



Division of Parks and Recreation
NC Department of Natural and Cultural Resources

Governor Roy Cooper

Secretary D. Reid Wilson

February 12, 2021

Brian Wrenn, Director
NC DEQ/Division of Energy, Mineral & Land Resources
Via email: Brian.wrenn@ncdenr.gov

Re: Expand Wake Stone Triangle Quarry, Odd Fellows Tract adjacent to William B. Umstead State Park, Raleigh, Wake County, GS 20-0841

Dear Mr. Wrenn:

After further evaluation of the permit modification, the Division of Parks and Recreation (DPR) requests that the Department of Environmental Quality (DEQ) deny the permit modification based on its significant negative impacts on Umstead State Park and other publicly owned greenways adjacent to the park, as allowed by N.C. Gen. Stat. § 74-51(d)(5) (allowing denial of a permit upon finding “[t]hat the operation will have a significantly adverse effect on the purposes of a publicly owned park, forest or recreation area”). This conclusion is consistent with the 1980 denial of the mining permit application by the then Department of Natural Resources and Community Development (NRCD) due to the proposed combined effects to the park of noise, sedimentation, dust, traffic, and blasting vibrations associated with the then-proposed quarry.

Our May 8, 2020 letter on this topic details much of our rationale for requesting denial of the permit modification. The issues are summarized below and include noise, sedimentation and water quality, dust and air quality, traffic, habitat loss, blasting vibrations, and park expansion. DPR does not believe mitigation efforts could eliminate these concerns. In addition to the significant negative effects discussed in that letter and below, the delayed closure of the existing quarry and potential transfer of the property to the park would represent a significant economic cost to DPR. Renewing the permit and preventing transfer denies DPR and the State this valuable property in the middle of a rapidly growing metropolitan area.

DPR asks that DEQ also consider the many changes since the initial permit approval almost 40 years ago, including increased demand for outdoor recreation, construction of additional greenways adjacent to the park, and loss of habitat through increased urbanization in the vicinity of the park. DPR believes denial of the permit will greatly benefit Umstead Park and protect the natural resources of the State and the citizens who gain enjoyment from these resources.

Noise Impacts

As visitors come to a state park, there is an expectation of tranquility and quiet not afforded them where they live, even at a more urban park like Umstead Park. Additional noise from the proposed quarry expansion site will degrade this tranquility to a level that would harm park visitors' experiences.

Sedimentation/Water Quality

Increased sedimentation from the proposed quarry will harm the downstream water quality of Crabtree Creek in the park. Sand and finer grained sediments, including silts and clays, degrade stream habitats, and can reduce sunlight and harm aquatic plant and animal species. The extent of sedimentation in a stream is one of the significant indicators of diversity of macroinvertebrates which are an indicator of stream health.

Dust/Air Quality

Dust and fine particles degrade air quality, potentially damaging public health. DPR is concerned that the cumulative impacts on air quality from the new quarry have not been adequately assessed. Deforestation and the heavy machinery that would be used in the proposed quarry expansion will negatively impact air quality in the region. As the park and connecting greenways have become more popular there is a concern that blasting dust and other airborne pollutants from traffic and mining operations will harm the health of many park users.

Truck Traffic

Umstead Park shares an entrance with the current Wake Stone quarry off the Harrison Avenue access to the park. This location is a primary entrance location for the park and would also continue to serve as the primary location of trucks entering and leaving the quarry. Over the years there have been several challenges associated with the shared access point. Truck traffic is constant when the quarry is operating and has resulted in conflicts with visitors, especially those biking into the park. Trucks leaving the quarry often cross the center line due to the tight turning radius, posing a safety issue. In addition, truck traffic is likely to increase at this already crowded intersection, exacerbating safety issues, as timber is removed from the site, the bridge is built, and associated quarry activities at the new site ramp up.

Blasting

In addition to the noise impacts from blasting previously discussed, blasting vibrations could also negatively affect both park visitors and facilities. Significant vibrations could mar the very peace and quiet that visitors come to Umstead Park to experience, and each year many thousands of people enjoy the Reedy Creek Multi-Use Trail adjacent to the proposed site. Vibrations could also damage buildings including park staff residences. These problems will have an adverse impact on the park.

Loss of Wildlife Corridors

Habitat loss and fragmentation is the largest contributor to biodiversity loss on the planet. The proposed permit modification would permanently fragment healthy wildlife habitat directly on the park's border.

Park Expansion

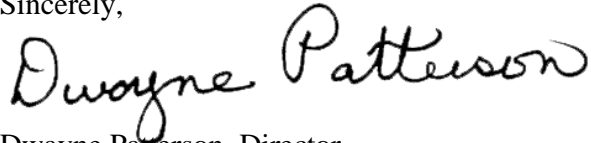
Because population growth in the Triangle region and visitation to Umstead State Park are rapidly increasing, the park's master plan calls for expansion of the park through land acquisition. Approval of the permit modification will cause a significant delay, by 30 years or more, in the

potential transfer of the existing quarry property to the park, which would limit the park's ability to meet increased public demand in the meantime.

In conclusion, approval of a permit to expand the quarry will degrade Umstead State Park and represent a significant lost opportunity for the park, our Division, and the natural resources of our State. The North Carolina Division of Parks and Recreation requests that Department of Environmental Quality deny the modification.

DPR appreciates the opportunity to provide these comments on the proposed permit modification. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Dwayne Patterson". The signature is written in a cursive, flowing style.

Dwayne Patterson, Director
North Carolina Division of Parks and Recreation

cc: Reid Wilson, Secretary, NCDNCR
Brian Strong, Deputy Director of Planning and Natural Resources, DPR
John Nicholson, Chief Deputy Secretary, DEQ
Sheila Holman, Assistant Secretary for Environment, DEQ