



Wake Stone Mining Permit 92-10 and its impacts William B Umstead State Park and on Protected Buffers required by the Permit

Buffers have been violated and DEQ has not taken action to require Mitigation, despite repeated complaints - significant adverse effects have now crossed over from the Buffers into William B Umstead State Park
The result is flooded parkland and dead mature trees

July 22, 2018, Wake Stone Discharge into Umstead State Park and Crabtree Creek



Outline of this Presentation

- What was Required by the Mining Commission and the Mining Permit
- What really Happened

Buffers were Violated

Streams were Impacted with Sediment coating the streambed

Sunset Clause was revoked based on incomplete and misleading data

- It will get worse – Expansion request further erodes buffers
- More bad Changes in the Expansion
- Conclusion – There is a Disconnect between the DEQ Mission and the reality
 - Director Conrad was right in 1980 to deny the Quarry as the significant adverse effects he predicted are now a reality. The Expansion Request will increase significant adverse impacts on the Park

Comparison of Mining Commission Final Decision and the Original Permit - Buffers

Mining Commission Final Decision

April 3 1981

Condition No. 3 - Buffer Zone Plan

1. The extent of the completely undisturbed buffer zone to be maintained between the park boundary during the 10 year permit shall be as indicated on the revised plan and modified by Exceptions 2, 3, and 4 listed on Page 2 of Wake Stone Corporation's memorandum of March 10, 1981, except all of the area north of the ten-year buffer line shall be left as a natural buffer zone and not be developed or altered for commercial purposes.

In the Matter of Denial of)
Permit Application of the) Amendment to the
Wake Stone Corporation) Final Decision

The 250' buffer area shown on the northern boundary and the 100' buffer area on the eastern boundary of Wake Stone's property is considered by the Commission the permanent buffer zone.

Permit as Issued May 13, 1981

3. Buffer Zones

The dotted line labelled as buffer along the northern boundary and along the eastern boundary is the permanent buffer as designated by the Mining Commission. (Site plan dated March 10, 1981)

An undisturbed buffer of existing natural vegetation shall be maintained between the mining disturbance and Park property as indicated by the "10 year buffer" shown on the site plan dated March 10, 1981.

An undisturbed buffer zone of existing natural vegetation shall also be maintained between the top edge of the bank of Crabtree Creek and any mining disturbance within the 10 year permit area. The buffer zone shall be of sufficient width to prevent offsite sedimentation and to preserve the integrity of the natural watercourse. In any event, the buffer will meet U.S. Corps of Engineers requirements for Crabtree Creek Watershed.

The only exceptions to these undisturbed buffers of natural vegetation are:

- A. The construction of berms as approved by the Department for visual and noise screening.
- B. The installation of drainage and sedimentation controls to protect the Crabtree Creek.
- C. Such crossings as may be necessary in future years to accommodate the installation of utilities.

Comparison of Mining Commission Final Decision and the Original Permit – Berms

Blue is exact copy, green is added

Mining Commission Final Decision

Condition No. 4 - Construction of Berms

1. A vegetated earthen berm shall be constructed between the Wake Stone Corporation plant and the western boundary of the park as shown on Wake Stone Corporation's revised site plan.
2. Berm dimensions shall be no less than indicated on Wake Stone Corporation's revised site plan and may be higher and longer than shown, except the berm shall not encroach on the permanent buffer zone.
3. The side slopes of the berm shall be graded to a stable grade of 2 horizontal to 1 vertical grade or flatter and revegetated on the sides and top with grasses and evergreen trees. The toe of the berm shall not encroach on the park property boundary and shall be at least 50 feet from the boundary.
4. Other berms may be required as mining progresses to reduce the noise and visual impact upon the quarry.

Permit as Issued

5. Visual Screening

The operation shall be situated to optimize natural screening of the operation from public view from Interstate 40 and the Park property. The visual screening plan shall include maintaining undisturbed buffer areas of natural vegetation as shown on the site plan dated March 10, 1981. Additionally, a vegetated earthen berm shall be constructed east of the processing plant and stock-pile area as shown on the revised site plan. Visual screening such as vegetated earthen berms and/or evergreen trees shall be placed as necessary to supplement natural screening.

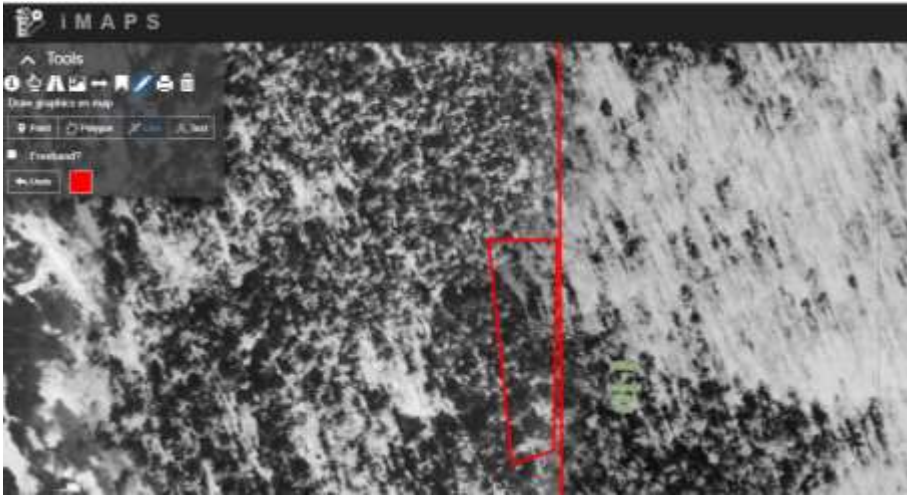
Construction of Berms

- A. A vegetated earthen berm shall be constructed between the Wake Stone Corporation plant and the western boundary of the Park as shown on Wake Stone Corporation's site plan dated March 10, 1981.
- B. Berm dimensions shall be no less than indicated on Wake Stone Corporation's site plan dated March 10, 1981 and may be higher and longer than shown.
- C. The side slopes of the berm shall be graded to a stable grade or 2 horizontal to 1 vertical grade or flatter and revegetated on the sides and top with grasses and evergreen trees. The toe of the berm shall not encroach on the park property boundary and shall be at least 50 feet from the boundary. The alignment of the berm may vary from the approved site plan as is necessary to provide the 50 feet of undisturbed land between the park boundary and the toe of the berm and assuring an acceptable angle of repose for the slope of the berm.
- D. Other berms may be required as mining progresses to reduce the noise and visual impact upon the park.

1981 Site Plan
referenced in the
1981 Permit 92-10



In the First Year of the Permit Wake Stone Violated the East Buffer clearing the 50 foot buffer within 15 feet of the park



1981 aerial of
Park quarry
boundary-
forested

50 feet undisturbed buffer between the park boundary and the toe of the berm was violated in the first few years of the permit. DEMLR failed to enforce the requirement and failed to issue a violation of the permit to document the encroachment. Consequently Wake Stone asserts incorrectly they have never violated the conditions of the permit, because DEMLR never charged them with a violation.



1988 aerial confirms
clearing within 14 feet
of the park boundary,
Blue Line shows the
required 50 foot
buffer cleared

Buffer Complaints to DEMLR/DEQ that have been Reported with no notice of Violation issued or required Mitigation

April 21, 1982 In the first year of the Permit - State Parks reports 50 foot buffer violated and stagnant water flooding buffer and crossing into State Park which was to be protected by the violated buffer.



North Carolina Department of Natural
Resources & Community Development

James B. Hunt, Jr., Governor

Joseph W. Grimsley, Secretary

DIVISION OF
PARKS & RECREATION

James S. Stevens, Jr., Director

Telephone 919 733-4181

April 21, 1982

RECEIVED

APR 23 1982

LAND QUALITY SECTION

MEMORANDUM

TO: Mr. Stephen G. Conrad, Director
Division of Land Resources

FROM: James S. Stevens, Jr., Director
Division of Parks and Recreation

SUBJECT: Wake Stone Quarry Permit Violation

It has come to my attention that a condition related to a Wake Stone permit violation in the berm and buffer area adjacent to Wm. B. Umstead State Park is causing standing water to encroach on State property. Specifically, grading within the 50' buffer area between the toe of the berm and the park boundary is causing stagnant water to pond within the buffer area. In addition, due to recent rains, this water is encroaching on park property.

We hope this situation will be remedied without any additional vegetation removal in the buffer area.

Thank you for your attention to this matter.

§ 74-58. Suspension or revocation of permit.

(a) Whenever the Department shall have reason to believe that a violation of (i) this Article, (ii) any rules adopted under this Article, or (iii) the terms and conditions of a permit, including the approved reclamation plan, has taken place, it shall serve written notice of the apparent violation upon the operator, specifying the facts constituting the apparent violation and informing the operator of the operator's right to an informal conference with the Department. The date for an informal conference shall be not less than



Tools

1981 Forested Undisturbed site

Maps



Street Map



Aerials

☒ Labels

1981

☐ Blend

Click to start drawing

Overview





1988
Overlay of
1988 Aerial
photo and
1981
Approved
site plan
shows 3
Areas of
Buffer
violation

Rough estimated Overlay of the 1981 Site map showing protected 10 year buffer area North of the line, and 1988 IMAPS photo showing three large encroachments into the protected buffer.

1981 and 1986 Permit required an UNDISTURBED buffer zone of existing natural vegetation between the top edge of bank of Crabtree Creek and any mining disturbance, North of the 10 year buffer line.

On the east park boundary there was to be 50 foot undisturbed land between park boundary and the toe of the berm, this area was cleared within 10 feet of the boundary.

Tools

Maps



Street Map



Aerials

☒ Labels

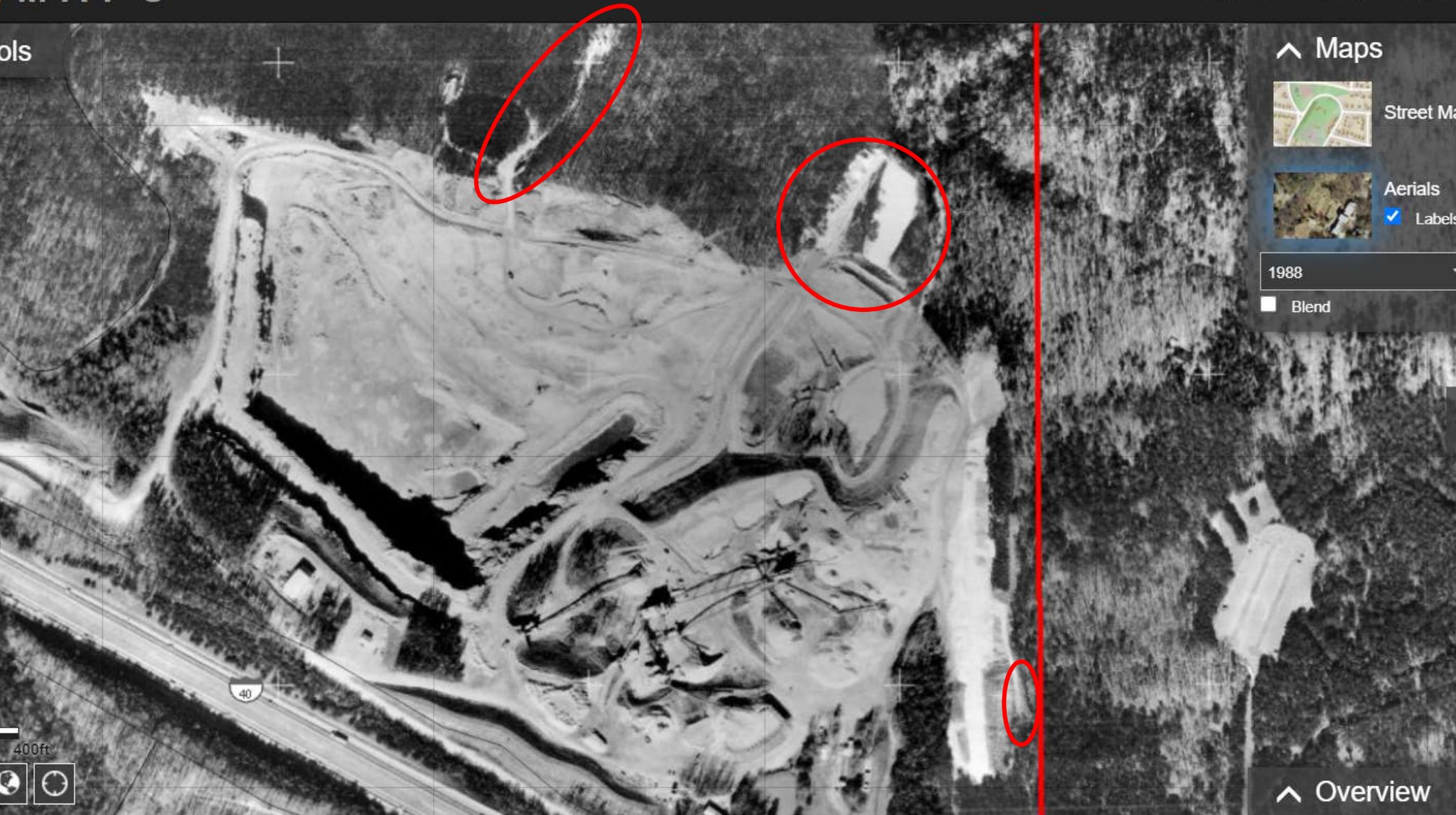
1988

☐ Blend

1988 Aerial
Photo of the
Site



Overview



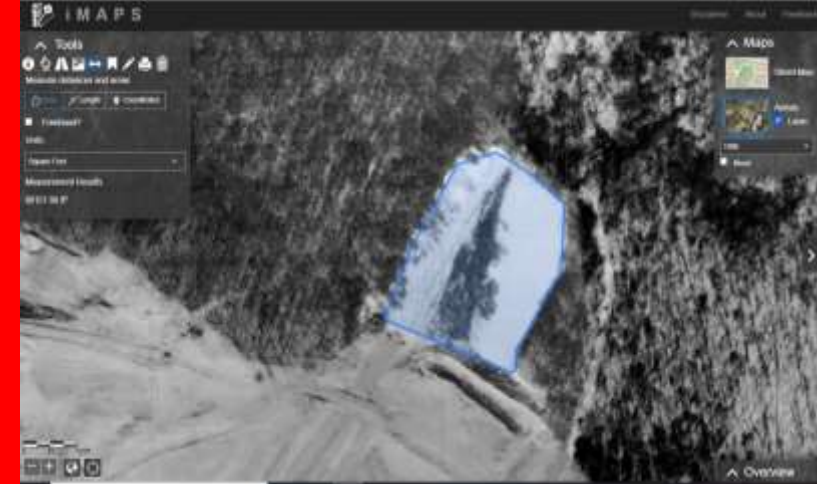
1988 Buffer Violations on North Buffer and East Buffer, Pond was latter approved after Wake Stone violated buffer, East was encroachment of 50 foot do not disturbed buffer when they built a berm that was to be located to leave 50 feet undisturbed buffer next to the Park, Wake Stone cleared 40 of the 50 feet.

In the first 5 years of the 1981 Permit Wake Stone had violated the Northern permanent buffer

required by the both the Mining commission April 3

1981 Decision and the May 13, 1981 Permit conditions, which required an

UNDISTURBED BUFFER of EXISTING NATURAL VEGITATION.



Mining Commission Final Decision
issued April 3, 1981 required

Condition No. 3 - Buffer Zone Plan

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the park boundary during the 10 year permit shall be as indicated on the

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Wake Stone Corporation's memorandum of March 10, 1981, except all of the

area north of the ten-year buffer line shall be left as a natural buffer

zone and not be developed or altered for commercial purposes.

Department of Natural Resources and Community Development

Division of Parks and Recreation

512 North Salisbury Street • Raleigh, North Carolina 27611

James G. Martin, Governor
S. Thomas Rhodes, Secretary

January 21, 1986

Dr. William W. Davis
Director

MEMORANDUM

TO: Mr. Stephen G. Conrad, Director
Division of Land Resources

FROM: William W. Davis, Ph.D. *[Signature]*

SUBJECT: Proposed Cary Quarry Dam Construction

The Division of Parks and Recreation has further reviewed the request by the Wake Stone Corporation for an amendment to their mining permit. Approval of this amendment would permit the construction of a dam that would extend beyond the current boundary delineated by the 10 year permit. We understand that Wake Stone, without written authorization, has cleared the land necessary to allow construction of this dam.

After the violation and clearing Wake Stone obtained a DEQ permit to encroach this protected buffer, but the Violation occurred before the Permit that allowed it. It was opposed by State Parks and only done so Wake Stone gained as they could have offered land in their site to do the same without encroachment of the protected buffer.

And Yes... they also Violated the Buffers on the East of the site

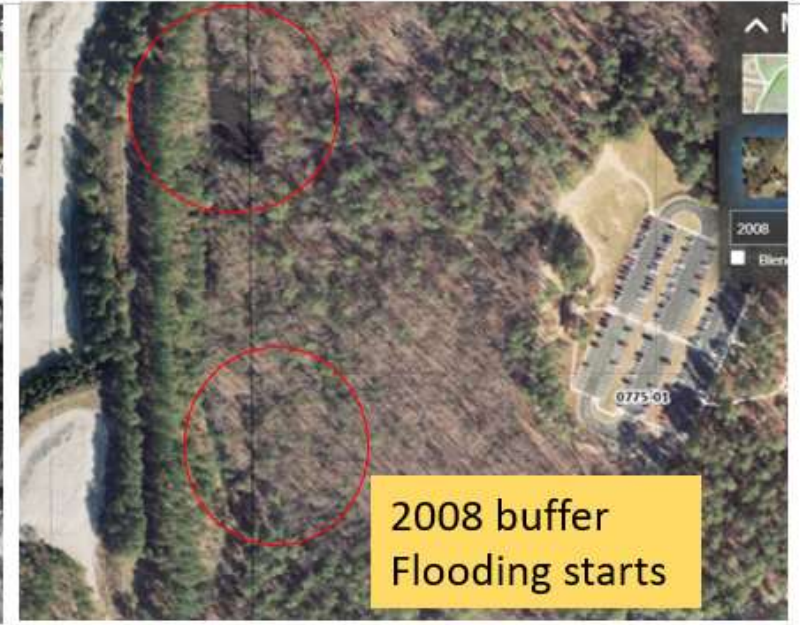
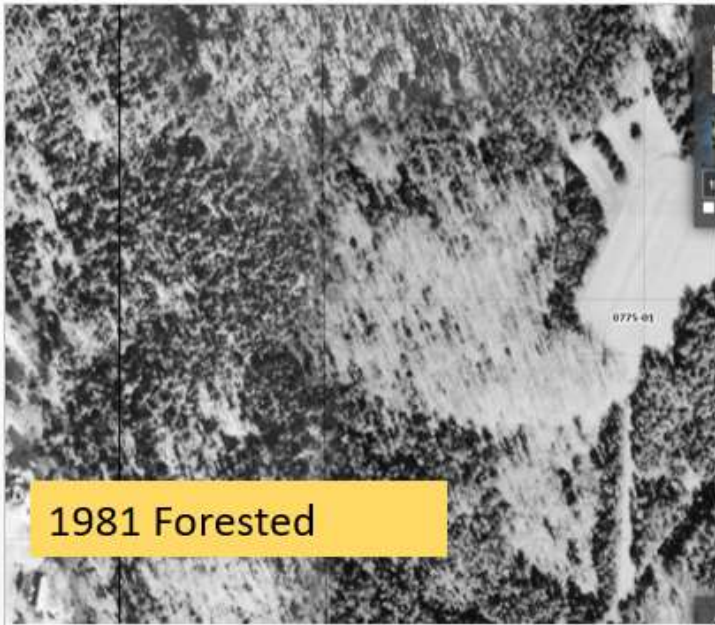
In the First year of the permit, 1982 Wake Stone Violated the 50 foot protected buffer during the construction of the Berm, They cleared within 15 feet of the Park Boundary

In 1982 State Parks objected to the buffer violation and reported flooding in the area that had filled the buffer and crossed into the park

Over the next 38 years the 100 foot protected buffer was flooded in two areas, killing all trees that were to be protected,

In recent years the flooding has crossed into the State park flooding parkland and Killing trees in the park.

Despite many complaints over the last 40 years, DEQ never issued a Violation of the permit, or required mediation to repair the damages



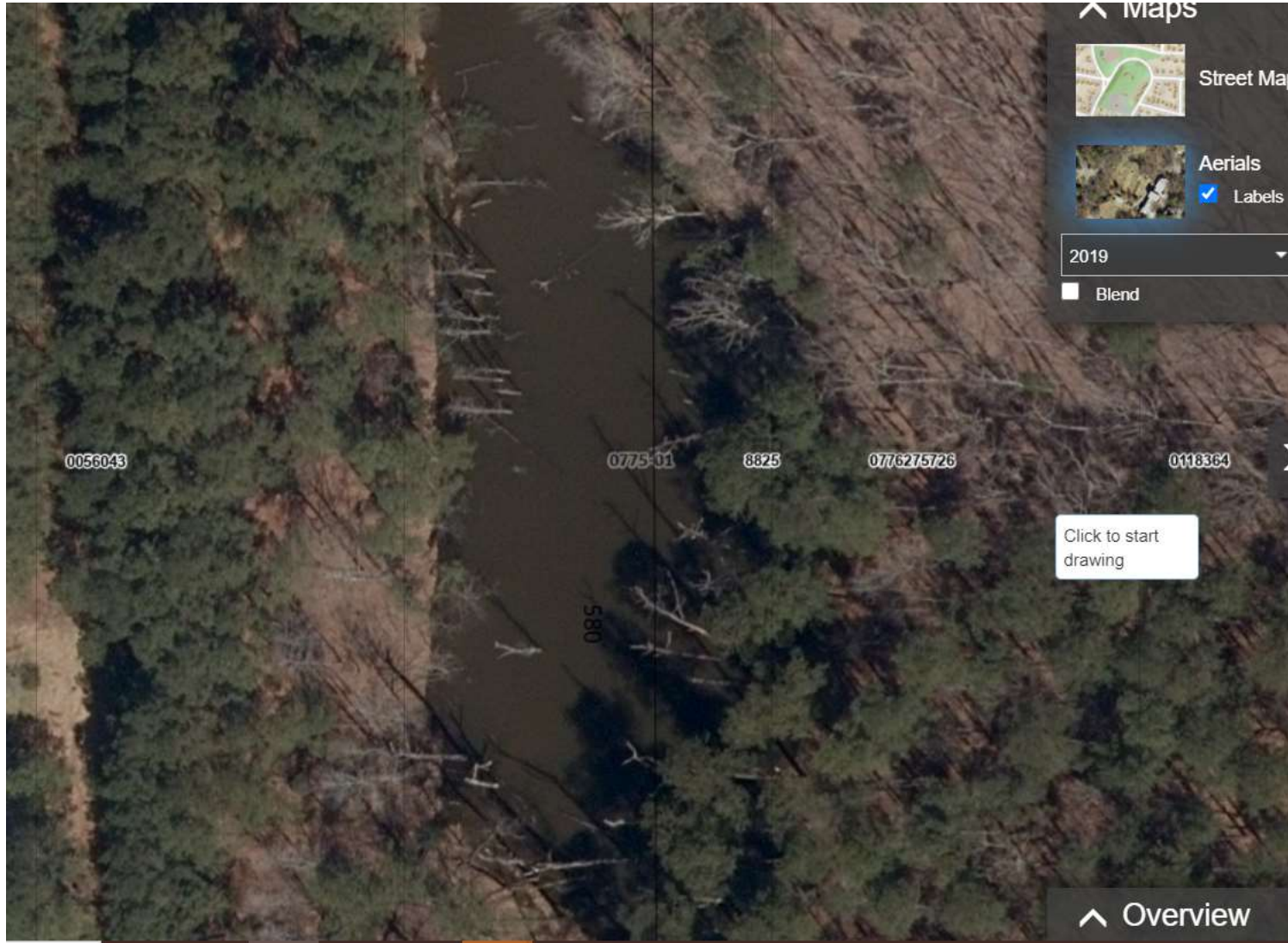


Result of discharge into the buffer

80 feet of 100 foot undisturbed buffer has been flooded

And the flooding has crossed over the park boundary flooding 60 feet into park property, killing all the trees in the flooded zone.

The damage and encroachment is continuing to grow over time



Here a second pond has been created in the undisturbed protected buffer, flooding 80 of the 100 foot buffer, and the flooding crosses into the park property flooding 30 feet into the park, killing all trees flooded

The size of the encroachment continue to grow and DEMLR has responded to complaints saying it is OK, it's the best place for the mine to put the water.

This attitude shows no commitment by current DEMLR staff to enforce the buffers required by the permit.

Violations on the West side, too

State of North Carolina
Department of Environment, Health, and Natural Resources
Raleigh Regional Office

James C. Martin, Governor
William W. Cobey, Jr., Secretary

Edmond John Maguire
Regional Manager

DIVISION OF LAND RESOURCES

January 13, 1992

NOTICE OF MINE PERMIT DEFICIENCIES

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Wake Stone Corp.
P.O. Box 190
Knightdale, NC 27545
ATTN: Mr. John R. Bratton

RE: Triangle (Cary) Quarry (92-10)
Wake County

Dear Mr. Bratton:

This is to document our observations during the inspection on January 8, 1992 following your report of the rock slide into Crabtree Creek at the west end of the pit.

As you know, it was determined that deficiencies exist with respect to one or more of the conditions contained in your mining permit. The applicable conditions and our observations are as follows:

(3.B. and E.) The undisturbed buffer along Crabtree Creek in the area affected by the rock slide has not been sufficient to prevent deposition of material in the watercourse. The material extended approximately 90% across the width of the main channel.

3800 Barrett Drive, Suite 101 • Raleigh, N.C. 27609
Telephone (919) 733-2314 • FAX Number (919) 733-7072

The Buffer on the West of the site was violated on January 7, 1992 when Wake Stone blasted too close to Crabtree Creek, destroying the undisturbed buffer and blocking 90% of the waterway.





Tools



Measure distances and areas



Freehand?

Units

Feet

Measurement Results

101.73 ft

Maps



Street Map



Aerials

Labels

1999

Blend



Overview

West Buffer Violation
1992 Blast too close to Stream destroyed natural buffer and filled Steam 90% blocking channel, red shape is buffer 7 years later still not revegetated, and blue line shows 100 feet from top of bank

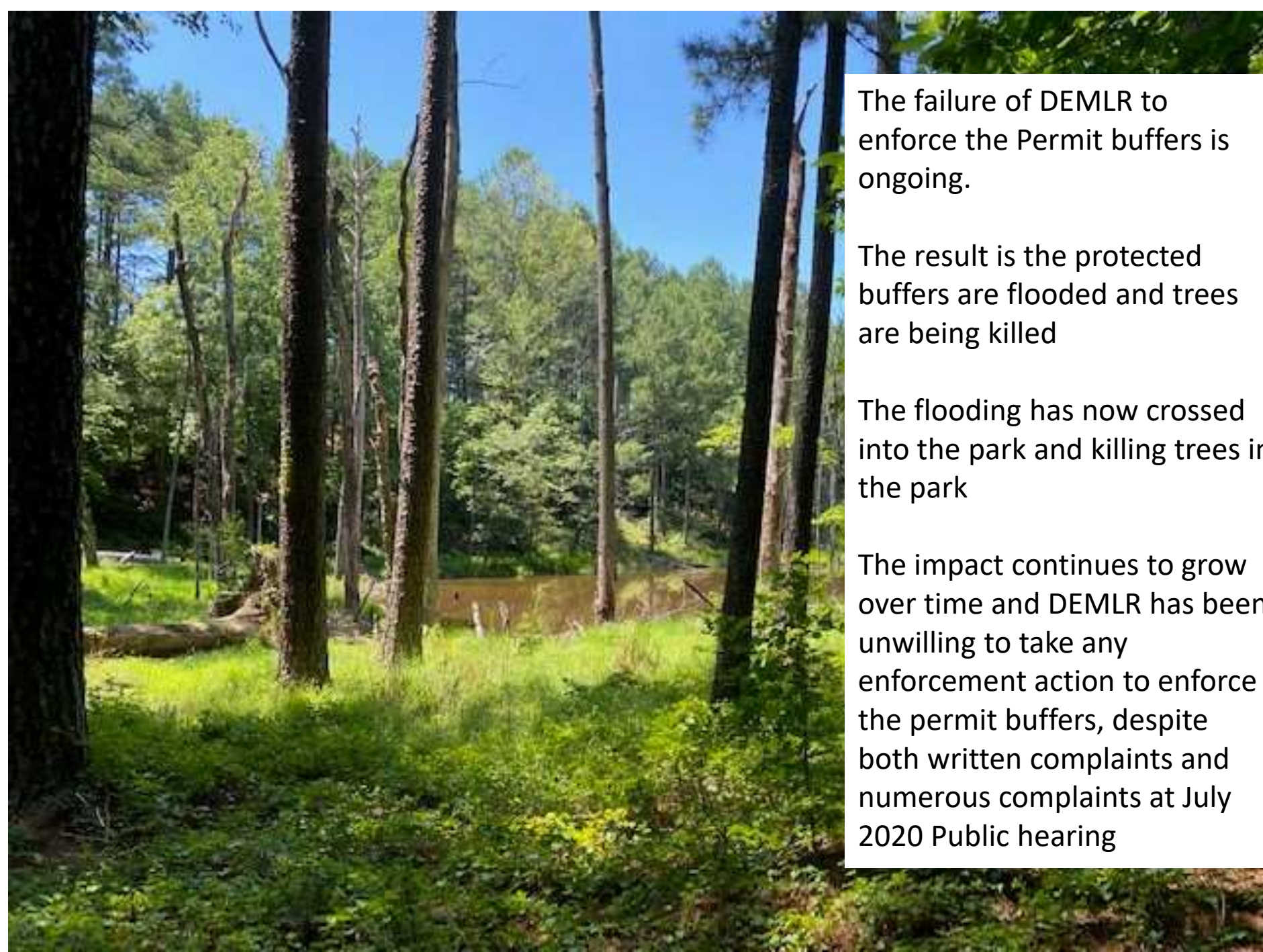
Conclusion

The Buffers in the Permit have never been Enforced

Director Conrad was right the Quarry is an incompatible use adjacent to a state park

The buffers established to protect the park have consistently been violated and DEMLR has looked away, taking no enforcement action to require they be respected.

1. Eastern buffer was cleared within 15 feet of the park boundary despite the permit condition requiring 50 feet undisturbed natural buffer be maintained.
2. Eastern buffer violation is ongoing and growing with two new ponds that exist in the buffer killing all vegetation in the 100 foot protected buffer. This flooding has now crossed into the park and had flooded State park land and all trees in the flooded zone
3. **The undisturbed buffer zone of existing natural vegetation required from top edge of bank of Crabtree Creek, and any mining disturbance shall be of sufficient width to prevent offsite sedimentation and preserve the integrity of the natural watercourse**, was violate on January 7, 1992 when Wake Stone blasted too close to the creek causing a landslide that destroyed the undisturbed buffer and filled 90% of the watercourse. The department issued a deficiencies notice January 13, 1992, but never issued a Notice of Violation and continued to allow Wake stone to blast that close to the creek.
4. It is clear that William B Umstead state park continues to be impacted despite the buffers, it also is clear that when they violate the buffers DEMLR does not enforce them.




The failure of DEMLR to enforce the Permit buffers is ongoing.

The result is the protected buffers are flooded and trees are being killed

The flooding has now crossed into the park and killing trees in the park

The impact continues to grow over time and DEMLR has been unwilling to take any enforcement action to enforce the permit buffers, despite both written complaints and numerous complaints at July 2020 Public hearing



DEMLR / DEQ Never acted to enforce the buffer violation or require the operator to mitigate the damages – the result is significant adverse effects on the park with Flooded parkland and dead trees

Text from the Permit below;

In the event that the Department determines that the permittee or permittee's successor is not complying with the Reclamation Plan or other terms and conditions of this permit, or is failing to achieve the purposes and requirements of the Mining Act, the Department may give the operator written notice of its intent to modify, revoke or suspend the permit, or its intent to modify the Reclamation Plan as incorporated in the permit. The operator shall have right to a hearing at a designated time and place on any proposed modification, revocation or suspension by the Department. Alternatively and in addition to the above, the Department may institute other enforcement procedures authorized by law.

The Permit should be suspended until the Operator fully mitigates the damages to the Park and the protective Buffers, If the Operator cannot or will not mitigate the Damages the permit should be Revoked, according to the terms of the Permit and the Mining Act of 1971

Comparison of Mining Commission Final Decision and the Original Permit – Erosion and Sediment Control

Mining Commission Final Decision

- Topic Not mentioned

Permit as Issued

4. Erosion and Sediment Control

- A. Adequate mechanical barriers including but not limited to diversions, earthen dikes, brush barriers, silt check dams, silt retarding structures, rip rap pits, or ditches shall be provided in the initial stages of any land disturbance to prevent sediment from discharging onto adjacent surface areas or into any lake or natural watercourse in proximity to the affected land.
- B. The existing lakes shall be used to trap sediment from initial mining disturbances. The spillways of the existing lakes shall be further stabilized as necessary to prevent erosion of the spillway from runoff from the affected lands. The embankments of the existing lakes shall be improved if necessary to insure the stability of the embankments.
- C. The angle for graded slopes and fills shall be no greater than the angle which can be retained by vegetative cover or other adequate erosion control measures, structure, or device. In any event, exposed slopes or any excavated channels, the erosion of which may cause offsite damage due to siltation, shall be planted or otherwise provided with ground cover, devices or structures sufficient to restrain such erosion.
- D. Drainage shall be provided either through or around any berms that would otherwise obstruct natural drainage.

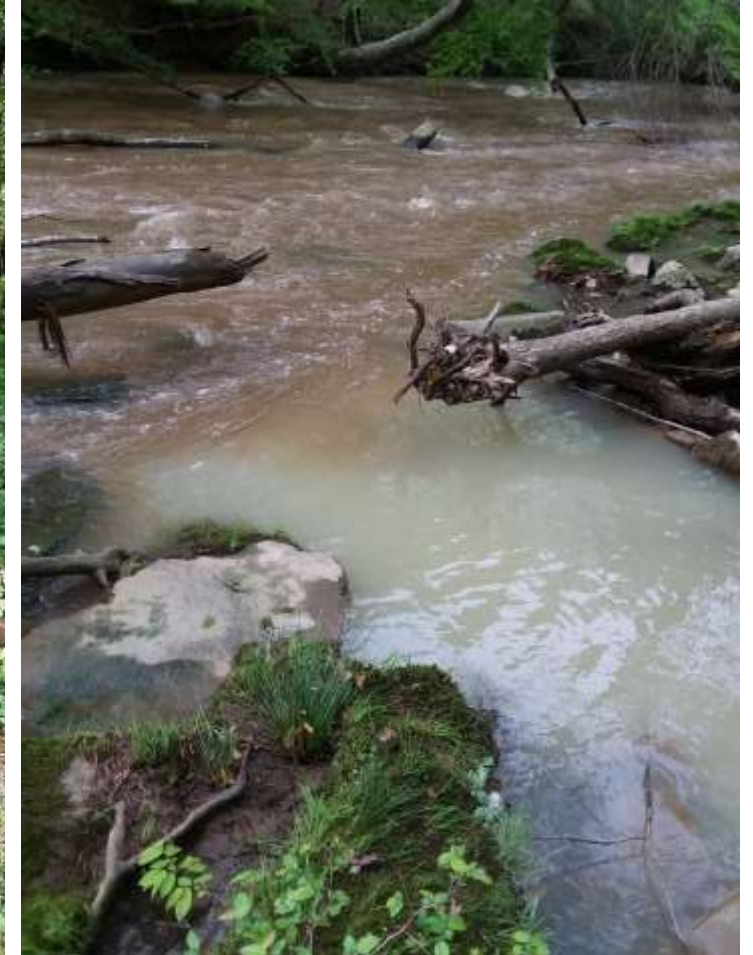
Wake Stone violated Sediment controls required by the Permit – DEQ never issued Violations

MEMORANDUM

TO: Tracy Davis, Mining Specialist
FROM: John Holley, Regional Engineer
SUBJECT: Permit Renewal Request
Cary (Triangle) Quarry (92-10)
Wake County

We have completed our review of the subject application and offer the following comments for your consideration:

- ☒ Although no violations have been cited in a NOV under the Mining Act, it should be noted that a Letter of Deficiency was issued on 2-4-87 for inadequate sediment controls and off-site sedimentation.
- ☒ I have discussed the application with DEM representatives. The Groundwater Section finds no problem with the plan as indicated in the attached memo. The Water Quality Section has verified that Permit NC0050601 is still valid and will expire 11-30-92. The Air Quality Section has verified that Permit 4386R4 is still valid and will expire 12-31-94. Both have indicated that no permit modifications appear necessary.
- ✓ 3. "TST-4" is not properly designed. It must accommodate the runoff from the drainage area to sediment basin "C". Therefore, a properly designed rock dam is required as a minimum.
- ✓ 4. Although the TST's and sediment basins are too deep to provide for efficient settling using the 1800 cf/ac criteria, many of the surface areas specified appear reasonable if a 900 cf/ac criteria is used. I believe this to be sufficient for TST-3, TST-4, TST-5, basin "A" & basin "B" in light of the limited use planned for these structures.



Sediment discharges have completely coated stream bed with hard sediment deposits – in the streams between the Quarry and Crabtree Creek, in direct violation of the permit Conditions – DEQ has ignored multiple complaints of this violation as early as 1992 and as recent as the July 2020 Public hearing on the Mine Expansion Request – Damages are ongoing



Stream In William B Umstead State Park- streambed coated with mineral sediments downstream of the quarry



Healthy Stream in same area not coated with sediment downstream of Quarry discharges

But Wait it gets worse,

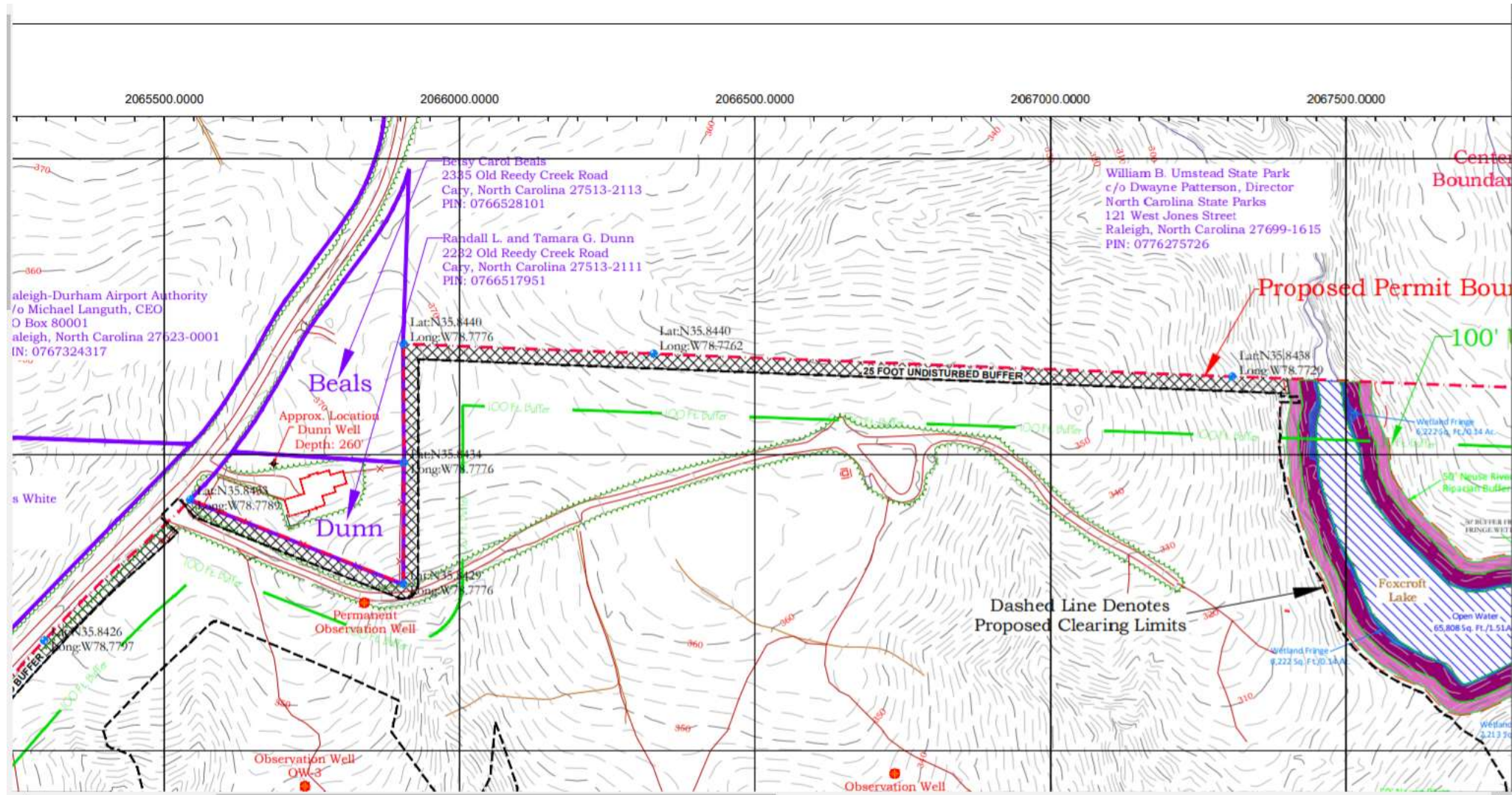
If the violations to the Existing Mine Permit is not bad enough the New Expansion request (2020) Includes more changes to further erode Buffers on the existing site which will significantly and adversely Impact the Park

All buffers proposed are significantly eroded with no benefit to the park or the public, and only of benefit to Wake Stone. There is No Public justification to agree to grant a private company such significant changes in buffers Wake Stone was obligated to protect in the 1981 Permit which allowed mining.

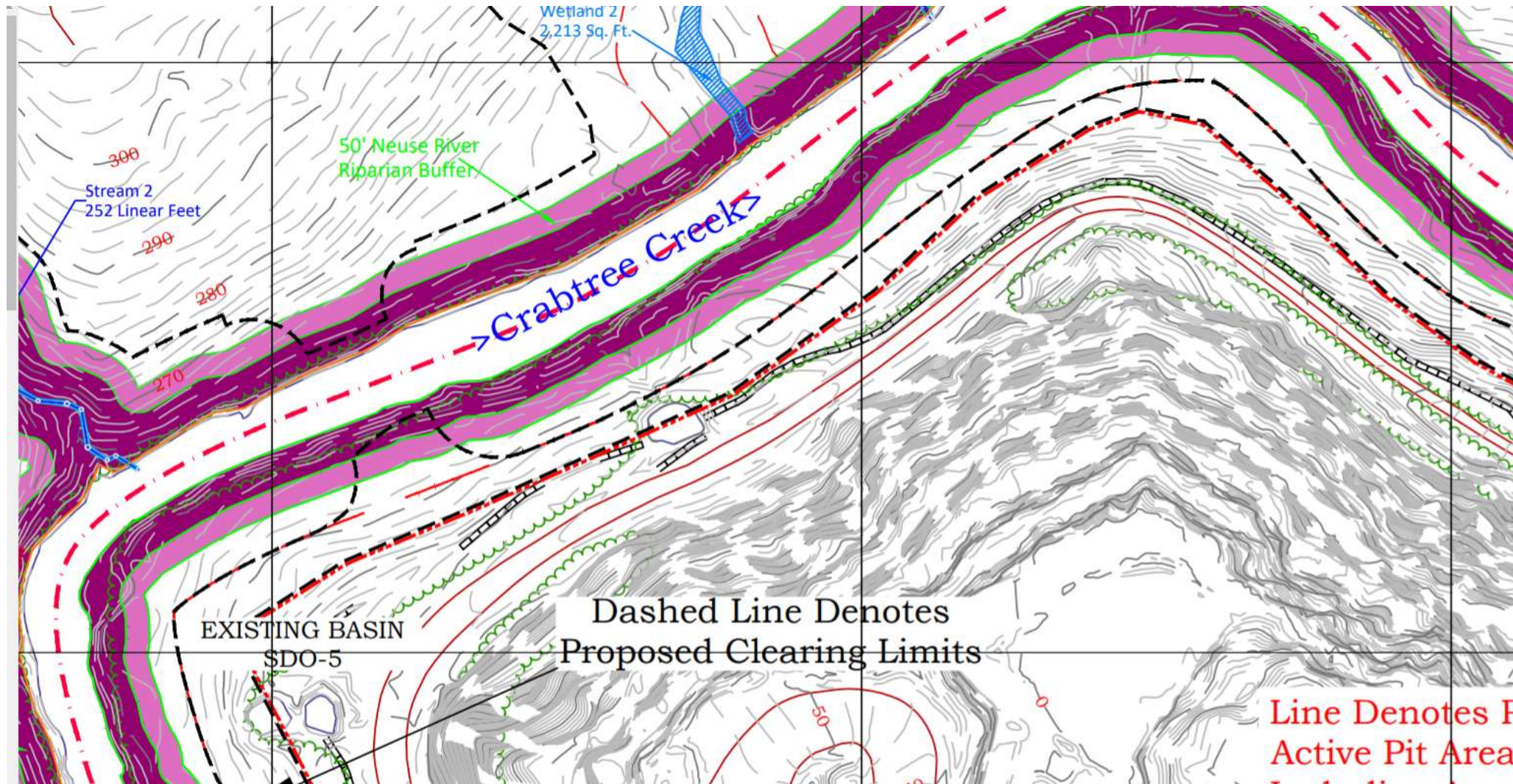
They propose to erode the buffers on the East, North and West of the 1981 approved site, and only offer significantly reduced buffers along the Park in the expansion site. Original park buffer in 1981 was 250 feet, proposed in Expansion site is 25 feet, a 90% reduction of buffer protection to the park that has already incurred significant adverse impacts.

DEQ has not raised any objections to the 90% reduction in proposed Buffers and seems to be ready to accept them, with no public benefit for such drastic changes.

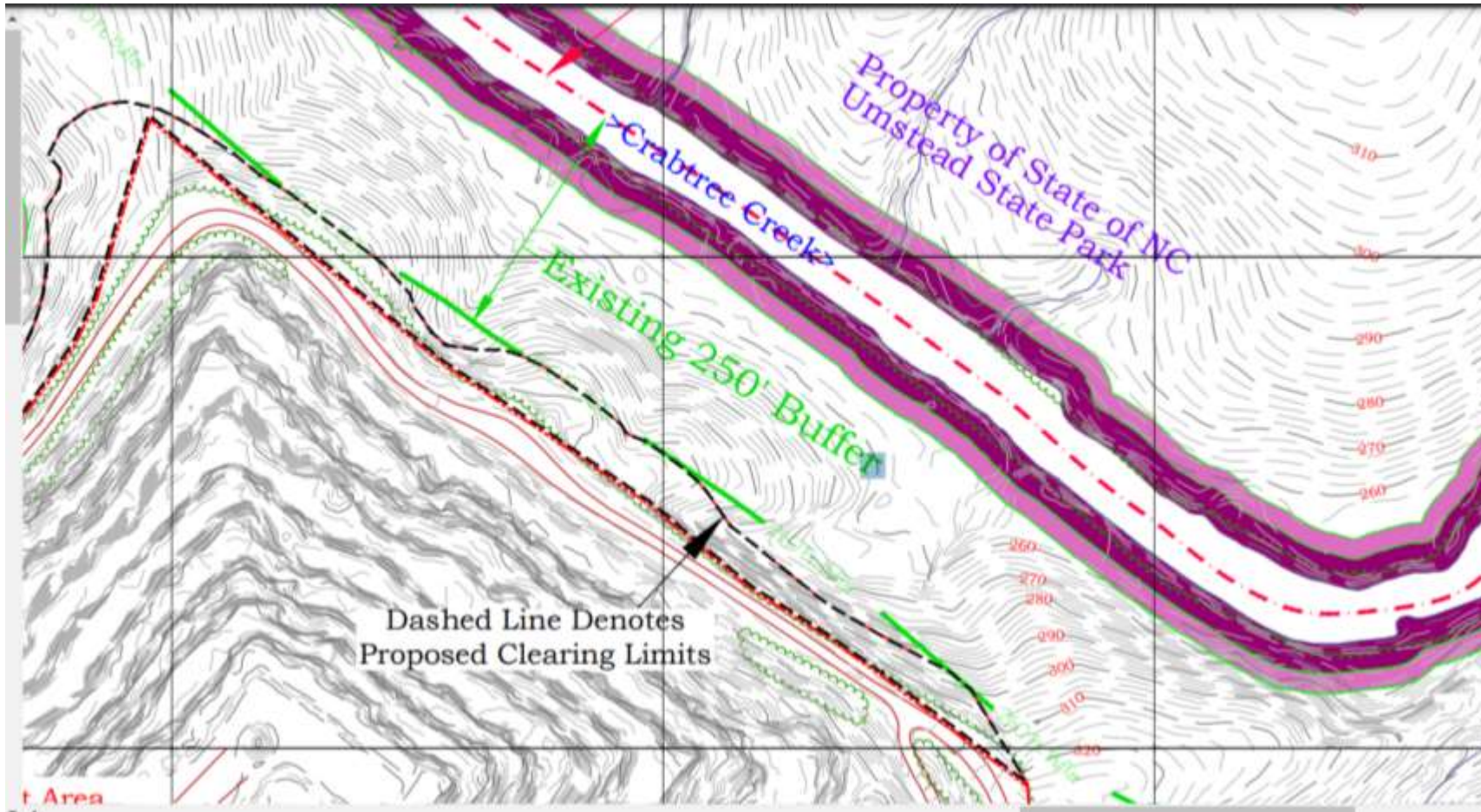
New Expansion request from Wake Stone Guts historical buffer widths from 250 foot undisturbed to only 25 foot undisturbed along the park Boundary, a 90% reduction in the UNDISTURBED buffer. Wake Stone violated the 1981 Buffers early and often, why should we trust they will respect these? DEQ never issued a Violation despite several blatant willful encroachments over the life of the existing mine.



January 2021 Site Plan change proposed by Wake Stone undermines the 1981 Required buffer of existing natural vegetation from top edge of bank, gutting the protection to just the Neuse River Rules, and allows crossing the buffer and creek to establish haul road and bridge through the former Undisturbed buffer of Existing natural Vegetation.

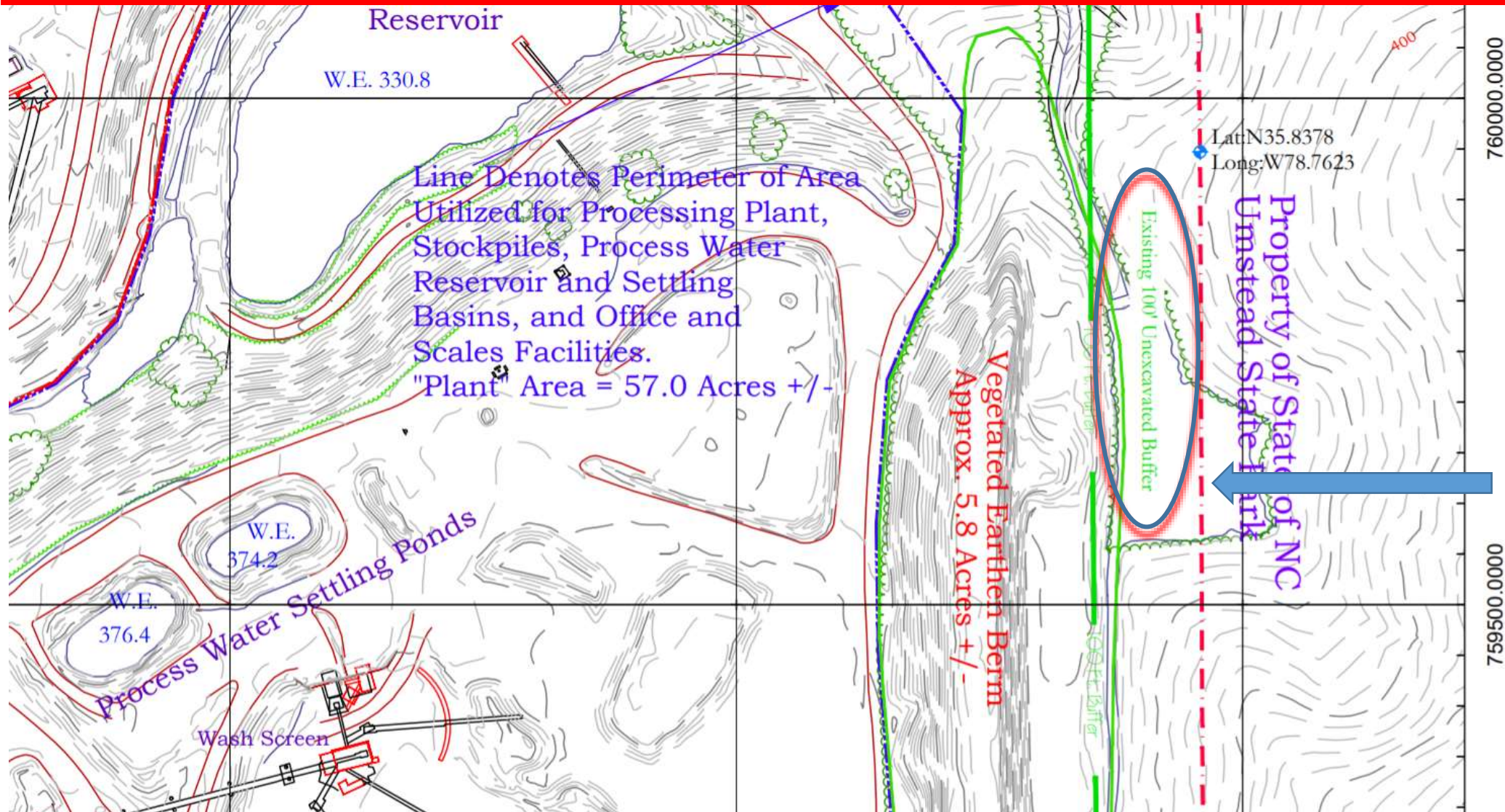


Here on the existing site Wake Stone proposes changing Undisturbed Buffer of existing Natural Vegetation to just Buffer?? So much for honoring the 1981 Permit. Note they also have moved the buffer to Center of creek, allowing them to expand the pit closer to the park and the stream. In 2018 Permit modification approved in 23 minutes they removed Buffer text from the Permit and allowed them to control it on the site plan subject to state approval of the site plan.



What has always been Undisturbed natural buffer of existing natural Vegetation from top pf bank in the permit is now proposed 1/2021 as just Buffer from center of stream.

could be **CLEARCUT** or **FLOODED**.



January 2021- Wake Stone now Proposes to downgrade the Undisturbed Natural vegetated buffer to simply UNEXCAVATED to cover up the flooding violation they have allowed. To do this they have requested the permit text be removed to allow the site plan they control and the state approved to allow these downgrades

More bad things to come...

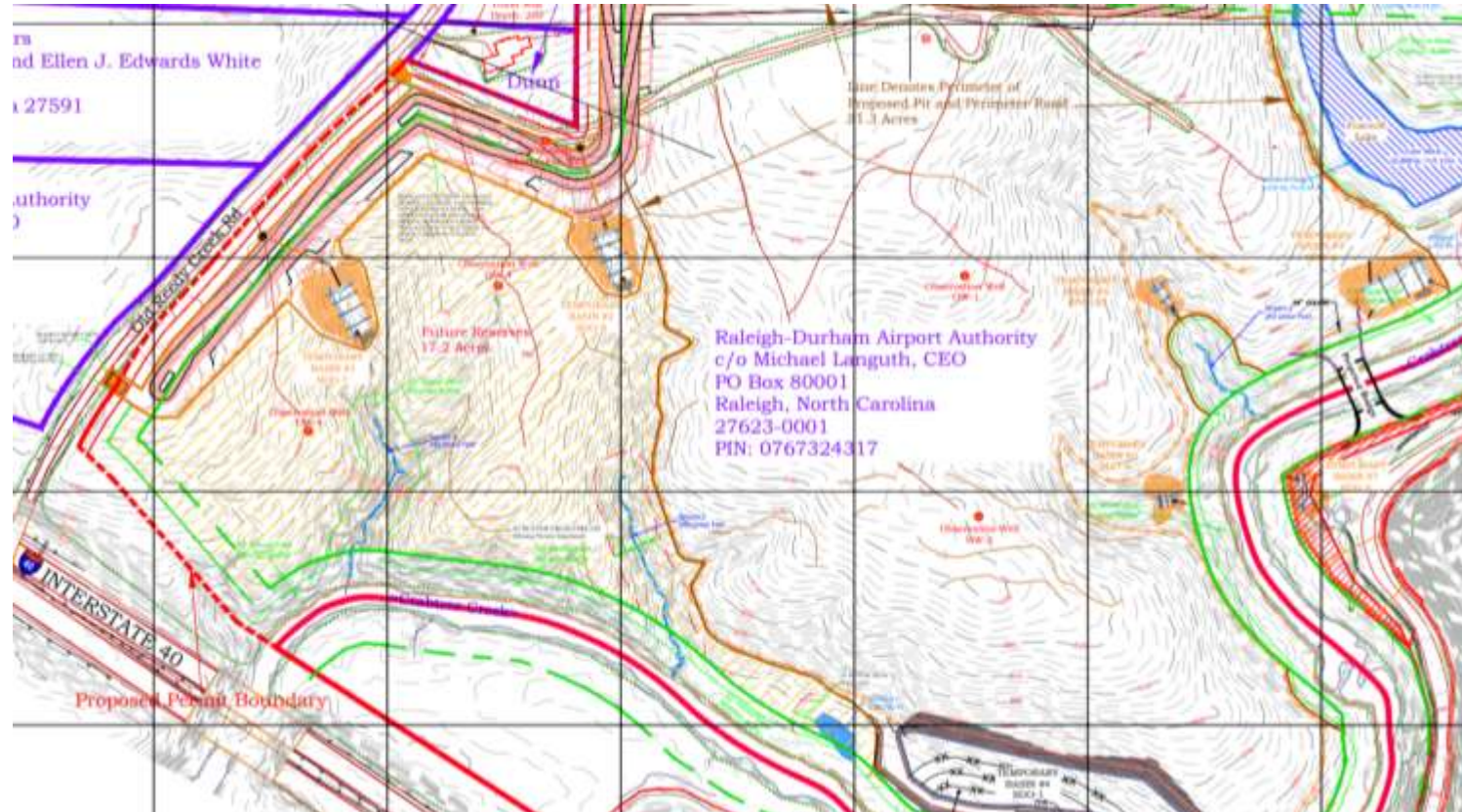


The Proposed NEW Expansion Erodes existing Buffers and proposes gutting new buffers - Undisturbed Buffer Widths along the Park go from 250 feet in the 1981 site to just 25 Feet in the 2021 Proposed Expansion request

This photo from the expansion permit request submitted includes the “Future reserve area” that Wake stone has EXCLUDED in this request. DEQ should require all in our all out, the same area to be approved from mining should be the same area to be evaluated by DEQ and Reclaimed plan.

As submitted the application is incomplete as it is inconsistent in scope in the area to be mined and reclaimed.

In the Expansion Site Plan Submitted to DEQ Wake Stone Excludes the Future Reserves from critical review in this request saying it is EXCLUDED from this request



In the Same Application that Excluded the Future Reserve area, Wake Stone shows that area in its Future Pit Perimeter, and the Reclaimed Concept Plans



Here in the Same Application Wake Stone shows a reclamation view which includes the EXCLUDED FUTURE RESERVE AREA, and completely eliminates the protected Foxcroft Lake.

DEQ should require Wake Stone to be consistent- either Include the Future reserves in this permit scope or Exclude it, but not both mix the two in the same Permit request

Wake Stone has been showing these photos of the Reclamation Plan, in the RDU Lease, on their website, and in presentation to the Wake County Board of Commissioners.

FUTURE RESERVES area excluded from this Mining Expansion request as shown as INCLUDED in the reclamation plan, also of note is the removal of Foxcroft Lake. DEQ should require Wake Stone to only include or EXCLUDE the Future RESERVE area not mix them in the same request.



Despite many violations of the Buffer conditions , Wake Stone asserts they have never violated the conditions because DEMLR/DEQ never cited the Violation!

Just because they were not cited does not change the fact that they violated both the conditions of the Permit and their promise to respect the buffers.

See this comment on Wake Stone Website January 31, 2021---

— Does Wake Stone have a history of permit violations at Triangle Quarry?

Wake Stone has never received a Notice of Violation (NOV) for non-compliance with any of its NC DEQ environmental permits. Wake Stone has worked exceptionally hard to meet or exceed all environmental requirements and permit conditions, and has strived to be a good neighbor to Umstead State Park and the surrounding community.

Conclusion

In 1980 DEMLR denied this quarry do to significant adverse effects on William B Umstead State Park

In 1981 the Mining commission ordered the Mine be permitted anyway

DEMLR worked hard to protect the park from the significant adverse effects of Mining , requiring as a part of the permit both;

Significant Protected Buffers

A 50 Year Sunset Clause

Wake Stone accepted the Permit with these Conditions, and every renewal for 37 years

But over time Wake Stone has violated the buffers and gutted the Sunset Clause

Now they seek to further impact the park with even less in Protection as they expand

The Mining Act of 1971 must be followed

The buffers violated must be mitigated and restored

The 50 Year Sunset Clause Must be reinstated.

The Park must be protected from the Significant Adverse Effects of the Mine

There is a need to review DEQ's Role in protecting the State of North Carolina, the gap between the mission vs the reality has grown over the decades...



NORTH CAROLINA
Environmental Quality

What We Do

The North Carolina Department of Environmental Quality (DEQ) is the lead stewardship agency for the protection of North Carolina's environmental resources.

The organization, which has offices from the mountains to the coast, administers regulatory programs designed to protect air quality, water quality, and the public's health, and also works to advance an all-of-the-above energy strategy that fits North Carolina's needs. DEQ also offers technical assistance to businesses, farmers, local governments, and the public and encourages responsible behavior with respect to the environment through education programs provided at DEQ facilities and through the state's school system.

DEQ touches the lives of all North Carolinians in many ways to enhance and ensure our quality of life.

The reality in the Case - Wake Stone Mining Permit 92-10 does not reflect well on the DEQ Mission...

No Permit Violations were ever written despite Wake Stone Violations of the Permit Conditions Early and Often, ongoing violations exist and remain unmitigated.

The result is significant adverse Impacts on William B Umstead State Park, just as DEMLR Director Stephen G Conrad Predicted in 1980 when he denied the permit.

Time and time again violations were overlooked with "after the fact modifications" that changed the Permit to allow the violation.

Every Permit Modification requested by Wake Stone was approved, each one resulted in less protection to the State and more advantage to Wake Stone.