

# CALIFORNIA ENVIRONMENTAL QUALITY ACT STATEMENT OF FINDINGS

The Department of Toxic Substances Control (DTSC) has issued Findings for this project pursuant to the California Environmental Quality Act (CEQA; California Public Resources Code, Division 13, Section 21081) and implementing Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15091 et seq.)

## A. PROJECT SUBJECT TO DTSC APPROVAL

PROJECT TITLE: Soil Removal and Consolidation Plan, 2000 East El Segundo Boulevard		SITE CODING: 300331
PROJECT ADDRESS: 2000 East El Segundo Boulevard	CITY: El Segundo	COUNTY: Los Angeles
PROJECT SPONSOR: CDC Mar East Campus 1 LLC	CONTACT: Alex Rose	PHONE/ EMAIL: arose@continentaldevelopment.com (310) 640-1520
Approval Action Under Consideration by DTSC:		
<input type="checkbox"/> Removal Action Workplan <input checked="" type="checkbox"/> Interim Removal <input type="checkbox"/> Initial Permit Issuance <input type="checkbox"/> Permit Re-Issuance <input type="checkbox"/> Corrective Measure Study/Statement of Basis <input type="checkbox"/> Permit Modification <input type="checkbox"/> Closure Plan <input type="checkbox"/> Remedial Action Plan <input type="checkbox"/> Regulations <input type="checkbox"/> Other (specify):		
STATUTORY AUTHORITY:		
<input checked="" type="checkbox"/> California H&SC, Chap. 6.5 <input type="checkbox"/> California H&SC, Chap. 6.8 <input type="checkbox"/> Other (specify):		
<p>PROJECT DESCRIPTION: The Project activities involve excavation of approximately 45,000 CY to 60,000 cubic yards of arsenic-impacted soils. Project activities are detailed in the Soil Removal and Consolidation Plan (Plan) for the impacted soils. The Plan includes a detailed engineering plan for conducting the removal action, a description of the on-site contamination, and the goals to be achieved by the removal action.</p> <p><u>Background:</u> The Project site is part of the planned redevelopment at 14.3 acres of land, consisting of all or portions of eight parcels, located south of El Segundo Boulevard and west of Coral Circle in El Segundo. Raytheon currently operates administration, engineering services, laboratories, and assembly of electronics at the Project site. From the early 1980s to the early 1990s, Hughes Aircraft Company (later Raytheon), manufactured electronic and optical devices at the site. Raytheon's facility was originally granted a five-year Hazardous Waste Facility Permit (Permit) in June 1985 by the California Department of Health Services (now the Department of Toxic Substances Control or DTSC) for storing hazardous wastes at the Hazardous Waste Management Units (HWMUs). That permit was subsequently renewed multiple times and expired in October of 2017. Raytheon implemented the DTSC closure plan activities in 2019 and submitted a Closure Certification Report to the DTSC on December 20, 2019. The final Notice of Decision for Corrective Action Completion was granted by the DTSC on October 28, 2020, with an associated land use covenant (LUC) that limited the future use of Parcels 7 and 8 to commercial/industrial use and required a Soil Management Plan for any future redevelopment.</p> <p><u>Project Activities:</u> Recent investigations revealed arsenic is present in soil at several locations in Parcels 7 and 8 at concentrations that exceed the DTSC background concentration for Southern California of 12 milligrams per kilogram (mg/kg). These locations will be excavated in a manner that will result in the final developed site being completely covered by a site-wide cap containing a minimum of 5 feet of soil that has been tested to demonstrate that it does not contain arsenic at concentrations above 12 mg/kg and that it meets other human health risk criteria. An evaluation will be conducted to determine whether the impacted soil can be appropriately managed on-site and relocated to an on-site, pre-approved subsurface containment area. The relocated soil within the containment area will be capped by a 5-foot-thick layer of compliant soil and covered with a layer of base and asphalt for use as a parking lot. If it is determined that the impacted soil cannot be placed in the containment area (contains arsenic at concentrations more than 12 mg/kg), it will be properly categorized and disposed of off-site.</p> <p>In addition, volatile organic compounds (VOCs) (i.e., tetrachloroethene (PCE), trichloroethene (TCE)), have been observed in soil gas at various locations at the site at concentrations that exceed conservative screening levels for potential indoor air intrusion based on a commercial/industrial land use. The effects of VOCs in soil gas on indoor air in future buildings will be mitigated through the installation of a vapor barrier system to be placed under any future planned</p>		

buildings with enclosed space designed for human occupancy. Groundwater at depths approximately 75 to 90 feet below ground surface is contaminated with PCE and TCE. However, groundwater has not been and will not be utilized at the Project site and does not represent a risk of exposure.

The recommended remedial excavation activities combine excavation with off-site disposal of the impacted soil. The activities that would be conducted to implement the removal action include:

- Excavating approximately 45,000 to 60,000 cubic yards (cy) of arsenic-impacted soil from identified locations at depths up to 10 feet below ground surface (bgs);
- Conducting confirmation soil sampling to verify the efficacy of the remedial excavation activities and to verify that soils left in place comply with the conditions necessary for safe redevelopment;
- Implementing visual and olfactory monitoring;
- Monitoring ambient particulate matter (PM<sub>10</sub>) on the site;
- Implementing dust control measures, as needed;
- Providing field-based notifications to the South Coast Air Quality Management District (SCAQMD), as required;
- Providing field-based notifications to the Los Angeles Department of Public Health (LADPH), as required;
- Providing field-based notifications to the California Geologic Energy Managements Division (CalGEM) and the City of El Segundo, as required;
- Providing field-based notifications to the State Water Resources Control Board, as required;
- Transporting the stockpiled soil to an appropriately licensed facility; and
- Importing clean certified fill for use as backfill in the excavation.

As mentioned previously, it is estimated that the remedial activities will excavate approximately 45,000 to 60,000 cy of impacted soil. Overall redevelopment of the El Segundo South Campus will require approximately 108,800 cy of soil to be exported and another 51,100 cy of fill imported to the site. The excavated contaminated soil is considered a part of the anticipated earthwork for the overall redevelopment activities and, therefore, will not substantially increase the amount of soil to be exported. After soil testing is complete, an appropriate permitted landfill will be selected based on the results of the testing. If the soil is determined to be non-hazardous waste, it will likely be disposed of at the Recology’s Hay Road Landfill facility, 6427 Hay Road, Vacaville, California. If the soil is determined to be non-RCRA hazardous waste or hazardous waste, it will likely be disposed of at the Chemical Waste Management Disposal Site, 35251 Old Skyline Road, Kettleman City, California. After the disposal facility is determined, the soil will be loaded into end-dump trailers/trucks that will be covered with tarps prior to leaving the site for the disposal facility.

DTSC utilized information and analysis in the El Segundo South Campus Specific Plan Final Environmental Impact Report (EIR) to support a final determination about the type of environmental document required to be prepared for the Soil Removal and Consolidation Plan, 2000 East El Segundo Boulevard, as provided by Sections 15162, 15163, and 15164 of the CEQA Guidelines. Specifically, the EIR analyzed potential impacts related to contaminated soils in Section 5.7 (Hazards and Hazardous Materials) and potential impacts related to grading and construction in Section 5.2 (Transportation and Traffic), Section 5.3 (Air Quality), Section 5.4 (Greenhouse Gas Emissions), Section 5.5 (Noise), and Section 5.8 (Hydrology and Water Quality).

**B. LEAD AGENCY ENVIRONMENTAL DOCUMENT REVIEWED**

Lead Agency: City of El Segundo
Lead Agency’s Environmental Document: El Segundo South Campus Specific Plan Final Environmental Impact Report
Date Certified: January 21, 2016
State Clearinghouse Number: 2012101081

**C. STATEMENT OF FINDINGS AND FACTS FOR ADEQUACY OF LEAD AGENCY ENVIRONMENTAL DOCUMENT**

Using its independent judgment, DTSC makes the following findings:

- The Lead Agency Final Environmental Document includes a description of the Project now before DTSC for decision
- The Lead Agency Final Environmental Document adequately analyzed impacts associated with the Project before DTSC for decision.
- DTSC concurs with the findings made by the Lead Agency Final Environmental Document relating to the Project before DTSC for decision.
- Mitigation measures are included in the Lead Agency Final Environmental Document for the following resources that would potentially be affected by the DTSC project.

<input type="checkbox"/> Aesthetics	Mitigation Measure: None
<input type="checkbox"/> Agricultural Resources	Mitigation Measure: None
<input checked="" type="checkbox"/> Air Quality	Mitigation Measure: AQ-1, AQ-2, AQ-3, and AQ-4 (refer to Final Environmental Impact Report, Mitigation Monitoring and Reporting Program (January 2015), see Attachment A)
<input type="checkbox"/> Agricultural Resources	Mitigation Measure: None
<input type="checkbox"/> Biological Resources	Mitigation Measure: None
<input type="checkbox"/> Cultural Resources	Mitigation Measure: None
<input type="checkbox"/> Energy	Mitigation Measure: None
<input checked="" type="checkbox"/> Geology / Soils	Mitigation Measure: GEO-1 (refer to Final Environmental Impact Report, Mitigation Monitoring and Reporting Program (January 2015), see Attachment A)
<input type="checkbox"/> Greenhouse Gas Emissions	Mitigation Measure: None
<input checked="" type="checkbox"/> Hazards / Hazardous Materials	Mitigation Measure: HAZ-1, HAZ-2, HAZ-3, HAZ-4, HAZ-6, and HAZ-8 (refer to Final Environmental Impact Report, Mitigation Monitoring and Reporting Program (January 2015), see Attachment A)
<input checked="" type="checkbox"/> Hydrology / Water Quality	Mitigation Measure: HWQ-1 and HWQ-2 (refer to Final Environmental Impact Report, Mitigation Monitoring and Reporting Program (January 2015), see Attachment A)
<input type="checkbox"/> Land Use / Planning	Mitigation Measure: None
<input type="checkbox"/> Mineral Resources	Mitigation Measure: None
<input checked="" type="checkbox"/> Noise	Mitigation Measure: N-1 (refer to Final Environmental Impact Report, Mitigation Monitoring and Reporting Program (January 2015), see Attachment A)
<input type="checkbox"/> Population / Housing	Mitigation Measure: None
<input type="checkbox"/> Public Services	Mitigation Measure: None
<input type="checkbox"/> Recreation	Mitigation Measure: None
<input type="checkbox"/> Transportation / Traffic	Mitigation Measure: None
<input type="checkbox"/> Tribal Cultural Resources	Mitigation Measure: None
<input type="checkbox"/> Utilities / Service Systems	Mitigation Measure: None
<input type="checkbox"/> Wildfire	Mitigation Measure: None

Mitigation measures identified in the Lead Agency Final Environmental Document have been adopted by DTSC for this Project and will be implemented to avoid, reduce, or substantially lessen the project impacts. No additional mitigation measures are necessary, and no additional mitigation monitoring plan is required pursuant to CEQA.

For each significant environmental effect identified for the Project:

Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects as identified in the Lead Agency Final Environmental Document.

Such changes or alterations are within the responsibility and jurisdiction of the City of Fountain Valley not DTSC.

Such changes have been adopted by this public agency or can and should be adopted by this public agency.

Mitigation measures included in the Lead Agency Final Environmental Document are infeasible, and therefore, will not be incorporated into the DTSC Project for the following reasons: N/A

**BASED ON THE ABOVE FINDINGS, DTSC CONCLUDES:**

The proposed Project will not result in significant and unavoidable effects to the environment.

The proposed Project will result in significant and unavoidable effects to the following environmental resources:

<input type="checkbox"/> Air Quality	<input type="checkbox"/> Mineral Resources
<input type="checkbox"/> Agricultural Resources	<input type="checkbox"/> Noise
<input type="checkbox"/> Biological Resources	<input type="checkbox"/> Population/Housing
<input type="checkbox"/> Cultural Resources	<input type="checkbox"/> Public Services
<input type="checkbox"/> Energy	<input type="checkbox"/> Recreation
<input type="checkbox"/> Geology/ Soils	<input type="checkbox"/> Transportation/Traffic
<input type="checkbox"/> Greenhouse Gas Emissions	<input type="checkbox"/> Tribal Cultural Resources
<input type="checkbox"/> Hazards/Hazardous Materials	<input type="checkbox"/> Utilities/ Service Systems
<input type="checkbox"/> Hydrology/ Water Quality	<input type="checkbox"/> Wildfire

Impacts to these resources would remain significant even after applying mitigation measures described in the Lead Agency Final Environmental Document, or there is no feasible mitigation available.

In accordance with Cal. Code of Regs., title 14, section 15093, a Statement of Overriding Considerations was adopted by the Lead Agency for these resources. DTSC adopts a Statement of Overriding Considerations for these resources having determined that the DTSC Project benefits outweigh the significant environmental effects for the following reasons: The DTSC remedial actions reduce the exposure of contaminated soil, soil gas, and groundwater in order to render it safe for Site occupants. The DTSC remedial project also serves to protect human health and the environment, which are DTSC’s responsibilities under the California Health and Safety Code.

None of the conditions requiring a subsequent EIR or Negative Declaration pursuant to Cal. Code Regs., tit. 14 Section 15162 exist.

In accordance with Cal. Code of Regs., title 14, section 15093, a Notice of Determination indicating the results of said Findings will be filed with the Governor’s Office of Planning and Research / State Clearinghouse.

**D. CERTIFICATION**



\_\_\_\_\_  
Project Manager's Signature

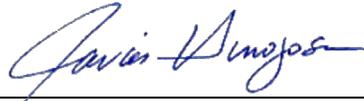
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\_\_\_\_\_  
Date

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Viktoriya Anashkina  
Project Manager's Name

\_\_\_\_\_  
Environmental Scientist  
Title

\_\_\_\_\_  
(818) 717-6549  
Phone #



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Branch Chief's Signature

5/20/2022

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Date

\_\_\_\_\_  
Javier Hinojosa  
Branch Chief's Name

\_\_\_\_\_  
Environmental Program Manager I  
Branch Chief

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(714) 854-5326  
Phone #

## Attachment A

The following mitigation measures are included in the Lead Agency Final Environmental Document would be implemented as applicable for activities described in the Soil Removal and Consolidation Plan.

**AQ-1:** Before the City issues a Grading Permit, the Director of Public Works, or designee, and Director of Planning and Building Safety, or designee, must approve Grading Plan, Building Plans, and specifications that comply with SCAQMD Rule 403, excessive fugitive dust emissions must be controlled by regular watering or other dust prevention measures, and Rule 402, which requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off-site as specified in the SCAQMD's Rules and Regulations. Implementation of the following measures would reduce short-term fugitive dust impacts on nearby sensitive receptors:

- All active portions of the construction site must be watered every three hours during daily construction activities and when dust is observed migrating from the Project site to prevent excessive amounts of dust.
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including
  - resolution of issues related to particulate matter generation.
- Pave or apply water every three hours during daily construction activities or apply non-toxic soil stabilizers on all unpaved
  - access roads, parking areas, and staging areas. More frequent watering must occur if dust is observed migrating from the site during site disturbance.
- Any on-site stockpiles of debris, dirt, or other dusty material must be enclosed, covered, watered twice daily, or non-toxic soil binders shall be applied.
- All grading and excavation operations must be suspended when wind speeds exceed 25 miles per hour.
- Disturbed areas must be replaced with ground cover or paved immediately after construction is completed in the affected area.
- Track-out devices such as gravel bed track-out aprons (3 inches deep, 25 feet long, 12 feet wide per lane and edged by rock berm or row of stakes) are required to reduce mud/dirt trackout from unpaved truck exit routes. Alternatively a wheel washer must be used at truck exit routes.
- On-site vehicle speed must be limited to 15 miles per hour.
- All material transported off-site must be either sufficiently watered or securely covered to prevent excessive amounts of dust before departing the job site; and
- Reroute construction trucks away from congested streets or sensitive receptor areas.

**AQ-2:** During construction, all trucks hauling excavated or graded material on-site must comply with Vehicle Code 23114 (Spilling Loads on Highways) regulating the manner for preventing material spilling onto public streets and roads. Before the City issues Grading Permits, the Project Applicant must demonstrate to the Director of Public Works, or designee, how operations comply with Vehicle Code 23114 during hauling activities, as applicable.

**AQ-3:** The following measures must be implemented by the contractor to reduce ROG emissions resulting from application of architectural coatings:

- Use high-pressure-low-volume (HPLV) paint applicators with a minimum transfer efficiency of at least 50 percent;
- Use pre-painted construction materials; and
- VOC content of architectural coatings cannot exceed 35 grams per liter.

**AQ-4:** Before the City issues a Grading Permit, the construction contractor must provide evidence to the Director of Public Works, or designee, that the following measures are implemented during construction:

- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.
- Improve traffic flow by signal synchronization, and ensure that all vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications.
- Require the use of electricity from power poles rather than temporary diesel or gasoline power generators.
- Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the Director determines that 2010 model year or newer diesel trucks cannot be obtained then trucks that meet EPA 2007 model year NOx emissions requirements may be used.
- During Project construction, all internal combustion engines/construction, equipment operating on the project site
- must meet EPA-Certified Tier 3 emissions standards, or higher according to the following:
  - Project start, to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 horsepower must meet Tier 3 off-road emissions standards. In addition, all construction equipment must be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor must achieve emissions reductions that are not less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

- Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 horsepower must meet the Tier 4 emission standards, where available. In addition, all construction equipment must be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor must achieve emissions reductions that are not less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit must be provided at the time of mobilization of each applicable unit of equipment.

**N-1:** Before the City issues grading permits, the Project Applicant must demonstrate, to the satisfaction of the Director of Public Works, or Designee, that the Project complies with the following:

- All construction equipment must be equipped with mufflers and sound control devices (e.g., intake silencers and noise shrouds) no less effective than those provided on the original equipment and no equipment shall have an un-muffled exhaust.
- The contractor must maintain and tune-up all construction equipment to minimize noise emissions.
- Stationary equipment must be placed so as to maintain the greatest possible distance to the sensitive receptors.
- All equipment servicing must be performed so as to maintain the greatest possible distance to the sensitive receptors.
- Impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for project construction are required to be hydraulically or electronically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler must be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves must be used where feasible, and this could achieve a reduction of 5 dBA. Quieter procedures must be used, such as drills rather than impact equipment, whenever feasible.
- A qualified "Noise Disturbance Coordinator" will be retained amongst the construction crew to be responsible for responding to any local complaints about construction noise. When a complaint is received, the Disturbance Coordinator shall notify the City within 24 hours of the complaint and determine the cause of the noise complaint (e.g., starting too early, malfunctioning muffler, etc.) and implement reasonable measures to resolve the complaint, as deemed acceptable by the Director of Planning and Building Safety; and
- Select demolition methods to minimize vibration, where possible (e.g., sawing masonry into sections rather than demolishing it by pavement breakers).

**GEO-1:** Before the City issues a Grading Permit or Building Permit, a lot-specific Geotechnical/Soils Investigation must be conducted, to the satisfaction of the Director of Planning and Building Safety, or designee. The Geotechnical/Soils Investigation must:

- Be prepared in accordance with the latest edition of the California Building Code by a civil engineer registered in this State;
- Comply with the recommendations specified in the Geology, Soils, Seismicity Report in Support of Raytheon El Segundo South Campus Specific Plan (D. Scott Magorien, C.E.G., March 6, 2013); and
- Recommend the appropriate corrective action, which is likely to prevent structural damage to each structure proposed to be constructed in the area where geotechnical/soils problems exist.

**HAZ-1:** Before a Grading Permit is issued, the actual location of onsite oil/gas wells must be verified with the DOGGR. All onsite wells present must be properly plugged and abandoned per current DOGGR, DTSC, and RWQCB requirements. Further, an environmental consultant with Phase II/site characterization experience must verify through soil sampling that no residual contamination has resulted from historic oil/gas production activities onsite.

**HAZ-2:** Before a Grading Permit is issued, soil sampling must be conducted within the portions of the Project site that have historically been utilized for agricultural purposes and may contain pesticide residues in the soil, as determined by a qualified Phase II/site characterization specialist. The sampling, conducted in consultation with the El Segundo Fire Department, must determine if pesticide concentrations exceed established regulatory requirements and identify further site characterization and remedial activities, if necessary. Should further site characterization/remedial activities be required, these activities shall be conducted per the applicable regulatory agency requirements, as directed by the El Segundo Fire Department.

**HAZ-3:** Before a Grading Permit is issued, an environmental consultant with Phase II/site characterization experience must determine, based on the Current Conditions Report (CCR), RCRA Facility Investigation Work Plan (RFI Work Plan),

and sampling and analysis conducted in accordance with the RFI Work Plan, whether subsurface release of hazardous materials/waste to the soil/groundwater associated with the existing storage facilities has occurred. If subsurface release of hazardous materials/waste to the soil/groundwater has occurred, the environmental consultant must determine if contaminant concentrations exceed established regulatory requirements and identify further site characterization and remedial activities, if necessary. Should further site characterization/remedial activities be required, these activities must be conducted per the applicable regulatory agency requirements.

**HAZ-4:** Before a Grading Permit is issued, an environmental consultant with Phase II/site characterization experience must prepare a Worker Safety Plan to ensure construction worker safety during grading/excavation activities, based on their review the following documents:

- Current Conditions Report (CCR);
- RCRA Facility Investigation Work Plan (RFI Work Plan);
- Findings of the RFI Work Plan's Sampling and Analysis; and
- Existing Hazardous Materials Conditions Assessment.

**HAZ-6:** If during construction unknown wastes or suspect materials are discovered by the contractor that are believed to involve hazardous waste or materials, the contractor must comply with the following:

- Immediately cease work in the vicinity of the suspected contaminant, and remove workers and the public from the area;
- Notify the Director of Public Works, or designee, of the City of El Segundo;
- Secure the area as directed by the Director of Public Works or designee; and
- Notify the El Segundo Fire Department (or other appropriate agency specified by the Director of Public Works). The Fire Department's Environmental Safety Manager can advise the responsible party of further actions that must be taken, if required.

**HAZ-8:** At least three business days before any lane closure, the construction contractor must notify the El Segundo Fire Department, El Segundo Police Department, El Segundo Public Works Department, and the El Segundo Planning and Building Safety Department of construction activities that would impede movement (such as road or lane closures) along roadways immediately adjacent to the development area, to allow for uninterrupted emergency access and maintenance of evacuation routes.

**HWQ-1:** Before the City issues any grading permit, the Applicant must conduct a Construction Level Hydrology and Hydraulics Study to determine potential storm water runoff rates and peak flows from the Project site per County of Los Angeles methodology. The 50-year storm flows for both existing and proposed Project conditions must be included in the study. The Study must be completed by a qualified professional, approved by the Director of Public Works, and be consistent with standard engineering practices for the region, including the use of the Los Angeles County Manual. The Study must demonstrate the effect of storm water discharges to any City, County, or other agency-owned drainage or flood control facility, as mitigated and be designed and implemented to prevent an increase in the rate or amount of storm water runoff above the baseline condition.

The Study must also determine whether onsite detention is required. If the final hydrology calculations determine that onsite detention is required to avoid downstream impacts, the Study must also identify the necessary flood control mitigation, which may include a surface stormwater detention pond, subsurface detention structure, or subsurface detention pipes. The construction level hydrology calculations and Construction Level Hydrology and Hydraulics Study must be prepared and reviewed by the Director of Public Works and Director of Planning and Building Safety, or designee, before any Grading Permit is issued.

**HWQ-2:** Before the City issues any permit for development of an individual parcel, the Construction Level Hydrology and Hydraulics Study must be updated and submitted to the Director of Public Works for review. The phasing must be implemented to prevent an increase in the rate or amount of storm water runoff above the baseline condition.