Final Supplement to the Master Environmental Impact Report

TRACY INDUSTRIAL AREAS SPECIFIC PLAN

Prepared for the City of Tracy

Prepared by

EDAW, Inc.

in association with

DKS Associates Richard L. Meehan and Associates Sierra Research, Inc.

November 1989

FINAL SUPPLEMENT

to the

MASTER ENVIRONMENTAL IMPACT REPORT

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1. INTRODUCTION

1.1 Introduction

A Draft Supplement to the Master Environmental Impact Report for the Tracy Industrial Areas Specific Plan was prepared for the City of Tracy and distributed in September 1989. The public review period for the EIR extended for 30 days until October 26, 1989.

Comments to the Draft were received by the State Clearinghouse and distributed to the City of Tracy. These comments were subsequently forwarded to the consultants for review and response.

Under CEQA EIR guidelines, lead agencies are required after completion of the Draft EIR to consult with and obtain comments from public agencies having jurisdiction by law with respect to the project, and to provide the general public and applicant with opportunities to comment on the Draft EIR. The lead agencies are also required to respond to substantive environmental points raised in this review and consultation process.

In keeping with the California Environmental Quality Act EIR guidelines, this Final EIR Supplement has been prepared based upon comments on the Draft EIR Supplement received during this review period.

1.2 Report Organization

Several comments were submitted in written form during the public review period. These letters and written comments are reproduced in Chapter 2 of this report.

Chapter 3 contains the response to these comments by number, as noted at the left hand side of each comment on the various letters.

2. LETTERS AND WRITTEN COMMENTS

DEPARTMENT OF TRANSPORTATION

P.O. BOX 2048 (1976 E. CHARTER WAY) STOCKTON, CA 95201 TDD (209) 948-7853 (209) 948-7838

October 24, 1989



10-SJ-205 PM-8.1 City of Tracy Industrial Specific Plan Amendment Yellow Freight DEIR SCH #89062612

Mr. John Keene State Clearinghouse 1400 Tenth Street Sacramento, CA 95814

Dear Mr. Keene:

Caltrans has reviewed the Draft EIR for the Yellow Freight Terminal proposal in the City of Tracy and offers the following comment:

The traffic analysis doesn't include any evaluation of the projects (Yellow Freight) 0 Comment Al truck traffic impact on the I-205 McArthur interchange regarding structural and operational issues such as turning movements, ramp radius, etc.

The report fails to provide an adequate traffic analysis. There needs to be an analysis Comment A2 0 of existing, project related and cumulative traffic impacts to the I-205 mainline along with the McArthur interchange ramps and ramp intersections in terms of V/C (Ratio of volume to capacity) and LOS (Level of Service).

Peak hour turning movements at ramp intersections should also be shown.

Appendix "A" page 6, 1st paragraph. Comment A3 0

> Reconstruction of the I-205 McArthur ramps is proposed as a mitigation for development plans. This negotiation proposal extends beyond the 50% IASP buildout.

A Project Study Report will be required for any major interchange work that may be Comment A4 0 necessary resulting from the proposed Yellow Freight Terminal development.

> If you have any questions in regard to our comments please call Mr. Ken Baxter at (209) 948-7936 of our Planning section.

Sincerely,

JOHNSON IGR Coordinator

∞: P Verdoorn/SJCCOG



Memorandum

To:

State Clearinghouse Office of Planning and Research 1400 Tenth Street Sacramento, CA 95814

Date: October 25, 1989

File:

Attention John Keene

From:

DEPARTMENT OF TRANSPORTATION DIVISION OF ABRONAUTICS

Subject

The City of Tracy's DEIR for the Industrial Specific Plan Amendment - Yellow Freight; SCH #89062612

The California Department of Transportation, Division of Aeronautics, has reviewed the above-referenced document with respect to the Division's area of expertise as required by CEQA. The following comments are offered for your consideration.

As we stated in our August 9, 1989 response to the Notice of Preparation, the Division is concerned with the close proximity of the proposal, particularly the diesel fuel storage tanks, to the adjacent crop dusting airstrip.

According to the DEIR, there is an "increased potential hazard and risk from fuel storage and increased activity at the end of Haley's Flying Service runway." The DEIR also states that "Yellow Freight can assist in arranging relocation of Haley's Flying Service to a more suitable location." This relocation alternative and the safety issues should be further addressed in the Final EIR.

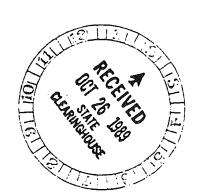
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Thank you for the opportunity to review and comment on this proposal.

JACK D. KEMMERLY, Chief Division of Aeronautics

Sandy Resnard

Environmental Planner



SAN JOAQUIN COUNTY

AIR POLLUTION CONTROL DISTRICT

JOGI KHANNA, M.D., M.P.H. Air Pollution Control Officer

P.O. Box 2009 • (1601 East Hazelton Avenue) • Stockton, California 322725

(209) 468-3470

October 18, 1989

Michael Belluomini Associate Planner City of Tracy Community Development Dept. 520 Tracy Boulevard Tracy, CA 95376

RE: Industrial Area Specific Plan

Yellow Freight

The San Joaquin County Air Pollution Control District has reviewed the planning documents.

The District has the following comments and recommendations:

bomment Cl 1. San Joaquin County's air quality relative to National Ambient Air Quality Standards set forth in the Clean Air Act is as follows:

> PM-10 Non-attainment

Non-attainment(for Stockton Metropolitan

Statistical Area only)

Ozone Non-attainment(possible SIP call area)

The Traffic Analysis and Air Quality Analysis supplied as Appendix A to the Industrial Area specific Plan for the proposed Yellow Freight project has been reviewed and the District Offers the following comments:

- Comment C2 1. Trip generations are offered for the PM peak hours "approximately 21 truck trips and 20 auto trips..." yet the Average Daily Traffic (ADT) is "Approximately 150 truck trips and 750 auto trips...based on the assumption that each of the 300 employees would drive alone..." The Consultant offers no explanation as to how or where the additional traffic generated from the other 80 employees (my assumption is that 1/3 of the employees work per shift, assuming there are three shifts and each drives alone) during peak hours.
- The parking lot should be designed to promote the mitigation Comment C3 2. measures proposed by Serria Research, Inc. Ridesharing would be difficult at best to sale if there is a parking space per employee. The parking lot should be 60% to 75% of the present suggested capacity.

Community Davelopmen

87-16-GPA

YELLOW2

Experience has shown that ridesharing and transit programs often have poor results when free parking is plentiful. Failure to consider the effect of parking supply and cost on the employee choice of travel mode will greatly effect the success of any program. A parking management program could have the following 1) Preferential Parking for carpools and vanpools. A minimum of a 10% set-aside, 2) Pay incentive program to not to pollute. Two suggestion are a) a direct payment to employees who use alternative transportation or b) provide each employee transportation allowance applied toward either parking or other commute expenses. At the same time the employer or developer would begin to charge for parking. This would result in a net cost of zero to those who continue to drive to work alone.

fomment C4

3.1.3.1 Executive Summary states that "...the future czone air quality in Tracy has very little to do with growth and development in Tracy." The California Clean air places the responsibility for (AB2595) any and transport of pollutants on the district of origin. Joaquin County APCD has to account for emissions generated from growth and development in Tracy and else where in the county. The EIR should address mitigating transport or unavoidable impacts. AB 2595 does not allow the District to continue to over look any pollution generating within its boarders.

Comment C5

Table 4.3 Worst-Case (Winter) Motor Vehicle Carbon Monoxide Emission Factors (gram/mile) Using the same input values as stated on page 5 & 6 the District results where higher than those in Table 4.3. The District cannot get results for individual years, i.e. 1989, 1990, 1991, etc., but for the year 1990 the result for the average speed of 20 mph have 64.93 grams/mile minus I/M credits of 9.8% = 55.57. The District has EMFAC7C, but according to ARB one should adjust up (Example year 1987 and 2000 a +8 and +16 respectively) sot therefore the District's figure is conservative. The District has attached its result for your examination.

YELLOW2

Comment C6

5. Table 4.9 Truck Terminal Added VMT Estimates shows vehicle miles traveled (VMT) expected from Yellow Freight and the Industrial Site at 50% buildout. DSK Associates "estimate that 50% buildout ... would generate 32,542 added vehicle trips/day in the Tracy area." This "excludes trips related to the proposed truck terminal..." (Yellow Freight). At an average of 8.44 miles per trip further supports the District's opinion that emission factors in Table 4.3 might be off. The emissions from Yellow Freight is estimated at 7,903. (32,542 + 7.903 = 40,445 x 8.44 = 341,355.8 VMT/day beginning with the year 1991). This does not account for growth outside of this project.

The City should make a commitment to implement all mitigation measures proposed. Example "The City of Tracy shall consider the cumulative affect of growth and development on air quality and shall use land use regulations to control air pollution."

The District appreciates the opportunity to comment on the application. If you have any questions regarding the matter, please do not hesitate to contact T. Abdul Salaam (209) 468-3470.

Jogi Khanna, M.D.; M.P.H. District Health Officer and Air Pollution Officer

Lakhmir Grewal, Director

Air Pollution Control District

JK\LG\TAS

ENCLOSURES

PERCENT VMT	YEAR : 1990 COLD : 80.0 GRAMS	PERCENT	PERATURE : VMT HOT :	40 20.0	Non-Truck
Speed 5 MPH 10 MPH 15 MPH 20 MPH 25 MPH 30 MPH 35 MPH 40 MPH 45 MPH 50 MPH 55 MPH	TOG 15.93 11.20 8.19 6.20 4.85 3.91 3.25 2.78 2.44 2.20 2.05	CO 190.17 137.22 102.87 79.43 62.91 51.05 42.52 36.48 32.45 30.15 29.50	NOX 3.99 4.02 4.07 4.15 4.25 4.36 4.49 4.64 4.80 4.98 5.17		TERMINA

tal Organic Gases Carbon Monoxide Litrogen Oxide Idle Emission Factors

0.51 Grams/Minute

7.71 Grams/Minute

0.23 Grams/Minute

	PE	RCENT	VMT	YEAR: 1990 COLD: 80.0 GRAMS	PERCENT	PERATURE VMT HOT	: 40 : 20.0	Truck
E:sa.	Spe	a d						
•	-			TOG	CO	NOX		
17.3	5	MPH		17.09	169.17			
	10	MPH		12.48		4.15		
1.19					130.49	3.65		
		MPH		9.45	102.70	3.29		
	20	MPH		7.36	81.49			
-		MPH				3.05		
. [5.88	64.93	2.89		
. }	30	MPH		4.81	51.91	·		
	35	МРН				2.81		
				4.02	41.66	2.80		
- [40	MPH		3.44	33.59	2.85		
1	45	MPH		3.01				
					27.28	2.97		
		MPH		2.70	22.35	3.17		
- 7	5 5	MPH		2.47	18.50	3.47		

otal Organic Gases Larbon Monoxide Nitrogen Oxide Idle Emission Factors

0.21 Grams/Minute

1.99 Grams/Minute

0.25 Grams/Minute

	222	. ~ ~		YEAR : 1995			PERATURE		40	Truele
	PER	RCENT	VMT		.0	PERCENT	VMT HOT	:	20.0	
				GR	AMS PER	MILE			•	Consinsol
PROF.	Spee	e d		TOG		CO	хои			
1	Spee 5 10	MPH		13.28	14	7.15	3.77			
-	10	MPH		9.90	11	3.61	3.31			
	15	MPH		7.63		9.77	2.98			
	20	MPH		6.04		1.54	2.76			
A THEORY	25	MPH		4.88		7.26	2.62		1	
	30	MPH		4.03		5.98	2.54			
	35	MPH		3.39	3.	7.05	2.52			
1	40	MPH		2.91		0.02	2.56			
	45	MPH		2.55	2	4.50	2.65			
		MPH	11	2.28	20	0.19	2.82			
- 1	5 5	MPH		2.07	1 (5.79	3 07			

otal Organic Gases Carbon Monoxide Nitrogen Oxide Idle Emission Factors

0.18 Grams/Minute

1.88 Grams/Minute

0.23 Grams/Minute

PERCENT VMT		TEMPERA PERCENT VMT	TURE : 40 HOT : 20.0	Non-Truck
Speed 5 MPH 10 MPH 15 MPH 20 MPH 25 MPH 30 MPH 35 MPH 40 MPH 45 MPH	GRAMS TOG 13.55 9.58 7.06 5.38 4.23 3.43 2.86 2.45 2.15	PER MILE CO 178.37 3 128.04 3 95.79 3 73.98 4 58.72 4 47.84 4 40.06 4 34.62 4	NOX .88 .92 .99 .08 .18 .29	Non-Truck Treminal
50 MPH 55 MPH	1.95	29.14 4.	72 88 06	

tal Organic Gases Tarbon Monoxide Vitrogen Oxide

Idle Emission Factors

0.49 Grams/Minute 7.66 Grams/Minute

0.23 Grams/Minute

PERCENT	YEAR : 2000 VMT COLD : 80.0 GRAMS	PERCENT	PERATURE : VMT HOT :	40 20.0
Speed 5 MPH 10 MPH 15 MPH 20 MPH 25 MPH 30 MPH 35 MPH 40 MPH 45 MPH	GRAMS TOG 12.08 8.62 6.37 4.86 3.83 3.10 2.58 2.21 1.94	PER MILE CO 161.67 117.33 88.13 68.16 54.11 44.05 36.82 31.73 28.34	NOX 3.77 3.81 3.88 3.96 4.06 4.17 4.30 4.43 4.58	
50 MPH 55 MPH	1.75	26.45 26.03	4.74	

tal Organic Gases Carbon Monoxide Nitrogen Oxide

Idle Emission Factors

0.44 Grams/Minute

6.76 Grams/Minute

0.22 Grams/Minute

Truck

A CONTRACTOR OF THE PARTY OF TH				YEAR :	2000		TEM	PERAT	URE	:	40
1,2	PEI	RCENT	VMT	COLD :	80.0		PERCENT	VMT	HOT	:	20.0
					GRAMS	PER	MILE				
	Spe	ed		7	rog		CO		NOX		
	Spe 5	MPH		11.8	3 2	135	5.97	3.	58		
		MPH		8.9	93	100	5.85	3.	. 13		
A-4-15	15	MPH		6.9	9 2	84	1.79	2.	82		
- Comment	20	MPH		5.4	19	6.	7.62	2.	60		
7	25	ИРН		4.4	4	54	1.10	2.	46		
	30	MPH		3.6	56	4:	3.40	2.	. 39		
	35	MPH		,3.0	7	34	1.92	2.	37		
	40	MPH		2.6	3	28	3.22	2.	40		
	45	MPH		2.3	30	22	2.93	2.	49		
I	50	MPH		2.0	5	18	3.77	2.	6.5		
-	55	MPH		1.8	3 6	15	5.53		88		

Idle Emission Factors Total Organic Gases 0.16 Grams/Minute

Carbon Monoxide 1.63 Grams/Minute itrogen Oxide 0.22 Grams/Minute

3. RESPONSE TO COMMENTS

- A1 The issues in the comment are discussed on pages 5 and 6 of Appendix A in the DEIR. Turning movements are presented in Table 2 of Appendix A. Page 6 of Appendix A states that the proposed redesign of the MacArthur interchange underpass as part of the Industrial Area Specific Plan mitigation program would accommodate the largest semitrailer trucks in motion within the turn lanes, but that trucks turning from a stopped position would need to turn wide, outside striped turn lanes. This would not be a serious operational deficiency.
- A2 Traffic impacts on I-205 are discussed on pages 4-8 of Appendix A of the DEIR, including existing, project-related and cumulative traffic conditions, for both the I-205 mainline and the MacArthur interchange ramps.

For the I-205 mainline, project traffic would constitute less than 10 P.M. peak hour directional trips. This would represent less than one-half of one percent of the total directional volume, which would have no noticeable affect on either V/C ratios or levels of service. Therefore, no detailed V/C or LOS analysis was conducted.

On the MacArthur interchange ramps, project related traffic would be 5 percent or less of total P.M. peak hour ramp volumes during the project's initial year, and 3 percent or less by 1997, the estimated horizon year for 50% buildout of the Industrial Area Specific Plan (DEIR Appendix A, Table 2). These increases would be within the range of day-to-day variation in P.M. peak hour volumes; therefore no detailed V/C or LOS analysis was conducted.

Table 2 of the DEIR Appendix A shows peak hour turning movements at the MacArthur interchange for existing conditions, future conditions with 50% buildout of the Industrial Area Specific Plan with the project, and project share of total P.M. peak hour ramp turning movements.

A3 The potential mitigation identified in the comment would not be needed to mitigate project related impacts (those from the proposed Yellow Freight development) or from development of the 50% buildout scenario for the Industrial Area Specific Plan. It is identified as a proposed mitigation for development beyond the 50% buildout scenario, which would be subject to a separate environmental evaluation.

- B1 Comment noted. The mitigation should be adjusted to read: "Yellow Freight could assist in arranging relocation of Haley's Flying Service to a more suitable location or revise the site plan to reduce the potential hazard caused by the proximity of fuel storage tanks to Haley's Flying Service".
- C1 In section 3.1.3.3, Historical Air Quality, discussions by pollutant (sub-sections 3.1.3.3.1 through 3.1.3.3.6) indicate if the Tracy project area is currently classified as "non-attainment" as defined in the Federal Clean Air Act. An exception is sub-section 3.1.3.3.5, Suspended Particulate Matter. The following sentence should be added at the end of sub-section 3.1.3.3.5;

"Tracy and the entire san Joaquin County are currently designated as 'non-attainment' for PM10."

C2 The comment refers to the <u>project P.M.</u> peak hour of trip generation, which would be approximately 2-3 P.M. during the afternoon shift change, whereas the traffic analysis detailed in Appendix A focuses on the <u>adjacent street system P.M.</u> peak hour, which is the single hour of greatest traffic volumes on adjacent streets between 4:00 P.M. and 6:00 P.M.

In a typical EIR traffic analysis, project traffic impacts are analyzed for the peak hour on nearby streets, unless project traffic generation would be enough to change the local street system's peak hour, which would not be the case with the proposed timing of shift changes, the 20 P.M. peak hour auto trips referred to in the comment would consist primarily of delivery and service trips, rather than employee trips.

C3 Comment noted. Highly successful TSM programs such as those in place at Bishop Ranch in San Ramon, which include ridesharing, are able to achieve non-auto driver rates of up to 40%. The proposed Yellow Freight Terminal will be a relocation of an existing terminal rather than an entirely new development. This means that the employees are already known, and TSM measures such as ridesharing programs and other incentive programs such as those identified in the comment can be successfully developed before the project is built. Such programs would need to be in place before the project is developed if the proposed parking supply is reduced by 25% to 40%, as is suggested in the comment.

C4 The comment implies that downwind impacts of emissions generated in Tracy from 50% buildout of the IASP have been ignored in the air quality analysis. In fact, the very next sentence after the one quoted in the comment states:

"However, emissions from Tracy do contribute to ozone levels that occur in 'downwind' areas, at least as far away as Bakersfield."

To address these potential impacts, project-specific mitigation measures identified in the Draft EIR will be pursued.

Therefore, we believe the analysis and suggested mitigation contained in the Draft EIR are consistent with the requirements of the California Clean Air Act (AB 2595).

- C5 We have reviewed this comment and have determined that the District's emission factor estimates do not match those generated in the air quality analysis for two primary reasons:
 - ~ incorrect use of the cold/hot start ratio
 - incorrect use of I/M (Inspection and Maintenance) program credits

In section 4.1.3.1 of Appendix B, we state that the emission factor estimates are based on an 80%/20% cold/hot start ratio. This means that 80% of vehicle starts are cold and 20% of the starts are hot. Emission factors generated by the District assume 80% of travel (i.e. VMT) in the cold start mode and 20% of travel in the hot start mode. This is not equivalent to an 80%/20% cold/hot start ratio and assumes no travel occurs in the stabilized mode. In the EMFAC model, vehicle "start" mode emissions are assumed to occur during the initial 3.59 miles of a trip. Beyond that distance, the vehicle emits in the stabilized mode. Knowing the average trip length (in miles) and the ratio of cold and hot starts, the percentage of travel in the cold start, hot start and stabilized emission modes can be computed as follows:

```
% VMT Cold = (% Cold Start x 3.59) / (Trip Length)
% VMT Hot = (% Hot Start x 3.59) / (Trip Length)
% VMT Stab. = (Trip Length - 3.59) x 100 / (Trip Length)
```

Using these equations, non-truck terminal traffic (trip length = 8.44 miles) percentages are: 34% VMT cold, 9% VMT hot and 57% VMT stabilized. For truck terminal traffic (weighted average trip length = 27.2 miles) the percentages are: 11% VMT cold, 3% VMT hot and 86% VMT stabilized.

In their comment, the District applies the assumed carbon monoxide I/M credit of 9.8% to a 64.93 grams/mile fleet average emission factor to produce an emission factor with the presence of I/M of 55.57 grams/mile. It appears that this arithmetic is incorrect:

$$64.93 \times (1 - 9.8/100) = 58.57 \text{ (not } 55.57).$$

In addition, the 9.8% carbon monoxide I/M credit applies only to those motor vehicles subject to I/M. In California, only gasoline vehicles up to 8,500 lbs and less than 20 years of age are subject to I/M (diesel vehicles, heavy-duty trucks and motorcycles are exempt). To adjust a composite (i.e. fleet) non-I/M emission factor to reflect the presence of I/M, it is necessary to determine the fraction of the on-road fleet for which I/M is not required. In San Joaquin County, this component is 14%. Therefore the carbon monoxide fleet emission reduction due to I/M is:

$$9.8\% \times (1 - 0.14) = 8.4\%$$

- C6 In the air quality impact analysis, two components of vehicle travel associated with proposed development in Tracy were analyzed:
 - 1. Incremental travel resulting from operation of the Yellow Freight Truck Terminal,
 - 2. Incremental travel from 50% buildout of all other development contained in the Tracy Industrial Specific Plan.

Table 4.9 shows the net vehicle miles traveled (VMT) per day associated only with operation of the Yellow Freight Truck Terminal in Tracy. As indicated in the Table, trip lengths associated with this component of travel as supplied by DKS Associates are 19.2 miles and 35.6 miles for the Yellow Freight employee vehicles and cargo trucks, respectively. Estimates of trips, trip length and VMT resulting from the second component (50% IASP buildout), an average trip length of 8.44 miles for the second component of incremental travel was assumed. This estimate was computed from San Joaquin Countywide VMT and vehicle trip estimates compiled by the California Air Resources Board (CARB) and represents an average vehicle trip length in the County. The emission factor estimates shown in Table 4.3 are based on 19.2/35.6 mile weighted trip lengths for Yellow Freight project travel (Truck Terminal traffic) and an 8.44 mile trip length for other IASP development (non-Truck Terminal traffic).

Growth "outside" of 50% buildout of the Industrial Specific Plan (including the Yellow Freight Terminal) is accounted for with the County-wide growth data compiled by CARB discussed in the first paragraph on page 17 of Appendix B (Impacts and Mitigation). The emissions forecasts presented in Table 4.12 are based on an annual VMT growth rate of 3.3% per year between 1989 and 1997 (computed from the CARB growth data) which represents projected vehicle travel increases resulting from other development in San Joaquin County during that period.

In addition to the formal comments provided, a comment by Ken Wolfe is noted referring to inaccurate project boundaries. It should be noted that the annexation to Urban Reserve includes the 1.99 acre site at the northeast corner of Pescadero Road and MacArthur Drive, the approximate three quarters of an acre triangle of land on the north side of I-205 660 feet east of MacArthur, and the intervening 6 acre right-of-way.

The Department of Food and Agriculture has also expressed concern on how the industrial development and farming interface would be mitigated, besides the Right-to-Farm ordinance. However, in discussing this with Donna McIntosh of the Department, she does not believe that industrial development of this type would be a significant impact on neighboring farming operations, and, therefore, would not necessarily restrain adjacent agricultural use. There are no official setbacks/buffer zones required by the County Agricultural Commissioner relating to this interface, especially in relation to crop dusting activities, however, there are regulations which exist that govern application of chemicals and minimizing drift. The site plan suggests a large parking area which would act somewhat as a buffer zone to protect people from potential adverse impacts from crop dusting activities, however, this would not prevent potential damage to property on the Yellow Freight site (eg. dust on cars/trucks). The Draft EIR suggests that a "landscaped buffer zone and adequate screening" be used to minimize impacts. This last sentence of paragraph 2 of Section 4.3.3.2 of the Draft EIR should be amended to read as follows:

"Landscaped screening/buffer zones of adequate height and density to minimize potential drift from farming and/or crop dusting operations and to guarantee the privacy and integrity of the neighboring land uses as outlined in the Specific Plan must be implemented. At the same time, precautions must be taken to insure that landscaping does not interfere with potential crop dusting activities and that the landscape is sufficiently maintained for both aesthetic reasons and to insure maximum efficiency."