net-zero GHG emissions. The third approach is to align with GHG thresholds of significance, which many local air quality management and air pollution control districts have developed or adopted (CARB 2022).

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Senate Bill 375

SB 375, the Sustainable Communities and Climate Protection Act, was adopted in 2008 to connect the GHG emissions reduction targets established in the 2008 Scoping Plan for the transportation sector to local land use decisions that affect travel behavior. Its intent is to reduce GHG emissions from light-duty trucks and automobiles (i.e., excluding emissions associated with goods movement) by aligning regional long-range transportation plans, investments, and housing allocations to local land use planning to reduce vehicle-miles traveled (VMT) and vehicle trips. Specifically, SB 375 required CARB to establish GHG emissions reduction targets for each of the 18 metropolitan planning organizations (MPO). The Butte County Association of Governments (BCAG) is the MPO for Butte County.

Pursuant to the recommendations of the Regional Transportation Advisory Committee, CARB adopted per-capita reduction targets for each of the MPOs rather than a total magnitude reduction target. CARB is required to update the targets for the MPOs every eight years. In June 2017, CARB released updated targets and technical methodology, and then released another update in February 2018, which became effective in October 2018. CARB staff began the target update process in 2024 with a public workshop and plans to conclude it in 2026 with Board approval of the new targets (CARB 2025).

The updated targets consider the need to further reduce VMT, as identified in the 2017 Scoping Plan Update, while balancing the need for additional and more flexible revenue sources to incentivize positive planning and action toward sustainable communities. The updated SB 375 targets are in units of percent per-capita reduction in GHG emissions from automobiles and light trucks compared to 2005. This excludes reductions anticipated from implementation of State technology and fuels strategies and any potential future State strategies such as statewide road user pricing. The updated targets call for greater per-capita GHG emission reductions from SB 375 than were currently in place, which for 2035 translates into updated targets that either match or exceed the emission reduction levels in the MPOs' currently adopted SCSs. CARB's updated targets result in an additional reduction of over 8 MMTCO₂e in 2035 compared to the prior targets (CARB 2018).

Transportation Sector Specific Regulations

Advanced Clean Fleets and Advanced Clean Trucks

CARB adopted the Advanced Clean Fleets (ACF) regulation in 2023 to accelerate the transition to zero-emission medium- and heavy-duty vehicles. In conjunction with the Advanced Clean Trucks (ACT) regulation, the ACF regulations help to ensure that medium- and heavy-duty ZEVs are brought to the market, by requiring certain fleets to purchase ZEVs. The ACF ZEV phase-in approach provides initial focus where the best fleet electrification opportunities exist, sets clear

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targets for regulated fleets to make a full conversion to ZEVs, and creates a catalyst to accelerate development of a heavy-duty public charging infrastructure network.

Assembly Bill 1493

California vehicle GHG emission standards were enacted under AB 1493 (Pavley I). Pavley I is a clean-car standard that reduces GHG emissions from new passenger vehicles (light-duty auto to medium-duty vehicles) from 2009 through 2016 and was anticipated to reduce GHG emissions from new passenger vehicles by 30 percent in 2016. California implements the Pavley I standards through a waiver granted to California by the EPA. In 2012, the EPA issued a Final Rulemaking that set even more stringent fuel economy and GHG emissions standards for model years 2017 through 2025 light-duty vehicles. (See also the discussion in federal regulations under “*Update to Corporate Average Fuel Economy Standards (2017 to 2026)*.”)

In January 2012, CARB approved the Advanced Clean Cars program (formerly known as Pavley II) for model years 2017 through 2025. The program combines the control of smog, soot, and GHGs with requirements for greater numbers of ZEVs into a single package of standards. California’s Advanced Clean Car II regulations will rapidly scale down light-duty passenger car, pickup truck, and SUV emissions starting with 2026 model year through 2035 (CARB 2023).

Executive Order S-01-07

On January 18, 2007, the State set a new low carbon fuel standard (LCFS) for transportation fuels sold in the state. EO S-01-07 set a declining standard for GHG emissions measured in CO₂e gram per unit of fuel energy sold in California. The LCFS required a reduction of 2.5 percent in the carbon intensity of California’s transportation fuels by 2015 and a reduction of at least 10 percent by 2020. The standard applied to refiners, blenders, producers, and importers of transportation fuels, and used market-based mechanisms to allow these providers to choose the most economically feasible methods for reducing emissions during the “fuel cycle.”

Executive Order B-16-2012

On March 23, 2012, the State directed CARB, the California Energy Commission (CEC), the Public Utilities Commission, and other relevant agencies to work with the Plug-in Electric Vehicle Collaborative and the California Fuel Cell Partnership to establish benchmarks to accommodate ZEVs in major metropolitan areas, including infrastructure to support them (e.g., EV charging stations). EO B-16-2012 also directed the number of ZEVs in California’s State vehicle fleet to increase through the normal course of fleet replacement so that at least 10 percent of fleet purchases of light-duty vehicles are ZE by 2015 and at least 25 percent by 2020. The EO also established a target for the transportation sector of reducing GHG emissions to 80 percent below 1990 levels.

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Executive Order N-79-20

On September 23, 2020, Governor Newsom signed EO N-79-20, establishing a goal that 100 percent of in-state sales of new passenger cars and trucks will be ZE by 2035. Additionally, the fleet goals for trucks are that 100 percent of drayage trucks are ZE by 2035, and 100 percent of medium- and heavy-duty vehicles in the state are ZE by 2045, where feasible. The EO's goal for the State is to transition to 100 percent ZE off-road vehicles and equipment by 2035, where feasible.

Renewables Portfolio: Carbon Neutrality Regulations

Senate Bills 1078, 107, and X1-2 and Executive Order S-14-08

A major component of California's Renewable Energy Program is the renewables portfolio standard established under SB 1078 (Sher) and SB 107 (Simitian). Under the RPS, certain retail sellers of electricity were required to increase the amount of renewable energy each year by at least 1 percent to reach at least 20 percent by December 30, 2010. EO S-14-08, signed in November 2008, expanded the State's renewable energy standard to 33 percent renewable power by 2020. This standard was adopted by the legislature in 2011 (SB X1-2). Eligible renewable sources of electricity include wind, small hydropower, solar, geothermal, biomass, and biogas. The increase in renewable sources for electricity production decreases indirect GHG emissions from development projects because electricity production from renewable sources is generally considered carbon neutral.

Senate Bill 350

SB 350 (de Leon) was signed into law in September 2015 and establishes tiered increases to the RPS—40 percent by 2024, 45 percent by 2027, and 50 percent by 2030. SB 350 also set a new goal to double the energy-efficiency savings in electricity and natural gas through energy efficiency and conservation measures.

Senate Bill 100

On September 10, 2018, Governor Brown signed SB 100. Under SB 100, the RPS for public-owned facilities and retail sellers consists of 44 percent renewable energy by 2024, 52 percent by 2027, and 60 percent by 2030. SB 100 also established a new RPS requirement of 50 percent by 2026. Furthermore, the bill establishes an overall State policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all State agencies by December 31, 2045. Under the bill, the State cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

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Senate Bill 1020

SB 1020 was signed into law on September 16, 2022. SB 1020 provides interim RPS targets (90 percent renewable energy by 2035 and 95 percent renewable energy by 2040) and requires renewable energy and zero-carbon resources to reach 100 percent clean electricity by 2045.

Energy-Efficiency Regulations

California Energy-Efficiency Standards

Energy conservation standards for new residential and nonresidential buildings were adopted by the California Energy Resources Conservation and Development Commission (now the CEC) in June 1977 (Title 24, Part 6, of the California Code of Regulations [CCR]). The Energy Code requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for the consideration and possible incorporation of new energy efficiency technologies and methods.

In 2024, the CEC adopted the 2025 Building Energy Efficiency Standards, which were subsequently approved by the California Building Standards Commission. The 2025 standards become effective and replace the existing 2022 standards on January 1, 2026. The 2025 standards would include prescriptive photovoltaic system and battery requirements for high-rise multifamily buildings (i.e., more than three stories) and nonresidential buildings such as hotels, offices, medical offices, restaurants, retail stores, schools, warehouses, theaters, and convention centers. The California Building Standards Code (all parts of 24 CCR) undergoes a triennial update with a goal to achieve zero net energy for new nonresidential buildings by 2030.

California Building Code: Title 24, Part 11, Green Building Standards

On July 17, 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (24 CCR, Part 11, known as CALGreen) was adopted as part of the California Building Standards Code. CALGreen established planning and design standards for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants. The mandatory provisions of CALGreen became effective January 1, 2011, and were most recently updated in 2024 (2025 CALGreen update). The 2025 CALGreen update becomes effective on January 1, 2026, and provides updates to the residential and nonresidential voluntary measures.

2006 Appliance Efficiency Regulations

The 2006 Appliance Efficiency Regulations (20 CCR Sections 1601–1608) were adopted by the CEC on October 11, 2006, and approved by the California Office of Administrative Law on

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December 14, 2006. The regulations include standards for both federally regulated appliances and non-federally regulated appliances. Though these regulations are now often viewed as “business as usual,” they exceed the standards imposed by all other states, and they reduce GHG emissions by reducing energy demand.

Solid Waste Diversion Regulations

Assembly Bill 939: Integrated Waste Management Act of 1989

California’s Integrated Waste Management Act of 1989 (AB 939, Public Resources Code Section 40050 et seq.) set a requirement for cities and counties throughout the state to divert 50 percent of all solid waste from landfills by January 1, 2000, through source reduction, recycling, and composting. In 2008, the requirements were modified to reflect a per capita requirement rather than tonnage. To help achieve this, the Act requires that each city and county prepare and submit a source reduction and recycling element. AB 939 also established the goal for all California counties to provide at least 15 years of ongoing landfill capacity.

Assembly Bill 341

AB 341 (Chapter 476, Statutes of 2011) increased the statewide goal for waste diversion to 75 percent by 2020 and requires recycling of waste from commercial and multi-family residential land uses. Section 5.408 of CALGreen also requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse.

Assembly Bill 1327

The California Solid Waste Reuse and Recycling Access Act (AB 1327, Public Resources Code Section 42900 et seq.) requires areas to be set aside for collecting and loading recyclable materials in development projects. The Act required the California Integrated Waste Management Board to develop a model ordinance for adoption by any local agency requiring adequate areas for collection and loading of recyclable materials as part of development projects. Local agencies are required to adopt the model or an ordinance of their own.

Assembly Bill 1826

In October 2014, Governor Brown signed AB 1826, requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste they generate per week. This law also requires that on and after January 1, 2016, local jurisdictions across the state implement an organic waste recycling program to divert organic waste generated by businesses and multifamily residential dwellings with five or more units. Organic waste means food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed with food waste.

Water-Efficiency Regulations

Senate Bill X7-7

The 20x2020 Water Conservation Plan was issued by the California Department of Water Resources (DWR) in 2010 pursuant to SB 7, which was adopted during the 7th Extraordinary Session of 2009–2010 and therefore dubbed “SBX7-7.” SBX7-7 mandated urban water conservation and authorized DWR to prepare a plan implementing urban water conservation requirements, which DWR did through the 20x2020 Water Conservation Plan. In addition, it required agricultural water providers to prepare agricultural water management plans, measure water deliveries to customers, and implement other efficiency measures. SBX7-7 required urban water providers to adopt a water conservation target of a 20 percent reduction in urban per-capita water use by 2020 compared to 2005 baseline use.

Assembly Bill 1881: Water Conservation in Landscaping Act

The Water Conservation in Landscaping Act of 2006 (AB 1881) requires local agencies to adopt the updated DWR model ordinance or an equivalent. AB 1881 also requires CEC to consult with DWR to adopt, by regulation, performance standards and labeling requirements for landscape irrigation equipment, including irrigation controllers, moisture sensors, emission devices, and valves, to reduce the wasteful, uneconomic, inefficient, or unnecessary consumption of energy or water.

Short-Lived Climate Pollutant Reduction Strategy

On September 19, 2016, the governor signed SB 1383 to supplement the GHG reduction strategies in the Scoping Plan to consider short-lived climate pollutants, including black carbon and methane. Black carbon is the light-absorbing component of fine particulate matter produced during the incomplete combustion of fuels. SB 1383 required CARB, no later than January 1, 2018, to approve and begin implementing a comprehensive strategy to reduce emissions of short-lived climate pollutants to achieve a reduction in methane by 40 percent, hydrofluorocarbon gases by 40 percent, and anthropogenic black carbon by 50 percent below 2013 levels by 2030. The bill also established targets for reducing organic waste in landfills. On March 14, 2017, CARB adopted the Short-Lived Climate Pollutant Reduction Strategy, which identifies the State’s approach to reducing anthropogenic and biogenic sources of short-lived climate pollutants. Anthropogenic sources of black carbon include on- and off-road transportation, residential wood burning, fuel combustion (charbroiling), and industrial processes. According to CARB, ambient levels of black carbon in California are 90 percent lower than in the early 1960s despite the tripling of diesel fuel use (CARB 2017). In-use on-road rules were expected to reduce black carbon emissions from on-road sources by 80 percent between 2000 and 2020.

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REGIONAL

Butte County Association of Governments Regional Transportation Plan/Sustainable Communities Strategy

SB 375 requires each MPO to prepare an SCS in its regional transportation plan (RTP). For the BCAG region, the 2024 RTP/SCS was adopted on December 12, 2024. In general, the SCS outlines a development pattern for the region that, when integrated with the transportation network and other transportation measures and policies, would reduce VMT from automobiles and light-duty trucks and thereby reduce GHG emissions from these sources.

The 2024 RTP/SCS focuses on the continued efforts of the previous RTP/SCSs to integrate transportation and land-use strategies in the development of the BCAG region through the horizon year 2040 (BCAG 2024). It forecasts that the BCAG region will meet its GHG per-capita reduction targets of 7 percent by 2035 (BCAG 2024).

3.7.2 Existing Conditions

GREENHOUSE GASES AND CLIMATE CHANGE

Human activities contribute to global climate change by adding large amounts of heat-trapping gases, known as GHG, to the atmosphere. The primary source of GHGs is fossil fuel use. The Intergovernmental Panel on Climate Change (IPCC) has identified four major GHGs—water vapor, carbon dioxide (CO₂), methane (CH₄), and ozone (O₃)—that may cause an increase in global average temperatures observed in the 20th and 21st centuries. Other GHGs identified by the IPCC that contribute to global warming to a lesser extent include nitrous oxide (N₂O), sulfur hexafluoride (SF₆), hydrofluorocarbons, perfluorocarbons, and chlorofluorocarbons (IPCC 2001).^{1,2}

The major GHGs are briefly described as follows:

¹ Water vapor (H₂O) is the strongest GHG and the most variable in its phases (vapor, cloud droplets, ice crystals). However, water vapor is not considered a pollutant because it is considered part of the feedback loop of changing radiative forcing rather than a primary cause of change.

² Black carbon contributes to climate change both directly, by absorbing sunlight, and indirectly, by depositing on snow (making it melt faster) and by interacting with clouds and affecting cloud formation. Black carbon is the most strongly light-absorbing component of particulate matter (PM) emitted from burning fuels such as coal, diesel, and biomass. Reducing black carbon emissions globally can have immediate economic, climate, and public health benefits. California has been an international leader in reducing emissions of black carbon, with close to 95 percent control expected by 2020 due to existing programs that target reducing PM from diesel engines and burning activities (CARB 2017). However, State and national GHG inventories do not include black carbon due to ongoing work resolving the precise global warming potential of black carbon. Guidance for CEQA documents does not yet include black carbon.

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- **Carbon dioxide (CO₂)** enters the atmosphere through the burning of fossil fuels (oil, natural gas, and coal), solid waste, trees and wood products, and respiration, and as a result of other chemical reactions (e.g., manufacture of cement). Carbon dioxide is removed from the atmosphere (sequestered) when it is absorbed by plants as part of the biological carbon cycle.
- **Methane (CH₄)** is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from livestock and other agricultural practices and from the decay of organic waste in municipal landfills and water treatment facilities.
- **Nitrous oxide (N₂O)** is emitted during agricultural and industrial activities as well as during combustion of fossil fuels and solid waste.

GHGs are dependent on the lifetime, or persistence, of the gas molecule in the atmosphere. Some GHGs have a stronger greenhouse effect than others. These are referred to as high global warming potential (GWP) gases. The GWP of applicable GHG emissions are shown in Table 3.7-2, *GHG Emissions and Their Relative Global Warming Potential Compared to CO₂*. The GWP is used to convert GHGs to CO₂-equivalence (CO₂e) to show the relative potential that different GHGs have to contribute to the greenhouse effect. For example, under IPCC's Fourth Assessment Report (AR4) GWP values for methane (CH₄), a project that generates 10 metric tons (MT) of CH₄ would be equivalent to 250 MT of CO₂.³

Table 3.7-2 GHG Emissions and Their Relative Global Warming Potential Compared to CO₂

GHGs	Fourth Assessment Report Global Warming Potential Relative to CO ₂ ¹	Fifth Assessment Report Global Warming Potential Relative to CO ₂ ¹	Sixth Assessment Report Global Warming Potential Relative to CO ₂ ¹
Carbon Dioxide (CO ₂)	1	1	1
Methane (CH ₄) ²	25	28	30
Nitrous Oxide (N ₂ O)	298	265	273

Sources: IPCC 2007, 2014, 2023.

Note: The IPCC published updated GWP values in its Sixth Assessment Report (AR6) that reflect new information on atmospheric lifetimes of GHGs and an improved calculation of the radiative forcing of CO₂. However, GWP values identified in AR4 are used by CalEEMod for emissions calculations. Therefore, this analysis utilizes AR4 GWP values consistent with the latest version of CalEEMod.

1. Based on 100-year horizon of the GWP of the air pollutant compared to CO₂.

³ CO₂-equivalence is used to show the relative potential that different GHGs have to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. The global warming potential of a GHG is also dependent on the lifetime, or persistence, of the gas molecule in the atmosphere.

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2. The methane GWP includes direct effects and indirect effects due to the production of tropospheric ozone and stratospheric water vapor. The indirect effect due to the production of CO₂ is not included.

Human Influence on Climate Change

For approximately 1,000 years before the Industrial Revolution, the number of GHGs in the atmosphere remained fairly constant. However, during the twentieth century, scientists observed a rapid change in the climate and the quantity of climate change pollutants in the Earth's atmosphere that is attributable to human activities.

The recent IPCC Sixth Assessment Report (AR6) summarizes the latest scientific consensus on climate change. It finds that atmospheric concentrations of CO₂ have increased by 50 percent since the Industrial Revolution and continue to increase at a rate of two parts per million each year. By the 2030s, and no later than 2040, the world will exceed 1.5 degrees Celsius (°C) warming (CARB 2022). These recent changes in the quantity and concentration of climate change pollutants far exceed the extremes of the ice ages, and the global mean temperature is warming at a rate that cannot be explained by natural causes alone. Human activities are directly altering the chemical composition of the atmosphere through the buildup of climate change pollutants (CAT 2006). In the past, gradual changes in the Earth's temperature changed the distribution of species, availability of water, and other conditions. Human activities are accelerating this process so that environmental impacts associated with climate change no longer occur in a geologic time frame but within a human lifetime (IPCC 2001).

Like the variability in the projections of the expected increase in global surface temperatures, the environmental consequences of gradual changes in the Earth's temperature are hard to predict. Projections of climate change depend heavily on future human activity. Therefore, climate models are based on different emission scenarios that account for historical trends in emissions and on observations of the climate record that assess the human influence of the trend and projections for extreme weather events. Climate-change scenarios are affected by varying degrees of uncertainty. For example, there are varying degrees of certainty on the magnitude of the trends for:

- Warmer and fewer cold days and nights over most land areas.
- Warmer and more frequent hot days and nights over most land areas.
- An increase in frequency of warm spells/heat waves over most land areas.
- An increase in frequency of heavy precipitation events (or proportion of total rainfall from heavy rainfalls) over most areas.
- Larger areas affected by drought.
- Intense tropical cyclone activity increases.
- Increased incidence of extreme high sea levels (excluding tsunamis).

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Potential Climate Change Impacts for California

There is at least a greater than 50 percent likelihood that global warming will reach or exceed 1.5°C in the near term, even for the very low GHG emissions scenario (IPCC 2023). Climate change is already impacting California and will continue to affect it for the foreseeable future. For example, the average temperature in most areas of California is already 1 degree Fahrenheit (°F) higher than historical levels, and some areas have seen average increases in excess of 2°F (Cal OES 2020). The California Fourth Climate Change Assessment identifies the following climate change impacts under a business-as-usual scenario, in which no new actions are taken to curb GHG emissions:

- Annual average daily high temperatures in California are expected to rise by 2.7°F by 2040, 5.8°F by 2070, and 8.8°F by 2100 compared to observed and modeled historical conditions. These changes are statewide averages. Heat waves are projected to become longer, more intense, and more frequent.
- Warming temperatures are expected to increase soil moisture loss and lead to drier seasonal conditions. Summer dryness may become prolonged, with soil drying beginning earlier in the spring and lasting longer into the fall and winter rainy season.
- High heat increases the risk of death from cardiovascular, respiratory, cerebrovascular, and other diseases.
- Droughts are likely to become more frequent and persistent through 2100.⁴
- Climate change is projected to increase the strength of the most intense precipitation and storm events affecting California.
- Mountain ranges in California are already seeing a reduction in the percentage of precipitation falling as snow. Snowpack levels are projected to decline significantly by 2100 due to reduced snowfall and faster snowmelt. California's water storage system is designed with the expectation that snow will stay frozen for many months, and that as it melts, it will be stored in a series of reservoirs and dams, many of which are used to generate electricity. Changing waterfall patterns therefore impact both water supply and electricity supply.
- Marine layer clouds are projected to decrease, though more research is needed to better understand their sensitivity to climate change.
- Extreme wildfires (i.e., fires larger than 10,000 hectares or 24,710 acres) are expected to occur 50 percent more frequently. The maximum area burned statewide may increase 178

⁴ Overall, California has become drier over time, with five of the eight years of severe to extreme drought occurring between 2007 and 2016, and with unprecedented dry years in 2014 and 2015. Statewide precipitation has become increasingly variable from year to year, with the driest consecutive four years occurring from 2012 to 2015.

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percent by the end of the century. Drought and reduced water supplies can increase wildfire risk.

- Exposure to wildfire smoke is linked to increased incidence of respiratory illness.
- Sea-level rise is expected to continue to increase erosion of beaches, cliffs, and bluffs (Cal OES 2020).

Global climate change risks to California are shown in Table 3.7-3, *Summary of GHG Emissions Risks to California*, and include impacts to public health, water resources, agriculture, coastal sea level, forest and biological resources, and energy.

Table 3.7-3 Summary of GHG Emissions Risks to California

Impact Category	Potential Risk
Public Health Impacts	Heat waves will be more frequent, hotter, and longer Fewer extremely cold nights Poor air quality made worse Higher temperatures increase ground-level ozone levels Deaths due to extreme heat
Water Resources Impacts	Decreasing Sierra Nevada snowpack Challenges in securing adequate water supply Potential reduction in hydropower Loss of winter recreation
Agricultural Impacts	Increasing temperature Increasing threats from pests and pathogens Expanded ranges of agricultural weeds Declining productivity Irregular blooms and harvests
Coastal Sea Level Impacts	Accelerated sea-level rise Increasing coastal floods Shrinking beaches Worsened impacts on infrastructure
Forest and Biological Resource Impacts	Increased risk and severity of wildfires Lengthening of the wildfire season Movement of forest areas Conversion of forest to grassland Declining forest productivity Increasing threats from pests and pathogens Shifting vegetation and species distribution Altered timing of migration and mating habits Loss of sensitive or slow-moving species
Energy Demand Impacts	Potential reduction in hydropower Increased energy demand

Sources: CEC 2006, 2009; CCC 2018; CNRA 2014; Cal OES 2020.

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CALIFORNIA'S GHG SOURCES AND RELATIVE CONTRIBUTION

In 2024, the statewide GHG emissions inventory was updated for 2000 to 2022 emissions using the GWPs in IPCC's AR4 and reported that California produced 371.1 MMTCO₂e GHG emissions in 2022 (2.4 percent lower than 2021 levels). The 2022 emissions data shows that California is continuing its established long-term trend of GHG emissions declines, despite the anomalous emissions trends from 2019 through 2021, due in large part to the impacts of the COVID-19 pandemic. In 2014, statewide GHG emissions dropped below the 2020 GHG Limit (AB 32 target for year 2020) and have remained below the limit since that time. Additionally, the carbon intensity of California's economy (the amount of carbon pollution per million dollars of gross state product [GSP]) is declining (CARB 2024).

California's transportation sector was the single-largest generator of GHG emissions, producing 37.7 percent of the state's total emissions. Industrial sector emissions made up 19.6 percent, and electric power generation made up 16.1 percent of the state's emissions inventory. Other major sectors of GHG emissions include residential and commercial (10.6 percent), agriculture and forestry (8.0 percent), high GWP (5.7 percent), and recycling and waste (2.2 percent).

Emissions from the transportation sector decreased compared to 2021, primarily due to a greater share of fuels used for on-road transportation being produced from non-fossil resources. Industrial sector decreases from 2021 to 2022, most notably in the oil and gas production sector. Electricity emissions also decreased compared to 2021 from the continued growth of in-state solar generation and increases to in-state hydropower and imported wind power. High-GWP gases continue to replace ozone-depleting substances being phased out under the 1987 Montreal Protocol and emissions from this sector have been stable from 2020 to 2022 (CARB 2024).

PROJECT SITE

The project site is vacant and does not generate GHG emissions under existing conditions.

3.7.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact related to greenhouse gas emissions if it would:

- a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

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- b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

THRESHOLD GUIDANCE

BCAQMD has not adopted a threshold of significance for GHG emissions. In determining the significance of impacts from GHG emissions, the CEQA Guidelines Section 15064.4(a) directs that GHG emissions be either (1) quantified or (2) described using a qualitative analysis or performance-based standards. Additionally, as stated in BCAQMD's CEQA Air Quality Handbook (Handbook), projects that are consistent with an approved GHG Emissions Reduction Plan would have a less than significant impact upon global climate change and would not require further analysis. The Handbook also allows lead agencies to reference greenhouse gas reduction strategies, targets, and thresholds established by other jurisdictions, such as the most current State Scoping Plan.

Because the Town of Paradise does not have an adopted GHG Emissions Reduction Plan, the following analysis utilizes a consistency approach with the applicable strategies from Appendix D, Local Actions, of the 2022 Scoping Plan. According to the 2022 Scoping Plan, projects would have less than significant impacts if they are 1) determined consistent with a local qualified GHG reduction strategy (i.e., Climate Action Plan) via CEQA Guidelines Section 15183.5, or 2) designed to be consistent with three primary best management practices (BMP) objectives of the 2022 Scoping Plan: transportation electrification, VMT reduction, and building decarbonization. The BMP approach recommends that a project be designed 100 percent electric (no natural gas), provide electric vehicle charging spaces in conformance with the voluntary Tier 2 standards of the CALGreen code, and be consistent with locally adopted VMT thresholds.

Mass Emissions and Health Effects

On December 24, 2018, in *Sierra Club et al. v. County of Fresno et al. (Friant Ranch)*, the California Supreme Court affirmed the holding of the Court of Appeal that EIRs for projects must not only identify impacts to human health, but also provide an "analysis of the correlation between the project's emissions and human health impacts" related to each criteria air pollutant that exceeds the regional significance thresholds or explain why it could not make such a connection. In general, the ruling focuses on the correlation of emissions of toxic air contaminants and criteria air pollutants and their impact to human health. While the case focused on toxic air contaminants and criteria air pollutants, the principles also apply to evaluating a project's GHG emissions and their significance in the context of climate change.

In 2009, the EPA issued an endangerment finding for six GHGs (CO₂, CH₄, N₂O, HFCs, PFCs, and SF₆) to regulate GHG emissions from passenger vehicles. The endangerment finding is based on evidence that shows an increase in mortality and morbidity associated with increases in average temperatures, which increase the likelihood of heat waves and ozone levels. While these

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identified effects, such as sea level rise and increase in extreme weather, can indirectly impact human health, neither the EPA nor CARB has established ambient air quality standards for GHG emissions. The State's GHG reduction strategy outlines a path to avoid the most catastrophic effects of climate change. Yet the State's GHG reduction goals and strategies are based on the State's path toward reducing statewide cumulative GHGs, as outlined in AB 32, SB 32, AB 1279, and EO B-55-18.

As described, the significance thresholds that BCAQMD recommends for use in analyzing GHG impacts are based on achieving the statewide GHG reduction goals (Impact Discussion [a]) and relying on consistency with policies or plans adopted to reduce GHG emissions (Impact Discussion [b]). Further, because no single project is large enough to result in a measurable increase in global concentration of GHG emissions, climate change impacts of a project are considered on a cumulative basis. Without federal ambient air quality standards for GHG emissions and given the cumulative nature of GHG emissions that are tied to reducing the state's cumulative GHG emissions, it is not feasible at this time to connect the project's specific GHG emissions to the potential health impacts of climate change.

METHODOLOGY

This GHG emissions evaluation was prepared in accordance with the requirements of CEQA to determine if significant GHG impacts are likely to occur as a result of the proposed project. In accordance with BCAQMD guidelines, all direct and indirect GHG emissions from the proposed project's construction and operation are identified and estimated in this analysis using the California Emissions Estimator Model (CalEEMod) Version 2022.1 and are provided for informational purposes. GHG emissions modeling is included in Appendix B of this DEIR. Typical sources of GHG emissions quantified in CalEEMod include emissions from off-road construction equipment, on-road vehicles, area sources (e.g., consumer products, cleaning supplies, and landscaping equipment), energy (e.g., electricity transmission and natural gas combustion), wastewater and water treatment and conveyance, and solid waste decomposition.

The proposed project would not result in an increase in student enrollment at Paradise HS, nor would it result in new events or an increase in attendees at the campus, as existing events currently hosted at other facilities on the campus would move the proposed practice field/stadium. As such, the proposed project would not result in new sources of mobile emissions since it would not result in new trips to the project site. Additionally, the proposed facilities, the agricultural building and practice field/stadium, would result in a negligible increase in water use and solid waste generation, and therefore minimal emissions from these sources. Furthermore, no proposed facilities would be connected to natural gas infrastructure and energy use from the proposed project would be limited to security and parking lot lighting. Therefore, the primary sources of GHG emissions under the proposed project would consist of temporary emissions from construction activities in addition to area source and energy source emissions during operation of the proposed project.

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The project-related construction emissions are based on information provided by the District and CalEEMod defaults. Construction was modeled across two phases, with Phase 1 from winter 2026 through summer 2027, encompassing construction of the agricultural building, and Phase 2 from 2030 to 2031, encompassing construction of the practice field/stadium and parking lot. Construction activities are assumed to take place five days per week. The construction equipment mix and worker/vendor trips were based on CalEEMod default assumptions. Hauling trips were calculated based on an estimated maximum volume of soil export.

Life-cycle emissions are not included in this analysis because not enough information is available for the proposed project, and life-cycle GHG emissions would be speculative (LCI 2008).⁵ Also, black carbon emissions are not included in the GHG analysis because CARB does not include this short-lived climate pollutant in the State's AB 32/SB 32 inventory but treats it separately (CARB 2017).

3.7.4 Project Impact Analysis

a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Global climate change is not confined to a particular project area and is generally accepted as the consequence of global industrialization over the last 200 years. A project does not generate enough GHG emissions on its own to influence global climate change; therefore, this section measures the proposed project's contribution to the cumulative environmental impact associated with GHG emissions.

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Development of the proposed project would contribute to climate change through direct and indirect emissions of GHG from the construction activities, which would generate a short-term increase in GHG emissions. Long-term emissions sources from the proposed project include energy use associated with electricity consumption and area sources, including consumer products, cleaning supplies, and landscaping equipment. The proposed project's construction

⁵ Life-cycle emissions include indirect emissions associated with materials manufacture. However, these indirect emissions involve numerous parties, each of which is responsible for GHG emissions of their particular activity. The California Resources Agency, in adopting the CEQA Guidelines Amendments on GHG emissions found that lifecycle analyses were not warranted for project-specific CEQA analysis in most situations, for a variety of reasons, including lack of control over some sources, and the possibility of double-counting emissions (CNRA 2009). Because the amount of materials consumed during the operation or construction phases of individual development projects is not known, the origin of the raw materials purchased is not known, and manufacturing information for those raw materials are also not known, calculation of life cycle emissions would be speculative. A life-cycle analysis is not warranted.

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and operational emissions are shown in Table 3.7-4, *Project-Related GHG Emissions*, for informational purposes.

Table 3.7-4 Project-Related GHG Emissions

Source	GHG Emissions MTCO ₂ e/Year
Construction	
Year 2026	13
Year 2027	202
Year 2030	332
Year 2031	<1
Total	547
Operation	
Area	<1
Energy	7
Total Annual Operational Emissions	7

Source: CalEEMod, Version 2022.1., Appendix B.

Note: MTons = metric tons; MTCO₂e = metric ton of carbon dioxide equivalent

GHG Emissions Reductions Plan

In lieu of an adopted quantitative threshold from BCAQMD, the proposed project is evaluated for consistency with an applicable GHG emissions reductions plan, CARB's 2022 Scoping Plan. As shown in Table 3.7-5, *Project Consistency with Scoping Plan Priority Areas*, the proposed project would be consistent with the building carbonization and VMT reduction priority areas. However, existing project plans do not show consistency with the transportation electrification priority area, resulting in **potentially significant impacts**.

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Table 3.7-5 Project Consistency with Scoping Plan Priority Areas

Priority Area	Priority Area Attributes	Project Consistency
Transportation Electrification	Provide electric vehicle (EV) charging infrastructure that, at a minimum, meets the most ambitious voluntary standards in the California Green Building Standards Code at the time of project approval.	Inconsistent: Current project plans do not identify consistency with the CALGreen Tier 2 non-residential EV charging requirements. Therefore, the proposed project would be inconsistent with this priority area.
Vehicle Miles Traveled (VMT) Reduction	Meets local jurisdiction adopted SB 743 threshold for VMT.	Consistent: The proposed project would not result in a net increase in trips to the project site. Therefore, it would have a less than significant VMT impact, as discussed in Section 3.12, <i>Transportation</i> , and the proposed project would be consistent with this priority area.
Building Decarbonization	Use all electric appliances without any natural gas connections and does not use propane or other fossil fuels for space heating, water heating, or indoor cooking.	Consistent. The proposed project would not require natural gas connections and would comply with the California Building Energy Efficiency Standards and CALGreen. Therefore, the proposed project would be consistent with this priority area.

Source: CARB 2022.

Significance without Mitigation: Potentially significant.

Impact GHG-1: The proposed project does not show consistency with the transportation electrification priority area of the 2022 CARB Scoping Plan. As a result, GHG emissions may result in a significant GHG emissions impact.

Mitigation Measure GHG-1: The proposed project shall comply with the applicable 2025 California Green Building Standards Code (CALGreen) Tier 2 standards. Plans shall identify the number of electric vehicle (EV) parking spaces with chargers that meet the 2025 CALGreen Tier 2 standards.

If the 2025 CALGreen Tier 2 standards cannot be fully implemented at the project site, the applicant shall calculate the reduction in GHG emissions resulting from the vehicle fuel switching opportunity of hybrid-electric vehicles that could charge on-site with a charging supply meeting the applicable CALGreen Tier 2 standards and identify alternative measures to implement on-site to achieve the same GHG emission reduction performance. Quantification of the reduction in GHG emissions resulting from the vehicle fuel switching opportunity of hybrid-electric vehicles that could charge on-site

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with a charging supply meeting the applicable CALGreen Tier 2 standards shall be in accordance with the California Air Pollution Control Officers Association's *Handbook for Analyzing Greenhouse Gas Emissions Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity*, Chapter 3, Measures to Reduce GHG Emissions: Transportation, Section T-14, Provide Electric Vehicle Charging Infrastructure. Alternative measures implemented by the District shall be quantified for GHG emission reductions for comparison against those identified for installing electric vehicle charging compliance with the applicable Tier 2 CALGreen standards to ensure that any combination of alternative measures implemented would reduce annual GHG emissions no less than those achieved by meeting Tier 2 CALGreen standards. Alternative measures implemented may include any combination of the following:

- **Installation of Renewable Generation Technology.** Prior to the issuance of occupancy, the project developer shall install renewable energy systems, such as solar or wind generation technologies. The project developer shall provide documentation to the District detailing the annual generation output of new on-site photovoltaic (e.g., solar) or other renewable generation technology (e.g., wind) beyond what would be required for project compliance with Title 24, Part 6. Quantification of the annual generation output of renewable generation technologies implemented as part of the proposed project shall utilize California Energy Commission (CEC)-approved energy modeling software or CEC-approved calculation methodology.
- **Building Energy Efficiency and Performance Improvements.** Prior to the issuance of building permits, the project developer shall provide documentation to the District detailing the building's energy efficiency performance beyond what would be required for project compliance with Title 24, Part 6. Documentation provided to the District to support implementation of this measure shall include at a minimum a completed Nonresidential Certificate of Compliance (NRCC) form and documented quantification of energy consumption reduction. Quantification of the reduced annual natural gas and electricity consumption resulting from building design improvements beyond that required for compliance with Title 24, Part 6 shall utilize CEC-approved energy modeling software. Annual energy consumption reduction resulting from building design improvements beyond that required under Title 24 shall be converted to MTCO₂e per year using the latest EPA-recommended conversion factors for natural gas and the latest carbon intensity factor for Pacific Gas & Electric (PG&E).
- **Low or Zero Global Warming Potential Refrigerants.** Prior to the issuance of occupancy, the District shall utilize low or zero global warming potential (GWP) refrigerant products in place of traditional refrigerant products used on the campus. Annual GHG emission reductions from using low or zero GWP refrigerant products

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shall be quantified using the latest California Air Resources Board- (CARB) approved methodology.

- **Carbon-Free Electricity.** Prior to the issuance of the certificate of occupancy, the District shall enroll in an available electricity service for carbon-free electricity. The District may enroll in Pacific Gas & Electric's (PG&E) "100% Solar Choice" or "Regional Renewable Choice" programs, or another equivalent electricity service which delivers power generated from renewable and/or carbon-free sources. Annual electricity consumption that utilizes renewable or carbon-free services shall be quantified using CEC-approved energy modeling software or CEC-approved calculation methodology and converted to MTCO₂e using Pacific Gas & Electric's alternative electricity service's latest carbon intensity factor.

With implementation of Mitigation Measure GHG-1, the proposed project would be required to install the applicable number of EV parking spaces per CALGreen Tier 2 requirements or provide GHG emissions reductions equivalent to the shortfall of EV parking spaces under the Tier 2 requirements. Therefore, the proposed project would comply with all BMPs identified for the 2022 Scoping Plan priority areas, and impacts would be **less than significant** with mitigation incorporated.

Significance with Mitigation. Less than significant.

b) Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Applicable plans adopted for the purpose of reducing GHG emissions include CARB's Scoping Plan and the Butte County Association of Governments' (BCAG's) Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS). A consistency analysis with these plans is presented below.

CARB Scoping Plan

CARB's latest Climate Change Scoping Plan outlines the State's strategies to reduce GHG emissions in accordance with the targets established under AB 32, SB 32, and AB 1279 (CARB 2022). The Scoping Plan is applicable to State agencies and is not directly applicable to cities/counties and individual projects. Though as described above, with implementation of Mitigation Measure GHG-1, the proposed project would comply with BMPs that are consistent with three primary objectives of the 2022 Scoping Plan: transportation electrification, VMT reduction, and building decarbonization to reduce impacts from GHG emissions to less than significant.

Statewide strategies to reduce GHG emissions in the 2022 Climate Change Scoping Plan include: implementing SB 100, which expands the RPS to 60 percent by 2030; expanding the Low Carbon

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Fuel Standards (LCFS) to 18 percent by 2030; implementing the Mobile Source Strategy to deploy zero-electric vehicle buses and trucks; implementing the Sustainable Freight Action Plan; implementing the Short-Lived Climate Pollutant Reduction Strategy, which reduces methane and hydrofluorocarbons to 40 percent below 2013 levels by 2030 and black carbon emissions to 50 percent below 2013 levels by 2030; continuing to implement SB 375; creating a post-2020 Cap-and-Trade Program; and developing an Integrated Natural and Working Lands Action Plan to secure California's land base as a net carbon sink.

Statewide strategies to reduce GHG emissions include the low carbon fuel standards, California Appliance Energy Efficiency regulations, California Renewable Energy Portfolio standard, changes in the CAFE standards, and other early action measures as necessary to ensure the State is on target to achieve the GHG emissions reduction goals of AB 32, SB 32, and AB 1279. In addition, new developments are required to comply with the current Building Energy Efficiency Standards and CALGreen. The proposed project would comply with these GHG emissions reduction measures since they are statewide strategies. The proposed project GHG emissions would be further reduced from compliance with statewide measures that have been adopted since AB 32, SB 32, and AB 1279 were adopted. Additionally, as concluded in Impact Discussion (a), the proposed project would be consistent with all 2022 Scoping Plan BMPs with implementation of Mitigation Measure GHG-1. Therefore, the proposed project would not obstruct implementation of the 2022 Scoping Plan, and impacts would be **less than significant**.

BCAG's Regional Transportation Plan/Sustainable Communities Strategy

BCAG adopted the 2024 RTP/SCS in December 2024 (BCAG 2024). BCAG's RTP/SCS identifies land use strategies that focus on innovative land use planning and transportation planning, planning for future roads to accommodate land uses at a regional level, and pedestrian-friendly roads and encourage bicycle trips and the use of the mass transportation system. The overarching strategy in the 2024 RTP/SCS is to allow Butte County to maintain, manage, and improve the region's transportation system over the next 20+ years. The 2024 RTP/SCS contains transportation projects to help more efficiently distribute population, housing, and employment growth as well as forecast development that is generally consistent with regional-level general plan data. The projected regional development pattern—when integrated with the proposed regional transportation network identified in the RTP/SCS—would reduce per-capita vehicular-travel-related GHG emissions and achieve the GHG reduction per-capita targets for the BCAG region. The RTP/SCS does not require that local general plans, specific plans, or zoning be consistent with the RTP/SCS, but provides incentives for consistency for governments and developers.

The proposed project would develop a new agricultural building for agricultural education classes at the adjacent Paradise HS campus in addition to a new practice field/stadium to accommodate existing events at the campus. The proposed project would not result in an increase in enrollment at the high school, nor would it result in an increase in vehicle trips.

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Additionally, the proposed project would allow new educational opportunities for the campus but not alter its function as a locally serving high school. The proposed project would therefore be consistent with the 2024 RTP/SCS and would not interfere with BCAG's ability to implement the regional strategies in 2024 RTP/SCS. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant.

3.7.5 Cumulative Impact Analysis

Project-related GHG emissions are not confined to a particular air basin but are dispersed worldwide. Therefore, impacts under Impact Discussions (a) and (b) are not project-specific impacts to global warming, but the proposed project's contribution to this cumulative impact.

Would the project have a cumulative effect related to greenhouse gas emissions?

While the proposed project would contribute to short-term and long-term increases in GHG emissions, with implementation of Mitigation Measure GHG-1 it would be consistent with CARB's 2022 Scoping Plan priority areas, which have been established for the purpose of achieving the State's climate goals. Compliance with the BMPs that promote these priority areas would reduce GHG impacts to a less-than-significant level for the proposed project. The proposed project is also consistent with other applicable state and local plans, including the BCAG's 2024 RTP/SCS as discussed in Impact Discussion (b). Cumulative development projects would similarly be required to comply with applicable State requirements and policies that promote reduction in GHG emissions. Therefore, cumulative GHG impacts of the proposed project would be less than significant.

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3.7 GREENHOUSE GAS EMISSIONS

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3.8 HAZARDS AND HAZARDOUS MATERIALS

This section evaluates the potential impacts of the Paradise High School Expansion Project (proposed project) on human health and the environment due to exposure to hazardous materials or conditions associated with the project site, project construction, and project operations. Potential project impacts and appropriate mitigation measures or standard conditions are included, as necessary. The analysis in this section is based in part on the following technical report:

- *Phase I Environmental Site Assessment: New School Facility Northwest of Elliott Rd and Maxwell Dr, Paradise, Butte County, CA*, Padre Associates, January 2026

A complete copy of this technical report is provided in Appendix E of this DEIR.

Hazardous materials refer generally to hazardous substances that exhibit corrosive, poisonous, flammable, and/or reactive properties and have the potential to harm human health and/or the environment. Hazardous materials can include petroleum, natural gas, synthetic gas, acutely toxic chemicals, and other toxic chemicals that are used in agriculture, commercial, and industrial uses; businesses; hospitals; schools; and households (such as cleaners, solvents, paints, and pesticides). Accidental releases of hazardous materials can occur from a variety of causes, including but not limited to traffic accidents, shipping accidents, and industrial/warehouse incidents.

During the Notice of Preparation (NOP) public review period, one comment letter was received from the Department of Toxic Substances Control (DTSC) regarding potential impacts associated with hazards and hazardous materials. The NOP is included as Appendix A of this DEIR.

3.8.1 Regulatory Framework

Federal, state, and local laws, regulations, plans, or guidelines related to hazards and hazardous materials that apply to the proposed project are summarized in this section.

FEDERAL

United States Environmental Protection Agency

The United States Environmental Protection Agency (EPA) is the primary federal agency that regulates hazardous materials and waste. In general, the EPA works to develop and enforce regulations that implement environmental laws enacted by Congress. The agency is responsible for researching and setting national standards for a variety of environmental programs, and it delegates to states and tribes the responsibility for issuing permits and for monitoring and enforcing compliance. EPA programs promote handling hazardous waste safely, cleaning up

3.8 HAZARDS AND HAZARDOUS MATERIALS

contaminated land, and reducing trash. Under the authority of the Resource Conservation and Recovery Act (RCRA) and in cooperation with state and tribal partners, the EPA's Waste Management Division manages a hazardous waste program, an underground storage tank (UST) program, and a solid waste program that includes development of waste reduction strategies such as recycling.

Title 26, Part 1926 of the Code of Federal Regulations

Title 26, Part 1926 of the Code of Federal Regulations (CFR) establishes standards for general safety and health provisions, occupational health and environmental controls, demolition, toxic and hazardous substances, and other aspects of construction work. For example, it establishes standards for general safety and health, such as development and maintenance of an effective fire protection and prevention program at jobsites. It also establishes standards for occupational health and environmental controls, such as for exposure to lead and asbestos.

Comprehensive Environmental Response, Compensation and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) protects water, air, and soil resources from the risks created by past chemical disposal practices. This law is also called the Superfund Act and regulates sites on the National Priority List (NPL), which are called Superfund sites. The act was intended to encompass the prevention of and response to uncontrolled hazardous substances releases. It provides mechanisms for reacting to emergencies and chronic hazardous material releases. In addition to procedures to prevent and remedy problems, it established a system for compensating appropriate individuals and assigning appropriate liability. It is designed to plan for and respond to failure in other regulatory programs and remedy problems resulting from action taken before the era of comprehensive regulatory protection.

Emergency Planning and Community Right-to-Know Act

The Emergency Planning and Community Right-to-Know Act (EPCRA), enacted in October 1986 as Title III of the Superfund Amendments and Reauthorization Act (SARA), mandates that state and local entities develop comprehensive systems to prepare for and respond to chemical emergencies. Rather than the infrastructure itself, the responsibility for this planning lies with designated human authorities, specifically State Emergency Response Commissions (SERCs) and Local Emergency Planning Committees (LEPCs). These bodies, in coordination with facility owners and operators, are required to establish response strategies and maintain transparent reporting mechanisms to ensure communities are protected from hazardous substance releases. Reported information is made publicly available so that interested parties can be informed about potentially dangerous chemicals in their community. EPCRA Sections 301 through 312 are administered by the EPA's Office of Emergency Management. The EPA's Office of Information Analysis and Access implements the program in EPCRA Section 313. In California,

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Superfund Amendments and Reauthorization Act Title III is implemented through the California Accidental Release Prevention program.

Toxic Substances Control Act

The Toxic Substances Control Act (TSCA) of 1976 gives the EPA the authority to require reporting, record-keeping, testing requirements, and restrictions related to chemical substances and/or mixtures. TSCA addresses the production, importation, use, and disposal of specific chemicals, including polychlorinated biphenyls (PCBs), asbestos, radon, and lead-based paint. Title IV of the TSCA directs the USEPA to regulate lead-based paint hazards.

TSCA Sections 402 and 404 require those engaged in lead abatements, risk assessments, and inspections in homes or child-occupied facilities before 1978 (such as in daycare centers and kindergartens) to be trained and certified in specific practices to ensure accuracy and safety. TSCA Section 403, Residential Hazard Standards for Lead in Paint, Dust, and Soil, sets standards for dangerous lead levels in paint, household dust, and residential soil.

Hazardous Materials Transportation Act

The US Department of Transportation regulates hazardous materials transportation under CFR Title 49. State agencies that have primary responsibility for enforcing federal and state regulations and responding to hazardous materials transportation emergencies are the California Highway Patrol and the California Department of Transportation. The California State Fire Marshal's Office has oversight authority for hazardous materials liquid pipelines. The California Public Utilities Commission has oversight authority for natural gas pipelines. These agencies also govern permitting for hazardous materials transportation.

Federal Response Plan

The Federal Response Plan of 1999 is a signed agreement among 27 federal departments and agencies and other resource providers, including the American Red Cross, that: (1) provides the mechanism for coordinating delivery of federal assistance and resources to augment efforts of state and local governments overwhelmed by a major disaster or emergency; (2) supports implementation of the Robert T. Stafford Disaster Relief and Emergency Act as well as individual agency statutory authorities; and (3) supplements other federal emergency operations plans developed to address specific hazards. The Federal Response Plan is implemented in anticipation of a significant event likely to result in a need for federal assistance or in response to an actual event requiring federal assistance under a Presidential declaration of a major disaster or emergency. The Federal Response Plan is part of the National Response Framework, which was most recently updated in October 2019.

3.8 HAZARDS AND HAZARDOUS MATERIALS

Occupational Safety and Health Administration

The federal Occupational Safety and Health Act of 1970 authorizes each state (including California) to establish its own safety and health programs with the U.S. Department of Labor, Occupational Safety and Health Administration's (OSHA) approval. The California Department of Industrial Relations regulates implementation of worker health and safety in California. Cal/OSHA enforcement units conduct on-site evaluations and issue notices of violation to enforce necessary improvements to health and safety practices. California standards for workers dealing with hazardous materials are in Title 8 of the California Code of Regulations (CCR); they include practices for all industries (General Industrial Safety Orders) and specific practices for construction and other industries. Workers at hazardous waste sites (or working with hazardous waste that might be encountered during excavation of contaminated soil) must receive specialized training and medical supervision according to the Hazardous Waste Operations and Emergency Response regulations.

OSHA Regulation 29 CFR Standard 1926.62 regulates the demolition, renovation, or construction of buildings involving lead materials. Federal, state, and local requirements also govern the removal of asbestos or suspected asbestos-containing materials (ACM), including the demolition of structures where asbestos is present. All friable (crushable by hand) ACMs and nonfriable ACMs subject to damage must be abated following all applicable regulations and prior to demolition.

Resource Conservation and Recovery Act

Federal hazardous waste laws are generally promulgated under the Resource Conservation and Recovery Act (RCRA) of 1976, as amended by the Hazardous and Solid Waste Amendments of 1984. These laws provide for the "cradle to grave" regulation of hazardous wastes. Any business, institution, or other entity that generates hazardous waste is required to identify and track its hazardous waste from the point of generation until it is recycled, reused, or disposed. The DTSC is responsible for implementing the RCRA program as well as California's own hazardous waste laws.

STATE

California Environmental Protection Agency

CalEPA was created in 1991 by governor's executive order. Under the CalEPA umbrella are six boards and departments—Air Resources Board; Department of Resources, Recycling, and Recovery; Department of Pesticides Regulations; DTSC; Office of Environmental Health Hazard Assessment; and State Water Resources Control Board—to create a cabinet-level voice for the protection of human health and the environment and to ensure the coordinated deployment of state resources. CalEPA oversees the unified hazardous waste and hazardous materials management regulatory program.

3.8 HAZARDS AND HAZARDOUS MATERIALS

California Department of Toxic Substances Control

DTSC is a department of CalEPA, which authorizes DTSC to administer the RCRA program in California to protect people from exposure to hazardous waste. The department regulates hazardous waste, cleans up existing contamination, and implements regulations to control and reduce the hazardous waste produced in California, primarily under the authority of RCRA and in accordance with the California Hazardous Waste Control Law (California Health and Safety Code [HSC], Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (22 CCR Divisions 4 and 4.5). Permitting, inspection, compliance, and corrective action programs ensure that people who manage hazardous waste follow state and federal requirements and other laws that affect hazardous waste specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning.

DTSC's Brownfields Restoration and School Evaluation Branch is responsible for assessing, investigating, and cleaning up proposed and existing school sites. The oversight is to ensure that selected properties are free of contamination or, if the properties were previously contaminated, that they have been cleaned up to a level that protects the students and staff who will occupy the new school. All proposed school sites and existing school sites that will receive State funding for acquisition or construction are required to go through an environmental review and cleanup process under DTSC's oversight.

Government Code Section 65962.5 (Cortese List)

Government Code Section 65962.5 requires, among other items, that the DTSC compile and update as appropriate, but at least annually, a list (Cortese List) of the following sites and submit the list to the Secretary for Environmental Protection.

- All hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code.
- All land designated as hazardous waste property or border zone property pursuant to former Article 11 (commencing with Section 25220) of Chapter 6.5 of Division 20 of the Health and Safety Code.
- All information received by the Department of Toxic Substances Control pursuant to Section 25242 of the Health and Safety Code on hazardous waste disposals on public land.
- All sites listed pursuant to Section 25356 of the Health and Safety Code.

Government Code Section 65962.5 also requires:

- (b) The State Department of Health Services shall compile and update as appropriate, but at least annually, and shall submit to the Secretary for Environmental Protection, a list of all public drinking water wells that contain detectable levels of organic contaminants and that are subject to water analysis pursuant to Section 116395 of the Health and Safety Code.

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- (c) The State Water Resources Control Board shall compile and update as appropriate, but at least annually, and shall submit to the Secretary for Environmental Protection, a list of all of the following:
 - All underground storage tanks for which an unauthorized release report is filed pursuant to Section 25295 of the Health and Safety Code.
 - All solid waste disposal facilities from which there is a migration of hazardous waste and for which a California regional water quality control board has notified the Department of Toxic Substances Control pursuant to subdivision (e) of Section 13273 of the Water Code.
 - All cease and desist orders issued after January 1, 1986, pursuant to Section 13301 of the Water Code, and all cleanup or abatement orders issued after January 1, 1986, pursuant to Section 13304 of the Water Code, which concern the discharge of wastes that are hazardous materials.
- (d) The local enforcement agency, as designated pursuant to Section 18051 of Title 14 of the California Code of Regulations, shall compile as appropriate, but at least annually, and shall submit to the Department of Resources Recycling and Recovery, a list of all solid waste disposal facilities from which there is a known migration of hazardous waste. The Department of Resources Recycling and Recovery shall compile the local lists into a statewide list, which shall be submitted to the Secretary for Environmental Protection and shall be available to any person who requests the information.

California Occupational Health and Safety Administration

Occupational safety standards in federal and state laws minimize worker safety risks from both physical and chemical hazards in the workplace. Cal/OSHA is responsible for developing and enforcing workplace safety standards and ensuring worker safety in the handling and use of hazardous materials.

California Building Code

The State of California provides a minimum standard for building design through the California Building Code (CBC), which is in 24 CCR Part 2. The 2025 California Building Standards Code (Title 24), effective as of January 1, 2026, serves as the comprehensive regulatory framework for building design and construction across the state, prioritizing seismic safety, energy efficiency, and occupant wellness. The CBC, as adopted by local cities or counties, may be further modified based on local conditions.

California Department of Forestry and Fire Protection

California Department of Forestry and Fire Protection (CAL FIRE) is dedicated to the fire protection and stewardship of over 31 million acres of California's wildlands. The Office of the State Fire Marshal (OSFM) supports CAL FIRE's mission to protect life and property through fire

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prevention engineering programs, law and code enforcement, and education. OSFM provides fire prevention by enforcing fire-related laws in state-owned or -operated buildings; investigating arson fires; licensing those who inspect and service fire protection systems; approving fireworks for use in California; regulating the use of chemical flame retardants; evaluating building materials against fire safety standards; regulating hazardous liquid pipelines; and tracking incident statistics for local and state government emergency response agencies. The California Fire Plan is the state's road map for reducing the risk of wildfire through planning and prevention to reduce firefighting costs and property losses, increase firefighter safety, and contribute to ecosystem health. The California Fire Plan is a cooperative effort between the State Board of Forestry and Fire Protection and CAL FIRE.

California Fire Code

The California Fire Code (CFC) is in 24 CCR Part 9. It is also updated every three years, most recently in 2025 with an effective date of January 1, 2026. The 2025 CFC is based on the 2024 International Fire Code but has been modified for California conditions. The CFC includes provisions and standards for emergency planning and preparedness, fire service features, fire protection systems, hazardous materials, fire flow requirements, and fire hydrant locations and distribution. Similar to the CBC, the CFC is generally adopted on a jurisdiction-by-jurisdiction basis, subject to further modification based on local conditions.

California Governor's Office of Emergency Services

The California Governor's Office of Emergency Services (Cal OES) coordinates California's statewide response to disasters by managing the State Operations Center, directing mutual aid systems, and ensuring emergency agencies can support one another across jurisdictions. It oversees public safety communications, including 911 systems and deployable communication units, while also handling homeland security programs related to terrorism prevention, cybersecurity, and critical infrastructure protection. The agency leads disaster recovery by coordinating FEMA assistance and administering relief programs, and it works to reduce future risks through hazard mitigation projects. Additionally, Cal OES provides emergency management training, develops statewide emergency plans, and supports preparedness efforts for state, county, and local agencies.

Hazardous Materials Management Act

A hazardous material is any substance that possesses qualities or characteristics that could produce physical damage to the environment and/or cause deleterious effects upon human health. The Hazardous Materials Management Act (Title 22 of the CCR) requires that businesses and public entities handling or storing certain amounts of hazardous materials prepare a hazardous materials business plan that includes an inventory of hazardous materials stored on-site (above specified quantities), an emergency response plan, and an employee training program. Businesses that use, store, or handle 55 gallons of liquid, 500 pounds of solid, or 200

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cubic feet of compressed gas at standard temperature and pressure require a hazardous materials business plan. Plans must be prepared prior to facility operation and are reviewed/updated biennially (or within 30 days of a change).

California Accidental Release Prevention Program

California Accidental Release Prevention Program includes the Federal Accidental Release Prevention Program with certain additions specific to California and pursuant to HSC Article 2, Chapter 6.95. The purpose of this program is to prevent the accidental release of regulated substances. Businesses using regulated substances exceeding a threshold quantity are evaluated under this program to determine the potential for and impacts of accidental releases. Depending on the potential hazards, business owners may be required to develop and submit a risk management plan.

California Health and Safety Code and Code of Regulations

California HSC Chapter 6.95 and 19 CCR Section 2729 set out the minimum requirements for business emergency plans and chemical inventory reporting. A business that uses hazardous materials or a mixture containing hazardous materials must establish and implement a business plan if the hazardous material is handled in certain quantities. These regulations require businesses to provide emergency response plans and procedures, training program information, and a hazardous material chemical inventory disclosing hazardous materials stored, used, or handled on-site.

REGIONAL

2024 Butte County Local Hazard Mitigation Plan

The purpose of the 2024 Butte County Local Hazard Mitigation Plan (LHMP) and hazard mitigation planning process is to reduce or eliminate long-term risk to people and property, critical facilities and infrastructure, natural and historic and cultural resources, and other community assets from future hazard events and natural disasters. The Butte County Planning Area is vulnerable to numerous hazards that are identified, profiled, and analyzed in the 2024 LHMP. Wildfires, floods, earthquakes, drought, dam failure, and other severe weather events are among the hazards that can have a significant impact on the Planning Area.

LOCAL

1994 Town of Paradise General Plan

The existing General Plan for the Town of Paradise (Paradise 2008, 2022) was written before the 2018 Camp Fire and lists several goals, policies, objectives, and implementation measures related to hazards and hazardous waste. Specifically, the purpose of the Safety Element is to

3.8 HAZARDS AND HAZARDOUS MATERIALS

reduce the risk of death, injuries, property damage, and other economic and social consequences associated with natural and societal hazards.

Goals

SG-2: Provide adequate access, including emergency vehicle access and evacuation to all new parcels and existing parcels where feasible.

SG-3: Strive to protect the Paradise community from injury, loss of life and property damage resulting from catastrophes and hazardous conditions.

SG-4: Strive to reduce the impact of pollutants on the wellbeing of Paradise citizens

SG-6: Improve the communication system(s) used during townwide emergencies, such as wildland fires, earthquakes or volcanic occurrences.

SG-7: Provide for the safe disposal and handling of toxic and hazardous waste.

SG-8: Direct and promote hazardous waste management practices and technologies that will, in order of priority:

- Reduce the use of hazardous substances and the generation of hazardous wastes at their source;
- Recover and recycle the remaining waste for reuse to the extent feasible
- Treat those wastes not amenable to source reduction or recycling so that the environment and community health are not harmed by their ultimate uses or disposal;
- Ensure the safe transportation and disposal of treated hazardous waste residuals in repositories made secure from liquids that might create a toxic leachate and contaminate groundwater

SG-9: Reduce the need for additional hazardous waste disposal sites

Policies

- **SP-2.** Through the development review process, adequate roads shall be required to be constructed and/or improved for emergency vehicle access, practically in high wildland fire hazard areas.

Town of Paradise Emergency Operations Plan 2022

The Town of Paradise Emergency Operations Plan (EOP) establishes an Emergency Management Organization and assigns functions and tasks consistent with California's Standardized Emergency Management Systems (SEMS) and the National Incident Management System (NIMS). Both systems provide for the integration and coordination of efforts within the town.

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These systems were adopted by both the state and federal government following disasters where lack of coordination resulted in greater losses than necessary. It is valuable to the Town of Paradise that our plan works in conjunction with SEMS and NIMS.

3.8.2 Existing Conditions

ON-CAMPUS AND ADJACENT USES

The project site is currently vacant and previously held the First Assembly of God Church, associated parking lot, and multiple residential structures that burned down during the 2018 Camp Fire. The surrounding land uses near the project site consist of Paradise HS to the north and established residential neighborhoods characterized by single-family homes. The hardscape parking lot remains on the eastern part of the project site, and storage containers are in the center part of the project site. The remaining area on the west side has no structures. The project site is near the southern boundary of the Paradise HS campus and includes five parcels. The proposed project would use two parcels for the new parking lot; two parcels for the new football stadium, which will also be used as practice fields; and one parcel for the new agricultural building.

SITE HISTORY

Based on historical aerial photographs, the subject property has been developed for multiple uses since at least 1947. Developments across the subject property have included an orchard (1952 aerial photograph), residential (since at least 1947), and commercial (a church since 1984). All structures were destroyed in the 2018 Camp Fire. The State Incident Management Team (IMT) completed final on-site reviews of the subject property parcels and concluded that all site assessment activities; debris and soil removal; and confirmation soil sampling was complete. Therefore, the State IMT recommendations to Butte County included that the debris removal program objectives had been met. Butte County confirmed the completion of cleanup activities for the constituent parcels between July 2019 and January 2020. The property is bordered to the north by Paradise High School, east and west by residential properties, and south by the Paradise Cemetery District. A review of the Environmental Data Resources Radius Map Report did not identify any facilities in the database records search within a one-mile radius that present a recognized environmental condition (REC) to the property.

HAZARDOUS MATERIALS SITE DATABASE SEARCH

A review of six databases from federal, state, and local environmental regulatory agencies was conducted to identify properties near the project site with reported unauthorized releases of hazardous materials and to identify properties that use, generate, store, treat, or dispose of hazardous materials and chemicals or release hazardous materials which may impact the campus. The databases searched and the findings regarding the campus and adjacent properties are presented below.

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- GeoTracker: State Water Resources Control Board (SWRCB 2026)
- EnviroStor: Department of Toxic Substances Control (DTSC 2026a)
- EnviroMapper: US Environmental Protection Agency (USEPA 2026)
- Solid Waste Information System (SWIS): California Department of Resources Recovery and Recycling (CalRecycle 2026)
- Cortese List: Department of Toxic Substances Control (DTSC 2026b)
- CalEPA: California EPA (CalEPA 2026)

No hazardous materials sites were listed on the project site or near the project site, with the exception that Paradise High School was listed as a generator.

HAZARDOUS BUILDING MATERIALS AND CHEMICAL STORAGE AREAS

State and federal agencies regulate removal, abatement, and transport procedures for ACMs. These regulations prohibit releases of asbestos from industrial, demolition, or construction activities not permitted, and medical evaluation and monitoring are required for employees performing actions that could expose them to asbestos. Additionally, the rules include warnings and practices that must be followed to reduce the risk of asbestos emissions and exposure. Finally, federal, State, and local agencies must be notified before the onset of demolition or construction activities with the potential to release asbestos.

ACMs were commonly used in a wide variety of building products before 1980, such as roofing shingles, composite siding, linoleum flooring, acoustic ceiling tiles, furnace, water heater exhaust piping and insulation, glues and mastics, stucco, joint compounds, and composite wallboards. ACMs can be divided into friable materials (easily crumbled or reduced to powder) and nonfriable. Friable ACMs are regulated as hazardous materials due to the elevated long-term risk of developing lung cancer. They must be properly removed before the renovation or demolition of any structure containing them.

Lead-based paints (LBP) were commonly used until 1978, when they were phased out. ACMs, LBP, and other building materials containing lead (e.g., ceramic tile) were likely used to construct the on-site structure in the 1960s. None of the buildings on the Paradise HS campus were constructed prior to 1999.

The project site is currently vacant of buildings, though the hardscape parking lot remains on the eastern part of the project site. Storage containers are in the center part of the project site.

STORAGE TANKS

No aboveground storage tanks (ASTs), USTs, or septic tanks are recorded for the project site.

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Airport Hazards

The nearest public-use airport is Paradise Airport, approximately 3.7 miles south of the project site. The project site is not within any of the safety zones of Paradise Airport.

Wildfire

Wildland fire protection in California is the responsibility of either the local government, state government, or the federal government. State Responsibility Areas (SRA) are the areas in the state where the State of California has the primary financial responsibility for the prevention and suppression of wildland fires. The SRA covers more than 31 million acres, to which the California Department of Forestry and Fire Protection (CAL FIRE) provides a basic level of wildland fire prevention and protection services.

Local responsibility areas (LRA) include incorporated cities, cultivated agricultural lands, and portions of the desert. LRA fire protection is typically provided by city fire departments, fire protection districts, counties, and by CAL FIRE under contract to local government. CAL FIRE uses an extension of the SRA Fire Hazard Severity Zone model as the basis for evaluating fire hazard in LRAs. The local responsibility area hazard rating reflects flame and ember intrusion from adjacent wildlands and from flammable vegetation in the urban area. Fire Hazard Severity Zones (FHSZ) are identified by Moderate, High and Very High in an SRA, and Very High in an LRA.

According to CAL FIRE's Fire Hazard Severity Zone in LRA Viewer, the project site is in a LRA and a Very High FHSZ (CALFIRE 2026).

3.8.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact related to hazards and hazardous materials if it would:

- a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
- b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

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- c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substance, or waste within one-quarter mile of an existing or proposed school.
- d) Be located on a site that is included on a list of hazardous materials compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.
- e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard or excessive noise for people residing or working in the project area.
- f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
- g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

METHODOLOGY

To determine the presence or absence of hazards or hazardous materials on the project site, a review was conducted of relevant federal, state, and local databases, including CalEPA, CalRecycle, GeoTracker, Cortese List, EnviroStor, and EnviroMapper. These sources were evaluated to assess whether the project site has been previously identified as containing hazardous materials.

3.8.4 Project Impact Analysis

-
- a) **Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**
-

CONSTRUCTION

Small amounts of commonly used hazardous substances, such as gasoline, diesel fuel, lubricating oil, grease, glues, and solvents would be used and transported to the Paradise HS campus during construction of the proposed project. These materials are used routinely for similar types of construction projects, and the use of these materials would be temporary during construction activities of the Proposed Project. Any potential spills or leakage of petroleum products during construction activities are required to be immediately contained, the hazardous material identified, and the material remediated in compliance with applicable state and local regulations for the cleanup and disposal of that contaminant. All contaminated

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waste encountered would be required to be collected and disposed of at an appropriately licensed disposal or treatment facility.

Federal, state, and local regulations govern the disposal of waste identified as hazardous that could be produced during removal of existing asphalt and storage buildings, as well as during construction activities. All materials would be handled, transported, used, and disposed of in accordance with all federal, state, and local laws regulating the management and use of hazardous materials, including the federal RCRA, which includes requirements for hazardous solid waste management; the DTSC Environmental Health Standards for the Management of Hazardous Waste (22 CCR Division 4.5), which include standards for generators and transporters of hazardous waste; Butte County Air Quality Management District Rules governing work practice requirements for renovation and demolition activities; and Cal/OSHA, which includes standards for workplace health and safety. Furthermore, strict adherence to all emergency response plan requirements set forth by the Town of Paradise and Butte County Fire Department would be required through the duration of the proposed project's construction. Therefore, impacts related to the routine transport, use, or disposal of hazardous materials during construction of the proposed project would be **less than significant**.

OPERATION

Operation of the proposed project would transport, use, store, and dispose of small amounts of hazardous materials typical of school facilities such as cleaning and maintenance supplies (e.g., cleaners, gasoline, paint, pesticides). The proposed project would consist of a new livestock farming area and barn, new parking lot, and a new football stadium and practice sports field. No manufacturing, industrial, or other uses using large amounts of hazardous materials would occur within the project site. Compliance with applicable federal and state laws and regulations governing the use, storage, transport, and disposal of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts to occur. Therefore, impacts related to the routine transport, use, or disposal of hazardous materials during construction of the proposed project would be **less than significant**.

Significance without Mitigation: Less than significant.

b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Construction activities would require small amounts of hazardous materials, including vehicle fuels, lubricants, grease, and transmission fluids as well as paints and coatings. The use, transportation, and disposal of hazardous materials would be in compliance with regulatory standards and manufacturers' specifications. Hazardous materials would be used in small

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quantities and stored so they do not pose significant safety hazards. Operation of the proposed project would transport, use, store, and dispose of small amounts of hazardous materials typical of school facilities such as cleaning and maintenance supplies (e.g., cleaners, gasoline, paint, pesticides). Operation of the proposed project would use cleaners and other chemicals in relatively small quantities, which is not typically considered hazardous materials that could result in a significant hazard to the public or the environment.

A Phase I Environmental Site Assessment was performed by Padre Associates and identified the potential for RECs (Appendix E). The following RECs were identified based on the findings of the Phase I ESA and the requirements of DTSC for school sites:

- The potential for arsenic and organochlorine pesticides (OCPs) in soil associated with the former presence of an orchard in the eastern portion of the project site for the years between 1947 and the early 1950s.
- The potential for OCPs in soil from the application of termiticides associated with former building structures on the site from at least 1947 through 2018.

Therefore, impacts associated with reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment are **potentially significant**.

To ensure environmental safety, and compliance with the requirements of DTSC for school sites, the District would implement Mitigation Measure HAZ-1, which would require the preparation of a Preliminary Endangerment Assessment (PEA) to evaluate the potential for hazardous substances associated with the former presence of an orchard in the eastern portion of the project site and the former presence of building structures. As part of the PEA, at select locations, surface and shallow surface soils will be collected and sampled for the presence of arsenic and OCPs. If determined necessary based on results of soil sampling, the PEA will include remediation requirements that will be implanted prior to development of the project site. The District is committed to collaborating with the DTSC to fully comply with all required site cleanup procedures.

Significance without Mitigation: Potentially significant.

Impact HAZ-1: In the event RECs within the soil exceed applicable screening or action levels established by DTSC, reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment could occur.

Mitigation Measure HAZ-1: Upon completion of a PEA (soil sampling), the report shall be submitted to the California Department of Toxic Substances Control (DTSC) for review and approval of the report's conclusions and recommendations. If the report concludes that potential contaminants of concern have not been identified at or above the regulatory screening levels, then the report shall recommend that DTSC provide the

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District with a “No Further Action” letter of determination for the project site. If the report concludes that contaminants of concern have been identified above regulatory screening levels, then the report shall recommend further assessment. Depending on the extent of soil contamination identified, a remediation plan may be required to protect human health and the environment. The District shall enter into an environmental oversight agreement with DTSC to ensure that all applicable local, state, or federal regulations are followed during the remediation process. The remedial actions shall be implemented and completed before construction is completed and prior to occupancy.

In the event RECs in the soil exceed applicable screening or action levels established by DTSC, Mitigation Measure HAZ-1 would ensure the recommendations and remediation measures of the PEA are implemented.

Significance with Mitigation: Less than significant.

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substance, or waste within one-quarter mile of an existing or proposed school?

Paradise High School is located immediately adjacent to the project site, and Ridgeview High School is located approximately 0.3 mile to the east. Construction and operation of the proposed project would involve the use of small quantities of hazardous materials such as fuels, lubricants, paints, and cleaning agents.

During construction, short-term use of hazardous materials and the potential disturbance of soil could result in limited emissions (e.g., dust). A Phase I Environmental Site Assessment identified RECs, including the potential presence of arsenic and OCPs in soil associated with historic orchard use and termiticide application. To address these conditions, a PEA is being conducted under the oversight of the DTSC. If contamination is identified at levels of concern, appropriate remediation or management measures would be implemented prior to site disturbance. These measures would minimize the potential for exposure to contaminated soil or dust during construction, including for nearby school populations.

During operation, the project would involve the use and storage of common hazardous materials typical of school facilities (e.g., cleaning agents, maintenance supplies, and fuels) in small quantities. These materials would be handled in compliance with applicable federal, state, and local regulations and would not result in substantial emissions or risk to nearby schools.

With compliance with regulatory requirements and implementation of DTSC oversight and any required remediation, the project would not emit hazardous emissions or handle hazardous

3.8 HAZARDS AND HAZARDOUS MATERIALS

materials in a manner that would pose a significant risk to existing or nearby schools. Therefore, impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

d) Would the project be located on a site that is included on a list of hazardous materials compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?

California Government Code Section 65962.5 (Cortese List) requires identification of sites included on lists of hazardous materials releases compiled by state agencies. A records search was conducted using applicable regulatory databases, including EnviroStor, GeoTracker, the Cortese List, and the Solid Waste Information System.

The records search did not identify the project site as being included on any list compiled pursuant to Government Code Section 65962.5. Therefore, the project site is not considered a listed hazardous materials site.

A nearby property at 5892 Maxwell Drive, approximately 100 feet east of the project site, has been identified by the DTSC for further evaluation due to the presence of dieldrin in soil above screening levels. However, this site is downgradient of the project site and is not expected to have adversely affected soil or groundwater conditions at the project site. In addition, Ridgeview Continuation High School (5944 Maxwell Drive), approximately 500 feet northeast of the project site, received a DTSC No Further Action determination in April 2021.

Although the project site is not included on a Cortese List, a Phase I Environmental Site Assessment identified potential RECs associated with historic site uses. These conditions would be addressed through further investigation, and any required remediation would be under DTSC oversight, as described in Section (b).

Because the project site is not included on a list compiled pursuant to Government Code Section 65962.5 and nearby sites are not expected to affect the project site, the project would not create a significant hazard to the public or environment as a result of being located on such a site. Therefore, impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

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-
- e) **For a project within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?**
-

The project site is not within an airport land use plan and there are no public airports or private airstrips within two miles of the site. The nearest airport to the project site is Paradise Airport, approximately 3.7 miles to the south. Therefore, **no impact** would occur.

Significance without Mitigation: No impact.

-
- f) **Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**
-

The SEMS and the Town of Paradise EOP establish procedures for coordinated emergency response and evacuation within the Town of Paradise.

The proposed project would not result in permanent changes to the local roadway network or alter designated emergency response or evacuation routes. During construction, temporary and intermittent lane closures or access restrictions could occur; however, access for emergency vehicles would be maintained at all times in accordance with applicable fire and police department requirements. Construction activities would be temporary and would not substantially affect emergency response times or evacuation capabilities.

Operation of the proposed project would not generate traffic volumes or site conditions that would interfere with emergency access or evacuation. The project site would continue to be served by existing roadways and emergency service providers, including the Paradise Fire Department and Paradise Police Department.

Because the project would not physically alter or obstruct emergency access routes, interfere with emergency response operations, or impair implementation of the Town's EOP or applicable evacuation plans, impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

-
- g) **Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?**
-

As discussed in Section 3.15, *Wildfire*, the project site, is in a Very High FHSZ in an LRA as designated by CAL FIRE. Development in this area is subject to stringent building and fire protection requirements intended to reduce wildfire risk.

The proposed project would be required to comply with applicable state and local regulations, including Chapter 7A of the California Building Code (24 CCR Part 2), which establishes fire-

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resistant construction standards for buildings in wildfire-prone areas, and Chapter 49 of the California Fire Code (24 CCR Part 9), which includes requirements for defensible space, fuel modification, fire apparatus access, water supply, and fire protection systems. The proposed project would also be required to meet Town of Paradise standards for fire flow, hydrant placement, and emergency access. Compliance with these requirements would reduce the potential for structure ignition, limit fire spread, and ensure adequate emergency access for firefighting and evacuation. The project would not substantially alter existing emergency access routes or evacuation conditions and would not exacerbate wildfire risk in the surrounding area. Therefore, the project would not expose people or structures to a significant increased risk of loss, injury, or death involving wildland fires. Impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

3.8.5 Cumulative Impact Analysis

Would the project have a cumulative effect related to hazards and hazardous materials?

As defined in Section 15130 of the State CEQA Guidelines, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, present, and reasonably foreseeable future projects. For hazards and hazardous materials, the cumulative context is generally local, including the project site and surrounding area within the Town of Paradise.

Hazards and hazardous materials impacts are typically site specific and limited in geographic extent. The proposed project involves the use of small quantities of hazardous materials typical of school facilities and would be subject to federal, state, and local regulations governing the use, storage, transport, and disposal of such materials. In addition, identified RECs at the project site would be addressed through site investigation and any required remediation under regulatory oversight, as described in Section 3.7.

While other projects in the surrounding area may also involve the use of hazardous materials, each project would be required to comply with applicable regulatory requirements and conduct site-specific investigations, as necessary. Compliance with these requirements would reduce the potential for hazardous materials releases or exposure such that impacts would not be cumulatively considerable.

Because hazardous materials impacts are generally site-specific, and because regulatory compliance and site-specific remediation would minimize the potential for releases or exposure, the proposed project would not contribute to a cumulatively considerable impact related to hazards and hazardous materials. Therefore, the proposed project would not have a cumulative effect related to hazards and hazardous materials, and this impact is **less than significant**.

3.8 HAZARDS AND HAZARDOUS MATERIALS

Significance without Mitigation: Less than significant.

3.8.6 References

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3.9 HYDROLOGY AND WATER QUALITY

This section of the Draft Environmental Impact Report (DEIR) evaluates the potential impacts of the proposed project to hydrology and water quality conditions. Hydrology deals with the distribution and circulation of water, both on land and underground. Water quality deals with the quality of surface- and groundwater. Surface water includes lakes, rivers, streams, and creeks; groundwater is under the earth's surface.

During the Notice of Preparation (NOP) public review period, one comment was received from a nearby resident regarding potential hydrology and water quality impacts associated with the proposed project. The NOP is included as Appendix A of this DEIR.

3.9.1 Regulatory Framework

Federal, state, and local laws, regulations, plans, or guidelines related to hydrology and water quality are summarized in this section.

FEDERAL

Clean Water Act

The Clean Water Act (CWA) is a 1977 amendment to the Federal Water Pollution Control Act of 1972. The CWA is the principal statute governing water quality. It establishes the basic structure for regulating discharges of pollutants into the waters of the United States¹ and gives the federal Environmental Protection Agency (EPA) the authority to implement pollution-control programs, such as setting wastewater standards for industry. The statute's goal is to end all discharges entirely and to restore, maintain, and preserve the integrity of the nation's waters. The CWA regulates both the direct and indirect discharge of pollutants into the nation's waters. The CWA sets water quality standards for all contaminants in surface waters and makes it unlawful for any person to discharge any pollutant from a point source into navigable waters, unless a permit is obtained under its provisions. The CWA mandates permits for wastewater and stormwater discharges, requires states to establish site-specific water quality standards for navigable bodies of water, and regulates other activities that affect water quality, such as dredging and the filling of wetlands. The CWA also funded the construction of sewage treatment plants and recognized the need for planning to address nonpoint sources of pollution. The following CWA sections assist in ensuring water quality in surrounding water bodies.

¹ Waters of the US generally include surface waters—lakes, rivers, streams, bays, the ocean, dry streambeds, wetlands—and storm sewers that are tributary to any surface water body.

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- **Section 208** of the CWA requires the use of best management practices (BMPs) to control discharge of pollutants in stormwater during construction.
- **Section 303(d)** requires creation of a list of impaired water bodies by states, territories, and authorized tribes; evaluation of lawful activities that may impact impaired water bodies;² and preparation of plans to improve the quality of these water bodies. Water bodies on the list do not meet water quality standards, even after point sources of pollution have installed the minimum required levels of pollution-control technology.
- **Section 402(p)** establishes a framework to control water pollution by regulating point-source discharges under the National Pollutant Discharge Elimination System (NPDES) permit program. Point-source discharges are readily identifiable, discrete inputs where waste is discharged to the receiving waters from a pipe or drain. Nonpoint discharges occur over a wide area and are associated with particular land uses (such as urban runoff from streets and stormwater from construction sites).

National Pollution Discharge Elimination System

Under the National Pollution Discharge Elimination System (NPDES) program (under Section 402 of the CWA), all facilities that discharge pollutants from any point source into waters of the U.S. must have a NPDES permit. The term “pollutant” broadly applies to any type of industrial, municipal, and agricultural waste discharged into water. Point sources can be publicly owned treatment works, industrial facilities, and urban runoff. The NPDES program addresses certain agricultural activities, but the majority are considered nonpoint sources and are exempt from NPDES regulation. Direct sources discharge directly to receiving waters, and indirect sources discharge to publicly owned treatment works, which in turn discharge to receiving waters. Under the national program, NPDES permits are issued only for direct, point-source discharges. The NPDES has a variety of measures designed to minimize and reduce pollutant discharges. All counties with storm drain systems that serve a population of 50,000 or more, as well as construction sites one acre or more in size, must file for and obtain an NPDES permit.

Federal Emergency Management Agency

The Federal Emergency Management Agency (FEMA) administers the National Flood Insurance Program to provide subsidized flood insurance to communities that comply with FEMA regulations limiting development in floodplains. FEMA also issues Flood Insurance Rate Maps (FIRMs) that identify which land areas are subject to flooding. These maps provide flood information and identify flood hazard zones in the community. The design standard for flood protection is established by FEMA. FEMA’s minimum level of flood protection for new

² Impaired water bodies are water bodies that do not meet or are not expected to meet water quality standards.

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development is the 100-year flood event, also described as a flood that has a 1-in-100 chance of occurring in any given year.

As required by the FEMA regulations, all development in the Special Flood Hazard Zone (as delineated on the FIRM) must be elevated so that the lowest floor is at or above the base flood elevation level. The term “development” is defined by FEMA as any human-made change to improved or unimproved real estate, including, but not limited to, buildings, other structures, mining, dredging, filling, grading, paving, excavation or drilling operations, and storage of equipment or materials. Per these regulations, if development in these areas occurs, a hydrologic and hydraulic analysis must be performed prior to the start of development and must demonstrate that the development does not cause any rise in base flood elevation levels, because no rise is permitted within regulatory floodways. Upon completion of any development that changes existing Special Flood Hazard Area boundaries, the National Flood Insurance Program directs all participating communities to submit the appropriate hydrologic and hydraulic data to FEMA for a FIRM revision, as soon as practicable, but not later than six months after such data becomes available.

STATE

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act (Water Code Sections 13000 et seq.) is the basic water quality control law for California. Under this Act, the State Water Resources Control Board (SWRCB) has ultimate control over state water rights and water quality policy. In California, the EPA has delegated authority to issue NPDES permits to the SWRCB. The state is divided into nine regions related to water quality and quantity characteristics. The SWRCB, through its nine Regional Water Quality Control Boards (RWQCBs), carries out the regulation, protection, and administration of water quality in each region. Each regional board is required to adopt a Water Quality Control Plan or Basin Plan that recognizes and reflects the regional differences in existing water quality, the beneficial uses of the region’s ground and surface water, and local water quality conditions and problems. The proposed project site lies within the jurisdiction of the Central Valley RWQCB (Region 5).

State Water Resources Control Board

In California, the SWRCB has broad authority over water quality control issues for the State. The SWRCB is responsible for developing statewide water quality policy and exercises the powers delegated to the State by the federal government under the CWA. It also regulates public drinking water systems, NPDES wastewater discharges, water quality monitoring, water recycling programs, landfill disposal, water rights, and implements drought restrictions.

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General Construction Permit

Construction activities that disturb one or more acres of land that could impact hydrologic resources must comply with the requirements of the newly reissued SWRCB Construction General Permit (Order WQ 2022-0057-DWQ). Under the terms of the permit, applicants must file Permit Registration Documents (PRDs) with the SWRCB before the start of construction. The PRDs include a Notice of Intent, risk assessment, site map, Stormwater Pollution Prevention Plan (SWPPP), annual fee, and a signed certification statement. The PRDs are submitted electronically to the SWRCB via the Stormwater Multiple Application and Report Tracking System (SMARTS) website.

Applicants must also demonstrate conformance with applicable BMPs and prepare a SWPPP containing a site map that shows the construction site perimeter, existing and proposed buildings, lots, roadways, stormwater collection and discharge points, general topography both before and after construction, and drainage patterns across the project site. The SWPPP must list BMPs that would be implemented to prevent soil erosion and discharge of other construction-related pollutants that could contaminate nearby water resources. Additionally, the SWPPP must contain a visual monitoring program, a sampling program to ensure compliance with water quality standards, and on-site collection of samples and inspection of BMPs during a qualifying precipitation event.

Trash Amendments

On April 7, 2015, the SWRCB adopted an amendment to the Water Quality Control Plan for Ocean Waters of California to control trash and Part 1, *Trash Provisions*, of the Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California (SWRCB 2026). They are collectively referred to as “the Trash Amendments.” The Trash Amendments apply to all surface waters of California and include a land use-based compliance approach to focus trash controls on areas with high trash-generation rates. Areas such as high-density residential, industrial, commercial, mixed urban, and public transportation stations are considered priority land uses. There are two compliance tracks for Phase I and Phase II MS4 permittees:

- **Track 1:** Permittees must install, operate, and maintain a network of certified full-capture systems in storm drains that capture runoff from priority land uses.
- **Track 2:** Permittees must implement a plan with a combination of full capture systems, multi-benefit projects, institutional controls, and/or other treatment methods that have the same effectiveness as Track 1 methods.

The Trash Amendments provide a framework for permittees to implement their provisions. Full compliance must occur within 10 years of the permit, and permittees must also meet interim milestones such as average load reductions of 10 percent per year. The amendment mandates

3.9 HYDROLOGY AND WATER QUALITY

that jurisdictions covered under the Central Valley Phase II MS4 need to install catch basin filters on all catch basins by December 2, 2030.

Waste Discharge Requirements

All dischargers of waste to waters of the state are subject to regulation under the Porter-Cologne Act and the requirement for waste discharge requirements (WDR) is incorporated into the California Water Code. This includes both point- and nonpoint-source dischargers. All current and proposed nonpoint-source discharges to land must be regulated under WDRs, waivers of WDRs, a basin plan prohibition, or some combination of these administrative tools. Discharges of waste directly to State waters would be subject to an individual or general NPDES permit, which also serves as WDRs. The proposed project is subject to the Municipal Stormwater NPDES Permit and the Construction General Permit, both of which also serve as WDRs.

The RWQCBs have primary responsibility for issuing WDRs. The RWQCBs may issue individual WDRs to cover individual discharges or general WDRs to cover a category of discharges. WDRs may include effluent limitations or other requirements that are designed to implement applicable water quality control plans, including designated beneficial uses and the water quality objectives established to protect those uses and prevent the creation of nuisance conditions. Violations of WDRs may be addressed by issuing Cleanup and Abatement Orders or Cease and Desist Orders, assessing administrative civil liability, or seeking imposition of judicial civil liability or judicial injunctive relief.

Water Conservation in Landscaping Act of 2006

The Water Conservation in Landscaping Act includes the State of California's Model Water Efficient Landscape Ordinance (MWELO), which requires cities and counties to adopt landscape water conservation ordinances. The MWELO was revised in July 2015 via Executive Order B-29-15 to address the ongoing drought and build resiliency for future droughts. State law requires all land use agencies, which include cities and counties, to adopt a Water Efficient Landscape Ordinance that is at least as efficient as the MWELO prepared by the Department of Water Resources (DWR). The 2015 revisions to the MWELO improve water conservation in the landscaping sector by promoting efficient landscapes in new developments and retrofitted landscapes. The revisions increase water efficiency by requiring more efficient irrigation systems, incentives for grey water usage, improvements in on-site stormwater capture, and limiting the portion of landscapes that can be covered in high-water-use plants and turf. New development projects that include landscape areas of 500 square feet or more are subject to the MWELO. This applies to residential, commercial, industrial, and institutional projects that require a permit, plan check, or design review. The size threshold for rehabilitated landscapes has not changed and remains at 2,500 square feet.

3.9 HYDROLOGY AND WATER QUALITY

Sustainable Groundwater Management Act

The historic passage of the Sustainable Groundwater Management Act (SGMA) in 2014 set forth a statewide framework to help protect groundwater resources over the long term. SGMA is made up of a three-bill legislative package, including Assembly Bill (AB) 1739, Senate Bill (SB) 1168, and SB 1319, and subsequent statewide regulations. The Governor’s signing message states that “groundwater management in California is best accomplished locally.” Under SGMA, in groundwater basins that are designated as medium and high priority, local public agencies and groundwater sustainability agencies (GSAs) must assess conditions in their local groundwater basins and then prepare groundwater sustainability plans (GSPs) or alternatives to GSPs to avoid undesirable results and mitigate overdraft within 20 years. DWR serves two roles to support local SGMA implementation (1) regulatory oversight through the evaluation and assessment of GSPs and (2) providing ongoing assistance to locals through the development of: best management practices and guidance, planning assistance, technical assistance, and financial assistance.

Regional Water Management Planning Act

In 2000, the Legislature passed the Integrated Regional Water Management Planning Act, which allows a regional water management group to prepare and adopt an Integrated Regional Water Management Plan (IRWMP) that includes qualified programs or projects or qualified reports or studies identified in Water Code Section 10540 et seq. Many of the water management elements identified in the act are also part of an Urban Water Management Plan. The intent of the Legislature is to encourage local agencies to work cooperatively to manage their available local and imported water supplies to improve the quality, quantity, and reliability of those supplies. The Town of Paradise is in the Northern Sacramento Valley IRWMP (NSV 2014).

REGIONAL

Butte County Groundwater Management Plan

The Groundwater Management Plan supports the long-term maintenance of high-quality groundwater resources in Butte County for agricultural, environmental, rural domestic, and urban needs. Specifically, the Butte County Groundwater Management Plan endeavors to:

- Minimize the long-term drawdown of groundwater levels.
- Protect groundwater quality.
- Prevent inelastic land surface subsidence from occurring because of groundwater pumping.
- Minimize changes to surface water flows and quality that directly affect groundwater levels or quality.
- Minimize the effect of groundwater pumping on surface water flows and quality.
- Evaluate groundwater replenishment and cooperative management projects.

LOCAL

Paradise Stormwater Management Program

Mandated by Congress under the Clean Water Act in 1990, the NPDES Stormwater Management Program is a comprehensive national program for addressing non-agricultural sources of stormwater pollution that adversely affect the quality of our nation's waters. The program uses the National Pollutant Discharge Elimination System (NPDES) to require cities to implement controls designed to prevent harmful pollutants from being washed by runoff into local water bodies. The Town of Paradise, under the NPDES Small MS4 Phase II permit, is actively pursuing these controls.

Paradise Storm Drainage Master Plan

The purpose of this Storm Drainage Master Plan (SDMP) was to establish a prioritized project improvement list aimed at reducing the risk of flooding in the Town of Paradise. This SDMP provides the Town with a framework to evaluate storm drainage related recovery efforts from the Camp Fire that destroyed most of Paradise in November 2018. This SDMP evaluates and redefines the limits of expected storm drainage through the town.

Paradise Post-Construction Standards Plan

The Post-Construction Standards Plan provides project proponents and municipal plan checkers with information on how to meet the State Water Board's requirements for mitigating the negative impact of increases in stormwater runoff caused by new development and redevelopment. This document accomplishes this goal through the incorporation of Low-Impact Development (LID) standards and hydromodification management techniques. LID measures mitigate excessive runoff by the use of control measures that use evapotranspiration, infiltration, capture/reuse, and biotreatment to mimic the runoff of a natural environment. Hydromodification techniques are used to design development sites so that post-construction runoff flow rates do not exceed those of preconstruction conditions.

Paradise Irrigation District Urban Water Management Plan

The purpose of Paradise Irrigation District's (PID's) 2020 Urban Water Management Plan (UWMP) is to inform the public and state agencies of PID's water supply availability, exposure to droughts, conservation efforts, and plans for future supply. UWMPs are prepared by California's urban water suppliers to support their long-term resource planning and ensure adequate water supplies are available to meet existing and future water demands.

Town of Paradise 1994 General Plan

The Paradise General Plan serves as the legal and policy foundation for all land use decisions within the Town of Paradise. It is a comprehensive expression of community values and long-

3.9 HYDROLOGY AND WATER QUALITY

term development goals, containing policy statements related to the distribution of future land uses across multiple elements, including land use, circulation, housing, noise, safety, open space/conservation/energy, and education and social services. Each element identifies issues, goals, objectives, policies, and specific implementation measures. The set of goals and policies listed is not an exhaustive list of all of the General Plan policies applicable to the proposed project; rather, it is a selection relevant to the impact discussion in this chapter.

Land Use Element

LUG-7. Fully implement the onsite wastewater management district.

- **LUO-5:** Assure that an adequate water supply exists prior to approval of development in the Paradise planning area.
- **LUP-71.** The town shall work proactively with the Paradise Irrigation District, Butte County and interested community groups to assure protection of the Paradise watershed, the enhancement of the quality of domestic water and the improvement of the town water supply distribution system.

Safety Element

- **SP-9.** The town should assure that increased runoff resulting from additional coverage of surface area on developing properties does not adversely affect surrounding properties, roads, or stream courses.
- **SP-10.** The Town shall attempt to assure that no new structures are located within potential floodways.
- **SP-11.** Development should not be permitted if identified or potential flooding and drainage impacts cannot be overcome by sound engineering practices.
- **SP-14.** Detrimental and toxic discharge into natural waterways shall not be permitted.

Open Space/Conservation/Energy Element

OCEG-7. Actively promote water conservation and recycling efforts.

- **OCEO-7:** Maintain or improve the current level of water quality through the next fifteen years.
- **OCEP-23.** Surface and groundwater quality shall be improved and preserved, and the Paradise area watershed shall be protected.

3.9 HYDROLOGY AND WATER QUALITY

- **OCEP-25.** The town shall strive to influence activities within its watershed and outside the town limits in order to protect and preserve the town's water resources.
- **OCEI-26.** Support the water conservation standards and programs of the Paradise Irrigation District, the Del Oro Water Company and the Lime Saddle Community Services District.

Town of Paradise Code of Ordinances

The Paradise Code of Ordinances outlines the local laws and regulations governing land use, development, and environmental protection within the town. Among its provisions, the municipal code includes specific measures to preserve water resources.

- **Section 8.56.050:** Assigns responsibility for administering the town's stormwater quality and runoff control program.
- **Section 8.56.060:** Requires compliance with the Clean Water Act, the Porter-Cologne Act, and any related amendments or implementing regulations.
- **Section 8.56.070:** Prohibits discharges to the storm drain system that are not composed entirely of stormwater, helping prevent water quality impacts.
- **Section 8.56.080:** Bans connections that could convey pollutants to the storm drain system.
- **Section 8.56.090:** Requires that any person subject to an industrial or construction activity NPDES stormwater discharge permit shall comply with all provisions of such permit.
- **Section 8.56.100:** Obligates property owners and developers to implement best management practices (BMPs) to control stormwater pollutants.
- **Chapter 15:** Requires erosion and sediment control plans for grading permits.
- **Chapter 15.36:** Sets forth design criteria for landscape materials promoting installation of water-efficient, fire-resistant landscaping.

3.9.2 Existing Conditions

HYDROLOGY

Butte County, including the Town of Paradise, is in the Sacramento River Hydrological Region. This region includes the Sacramento River, which is the longest river system in California, and its tributaries, including the Pit, Feather, American, Yuba, and Bear Rivers. The Sacramento River Hydrological Region is the primary water source for many of the urban and agricultural areas of California (Butte County 2021). Surface storage reservoirs provide much of the water supply in

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the region. Paradise has several aquifer zones. Beneath Paradise, groundwater movement is generally in a north-to-south direction (Paradise 1994).

The project site is currently vacant and previously contained the First Assembly of God Church with associated parking lot and multiple residential structures that burned down during the 2018 Camp Fire. The project site and surrounding area are nearly flat, with a slight slope from east to west. The hardscape parking lot remains on the project site and is on the eastern portion of the project site. Currently, runoff on the project site is absorbed by pervious surfaces or collected via storm drain inlets and conveyed to the Town's existing storm drains.

SURFACE WATER AND SURFACE WATER QUALITY

The Paradise area is on a gently sloping ridge where runoff generally flows over the ground surface before collecting in small channels or shallow depressions. There is localized erosion and siltation in these depressions or swales due to slope and the topography. However, the bulk of the runoff flows downslope to become runoff in lower stream systems. The Paradise area is divided into distinct drainage basins. The drainage basins serve to collect upslope surface runoff and direct it downslope. Some drainage features are supported by groundwater seeps and springs, which provide additional moisture beyond rainfall. In most areas, stormwater reaches main drainage channels as overland flow. Formal storm drain systems are limited, and roadside ditches are the primary means of collecting and conveying runoff. It has been reported that there has been contamination of small streams in Paradise associated with surfacing septic tank effluent (Paradise 1994). There are no impaired water bodies in the Town of Paradise (Paradise 2016).

GROUNDWATER AND GROUNDWATER QUALITY

Groundwater resources in Paradise are mostly found in cracks within hard volcanic and metamorphic rock rather than in a large, continuous underground water basin. Paradise is in the foothills of the Sierra Nevada, where groundwater is typically present in localized, low-yield aquifers with limited storage capacity (USGS 2014). As a result, groundwater in the Paradise area is generally used for individual domestic and small-capacity wells, rather than as a primary municipal water supply.

The shallowest groundwater body in the area consists of perched water lying atop the Tuscan Formation. It is influenced by seasonal precipitation and local recharge from wastewater disposal systems and does not produce dependable yields of usable quantity. The underlying Tuscan Formation, however, does have weathered and permeable zones that yield moderate quantities of groundwater. Based on a review of well logs for the Paradise area, the Tuscan Formation typically yields usable water at depths of less than 200 feet. The upper portions of the Tuscan Formation may hold unconfined water that receives recharge from the Paradise area and could be subject to contamination by septic systems. Septic tank/leach line failures in

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Paradise do not affect water supplies distributed by PID since its sources are outside the urban area (Paradise 1994).

The PID does not rely on groundwater extraction to serve municipal customers and instead provides potable water exclusively from surface water sources; groundwater pumping within Paradise is therefore limited and dispersed. There is no groundwater basin subject to adjudication, active recharge management, or basin production controls in the Paradise area. The Paradise area is not included in a medium- or high-priority groundwater basin under the Sustainable Groundwater Management Act, reflecting the absence of significant groundwater storage or overdraft concerns (DWR 2026).

Groundwater quality in fractured rock settings, such as Paradise, can vary depending on local geology, depth, and well construction. Naturally occurring materials, such as iron, manganese, and total dissolved solids may be present at elevated levels in some wells, and groundwater yields may fluctuate seasonally in response to precipitation patterns (Paradise 2016). Because of these limitations, groundwater in the Paradise area is not managed as a regional replenishment resource and is not supplemented by artificial recharge, recycled water injection, or desalination facilities.

FLOOD HAZARDS

The National Flood Insurance Act (1968) established the National Flood Insurance Program, which is based on the minimal requirements for floodplain management and is designed to minimize flood damage within Special Flood Hazard Areas. FEMA is the agency that administrates the National Flood Insurance Program. The project site is within FEMA Flood Zone X, areas with minimal flood hazard (FEMA 2026). Additionally, the project site is approximately 120 miles from the Pacific Ocean and is therefore not within a tsunami hazard area.

There are no large water tanks on the project site, but the Magalia Reservoir is approximately 4.35 miles northeast of the project site (NID 2026). According to the Paradise General Plan, there are 24 dams in Butte County, and two are above the town. However, as there are no known geologic hazards in the vicinity and the dams are inspected annually, the General Plan concludes that dam inundation hazard is low (Paradise 1994).

WATER SUPPLY

Water is provided to the Town of Paradise, including Paradise High School, by the PID. PID obtains its water from two reservoirs on Little Butte Creek, the Magalia Reservoir and Paradise Reservoir. Together, the reservoir system has a maximum storage capacity of 12,293-acre feet (PID 2026). Water is transported to the town through a single transmission line. Distribution lines, booster pumps, and surface-level tank reservoirs serve various pressure zones throughout the town. The calculated per capita water usage has varied since 1980 from 245 to 289 gallons

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per day. There are also approximately 300 privately owned wells in Paradise which supply water for irrigation and domestic uses (Paradise 1994). Paradise High School is served through existing municipal infrastructure and does not rely on on-site groundwater wells or independent water supply systems. The PID projects that the total demand for potable and non-potable water for the service area would be 4,356 acre-feet in 2030 (PID 2023).

3.9.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, *Environmental Checklist Form*, of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact related to hydrology if it would:

- a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.
- b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.
- c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
 - i) Result in a substantial erosion or siltation on- or off-site.
 - ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.
 - iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.
 - iv) Impede or redirect flood flows.
- d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.
- e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

METHODOLOGY

To evaluate the potential impacts of the proposed project on hydrology and water quality, relevant information was reviewed from the Paradise General Plan and data from the PID. These sources were analyzed to determine whether implementation of the proposed project would affect surface and groundwater quality.

3.9.4 Project Impact Analysis

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

A significant impact would occur if the proposed project discharges water that does not meet the quality standards of agencies that regulate surface water quality and discharges into the stormwater drainage system. During construction, water quality impacts could occur from discharge of soil through erosion, sediments, and other pollutants. The SWRCB's NPDES program regulates industrial pollutant discharges, including construction activities for sites larger than one acre. The project site would include approximately seven acres of ground disturbance.

New construction projects can result in two types of water quality impacts: (1) short-term impacts from discharge of soil through erosion, sediments, and other pollutants during construction and (2) long-term impacts from impervious surfaces (buildings, roads, parking lots, and walkways) that prevent water from being absorbed into the ground, thereby increasing the pollutants in stormwater runoff. Impervious surfaces can increase the concentration of pollutants in stormwater runoff, such as oil, fertilizers, pesticides, trash, soil, and animal waste. Runoff from short-term construction and long-term operation can flow directly into lakes, local streams, channels, and storm drains and eventually be released untreated into the ocean.

CONSTRUCTION

The project would be constructed on a vacant parcel that was previously developed. The project site is surrounded by single-family residences, Paradise High School, and adjacent paved streets that currently generate nonpoint-source pollutants that are carried by stormwater into storm drains. Clearing, grading, excavation, and construction activities associated with the proposed project may impact water quality through soil erosion and increasing the amount of silt and debris carried in runoff. Additionally, the use of construction materials, such as fuels, solvents, and paints may present a risk to surface water quality. Finally, the refueling and parking of construction vehicles and other equipment on-site during construction may result in oil, grease, or related pollutant leaks and spills that may discharge into the storm drain system.

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To minimize these potential impacts, the proposed project would be required to comply with the NPDES Construction General Permit (CGP) as well as prepare a SWPPP that requires the incorporation of BMPs to control sedimentation, erosion, and hazardous materials contamination of runoff during construction. The CGP requires that prior to the start of construction activities, the District must file permit registration documents (PRD) with the SWRCB, which includes a Notice of Intent, risk assessment, site map, annual fee, signed certification statement, SWPPP, and post-construction water balance calculations. The construction contractor is required to maintain a copy of the SWPPP on-site at all times and implement all construction BMPs identified in the SWPPP during construction activities. Prior to the commencement of grading activities, the District is required to provide proof of filing of the PRDs with the SWRCB, which includes preparation of a SWPPP.

The SWPPP must describe construction BMPs that address pollutant source reduction and provide measures/controls to mitigate potential pollutant sources which include, but are not limited to:

- Erosion controls (e.g., earth dikes and swales, mulching, slope drains, compost blankets)
- Sediment controls (e.g., silt fence, sediment trap, sandbag, or straw bale barriers)
- Tracking controls (e.g., stabilized construction entrance/exit, tire wash)
- Non-stormwater management (e.g., dewatering practices, vehicle and equipment cleaning)
- Materials and waste management (e.g., material storage, hazardous waste management, soil management)
- Good housekeeping practice.

Submittal of the PRDs and implementation of the SWPPP and its associated BMPs throughout the construction phase would result in a **less-than-significant** impact.

OPERATION

Once the proposed project has been constructed, urban runoff could include a variety of contaminants that are typical of the operation of agricultural and school athletic facilities (see Section 3.8, *Hazards and Hazardous Materials*). As discussed in that section, the proposed project would be required to comply with applicable federal and State laws and regulations governing the use, storage, transport, and disposal of hazardous materials would ensure impacts would be less than significant. The proposed project would implement operational BMPs to control the amount and quality of the stormwater leaving the project site.

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Furthermore, the District would adhere to the requirements of the Town of Paradise Code of Ordinances Chapter 8.56, which regulates illicit discharge prevention by prohibiting non-stormwater discharges, requiring implementation of source-control measures, and mandating that site operators minimize pollutants in runoff to the maximum extent practicable. Compliance with these requirements would reduce the potential for pollutants to enter the municipal storm drain system and downstream receiving waters. Compliance with federal, State, County, and local regulations and code requirements, would ensure the proposed project would have a less-than-significant impact on surface or groundwater quality during the operational phase. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant.

b) Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

The PID supplies water to the town, including the project site. The town's primary source of water is the Magalia Reservoir and from a local well (SDWIS 2026). The project site does not contain any wells or direct groundwater connections, and the proposed project would not increase student enrollment. The proposed project may result in an increase in water demand during operation of the proposed agricultural building. However, the amount of water required for animal care and maintenance of the agricultural facilities would be relatively small compared to overall campus water demand and would be supplied through the existing PID water system. Additionally, the proposed project's landscaping would be reviewed by DSA for compliance with landscape design standards for water-efficiency.

Additionally, the use of the project site for athletic practices and games would relocate these events that are currently occurring on the Paradise High School campus; events that are currently held on the existing football stadium would be moved to the proposed new stadium. Thus, the proposed project's water demand caused by events would be similar compared to existing conditions because the events at the project site are existing events that already occur on campus, and potential increased water demand would only occur during events/games, which are intermittent. However, the grass of the proposed new stadium would require additional water to be maintained. This would likely require a similar amount of water as currently used for the existing football stadium. This would increase the overall water demand of Paradise HS, but not to a level that would require new groundwater extraction, since the PID will have adequate water supplies to meet water demands in its service area through 2040 during normal, dry, and multiple dry years (PID 2023). Thus, the increase in water use would not require new groundwater extraction or expansion of water supply infrastructure.

Stormwater runoff will continue to drain into existing stormwater capture facilities, and the proposed project would include infrastructure to direct stormwater flows to existing stormwater

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capture facilities, with no adverse effect on groundwater recharge. The proposed project would not interfere with groundwater recharge. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant.

-
- c) **Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would:**
- i) **Result in a substantial erosion or siltation on- or off-site?**
 - ii) **Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?**
 - iii) **Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?**
 - iv) **Impede or redirect flood flows?**
-

Construction activities (grading, excavation) may disturb soils, especially in areas without prior development. If not properly managed, this could lead to erosion and sediment being carried off-site during rainfall events. The proposed project would be required to prepare a SWPPP, which would be prepared with BMPs to control potential erosion and be compliant with NPDES requirements.

The addition of impervious surfaces (e.g., driveways, sidewalks) may increase stormwater runoff. Without proper stormwater detention or infiltration systems, this could increase peak flows and cause localized flooding. New urban runoff may contain pollutants such as oil, pesticides, fertilizers, or trash. If the stormwater infrastructure is undersized or lacks BMPs, this could overwhelm systems or cause water quality degradation.

EROSION

Erosion is a normal and inevitable geologic process whereby earthen materials are loosened, worn away, decomposed or dissolved, and moved from one place to another. Precipitation, running water, waves, and wind are all agents of erosion. Ordinarily, erosion proceeds imperceptibly, but when the natural equilibrium of the environment is changed, the rate of erosion can greatly accelerate. This can create aesthetic as well as engineering problems on undeveloped sites. Accelerated erosion in an urban area can cause damage by undermining structures; blocking storm drains; and depositing silt, sand, or mud on roads and in tunnels. Eroded materials can eventually be deposited in local waters, where the carried silt remains

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suspended in the water for some time, constituting a pollutant and altering the normal balance of plant and animal life.

During construction, the proposed project's earthwork activities may include grading. If not controlled, the transport of these materials to local waterways would temporarily increase suspended sediment concentrations and release pollutants attached to sediment particles into local waterways. The proposed project would be required to submit PRDs and a SWPPP to the SWRCB for approval prior to the commencement of construction activities, as described under impact discussion (a). The SWPPP would describe BMPs to reduce erosion and siltation during construction of the proposed project. Impacts related to substantial erosion or siltation during construction would be less than significant.

There are no streams or rivers on the project site. Additionally, the proposed project would not be expected to involve the alteration of the existing on-site drainage patterns; however, any alterations that would occur would be designed to meet local, state, and federal water quality standards and to ensure that stormwater flows do not result in substantial erosion or siltation. The proposed project would also not significantly increase the amount of impervious surfaces present at the project site. Additionally, the project site is nearly flat, thus reducing the potential for erosion. Adherence to the applicable BMPs including site design measures, source control measures, LID, and treatment measures that address stormwater runoff, as described under impact discussion (a), would also reduce the potential for erosion and siltation. Therefore, impacts related to erosion and siltation would be **less than significant**.

SURFACE RUNOFF

The project site is currently vacant but was previously developed with the First Assembly of God Church with associated parking lot and multiple residential structures that burned down during the 2018 Camp Fire. The proposed project would not involve the alteration of any natural drainage or watercourse. The proposed project would result in an increase of impervious surfaces on the project site from the proposed new parking lot, concrete hardscape from the agricultural building, and the bleachers, concession stand, and restrooms for the new stadium. However, the increase in impervious area would be managed through the incorporation of stormwater control measures and the proposed project also includes the addition of new landscaping that would add pervious surfaces to the project site. In addition, the location of the project site within an already developed and served area would limit the potential for substantial increases in peak flow rates. Runoff generated from impervious surfaces would be directed to appropriate collection systems that are designed to accommodate such flows, thereby minimizing the potential for excessive surface runoff. The proposed project would not substantially increase the rate or amount of surface runoff in a manner that would cause flooding on- or off-site. Therefore, impacts related to stormwater drainage and flooding would be **less than significant**.

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STORMWATER DRAINAGE SYSTEMS

Stormwater on the project site that does not percolate into the ground would be directed to the existing storm drainage systems in the public right-of-way on Elliott Road. As discussed in Impact 3.9(a), construction and operation of the proposed project would be required to implement BMPs that would control the amount and quality of stormwater exiting the project site and would adhere to the requirements of the Town of Paradise Code of Ordinances Chapter 8.56, which regulates illicit discharge prevention by prohibiting non-stormwater discharges, requiring implementation of source-control measures, and mandating that site operators minimize pollutants in runoff to the maximum extent practicable. The proposed project would not exceed the capacity of existing stormwater drainage systems and would not create substantial additional sources of polluted runoff. Impacts would be **less than significant**.

FLOOD FLOWS

According to the FEMA flood zone map, the project site is not within a flood zone and is within a developed area of the Town of Paradise (FEMA 2026). Therefore, the project would not result in impeding or redirecting flood flows, and impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

d) In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

A seiche is a surface wave created when a body of water is shaken, usually by earthquake activity. Seiches are of concern relative to water storage facilities because inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam, or other artificial body of water. There are no large water tanks in the area, but the Magalia Reservoir is approximately 4.35 miles northeast of the project site (NID 2026). As stated in Section 3.9.2, *Existing Conditions*, there are 24 dams in Butte County, and 2 are located above the town. However, as there are no known geologic hazards in the vicinity and the dams are inspected annually, the General Plan concludes that dam inundation hazard is low (Paradise 1994). Additionally, the project site is not within a flood zone (FEMA 2026). Therefore, flood hazards are low. Additionally, the project site is approximately 120 miles from the Pacific Ocean and is not within a tsunami zone. The project site is outside of flood hazard, tsunami, or seiche zones. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant.

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e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

As previously discussed in Section 3.9(b), the proposed project would not substantially affect groundwater resources and therefore would not obstruct implementation of a sustainable groundwater management plan. The proposed project would not involve groundwater extraction, recharge activities, or alterations to subsurface hydrology that could interfere with basin management objectives or adopted sustainability criteria. The proposed project would not require new or expanded water or wastewater treatment facilities beyond those already planned, nor would it substantially alter drainage patterns or increase runoff in a manner that would result in water quality degradation. Project construction and operation would comply with applicable local, regional, and state stormwater regulations, including implementation of best management practices and post-construction stormwater controls. Animal husbandry areas would incorporate appropriate waste management and runoff controls to prevent discharge of pollutants. Therefore, the project would not obstruct implementation of a water quality control plan, and impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

3.9.5 Cumulative Impact Analysis

Would the project have a cumulative effect related to hydrology or water quality?

As defined in Section 15130 of the State CEQA Guidelines, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects within the cumulative impact area for utilities and services. There are currently no other major improvement projects in the vicinity that would result in a contribution to cumulatively significant effects.

The proposed project and all cumulative projects would be required to comply with applicable federal and State laws and regulations governing the use, storage, transport, and disposal of hazardous materials that would ensure impacts to water quality would be less than significant. Each project would implement operational BMPs to control the amount and quality of the stormwater leaving the project site. Compliance with federal, State, County, and local regulations and code requirements would result in a less-than-significant cumulative impact on water quality.

The proposed project would not change current enrollment or staffing. The increases in water consumption from the proposed project would be to maintain the proposed new field and would not result in a need to increase pumping of groundwater resources. Therefore, the

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proposed project's contribution to cumulative groundwater impacts would not be cumulatively considerable.

The proposed project would not involve the alteration of any natural drainage channels or any watercourse. The proposed project is not anticipated to substantially alter the existing on-site drainage patterns; however, any alterations that would occur would be designed to meet federal, State, County, and local water quality standards and to ensure that stormwater flows do not result in substantial erosion or siltation. The proposed project would not substantially increase the rate or amount of surface runoff in a manner that would result in on- or off-site flooding. The increase in impervious area would be managed through the incorporation of stormwater control measures. The proposed project also includes the addition of new landscaping and the proposed new stadium that would provide pervious surfaces at the project site. The proposed project would not exceed the capacity of existing stormwater drainage systems and would not create substantial additional sources of polluted runoff. Therefore, the proposed project's contribution to cumulative drainage impacts would not be cumulatively considerable.

As described in Section 3.9.4(d), the project site and surrounding area are outside of flood hazard, tsunamis, or seiche zones. The proposed project and cumulative projects would not contain hazardous materials that could be released during flood events, including a seiche.

The proposed project would not affect groundwater and therefore would not obstruct implementation of a sustainable groundwater management plan. The proposed project would not involve groundwater extraction, recharge activities, or alterations to subsurface hydrology that could interfere with basin management objectives or adopted sustainability criteria. The proposed project would not affect groundwater and would not obstruct implementation of a sustainable groundwater management plan. Overall, the proposed project would not have a cumulative effect related to hydrology, and this impact is **less than significant**.

Significance without Mitigation: Less than significant.

3.9.6 References

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3.10 NOISE

This section of the Draft Environmental Impact Report (DEIR) evaluates the potential for implementation of the Paradise High School Expansion Project (proposed project) to result in noise impacts in the local vicinity. Specifically, this section summarizes relevant federal, State, and local noise guidelines, policies, and standards; reviews noise levels at existing receptor locations; and provides an analysis of the potential noise impacts and mitigation measures that would minimize potentially significant impacts. This evaluation uses procedures and methodologies specified by the Federal Transit Administration (FTA). The analysis is also based in part on the following technical report.

- *Noise and Vibration Modeling*, PlaceWorks, March 2026

A complete copy of this technical report is provided in Appendix F of this DEIR.

During the Notice of Preparation (NOP) public review period, one comment was received regarding noise impacts. The NOP is included as Appendix A of this DEIR.

Terminology

The following defines terminology commonly referred to in this analysis:

- **Sound.** A disturbance created by a vibrating object, which, when transmitted by pressure waves through a medium such as air, is capable of being detected by a receiving mechanism, such as the human ear or a microphone.
- **Noise.** Sound that is loud, unpleasant, unexpected, or otherwise undesirable.
- **Decibel (dB).** A unitless measure of sound on a logarithmic scale.
- **A-Weighted Decibel (dBA).** An overall frequency-weighted sound level in decibels that approximates the frequency response of the human ear.
- **Lmax.** The instantaneous maximum noise level for a specified period.
- **Equivalent Continuous Noise Level (Leq); also called the Energy-Equivalent Noise Level.** The value of an equivalent, steady sound level that, in a stated time period (often over an hour) and at a stated location, has the same A-weighted sound energy as the time-varying sound. Thus, the Leq metric is a single numerical value that represents the equivalent amount of variable sound energy received by a receptor over the specified duration.
- **Statistical Sound Level (Ln).** The sound level that is exceeded “n” percent of time during a given sample period. For example, the L50 level is the statistical indicator of the time-varying noise signal that is exceeded 50 percent of the time (during each sampling period); that is, half of the sampling time, the changing noise levels are above this value and half of the time they are below it. This is called the “median sound level.” The L10 level, likewise, is

3.10 NOISE

the value that is exceeded 10 percent of the time (i.e., near the maximum) and this is often known as the “intrusive sound level.” The L90 is the sound level exceeded 90 percent of the time and is often considered the “effective background level” or “residual noise level.”

- **Day-Night Sound Level (Ldn or DNL).** The energy-average of the A-weighted sound levels occurring during a 24-hour period, with 10 dB added to the sound levels occurring during the period from 10:00 pm to 7:00 am.
- **Community Noise Equivalent Level (CNEL).** The energy average of the A-weighted sound levels occurring during a 24-hour period, with 5 dB added from 7:00 pm to 10:00 pm and 10 dB from 10:00 pm to 7:00 am. For general community/environmental noise, CNEL and Ldn values rarely differ by more than 1 dB (with the CNEL being only slightly more restrictive, that is, higher than the Ldn value). As a matter of practice, Ldn and CNEL values are interchangeable and are treated as equivalent in this assessment.
- **Peak Particle Velocity (PPV).** The peak signal value of an oscillating vibration velocity waveform usually expressed in inches per second (in/sec).
- **Sensitive Receptor.** Sensitive receptors include land uses where quiet environments are necessary for enjoyment and public health and safety. Residences, schools, motels and hotels, libraries, religious institutions, hospitals, and nursing homes are examples.

Noise and Vibration Fundamentals

Noise is defined as unwanted sound and is known to have several adverse effects on people, including hearing loss, speech and sleep interference, physiological responses, and annoyance. Although sound can be easily measured, the perception of noise and the physical response to sound complicate the analysis of its impact on people. People judge the relative magnitude of sound sensation in subjective terms such as “noisiness” or “loudness.” Based on these known adverse effects of noise, the federal government, the State of California, and many local governments have established criteria to protect public health and safety and to prevent disruption of certain human activities.

NOISE FUNDAMENTALS

Sound is a pressure wave transmitted through the air. It is described in terms of loudness or amplitude (measured in decibels), frequency or pitch (measured in Hertz [Hz] or cycles per second), and duration (measured in seconds or minutes). The standard unit of measurement of the loudness of sound is the decibel (dB). Changes of 1 to 3 dBA are detectable under quiet, controlled conditions, and changes of less than 1 dBA are usually indiscernible. A 3 dBA change in noise levels is considered the minimum change that is detectable with human hearing in outside environments. A change of 5 dBA is readily discernable to most people in an exterior environment, and a 10 dBA change is perceived as a doubling (or halving) of the sound.

The human ear is not equally sensitive to all frequencies. Sound waves below 16 Hz are not heard at all and are “felt” more as a vibration. Similarly, while people with extremely sensitive hearing can hear sounds as high as 20,000 Hz, most people cannot hear above 15,000 Hz. In all cases, hearing acuity falls off rapidly above about 10,000 Hz and below about 200 Hz. Since the human ear is not equally sensitive to sound at all frequencies, a special frequency-dependent rating scale is usually used to relate noise to human sensitivity. The A-weighted decibel scale (dBA) performs this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear.

Noise Measurement

Sound intensity is measured through the A-weighted scale to correct for the relative frequency response of the human ear. That is, an A-weighted noise level de-emphasizes low and very high frequencies of sound, similar to the human ear’s de-emphasis of these frequencies.

Unlike linear units such as inches or pounds, decibels are measured on a logarithmic scale, representing points on a sharply rising curve. On a logarithmic scale, an increase of 10 dBA is 10 times more intense than 1 dBA, while 20 dBA is 100 times more intense, and 30 dBA is 1,000 times more intense. A sound as soft as human breathing is about 10 times greater than 0 dBA. The decibel system of measuring sound gives a rough connection between the physical intensity of sound and its perceived loudness to the human ear. Ambient sounds generally range from 30 dBA (very quiet) to 100 dBA (very loud).

Sound levels are generated from a source, and their decibel level decreases as the distance from that source increases. Sound dissipates exponentially with distance from the noise source. This phenomenon is known as “spreading loss.” For a single point source, sound levels decrease by approximately 6 dBA for each doubling of distance from the source. This drop-off rate is appropriate for noise generated by on-site operations from stationary equipment or activity at a project site. If noise is produced by a line source, such as highway traffic, the sound decreases by 3 dBA for each doubling of distance in a hard site environment. Line source noise in a flat environment with absorptive vegetation decreases by 4.5 dBA for each doubling of distance.

Time variation in noise exposure is typically expressed in terms of a steady-state energy level equal to the energy content of the time varying period (called Leq), or alternately, as a statistical description of the sound level that is exceeded over some fraction of a given observation period. For example, the L₅₀ noise level represents the noise level that is exceeded 50 percent of the time. Half the time the noise level exceeds this level and half the time the noise level is less than this level. This level is also representative of the level that is exceeded 30 minutes in an hour. Similarly, the L₂, L₈, and L₂₅ values represent the noise levels that are exceeded 2, 8, and 25 percent of the time or 1, 5, and 15 minutes per hour. These “L” values are typically used to demonstrate compliance for stationary noise sources with a city’s noise ordinance, as discussed below. Other values typically noted during a noise survey are the L_{min} and L_{max}. These values

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represent the minimum and maximum root-mean-square noise levels obtained over the measurement period.

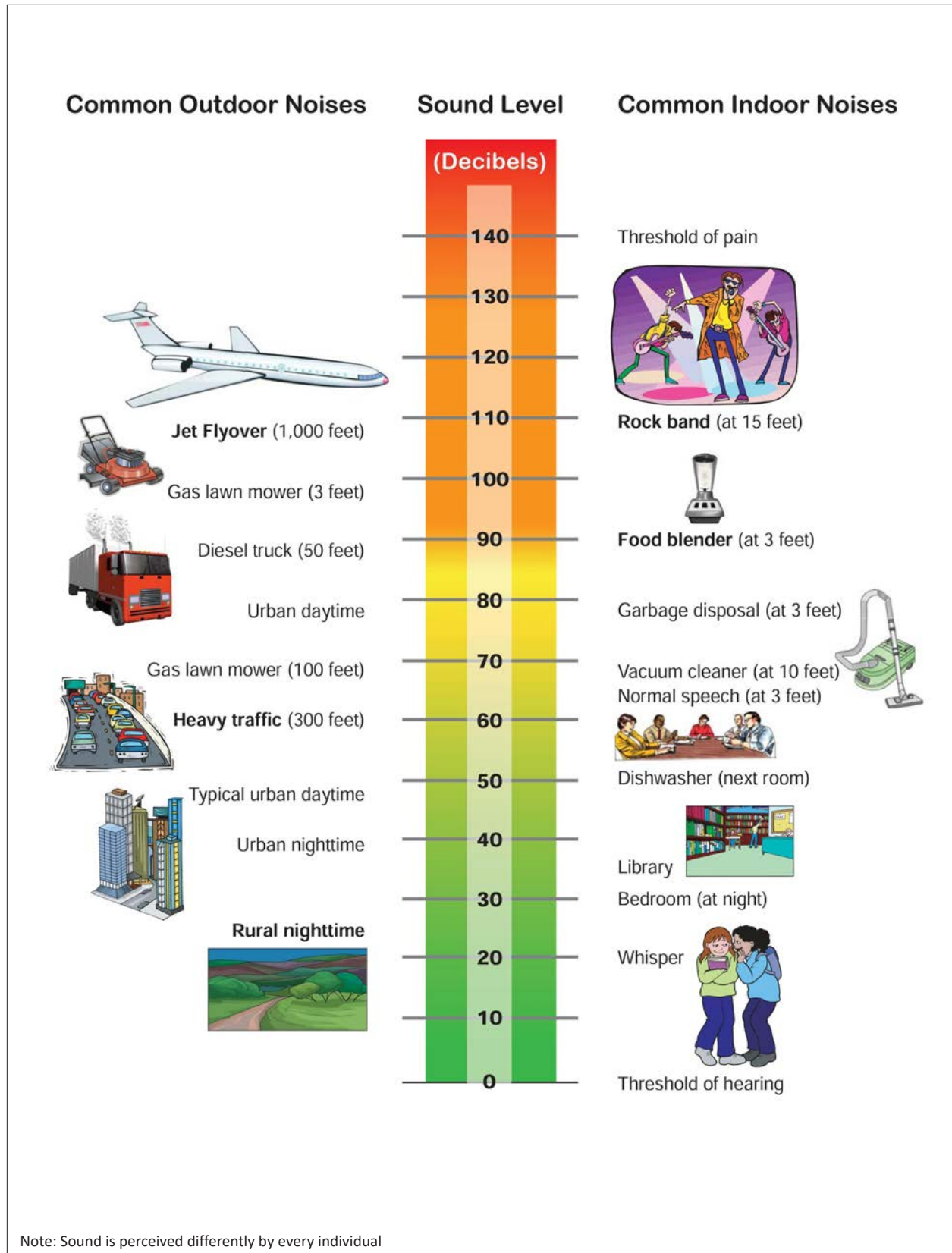
Because community receptors are more sensitive to unwanted noise intrusion during the evening and at night, an artificial dB increment is added to quiet-time noise levels in a 24-hour noise descriptor called the Community Noise Equivalent Level (CNEL) or Day-Night Noise Level (Ldn). The CNEL descriptor requires that an artificial increment of 5 dBA be added to the actual noise level for the hours from 7:00 am to 10:00 pm and 10 dBA for the hours from 10:00 pm to 7:00 am. The Ldn descriptor uses the same methodology except that there is no artificial increment added to the hours between 7:00 pm and 10:00 pm. Both descriptors give roughly the same 24-hour level, with CNEL being only slightly more restrictive (i.e., higher).

Shielding by Natural or Human-Made Features

A large object or barrier in the path between a noise source and a receptor can substantially attenuate noise levels at the receptor. The amount of attenuation provided by this shielding depends on the size of the object, proximity to the noise source and receptor, surface weight, solidity, and the frequency content of the noise source. Natural terrain features (such as hills and dense woods) and human-made features (such as buildings and walls) can substantially reduce noise levels. Walls are often constructed between a source and a receptor with the specific purpose of reducing noise. A barrier that breaks the line of sight between a source and a receptor will typically result in at least 5 dBA of noise reduction. A very tall barrier may provide as much as 16 dBA of noise reduction.

Psychological and Physiological Effects of Noise

Physical damage to human hearing begins at prolonged exposure to noise levels higher than 85 dBA. Exposure to high noise levels affects our entire system, with prolonged noise exposure in excess of 75 dBA increasing body tensions, and thereby affecting blood pressure, functions of the heart, and the nervous system. In comparison, extended periods of noise exposure above 90 dBA could result in permanent hearing damage. When the noise level reaches 120 dBA, a tickling sensation occurs in the human ear even with short-term exposure. This level of noise is called the threshold of feeling. As the sound reaches 140 dBA, the tickling sensation is replaced by the feeling of pain in the ear. This is called the threshold of pain. A sound level of 190 dBA will rupture the eardrum and permanently damage the inner ear. Figure 3.10-1, *Common Indoor and Outdoor Noise Levels*, shows typical noise levels from familiar noise sources at a specified distance.



Source: ADOT 2028.

Figure 3.10-1
Common Indoor and Outdoor Noise Levels

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VIBRATION FUNDAMENTALS

Vibration is an oscillatory motion through a solid medium, such as the ground or a building. Vibration is normally associated with activities stemming from operations of railroads or vibration-intensive stationary sources but can also be associated with construction equipment such as jackhammers, pile drivers, and hydraulic hammers.

Amplitude

Vibration amplitudes are usually described in terms of either the peak particle velocity (PPV) or the root mean square (RMS) velocity. PPV is the maximum instantaneous peak of the vibration signal, and RMS is the square root of the average of the squared amplitude of the signal. PPV is more appropriate for evaluating potential building damage. The units for PPV are normally inches per second (in/sec). Typically, groundborne vibration generated by human activities attenuates rapidly with distance from the source of the vibration.

The way in which vibration is transmitted through the earth is called propagation. As vibration waves propagate from a source, the energy is spread over an ever-increasing area such that the energy level striking a given point is reduced with the distance from the energy source. This geometric spreading loss is inversely proportional to the square of the distance. The amount of attenuation provided by material damping varies with soil type and condition as well as the frequency of the wave.

As with airborne sound, annoyance with vibrational energy is a subjective measure, depending on the level of activity and the sensitivity of the individual. To sensitive individuals, vibrations approaching the threshold of perception can be annoying. People accustomed to elevated ambient vibration levels, such as in an urban environment, may tolerate higher vibration levels. Table 3.10-1, *Human Reaction to Typical Vibration Levels*, shows the human response and the effects on buildings resulting from continuous vibration (in terms of various levels of PPV).

Groundborne vibration can be a serious concern for nearby neighbors of a transit system route or maintenance facility, causing buildings to shake and rumbling sounds to be heard. It is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads. Most perceptible indoor vibration is caused by sources within buildings, such as the operation of mechanical equipment, movement of people, or the slamming of doors. Typical outdoor sources of perceptible groundborne vibration are heavy construction equipment (such as blasting and pile driving), steel-wheeled trains, and heavy trucks on rough roads. If a roadway is smooth, the groundborne vibration from traffic is rarely perceptible.

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Table 3.10-1 Human Reaction to Typical Vibration Levels

Vibration Level (PPV)	Human Reaction	Effect on Buildings
0.006–0.019 in/sec	Threshold of perception, possibility of intrusion	Vibrations unlikely to cause damage of any type
0.08 in/sec	Vibrations readily perceptible	Recommended upper level of vibration to which ruins and ancient monuments should be subjected
0.10 in/sec	Level at which continuous vibration begins to annoy people	Virtually no risk of “architectural” (i.e., not structural) damage to normal buildings
0.20 in/sec	Vibrations annoying to people in buildings	Threshold at which there is a risk to “architectural” damage to normal dwellings – houses with plastered walls and ceilings
0.4–0.6 in/sec	Vibrations considered unpleasant by people subjected to continuous vibrations and unacceptable to some people walking on bridges	Vibrations at a greater level than normally expected from traffic, but would cause “architectural” damage and possibly minor structural damage

Source: Caltrans 2020.

Notes: PPV = peak particle velocity; in/sec = inches per second.

3.10.1 Regulatory Framework

FEDERAL

Construction Noise and Vibration

The FTA oversees safety measures related to noise and vibration. The FTA’s Transit Noise and Vibration Impact Assessment manual indicates that 80 dBA equivalent sound level (Leq) is reasonable criteria for assessing construction noise levels at residential uses (FTA 2018). In the absence of local construction noise limits, the FTA recommended that the 80 dBA Leq criteria be used to assess the significance of construction noise levels at residential receivers.

The FTA also provides criteria for acceptable levels of groundborne vibration for various types of buildings. Structures amplify groundborne vibration; wood-frame buildings, such as typical residential structures, are more affected by ground vibration than heavier buildings. The level at which groundborne vibration is strong enough to cause architectural damage has not been determined conclusively, but the standards recommended by the FTA are shown in Table 3.10-2, *Federal Transit Administration Construction Vibration Damage Criteria*.

Table 3.10-2 Federal Transit Administration Construction Vibration Damage Criteria

Building/Structural Category	Peak Particle Velocity (PPV) (in/sec)	Approximate Vibration (dB)
I. Reinforced-concrete, steel, or timber (no plaster)	0.5	102
II. Engineered concrete and masonry (no plaster)	0.3	98
III. Non-engineered timber and masonry buildings	0.2	94
IV. Buildings extremely susceptible to vibration damage	0.12	90

Source: FTA 2018.

Notes: in/sec = inches per second; dB = decibel.

According to the FTA's Transit Noise and Vibration Impact Assessment Manual, a vibration velocity (VdB) of 75 to 80 VdB will annoy individuals. Table 3.10-3, *Human Response to Different Levels of Groundborne Vibration and Noise*, presents the human response to different levels of groundborne vibration and noise. For purposes of analysis in this Draft EIR, the threshold of 75 VdB will be applied.

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Table 3.10-3 Human Response to Different Levels of Groundborne Vibration and Noise

Vibration Velocity Level	Noise Level		Human Response
	Low Frequency	Mid-Frequency	
65 VdB	25 dBA	40 dBA	Approximate threshold of perception for many humans. Low-frequency sound: usually inaudible. Mid-frequency sound: excessive for quiet sleeping areas.
75 VdB	35 dBA	50 dBA	Approximate dividing line between barely perceptible and distinctly perceptible. Many people find transit vibration at this level annoying. Low-frequency noise: tolerable for sleeping areas. Mid-frequency noise: excessive in most quiet occupied areas.
85 VdB	45 dBA	60 dBA	Vibration tolerable only if there are an infrequent number of events per day. Low-frequency noise: excessive for sleeping areas. Mid-frequency noise: excessive even for infrequent events for some activities.

Source: FTA 2018, Table 5-5.

Low Frequency = Approximate noise level when vibration spectrum peak is near 30 hertz (Hz).

Mid Frequency = Approximate noise level when vibration spectrum peak is near 60 Hz.

STATE

California Code of Regulations

Title 24, Part 11. The State of California's noise insulation standards for nonresidential uses are codified in the California Code of Regulations, Title 24, Part 11, California Green Building Standards Code (CALGreen). CALGreen noise standards are applied to new or renovation construction projects in California to control interior noise levels resulting from exterior noise sources. Proposed projects may use either the prescriptive method (Section 5.507.4.1) or the performance method (5.507.4.2) to show compliance. Under the prescriptive method, a project must demonstrate transmission loss ratings for the wall and roof-ceiling assemblies and exterior windows when located within a noise environment of 65 dBA CNEL or higher. Under the performance method, a project must demonstrate that interior noise levels do not exceed 50 dBA Leq (1-hr).

Title 5, Section 14040(q). Under Title 5, the California Department of Education (CDE) regulations require a school district to consider noise in the site selection process. As recommended by CDE guidance, if a school district is considering a potential school site near a freeway or other source of noise, it should hire an acoustical engineer to determine the level of sound that the site is exposed to and to assist in designing the school should that site be chosen.

LOCAL

Town of Paradise General Plan

The Town of Paradise General Plan Noise Element identifies goals, objectives, policies, and implementation measures aimed at maintaining a healthy noise environment and serves as a guideline for compliance with State noise insulation standards. The following goals, objectives, and policies are applicable to the proposed project:

Goals

NG-1: Preserve the quiet, rural environment of the town and surrounding areas.

NG-2: Protect town residents from the harmful and annoying effects of exposure to excessive noise.

NG-3: Protect the economic base of the town by preventing incompatible land uses from encroaching upon existing or planned noise producing uses.

Objectives

- **NOI-1:** New development of noise-sensitive uses shall not be allowed where the noise level due to non-transportation noise sources will exceed the noise level standards of Table 6. 4-1 [Table 3.10-4 of this document], as measured immediately within the property line of the new development, unless effective noise mitigation measures have been incorporated into the development design to achieve the standards specified in Table 6.4-1 [Table 3.10-4 of this document].
- **NOI-2:** Noise created by new proposed non-transportation noise sources shall be mitigated so as not to exceed the noise level standards of Table 6.4-1 [Table 3.10-4 of this document] as measured immediately within the property line of lands designated for noise-sensitive uses. This objective does not apply to noise sources associated with agricultural operations on lands zoned for agricultural uses.
- **NOI-3:** New development of noise-sensitive land uses will not be permitted in areas exposed to existing or projected levels of noise from transportation noise sources which exceed the levels specified in Table 6.4-2 [Table 3.10-5 of this document].

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- **NOI-4:** Noise created by new transportation noise sources, including roadway improvement projects, shall be mitigated so as not to exceed the levels specified in Table 6.4-2 [Table 3.10-5 of this document] at outdoor activity areas or interior spaces of existing noise-sensitive land uses in either the incorporated or unincorporated areas.

Table 3.10-4 Noise Level Performance Standards for New Projects Affected by or Including Non-Transportation Sources

Noise Level Descriptor	Daytime (7:00 am to 10:00 pm)	Nighttime (10:00 pm to 7:00 am)
Hourly Leq, dB	50	45
Maximum level, dB	70	65

Source: Table 6.4-1 Town of Paradise General Plan Noise Element.

Notes: Each of the noise levels specified above shall be lowered by 5 dBA for simple tone noises, noises consisting primarily of speech or music, or for recurring impulsive noises. These noise level standards do not apply to residential units established in conjunction with industrial or commercial uses (e.g., caretaker dwellings).

dB = A-weighted decibels or dBA.

Table 3.10-5 Maximum Allowable Noise Exposure for Transportation Noise Sources

Land Use	Outdoor Activity Areas ¹ Ldn/CNEL, dB	Interior Spaces	
		Ldn/CNEL, dB	Leq, dB ²
Residential	60 ³	45	--
Transient Lodging	60 ³	45	--
Hospitals, Nursing Homes	60 ³	45	--
Theaters, Auditoriums, Music Halls	--	--	35
Churches, Meeting Halls	60 ³	--	40
Office Buildings	60 ³	--	45
Schools, Libraries, Museums	--	--	45
Playgrounds, Neighborhood Parks		45 dBA	60 dBA

Source: Table 6.4-2 of Town of Paradise General Plan Noise Element.

1. Where the location of outdoor activity areas is unknown, the exterior noise level standard shall be applied to the property line of the receiving land use.

2. As determined for a typical worst-case hour during periods of use.

3. Where it is not possible to reduce noise in outdoor activity areas to 60 dB Ldn/CNEL or less using a practical application of the best-available noise reduction measures, an exterior noise level of up to 65 dB Ldn/CNEL may be allowed provided that available exterior noise level reduction measures have been implemented and interior noise levels are in compliance with this table.

dB = A-weighted decibels or dBA.

Policies

- **NP-1.** Where proposed nonresidential land uses are likely to produce noise levels exceeding the performance standards of Table 6.4-1 [Table 3.10-4 of this document] at existing or planned noise sensitive uses, an acoustical analysis shall be required as part of the environmental review process so that noise mitigation may be included in the project design.
- **NP-2.** The feasibility of proposed projects with respect to existing and future transportation noise levels should be evaluated by comparison to Figure 6.4-1 [Table 3.10-4 of this document], Land Use Compatibility Guidelines.
- **NP-3.** Where noise-sensitive land uses are proposed in areas exposed to existing or projected exterior noise levels exceeding the levels specified in Table 6. 4-2 [Table 3.10-5 of this document] or the performance standards of Table 6.4-1 [Table 3.10-4 of this document], an acoustical analysis shall be required as part of the environmental review process so that noise mitigation may be included in the project design.
- **NP-4.** Where noise mitigation measures are required to achieve the standards of Tables 6.4-1 and 6.4-2 [Tables 3.10-4 and 3.10-5 of this document], the emphasis of such measures shall be placed upon site planning and project design. The use of noise barriers should be considered a supplemental means of achieving the noise standards after all practical design-related noise mitigation measures have been integrated into the project.
- **NP-5.** Acoustical analyses should be prepared in accordance with the requirements of Table 6.4-3 [Table 3.10-6 of this document].
- **NP-6.** New land uses within the projected 55 dB Ldn contour of Paradise Skypark Airport shall be compatible with aircraft-generated noise. Single-family residential and institutional land uses such as schools, hospitals, convalescent homes, and other inpatient health care facilities shall not be permitted.
- **NP-8.** The town should endeavor to preserve quiet residential areas by limiting traffic and noise generating uses in such areas.

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Table 3.10-6 Requirements for an Acoustical Analysis

A.	Be the responsibility of the applicant.
B.	Be prepared by a qualified person experienced in the fields of environmental noise assessment and architectural acoustics.
C.	Include representative noise level measurements with sufficient sampling periods and locations to adequately describe local conditions and the predominant noise sources.
D.	Estimate existing and projected (20 years) noise levels in terms of Ldn or CNEL and/or the standards of Table I-1 and compare those levels to the adopted policies of the Noise Element.
E.	Recommend appropriate mitigation to achieve compliance with the adopted policies and standards of the Noise Element. Where the noise source in question consists of intermittent single events, the report must address the effects of maximum noise levels in sleeping rooms in terms of possible sleep disturbance.
F.	Estimate noise exposure after the prescribed mitigation measures have been implemented.
G.	Describe a post-project assessment program which could be used to evaluate the effectiveness of the proposed mitigation measures.

Source: Table 6.4-3, Town of Paradise General Plan Noise Element.

Town of Paradise Code of Ordinances

The Town of Paradise's regulations with respect to noise are included in Chapter 9.18, Noise Control, of the Code of Ordinances. To control unnecessary, excessive, and annoying noise in the town, it is the public policy of the Town to regulate such noise generated from or by all sources as specified in the Noise Control chapter. The following sections of the Code of Ordinances are applicable to the proposed project.

Section 9.18.140 Loading and unloading.

It is unlawful and in violation of this chapter for any person to load, unload, open, close or otherwise handle boxes, crates, containers, building materials, garbage cans or similar objects between the hours of ten p.m. and six a.m. in such a manner that creates noise clearly audible across a residential zoned or a commercial zoned real property boundary.

Section 9.18.160, Construction or demolition—Generally.

It is unlawful and in violation of this chapter for any person to operate or cause the operation of any tools equipment used in construction, drilling, repair, alteration, or demolition work between the hours seven p.m. and six a.m. on weekdays or at any time on Sundays or holidays, in such a manner that creates noise clearly audible across a residential zoned or a commercial zoned real property boundary, except for emergency work being performed by a public agency or a public utility.

3.10.2 Existing Conditions

EXISTING NOISE ENVIRONMENT

The primary existing noise sources in the project vicinity are traffic on Elliot Road, which runs along the south of the project site and to a lesser extent, traffic on Maxwell Drive. Additional area noise sources include ongoing reconstruction operations in the Town of Paradise and residential activities.

SENSITIVE NOISE RECEPTORS

Certain land uses are particularly sensitive to noise and vibration. These uses may include residences, schools, libraries, churches, hospitals, nursing homes, and other health care facilities. Day care centers, parks, and other outdoor recreation areas may also be considered sensitive receptors. Moderately sensitive land uses could include cemeteries, golf courses, hotels and motels, and dormitories. The nearest sensitive receptors to the project site are residential uses to the north, west, and east of the project site, and the Paradise Cemetery to the south of the project site.

AMBIENT NOISE MEASUREMENTS

Ambient noise monitoring was conducted within the plan area by PlaceWorks on Tuesday, November 18, 2025, to establish baseline noise levels at noise-sensitive residential receptors near the project site. Measurements were conducted during weekday periods when the project area is expected to be most active. Short-term (15-minute) measurements were conducted at four locations on the south, east, and west portions of the project site. The locations of the short- and long-term measurements are shown on Figure 3.10-2, *Approximate Noise Monitoring Locations*.

Monitoring for the short-term measurements was performed using a Larson-Davis Model LxT sound level meter, which satisfies the American National Standards Institute (ANSI) standard for Type I instrumentation. The meter was calibrated prior to and after each monitoring period. All measurements were at least five feet above the ground and away from reflective surfaces. Meteorological conditions during the measurement periods were favorable for outdoor noise measurements and were noted to be representative of the typical conditions for the season. All sound level meters were equipped with a windscreen during measurements.

The short-term measurement results are detailed herein and summarized in Table 3.10-7, *Short-Term Noise Measurements Summary*. Locations of short-term measurements are shown on Figure 3.10-2. All short-term measurements were conducted for 15-minute durations.

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Table 3.10-7 Short-Term Noise Measurements Summary

Monitoring Location	Description	15-minute Noise Level, dBA						
		Leq	Lmax	Lmin	L50	L25	L8	L2
ST-1	280 feet from the center line of Elliot Road, 93 feet southeast of the residence at 881 Elliot Road.	49.3	60.4	37.6	46.8	50.3	53.2	56.0
ST-2	84 feet west of the Elliot Road centerline, 332 feet southeast of the residence at 881 Elliot Road.	56.2	69.6	37.8	47.6	56.0	61.7	65.1
ST-3	Approximately 16 feet south of the Elliot Road centerline, 543 feet southwest of the residence at 5871 Jaguar Court.	66.1	78.4	41.0	58.0	65.8	71.8	74.9
ST-4	Approximately 142 feet east of the Maxwell Drive centerline, 67 feet west of the residence at 5871 Jaguar Court.	54.9	72.6	38.2	48.9	52.4	57.1	64.9

Source: PlaceWorks 2025. See EIR Appendix F.

Short-Term Location 1 (ST-1) monitoring site was conducted 280 feet from the center line of Elliot Road, 93 feet southeast of the residence at 881 Elliot Road. The 15-minute noise measurement began at 10:36 am on Tuesday, November 18, 2025. The noise environment of this site is characterized by vehicle traffic on Elliot Road, wind, and birds chirping. Occasional sounds from birds chirping, people talking at nearby residences, and a school bell ringing could be heard. During the measurement period, 18 autos, 38 medium-duty vehicles, and 4 heavy-duty vehicles were counted. Noise levels measured 49.3 dBA Leq and 60.4 dBA Lmax during the measurement period at ST-1.

Short-Term Location 2 (ST-2) monitoring site was conducted 332 feet southeast of the residence at 881 Elliot Road and 84 feet west of Elliot Road centerline. The 15-minute noise measurement began at 10:54 am on Tuesday, November 18, 2025. The noise environment of this site is characterized primarily by vehicle traffic passing on Elliot Road. Occasional sounds from a leaf blower, dog barking, bird noises, and people talking in nearby residences could be heard. During the measurement period, 13 autos, 36 medium-duty vehicles, and 0 heavy-duty vehicles were counted on Elliot Road. Noise levels measured 56.2 dBA Leq and 69.6 dBA Lmax during the measurement period at ST-2.

PARADISE HIGH SCHOOL EXPANSION PROJECT DRAFT EIR
PARADISE UNIFIED SCHOOL DISTRICT



Source: Nearmap 2025.

Figure 3.10-2
Approximate Noise Monitoring Locations

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Short-Term Location 3 (ST-3) monitoring site was approximately 543 feet southwest of the residence at 5871 Jaguar Court and approximately 16 feet south of Elliot Road centerline. A 15-minute noise measurement began at 9:23 am on Tuesday, November 18, 2025. The noise environment of this site is characterized primarily by vehicular traffic. During the measurement period, 33 autos, 42 medium-duty vehicles, and 2 heavy-duty vehicles were counted on Elliot Road. Noise levels measured 66.1 dBA Leq and 78.4 dBA Lmax during the measurement period at ST-3.

Short-Term Location 4 (ST-4) monitoring site was approximately 67 feet west of the residence at 5871 Jaguar Court, and approximately 142 feet east of Maxwell Drive centerline and 116 feet from Elliot Road centerline. A 15-minute noise measurement began at 9:45 am on Wednesday, November 18, 2025. The noise environment of this site is characterized primarily by vehicular traffic. Occasional sounds from nearby birds could be heard. During the measurement period, 29 autos, 44 medium-duty vehicles, and 2 heavy-duty vehicles were counted on Elliot Road. Noise levels measured 54.9 dBA Leq and 72.6 dBA Lmax during the measurement period at ST-4.

3.10.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, *Environmental Checklist Form*, of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact related to noise if it would:

- a) Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.
- b) Generate excessive groundborne vibration or groundborne noise levels.
- c) For a project within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels.

THRESHOLD GUIDANCE

Construction Noise

The Town's Code of Ordinances, Section 9.18.160, limits construction activities to Mondays through Saturdays between the hours of 6:00 am and 7:00 pm, and at no time on Sundays or holidays. The Town of Paradise does not have a quantified threshold for temporary construction noise. Therefore, to determine impact significance, the FTA criteria are used in this analysis. A

3.10 NOISE

construction noise impact would occur if project construction generates noise levels greater than 80 dBA Leq at a residential location.

Stationary Source Noise

The Town's General Plan Noise Element establishes exterior performance standards with maximum permissible noise level applied at the property line of the receiving use. A significant impact would occur if the proposed project exceeds the Town's stationary noise standards of 50 dBA Leq or 70 dBA Lmax during daytime hours and 45 dBA Leq or 65 dBA Lmax during nighttime hours, as summarized in Table 3.10-4.

Transportation Noise

A project will normally have a significant effect on the environment related to noise if transportation noise would substantially increase the ambient noise levels for adjoining noise-sensitive areas. Most people can detect changes in sound levels of approximately 3 dBA under normal, quiet conditions, and changes of 1 dBA to 3 dBA are detectable under quiet, controlled conditions. Changes of less than 1 dBA are usually indiscernible. A change of 5 dBA is readily discernible to most people in an exterior environment. Based on this, the following thresholds of significance, similar to those recommended by the Federal Aviation Administration, are used to assess traffic noise impacts at sensitive receptor locations. A significant impact would occur if project traffic noise increases would exceed:

- 1.5 dBA in ambient noise environments of 65 dBA CNEL and higher
- 3 dBA in ambient noise environments of 60 to 64 dBA CNEL
- 5 dBA in ambient noise environments of less than 60 dBA CNEL

A significant cumulative traffic noise impact occurs when these thresholds are exceeded under cumulative conditions (with project) and the contribution of the project to future traffic is calculated to be greater than 5 dBA CNEL, based on ambient noise levels.

Stadium Event Noise

As discussed previously, a change of 5 dBA is readily discernible in an exterior environment and a change in 10 dBA is perceived as a doubling in sound level. Based on this and noted that stadium events would result in temporary periodic increases in ambient noise levels, a threshold of 10 dBA above the ambient is typically applied. A project-related operational noise increase of 10 dBA above ambient noise levels for stadium events would be the threshold for a noise impact.

Vibration

The FTA vibration criteria, shown in Table 3.10-2, are used to evaluate vibration annoyance and structural damage. The potential for construction-related vibration annoyance impacts to be

objectionable depends on the magnitude of vibration generated by the construction equipment, the frequency of occurrence of the vibration during the construction day, and total duration of construction activities.

METHODOLOGY

This noise evaluation was prepared in accordance with the requirements of CEQA to determine if the proposed project would result in significant construction and operational impacts at nearby sensitive receptors. Due to the *California Building Industry Association v. Bay Area Air Quality Management District*, 62 Cal. 4th 369 (No. S 213478) ruling issued December 17, 2015, noise compatibility for on-site sensitive receptors is generally no longer the purview of CEQA. Therefore, noise compatibility for on-site sensitive receptors, such as students and staff, is not subject to CEQA significance determinations. However, the project must comply with applicable Town regulations and building standards to ensure a suitable acoustic environment for educational use.

The construction noise analysis uses the Roadway Construction Noise Model (RCNM) based on an anticipated equipment mix for individual construction activities verified by the applicant. The simultaneous use of the three loudest pieces of equipment for each construction activity is modeled from the appropriate acoustical center of the construction activity to the nearest sensitive receptor property line. Groundborne vibration and vibration noise are determined using FTA methodology and reference vibration levels for typical construction equipment (FTA 2018). Construction activities would be subject to the Town's Code of Ordinances Section 9.18.160, which limits work to the hours between 6:00 am and 7:00 pm Monday through Saturday, and at no time during Sundays or holidays.

Traffic noise increases were estimated using a version of the Federal Highway Administration (FHWA) Traffic Noise Prediction Model and average daily traffic (ADT) along study roadway segments provided by DJ&A (Appendix G, *Traffic Impact Analysis*). Noise impacts from non-transportation, stationary noise sources are based on the performance standards in Table 3.10-4 (from Table 6.4-1 of the Town of Paradise General Plan Noise Element).

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3.10.4 Project Impact Analysis

-
- a) **Would the project generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local General Plan or noise ordinance, or applicable standards of other agencies?**
-

Construction Noise

Noise generated by on-site construction equipment is based on the type of equipment used, its location relative to sensitive receptors, and the timing and duration of noise-generating activities. Each phase of construction involves different types of equipment and has distinct noise characteristics. Noise levels from construction activities are typically dominated by the loudest three pieces of equipment. The dominant equipment noise source is typically the engine, although work-piece noise (e.g., dropping of materials) can also be noticeable.

The noise produced at each construction phase is determined by combining the Leq contributions from the three loudest pieces of equipment used at a given time, while accounting for the ongoing time-variations of noise emissions (commonly referred to as the usage factor). Heavy equipment, such as a dozer or a loader, can have maximum, short-duration noise levels of up to 85 dBA at 50 feet. However, overall noise emissions vary considerably, depending on what specific activity is being performed at any given moment.

Noise attenuation due to distance, the number and type of equipment, and the load and power requirements to accomplish tasks at each construction phase would result in different noise levels from construction activities at a given receptor. Since noise from construction equipment is intermittent and diminishes at a rate of at least 6 dBA per doubling of distance (conservatively disregarding other attenuation effects from air absorption, ground effects, and shielding effects provided by intervening structures or existing solid walls), the average noise levels at noise-sensitive receptors could vary considerably, because mobile construction equipment would move around the site (site of each development phase) with different equipment mixes, loads, and power requirements.

The project would be constructed in two phases. Phase 1 would construct the agricultural building and Phase 2 would construct the new parking lot and stadium. The expected construction equipment mix was estimated and categorized by construction activity using the FHWA RCNM. Equipment for grading and site preparation is modeled at spatially averaged distances (i.e., from the acoustical center of the general construction site to the property line of the nearest receptors) because the area around the center of construction activities best represents the potential average construction-related noise levels at the various sensitive receptors for mobile equipment. Building construction and architectural coating are measured

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from the edge of proposed buildings to the nearest sensitive receptors. Additionally, paving is measured from the area of the nearest paving activities to the nearest sensitive receptors. The nearest receptor to the project site of Phase 1, residence to the west, would be exposed to intermittent construction noise levels of up to 79 dBA Leq during construction-related activities. Construction noise levels at receptors further away are estimated to be even less. Results are summarized in Table 3.10-8, *Project-Related Phase 1 Construction Noise Levels at the Nearest Receptors (dBA)*.

Table 3.10-8 Project-Related Phase 1 Construction Noise Levels at the Nearest Receptors (dBA)

Construction Activity Phase	Noise Levels in dBA Leq				
	RCNM Reference Noise Level	Receptor to North	Receptor to East	Receptor to South	Receptor to West
<i>Distance (feet)</i>	50	295	140	255	95
Asphalt Demolition	85	70	76	71	79
Site Preparation	81	66	72	67	76
Grading	84	69	75	70	79
<i>Distance (feet)</i>	50	280	125	235	70
Building Construction	79	64	71	66	76
Architectural Coating	77	62	69	64	74
<i>Distance (feet)</i>	50	275	125	220	55
Paving	80	65	72	67	79
Exceeds 80 dBA Leq Standard?	No	No	No	No	No

Source: FHWA 2006.

Notes: Distance measurements were taken using Google Earth (2025) from the area of anticipated construction to the property line of the nearest receptors.

dBA Leq = Energy Average Sound Level

The nearest receptor to the project site of Phase 2, residence to the west, would be exposed to intermittent construction noise levels of up to 79 dBA Leq during construction-related activities. Construction noise levels at receptors further away are estimated to be even less. Results are summarized in Table 3.10-9, *Project-Related Phase 2 Construction Noise Levels at the Nearest Receptors (dBA)*.

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Table 3.10-9 Project-Related Phase 2 Construction Noise Level at the Nearest Receptors (dBA)

Construction Activity Phase	Noise Levels in dBA Leq				
	RCNM Reference Noise Level	Receptor to North	Receptor to East	Receptor to South	Receptor to West
Distance (feet)	50	185	295	210	145
Demolition	85	74	70	73	76
Site Prep	81	70	66	69	72
Grading	84	73	69	72	75
Distance (feet)	50	75	325	120	545
Stadium Construction	79	75	63	71	58
Distance (feet)	50	125	750	170	100
Parking Lot Construction	80	72	56	69	74
Distance (feet)	50	200	650	135	440
Architectural Coating	77	65	55	68	58
Exceeds 80 dBA Leq Standard?		No	No	No	No

Source: FHWA 2006.

Notes: Distance measurements were taken using Google Earth (2025) from the area of anticipated construction to the property line of the nearest receptors.

dBA Leq = Energy Average Sound Levels

Project construction would be confined to the hours in Section 9.18.160 of the Town's Code of Ordinances, which limits construction activities to Mondays through Saturdays between the hours of 6:00 am and 7:00 pm, and at no time on Sundays or holidays. Construction noise levels would not exceed the FTA's threshold of 80 dBA Leq at adjacent uses; however, project construction noise would create a substantial temporary increase in ambient noise levels in the vicinity of the project site at noise-sensitive uses. Therefore, this impact is **potentially significant**.

Significance without Mitigation: Potentially significant.

Impact NOI-1: Construction activities associated with the proposed project occurring near sensitive receptors would create a substantial temporary increase in ambient noise levels.

Mitigation Measure NOI-1: The Paradise Unified School District (PUSD or District) construction contract bid shall be required to include, but not be limited to, the following noise-reduction measures:

- Construction activity is limited to Mondays through Saturdays between the hours of 6:00 am and 7:00 pm, and at no time on Sundays or holidays, as prescribed in the Code of Ordinances Section 9.18.160.
- During the entire active construction period, equipment and trucks used for project construction shall use the best-available noise control techniques wherever feasible (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds).
- Impact tools (e.g., jack hammers and hoe rams) shall be hydraulically or electrically powered wherever possible. Where the use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used along with external noise jackets on the tools.
- Stationary equipment, such as generators and air compressors, shall be located as far as feasible from adjacent noise-sensitive uses.
- Install localized noise barriers for stationary equipment when located within 50 feet of adjacent noise-sensitive property lines.
- Stockpiling shall be located as far as feasible from nearby noise-sensitive receptors.
- At least 10 days prior to the start of construction activities, a sign shall be posted at the entrance(s) to the job site, clearly visible to the public, that includes permitted construction days and hours as well as the telephone numbers of the District's and contractor's authorized representatives that are assigned to respond in the event of a noise or vibration complaint. If the authorized contractor's representative receives a complaint, he/she shall investigate, take appropriate corrective action, and report the action to the District.

Implementation of Mitigation Measure NOI-1 would reduce noise impacts on sensitive receptors during construction to the extent feasible through implementation of construction best management practices. Construction noise levels would be reduced by 6 dBA with the use of the best-available noise-control techniques, specifically the use of proper engine mufflers and localized barriers for stationary construction equipment.

Significance with Mitigation: Less than significant.

Traffic Noise

A project will normally have a significant effect on the environment related to traffic noise if it substantially increases the ambient noise levels for adjoining areas. Changes of less than 1 dBA are usually indiscernible. A change of 5 dBA is readily discernible to most people in an outdoor

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environment. Noise levels above 65 dBA CNEL are normally unacceptable at sensitive receptor locations such as residences, schools, and noise environments in these areas would be considered degraded. Based on this, a significant impact would occur if the following traffic noise increases occur relative to the existing noise environment:

- 1.5 dBA in ambient noise environments of 65 dBA CNEL and higher
- 3 dBA in ambient noise environments of 60 to 64 dBA CNEL
- 5 dBA in ambient noise environments of less than 60 dBA CNEL

A traffic analysis was conducted by DJ&A (2026). The proposed project is not expected to increase existing daily trips with implementation of the proposed project. The proposed Paradise High School improvements will allow existing practices and games to be scheduled later in the day and evening during winter months and would not result in an increase in the level or number of activities and would not generate an increase in daily traffic trips to the project site. Implementation of proposed project would not result in a traffic noise increase over existing conditions. Therefore, project-related traffic noise impacts would be **less than significant**.

Parking Lot Noise Impacts

Upon project completion, there would be up to 121 parking spaces on the western portion of the project site. Residential uses are west of and adjacent to proposed parking stalls that could expose sensitive receptors to noise due to vehicles idling, doors opening and closing, and voices in the parking lots. These activities would take place for short periods of approximately 5 to 10 minutes during football stadium events. These short-term parking lot activities would occur during the daytime and evening hours. Based on previous noise measurements, a single-event noise exposure level (SEL) associated with a parking lot stall is typically 71 dBA SEL at 50 feet. Conservatively assuming that each parking stall was to fill and empty (242 future parking events total) during the peak hour, parking lot noise level is predicted to be 59 dBA Leq at 50 feet. The nearest residential use is approximately 170 feet from the nearest proposed parking lane and 260 feet from the center of the parking lot. Resulting parking lot noise levels would range from 45 dBA to 49 dBA. As a result, parking lot noise would not exceed the Town's daytime exterior noise standards of 50 dBA Leq and 70 dBA Lmax at the nearest noise-sensitive receptor. In addition, the football stadium noise levels would result in a less than 3 dBA increase over ambient noise levels at receptors to the east, south, and west. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant

Stadium Noise

The proposed project would install a new football stadium and practice field on the project site, near the intersection of Maxwell Drive and Elliott Road. The new sports field would consist of a

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new PA system, bleachers, concession stand, and restrooms. The new stadium would be used for sporting events, graduation ceremonies, community events, and physical education for students at Paradise High School. New bleachers would be installed on the northern and southern side of the proposed field. The proposed bleachers would have a capacity of 2,500 spectators, with 1,500 spectators on the home side on the northern side of the field, and 1,000 spectators on the visitor's side located on the southern side of the field.

Similar to the existing sporting event and practices schedule, the proposed project would allow stadium events within the hours of 3:30 pm to 9:30 pm. Additionally, the maximum number of attendees under the proposed project are expected to remain the same as existing conditions. The proposed project would not result in any changes to the number of participants, time of year (season), or number of spectators for practices and games.

As discussed previously, a change of 5 dBA is readily discernible in an exterior environment and a change in 10 dBA is perceived as a doubling in sound level. Based on this and noted that stadium events would result in temporary periodic increases in ambient noise levels, a threshold of 10 dBA above the ambient level is typically applied. A project-related operational noise increase of 10 dBA above ambient noise levels for stadium events would be the threshold for a noise impact.

Table 3.10-10, *Stadium Noise Levels*, shows ambient noise measurements and stadium operational noise levels associated with the proposed project at adjacent representative receptor locations. Noise levels for a stadium event with spectators and a public address system, are conservatively assumed to be 75 dBA Leq and 85 dBA Lmax at 50 feet from the center of the field. The nearest noise-sensitive receptor (ST-4) to the center of the stadium is approximately 205 feet to the east.

Table 3.10-10 Stadium Noise Levels

Receptors	Ambient Conditions Measurement, dBA		Stadium Noise, dBA		Increase Over Ambient, dBA	
	Leq	Lmax	Leq	Lmax	Leq	Lmax
ST-1	49	60	52	68	3	8
ST-2	56	70	52	74	<1	5
ST-3	66	78	63	74	<1	<1
ST-4	55	73	56	74	1	1

Notes: dBA = A-weighted decibels, dBA Leq = Energy Average Sound Levels, Lmax = instantaneous maximum noise level

As shown in Table 3.10-10, future stadium event noise levels would range from 52 dBA to 63 dBA Leq and 68 dBA to 74 dBA Lmax at the nearest noise-sensitive receptors to the project

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site. Future stadium events would result in noise level increases of up to 3 dBA Leq and 8 dBA Lmax over ambient conditions. Future schoolwide stadium events would not result in a 10 dBA increase above ambient noise conditions at the nearest noise-sensitive receptors to the project site. With implementation of the proposed project, football stadium noise levels would result in a less than 8 dBA temporary and periodic increase over ambient noise levels at adjacent receptors. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant

b) Would the project generate excessive groundborne vibration or groundborne noise levels?

Construction

Construction activities have the potential to generate varying degrees of ground vibration, depending on the construction procedures and equipment. The use of construction equipment generates vibrations that spread through the ground and diminish with distance from the source. The effect on buildings in the vicinity of the construction site varies depending on soil type, ground strata, and receptor-building construction. The effects from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight structural damage at the highest levels. Vibration from construction activities rarely reaches levels that can damage structures.

For reference, a vibration level of 0.2 in/sec PPV is used as the limit for nonengineered timber and masonry buildings, which would conservatively apply to the surrounding structures (FTA 2018). Typical construction equipment can generate vibration levels ranging from 0.21 in/sec PPV at 25 feet. The project proposes constructing a parking lot and football stadium west of Maxwell Drive and an agricultural building west of Maxwell Drive and existing residences.

Table 3.10-11, *Phase 1 Agricultural Building Construction Vibration Damage Levels*, summarizes vibration levels for typical construction equipment at a reference distance of 25 feet and the nearest sensitive receptor. The nearest off-site receptors are the residences to the west approximately 45 feet of the nearest construction impact area (paving).

Table 3.10-11 Phase 1 Agricultural Building Construction Vibration Damage Levels

Equipment	Levels, PPV (in/sec)				
	FTA Reference at 25 Feet	Receptor to North at 50 feet	Receptor to East at 225 feet	Receptor to South at 265 feet	Receptor to West at 45 feet
Vibratory Roller	0.21	0.074	0.008	0.006	0.087
Large Bulldozer	0.089	0.031	0.003	0.003	0.037
Caisson Drilling	0.089	0.031	0.003	0.003	0.037
Loaded Trucks	0.076	0.027	0.003	0.002	0.031
Jackhammer	0.035	0.012	0.001	0.001	0.014
Small Bulldozer	0.003	0.001	0.000	0.000	0.001
Exceed 0.2 in/sec PPV Standard?		No	No	No	No

Sources: FTA 2018; Caltrans 2020.

Table 3.10-12, *Phase 2 Football Stadium Construction Vibration Damage Levels*, summarizes vibration levels for typical construction equipment at a reference distance of 25 feet and the nearest sensitive receptor. The nearest off-site receptors are the residences to the west, approximately 55 feet from the nearest construction impact area (building foundation).

Table 3.10-12 Phase 2 Football Stadium Construction Vibration Damage Levels

Equipment	Levels, PPV (in/sec)				
	FTA Reference at 25 Feet	Receptor to North at 325 feet	Receptor to East at 200 feet	Receptor to South at 345 feet	Receptor to West at 55 feet
Vibratory Roller	0.21	0.004	0.009	0.004	0.064
Large Bulldozer	0.089	0.002	0.004	0.002	0.027
Caisson Drilling	0.089	0.002	0.004	0.002	0.027
Loaded Trucks	0.076	0.002	0.003	0.001	0.023
Jackhammer	0.035	0.001	0.002	0.001	0.011
Small Bulldozer	0.003	0.000	0.000	0.000	0.001
Exceed 0.2 in/sec PPV Standard?		No	No	No	No

Source: FTA 2018; Caltrans 2020.

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As shown in Tables 3.10-11 and 3.10-12, the proposed construction activities would not exceed the 0.2 in/sec PPV FTA standard. Therefore, construction vibration damage impacts would be **less than significant**.

Significance without Mitigation: Less than significant

Operation

The proposed project's operational activities would not include any substantial long-term vibration sources. Therefore, **no impact** would occur.

Significance without Mitigation: No impact.

-
- c) **For a project within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?**
-

The project site is approximately three miles north of Paradise Airport. The project site is not within the 60 dBA CNEL airport noise contour of Paradise Airport. The proposed project would not expose people working in the project area to excessive aircraft noise levels. Therefore, **no impact** would occur.

Significance without Mitigation: No impact.

3.10.5 Cumulative Impact Analysis

As defined in Section 15130 of the CEQA Guidelines, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects within the cumulative impact area for noise. The project site is in an area that is considered a recovering semi-rural setting that includes residential, public/quasi-public, and educational uses.

The geographic scope of the cumulative noise analysis with respect to substantial or permanent increase in ambient noise and groundborne vibration or groundborne noise levels is limited by the range of potential noise and vibration impacts. Noise and vibration impacts tend to be localized; they decrease rapidly in magnitude as the distance from the source to the receptor increases and may be shielded by intervening structures. Projects that are in the direct vicinity of the project site would have the potential to be considered in a cumulative context with the proposed project's contribution. Therefore, noise impacts for construction are limited to approximately 1,500 feet from the source, stationary noise sources are limited to approximately 500 feet from the source, and noise impacts for traffic are limited to affected roadways. No

major sources of groundborne vibration sources were identified in the vicinity of the project site.

Would the project have a cumulative effect related to noise?

Construction

Construction noise and vibration are localized noise sources that decrease rapidly with an increase in distance, acoustic shielding provided by intervening building facades or existing noise walls, and proposed construction activities. Cumulative impacts would only occur if other projects are being constructed in the vicinity of the project site at the same time as the proposed project. The area surrounding the project site is semi-developed and consists of residential and public/quasi-public uses. There are no active or pipeline projects within the vicinity of the project site that would combine with the proposed project's construction noise and vibration to create cumulatively considerable impacts. As with the proposed project reducing project construction noise per Mitigation Measure NOI-1, other projects would be required to comply with the Town's Noise Ordinance and applicable General Plan policies related to noise. Potential overlap of construction of the proposed project and other projects would not expose noise-sensitive uses to cumulative construction impacts due to the distances to the nearest noise-sensitive receptors. Therefore, the proposed project would not contribute to a significant cumulative construction noise or vibration impact.

Operation

Operation of the proposed project would not exceed the Town's noise standards or exceed increase over ambient thresholds, as shown in Table 3.10-10. There are no other nearby sources of stationary noise in the project area that would significantly contribute to the ambient noise environment near the project site.

A significant cumulative traffic noise increase would be identified if project traffic were calculated to contribute 1.5 dBA or more under Cumulative Plus Project conditions to a significant traffic noise increase over existing conditions. That is, if a cumulative traffic noise increase is greater than 1.5 dBA, 3 dBA, or 5 dBA relative to the existing environment significance threshold (less than 60 CNEL dBA, 60 to 65 CNEL dBA, greater than 65 CNEL dBA, respectively) is calculated. The proposed project is not expected to increase existing daily trips with implementation of the proposed project. Therefore, cumulative traffic noise impacts would be **less than significant**.

Significance without Mitigation: Less than significant

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3.10.6 References

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- FHWA (Federal Highway Administration). 1978, December. Federal Highway Traffic Noise Prediction Model. Report No. FHWA-RD77-108. US Department of Transportation.
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- Paradise, Town of. 1994. Town of Paradise General Plan. <https://www.townofparadise.com/planning/page/town-paradise-general-plan>.
- PlaceWorks. 2025. Noise and Vibration Assessment. Appendix F of this Draft EIR.

3.11 PUBLIC SERVICES

This section of the Draft Environmental Impact Report (EIR) evaluates the Paradise High School Expansion Project's (proposed project's) potential impacts on public services, including fire protection, police protection, schools, parks, and libraries. The analysis in this section is based in part on the existing conditions of the current Paradise High School campus (Paradise HS or campus) and the Town of Paradise.

During the Notice of Preparation (NOP) public review period, no comments were received regarding potential public service impacts associated with the proposed project. The NOP is included as Appendix A of this Draft EIR.

3.11.1 Regulatory Framework

Federal, State, and local laws; regulations; plans; or guidelines related to public services that are applicable to the proposed project are summarized in this section.

FEDERAL

National Fire Protection Association

The National Fire Protection Association Standard 1710 calls for response time targets of four minutes or less for the first arriving engine company at a fire-suppression incident and eight minutes or less for the deployment of a full crew. It also establishes Emergency Medical Services response times of four minutes or less for a first responder and eight minutes or less for a full company.

STATE

California Building Code

The California Building Code (CBC), in Part 2 of Title 24 of the California Code of Regulations, establishes the minimum state building standards. The CBC is currently updated every three years. The most recent update is the 2022 CBC, effective January 1, 2023. It is based on the 2021 International Building Code but amended to account for California conditions. The CBC is generally adopted on a jurisdiction-by-jurisdiction basis, subject to further modification based on local needs. Commercial and residential buildings are plan-checked by City building officials for compliance with the CBC Typical fire safety requirements of the CBC include installing sprinklers in all high-rise buildings; establishing fire-resistance standards for fire doors, building materials, and particular types of construction; and clearing debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas.

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California Fire Code

The California Fire Code (CFC) and Office of the State Fire Marshal provide regulations and guidance for local agencies in the development and enforcement of fire safety standards. The California Fire Code also establishes minimum requirements that would provide a reasonable degree of safety from fire, panic, and explosion. The CFC is incorporated by reference in Chapter 15.09 of the Town of Paradise Code of Ordinances.

California Code of Regulations Title 24, Part 9

Part 9 of Title 24 of the California Code of Regulations contains regulations and standards that include fire and life safety and fire inspection guidelines. Part 9 was updated in 2022 and refers to the CFC, which outline fire safety-related building standards.

The CFC regulates minimum fire safety regulations for new and existing buildings, facilities, storage, and processes, including emergency planning and preparedness, fire service features, fire protection systems, hazardous materials, fire flow requirements, and fire hydrant locations and distribution. Typical fire safety requirements include installation of sprinklers in all high-rise buildings; the establishment of fire-resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas.

California Health and Safety Code

California Health and Safety Code Sections 13000 et seq. include fire regulations for building standards (also in the CBC), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, standards for high-rise buildings and childcare facilities, and fire-suppression training.

California Occupational Safety and Health Administration

In accordance with the California Code of Regulations, Title 8, Sections 1270, *Fire Prevention*, and 6773, *Fire Protection and Fire Fighting Equipment*, the California Occupational Safety and Health Administration has established minimum standards for fire suppression and emergency medical services. The standards include, but are not limited to, guidelines on the handling of highly combustible materials, firehouse sizing requirements; restrictions on the use of compressed air; access roads; and the testing, maintenance, and use of all firefighting and emergency medical equipment.

California Mutual-Aid Agreements

The California Disaster and Civil Defense Master Mutual-Aid Agreement, as provided by the California Emergency Services Act, provide statewide mutual aid between and among local jurisdictions and the State. The statewide mutual-aid system ensures that adequate resources,

facilities, and other supports are provided to jurisdictions whenever resources prove to be inadequate for a given situation. Each jurisdiction controls its own personnel and facilities but can give and receive help whenever needed.

Mitigation Fee Act: California Government Code, Section 66000.5

The Mitigation Fee Act complements the Quimby Act by allowing separate impact and recreation facilities fees to be collected so that parks can be improved, and recreation facilities can be maintained. The act allows impact fees to be placed on non-subdivision residential developments.

Quimby Act

The Quimby Act was enacted in 1975 as an effort to promote the availability of park and open space areas in response to California's rapid urbanization and decrease in the number of parks and recreational facilities. The Quimby Act authorizes cities and counties to require developers of new residential subdivisions to dedicate land, pay in-lieu fees, or both, for the purpose of developing and maintaining park and recreational facilities to serve the new residents (CARPD 2026). The act establishes a minimum of three acres of parkland per 1,000 residents. Local parkland includes active, passive, special-use, neighborhood, and community parks, but does not include regional parks, open space, National Forest land, or regional trails.

REGIONAL

Butte County 2024 Local Hazard Mitigation Plan

The Butte County Local Hazard Mitigation Plan (LHMP) is a multi-jurisdictional plan that geographically covers the entire area within Butte County's jurisdictional boundaries and was adopted by the Butte County Board of Supervisors in March 2025. The purpose of the LHMP is to reduce or eliminate long-term risk to people and property, critical facilities and infrastructure, natural and historic and cultural resources, and other community assets from future hazard events and natural disasters.

LOCAL

Town of Paradise 1994 General Plan

The Paradise General Plan serves as the legal and policy foundation for all land use decisions within the Town of Paradise. It is a comprehensive expression of community values and long-term development goals, containing policy statements related to the distribution of future land uses across multiple elements, including land use, circulation, housing, noise, safety, open space/conservation/energy, and education and social services. Each element identifies issues, goals, objectives, policies, and specific implementation measures. The set of goals and policies

3.11 PUBLIC SERVICES

listed is not an exhaustive list of all of the General Plan policies applicable to the proposed project; rather, it is a selection relevant to the impact discussion in this chapter.

Land Use Element

Goals

LUG-4. Provide adequate public services infrastructure to meet future need.

LUG-6. Provide cost-effective public services in the community.

LUG-8. Assure that law enforcement and fire protection services are enhanced sufficiently to meet the demands of new and existing land use development.

Objectives

- **LUO-6:** Maintain a law enforcement response time for emergency police calls of no more than five minutes.
- **LUO-7:** Maintain an overall fire insurance (ISO) rating of three or better, and an emergency fire response within five minutes for 90 % of all emergency incidents within the Town Limits.

Policies

- **LUP-12.** The character of future development should be compatible with the town's service delivery abilities and shall not result in service level declines.
- **LUP-14.** Growth and land use development should be linked to the availability of public services and facilities, and to the degree of overall infrastructure and environmental constraints affecting property in the town.
- **LUP-20.** New land use development shall not cause the levels of police and fire protection to fall below the service levels established by this plan.

Safety Element

Goals

SG-1. Assure that law enforcement and fire protection services are enhanced sufficiently to meet the demands of new and existing land use development.

SG-2. Provide adequate access, including emergency vehicle access and evacuation, to all new parcels and existing parcels where feasible.

Objectives

- **SO-1:** Endeavor to maintain a law enforcement response time for emergency police class of no more than five minutes.
- **SO-2:** Maintain an overall fire insurance (ISO) rating of three or better, and an emergency fire response within five minutes of 90% of all emergency incidents within the Town Limits.

Policies

- **SP-1.** New and unmitigated land use development shall not cause the police and fire protection services emergency response times to fall below the service levels established by this plan.
- **SP-3.** Future development should be designed and constructed to take maximum advantage of known fire and crime prevention siting, orientation and building techniques.

Circulation Element

Goals

CG-4: Provide adequate access, including access for emergency vehicles and evacuation, to all new parcels and to existing parcels when feasible.

Education and Social Services Element

Goals

ESG-1: Encourage the Paradise Unified School District to continue to provide a quality education for all school children in Paradise.

ESG-2: Ensure adequate educational facilities are properly sized and located.

Objectives

- **ESO-2:** Assist the Paradise Unified School District to meet their school facility needs.

Policies

- **ESP-4.** School sites should be basically level and rectangular in shape.
- **ESP-7.** School sites must meet all state Department of Education site review requirements.

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Implementation Measures

- **ESI-1.** The Town of Paradise will continue to review proposed school sites for consistency with the General Plan.

Town of Paradise Code of Ordinances

The Paradise Code of Ordinances outlines the local laws and regulations governing land use, development, and environmental protection within the town. Among its provisions, the Code of Ordinances includes specific measures related to public services.

- **Chapter 2.20:** Establishes the Fire Department and Fire Prevention Bureau; sets forth duties to protect life and property by preventing and eliminating fire hazards and controlling fire emergencies within the Town. The Fire Prevention Bureau enforces the California Fire Code as adopted by the Town.
- **Chapter 15.09:** The California Fire Code is incorporated and enforced within Paradise, including fire prevention standards and requirements for new development and existing structures.
- **Chapter 8.58:** Requires property owners to comply with defensible space and hazard fuel management standards to reduce wildfire risk within a very high fire hazard severity zone

3.11.2 Existing Conditions

Public services for the project site and surrounding communities are provided by the Paradise Fire & Rescue Department, Paradise Police Department, Paradise Unified School District, Paradise Recreation and Park District, and the Butte County Library. A discussion of the current provisions to deliver public services to the project site and surrounding areas is provided below.

FIRE PROTECTION

Fire prevention, fire protection, and emergency medical services in the project area are provided by the Paradise Fire & Rescue Department (PFRD) with cooperative agreement with CAL FIRE. The fire station that would service the project site is PFRD Station 81 at 767 Birch Street, approximately 0.6 miles southwest of the project site. The PFRD had 1,898 total calls for service in 2024, with Station 81 responding to a total of 984 incidents (PFRD 2025).

The PFRD is an “All-Risk” department, meaning that they respond to all emergencies: fires, emergency medical services, hazardous materials, rescues, and public assists. The current minimum staffing for the PFRD is three personnel assigned to each engine. Typical engine staffing includes a captain, an engineer, and a firefighter. By contracting with CAL FIRE, the Town of Paradise is able to staff two fire stations with three-person engine companies, and one

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station with a two-person engine company. In addition to the PFRD's resources, CAL FIRE maintains their own stations in Paradise and the neighboring community of Magalia. These resources are available to assist with the Town's fire protection efforts, as necessary (PFRD 2026). The CAL FIRE Butte Unit for cooperative fire protection includes 430 CAL FIRE career firefighters and support staff, 23 fire stations, 29 fire engines, and 2 ladder trucks (PFRD 2025).

The PFRD also has a mutual-aid agreement with the Butte County Fire Department. The PFRD's service area includes all land within the town limits. Ambulance service is provided by Butte County Emergency Management Services (Butte County EMS). Both the ambulance and the fire units are staffed by paramedics. Fire hydrants are owned by the Town and maintained by the Paradise Irrigation District (Paradise 1994).

POLICE PROTECTION

The project site would be serviced by the Paradise Police Department (PPD), which is headquartered at 5595 Black Olive Drive, approximately 0.6 mile southwest of the project site.

The PPD currently has 23 employees and contains five units (Administration, Patrol, Investigations, Communication/Records, and Animal Control) (PPD 2026). The PPD has provided law enforcement for the Town of Paradise since 1980, when it took over law enforcement responsibility for the area from the Butte County Sheriff's Department. The PPD maintains a mutual-aid agreement with the Sheriff's Department (Paradise 1994).

The patrol unit is the largest unit within the department, with 14 authorized sworn patrol officers and 5 sergeants. Patrol provides 24-hour service every day of the year. Patrol personnel are the first responders to routine calls and "in-progress" crimes (PPD 2026).

SCHOOLS

The Paradise Unified School District (PUSD) provides public elementary and secondary education within the Town of Paradise (Paradise 1994). PUSD operates three elementary schools, one junior high school, one high school, and one continuation high school. Districtwide enrollment was 2,394 students during the 2024-2025 school year (CDE 2026a, 2026b).

The proposed project would serve the existing Paradise High School, which serves students in grades 9-12 and had an enrollment of 495 students in the 2024-2025 school year (CDE 2026c). Paradise High School is just north of the project site. The other nearest school to the project site is Ridgeview High School, approximately 530 feet northeast.

PARKS

Parks and recreation services are provided by the Paradise Recreation and Park District (PRPD), a special district established in 1948. The PRPD encompasses 165 square miles and operates

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and maintains 73 acres of developed park land and another 358 acres of natural open space. Park facilities include swimming pools, fishing pond, play fields, horse arena, archery range, ropes course, walking trails, picnic areas, tennis courts, playgrounds, open use areas, and a recreation center. PRPD offers a wide range of recreation programming, including after-school programming, summer camp, preschool activities, youth and adult sports, senior services, aquatics, teen programs, and numerous special events. PRPD also works directly with the Paradise Symphony, Gold Nugget Museum, Do-It-Leisure, Paradise Bowhunters, Little League, Paradise Ridge Soccer Club, and the PUSD in providing leisure services (PRPD 2026).

The PRPD receives revenues from property taxes, impact fees (Quimby fees) required by the Town of Paradise, fees for recreational programs, and grants (primarily from State Park bond funds). The PFRD operates several facilities in cooperation with PUSD and makes facilities such as the swimming pool available for use by the schools. State and federal parks and facilities, and a number of public and private trails are also used by residents of Paradise (Paradise 1994).

The nearest recreational facility to the project site is the Terry Ashe Recreation Center at 6626 Skyway, approximately 0.3 miles west.

OTHER PUBLIC SERVICES

Library service in Paradise is provided by the Butte County Library Paradise Branch. The Butte County Library offers adult programming, youth programming, and online resources (Butte County Library 2026a). The Paradise Branch Library is at 5922 Clark Road, approximately 0.35 miles southeast of the project site. The library is open Tuesday through Saturday (Butte County Library 2026b).

3.11.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, *Environmental Checklist Form*, of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact related to public services if it would:

- a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:
 - Fire protection
 - Police protection

- Schools
- Parks
- Other public facilities

METHODOLOGY

The analysis of public services impacts in this section is based on a review of the existing public services facilities on and near the project site. The analysis identifies public services that might be affected by construction and operation of the facilities that would be developed under the proposed project. Information was compiled from regional/local maps and planning documents, and online resources. CEQA focuses on whether new or expanded facilities would be required to maintain service.

3.11.4 Project Impact Analysis

-
- a) **Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives?**
-

FIRE PROTECTION

Fire prevention, fire protection, and emergency medical services in the Town of Paradise are provided by PFRD with cooperative agreement with CAL FIRE. The nearest fire station to the project site is Station 81 at 767 Birch Street, approximately one mile southwest of the project site.

Construction

During the construction phase of the proposed project, construction workers would be on-site temporarily. Construction of the proposed project would be required to comply with State and local building and fire codes to ensure on-site safety during construction, which includes standards for building and construction and requirements for emergency access, hazardous material handling, and fire protection systems. Construction plans for the proposed project would be reviewed and inspected by the PFRD and Division of State Architect (DSA) to ensure all requirements are met, such as adequate emergency access to the project site during construction. Construction of the proposed project would further implement Occupational Safety and Health Administration (OSHA) regulations to ensure that construction activities would not interfere with access and travel of emergency vehicles. Therefore, project construction would not affect fire/emergency response protection services to the extent that

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new or physically altered fire facilities would be needed to maintain acceptable service ratios, response times, or other performance objectives for fire protection services; construction-related impacts on fire protection would be **less than significant**.

Operation

The proposed project would include the development of a new practice field/football stadium, agricultural building, and parking lot. The proposed project would move some events and practices that are currently held on the existing football stadium to the proposed new stadium and practice field. Events would consist of sports games and practices, other school events, and non-school events. The proposed project would serve the existing students and staff at Paradise HS and would not increase student capacity or the number of spectators. As a result, the proposed project would not substantially increase the demand for fire protection or emergency medical services beyond current levels associated with the existing high school campus. Although the stadium and related facilities may accommodate relocated school events, these uses would occur within an existing school campus that is already served by local emergency service providers. Considering the existing firefighting resources available within the Town of Paradise and the proximity of Fire Station 81, the proposed project is not expected to adversely affect emergency response times or service capacity.

The proposed project would be designed to accommodate emergency access to the project site in accordance with the fire code and would be reviewed by the DSA. DSA review would ensure that plans, specifications, and construction comply with access, fire, and life safety design standards established by DSA and California's building codes (Title 24 of the California Code of Regulations). DSA would review fire department and emergency access roadways to ensure adequate emergency access is maintained.

In addition, the proposed stadium, agricultural building, parking areas, and site circulation features would be reviewed by the PFRD during the project's planning and permitting process to ensure compliance with applicable Fire Code and Health and Safety Code requirements. This review would confirm that adequate emergency vehicle access, fire lanes, fire hydrant placement, and fire protection infrastructure are provided. In the event of an emergency requiring additional resources beyond those available at Fire Station 81, PFRD could deploy personnel and equipment from other nearby Town stations and request assistance from other CAL FIRE stations and the Butte County Fire Department through existing mutual-aid agreement.

Because the proposed project would serve the existing student population, would comply with applicable fire protection regulations, and would be reviewed by the PFRD to ensure adequate access and fire protection infrastructure, the project would not generate a substantial increase in demand for fire protection services that would require new or physically altered fire facilities. Therefore, the proposed project would not generate a substantial increase in fire protection

facilities nor personnel in a manner that would require new or physically altered fire protection facilities, and this impact is **less than significant**.

Significance without Mitigation: Less than significant.

POLICE PROTECTION

Law enforcement services in the area are provided by the PPD. PPD is headquartered at 5595 Black Olive Drive, approximately one mile southwest of the project site.

Construction

The proposed project may cause a very slight increase in demand for police services during construction due to possible trespass, theft, and/or vandalism. During the construction phases of the proposed project, there would be a temporary increase of construction workers on-site. Construction of the proposed project would maintain emergency access and emergency egress routes during project construction. Active construction areas would be fenced during the construction phase, and construction site access would be limited to authorized personnel. Further, the storage and staging of construction equipment would occur on the project site, which would be fenced. Equipment and vehicles would be locked and only accessible by authorized personnel. Additionally, in the event of an emergency at the project site that required more resources than PPD could provide, PPD would request assistance from the Butte County Sheriff's Department. Therefore, the temporary construction of the proposed project would not materially increase the demand for police protection services. It would not result in the need for physically altered or new police facilities, which could result in environmental impacts, and impacts would be **less than significant**.

Operation

The proposed project involves constructing a new football stadium, agricultural building, and parking lot to replace the existing stadium for sports games, practices, school events, and non-school activities. The project would serve existing Paradise HS students and staff without increasing student capacity or spectator numbers. Although the stadium and related facilities may accommodate relocated school events, these uses would occur within an existing school campus that is already served by local emergency service providers. As a result, the proposed project would not substantially increase the demand for police protection beyond current levels associated with the existing high school campus.

As discussed previously, the proposed project would be reviewed by the PFRD to ensure that the proposed project is constructed under the applicable Fire Code and Health and Safety Code and have adequate circulation and access. DSA would also review and approve project design plans to ensure adequate emergency access to the project site. Although the proposed project may create an increase in the demand for police protection services compared to existing

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conditions, it would not generate an increase that would require new or physically altered police protection facilities. The proposed project would not require new or physically altered police protection facilities or routes and would not substantially increase demand for police services from the PPD. Additionally, in the event of an emergency at the project site that required more resources than PPD could provide, PPD would request assistance from the Butte County Sheriff's Department. Therefore, the proposed project would not generate a substantial increase in police protection facilities nor personnel in a manner that would require new or physically altered police protection facilities, and this impact is **less than significant**.

Significance without Mitigation: Less than significant.

Schools

School services are related to the size of the residential population, the geographic area served, and community characteristics. The proposed project would serve the existing student and staff population at Paradise HS and would not increase student population or capacity. The proposed project would not result in changes in land uses (e.g., housing) that would result in population growth or create a greater demand for school services. The proposed project would not result in a removal of a school, a reduction of school capacity, or displacement of students from existing schools. Therefore, **no impact** would occur.

Significance without Mitigation: No Impact.

Parks

Impacts to public parks and recreational facilities are generally caused by population or employment growth. The proposed project would serve the existing student and staff population at Paradise HS and would not increase population or significantly increase employment. The proposed project would not result in the increased demand for additional parks and recreation services either on-site or in the surrounding area. Therefore, physical impacts to parks and recreation from increased population growth would not occur. **No impacts** to parks would occur.

Significance without Mitigation: No impact.

Other Public Services

The proposed project would not result in impacts associated with the provision of other new or physically altered public facilities (e.g., libraries, hospitals, childcare, teen or senior centers). Physical impacts to public services are usually associated with population growth, which increases the demand for public services and facilities. The proposed project is designed to serve the existing student and staff population at Paradise HS. No new population would be

generated by the proposed uses; therefore, no increased demand on other public facilities is anticipated. **No impacts** to other public services or facilities would occur.

Significance without Mitigation: No impact.

3.11.5 Cumulative Impact Analysis

Would the project have a cumulative effect related to public services?

Fire and Police Protection

Cumulative increases of employee, student, and residential populations in the study area would result in an increase in the demand for public services, which may or may not require the construction of new public service facilities to meet cumulative demand. Fire and police agencies adapt to growth through staffing, facilities planning, and development review processes. Other projects would be required to pay impact fees. The proposed project by itself does not trigger the need for new or expanded fire facilities as no population growth is expected. The proposed project would also comply with all applicable fire code requirements and be subject to review by the PFRD and PPD, ensuring adequate emergency access and safety infrastructure. Other development projects would be required to comply with all applicable code requirements and would also be subject to review by the appropriate department. Therefore, the proposed project's contribution to cumulative impacts would not be cumulatively considerable. Cumulative impacts would be **less than significant**.

Schools

Cumulative growth in the study area would increase student populations and potentially affect school district capacity. The proposed project would not generate students as no housing is proposed. The proposed project would not contribute to a cumulatively considerable impact on schools. Cumulative impacts would be **less than significant**.

Parks

Cumulative growth in the study area would increase population and potentially affect park facilities. The proposed project would not generate a residential population that would result in an increase in demand for off-site park facilities. Therefore, the proposed project's contribution would not be cumulatively considerable. Cumulative impacts would be **less than significant**.

Other Public Services

Cumulative development within the study area may increase population and potentially affect library facilities. The proposed project itself would not result in impacts associated with the provision of other new or physically altered public facilities because the proposed project

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would not generate population growth. Therefore, the proposed project's contribution would not be cumulatively considerable. Cumulative impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

3.11.6 References

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This section of the Draft Environmental Impact Report (EIR) evaluates the potential impacts of the proposed project to affect transportation on the project site and project area. The analysis in this section is based in part on the following technical report:

- *Paradise High School Improvement Project Transportation Analysis Memo*, DJ&A, March 2026

A complete copy of this technical report is provided in Appendix G of this Draft EIR.

During the Notice of Preparation (NOP) public review period, one comment was received regarding transportation impacts associated with the proposed project. The NOP is included as Appendix A of this Draft EIR.

3.12.1 Regulatory Framework

State, regional, and local laws, regulations, plans, or guidelines that are related to transportation and applicable to the proposed project are summarized herein.

STATE

Senate Bill 743

On September 27, 2013, Senate Bill (SB) 743 was signed into law. The legislature found that with the adoption of SB 743, the State had signaled its commitment to encourage land use and transportation planning decisions and investments that reduce vehicle miles traveled (VMT) and thereby contribute to the reduction of greenhouse gas (GHG) emissions, as required by Assembly Bill (AB) 32. Additionally, AB 1358 requires local governments to plan for a balanced, multimodal transportation network that meets the needs of all users.

SB 743 started a process that fundamentally changes transportation impact analysis as part of California Environmental Quality Act (CEQA) compliance. These changes include the elimination of auto delay, level of service (LOS), and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts in many parts of California (if not statewide). As part of the new CEQA Guidelines, the new criteria “shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses” (California Public Resources Code Section 21099[b][1]). On January 20, 2016, the Governor’s Office of Planning and Research—later renamed the Governor’s Office of Land Use and Climate Innovation (LCI)—released proposed revisions to its CEQA Guidelines for the implementation of SB 743. LCI developed alternative metrics and thresholds based on VMT. The guidelines were certified by the Secretary of the Natural Resources Agency in December

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2018, and automobile delay, as described solely by LOS or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment. As of July 1, 2020, lead agencies are required to consider VMT as the metric for determining transportation impacts under CEQA. The guidance provided relative to VMT significance criteria is focused primarily on land use projects, such as residential, office, and retail uses. However, as noted in the updated CEQA Guidelines Section 15064.3, agencies are directed to choose metrics that are appropriate for their jurisdiction to evaluate the potential impacts of a project in terms of VMT.

REGIONAL

Butte County Association of Governments

Butte County Association of Governments (BCAG) is a Joint Powers Authority (JPA) between the County of Butte and the Cities of Biggs, Gridley, Oroville, Chico, and the Town of Paradise. It serves as a forum for addressing regional issues concerning transportation, the economy, community development, and the environment. The proposed project is in the Town of Paradise within the BCAG region.

Butte County 2024 Regional Transportation Plan/Sustainable Community Strategy

The Regional Transportation Plan/Sustainable Community Strategy (RTP/SCS) specifies the policies, projects, and programs necessary over a 20+ year period to maintain, manage, and improve the region's transportation system and is required to be updated every four years. The RTP/SCS is particularly focused on reducing the generation of VMT and GHG emissions; this RTP/SCS is working toward a GHG reduction target established for the region by the California Air Resources Board (CARB) of 7 percent per capita below 2005 levels by the year 2035.

LOCAL

Town of Paradise Engineering Standards

The Town of Paradise maintains Capital Projects Services Design Standards and Survey Requirements. The most current version is January 2023. The standards provide notes and details for typical Traffic Control layouts and for typical construction within the Town of Paradise Right-of-Way.

Town of Paradise 1994 General Plan

The Paradise General Plan serves as the legal and policy foundation for all land use decisions within the Town of Paradise. It is a comprehensive expression of community values and long-term development goals, containing policy statements related to the distribution of future land uses across multiple elements, including land use, circulation, housing, noise, safety, open

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space/conservation/energy, and education and social services. Each element identifies issues, goals, objectives, policies, and specific implementation measures. The set of goals and policies listed is not an exhaustive list of all of the General Plan policies applicable to the proposed project; rather, it is a selection relevant to the impact discussion in this chapter.

Circulation Element

Goals

CG-1: Support cooperative and coordinated transportation planning and development activities with federal, state, regional and local agencies in order to assure maximum coordination of effort in the Paradise region.

CG-2: Provide safe, efficient and effective traffic flow, both within Paradise and between Paradise and its environs.

CG-3: Enhance and improve pedestrian and bicycle safety and use by establishing additional linkages between areas of town.

CG-4: Provide adequate access, including access for emergency vehicles and evacuation, to all new parcels and to existing parcels when feasible.

Objectives

- **CO-5:** Plan and complete public street improvements to accommodate projected traffic during the planning period.

Policies

- **CP-1.** The town shall strive to maintain a level of service (LOS) 'D' or better as the standard for new and existing roadways in the Paradise planning area. LOS 'D' or better should be maintained on all local streets within the town limits, and LOS 'C' or better should be maintained whenever feasible.
- **CP-3.** Potential impacts upon existing residential neighborhoods shall be considered when approving extension of streets.
- **CP-4.** New land use development shall be required to mitigate its share of the circulation impacts it creates.
- **CP-10.** Safe paths for pedestrians, equestrians and bicyclists should be provided, particularly for school children and the elderly. A sidewalk and pathway development program should be instituted for selected locations and where feasible should link with the Paradise Memorial Trailway.

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Safety Element

Goals

SG-1 Provide adequate access, including emergency vehicle access and evacuation, to all new parcels and existing parcels where feasible.

Policies

- **SP-2.** Through the development review process, adequate roads shall be required to be constructed and/or improved for emergency vehicle access, particularly in high wildland fire hazard areas.

Implementation Measures

- **SI-2.** Review existing standards for roadway widths, emergency access and road and structural identification and amend as necessary.

Town of Paradise Code of Ordinances

The Paradise Code of Ordinances outlines the local laws and regulations governing land use, development, and environmental protection within the town. Among its provisions, the Code of Ordinances includes specific measures regarding transportation.

- **Section 10.36.020:** Establishes requirements and procedures whereby major employers located in the town will develop and implement programs designed to reduce the number of employee vehicles commute trips as part of a broad areawide program
- **Section 12.14.030:** Regulates excavations and/or encroachments on, over or under a public right-of-way or public service easement.
- **Section 12.14.170:** Requires that excavations and/or encroachments on, over or under a public right-of-way or public service easement are carried out in accordance with the provisions of the state of California Manual of Traffic Controls for Construction and Maintenance Work Zones as published by the State Department of Transportation.

3.12.2 Existing Conditions

PARADISE HIGH SCHOOL CIRCULATION AND ACCESS

The Paradise HS campus surrounding area is primarily residential, with pedestrian and bicycle access provided via sidewalks and bicycle lanes along the public right-of-way. An established network of pedestrian pathways provides internal circulation throughout the Paradise HS campus. An existing pick-up/drop-off zone is in front of the main administration building

entrance on Maxwell Drive. This pick-up/drop-off zone allows for one-way circulation for student pick-up/drop-off and eliminates the need for U-turn movements (DJ&A 2026).

Parking

Existing parking areas within the Paradise HS campus currently accommodate campus operations and provide designated student parking as well as staff and visitor parking. Existing parking lots on the Paradise HS campus include a 57-stall lot at the northern end of campus, a 23-stall lot in the center of campus, and a 40-stall lot at the south end of campus. Access to the Paradise HS campus parking areas is currently provided via a private driveway off Maxwell Drive (DJ&A 2026).

PEDESTRIAN AND BICYCLE ACCESS

The Paradise HS campus surrounding area is primarily residential, with pedestrian and bicycle access provided via sidewalks and bicycle lanes along the public right-of-way. The project site will be accessed via Elliot Road. Pedestrian facilities are provided via sidewalks adjacent to the project site along Elliot Road. There are no officially designated bicycle lanes on Elliot Road.

EXISTING ROADWAY NETWORK

The street network in the vicinity of the school, the existing traffic volumes, and the levels of service at the affected study area intersections are described below.

Street Network

The streets that provide access to the proposed project area include Maxwell Drive and Elliot Road. The following paragraphs provide a brief description of the characteristics of these streets.

Maxwell Drive

Maxwell Drive is a two-lane, north-south street that borders the east side of the project site and Paradise HS. Bicycle lanes are provided on both sides of Maxwell Drive, and a sidewalk is on the western side of the road. Parking is prohibited on the east side of the street. There are two painted crosswalks across Maxwell Drive that provide pedestrian access to Paradise HS.

Elliot Road

Elliot Road is a two-lane, east-west street that borders the south side of the project site. There are no designated bike lanes on Elliot Road. A sidewalk is on the north side of the street. Parking is prohibited on both sides. There are two painted crosswalks at the intersection of Elliot Road and Maxwell Drive. Elliot Road has sidewalks along the entire perimeter of the project site.

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EXISTING TRAFFIC VOLUMES

According to the BCAG, the 72-hour traffic count of Elliot Road west of the intersection with Clark Road was 9,853 trips in 2014 (BCAG 2014).

EXISTING TRANSIT FACILITIES

The Butte Regional Transit (B-Line) is Butte County's regional public transit system. Riders can use the B-Line to travel locally in Chico, Oroville, Paradise, or to travel between communities throughout Butte County (B-Line 2026). The nearest bus routes operated by B-Line run along Skyway to the west and Clark Road to the east. The nearest bus stops are at the intersection of Clark Road and Shadowbrook Road, approximately 0.4 miles southeast of the project site, and at the intersection of Skyway and Luther Drive, approximately 0.6 miles northwest from the project site.

3.12.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, *Environmental Checklist Form*, of the CEQA Guidelines states that the proposed project would result in a significant impact related to transportation if it would:

- a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, and pedestrian facilities.
- b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3(b).
- c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- d) Result in inadequate emergency access.

METHODOLOGY

Project Trip Generation

The trip generation for the proposed project was estimated using rates published in the ITE Trip Generation Manual 12th Edition. The trips are based on rates for a High School (ITE Code 550). Table 3.12-1 presents the existing trip generation forecast for Paradise HS for the weekday daily condition and AM/PM peak hours. The trip generation forecast is based on the current school enrollment of 495 students. This trip generation forecast informs the analysis of vehicle queuing

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for the pick-up/drop-off areas. No additional trips are anticipated to be generated by the proposed project.

Table 3.12-1 Project Trip Generation

Land Use and Time Period	Trip Generation Rate	Distribution		Trips		Total
		Inbound	Outbound	Inbound	Outbound	
High School – AM Peak Hour	0.52 trips/student	68%	32%	175	82	257
High School – PM Peak Hour	0.15 trips/student	48%	52%	36	38	74
High School - Daily	1.94 trips/student	50%	50%	480	480	960

Source: DJ&A 2026 (EIR Appendix G).

Site Access Analysis

The following site access elements are evaluated for conditions with proposed project implementation:

- **Driveway Sight Distance:** Intersection sight distance is evaluated for project driveways to public roadways using the latest edition of the Caltrans Highway Design Manual (HDM) or locally developed standards.
- **Driveway Length:** Primary project driveways are evaluated for sufficient length to allow vehicles to enter the project area without causing subsequent vehicles to back up into the public street system.
- **Driveway Proximity:** Driveways and local street access are evaluated to maintain a reasonable distance from an adjacent intersection and/or driveway.
- **Corner Clearance:** Project driveways are evaluated to determine if there is sufficient distance from a signalized intersection so that right-turn egress movements do not interfere with the right-turn queue at the intersection.
- A review of the adequacy of pedestrian facilities to/from the project site providing convenient and direct access for pedestrians.
- A review of the bicycle accessibility from bike routes around the project site.

3.12 TRANSPORTATION

3.12.4 Project Impact Analysis

-
- a) **Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, and pedestrian facilities?**
-

GENERAL PLAN

The Circulation and Safety Elements of the General Plan include specific goals, objectives, and policies that serve as a comprehensive framework for managing transportation infrastructure, promoting efficient mobility, and providing adequate emergency access within the Town of Paradise. The General Plan addresses various aspects of circulation, including roadways, public transit, active transportation modes, and land use planning, with the overarching aim of enhancing accessibility and safety. The goals, objectives, and policies of the General Plan that are applicable to the proposed project are summarized in Section 3.12.1, *Regulatory Framework*.

As discussed in Section 3.12.2, *Existing Conditions*, pedestrian access at the project site is provided via sidewalks adjacent to the project site along Elliot Road and painted crosswalks across Maxwell Drive and at the intersection of Elliot Road and Maxwell Drive. B-Line bus stops are within one mile of the project site. The proposed agricultural building would be exclusively used by the Paradise HS agricultural program and would serve the existing students at the high school, and the proposed project would move events that are currently held on the existing football stadium to the proposed new stadium and practice field. The proposed project would not result in an increase in student capacity that would substantially decrease the performance or safety of a nearby facility.

Access to the project site would be provided via a driveway off Elliot Road. The proposed agricultural building would be accessed via a gravel driveway. The proposed parking lot and football stadium/practice fields would be accessed via a 24-foot-wide driveway off Elliot Road. The proposed driveways would meet the Town of Paradise design standards for both driveway width and corner clearance. In addition, the gravel driveway serving the proposed Agriculture Building would comply with Town of Paradise Public Works engineering standards and specifications. A pedestrian path would provide access to the football stadium/practice fields and the rest of the Paradise HS campus to the north. The proposed improvements are consistent with the goals, objectives, and policies presented in the General Plan, providing adequate access and pedestrian safety.

The project would not adversely affect the performance of any roadway, transit, or non-motorized (pedestrian and bicycle) transportation facilities. Based on the traffic analysis, the discussion of non-motorized transportation and transit, and a review of the Town of Paradise

3.12 TRANSPORTATION

General Plan, the proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

2024 BCAG RTP/SCS CONSISTENCY

The proposed project would remain consistent with the 2024 BCAG RTP/SCS as it would not increase student enrollment, vehicle trips, or alter regional travel demand patterns, and it would not alter existing public right-of-way roadway and circulation infrastructure. The proposed project would not interfere with Paradise's ability to continue to implement multimodal transportation strategies, including maintaining safe and efficient roadway operations, supporting pedestrian connectivity, and accommodating planned regional transportation improvements consistent with RTP/SCS goals and policies. Therefore, the proposed project would not conflict with the 2024 BCAG RTP/SCS. Impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

b) **Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3 (b)?**

Vehicle delays and LOS have historically been used as the basis for determining the significance of traffic impacts as standard practice in CEQA documents. On September 27, 2013, SB 743 was signed into law, starting a process that fundamentally changed transportation impact analyses as part of CEQA compliance. SB 743 eliminated auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as the sole basis for determining significant impacts under CEQA. As part of the current CEQA Guidelines, the criteria "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code [PRC] Section 21099(b)(1)). Pursuant to SB 743, the California Natural Resources Agency adopted revisions to the CEQA Guidelines on December 28, 2018, to implement SB 743. CEQA Guidelines Section 15064.3 describes how transportation impacts are to be analyzed after SB 743. Under the CEQA Guidelines, metrics related to VMT were required beginning July 1, 2020, to evaluate the significance of transportation impacts under CEQA for development projects, land use plans, and transportation infrastructure projects. State courts ruled that under the PRC Section 21099(b)(2), "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment" under CEQA, except for roadway capacity projects.

The proposed project would support existing programs and students at Paradise HS. The proposed stadium would host games and events that are already occurring at Paradise HS. The proposed project does not change the student enrollment number for the school and would not result in an increase in the number of vehicle trips generated by the project. The proposed

3.12 TRANSPORTATION

project would not conflict with or be inconsistent with CEQA Guidelines Section 15064.3(b) and would have a **less-than-significant** VMT impact.

Significance without Mitigation: Less than significant.

c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The proposed project would not create or increase any design hazards or incompatible uses. Vehicle access to the existing Paradise HS campus parking areas will continue to be via a private drive off Maxwell Drive. Access to the project site would be provided via a driveway off Elliot Road. The proposed agricultural building would be accessed via a gravel driveway. The proposed parking lot and football stadium/practice fields would be accessed via a 24-foot-wide driveway off Elliot Road. The proposed driveways would meet the Town of Paradise design standards for both driveway width and corner clearance. In addition, the gravel driveway serving the proposed Agriculture Building would comply with Town of Paradise Public Works engineering standards and specifications. All driveway designs would meet the Town of Paradise Design public works and engineering regulations, Butte County Street Improvement Standards, and Caltrans standards for intersection sight distance, as appropriate. Sight lines along Elliot Drive are adequate given the alignment of the roadway. No other changes to traffic control measures or lane configurations in the vicinity of the project would be necessary due to the proposed project (DJ&A 2026).

A pedestrian path would provide access to the football stadium/practice fields and the rest of the Paradise HS campus to the north. This would ensure convenient access while maintaining safe separation between vehicle and pedestrian circulation on the site. Within the Paradise HS campus, paved and gravel walkways would connect the new parking lot, classrooms, administrative buildings, multipurpose buildings, and playfields. The proposed parking lot configuration provides efficient and safe circulation for vehicles (DJ&A 2026). The proposed project would not add an additional pick-up/drop-off zone. No changes to the existing Paradise HS campus circulation or parking areas are proposed as part of the project. The existing student pick-up and drop-off zone allows vehicles to enter from Maxwell Drive and exit back onto the same roadway. The proposed project would not increase the anticipated vehicle queue for pick-up/drop-off activities.

The proposed project would be compatible with the design and operation of a high school, and the proposed project would not result in an increase in student enrollment. The proposed project would not substantially increase hazards due to a geometric design feature or incompatible uses. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant.

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d) Would the project result in inadequate emergency access?

The proposed project would be required to maintain emergency access to the project site. Vehicular access to the project site would be provided at Elliot Road. The existing access and circulation features at Paradise HS, including the driveways, parking lots, on-site roadways, and fire lanes, would accommodate emergency ingress and egress by fire trucks, police units, and ambulance/paramedic vehicles. The proposed project would be designed to accommodate emergency access to the proposed agricultural building and stadium/practice field. The proposed project would be designed in accordance with all applicable DSA and Paradise Fire & Rescue Department design standards for emergency access (e.g., minimum lane width and turning radius). In addition, the existing student pick-up and drop-off zone allows vehicles to enter from Maxwell Drive and exit back onto the same roadway. The internal drive aisle accommodates school buses, passenger vehicles, and emergency-response vehicles. The proposed project would not increase the anticipated vehicle queue for pick-up/drop-off activities. Implementation of the proposed project would not require major road closures or otherwise affect the functionality of Elliot Road or Maxwell Drive as a public safety access route. Therefore, the proposed project would not result in inadequate emergency access. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant.

3.12.5 Cumulative Impact Analysis

Would the project have a cumulative effect related to transportation?

As defined in Section 15130 of the State CEQA Guidelines, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects within the cumulative impact area for transportation. There are currently no other major improvement projects in the vicinity that would result in a contribution to cumulatively significant effects.

As described previously, the proposed project would comply with applicable plans, ordinances, and policies that guide circulation. No significant cumulative impacts are anticipated in regard to Town circulation policies with the implementation of the proposed project. Similar to the proposed project, each cumulative project would be expected to be consistent with existing programs, plans, ordinances, and policies that address its jurisdiction's circulation system (such as the Town's Circulation Element). No significant cumulative impacts are anticipated to which both the proposed project and the cumulative projects would contribute in regard to Town circulation policies or standards adopted to protect the environment and support multimodal transportation options.

3.12 TRANSPORTATION

The proposed project would result in no cumulative impacts related to transportation, as it would not generate a significant increase in VMT. The project is consistent with applicable regional transportation plans and would not generate traffic volumes that would cumulatively affect surrounding roadway operations. The proposed project would not result in an increase in the number of vehicle trips generated by the project as it would change the student enrollment number for the school. Therefore, the proposed project's contribution to VMT impacts would not be cumulatively considerable.

A potentially cumulative impact may occur if the proposed project would combine with a cumulative project to create or substantially increase hazards due to a geometric design feature or incompatible uses. All proposed project driveway designs would meet the Town of Paradise Design public works and engineering regulations, Butte County Street Improvement Standards, and Caltrans standards for intersection sight distance, as appropriate. No other changes to traffic-control measures or lane configurations in the vicinity of the project would be necessary due to the proposed project. Additionally, the proposed project's features are typical of a high school and would not introduce incompatible uses. Therefore, the proposed project's contribution to geometric design feature impacts would not be cumulatively considerable.

Construction-related activities could adversely impact emergency access in adjacent roadways when combined with other cumulative projects. However, not all cumulative projects would be constructed at the same time, and no cumulative projects immediately adjacent to the project site are proposed at this time. Each construction project would be required to prepare and implement site-specific construction worksite staging and construction plans to reduce potential impacts to emergency access and potentially incorporate mitigation measures. Therefore, the proposed project's contribution to emergency access impacts would not be cumulatively considerable. Thus, the project would not in combination with other projects result in significant cumulative transportation impacts and the impact would be **less than significant**.

Significance without Mitigation: Less than significant.

3.12.6 References

- BCAG (Butte County Association of Governments). 2014. Traffic Count Data.
https://www.townofparadise.com/sites/default/files/fileattachments/public_works/_engineering/page/5811/traffic_counts_2013-14_web.pdf.
- BCAG. 2024. Butte County 2024 *Regional Transportation Plan/Sustainable Communities Strategy*. <https://www.bcag.org/2024-rtp-scs-update>.

3.12 TRANSPORTATION

B-Line (Butte Regional Transit). 2026, March 27 (accessed). About B-Line.
<https://www.blinetransit.com/about-b-line>.

DJ&A. 2026. Paradise High School Improvement Project Transportation Analysis Memo.
Appendix G of this Draft EIR.

3.12 TRANSPORTATION

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3.13 TRIBAL CULTURAL RESOURCES

This section of the Draft Environmental Impact Report (DEIR) evaluates the potential for implementation of Paradise High School Expansion Project's (proposed project) to impact tribal cultural resources (TCR). This section discusses state laws and regulations protecting resources, along with the existing cultural resource conditions on and near the project site. TCRs include landscapes, sacred places, or objects with a cultural value to a California Native American tribe. Potential impacts to other cultural resources (i.e., historic, archaeological, and disturbance of human remains) are evaluated in Section 3.5, *Cultural Resources*. The analysis is also based in part on the following technical report.

- *Historical/Archaeological Resources Survey Report: Paradise High School Expansion Project, Town of Paradise, Butte County, California*, CRM Tech, February 2026

A complete copy of this technical report is provided in Appendix D of this DEIR.

The Paradise Unified School District (District) invited California Native American tribes that are traditionally and culturally affiliated with the project site to consult on the proposed project via email. Three tribes were contacted on March 24, 2026, and a response was received from the Berry Creek Rancheria on March 31, 2026. Copies of the responses received from the tribal consultation are included in Appendix D of this DEIR.

During the Notice of Preparation (NOP) public review period, one comment was received from the Native American Heritage Commission (NAHC) regarding tribal cultural resource impacts associated with the proposed project. The NOP is included as Appendix A of this DEIR.

3.13.1 Regulatory Framework

Federal, State, and local laws, regulations, plans, or guidelines related to tribal cultural resources and potentially applicable to the proposed project are summarized below.

Federal

NATIONAL REGISTER OF HISTORIC PLACES

The National Register of Historic Places (NRHP) recognizes properties that are significant at the national, state, and/or local levels and includes districts, sites, buildings, structures, and objects that are significant in American history, architecture, archaeology, engineering, and culture.

Properties are nominated to the NRHP by the State Historic Preservation Officer of the state in which the property is located, by the Federal Preservation Officer for properties under federal

3.13 TRIBAL CULTURAL RESOURCES

ownership or control, or by the Tribal Historic Preservation Officer if a property is on tribal lands.

The criteria for listing in the NRHP follow the standards for determining if properties, sites, districts, structures, or landscapes of potential significance are eligible for nomination. In addition to meeting any or all of the following criteria, properties nominated must also possess integrity of location, design, setting, feeling, workmanship, association, and materials:

- Associated with events that have made a significant contribution to the broad patterns of history.
- Associated with the lives of persons significant in our past.
- Embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; or represent a significant and distinguishable entity whose components may lack individual distinction.
- Yield, or may be likely to yield, information important in prehistory or history.

NATIONAL HISTORIC PRESERVATION ACT

The National Historic Preservation Act supplements the provisions of the Antiquities Act of 1906 and established laws for historic resources to “preserve important historic, cultural, and natural aspects of our national heritage, and to maintain, wherever possible, an environment that supports diversity and a variety of individual choice.” The law makes it illegal to destroy, excavate, or remove from federal or Indian lands any archaeological resources without a permit from the land manager. Regulations for the ultimate disposition of materials recovered as a result of permitted activities state that archaeological resources excavated on public lands remain the property of the United States. Archaeological resources excavated from Indian lands remain the property of the Indian or Indian tribe having rights of ownership over such resources.

ARCHAEOLOGICAL RESOURCES PROTECTION ACT

The Archaeological Resources Protection Act (US Code, Title 16, Sections 470aa–mm) became law on October 31, 1979, and has been amended four times. It regulates the protection of archaeological resources and sites that are on federal and Native American lands.

NATIVE AMERICAN GRAVES PROTECTION AND REPATRIATION ACT

The Native American Graves Protection and Repatriation Act (US Code, Title 25, Sections 3001 et seq.) is a federal law passed in 1990 that provides a process for museums and federal agencies to return certain Native American cultural items—such as human remains, funerary objects, sacred objects, or objects of cultural patrimony—to lineal descendants and culturally affiliated Indian tribes.

State

ASSEMBLY BILL 52

The Native American Historic Resource Protection Act (Assembly Bill [AB] 52) took effect July 1, 2015, and incorporates tribal consultation and analysis of impacts to TCRs into the CEQA process. It requires TCRs to be analyzed like any other CEQA topic and establishes a consultation process for lead agencies and California tribes. Projects that require a notice of preparation of an EIR or notice of intent to adopt a negative declaration or mitigated negative declaration are subject to AB 52. A significant impact on a TCR is considered a significant environmental impact and requires feasible mitigation measures.

Tribal cultural resources must have certain characteristics:

1. Sites, features, places, cultural landscapes (must be geographically defined), sacred places, and objects with cultural value to a California Native American tribe that are either included or determined to be eligible for inclusion in the California Register of Historic Resources or included in a local register of historical resources. (Public Resources Code [PRC] Section 21074(a)(1))
2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. (PRC Section 21074[a][2])

The first category requires that the tribal cultural resource qualify as a historical resource according to PRC Section 5024.1. The second category gives the lead agency discretion to qualify that resource—under the conditions that it supports its determination with substantial evidence and consider the resource’s significance to a California tribe. Following is a brief outline of the process, paraphrased from PRC Sections 21080.3.1 and 21080.3.2.

- A California Native American tribe asks agencies in the geographic area with which it is traditionally and culturally affiliated to be notified about projects. Tribes must ask in writing.
- Within 14 days of deciding to undertake a project or determining that a project application is complete, the lead agency must provide formal written notification to all tribes who have requested it.
- A tribe must respond within 30 days of receiving the notification if it wishes to engage in consultation.
- The lead agency must initiate consultation within 30 days of receiving the request from the tribe.

3.13 TRIBAL CULTURAL RESOURCES

- Consultation concludes when both parties have agreed on measures to mitigate or avoid a significant effect to a tribal cultural resource, OR a party, after a reasonable effort in good faith, decides that mutual agreement cannot be reached.
- Regardless of the outcome of consultation, the CEQA document must disclose significant impacts on tribal cultural resources and discuss feasible alternatives or mitigation that avoid or lessen the impact.

PRC Section 21082.3(c)(1) states that any information, including but not limited to the location, description, and use of the tribal cultural resources, that is submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public without the prior consent of the tribe that provided the information. If the lead agency publishes any information submitted by a California Native American tribe during the consultation or environmental review process, that information shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. However, confidentiality does not apply to data or information that are, or become, publicly available; are already in lawful possession of the project applicant before the provision of the information by the California Native American tribe; are independently developed by the project applicant or the project applicant's agents; or are lawfully obtained by the project applicant from a third party that is not the lead agency, a California Native American tribe, or another public agency.

CALIFORNIA PUBLIC RESOURCES CODE

Archaeological resources are protected pursuant to a wide variety of state policies and regulations enumerated under the California Public Resources Code (PRC). In addition, cultural resources are recognized as a nonrenewable resource and therefore receive protection under the California PRC and CEQA.

Sections 5097.9 to 5097.991

PRC Sections 5097.9 to 5097.991 provide protection to Native American historical and cultural resources and sacred sites and identify the powers and duties of the Native American Heritage Commission (NAHC). These sections also require notification to descendants of discoveries of Native American human remains and provide for treatment and disposition of human remains and associated grave goods.

Sections 21073 and 21074

PRC Sections 21073 and 21074 define California Native American tribe and tribal cultural resources, respectively. PRC Section 21073 defines a “California Native American tribe” as a Native American tribe located in California that is on the contact list maintained by the NAHC.

TCRs are defined in Section 21074 as sites, features, places, cultural landscapes (geographically defined in terms of the size and scope), sacred places, and objects with cultural value to a California Native American tribe that are either included in or determined to be eligible for inclusion in the CRHR, or are included in a local register of historical resources as defined in subdivision (k) of Section 5020.1, or are a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1.

CALIFORNIA HEALTH AND SAFETY CODE

California Health and Safety Code Section 7050.5 requires that if human remains are discovered on a project site, disturbance of the site shall halt and remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative. If the coroner determines that the remains are not subject to his or her authority and recognizes or has reason to believe the human remains are those of Native American, he or she shall contact, by telephone within 24 hours, the NAHC.

CALIFORNIA REGISTER OF HISTORICAL RESOURCES

The California Register of Historic Resources (CRHR) is the state version of the NRHR program. It was enacted in 1992 and became official on January 1, 1993. The CRHR was established to serve as an authoritative guide to the state’s significant historical and archaeological resources. Resources that may be eligible for listing include buildings, sites, structures, objects, and historic districts. According to subsection (c) of PRC Section 5024.1, a resource may be listed as a historical resource in the CRHR if it meets any of the four NRHR criteria.

CALIFORNIA STATE HISTORICAL LANDMARKS

California Historical Landmarks (CHLs) are buildings, structures, sites, or places that have been determined to have statewide historical significance by meeting at least one of the criteria listed below:

- The first, last, only, or most significant of its type in the state or within a large geographic region (Northern, Central, or Southern California).

3.13 TRIBAL CULTURAL RESOURCES

- Associated with an individual or group having a profound influence on the history of California.
- A prototype of, or an outstanding example of, a period, style, architectural movement, or construction or is one of the more notable works or the best-surviving work in a region of a pioneer architect, designer, or master builder.

The resource also must have written consent of the property owner, be recommended by the State Historical Resources Commission, and be officially designated by the Director of California State Parks.

CALIFORNIA STATE POINTS OF HISTORICAL INTEREST

California Points of Historical Interest (CPHI) are sites, buildings, features, or events that are of local (city or county) significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other value. Points of Historical Interest designated after December 1997 and recommended by the State Historical Resources Commission are also listed in the CRHR. No historical resource may be designated as both a Landmark and a Point. If a Point is subsequently granted status as a Landmark, the Point designation will be retired. To be eligible for designation as a Point of Historical Interest, a resource must meet at least one of the following criteria:

- The first, last, only, or most significant of its type within the local geographic region (City or County).
- Associated with an individual or group having a profound influence on the history of the local area.
- A prototype of, or an outstanding example of, a period, style, architectural movement, or construction or is one of the more notable works or the best surviving work in the local region of a pioneer architect, designer, or master builder.

Regional

BUTTE COUNTY GENERAL PLAN 2040

Butte County seeks to identify and protect cultural resources that are significant to Butte County's history through the following goals and policies (Butte County 2023):

Goal COS-15: Preserve important cultural resources.

- **COS-P15.1.** Historic and cultural resources management shall be coordinated with nearby jurisdictions, including the five incorporated municipalities, the Lassen and Plumas National Forests, other planning and regulatory agencies, and local tribes.

3.13 TRIBAL CULTURAL RESOURCES

Goal COS-16: Ensure that new development does not adversely impact cultural resources.

- **COS-P16.1.** Areas found during construction to contain significant historic or prehistoric archaeological artifacts shall be examined by a qualified consulting archaeologist or historian for appropriate protection and preservation. Historic or prehistoric artifacts found during construction shall be examined by a qualified consulting archaeologist or historian to determine their significance and develop appropriate protection and preservation measures.
- **COS-P16.2.** Any archaeological or paleontological resources on a development project site shall be either preserved in their sites or adequately documented as a condition of removal. When a development project has sufficient flexibility, avoidance and preservation of the resource shall be the primary mitigation measure.

Goal COS-17: Respect Native American culture and planning concerns.

- **COS-P17.1.** The County shall maintain collaborative relationships with local Native American tribal representatives to facilitate consultation in the review of future projects that have the potential to impact tribal cultural resources.
- **COS-P17.2.** County staff shall participate in a dialog with local Native American tribes to collaborate on tribal land use plans.
- **COS-P17.3.** The County shall consult with local Native American tribes on wildfire hazard mitigation, including hazard tree removal, and wildfire recovery, including road impacts and resource management in burn scar areas.
- **COS-P17.4.** Impacts to the traditional Native American landscape shall be considered during California Environmental Quality Act or National Environmental Protection Act review of development proposals.
- **COS-P17.5.** Human remains discovered during implementation of public and private development projects shall be treated with dignity and respect. Such treatment shall fully comply with the federal Native American Graves Protection and Repatriation Act and other appropriate laws.
- **COS-P17.6.** If human remains are located during any ground disturbing activity, work shall stop until the County Coroner has been contacted, and, if the human remains are determined to be of Native American origin, the NAHC and most likely descendant have been consulted.

3.13 TRIBAL CULTURAL RESOURCES

- **COS-P17.7.** Consistent with state, local, and tribal intergovernmental consultation requirements, such as SB 18 and AB 52, the County shall consult with Native American tribes that may be interested in proposed new development projects and land use policy changes.

3.13.2 Existing Conditions

Refer to Chapter 3.5, *Cultural Resources*, of this DEIR and the Historical and Archaeological Report by CRM Tech (Appendix D), which provides a comprehensive overview of the town's historical and cultural context, including known archaeological and paleontological resources, and historic-era structures.

TRIBAL CONSULTATION

In compliance with the requirements set forth in AB 52, the District provided formal notification of the proposed project and served an invitation for consultation to three tribes that are on the District's request for notification list on March 24, 2026. These letters were emailed and sent via certified mail to:

- Berry Creek Rancheria of Maidu Indians of California
- Enterprise Rancheria-Estom Yumeka Maidu Tribe
- Mechoopda Indian Tribe of Chico Rancheria

On March 31, 2026, a response email was received from the Berry Creek Rancheria of Maidu Indians of California. The District began consultation via email with the Berry Creek Rancheria on April 1, 2026. Consultation with the tribe concluded on June 2, 2026. No recommended mitigation measures were provided for the proposed project (see Appendix D).

3.13.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, "Environmental Checklist Form," of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact related to recreation if it would:

- a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

3.13 TRIBAL CULTURAL RESOURCES

- i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k).
- ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

METHODOLOGY

To determine the presence or absence of TCRs on the project site, a review was conducted of the Town of Paradise General Plan and General Plan Environmental Impact Report as well as relevant federal, state, and local databases, including the National Register of Historic Places and the California Register of Historical Resources. These sources were evaluated to assess whether the project site has been previously identified as containing TCRs.

3.13 TRIBAL CULTURAL RESOURCES

3.13.4 Project Impact Analysis

-
- a) **Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**
- i) **Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?**
 - ii) **A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?**
-

Part i

As discussed under Threshold 3.5(a), the project site is not listed or eligible for listing in the California Register of Historical Resources, National Register of Historic Places, California State Historical Landmarks, or Points of Historical Interest or in a local register of historical resources (NPS 2026a, 2026b; OHP 2026a, 2026b). The project site does not meet any of the historic resource criteria and does not meet the definition of a historic resource pursuant to CEQA. The project site does not contain any identified TCR listed on any of the registers of historic resources. Due to the developed nature of the project site and surrounding area, there would be no impacts to a resource listed on the California Register of Historical Resources, National Register of Historic Places, California State Historical Landmarks or Points of Historical Interest, or in a local register of historical resources. Therefore, the proposed project would not impact a known tribal cultural resource that is listed on any of the registers of historic resources. Therefore, there would be **no impact** to tribal cultural resources that are listed or eligible for listing on federal, state, or local registers.

Part ii

The project site has been developed prior and has been subject to prior grading excavation activities. A records search did not find any recorded cultural resource sites or isolates in the immediate vicinity of the project site. During a field survey conducted on the project site, no features or artifacts dating to the prehistoric or early historic period were encountered and no

3.13 TRIBAL CULTURAL RESOURCES

evidence of any substantial artifact deposits was noted. Additionally, a NAHC Sacred Lands File search (SLF) was conducted and yielded a negative result, which indicates that there are no known Native American cultural resources, including scared sites, within the project area, demonstrating a low potential for intact buried tribal cultural resources to be found within the project site (Appendix D). There is not a known potential for the proposed project to disturb subsurface deposits possessing traditional or cultural significance to Native American or other descendant communities.

Assembly Bill 52 (AB 52) tribal consultation was conducted as part of the proposed project. AB 52 requires meaningful consultation with California Native American tribes on potential impacts to tribal cultural resources, as defined in PRC Section 21074. Tribal cultural resources are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either eligible or listed in the California Register of Historical Resources or local register of historical resources.

Pursuant to AB 52, the District invited three tribes to consult based on the District's AB 52 list—the Berry Creek Rancheria of Maidu Indians of California, the Enterprise Rancheria-Estom Yumeka Maidu Tribe, and the Mechoopda Indian Tribe of Chico Rancheria. Pursuant to AB 52, the District sent tribal consultation letters via email on March 24, 2026, inviting the tribes for consultation, and one tribe requested to consult with the District regarding the proposed project. On March 31, 2026, the District received a request for consultation from the Berry Creek Rancheria of Maidu Indians of California regarding the proposed project. Tribal consultation with the Berry Creek Rancheria of Maidu Indians of California, pursuant to AB 52, concluded on June 2, 2026, for the proposed project.

The tribe did not identify a tribal cultural resource within the project site or request avoidance, monitoring, or other mitigation measures to be incorporated into the DEIR that address the potential inadvertent discovery of tribal cultural resources or to minimize the potential impacts to tribal cultural resources. Therefore, based on the results of tribal consultation and the information currently available, there is no evidence supporting a significant impact to a tribal cultural resource. Implementation of the proposed project would not result in a substantial adverse change to a tribal cultural resource, and impacts would be **less than significant**. Nevertheless, the proposed project would implement Mitigation Measure CUL-1, which would require that if any evidence of cultural resources is discovered, all work within the vicinity of the find will stop until a qualified archaeological consultant can assess the find and make recommendations, reducing impacts to cultural resources to a less than significant level.

Significance Without Mitigation: Less than significant

3.13 TRIBAL CULTURAL RESOURCES

3.13.5 Cumulative Impact Analysis

Would the project have a cumulative effect related to tribal cultural resources?

As defined in Section 15130 of the State CEQA Guidelines, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects within the cumulative impact area for tribal cultural resources. The study area for the assessment of cumulative impacts related to tribal cultural resources is the Paradise HS campus. There are currently no other projects proposed to occur within the campus.

Development of the proposed project and related projects have the potential to encounter and potentially degrade tribal cultural resources and archeological resources. However, similar to the proposed project, each related project would be expected to comply with PRC Section 15064.5, which addresses accidental discoveries of archaeological sites and resources, including tribal cultural resources; perform site-specific archeological analyses; implement mitigation measures if needed; and comply with other applicable regulatory compliance measures. The proposed project would not result in an adverse change in the significance of a tribal cultural resource. The project site does not contain known archeological resources or human remains. No other projects are currently planned for the project site.

Overall, the proposed project would not introduce new uses to the campus and would not substantially alter the campus beyond compared to existing conditions. Therefore, the proposed project would not have a cumulative effect related to tribal cultural resources, and this impact is **less than significant**.

Significance with Mitigation: Less than significant.

3.13.6 References

NPS (National Park Service). 2026a, March 23 (accessed). National Register of Historic Places. <https://www.nps.gov/subjects/nationalregister/database-research.htm#table>.

NPS. 2026b, March 23 (accessed). National Register of Historic Places: Map. <https://www.nps.gov/maps/full.html?mapId=7ad17cc9-b808-4ff8-a2f9-a99909164466>.

OHP (California Office of Historic Preservation). 2026a, March 23 (accessed). California Historical Landmarks by County. https://ohp.parks.ca.gov/?page_id=21445.

OHP. 2026b, March 23 (accessed) California Historical Resources. <https://ohp.parks.ca.gov/ListedResources/?view=county&criteria=30>.

3.14 UTILITIES AND SERVICE SYSTEMS

This section of the Draft Environmental Impact Report (DEIR) describes the regulatory framework and existing conditions on the project site related to utilities and service systems, and the potential impacts of the project on water supply and distribution; wastewater (sewage) treatment and collection; solid waste collection and disposal; stormwater infrastructure; and electricity, natural gas, and telecommunications utilities. Potential impacts to hydrology (e.g., flooding) and water quality are provided in Section 3.9, *Hydrology and Water Quality*. Storm drainage, though discussed below, is also addressed in Section 3.9.

During the Notice of Preparation (NOP) public review period, no comments were received regarding potential utilities and service systems impacts associated with the proposed project. The NOP is included as Appendix A of this DEIR.

3.14.1 Regulatory Framework

Federal, State, and local laws, regulations, plans, or guidelines that are related to utilities and service systems and applicable to the proposed project are summarized in this section.

FEDERAL

Clean Water Act

The Clean Water Act (CWA) regulates the discharge of pollutants into watersheds throughout the nation. Under the CWA, the United States Environmental Protection Agency (EPA) implements pollution control programs, sets wastewater standards, and makes it unlawful to discharge pollutants from a point source into any navigable waters without obtaining a permit. Point sources include any conveyances, such as pipes and human-made drainage channels, from which pollutants may be discharged.

National Pollutant Discharge Elimination System

The National Pollutant Discharge Elimination System (NPDES) permit program was established in the CWA to regulate municipal and industrial discharges to surface waters of the United States. Federal NPDES permit regulations have been established for broad categories of discharges, including point-source municipal waste discharges and nonpoint-source stormwater runoff. Wastewater discharge is regulated under the NPDES permit program for direct discharges into receiving waters and by the National Pretreatment Program for indirect discharges to a sewage treatment plant.

3.14 UTILITIES AND SERVICE SYSTEMS

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act of 1976 (Title 40 of the Code of Federal Regulations), Part 258, contains regulations for municipal solid waste landfills and requires states to implement their own permitting programs incorporating the federal landfill criteria. The federal regulations address the location, operation, design (liners, leachate collection, run-off control, etc.), groundwater monitoring, and closure of landfills.

STATE

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act (Water Code Sections 13000 et seq.) was passed in 1969 and amended in 2013. It is the basic water quality control law for California. Under this act, the State Water Resources Control Board (SWRCB) has authority over State water rights and water quality policy. The act divided the state into nine regional basins, each under the jurisdiction of a Regional Water Quality Control Board (RWQCB), to oversee water quality on a day-to-day basis at the local and regional levels. RWQCBs engage in various water quality functions in their respective regions and regulate all pollutant or nuisance discharges that may affect either surface water or groundwater.

California Building Code: CALGreen

The California Building Standards Commission adopted the nation's first green building standards in July 2008, the California Green Building Standards Code, also known as CALGreen. CALGreen applies to the planning, design, operation, construction, use, and occupancy of every newly constructed building or structure in California. The code establishes planning and design standards for sustainable site development, including water efficiency and water conservation measures that typically reduce water consumption by 20 percent. CALGreen is updated every three years to allow for consideration and possible incorporation of new low-flow plumbing fixtures and water-efficient appliances. The mandatory provisions of CALGreen became effective January 1, 2011, and the latest version, the 2022 California Green Building Standards Code, became effective on January 1, 2023. The building-efficiency standards are enforced through the local building permit process. CALGreen Section 5.408, Construction Waste Reduction Disposal and Recycling, requires a minimum of 65 percent of nonhazardous construction and demolition debris to be recycled or salvaged. Applicants must prepare and submit to the jurisdiction a construction and demolition recycling and waste reduction plan. The plan must:

- Identify the materials to be diverted from disposal by recycling, reuse on the project, or salvage for future use or sale.
- Specify if materials will be sorted on-site or mixed for transportation to a diversion facility.
- Identify the diversion facility where the material collected will be taken.

3.14 UTILITIES AND SERVICE SYSTEMS

- Supply weight tags for the entire period of the project for compliance review.

General Waste Discharge Requirement

On May 2, 2006, the SWRCB adopted a General Waste Discharge Requirement (Order No. 2006-0003) and a monitoring and reporting program (Order No. WQ-2013-0058-EXEC) for all publicly owned sanitary sewer collection systems in California with more than one mile of sewer pipes. The order provides a consistent statewide approach to reducing sanitary sewer overflows (SSO) by requiring public sewer system operators to take all feasible steps to control the volume of waste discharged into the system, to prevent sanitary sewer waste from entering the storm sewer system, and to develop a Sewer System Management Plan (SSMP). The General Waste Discharge Requirement also requires that SSOs be reported to the SWRCB using an online reporting system. The SWRCB has delegated authority to the nine RWQCBs to enforce these requirements within their regions.

The SSMP evaluates existing sewer collection systems and provides a framework for minimizing the frequency and impact of SSOs. The SSMP includes an overflow emergency response plan; a fats, oil, and grease control program; scheduled inspections and condition assessment; design and construction standards; capacity assessment and management; and a monitoring program.

California Integrated Waste Management Act of 1989

In 1989, the State Legislature passed Assembly Bill (AB) 939, the Integrated Waste Management Act, which required cities and county to prepare, adopt, and submit a “source reduction and recycling element” to the county that characterizes waste disposal, source reduction, recycling, composting, solid waste capacity, education/public information, funding, special waste, and household hazardous waste to ensure sufficient solid waste disposal capacity. AB 939 also mandated that by January 1, 2000, each city must achieve a waste diversion goal of 50 percent through source reduction, recycling, and composting activities. In October 2011, the legislature passed AB 341, which increased the goal of diversion of waste from landfills from 50 to 75 percent by 2020. AB 341 requires mandatory commercial waste recycling. AB 1826 requires that businesses and multifamily residences of five or more units that generate a specified amount of organic waste to arrange recycling services for organic waste.

California Global Warming Solutions Act

AB 32 (Chapter 488, Statutes of 2006), the California Global Warming Solutions Act, established mandatory recycling as one of the measures to reduce GHG emissions adopted in the Scoping Plan by the California Air Resources Board.

California Solid Waste Reuse and Recycling Access Act of 1991

AB 1327 (California Solid Waste Reuse and Recycling Access Act of 1991) requires local agencies to adopt ordinances mandating the use of recyclable materials in development projects.

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Sustainable Groundwater Management Act

The Sustainable Groundwater Management Act (SGMA) was enacted in 2014 and aims to ensure the long-term sustainability of groundwater resources by requiring local agencies to develop and implement groundwater sustainability plans (GSP) for high- and medium-priority basins. These plans aim to achieve sustainable groundwater management by balancing the amount of water pumped out with the amount recharged.

LOCAL

Paradise Stormwater Management Program

Authorized under the Clean Water Act and implemented through EPA stormwater regulations beginning in 1990, the NPDES Stormwater Management Program is a comprehensive national program for addressing non-agricultural sources of stormwater pollution that adversely affect the quality of our nation's waters. The program uses the NPDES to require cities to implement controls designed to prevent harmful pollutants from being washed by runoff into local water bodies. The Town of Paradise, under the NPDES Small MS4 Phase II permit, is actively pursuing these controls.

Paradise Storm Drainage Master Plan

The purpose of this storm drainage master plan (SDMP) was to establish a prioritized project improvement list aimed at reducing the risk of flooding within the Town of Paradise. This SDMP provides the Town with a framework to evaluate storm-drainage-related recovery efforts from the Camp Fire that destroyed most of the Town in November of 2018. This SDMP evaluates and redefines the limits of expected storm drainage through the Town.

Paradise Irrigation District Urban Water Management Plan

The purpose of Paradise Irrigation District's 2020 Urban Water Management Plan (UWMP) is to inform the public and state agencies of the Paradise Irrigation District's water supply availability, exposure to droughts, conservation efforts, and plans for future supply. UWMPs are prepared by California's urban water suppliers to support their long-term resource planning and ensure adequate water supplies are available to meet existing and future water demands.

Paradise Post-construction Standards Plan

The Post-construction Standards Plan provides project proponents and municipal plan checkers with information on how to meet the State Water Board's requirements for mitigating the negative impact of increases in storm water runoff caused by new development and redevelopment. This document accomplishes this goal through the incorporation of low impact development (LID) standards and hydromodification management techniques. LID mitigates excessive runoff by the use of control measures that utilize evapotranspiration, infiltration,

3.14 UTILITIES AND SERVICE SYSTEMS

capture/reuse, and biotreatment to mimic the runoff of a natural environment. Hydromodification techniques are used to design development sites so that post-construction runoff flow rates do not exceed those of the pre-construction conditions.

Town of Paradise 1994 General Plan

The Paradise General Plan serves as the legal and policy foundation for all land use decisions in the Town of Paradise. It is a comprehensive expression of community values and long-term development goals, containing policy statements related to the distribution of future land uses across multiple elements, including land use, circulation, housing, noise, safety, open space/conservation/energy, and education and social services. Each element identifies issues, goals, objectives, policies, and specific implementation measures. The set of goals and policies listed is not an exhaustive list of all of the General Plan policies applicable to the proposed project; rather, it is a selection relevant to the impact discussion in this chapter.

Land Use Element

- **LUG-7.** Fully implement the onsite wastewater management district.
- **LUO-5.** Assure that an adequate water supply exists prior to approval of development in the Paradise planning area.
- **LUP-13.** The town shall attempt to assure that the rate and character of growth is commensurate with, or does not exceed the current levels of public services, and shall attempt to assure that municipal services can be provided to areas planned for annexation and development.

Safety Element

- **SP-9.** The town should assure that increased runoff resulting from additional coverage of surface area on developing properties does not adversely affect surrounding properties, roads, or stream courses.
- **SP-12.** All new development should comply with the procedures and regulations of the Master Storm Drain Study and Facilities Plan.

Open Space/Conservation/Energy Element

- **OCEG-7.** Actively promote water conservation and recycling efforts.
- **OCEP-22.** The undergrounding of existing utility lines shall be encouraged.
- **OCEP-35.** Active community involvement in solid waste management and recycling should be encouraged.

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- **OCEI-26.** Support the water conservation standards and programs of the Paradise Irrigation District, the Del Oro Water Company and the Lime Saddle Community Services District.
- **OCEG-10.** Maximize Paradise's energy efficiency.
- **OCEG-10.** Significantly reduce townwide energy consumption.

Education and Social Services Element

- **ESP-6:** School sites should have on a timely basis access to all utilities and services, including sewer, water, gas, electricity, and drainage.

Town of Paradise Code of Ordinances

- **Chapter 8.16:** Regulates refuse collection services, recycling requirements, and adequate solid waste facilities for new development.
- **Section 8.56.050:** Assigns responsibility for administering the town's stormwater quality and runoff control program.
- **Section 8.56.060:** Requires development to comply with a MS4 Permit from the Central Valley Regional Water Quality Control Board.
- **Title 13:** Regulates excavation, encroachment permits, and restoration requirements for installation or relocation of underground utilities (including electric and gas lines) within public rights-of-way.
- **Chapter 13.04:** Supports orderly development within the Town of Paradise while protecting groundwater and surface water quality across its hydrologic basins. Implements prior planning efforts, including the Montgomery Phase I report and establishes onsite wastewater management zone, along with technical guidance from the onsite wastewater treatment manual. Establishes local regulations for sewage effluent disposal to safeguard public health and safety in compliance with California Health and Safety Code requirements.
- **Chapter 13.12:** Regulates new water service connections, meter installation, and capacity requirements, ensuring adequate water supply for development.
- **Title 18:** Establishes requirements for solid waste storage, collection, and disposal to protect public health and safety.

3.14 UTILITIES AND SERVICE SYSTEMS

3.14.2 Existing Conditions

WATER

As stated in DEIR Section 3.9, *Hydrology and Water Quality*, water is provided to the Town of Paradise, including Paradise HS, by the Paradise Irrigation District (PID). PID obtains its water from two reservoirs on Little Butte Creek, the Magalia Reservoir and Paradise Reservoir. Together, the reservoir system has a maximum storage capacity of 12,293-acre feet (PID 2026). Water is transported to the Town through a single transmission line. Distribution lines, booster pumps, and surface-level tank reservoirs serve various pressure zones throughout the town. The calculated per capita water usage has varied since 1980 from 245 to 289 gallons per day. There are also approximately 300 privately owned wells in Paradise that supply water for irrigation and domestic uses (Paradise 1994). Paradise HS is served by existing municipal infrastructure and does not rely on on-site groundwater wells or independent water supply systems. The PID projects that the total demand for potable and non-potable water for the service area would be 4,356 acre-feet in 2030 (PID 2023).

WASTEWATER

The Town of Paradise, including Paradise HS, does not have a central sewer system and relies on individual septic systems for wastewater disposal. Wastewater treatment facilities in the town consist of individual privately owned septic tanks and leach fields, together with several engineered subsurface disposal systems serving commercial and institutional facilities.

The Paradise Sewer Project is a public infrastructure initiative undertaken by the Town to develop a centralized wastewater collection, conveyance, and treatment system to replace reliance on individual septic systems. The project consists of installing underground sewer pipelines (collection system), pump stations, and related facilities to transport wastewater to a newly constructed wastewater treatment plant designed to meet state regulatory standards. The objectives are to protect groundwater quality, improve public health and environmental conditions, and support orderly community redevelopment and economic growth, particularly in the aftermath of the 2018 Camp Fire. Implementation is planned in multiple phases over several years, including planning, environmental review, design, and construction, with buildout anticipated through the late 2020s and beyond (Paradise 2026). The proposed project would install a new septic tank for the proposed agricultural building and would also connect to sewer services when they become available to the project site.

STORMWATER INFRASTRUCTURE

Formal storm drain systems are limited in Paradise, and roadside ditches are the primary means of collecting and conveying runoff (Paradise 1994). Paradise's existing drainage system includes inlets, manholes, pipes, basins, streams, and roadside ditches. Paradise has approximately

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124,963 linear feet of stormwater pipes (Paradise 2022). Stormwater on the project site is drained to existing storm drains on Elliot Road and Maxwell Drive.

ENERGY INFRASTRUCTURE

Electricity and Natural Gas

Electricity to the project site would be provided by the Pacific Gas and Electric Company (PG&E) via existing infrastructure in the immediate area of the project site. PG&E maintains regional transmission, distribution, and substation facilities designed to accommodate incremental increases in demand from infill development and redevelopment projects. Electrical service to the project site would be provided through PG&E's existing distribution system (PG&E 2023). PG&E also provides natural gas services to the Town of Paradise.

SOLID WASTE

Paradise has a franchise agreement with Northern Recycling and Waste Services for refuse collection and recycling and vegetative waste diversion services (Paradise 2017). In 2019, the Town of Paradise disposed of approximately 1,005,242 tons of solid waste at eight solid waste facilities. However, the Reworld Stanislaus, Inc. (aka Covanta Stanislaus, Inc.) solid waste facility was closed in 2025. The amount of solid waste permitted per day, the remaining capacity for each of the solid waste facilities, and the amount of solid waste coming from the Town of Paradise can be seen in Table 3.14-1, *Solid Waste Facilities*.

Table 3-14-1 Solid Waste Facilities

Solid Waste Facility Name	Solid Waste Permitted Per Day (in tons)	Remaining Capacity (in tons)	Solid Waste from Paradise (in tons in 2019)
Anderson Landfill, Inc.	1,850	9,480,000	252
Covanta Stanislaus, Inc. (closed)	--	--	3
Foothill Sanitary Landfill	1,500	125,000,000	1
Neal Road Recycling and Waste Facility	1,500	20,847,970	292,883
Potrero Hills Landfill	4,330	13,872,000	69
Recology Hay Road	2,400	30,433,000	129
Recology Ostrom Road LF Inc.	3,000	32,225,000	711,904
West Central Landfill	700	2,687,673	1

Sources: CalRecycle 2025a, 2025b.

TELECOMMUNICATION UTILITIES

Various private services, including Charter Spectrum, AT&T, DIRECTV, Xfinity, and Suddenlink, provide telecommunication services to the town, including the project site.

3.14.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, “Environmental Checklist Form,” of the California Environmental Quality Act (CEQA) Guidelines states that the proposed project would result in a significant impact related to public services if it would:

- a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.
- b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.
- c) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments.
- d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.
- e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

Methodology

To evaluate the potential impacts of the proposed project on utilities and service systems, relevant information was reviewed from the Town of Paradise General Plan, the General Plan EIR, and data from utility providers serving the project site. These sources were analyzed to determine whether implementation of the proposed project would affect existing utility infrastructure and service capacity.

3.14 UTILITIES AND SERVICE SYSTEMS

3.14.4 Project Impact Analysis

-
- a) **Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**
-

WATER

The proposed project consists of the construction of a new agricultural building, stadium/practice field, and parking lot. The proposed project would require the installation of a water line connection for the stadium/practice field; however, the proposed project would not increase school capacity. The Paradise Irrigation District (PID) currently provides water to the Paradise HS campus and will continue to supply the project site via existing water mains. While the current infrastructure will remain in use, the project requires new service connections to support the proposed agricultural building and the stadium/practice field. Further details regarding these utility requirements are provided in Section 3.14(b). PID obtains its water supplies from two reservoirs on Little Butte Creek, the Magalia Reservoir and Paradise Reservoir. Together, the reservoir system has a maximum storage capacity of 12,293 acre-feet (PID 2026). The PID will have adequate water supplies to meet water demands in its service area through 2040 during normal, dry, and multiple dry years (PID 2023). The proposed project would not require the relocation or construction of new or expanded water treatment facilities. Therefore, there is sufficient water capacity to serve the project site, and the proposed project would not require the construction of new or expanded water facilities that could cause significant impacts. Therefore, impacts would be **less than significant**.

WASTEWATER

The Town of Paradise does not have a central sewer system and relies on individual septic systems for wastewater disposal. The project is currently served by a septic system. Currently, four on-site wastewater treatment systems exist on the project site, and each of these systems services different areas on the project site. These wastewater systems consist of septic tanks, and leach fields (Appendix E). The proposed project would install an additional septic tank on-site for the proposed agricultural building. Wastewater generated from the agricultural building would consist of wash water produced during the hosing and cleaning of the stalls, which would not substantially increase wastewater flows. Because the proposed septic tank would be constructed entirely on-site, would only serve the new agricultural building, and would not require the expansion or relocation of off-site wastewater infrastructure or centralized treatment facilities, construction of the system would not result in significant environmental effects.

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The proposed project would also connect to sewer services when they become available to the project site. The proposed project would not increase overall District enrollment and thus would not expand total treatment demands within the Town. The proposed project would generate only minimal wastewater flows associated with typical school operational uses, which would be well within the design capacity of the existing septic system. The system would continue to operate in compliance with applicable county and state health regulations, ensuring adequate treatment and disposal of wastewater without adverse effects on soil or groundwater resources.

To develop a sustainable, locally managed wastewater treatment facility (WWTF), the Town of Paradise collaborated with the Central Valley Regional Water Quality Control Board (CVRWQCB). Following the Town Council's August 2025 approval of a revised project—featuring a hybrid gravity/low-pressure collection system, aerated lagoon treatment, and percolation/evaporation ponds — the Town is currently preparing a Subsequent Program Environmental Impact Report (PEIR) to reflect the selected site and design. Design activities for the facility and collection system commenced in early 2026. Paradise HS is located within the project's full buildout area; the first phase of service is slated for determination in 2026, with design completion anticipated in 2027, construction in 2029, and full service commencing in 2030 (Paradise 2026).

The proposed project would not require the relocation or construction of new or expanded wastewater treatment facilities outside the sewer facilities being planned under the Paradise Sewer Project. Therefore, this impact is **less than significant**.

STORMWATER INFRASTRUCTURE

The proposed project would result in an increase in impervious surfaces compared to existing conditions. However, the proposed project also includes the addition of new pervious surfaces in the form of landscaping and the proposed practice field. Stormwater on the project site that does not percolate into the ground would be directed to the existing storm drain in the public right-of-way on Elliott Road. As discussed in Section 3.9(a), construction and operation of the proposed project would be required to implement BMPs that would control the amount and quality of stormwater exiting the project site and would adhere to the requirements of the Town of Paradise Code of Ordinances Chapter 8.56, which regulates illicit discharge by prohibiting non-stormwater discharges, requiring implementation of source control measures, and mandating that site operators minimize pollutants in runoff to the maximum extent practicable. Thus, the proposed project would not exceed the capacity of existing stormwater drainage systems. The proposed project would not significantly increase or change the stormwater volume, rate, or pattern. The proposed project would not exceed the capacity of existing stormwater drainage systems and would not create substantial additional sources of polluted runoff. Therefore, this impact is **less than significant**.

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ENERGY INFRASTRUCTURE

Electricity

Electrical needs for the project site would be provided by PG&E via existing infrastructure in the immediate area of the project site. Although the new stadium component of the proposed project would result in slightly higher electricity demand compared to existing conditions, the increase would be negligible compared to PG&E's capacity. Electricity use would only increase during sporting events, which are intermittent and already take place on the Paradise HS campus. All utility connections to the proposed project would be required to comply with applicable federal, state, and local regulations related to electric power supply. Implementation of the proposed project would not result in major construction related to electrical power facilities that could cause significant environmental impacts. Therefore, impacts would be **less than significant**.

Natural Gas

Natural gas needs in the project area are also provided by PG&E, but the proposed project, including the agricultural building, would not require natural gas. Because the project would not include any natural gas-fired equipment, connections, or infrastructure, it would not increase demand on the existing natural gas distribution system or require the installation of new pipelines, service extensions, or related facilities. In addition, construction activities would be limited in duration and would not involve the use of substantial natural gas resources. The proposed project would not require PG&E to obtain new or expanded natural gas supplies. Therefore, this impact is **less than significant**.

OTHER UTILITIES

There are existing telecommunications facilities and services in the immediate area to which the proposed project can connect, if necessary. The proposed project would not create additional demand for telecommunications facilities demand. The proposed project would not require off-site construction or relocation of utilities; therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant.

-
- b) Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?**
-

The PID would provide potable water to the project site. PID obtains its water supplies from two reservoirs on Little Butte Creek, the Magalia Reservoir and Paradise Reservoir. Together, the reservoir system has a maximum storage capacity of 12,293-acre feet (PID 2026). The proposed

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project may result in an increase of water during operation of the proposed agricultural building. However, the amount of water required for animal care and maintenance of the agricultural facilities would be small compared to overall campus water demand and would be supplied through the existing PID water system.

The use of the project site for athletic practices and games would relocate these existing events from the Paradise HS campus; events that are currently held on the existing football stadium would be moved to the proposed new stadium. Thus, the proposed project's water demand would be similar compared to existing conditions because the events at the project site are existing events that already occur on campus, and potential increased water demand would only occur during events/games, which are intermittent. The proposed project would not increase student or staff capacity at Paradise HS. Therefore, the increases in water consumption from the proposed project would be nominal.

The PID will have adequate water supplies to meet water demands in its service area through 2040 during normal, dry, and multiple dry years (PID 2023). Additionally, the proposed project's landscaping would be reviewed by DSA for compliance with landscape design standards for water-efficient, fire-resistant landscaping in the town and to maintain the rural, wooded atmosphere of the community. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant.

c) Would the project result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

As substantiated in Section 3.14(a), the proposed project would not increase overall District enrollment and would not expand total treatment demands within the town. The proposed project would be served by an existing septic system and would connect to sewer services when they become available to the project site. The proposed project would install one additional septic tank and associated leach field to serve the proposed agricultural building. The new septic system would be sized to accommodate limited wash water generated from routine cleaning of animal stalls and would not substantially increase wastewater flows. The proposed project would not require the relocation or construction of new or expanded wastewater treatment facilities outside the sewer facilities being planned under the Paradise Sewer Project. Therefore, impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

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d) Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

During construction, the proposed project would haul approximately 1,668 tons of debris off-site. The proposed project would comply with CALGreen Section 5.408, Construction Waste Reduction, Disposal, and Recycling, which requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse. The solid waste generated by the proposed project's operational activities would be negligible because the proposed project would not increase the campus's enrollment capacity. Sporting and other events would be infrequent and seasonal during the school year; they already take place on the Paradise HS campus and would be relocated to the proposed stadium/practice field. The proposed project would not increase student or staff enrollment and would result in a negligible increase in solid waste.

As seen in Table 3.14-1, there is adequate landfill capacity in the region for project-generated solid waste, and project development would not require new or expanded landfills. The proposed project would comply with the required regulation pertaining to construction and demolition waste and would not adversely impact landfill capacity or impair attainment of solid waste reduction goals. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant.

e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

The proposed project is required to comply with federal, state, and local statutes and regulations related to solid waste and would continue this practice. Project-related construction and operation phases would be implemented in accordance with all applicable federal, state, and local laws and regulations governing solid waste disposal. Therefore, this impact is **less than significant**.

Significance without Mitigation: Less than significant.

3.14.5 Cumulative Impact Analysis

Would the project have a cumulative effect related to utilities and service systems?

As defined in Section 15130 of the State CEQA Guidelines, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects within the cumulative impact area for utilities and

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services. There are currently no other major improvement projects in the vicinity that would result in a contribution to cumulatively significant effects.

Water

The PID will have adequate water supplies to meet water demands in its service area through 2040 during normal, dry, and multiple dry years (PID 2023). The proposed project would not require the relocation or construction of new or expanded water treatment facilities. Therefore, there is sufficient water capacity to serve the project site, and the proposed project would not require the construction of new or expanded water facilities that could cause significant impacts. Cumulative development within the Paradise area is accounted for in long-term water planning documents, including the PID's water supply assessments, which incorporate projected growth and demand scenarios. These planning efforts ensure that sufficient supply and infrastructure capacity are available to accommodate anticipated development without requiring substantial new or expanded facilities that could result in environmental impacts. As such, the incremental demand from the proposed project, when combined with other cumulative projects, would not exceed available water supplies or infrastructure capacity. Therefore, the proposed project's contribution to water supply infrastructure impacts would not be cumulatively considerable. This impact is **less than significant**.

Significance without Mitigation: Less than significant.

Wastewater

The Town of Paradise does not have a central sewer system and relies on individual septic systems for wastewater disposal. The proposed project would be served by an existing septic system used by Paradise HS and would add an additional tank for the proposed agricultural building only. The proposed project would not increase overall District enrollment and thus would not expand total treatment demands within the Town. The proposed project would not require the relocation or construction of new or expanded wastewater treatment facilities. Cumulative development in Paradise would similarly rely on individual septic systems designed and permitted based on site-specific conditions. Regulatory oversight by local and state agencies requires that each system be adequately sized and maintained to prevent system failure or environmental contamination. The incremental wastewater contribution from the proposed project, in combination with other cumulative projects, would not exceed the capacity of on-site wastewater treatment systems or result in the need for new or expanded centralized wastewater infrastructure. Therefore, the proposed project's contribution to wastewater infrastructure impacts would not be cumulatively considerable. This impact is **less than significant**.

Significance without Mitigation: Less than significant.

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Stormwater Infrastructure

Construction and operation of the proposed project would be required to implement BMPs that would control the amount and quality of stormwater exiting the project site and would adhere to the requirements of the Town of Paradise Code of Ordinances Chapter 8.56, which regulates illicit discharge by prohibiting non-stormwater discharges, requiring implementation of source control measures, and mandating that site operators minimize pollutants in runoff to the maximum extent practicable. Thus, the proposed project would not exceed the capacity of existing stormwater drainage systems. The proposed project would not exceed the capacity of existing stormwater drainage systems and would not create substantial additional sources of polluted runoff.

Cumulative development within Paradise is anticipated to occur in accordance with adopted plans and regulatory requirements that include stormwater management standards designed to prevent system overcapacity and degradation of water quality. While other projects may incrementally increase impervious surfaces in the area, each project would be required to implement similar BMPs and comply with municipal and state regulations, thereby limiting the potential for combined impacts to exceed the capacity of existing drainage infrastructure. The proposed project's incremental contribution to stormwater runoff would be minor and would not combine with other projects to result in significant adverse effects on stormwater conveyance systems or water quality. Therefore, the proposed project's contribution to stormwater infrastructure impacts would not be cumulatively considerable. This impact is **less than significant**.

Significance without Mitigation: Less than significant.

Energy Infrastructure

Electrical needs to the project site and any cumulative projects would be provided by PG&E via existing infrastructure in the Paradise area. Implementation of the proposed project would not result in major construction related to electrical power facilities that could cause significant environmental impacts. The proposed project would involve only nominal increases in electricity demand associated with school operations, which would be well within the capacity of the existing local distribution system. Additionally, electrical infrastructure serving the area is designed to accommodate planned growth, and any incremental increases in demand from the proposed project in combination with cumulative development would be addressed through routine system maintenance, upgrades, and load management by the utility provider, rather than requiring substantial new generation or transmission facilities.

PG&E provides natural gas services to the Town of Paradise. The proposed project would not include any natural gas-fired equipment, connections, or infrastructure, it would not increase demand on the existing natural gas distribution system or require the installation of new pipelines, service extensions, or related facilities. Because the proposed project would not

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utilize natural gas, it would not contribute to cumulative demand for natural gas resources or infrastructure, and it would not combine with other projects to necessitate expansion of the natural gas system. Therefore, the proposed project's contribution to energy infrastructure impacts would not be cumulatively considerable. This impact is **less than significant**.

Significance without Mitigation: Less than significant.

Other Utilities

There are existing telecommunications facilities and services in the Paradise area for the proposed project and any cumulative projects to connect to, if necessary. The proposed project would not require additional telecommunications facilities demand. The proposed project would not require off-site construction or relocation of utilities. Furthermore, cumulative development in the Paradise area is anticipated to occur within the scope of existing land use plans and infrastructure planning efforts, which account for projected growth and associated utility needs. The combined demand from the proposed project and related cumulative projects would not exceed the capacity of existing telecommunications systems or trigger the need for major new or expanded facilities that could result in significant environmental effects. Therefore, the proposed project's contribution to utility impacts would not be cumulatively considerable. This impact is **less than significant**.

Significance without Mitigation: Less than significant.

3.14.6 References

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3.15 WILDFIRE

This section of the Draft Environmental Impact Report (DEIR) evaluates the potential impacts of the proposed project to exacerbate wildfires on the project site and project area. The evaluation related to wildfire is based on Fire Hazard Severity Zones (FHSZ) mapped by the California Department of Forestry and Fire Protection (CAL FIRE).

During the Notice of Preparation (NOP) public review period, no comments were received regarding potential wildfire impacts associated with the proposed project. The NOP is included as Appendix A of this DEIR.

3.15.1 Regulatory Framework

Federal, state, and local laws, regulations, plans, or guidelines that are related to wildfire and applicable to the proposed project are summarized below.

FEDERAL

The Disaster Mitigation Act of 2000

The Disaster Mitigation Act of 2000 requires a state-level mitigation plan as a condition of disaster assistance. There are two different levels of state disaster plans: “Standard” and “Enhanced.” States that develop an approved Enhanced State Plan can increase the amount of funding available through the Hazard Mitigation Grant Program. The act also established new requirements for local mitigation plans.

National Fire Plan

The National Fire Plan was developed in August 2000, following a historic wildfire season. Its intent is to establish plans for active response to severe wildfires and their impacts on communities while ensuring sufficient firefighting capacity. The plan addresses firefighting, rehabilitation, hazardous fuels reduction, community assistance, and accountability.

National Fire Protection Association Standards

National Fire Protection Association (NFPA) codes, standards, recommended practices, and guides are developed through a consensus standards development process approved by the American National Standards Institute. NFPA standards are recommended (advisory) guidelines in fire protection but are not laws or “codes” unless adopted or referenced as such by the California Fire Code (CFC) or local fire agency. Specific standards applicable to wildland fire hazards include, but are not limited to:

- **NFPA 1141**, Fire Protection Infrastructure for Land Development in Wildlands

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- **NFPA 1142**, Water Supplies for Suburban and Rural Fire Fighting
- **NFPA 1143**, Wildland Fire Management
- **NFPA 1144**, Reducing Structure Ignition Hazards from Wildland Fire
- **NFPA 1710**, Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations

STATE

Division of State Architect

The Division of the State Architect (DSA) provides design and construction oversight for K-12 schools, community colleges, and various other state-owned and state-leased facilities in California to ensure that they comply with all structural, accessibility, and fire and life safety codes. Construction plans for public school construction and certain other state-funded building projects are reviewed to ensure that plans, specifications, and construction comply with California's codes (Title 24 of the California Code of Regulations). DSA's plan review and construction oversight focus on new construction and alteration projects for K-12 schools and community college districts. DSA's plan review ensures the project's compliance with code requirements related to structural safety; fire and life safety; accessibility; and sustainability. DSA reviews construction projects under its jurisdiction for building code compliance.

California Board of Forestry and Fire Safe Regulations

The Board of Forestry maintains the State's Fire Safe Regulations (Title 14 of the California Code of Regulations (CCR), Sections 1270–1276.04). The Fire Safe Regulations establish minimum wildfire protection standards in conjunction with building, construction, and development in the State Responsibility Area (SRA) and the Very High Fire Hazard Severity Zones, as defined in Public Resources Code Section 51177(i). This includes requirements for road width, surface treatments, grade, radius, turnarounds, turnouts, structures, driveways, and gate entrances that are intended to ensure safe access for emergency wildland fire equipment and civilian evacuation.

California Fire and Building Code

The CFC is Chapter 9 of CCR Title 24. It establishes the minimum requirements consistent with nationally recognized good practices to safeguard public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations. It is the primary means for authorizing and enforcing procedures and mechanisms to ensure the safe handling and storage of any substance that may pose a threat to public health and safety. The CFC regulates the use, handling, and storage requirements for hazardous materials at fixed facilities. The CFC and California Building Code

(CBC) use a hazard classification system to determine what protective measures are required to protect fire and life safety. These measures may include construction standards, separations from property lines, and specialized equipment. To ensure that these safety measures are met, the CFC employs a permit system based on hazard classification. The provisions of this code apply to the construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure or any appurtenances connected or attached to such building structures throughout California.

The CBC (24 CCR Part 2) Chapter 7A addresses materials and construction methods for exterior wildfire exposure. The CFC addresses fire-resistances-rated construction (Chapter 7), fire-related interior finishes (Chapter 8), fire protection systems (Chapter 9), and fire-related means of egress, including fire apparatus access road width requirements (Chapter 10). CFC Section 4906 also contains existing regulations for vegetation and fuel management to maintain clearances around structures. These requirements establish minimum standards to protect buildings in FHSZs of SRAs and wildland-urban interface (WUI) areas. The code includes provisions for ignition-resistant construction standards for new buildings.

California Fire Plan

The Strategic Fire Plan for California is the State's road map for reducing the risk of wildfire. The most recent version of the plan was finalized in 2024 and directs each CAL FIRE unit to revise and update its locally specific Fire Management Plan (CAL FIRE 2024a). These plans assess the fire situation in each of the 21 operational units and 6 contract counties. These plans address wildfire protection areas, initial attack success, assets and infrastructure at risk, pre-fire management strategies, and accountability.

California Office of Emergency Services

The California Office of Emergency Services (CalOES) prepares the State of California Multi-Hazard Mitigation Plan (SHMP) (CalOES 2023). The SHMP identifies hazard risks and includes a vulnerability analysis and a hazard mitigation strategy. The SHMP is federally required under the Disaster Mitigation Act of 2000 for the State to receive federal funding for disaster assistance.

State Emergency Plan

The foundation of California's emergency planning and response is a statewide mutual-aid system designed to ensure that adequate resources, facilities, and other support are provided to jurisdictions whenever their own resources prove inadequate to cope with a given situation.

The California Disaster and Civil Defense Master Mutual Aid Agreement (California Government Code Sections 8555–8561) requires signatories to the agreement to prepare operational plans to use within their jurisdiction and outside their area. These plans include fire and non-fire

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emergencies related to natural, technological, and war contingencies. The State of California, all State agencies, all political subdivisions, and all fire districts signed this agreement in 1950.

Section 8568 of the California Government Code, the California Emergency Services Act, states that “the State Emergency Plan shall be in effect in each political subdivision of the state, and the governing body of each political subdivision shall take such action as may be necessary to carry out the provisions thereof.” The act provides the basic authorities for conducting emergency operations following the proclamations of emergencies by the governor or appropriate local authority, such as a city manager. The provisions of the act are further reflected and expanded on by appropriate local emergency ordinances. The act further describes the function and operations of government at all levels during extraordinary emergencies, including war.

All local emergency plans are extensions of the State of California Emergency Plan. The State Emergency Plan conforms to the requirements of California’s Standardized Emergency Management System (SEMS), which is the system required by Government Code Section 8607(a) for managing emergencies involving multiple jurisdictions and agencies (CalOES 2024a). The SEMS incorporates the functions and principles of the Incident Command System, the Master Mutual Aid Agreement, existing mutual-aid systems, the operational area concept, and multi-agency or inter-agency coordination. Local governments must use SEMS to be eligible for funding of their response-related personnel costs under state disaster assistance programs. The SEMS consists of five organizational levels that are activated as necessary, including field response, local government, operational area, region, and state. CalOES divides the state into several mutual-aid regions. The Town of Paradise is in Butte County in Mutual Aid Region III, which also includes Colusa, Glenn, Lassen, Modoc, Plumas, Sierra, Siskiyou, Shasta, Sutter, Tehama, Trinity, and Yuba counties (CalOES 2024b).

Government Code Sections 65302 and 65302.5, Senate Bill 1241 (Kehoe) of 2012

Senate Bill (SB) 1241 requires cities and counties to address fire risk in SRAs and FHSZs in the Safety Element of their General Plans. The bill also amended the California Environmental Quality Act (CEQA) to direct amendments to the CEQA Guidelines Appendix G Environmental Checklist to include questions related to fire hazard impacts for projects in or near lands classified as SRAs and Very High FHSZs. In adopting these CEQA Guidelines amendments, the Office of Land Use and Climate Innovation (LCI) recognized that low-density, leapfrog development may create higher wildfire risks than high-density, infill development.

California Public Resources Code: State Responsibility Area

The California Public Resources Code (PRC) requires the designation of SRAs, which are identified based on cover, beneficial water uses, probable erosion damage, and fire risks and hazards. The financial responsibility for preventing and suppressing fires in an SRA lies primarily on the state. Fire protection in areas outside SRAs are the responsibility of local or federal

jurisdictions and are referred to as local responsibility areas and federal responsibility areas, respectively.

California Wildfire and Forest Resilience Action Plan

The Wildfire and Forest Resilience Action Plan is designed to strategically accelerate efforts to restore the health and resilience of California forests, grasslands, and natural places; improve the fire safety of communities; and sustain the economic vitality of rural forested areas. The Action Plan is a roadmap for implementing the Agreement for Shared Stewardship of California's Forest and Rangelands with the US Forest Service and for aligning the state's efforts with other federal, local, tribal, regional and private organizations (California 2021).

REGIONAL

Community Wildfire Protection Plan

The 2025 Butte County Community Wildfire Protection Plan (CWPP) emphasizes strategies to mitigate wildfire risks, reduce hazards, and protect human life and property. It offers a thorough assessment of wildfire risks, hazards, and protection needs across Butte County, uniting various stakeholders involved in wildfire pre-planning, management, and suppression. By identifying gaps and potential planning deficiencies, the plan establishes a framework for future planning and the implementation of mitigation projects and other measures.

Butte County's CWPP serves a dual role as both the countywide CWPP and the Unit Fire Plan for the CAL FIRE Butte Unit. This combined approach, developed over a decade ago, streamlines planning and ensures alignment with the State Board of Forestry's 2018 Strategic Fire Plan for California and CAL FIRE's Statewide Strategic Plan, promoting a unified vision of community safety across local, state, and federal levels (Butte County 2025).

Fire Risk Reduction Community List

The Fire Risk Reduction Community List is "...a list of local agencies located in a state responsibility area or a very high fire hazard severity zone...that meet best practices for local fire planning" (PRC 4290.1). The list is developed and maintained by the Board of Forestry (BOF), with the first iteration beginning July 1, 2022, and updated every two years thereafter. Butte County is listed on the 2024 iteration of the Fire Risk Reduction Community List.

Butte County Local Hazard Mitigation Plan

This Butte County Local Hazard Mitigation Plan (LHMP) is a multi-jurisdictional plan that geographically covers the entire area within Butte County's jurisdictional boundaries. The purpose of the 2024 Butte County LHMP Update and hazard mitigation planning process is to reduce or eliminate long-term risk to people and property, critical facilities and infrastructure,

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natural and historic and cultural resources, and other community assets from future hazard events and natural disasters.

In the Butte County LHMP, the Town of Paradise has an annex that supplements the information in the base plan document. The Paradise Annex provides additional information specific to Paradise, with a focus on providing additional details on the planning process, risk assessment, and mitigation strategy for this jurisdiction.

LOCAL

Town of Paradise Emergency Operations Plan

The Town of Paradise Emergency Operations Plan provides an all-hazards approach to emergency preparedness and response, incorporating a “whole community” lens that is inclusive and unique to the Town’s size, population, and relationships with neighboring jurisdictions and/or agencies. The basic plan is the principal guide for the Town’s response to and management of real or potential emergencies and disasters in its boundaries (Paradise 2022).

Town of Paradise Transportation Master Plan

The Town of Paradise Transportation Master Plan evaluates the Town’s transportation network to serve traffic evacuation needs, assuming an “all at once” event similar to the Camp Fire evacuation. The recommendations build on lessons learned from the Camp Fire and recent evacuations to address pinch points, improve the backbone network, identify new connections, facilitate operations during an evacuation, and coordinate with regional partners and public safety responders.

Paradise Emergency Fire Zones and Assembly Points

The Town of Paradise created a map of emergency fire zones and assembly points in the town. Five assembly points were identified—Paradise Alliance Church, Paradise Auditorium, Magalia Community Church, Pine Ridge School, and Old Mill Site. The primary evacuation routes in Paradise are along Skyway, Clark Road, Neal Road, and Pentz Road, as shown in the Paradise Emergency Fire Zones and Assembly Points map (Paradise 2020).

Wildfire Risk Reduction Buffers

The Paradise Recreation and Park District (PRPD) is establishing multi-benefit green spaces on the outskirts of Paradise as nature-based solutions to reduce the spread of wildfire to the town’s urban center by providing a break in fuel loads. The green spaces will also protect the natural environment to support habitat and wildlife conservation, enhance community water and air quality, and increase opportunities for positive experiences with nature such as exercise and mental restoration. To establish the green spaces, PRPD is acquiring private land through

easements, donation, or purchase. PRPD will use controlled burns to reinstate the historic fire patterns essential to maintaining the local forest ecosystem (PRPD 2024).

Town of Paradise 1994 General Plan

The Paradise General Plan is the legal and policy foundation for all land use decisions in Paradise. It is a comprehensive expression of community values and long-term development goals and contains policy statements related to the distribution of future land uses across multiple elements—land use, circulation, housing, noise, safety, open space/conservation/energy, and education and social services. Each element identifies issues, goals, objectives, policies, and specific implementation measures. The goals and policies following are not an exhaustive list of all of the General Plan policies applicable to the proposed project; rather, it is a selection relevant to the impact discussion in this chapter.

Land Use Element

- **LUP-82.** Proposed development projects in the tertiary planning area shall acknowledge potential high wildland fire hazards, and include a comprehensive approach to regional fire protection, consistent with state and local fire protection laws and standards.

Safety Element

- **SG-6.** Improve the communication system(s) used during townwide emergencies, such as wildland fires, earthquakes or volcanic occurrences.
- **SP-2.** Through the development review process, adequate roads shall be required to be constructed and/or improved for emergency vehicle access, particularly in high wildland fire hazard areas.
- **SP-3.** Future development should be designed and constructed to take maximum advantage of known fire and crime prevention siting, orientation and building techniques.
- **SP-5.** The town should promote fire prevention by continuing to require brush removal and fuel load clearing as ongoing conditions of development approval maintenance.
- **SI-6.** Enforce and comply with the provisions of the Uniform Building Code and the Uniform Fire Code.

Town of Paradise Code of Ordinances

The Paradise Municipal Code outlines the local laws and regulations governing land use, development, and environmental protection within the town. Among its provisions, the municipal code includes a specific measure to decrease fuels to reduce wildfire risk.

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- **Chapter 8.58, Defensible Space and Hazardous Fuel Management:** This chapter is intended and shall apply to the abatement of the growth and/or accumulation of weeds, grasses, shrubs, brush, slash, tree limbs, hazardous vegetation and combustible materials on all improved parcels and designated unimproved parcels within the town and the maintenance of those parcels to prevent hazardous vegetation from growing back.

3.15.2 Existing Conditions

The project site in the Town of Paradise is in eastern Butte County, Northern California, in the foothills of the Sierra Nevada, approximately 10 miles east of Chico. The project site is currently vacant and previously contained the First Assembly of God Church, associated parking lot, and multiple residential structures that burned down during the 2018 Camp Fire. The project site and surrounding area are nearly flat, with a slight slope from east to west.

Based on the CALFIRE Fire Hazard Severity Zone Viewer, the project site is in a local responsibility area (LRA), which signifies that the local fire protection agency is responsible for serving the project site. The project site is in a Very High FHSZ (CAL FIRE 2026). Additionally, based on the CAL FIRE WUI map, the project site is in an intermix area (CAL FIRE 2025).

3.15.3 Standards for Analysis

SIGNIFICANCE CRITERIA

Appendix G, “Environmental Checklist Form,” of the California Environmental Quality Act (CEQA) Guidelines states that, “If located in or near state responsibility areas or lands classified as very high fire hazard severity zones,” the proposed project would result in a significant impact related to wildfire if it would:

- a) Substantially impair an adopted emergency response plan or emergency evacuation plan.
- b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.
- c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.

- d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

Methodology

The analysis of impacts related to wildfire hazards and risks used a review of FHSZ mapping for the county and database research prepared in compliance with federal, State, and local ordinances and regulations and professional standards pertaining to wildfire. CEQA does not generally require an agency to consider the effects of existing environmental conditions of a project's future users. Consequently, impacts under the thresholds identified below would only be considered significant if the proposed project risks exacerbating existing environmental conditions.

3.15.4 Project Impact Analysis

a) Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

The project site is in an LRA on land classified as a Very High FHSZ (CAL FIRE 2026). The project site burned in the 2018 Camp Fire. The project site is also in the intermix zone of the wildland urban interface as mapped by CAL FIRE (CAL FIRE 2025).

The Town of Paradise Emergency Operations Plan (EOP) establishes an emergency management organization and assigns functions and tasks consistent with California's SEMS and the National Incident Management System (NIMS) (Paradise 2022). Town evacuation plans include the Town of Paradise Transportation Evacuation Plan, Evacuation Technical Memorandum (Paradise 2022), and the Paradise Emergency Fire Zones and Assembly Points (Paradise 2020). Paradise Police Department is responsible for the overall evacuation and movement of citizens throughout the town when needed as well as the security of impacted areas following an incident. The primary evacuation routes in Paradise are along Skyway, Clark Road, Neal Road, and Pentz Road, as shown in the Paradise Emergency Fire Zones and Assembly Points map (Paradise 2020). Each of these roads runs roughly north-south, and secondary routes run east-west to connect residents to the evacuation routes. Specific evacuation routes will vary depending on a wildfire's location, direction, and rate of spread.

The proposed project would be required to comply with these plans and would not add any additional vehicles to the town's roadway networks. Construction of the proposed project could impact emergency operations and evacuation if it caused temporary road closures, potentially altering evacuation routes. However, as described in Chapter 2, *Project Description*, short-term and long-term staging of vehicles, equipment, and materials would be on-site and not in the

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public right-of-way, so there would be no road closures. Additionally, the proposed project would be required to comply with Very High Fire Hazard Severity Zone Fire Safe Regulations, California Building Code Chapter 7A, the California Fire Code, and Paradise Municipal Code, which have requirements for emergency vehicle access and fire-resilient construction methods and materials.

The proposed project would not physically impede the circulation network and roadways surrounding the project site during construction or operation. The proposed project would be designed in accordance with the California Building Code and California Fire Code and reviewed by the DSA. Therefore, the proposed project would not substantially impair an adopted emergency response plan or emergency evacuation plan. Impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

b) Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

As discussed in Chapter 2, *Project Description*, the project site and surrounding area are nearly flat, with a slight slope from east to west. The project site was burned in the 2018 Camp Fire. Prevailing winds come from the west or northwest, but during the summer and fall months, strong dry easterly winds can cause red flag conditions (Butte County 2023). The Butte County Air Quality Management District and Butte County Public Health Department provide air quality alerts, advisories, and resources on an interactive online map of current air quality conditions in the region. The proposed project would include minimal grading and ground-disturbing activities and therefore would not affect slope or prevailing winds and would not exacerbate wildfire.

The project site is currently vacant, with existing vegetation including trees and shrubs. Construction would include grading and excavation, trenching for site utilities, building construction, architectural coatings, parking lot, driveway and walkway construction. Approximately 4 acres of the project site would be converted into a new stadium with bleachers, concession stand, and restrooms which would also require grading and excavation.

The proposed project could expose people or structures to wildland fire risk because the project site is in a Very High FHSZ and the WUI. However, the proposed project would not introduce additional people to the area, as the new facilities would continue to serve the existing students and events already held on campus. The student capacity on the campus would not increase as a result of the proposed project. Additionally, the Town has policies and programs to reduce fire risk. These include creation of Wildfire Risk Reduction Buffers, establishment and enforcement of fuels management programs and education, and analysis and potential implementation of

more stringent fire-resistant building requirements. Additionally, the 2024 Strategic Fire Plan for California, California Wildfire and Forest Resilience Action Plan, Fire Risk Reduction Community designation for Butte County, Butte County LHMP, and Butte County Community Wildfire Protection Plan are intended to reduce wildfire hazards and dictate response to these hazards on a statewide and regional scale. Such policies and programs would reduce the risk of loss, injury, or death due to wildfire rather than exacerbate the existing wildfire risk.

The proposed project would be designed in accordance with the CBC and CFC. Project design and site plans would be reviewed and approved by the DSA. Further, the Paradise Fire & Rescue Department would review site plans to confirm fire personnel accessibility, fire hydrant locations and distribution, and water supply requirements for fire flow. During construction, personnel would handle, store, and operate construction and mechanical equipment and potentially flammable materials in accordance with manufacturers' specifications, standard safety practices, and the CFC. Fire suppression equipment during construction would be maintained on-site. Therefore, the construction and operation of the proposed project would not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire due to slope, prevailing winds, and other factors. Impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

c) Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

The project site is served by existing utility infrastructure, including water, wastewater, and power. Development of the proposed project would require new utility hook-ups to the existing utilities that serve the project site. The proposed project would be designed and constructed in accordance with the CBC and the CFC. Development of the proposed project would not require the installation of fuel breaks, roads, or any other project features that would exacerbate fire risks in the area. Therefore, the proposed project would not include the installation or maintenance of infrastructure that could exacerbate fire risk or result in temporary or ongoing impacts to the environment. Impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

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d) Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

The project site and surrounding area are nearly flat, and the project site is not in an identified landslide susceptibility zone (USGS 2026). Therefore, the project site and surrounding area would have low potential of post-fire slope instability. As discussed in Chapter 3.8, *Hydrology and Water Quality*, the project site is not in a flood zone (FEMA 2011). The proposed project would be designed and constructed in compliance with the CBC and the CFC, and grading plans would be reviewed and approved by DSA. Additionally, the proposed project would be required to comply with Paradise Municipal Code Chapter 8.55, Development of Land Areas Prone to Flood Hazards, and Chapter 8.56, Stormwater Quality Management, which have requirements to prevent downslope and downstream flooding or landslides. Compliance with applicable building and fire codes and DSA review would ensure that the proposed project would not expose people or structures to flooding, landslides, or slope instability. As discussed in Chapter 3.5, *Geology and Soils*, and Chapter 3.8, *Hydrology and Water Quality*, the proposed project would result in a less than significant impact or no impact related to flooding, landslides, stormwater/drainage, and slope instability. Therefore, the proposed project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Impacts would be **less than significant**.

Significance without Mitigation: Less than significant.

3.15.5 Cumulative Impact Analysis

Would the project have a cumulative effect related to wildfire?

The analysis of cumulative wildfire impacts is based on impacts of the proposed project plus cumulative development within and near the LRA. Future projects that may be proposed within the LRA could subject people and structures to wildfire hazards. As discussed previously, future development under the proposed project would not interfere with implementation of emergency response plans or result in significant wildfire-related impacts. Potential impacts from the proposed project associated with wildfires would be reduced through compliance with existing local, regional, State, and federal regulations. Cumulative development in adjacent jurisdictions would be subject to the same federal, State, and regional regulations, as well as regional safety plans, such as the Butte County CWPP. Cumulative projects would also be required to comply with the requirements of the CBC Chapter 7A, CFC Chapter 49, and PRC Sections 4291 et seq. Furthermore, overhead power lines would be required to comply with the 14 CCR Sections 1250 et seq. and state fire safety regulations. Compliance with these

requirements would reduce cumulative, development-related impacts of wildfire hazards and emergency response.

Compliance with regulatory requirements includes project components that would reduce wildfire risks to project visitors. Accordingly, the proposed project would not contribute to a cumulative increase in wildland fire hazards in the LRA and the potential for cumulative impacts associated with wildfire hazards would be **less than significant**.

Significance Without Mitigation: Less than significant.

3.15.6 References

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4. ALTERNATIVES TO THE PROPOSED PROJECT

4.1 INTRODUCTION

This chapter presents the alternatives analysis for the proposed project, as required by the California Environmental Quality Act (CEQA). CEQA requires that an environmental impact report (EIR) include a discussion of reasonable project alternatives that would “feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any significant effects of the project and evaluate the comparative merits of the alternatives” (CEQA Guidelines sec. 15126.6[a]).

The discussion includes an explanation of the methodology used to select alternatives to the proposed project, with the intent of identifying potentially feasible alternatives that could avoid or substantially lessen the significant impacts identified for the proposed project while still meeting most of the basic project objectives, pursuant to CEQA Guidelines Section 15126.6(a). This chapter identifies a reasonable range of alternatives that meet these criteria, and these alternatives are evaluated with respect to minimizing adverse environmental effects as compared to the proposed project. It also describes other alternatives and alternative concepts that were considered but eliminated from detailed consideration and the reasons for their elimination. For the alternatives selected for analysis, this chapter evaluates the impacts of the alternatives against baseline environmental conditions and compares the potential impacts of the alternatives with those of the proposed project. Finally, as required under CEQA Guidelines Section 15126.6(e), based on this analysis, this chapter then discusses the “environmentally superior alternative.”

The discussion in this chapter is intended to inform the public and decision makers of feasible alternatives to the proposed project that would avoid or substantially lessen any of the significant effects of the proposed project. Section 15126.6, “Consideration and Discussion of Alternatives to the Proposed Project,” of the CEQA Guidelines states that:

An EIR shall describe a range of reasonable alternatives to the project, or the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for

4. ALTERNATIVES TO THE PROPOSED PROJECT

selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason. (sec. 15126.6[a])

4.2 FACTORS CONSIDERED WHEN DEVELOPING ALTERNATIVES

This section describes the basis for determining the range of CEQA alternatives and identifies the specific alternatives that are analyzed in this Draft EIR. The primary factors considered when determining feasible alternatives to the proposed project are the identified project objectives and the significant impacts that have been identified for the proposed project.

4.2.1 Project Objectives

Chapter 2, Section 2.4, *Statement of Project Objectives*, lists the objectives that have been established for the proposed project and will aid decision makers in their review of the project, the project alternatives, and associated environmental impacts.

The following specific objectives have been identified for the proposed project:

1. Provide adequate parking to support existing and planned on-site uses.
2. Develop a new agricultural building and livestock area to support instruction, training, and hands-on learning related to agricultural operations.
3. Provide adequate athletic facilities at Paradise HS to accommodate school sports games and practices at the campus.
4. Utilize existing space to enhance opportunities for after-school athletic and extracurricular activities.

4.2.2 Significant Impacts

Apart from the No Project Alternative, alternatives to a project should be evaluated because of their ability to feasibly attain most of the basic objectives of the project and avoid or lessen the project's identified significant impacts. This DEIR did not identify any significant and unavoidable adverse impacts, as defined by CEQA, that would result from implementation of the proposed project. The following seven potentially significant impacts were found to be less than significant with implementation of mitigation measures.

4. ALTERNATIVES TO THE PROPOSED PROJECT

- **Impact BIO-1:** The proposed project could have a substantial effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.
- **Impact BIO-2:** The proposed project could interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.
- **Impact CUL-1:** Project development would cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5.
- **Impact GEO-1:** Construction of the proposed project could encounter unique paleontological resources during ground-disturbing activities.
- **Impact GHG-1:** The proposed project does not show consistency with the transportation electrification priority area of the 2022 CARB Scoping Plan. As a result, GHG emissions may result in a significant GHG emissions impact.
- **Impact HAZ-1:** In the event RECs within the soil exceed applicable screening or action levels established by DTSC, reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment could occur.
- **Impact NOI-1:** Construction activities associated with the proposed project occurring near sensitive receptors would create a substantial temporary increase in ambient noise levels.

4.3 ALTERNATIVES CONSIDERED BUT REJECTED

CEQA Guidelines section 15126.6(c) requires EIRs to identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. CEQA Guidelines section 15126.6(c) provides that among the factors that may be used to eliminate alternatives from detailed consideration in the EIR are (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts. Following is a discussion of alternatives considered and rejected, along with the reasons that alternative was not included in the analysis.

4.3.1 Alternate Site Alternative

CEQA requires the discussion of alternatives to focus on alternatives to the project or its location that are capable of avoiding or substantially lessening significant effects of the project. The key question and first step in the analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (CEQA Guidelines § 15126[5][B][1]). In

4. ALTERNATIVES TO THE PROPOSED PROJECT

general, any development of the size and type proposed by the project in a different location would have substantially the same impacts on aesthetics, air quality, cultural resources, greenhouse gas emissions, public services, transportation, tribal cultural resources, and utilities and service systems; however, impacts to biological resources, hazards and hazardous materials, hydrology and water quality, noise, and wildfire could differ (i.e., either greater or lesser impacts).

The District does not own any other properties of this size that could be used for the entirety of the proposed project. Additionally, relocating the proposed project to another site would not meet the project objectives of providing adequate parking to support existing and planned on-campus uses, providing adequate athletic facilities at Paradise HS to accommodate school sports games and practices at the campus, and utilizing existing space to enhance opportunities for after-school athletic and extracurricular activities. Therefore, this alternative is rejected from further consideration.

4.4 ALTERNATIVES SELECTED FOR ANALYSIS

The following alternatives have been determined to represent a reasonable range of alternatives that have the potential to feasibly attain most of the objectives of the proposed project and that may avoid or substantially lessen any of the significant impacts of the proposed project.

- Alternative 1: No Project Alternative
- Alternative 2: Agricultural Building on Alternate Site Alternative
- Alternative 3: Practice Field Only (No Stadium) Alternative

4.5 ALTERNATIVE 1: NO PROJECT ALTERNATIVE

The CEQA Guidelines require analysis of a No Project Alternative. The purpose of this alternative is to describe and analyze a scenario under which the proposed project is not implemented so that decision makers can compare the impacts of approving the proposed project with the impacts of not approving the proposed project. The No Project Alternative analysis must discuss the existing site conditions as well as what would reasonably be expected in the foreseeable future based on any current plans, and it must be consistent with available infrastructure and community services.

Under the No Project Alternative (Alternative 1), the District would not approve any portion of the proposed project, and none of the mitigation measures identified within this DEIR would be necessary. Under the No Project Alternative, the proposed expansion of the Paradise HS campus would not be implemented. The project site would not be developed with a new

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stadium/practice field, parking lot, or agricultural building. Paradise HS would continue to operate under its current conditions, and no changes would take place.

4.5.1 Aesthetics

Under this alternative, the project site would not have a new stadium/practice field, parking lot, or agricultural building. No structural or other visible changes to the project site would occur. Since no physical or operational changes would occur at the project site, this alternative would result in no new impacts to visual/aesthetic resources. Overall, the No Project Alternative would lessen the less-than-significant aesthetic impacts of the proposed project. Thus, impacts under this alternative would be less than those of the proposed project.

4.5.2 Agriculture and Forestry Resources

No portion of the proposed project would be developed under this alternative, and the project site would remain under existing conditions. Therefore, no impact would occur, and the No Project Alternative would lessen the less-than-significant agricultural and forestry impacts of the proposed project. Thus, impacts under this alternative would be less than those of the proposed project.

4.5.3 Air Quality

No construction would occur under this alternative; therefore, no construction-related air quality impacts would occur. Construction-related impacts would be less than the less-than-significant impacts of the proposed project. Operation (i.e., student enrollment, staffing, and general operational characteristics) under this alternative would remain similar to existing conditions. As discussed in Chapter 2, *Project Description*, the proposed project would not change enrollment capacity and staffing of Paradise HS. Therefore, operational-related air quality impacts under this alternative would be similar to the less-than-significant impacts of the proposed project. Overall, the No Project Alternative would result in air quality impacts that are less than those of the proposed project.

4.5.4 Biological Resources

No construction would occur under the No Project Alternative. The project site would continue to be vacant and undeveloped. The No Project Alternative would have no impact on biological resources. Therefore, this alternative would avoid the less-than-significant (after mitigation) impacts on biological resources from the proposed project.

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4.5.5 Cultural Resources

The No Project Alternative would not include any ground-disturbing activities, therefore, potential construction-related impacts to subsurface unknown archaeological resources would be avoided, and impacts would be less than the proposed project. The No Project Alternative would avoid the less-than-significant (after mitigation) impacts on cultural resources from the proposed project.

4.5.6 Geology and Soils

No new construction activities, including ground disturbance, would occur under the No Project Alternative. Therefore, potential construction-related impacts to subsurface unknown paleontological resources would be avoided. Construction impacts under this alternative would be less than the proposed project. Impacts related to seismic hazards would be similar to the proposed project, as they are determined by site-specific geologic conditions rather than project design or construction. Overall, the No Project Alternative would avoid the less-than-significant (after mitigation) geology and soil impacts of the proposed project and impacts under this alternative would be less than those of the proposed project.

4.5.7 Greenhouse Gas Emissions

No construction or new operational activities would occur under this alternative, and no new emissions would be generated. This alternative would eliminate the proposed project's less-than-significant (after mitigation) impacts.

4.5.8 Hazards and Hazardous Materials

Because no development would occur under the No Project Alternative, construction impacts related to hazards or hazardous materials would be less than the proposed project, and the project's less than significant (after mitigation) construction impacts would be avoided. The project site would continue to be vacant and undeveloped under this alternative and would not use, transport, or handle hazardous materials. Therefore, impacts from hazardous materials during operation would be less than those of the proposed project. Overall, the No Project Alternative would result in less hazardous and hazardous materials impacts than the proposed project.

4.5.9 Hydrology and Water Quality

Water quality conditions, groundwater supplies, drainage patterns, and surface water runoff would remain the same under the No Project Alternative because no construction or new

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development would occur. This alternative would not introduce new sources of water pollutants from the construction phase, and the impacts would be less than the proposed project during construction. Under this alternative, Paradise HS would continue to operate as a high school with the same student enrollment capacity and staffing as existing conditions, and the project site would remain vacant. This alternative would not increase impervious surfaces on the project site, and impacts related to surface runoff would be less than the proposed project. Therefore, the impacts for the operational phase would be reduced compared to the less-than-significant impacts of the proposed project. Overall, the No Project Alternative would result in less hydrology and water quality impacts than the proposed project.

4.5.10 Noise

No construction noise impacts would occur under the No Project Alternative; therefore, the construction noise impacts would be less than the proposed project. Specifically, this alternative would avoid the construction noise impacts to off-site school and residential receptors and would avoid construction vibration impacts. Under this alternative, Paradise HS would continue to operate as a high school campus, but the project site would remain vacant. Therefore, operational impacts under the No Project Alternative would be less than the less-than-significant operational noise impacts of the proposed project. Overall, the No Project Alternative would result in less noise impacts than the proposed project, and construction noise and vibration impacts would be avoided.

4.5.11 Public Services

Under this alternative, the project site would remain vacant and undeveloped. There would be no increase in student or staff populations on-site and no increase in demand for fire, police, school, library, or park services. Therefore, this alternative would eliminate the proposed project's less-than-significant impacts.

4.5.12 Transportation

There would be no construction under the No Project Alternative, and therefore there would be no impact as a result of construction-related traffic. Operation of the campus would remain the same under this alternative, games and practices would continue to be held at the existing Paradise HS football stadium, and increases in VMT under the proposed project would be avoided. Therefore, the less-than-significant impacts of the proposed project would be reduced under the No Project Alternative. Overall, the No Project Alternative would result in less transportation impacts than the proposed project.

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4.5.13 Tribal Cultural Resources

The No Project Alternative would not include any ground-disturbing activities, therefore, potential construction-related impacts to subsurface tribal cultural resources would be avoided and impacts would be less than the proposed project. The No Project Alternative would avoid the less-than-significant impacts on tribal cultural resources from the proposed project.

4.5.14 Utilities and Service Systems

No construction or expansion of utilities would occur under this alternative, therefore, no impacts to utilities and service systems would occur. Paradise HS would continue utilizing existing utilities serving the campus, and the project site would remain vacant and undeveloped. Impacts related to the expansion of utilities would be less than the less-than-significant impacts of the proposed project. Operational uses under this alternative would remain the same. Therefore, increased demand for utilities would not occur and operational-related impacts under this alternative would be less than the less-than-significant impacts of the proposed project. Overall, the No Project Alternative would result in less utilities impacts than the proposed project.

4.5.15 Wildfire

Under the No Project Alternative, the project site would not be developed, and the project would remain vacant and undeveloped. Under this alternative, the project site would still be in a Very High fire hazard severity zone (FHSZ); however, as a result of no development on the project site, impacts of wildfire would not occur. Therefore, this alternative would eliminate the proposed project's less-than-significant impacts.

4.6 ALTERNATIVE 2: AGRICULTURAL BUILDING ON ALTERNATE SITE ALTERNATIVE

The Agricultural Building on Alternate Site Alternative (Alternative 2) would result in the development of the proposed agricultural building on an alternate site. The proposed agricultural building would be constructed on an alternate District-owned site at 1023 Elliott Road, approximately 500 feet east of the project site, across Maxwell Drive, and the project site would be developed with the proposed parking lot and stadium/practice field. The agricultural building would be the same size as the building proposed as part of the proposed project but would not include a gravel parking lot. Under this alternative, the agricultural building would continue to be intended for the exclusive use of the Paradise HS students in the agricultural program.

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4.6.1 Aesthetics

Under this alternative, the agricultural building would be relocated to an alternate District-owned site at 1023 Elliott Road, while the project site would be developed with the proposed parking lot and stadium/practice field. As a result, physical changes would occur at both the alternate site and the project site. Relocating the agricultural building approximately 100 feet west of the project site would not substantially alter the visual character of the surrounding area because both sites are within the existing Paradise HS campus vicinity and are District-owned properties. Overall, aesthetic impacts under this alternative would be similar to the less-than-significant impacts of the proposed project.

4.6.2 Agriculture and Forestry Resources

Under Alternative 2, the parking lot and stadium/practice field would all be developed on the primary project site, while the agricultural building would be located on the alternate site. Similar to the project site, the alternate site is not zoned for agricultural use. Because Alternative 2 would occur on both the same project site analyzed for the proposed project as well as on the alternate site, neither of which are zoned for agricultural use, impacts to agriculture and forestry resources would be similar to the less-than-significant impacts of the proposed project.

4.6.3 Air Quality

Construction of the agricultural building would occur at the alternate site, while construction of the parking lot and stadium/practice field would continue at the project site. Therefore, construction-related emissions would be generally similar to those of the proposed project because the same agricultural building would be constructed and similar site preparation activities would occur. Operational activities would be similar to the proposed project because neither would result in an increase in student enrollment at the Paradise HS campus or generate new trips to the project site. Students and staff visiting the agricultural building on the alternate site from the Paradise HS campus and would not generate air quality impacts. Overall, air quality impacts under this alternative would be similar to the less-than-significant impacts of the proposed project.

4.6.4 Biological Resources

Development under this alternative would continue to require site disturbance associated with construction of the agricultural building at the alternate site and the parking lot and stadium/practice field at the project site. The alternate site is approximately 100 feet from the project site and near the developed Paradise HS campus. The alternate site is currently vacant;

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it was previously disturbed by a single-family residence that burned down during the 2018 Camp Fire. The alternate site has limited habitat value due to its proximity to existing school and roadway uses. Therefore, the potential for impacts to special-status species and wildlife movement would be similar to the proposed project and would remain less than significant with implementation of mitigation measures. Biological resource impacts under this alternative would be similar to those of the proposed project.

4.6.5 Cultural Resources

Ground-disturbing activities would continue under this alternative at both the alternate agricultural building site and the project site. Accordingly, the potential to encounter previously unknown archaeological resources would remain similar to the proposed project. Therefore, impacts would be less than significant (after mitigation), similar to the proposed project.

4.6.6 Geology and Soils

The alternate site would be subject to similar regional geologic conditions, including potential seismic hazards typical of the region. Construction activities associated with the agricultural building, parking lot, and stadium/practice field would continue under this alternative and would require excavation and grading. Accordingly, the potential to encounter unknown paleontological resources and other construction-related geology and soils impacts would remain similar to the proposed project. Therefore, geology and soils impacts would be similar to the proposed project's less-than-significant (after mitigation) impacts.

4.6.7 Greenhouse Gas Emissions

Construction of the agricultural building at the alternate site and the parking lot and stadium/practice field at the project site would continue to generate greenhouse gas emissions under this alternative. Operational greenhouse gas emissions would be similar to the proposed project because neither would generate an increase in vehicle trips, and student enrollment would remain unchanged. Overall, greenhouse gas emissions under this alternative would be similar to the less-than-significant (after mitigation) impacts of the proposed project.

4.6.8 Hazards and Hazardous Materials

Construction activities under this alternative would continue to involve excavation and soil disturbance at both the alternate site and the project site, resulting in a similar potential to encounter recognized environmental conditions. Construction and operation at the alternate site would involve similar use of hazardous materials typical of school facilities, including construction materials, maintenance chemicals, and landscaping products. However, because

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no known hazardous waste sites or contaminated conditions are identified at the alternate site, impacts related to hazards and hazardous materials would be less than the less-than-significant (after mitigation) impacts of the proposed project.

4.6.9 Hydrology and Water Quality

Construction of the agricultural building at the alternate site and the parking lot and stadium/practice field at the project site would continue to introduce impervious surfaces and require grading activities that could affect drainage patterns and water quality. The relocation of the agricultural building would eliminate the proposed gravel parking lot associated with that facility, making the overall changes to impervious surfaces minor. Overall, hydrology and water quality impacts under this alternative would be similar to the less-than-significant impacts of the proposed project.

4.6.10 Noise

Construction activities would remain generally similar to the proposed project because the agricultural building, parking lot, and practice field would still be constructed, although construction of the agricultural building would occur at the alternate site. Therefore, temporary construction noise impacts would remain similar to the less-than-significant (after mitigation) impacts of the proposed project. Operational noise impacts of this alternative would be similar to the less-than-significant impacts of proposed project because all project components would continue to be implemented, although across two sites. Overall, this alternative would result in similar construction and operational noise impacts to the proposed project.

4.6.11 Public Services

This alternative would continue to provide the proposed agricultural building and stadium/practice field, improving educational opportunities for the Paradise HS agricultural program and providing additional dedicated space for spectator facilities, event infrastructure, athletic practices, and physical education activities. Student enrollment and staffing would remain unchanged, and demand for public services would remain similar to the proposed project. Overall, impacts to public services would be similar to the less-than-significant impacts of the proposed project.

4.6.12 Transportation

Construction traffic would remain generally similar to the proposed project because construction of the agricultural building, parking lot, and stadium/practice field would still occur, although construction activities would be split between the project site and the alternate

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agricultural building site. Similar to the proposed project, Alternative 2 would not generate an increase in vehicle trips and student enrollment and staffing would remain unchanged. Therefore, transportation impacts under this alternative would be similar to the less-than-significant impacts of the proposed project.

4.6.13 Tribal Cultural Resources

Ground-disturbing activities associated with construction of the agricultural building at the alternate site and the parking lot and stadium/practice field at the project site would continue under this alternative. While impacts to tribal cultural resources were determined to be less than significant at the project site, there is potential to encounter previously unknown tribal cultural resources at the alternate site. Thus, Alternative 2's impacts to tribal cultural resources are a potentially significant impact and would be greater than the proposed project's impacts.

4.6.14 Utilities and Service Systems

The agricultural building, parking lot, and stadium/practice field would continue to require utility connections and municipal services under this alternative. Therefore, impacts related to the construction of utility connections and operational demand for water, wastewater, and electricity would be similar to the proposed project. Student enrollment would remain unchanged. Overall, impacts to utilities and service systems would be similar to the less-than-significant impacts of the proposed project.

4.6.15 Wildfire

The alternate agricultural building site and the project site would continue to be developed under this alternative and would remain within a Very High FHSZ. Accordingly, wildfire impacts would be similar to those of the proposed project because development would still occur on District-owned properties in the project vicinity. Compliance with applicable fire protection requirements would continue to reduce impacts to a less-than-significant level.

4.7 ALTERNATIVE 3: PRACTICE FIELD ONLY (NO STADIUM) ALTERNATIVE

Under the No Stadium Alternative (Alternative 3), the project site would be developed with the proposed agricultural building and associated infrastructure, parking lot, and practice field only, eliminating the proposed stadium component. The practice field would continue to be developed on the project site but would not include a new PA system, bleachers, concession stand, or restrooms. The field would be used for sports practices and physical education for

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students at Paradise HS only. Games would continue to be held at the existing Paradise HS stadium, and the existing athletics schedule would remain as is.

4.7.1 Aesthetics

Under this alternative, the project site would be developed with the proposed agricultural building, parking lot, and practice field, but the stadium component, including the PA system, bleachers, concession stand, and restrooms, would not be constructed. As a result, physical changes to the project site would still occur; however, the scale and visual intensity of development would be reduced compared to the proposed project. The elimination of the stadium structures would reduce the visual prominence of the project site while maintaining the proposed practice field and agricultural building. Overall, aesthetic impacts under this alternative would be reduced compared to the proposed but would remain less than significant.

4.7.2 Agriculture and Forestry Resources

Under Alternative 3, the agricultural building, parking lot, and practice field would all be developed on the primary project site, but the stadium component would be eliminated. The agricultural building would continue to support instructional activities associated with the Paradise HS agricultural program, including small-scale livestock care for educational purposes, and would not involve commercial agricultural production or forestry operations. Because Alternative 3 would be on the same project site analyzed for the proposed project, impacts to agriculture and forestry resources would be similar to those of the proposed project.

4.7.3 Air Quality

The agricultural building, parking lot, and practice field would still be constructed under this alternative. Therefore, construction-related emissions would be similar to those of the proposed project, although slightly reduced due to the elimination of the stadium structures. Operational activities would be similar to the proposed project because neither would result in an increase in student enrollment at the Paradise HS campus or generate new trips to the project site. Overall, air quality impacts under this alternative would be similar to the less-than-significant impacts of the proposed project.

4.7.4 Biological Resources

Development of the agricultural building, parking lot, and practice field would continue to require site disturbance under this alternative. As a result, potential impacts to special-status species and wildlife movement during construction would be similar to the proposed project and would remain less than significant with implementation of mitigation measures. Because

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the overall disturbance footprint would be similar, biological resource impacts would be comparable to those of the proposed project.

4.7.5 Cultural Resources

Construction under this alternative would continue to include ground-disturbing activities associated with the agricultural building, parking lot, and practice field. Accordingly, the potential to encounter previously unknown archaeological resources would remain similar to the proposed project. With implementation of mitigation measures, impacts would remain less than significant. Overall, impacts under this alternative would be similar to those of the proposed project.

4.7.6 Geology and Soils

Ground-disturbing activities associated with construction of the agricultural building, parking lot, and practice field would continue under this alternative. Therefore, the potential to encounter unknown paleontological resources and other construction-related geology and soils impacts would remain similar to the proposed project. Seismic hazards would also remain similar because they are determined by site-specific geologic conditions. With mitigation, impacts would remain less than significant.

4.7.7 Greenhouse Gas Emissions

Construction of the agricultural building, parking lot, and practice field would continue to generate greenhouse gas emissions under this alternative. Construction emissions would be slightly reduced due to elimination of the stadium structures; however, overall greenhouse gas impacts would remain similar to the proposed project. Operational emissions would be similar to the proposed project because neither would generate an increase in vehicle trips, and both would continue to serve the existing student population. Overall, greenhouse gas emissions under this alternative would be similar to those of the proposed project and would continue to require mitigation to reduce impacts to a less-than-significant level.

4.7.8 Hazards and Hazardous Materials

Construction activities under this alternative would continue to involve excavation and soil disturbance, resulting in similar potential to encounter recognized environmental conditions. Therefore, construction-related hazards impacts would remain similar to those of the proposed project. Operational hazardous materials use associated with the agricultural building and normal school operations would also remain similar to the proposed project. Overall, hazards and hazardous materials impacts would be similar to those of the proposed project.

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4.7.9 Hydrology and Water Quality

The proposed agricultural building, parking lot, and practice field would continue to introduce impervious surfaces and require construction activities that could affect drainage and water quality. Accordingly, construction and operational hydrology impacts would be generally similar to those of the proposed project. The elimination of the concession stand and restrooms would slightly reduce operational water demand and wastewater generation. Overall, hydrology and water quality impacts under this alternative would be slightly less than the less-than-significant impacts of the proposed project.

4.7.10 Noise

Construction activities would remain generally similar to the proposed project because the agricultural building, parking lot, and practice field would still be constructed. Therefore, temporary construction noise impacts would be similar to the less-than-significant (after mitigation) impacts of the proposed project. During operation, this alternative would eliminate stadium-related spectator events, the permanent PA system, and crowd noise at the new field. Games would continue to be held at the existing Paradise HS stadium. As a result, operational noise impacts would be reduced compared to the proposed project. Overall, this alternative would result in less operational noise impacts than the proposed project while maintaining similar construction noise impacts.

4.7.11 Public Services

This alternative would continue to provide the proposed agricultural building and practice field, improving educational and athletic opportunities for Paradise HS students. However, because sporting events would continue at the existing stadium, the proposed project would not provide additional spectator facilities or event infrastructure. Student enrollment and staffing would remain unchanged, and demand for public services would remain similar to the proposed project. Overall, impacts to public services would be similar to the less-than-significant impacts of the proposed project.

4.7.12 Transportation

Construction traffic would remain generally similar to the proposed project because construction of the agricultural building, parking lot, and practice field would still occur. Under this alternative, during operation, games and other spectator events would continue to be held at the existing Paradise HS stadium and would not generate an increase in vehicle trips. Because the proposed project would also not increase the number of vehicle trips, transportation

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impacts under this alternative would be similar to the less-than-significant impacts of the proposed project.

4.7.13 Tribal Cultural Resources

Ground-disturbing activities associated with construction of the agricultural building, parking lot, and practice field would continue under this alternative. Therefore, the impacts to tribal cultural resources would remain similar to the less-than-significant (after mitigation) impacts of the proposed project.

4.7.14 Utilities and Service Systems

The proposed agricultural building, parking lot, and practice field would continue to require utility connections and municipal services. However, eliminating the concession stand and restrooms would reduce utility demand, including water, wastewater, and electricity, compared to the proposed project. Student enrollment would remain unchanged. Overall, impacts to utilities and service systems would be slightly less than the less-than-significant impacts of the proposed project.

4.7.15 Wildfire

The project site would continue to be developed with the agricultural building, parking lot, and practice field and would remain within a Very High FHSZ. Accordingly, wildfire impacts would be similar to those of the proposed project because development would still occur within the project site. Compliance with applicable fire protection requirements would continue to reduce impacts to a less-than-significant level.

4.8 SUMMARY OF ALTERNATIVES EVALUATION

Table 4-1, *Comparison of Project Alternative Impacts*, compares the impact of each alternative to impacts of the proposed project. The impacts of each alternative are classified as having a reduced (↓), similar or comparable to (=), or greater (↑) level of impact when compared to the proposed project.

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Table 4-1 Comparison of Project Alternative Impacts

Environmental Topic	Proposed Project ¹	Alternative 1: No Project Alternative	Alternative 2: Alternate Development Area Alternative	Alternative 3: No Stadium Alternative
3.1 Aesthetics	LTS	↓	=	↓
3.2 Agricultural and Forestry Resources	LTS	↓	=	=
3.3 Air Quality	LTS	↓	=	=
3.4 Biological Resources	LTS/M	↓	=	=
3.5 Cultural Resources	LTS/M	↓	=	=
3.6 Geology and Soils	LTS/M	↓	=	=
3.7 Greenhouse Gas Emissions	LTS/M	↓	=	=
3.8 Hazards and Hazardous Materials	LTS/M	↓	↓	=
3.9 Hydrology and Water Quality	LTS	↓	=	↓
3.10 Noise	LTS/M	↓	=	↓
3.11 Public Services	LTS	↓	=	=
3.12 Transportation	LTS	↓	=	=
3.13 Tribal Cultural Resources	LTS	↓	↑	=
3.14 Utilities and Service Systems	LTS	↓	=	↓
3.15 Wildfire	LTS	↓	=	=

Notes:

- NI No Impact
- ↓ Reduced impact in comparison to the proposed project
- LTS Less than Significant
- = Similar impact in comparison to the proposed project
- LTS/M Less than Significant with Mitigation
- ↑ Greater impact in comparison to the proposed project
- SU Significant and Unavoidable

1. The impacts listed in this column represent the highest significance determination for each respective topic.

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Table 4-2, *Ability to Meet Proposed Project Objectives*, identifies the ability of each of the project alternatives to meet the proposed project's objectives.

Table 4-2 Ability to Meet Proposed Project Objectives

Objective	Proposed Project	Alternative 1: No Project Alternative	Alternative 2: Agricultural Building on Alternate Site Alternative	Alternative 3: Practice Field Only (No Stadium) Alternative
Provide adequate parking to support existing and planned on-site uses.	Yes	No	Yes	Yes
Develop a new agricultural building and livestock area to support instruction, training, and hands-on learning related to agricultural operations.	Yes	No	Yes	Yes
Provide adequate athletic facilities at Paradise HS to accommodate school sports games and practices at the campus.	Yes	No	Yes	No
Utilize existing space to enhance opportunities for after-school athletic and extracurricular activities.	Yes	No	Yes	Yes

4.8.1 Summary of Alternative 1: No Project Alternative

The No Project Alternative would not involve any construction or ground-disturbing activities and would therefore eliminate all construction-related impacts of the proposed project. Specifically, this alternative would eliminate the less-than-significant (after mitigation) impacts associated with biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, and noise, because no development, excavation, or construction activities would occur under this alternative. Because no project components would be constructed or operated, this alternative would eliminate construction-phase impacts such as dust generation, construction traffic, and construction-related air quality and greenhouse gas emissions.

Operational impacts would also be reduced compared to the proposed project. Under the No Project Alternative, the campus would continue to operate under existing conditions without the addition of new facilities, resulting in the avoidance of incremental operational impacts

4. ALTERNATIVES TO THE PROPOSED PROJECT

associated with increased facility use, including operational vehicle trips, associated air quality and greenhouse gas emissions, noise from athletic events, and demand for utilities generated by the proposed improvements.

Overall, this alternative would result in reduced impacts across all environmental topics. However, the No Project Alternative would not meet any of the project objectives. The No Project Alternative would not provide educational and athletic space (the agricultural building and stadium/practice field), which would reduce opportunities for Paradise HS.

4.8.2 Summary of Alternative 2: Alternate Location Alternative

The Agricultural Building on Alternate Site Alternative would relocate the proposed agricultural building to an alternate District-owned site approximately 500 feet east of the project site while retaining development of the proposed parking lot and stadium/practice field on the project site. As a result, this alternative would spread the overall scale and intensity of development at the project site across two District-owned sites while continuing to maintain the educational benefits of the agricultural program and providing additional dedicated athletic space for Paradise HS athletic programs.

Construction-related impacts under this alternative would generally remain similar to the proposed project because the agricultural building, parking lot, and stadium/practice field would still be constructed, although construction activities would occur across two District-owned sites. Operational impacts would also remain generally similar to the proposed project because the same project components would be implemented and student enrollment and staffing would remain unchanged. Minor reductions in impacts would occur for hazards and hazardous materials because no known hazardous waste sites or contaminated conditions are identified at the alternate site. Impacts to aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hydrology and water quality, noise, public services, transportation, utilities and service systems, and wildfire would remain similar to those of the proposed project because the overall development footprint and operational characteristics would be substantially the same. Impacts to tribal cultural resources would be less than significant (after mitigation) due to the potential to encounter previously unknown tribal cultural resources at the alternate site.

Alternative 2 would meet all of the proposed project objectives. This alternative would achieve the objectives of providing adequate parking to support existing and planned on-site uses, developing a new agricultural building to support agricultural instruction and hands-on learning, providing adequate athletic facilities to accommodate school sports games at the campus, and utilizing existing space to enhance opportunities for after-school athletic and extracurricular activities by providing a dedicated practice field. Although the agricultural building would be relocated to a nearby District-owned site, it would continue to support the Paradise HS

4. ALTERNATIVES TO THE PROPOSED PROJECT

agricultural program, and all proposed project components would still be implemented. Accordingly, Alternative 2 would satisfy all four project objectives.

4.8.3 Summary of Alternative 3: Practice Field Only (No Stadium) Alternative

Alternative 3 would eliminate construction and operation of the proposed stadium facilities, including the bleachers, PA system, concession stand, and restrooms, while still including development of the agricultural building, parking lot, and practice field. As a result, this alternative would reduce the overall scale and intensity of development compared to the proposed project, specifically related to operational impacts associated with spectator events, such as noise, transportation, and associated air quality and greenhouse gas emissions from event-related vehicle trips.

Construction-related impacts under this alternative would generally remain similar to the proposed project due to the continued development of the agricultural building, parking lot, and practice field. However, operational impacts would be reduced for aesthetics, hydrology and water quality, noise, and utilities, due to the elimination of stadium-related facilities and activities that would be larger in scale, generate more noise, and increase demand for water and other utilities. Impacts to other environmental topics would generally remain similar to the proposed project, as construction activities and the overall development footprint would remain similar.

Alternative 3 would partially meet the proposed project objectives. This alternative would achieve the objectives of providing an agricultural building to support instructional programs and developing athletic facilities to support student sports practices, providing parking to support on-site uses, and utilizing existing space to enhance opportunities for after-school athletic and extracurricular activities. However, because the stadium component would be eliminated, this alternative would not fully meet the objective of providing adequate athletic facilities to accommodate school sports games and broader community or spectator events at the campus. Accordingly, Alternative 3 would satisfy three out of four of the project objectives.

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4.9 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

In addition to the discussion and comparison of impacts of the proposed project and the alternatives, CEQA Guidelines Section 15126.6 requires that an “environmentally superior” alternative be selected and the reasons for such a selection be disclosed. In general, the environmentally superior alternative is the alternative to the proposed project that would be expected to generate the least number of significant impacts. Identification of the environmentally superior alternative is an informational procedure, and the alternative to the proposed project selected may not be the alternative to the proposed project that best meets the goals or needs of the District. Because CEQA Guidelines Section 15126.6(c) requires an evaluation of a reasonable range of alternatives to the proposed project, the proposed project under consideration cannot be identified as the environmentally superior alternative. Additionally, in accordance with CEQA Guidelines Section 15126.6(e)(2), if the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative from among the other alternatives.

Alternative 3 is identified as the environmentally superior alternative among the project alternatives. While this alternative would still include development of the agricultural building, parking lot, and practice field, it would eliminate construction of the stadium facilities, including bleachers, concession stand, restrooms, and a permanent PA system. As a result, Alternative 3 would reduce the overall intensity of operational activities at the project site, specifically those associated with spectator events.

Compared to the proposed project, Alternative 3 would result in reduced operational impacts to aesthetics, hydrology and water quality, noise, and utilities and service systems due to the elimination of stadium-related facilities, including the bleachers, concession stand, restrooms, and permanent PA system. Construction-related impacts would remain generally similar to the proposed project because development of the agricultural building, parking lot, and practice field would still occur. All impacts under this alternative would remain less than significant with mitigation incorporated or would be less than those of the proposed project.

Alternative 3 would still provide a new dedicated practice space for Paradise High School athletic programs, improving on-campus availability for practices and physical education activities. The existing Paradise HS stadium would continue to accommodate athletic competitions and other spectator events, allowing games to continue without the need for a new stadium at the project site. However, though Alternative 3 would reduce certain operational impacts, it would not fully achieve all of the project objectives, particularly the objective related to providing on-campus facilities for sporting events, community gatherings, and spectator accommodations. Instead, athletic events would continue to be held at the existing stadium, which limits the extent to which the project objectives are met and requires continued reliance on existing campus facilities.

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The proposed project by design is intended to serve Paradise HS, with the project site conveniently located just south of the Paradise HS campus. Although Alternative 2 would meet all four project objectives by relocating the agricultural building to a nearby District-owned property while retaining the proposed stadium, Alternative 3 is considered environmentally preferable because it consolidates all project improvements on a single site. In contrast, Alternative 2 would divide the agricultural building and athletic facilities between two separate District-owned properties, requiring students and staff to travel between sites to access the agricultural program and athletic facilities. Consolidating the proposed improvements on one site would improve operational efficiency, reduce internal circulation between facilities, minimize pedestrian crossings of Maxwell Drive, and better support coordination of school activities.

5. OTHER CEQA CONSIDERATIONS

This chapter provides a discussion of the effects of the proposed project based on the analyses in Sections 3.1 through 3.15 of this Draft Environmental Impact Report (EIR). The topics covered in this chapter include effects found not to be significant, significant and unavoidable impacts, significant irreversible changes to the environment, and growth-inducing effects. A more detailed analysis of the effects that the proposed project would have on the environment and proposed mitigation measures to minimize significant impacts is provided in Chapter 3, *Environmental Analysis*, of this Draft EIR.

5.1 EFFECTS FOUND NOT TO BE SIGNIFICANT

California Environmental Quality Act (CEQA) Guidelines Section 15128, “Effects Not Found to Be Significant,” allows environmental issues for which there is no likelihood of significant impact to be “scoped out” and not analyzed further in the EIR. Based on initial analysis for the proposed project, it was determined that the proposed project would not result in significant environmental impacts related to the following environmental impact topics, and they are not analyzed in Chapter 3, *Environmental Analysis*, of this Draft EIR.

5.1.1 Energy

Implementation of the proposed project would not generate excess energy use. The proposed project would result in short-term construction and long-term operational energy consumption.

The proposed project would increase demand for energy at the project site during construction and operational activities; however, this demand would not be considered a wasteful, inefficient, or unnecessary consumption of energy resources. The following briefly describes the sources of energy use under the proposed project and its consistency with renewable energy and energy efficiency plans.

CONSTRUCTION

Construction of the proposed project would consume energy primarily in the form of petroleum-based fuels (gasoline and diesel) for off-road equipment, material deliveries, debris hauling, and worker commutes. While interior finishing phases may utilize electric-powered tools, the bulk of energy consumption would be temporary and fluctuate with specific construction activities. This use of fuel is considered a necessary investment for the project’s completion and would not represent a permanent increase in energy demand, as all equipment

5. OTHER CEQA CONSIDERATIONS

use would cease upon project closeout. To prevent wasteful or inefficient consumption, the project will strictly adhere to California Code of Regulations (Title 13, Section 2449), which mandates the minimization of nonessential idling. Furthermore, equipment would be maintained in proper working order to ensure fuel efficiency. Therefore, construction-related energy impacts would be less than significant.

OPERATION

Operation of the proposed project would result in a negligible increase in electricity demand, primarily attributed to new security and parking lot lighting. These fixtures would be high-efficiency LEDs, consistent with the California Code of Regulations Title 24, Part 6, Building Energy Efficiency Standards, and California Green Building Code requirements, ensuring that energy use is not wasteful, inefficient, or unnecessary. Because the project relocates existing athletic events from elsewhere on the Paradise HS campus and does not expand student enrollment, it would not generate new vehicle trips or increase transportation-related fuel consumption. Furthermore, the project excludes natural gas infrastructure. Following mandatory review and approval by the Division of the State Architect (DSA) for energy compliance, operational impacts related to energy consumption would be less than significant.

RENEWABLE ENERGY AND ENERGY EFFICIENCY PLANS

The proposed project would not obstruct the implementation of state or local renewable energy plans. Electricity serving the site will be subject to the RPS requirements, ensuring a progressively cleaner energy mix through PG&E's compliance with the 2030 and 2045 carbon-free mandates. Additionally, by incorporating high-efficiency systems in accordance with CALGreen and Energy Code standards, the project actively supports the State's goal of reducing overall energy intensity. Because the project complies with all applicable energy conservation regulations and utilizes a decarbonizing grid, it would not conflict with any renewable energy or efficiency plans. Impacts would be less than significant.

5.1.2 Land Use and Planning

The five-parcel project site is located near the southern boundary of the Paradise HS campus and is surrounded by residential uses to the west, east, and south. The project site is currently vacant and previously contained the First Assembly of God Church with associated parking lot and multiple residential structures that burned down during the 2018 Camp Fire. The proposed project would develop educational and athletic facilities adjacent to the existing high school, expanding campus uses. The project would not divide an established community. The three westernmost parcels of the project site have a land use and zoning designation of Town Residential (TR 1/2), which is applied to areas that are planned for or are existing single-family residential areas characterized by small sized (one-half gross acre or less) parcels and the absence of accessory rural land uses. The proposed project includes the construction of a new

5. OTHER CEQA CONSIDERATIONS

agricultural building intended to support school-related educational and instructional activities. This facility would be an accessory use associated with the existing Paradise HS campus and would not constitute commercial agricultural production. The agricultural building would not result in a change to the site's land use or zoning designation, as animal production/livestock is permitted in a TR-1/2 zone upon town approval and issuance of an administrative permit (Paradise 2022). However, the District is exempt from local zoning and does not require an administrative permit.

The two easternmost parcels of the project site have a land use and zoning designation of Community Services (CS), which is intended for land areas that are planned to provide public or community-oriented uses or private uses that serve a community purpose or benefit the community (Paradise 2022). The operation of a public school is consistent with the CS land use and zoning designation. All construction would be within the bounds of the school site. Therefore, the proposed project would not conflict with existing land uses, and no impact to land use and planning would occur.

5.1.3 Mineral Resources

In 1975, the State legislature adopted the Surface Mining and Reclamation Act (SMARA). SMARA designated Mineral Resources Zones (MRZ) that were of statewide or regional importance. Mapping of MRZs has not been completed in and around the town of Paradise. However, the Town of Paradise 1994 General Plan states that "the Paradise region is not presently characterized as a heavily mineralized zone. There are no current mining operations in Paradise, and the past gold mining period has ended, leaving numerous abandoned gold mines, including the Bader Mine, on the periphery of northeast Paradise" (Paradise 1994). The project site is in central Paradise, and there are no indications that the project site contains significant mineral deposits or has a likelihood of containing significant mineral deposits. Implementation of the proposed project would not result in the loss of availability of a known mineral resource. The Paradise General Plan and the California Geologic Survey do not identify any active mines or quarries in the town. Therefore, the proposed project would not impact any mine or quarry operations within the town or result in the loss of availability of a locally important mineral resource. No impacts to known mineral resources would occur.

5.1.4 Population and Housing

The project site is located within a built-out, urbanized community, and is intended to serve the adjacent Paradise HS. No new roads or extensions of existing roads are proposed. The proposed project does not include the construction of any new homes or businesses. No existing homes or businesses currently operate on the project site. No changes to the existing land uses on site are proposed. The proposed project is designed to serve the current and planned student population; the proposed project would not result in increased student capacity. All proposed

5. OTHER CEQA CONSIDERATIONS

improvements would occur within the project site boundaries and therefore would not displace any housing. No impacts related to population growth would occur.

5.1.5 Recreation

The proposed project would serve the Paradise HS student population. Implementation of the proposed project would not increase the number of people served by the existing parks or other recreational facilities or displace existing recreational facilities so that the use of other parks or recreational facilities would be increased. Student population is not anticipated to change; therefore, there would be no impact to any recreational facilities.

5.2 SIGNIFICANT UNAVOIDABLE IMPACTS

CEQA Guidelines Section 15126.2(a) requires that “Direct and indirect significant effects of the project on the environment shall be clearly identified and described, giving due consideration to both the short- and long-term effects.” CEQA Guidelines Section 15126.2(c) requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. Table ES-1, *Summary of Significant Environmental Impacts and Mitigation Measures*, in the *Executive Summary* of this Draft EIR summarizes the significant impacts, mitigation measures, and levels of significance with and without mitigation.

Mitigation measures would reduce the level of impact for all significant impacts to a less-than-significant level, and no impacts would remain significant and unavoidable after mitigation measures are applied.

5.3 SIGNIFICANT IRREVERSIBLE CHANGES

Section 15126.2(d) of the CEQA Guidelines requires that an EIR discuss whether uses of nonrenewable resources during the initial and continued phases of a project may be irreversible, as well as any irretrievable commitments of resources. The following discussion considers primary and secondary impacts that generally commit future generations to similar uses, irreversible damage from environmental accidents, and irretrievable commitments of resources.

Implementation of the proposed project would result in the permanent conversion of currently vacant land, previously developed with institutional and residential uses, to expanded school facilities, including an agricultural building, stadium, and parking areas. This conversion represents an irreversible commitment of the site to institutional use and would preclude alternative future uses of the property for the life of the project.

5. OTHER CEQA CONSIDERATIONS

Construction of the proposed project would require the consumption of nonrenewable and/or slowly renewable resources, including petroleum-based fuels (e.g., gasoline and diesel), electricity, and construction materials such as aggregate, steel, and other manufactured products. These resources would be irretrievably committed, as they would be consumed during construction and would not be recoverable.

Operation of the proposed project would result in ongoing consumption of energy and water resources, similar to existing school operations, representing a long-term commitment of these resources. However, operational resource use would be consistent with typical educational facility uses and would not represent a unique or substantial irreversible demand beyond that associated with similar institutional development.

Overall, the proposed project would result in the irreversible commitment of land and irretrievable consumption of nonrenewable resources; however, such commitments are typical of urban development and necessary to meet community educational needs.

The commitment of resources required for the construction and continued operation of the site would limit the availability of resources for future generations or for other uses during the life of the proposed project.

5.4 GROWTH-INDUCING EFFECTS

Section 15126.2(e) of the CEQA Guidelines requires that an EIR evaluate the potential for a project to foster economic or population growth, or the construction of additional housing, either directly or indirectly. Typical factors may include the removal of obstacles to population growth, such as through a major expansion of a wastewater plant.

This section evaluates the proposed project's potential to create such growth inducements. As CEQA Guidelines Section 15126.2(e) requires, "It must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment." Negative impacts associated with growth inducement occur only where the projected growth would cause significant adverse environmental impacts.

Growth-inducing impacts fall into two categories: direct or indirect. Direct growth-inducing impacts are generally associated with providing urban services to an undeveloped area. Indirect, or secondary, growth-inducing impacts consist of growth-induced in the region by additional demand for housing, goods, and services associated with a population increase caused by or attracted to a new project. This analysis provides an overall discussion of project impacts and considers utility infrastructure and circulation to determine whether the project would result in direct or indirect growth inducement.

5. OTHER CEQA CONSIDERATIONS

Growth-inducing effects are not to be construed as necessarily beneficial, detrimental, or of little significance to the environment. This issue is presented to provide additional information on ways in which the proposed project could contribute to significant changes in the environment, beyond the direct consequences of developing the land use concept examined in the preceding sections of this DEIR.

The proposed project would construct a new parking lot, agricultural building, stadium, and practice field on vacant land immediately south of the existing Paradise HS campus. The project would serve existing students and staff and would not increase student capacity, enrollment, or staffing levels. As such, the project would not result in an increase in population, housing demand, or long-term employment in the region.

Construction of the proposed project would generate short-term employment; however, construction workers would be drawn from the existing regional labor force and would not induce population growth.

The proposed project represents an expansion and enhancement of existing school facilities adjacent to an established campus and does not constitute a land use change that would encourage additional development. Approval of the project would not establish a precedent for growth-inducing development beyond that already anticipated under existing land use plans.

Accordingly, the proposed project would not directly or indirectly induce population growth or the construction of additional housing, nor would it remove obstacles to growth. No significant growth-inducing impacts would occur.

5.5 REFERENCES

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