

November 13, 2014

Ms. Kelli Cahill
Project Planner
Napa County Planning, Building, & Environmental Services Department
1195 Third Street, Suite 210
Napa, CA 94559

Dear Kelli:

Thank you for hosting the Public Hearing on November 12, 2014. I appreciate, as does most of the community, that a forum was provided to publicly air our concerns. This letter is in follow-up to my comments at the forum, and includes portions of my comments and elaborations. I object to the Walt Ranch draft EIR on many grounds, but will focus in this letter on Section 4.8.

I moved to Circle Oaks, as did most of the community because it is quiet. According to a sound study conducted over the two weeks preceding November 10, 2014, it is 33 decibels. How quiet is 33 decibels? It is the prevailing background noise of nature. It is as quiet as a whisper. It is what birds sound like when the robins come in January, or when hawks fly over head. It is the sound of deer in the grass, or the distant bark of a fox or howl of a coyote. It is the sound of the breeze. The DEIR, section 4.8, states that prevailing background noise is 59 decibels, which was allegedly measured at the corner of Circle Oaks Drive and 121. Six or seven of the 179 homes in Circle Oaks are in the vicinity of this corner. Most of the homes, in fact almost every home, sits in a place where 33 decibels is an accurate measurement, which is why we hired a sound engineer. On this basis, the DEIR invokes misleading information to prove that Walt Ranch construction and operation would be consistent with current conditions. A few illustrations:

1. I monitored traffic with a decibel meter halfway up Circle Oaks Drive on two weeknight evenings at 5:30pm. This location is typical and thoroughly representative of the neighborhood. At 5:30-6pm, it is the heat of rush hour. 5 cars went by – four uphill and one downhill, and increased noise from whisper quiet to 65 decibels for around 2 seconds at a time. On 121, at the first pullout when driving east out of Napa, a spot where uphill speeds are 25, I counted off 45 cars and pickups going home from work – a parade we'll hear every morning and every night. The cars and trucks raised the average background decibel level to 56-74 decibels. Aside from the ignored fact that this level of traffic transforms a residential street into a major commuting road (something it is not built for), this represents a major disruption of noise and commotion.
2. For two months I have monitored truck traffic past my home. I live at the top of Circle Oaks Drive, about 50 feet from the road. Currently 3-5 large trucks per *week* travel uphill past my home. Yes, they are a racket – about 85-90 decibels. I work at home and must close my windows if I am on the phone while they pass. The DEIR does not state how many heavy trucks will travel past our homes per *day*, let alone per week, during construction, harvest, while they're hauling down the carcasses of the forest clear cut, or while Napa County is hauling up water because the wells ran dry. Based on my count of trucks for recent projects such as the Hwy 121 bridge rebuild just to the North of us, we will undoubtedly hear more like 10 to 30 trucks per day. How could Hall claim anything less on a project of this scope? The disturbance will be enormous.
3. The unceasing drone of chain saws and bulldozers clear cutting the watershed forest right behind us, the constant grind of gravel mining and crushers, the dynamite blasting, and in four years, after that has ceased, the drone of vineyard fans in the middle of the night – these will replace the sound of nature – birds and the breeze during the day, crickets and coyotes at night. The prevailing background noise will become that of a quarry, logging camp, industrial construction site, and finally a factory farm.

How loud is all this? The DEIR clearly states that the prevailing background noise will increase to approximately 62 decibels, 5 or 6 days per week – the level of someone speaking loudly in the same room, and that’s not counting the dynamite blasts and heavy trucks.

What does this mean? It simply means that it will get much louder where I live. What’s loudness mean? Loudness is a psychological and physical response to sound. It is agreed that a 10dB increase equals a perceived doubling in loudness. Increasing prevailing noise from 33 to 43 is twice as loud. 43 to 53 is twice again. 53 to 62 is just about twice again. Walt Ranch would be about 6X as loud as current. Imagine that everything you do is peppered with industrial noises as loud as a speaking voice in close vicinity, all day, 5 or 6 days per week. This isn’t just for a week or a month, but for 4 years of construction. And into perpetuity once it starts operation.

What are the impacts of noise? The DEIR specifically identifies the detrimental effects of Walt Ranch’s noise pollution as annoyance, nuisance, dissatisfaction, interference with speech, sleep and learning, and physiological effects such as hearing loss and sudden startling.

How does Hall propose to remediate these things? They don’t. They assert their right to create this chaos by invoking existing ordinances to claim a “right to farm” where no farm now exists. To justify this claim, the DEIR states that “The Proposed Project would not cause a substantial permanent increase in ambient noise levels above what is in character of the surroundings, and would not cause a substantial temporary or periodic increase in ambient noise levels that would exceed any applicable standards or ordinances.”

Hall’s assertion of “no substantial increases” is a complete fabrication. Furthermore, the surrounding uses are *residential*, not construction, not industrial agriculture. The current prevailing background noise is 33 decibels, not 59 decibels. I challenge any claim to *any right* that is based on a fabrication of this nature. To what standards does Napa County hold development applicants for truthfulness and transparency? Please explain to us how Hall meets these standards, and why a disruption of this magnitude isn’t prohibited rather than honored as a right?

The increase from 33 decibels to 62 decibels is effectively a 6X increase in ambient noise – permanent during four years of construction; temporary or periodic during operation. A 6X increase in sound isn’t a little bit. It’s grand scale noise pollution with all the attendant environmental and health effects that accompany it. Under what authority does a private business have to introduce these unhealthy environmental violations at the admitted expense, personal and monetary, of the health and quality of life of the close to 1000 people who live in its proximity?

Ms. Cahill, I strenuously oppose this project and I urge you and your team to consider these factors during your evaluation of the DEIR. How could Hall possibly remediate noise pollution other than to silence the Walt Ranch activities, or to have Napa County prevent it in the first place?

Sincerely,



Peter Krammer
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