

Wehner, Judy

From: Wrenn, Brian L
Sent: Thursday, May 07, 2020 4:00 PM
To: Wehner, Judy; Miller, David; Vinson, Toby
Subject: FW: Wake Stone Triangle Quarry Expansion
Attachments: Wake Stone Triangle Quarry Permit 5 7 2020 final.pdf

Thanks,

Brian Wrenn
919-707-9222 (O)
919-218-7536 (M)

Based on the current guidance to minimize the spread of COVID-19, the Department of Environmental Quality has adjusted operations to protect the health and safety of the staff and public. Many employees are working remotely or are on staggered shifts. To accommodate these staffing changes, all DEQ office locations are limiting public access to appointments only. Please check with the appropriate staff before visiting our offices, as we may be able to handle your requests by phone or email. We appreciate your patience as we continue to serve the public during this challenging time.

From: Gledhill-earley, Renee <renee.gledhill-earley@ncdcr.gov>
Sent: Thursday, May 7, 2020 3:58 PM
To: Wrenn, Brian L <brian.wrenn@ncdenr.gov>
Cc: Wilson, Reid <Reid.Wilson@ncdcr.gov>; Cherry, Kevin <kevin.cherry@ncdcr.gov>; Patterson, Dwayne <dwayne.patterson@ncparks.gov>; Bartos, Ramona <Ramona.Bartos@ncdcr.gov>
Subject: Wake Stone Triangle Quarry Expansion

Mr. Wrenn:
Attached are our comments on the proposed mining permit modification.
Please enter them along with the other comments due by May 8, 2020.
Thank you.

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Renee Gledhill-Earley
Environmental Review Coordinator
State Historic Preservation Office
109 E Jones St MSC 4617 Raleigh, NC 27699
919 814 6579 office

****COVID-19 has changed the way we accept non-electronic mail . See below.****



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and may be disclosed to third parties.

Please Note:

Requests for project review or responses to our review comments should be sent to our Environmental Review mailbox at environmental.review@ncdcr.gov Otherwise, I will have to return your request and ask that you send it to the proper mailbox.

This will cause delays in your project. Information on email project submittal is at: <https://www.ncdcr.gov/state-historic-preservation-office/environmental-review/environmental-review-submission-process-0>

Couriered items from USPS, FedEx, UPS AND hand delivered items will only be accepted at the loading bay door located on Wilmington St. between the hours of 8AM-Noon M-F. Applicants should knock/ring the door bell at the loading bay entrance door. If no one answers they can leave the package on top of the bin to the side of the door, then email me so that I can let staff know. Any packages left outside the stated hours are left at the deliverer's responsibility. We CANNOT be responsible for them. Custodial staff will NOT accept ANY deliveries.



**North Carolina Department of Natural and Cultural Resources
State Historic Preservation Office**

Ramona M. Bartos, Administrator

Governor Roy Cooper
Secretary Susi H. Hamilton

Office of Archives and History
Deputy Secretary Kevin Cherry

May 7, 2020

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

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

Thank you for providing the April 8, 2020, mining permit modification application for the above-referenced expansion project. We have reviewed the application and offer the following comments.

As noted in the application, Wake Stone Corporation is aware of the public concern raised by its proposed expansion immediately adjacent to William B. Umstead State Park, which was listed in the National Register of Historic Places (NRHP) in 1995 as the Crabtree Creek Recreational Demonstration Area. We, too, are concerned by the proposal as we believe it may adversely affect the characteristics that made and continue to make the park eligible for National Register listing.

The Crabtree Creek Recreational Demonstration Area is an important example of a Depression-era public works project, the purpose of which was to convert exhausted farmland into an outdoor recreational park. Significant for its architecture, landscape architecture, and conservation management techniques, the 5,337-acre park was one of two Recreational Demonstration Areas established in North Carolina by the federal government in the 1930s.

The genesis of the park occurred in 1934 when the Resettlement Administration began assembling tracts of farmland for reclamation and reforestation. Following the land acquisition, the Civilian Conservation Corps (CCC) and the Works Progress Administration took the lead on next steps. Under the supervision of architects, landscape architects, foresters, and engineers, young CCC recruits labored to build rustic-style group camps, bridges, roads, trails and picnic areas. They also planted forests, dammed creeks to create lakes, and instituted land management practices to reverse the land erosion caused by years of poor agricultural practices. The result of this effort is North Carolina's premier collection of New Deal rustic architecture and landscape architecture. The majority of the park's natural landscape features, which include streams, drainage areas, ridges, and forest, remain essentially unchanged. With over thirty miles of bridle/bicycle trails and hiking paths, the park is one of the most visited in North Carolina and offers a nature-based retreat in one of the fastest developing counties in the state.

Given its historical significance as a recreational area centered on restoration of the landscape through landscape design and land-management as well as a rustic retreat from increasing urbanization, we believe that the following concerns need to be more thoroughly addressed.

Tree clearing of 59.3 acres of trees and removal using Reedy Creek Road.

- Please address the noise and dust this activity will create as well as the safety issues raised for hikers using the road as a major access point to Umstead Park.

Construction of fifteen foot (15') tall vegetative berms set fifty feet (50') behind the permit limit boundary.

- We understand these berms are supposed to provide a visual and noise buffer for the park as well as to discourage public access. However, it will take some time to build the berms and decades for them to be vegetated sufficiently to serve this purpose. In the meanwhile, the bare or nearly bare berms will be visual landscape elements that are incompatible with the very reason for creation of the park as a forested recreation area.
- The applicant anticipates that these berms will also mitigate the increased noise of the quarry closer to the park. Please substantiate this claim.
- It is stated that, if necessary, a security fence eight feet (8'), topped with three strands of bobbied-wire, will be installed along the perimeter by either Wake Stone or the RDU Airport Authority. We believe that a fence is completely out of keeping with the landscape of the park and its recreational character and significance as set forth in the National Register listing. Please offer other options.

Lighting of the quarry is not thoroughly addressed.

- Please provide documentation that there will be *no* increase of night lighting that can adversely affect the night-time experience of the park as a rustic retreat.

In addition to the above comments that relate to potential adverse effects upon the National Register-listed historic property, we offer the following on the potential archaeological resources.

There are no recorded archaeological sites within the boundaries of the mine expansion project area; however, this area has never been systematically surveyed to determine the location or significance of archaeological resources. Previously recorded archaeological sites within a half mile of the project area suggest that landforms associated with Crabtree Creek and its tributaries have a high probability for containing pre-colonial American Indian archaeological sites associated with quarrying gravels from stream deposits. In addition, the 1914 Wake County soil survey map shows one structure in the mine expansion area, and archaeological remains associated with this structure may be present in the parcel.

We believe that a comprehensive archaeological survey conducted by an experienced archaeologist is required *before* further consideration of issuance of the necessary state permits for the quarry's operation. The purpose of this survey will be to identify and evaluate the significance of archaeological sites that may be damaged or destroyed by the proposed project.

Please note that our office now requests consultation with the Office of State Archaeology Review Archaeologist to discuss appropriate field methodologies prior to the archaeological field investigation. A list of archaeological consultants who have conducted or expressed an interest in contract work in North Carolina is available at <https://archaeology.ncdcr.gov/archaeological-consultant-list>. The archaeologists listed, or any other experienced archaeologist, may be contacted to conduct the recommended survey.

One paper and one digital copy of all archaeological reports addressing work in the project area, as well as one digital copy of the North Carolina site form for each site recorded, should be forwarded to the Office of State Archaeology through this office for review and comment as soon as they are available and in advance

of any construction or ground disturbance activities. Office of State Archaeology report guidelines are available at https://files.nc.gov/dncr-arch/OSA_Guidelines_Dec2017.pdf.

An adverse effect to the National Register-listed property arising from the activities proposed under the requested permit could trigger referral to the North Carolina Historical Commission for further review under NC 121-12(a).

In short, industrial mining is generally not conducive to the support and promotion of *or* compatible with the very elements that led William B. Umstead State Park to being listed on the National Register of Historic Places: land restoration through landscape design and outdoor recreation. For this reason, expansion of quarry activity is of great concern to the State Historic Preservation Office and Office of State Archaeology. In addition, there is a high degree of probability that the potential impact area contains undiscovered prehistoric American Indian archaeological resources that the proposed activities could threaten. For these reasons, we need and request additional information from the applicant concerning how it plans to address these issues before our offices can then provide final comments upon the permit request.

Thank you for your cooperation and consideration. If you have questions concerning the above comments made under Executive Order XVI and NC GS 121-12(a), please contact Renee Gledhill-Earley, Environmental Review Coordinator, at 919-814-6579 or environmental.review@ncdcr.gov. In all future communication concerning this project, please cite the above-referenced tracking number.

Sincerely yours,



Ramona M. Bartos, Deputy
State Historic Preservation Officer

cc: Reid Wilson, Chief Deputy Secretary reid.wilson@ncdcr.gov
Kevin Cherry, Deputy Secretary kevin.cherry@ncdcr.gov
Dwayne Patterson, State Parks dwayne.patterson@ncparks.gov