



M A I N S P R I N G
CONSERVATION TRUST

Stewards of the Southern Blue Ridge

Mainspring Conservation Trust – Simpson Gas and Oil Site EPA Brownfield Cleanup Grant Application FY26

Applicant Information Sheet

1. Applicant Identification

Mainspring Conservation Trust, Inc.
557 East Main Street
Franklin, NC 28734

2. Website URL: <https://www.mainspringconserves.org/>

3. Funding Requested

- a. **Grant Type:** Single Site Cleanup
b. **Federal Funds Requested**
Requested Amount: \$367,605

4. Location

Franklin
Macon County
North Carolina

5. Property Information:

Former Simpson Gas and Oil Site
544 East Main Street
Franklin, NC 28734

6. Contacts

<p>a. Project Director</p> <p>Ben Laseter, Deputy Director / Project Manager Mainspring Conservation Trust, Inc. 557 East Main Street Franklin, NC 28734 Phone: (828) 524-2711, ext. 308 blaseter@mainspringconserves.org</p>	<p>b. Chief Executive/Highest Ranking Elected Official</p> <p>Jeremy Hyatt, Executive Director Mainspring Conservation Trust, Inc. 557 East Main Street Franklin, NC 28734 Phone: (828) 524-2711, ext. 311 jhyatt@mainspringconserves.org</p>
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7. Population

For Franklin, North Carolina population is 4,105.

8. Other Factors Checklist

Other Factors	Page #
Community population is 15,000 or less	1, 4
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	1, 5
The priority brownfield site(s) is impacted by mine-scarred land.	No
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	9
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	2, 4
The priority site(s) is in a federally designated flood plain	2, 4
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	Yes
The reuse of the priority site(s) will incorporate energy efficiency measures.	Yes
The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters.	Yes
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2015 or later) or is closing.	No

9. Releasing Copies of Applications

The following portions of the grant application are confidential.

Personal telephone numbers and email addresses for partners listed in Criterion 2.b.

The Cost Estimate Details in Criterion 3.c.

1.0 PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1.a. Background and Description of Target Area

Mainspring Conservation Trust (Mainspring), a 501c3 non-profit organization located in the Town of Franklin, North Carolina (Franklin), is applying for a cleanup grant for their property, the former Simpson Gas and Oil Site (Simpson Site). Mainspring's mission is to be the motivating force for conservation in the heart of the Southern Blue Ridge, to conserve the water, forests, farms and heritage of the Little Tennessee and Hiwassee River basins.¹

The Simpson Site is located in Franklin, a very small town (population 4,105)² located in the middle of the Nantahala National Forest in southwestern NC, straddling the Little Tennessee River. ***The Target Area is downtown Franklin, NC, and Census Block 371139703.04.*** Franklin has been considered an ***“at risk” community*** based on the Distressed Community Index (DCI)³ primarily due to its poverty rate and low median household income. This Census Block is now considered an Opportunity Zone, a US Treasury Designation which provides Tax Credits for Qualified Investors to address poverty.

Franklin is also located ***adjacent to the last “Distressed Area”*** in Macon County as determined by the Appalachian Regional Commission in 2021. The Target Area includes the Little Tennessee River, which is part of a highly sensitive ecosystem and provides for local fishing along with its highly rich biota. Cleanup actions will add further protection to the River and its ecosystem which provide protein sources to the local population. The Simpson Site is located along the banks of the Little Tennessee in a Federal Floodplain area. The nearest tributary below the site is Crawford Branch, the most urban, lowest water quality stream in the area. The immediate area surrounding the Simpson site is flat, highly commercial area paved with streets and parking lots and subject to flash flooding during summer rain storms as well as long-duration storms. Such weather events contribute to contamination in the Little Tennessee River as there are no sufficient methods for control of stormwater due to the combination of high mountainous slopes and fast-running water in the floodplain during rain events along with legacy contamination associated with heavily contaminated sites such as Simpson Oil.

Simpson Oil sits next to the Nikwasi Mound which represents both historical and cultural importance to the Cherokee Indians, who lived in the area before early European settlement in the 1700s, and the City of Franklin. In the 1500s, the Target Area was once an ancient and important Cherokee town called Nikwasi. Most Cherokees were removed in 1850 due to the Indian Removal Act of 1850. The last visible remnant of this town is the Nikwasi Indian Mound in downtown Franklin, adjacent to the Simpson Site. The Nikwasi Mound is estimated to be well over 1000 years old, but its true age is unknown. In 1946, the small parcel containing the mound was preserved from further leveling and development through efforts of Franklin schoolchildren. During a class visit to the mound, the children noticed a "For Sale" sign on the property. This spurred them to initiate a campaign of penny contributions, ultimately raising \$1,500, enough to purchase the property, which was deeded to Franklin for protection and preservation. Today, the Mound's beauty is obscured by the abandoned and underused properties surrounding it. This relic of Cherokee history is the lone grassy parcel among a block of gas stations and parking lots where used cars and military equipment are sold.

Mainspring is working in collaboration with the Town of Franklin, the Eastern Band of Cherokee Indians (EBCI), Macon County and other organizations such as the Nikwasi Initiative and other organizations to revitalize the brownfield sites surrounding the Nikwasi Mound. Very few examples of highly collaborative initiatives between tribes and rural communities exist in

¹ Mainspring Conservation Trust, <https://www.mainspringconserves.org/>

² U.S. Census, www.census.gov

³ Economic Innovation Group, Distressed Community Index, <https://eig.org/DCI>

⁴ US Department of Transportation RAISE Discretionary Grants, <https://www.transportation.gov/RAISEgrants>.

the US. The Nikwasi Initiative is an historic opportunity for all our partners to create a national model of reconciliation and cooperative community-development efforts⁵.

The past uses (bulk oil distribution, light industrial, auto repair) of the derelict brownfield sites surrounding the Nikwasi Mound have resulted in contaminated soils and groundwater that are a direct threat not only to the Nikwasi Mound, but to the Little Tennessee River due to their proximity to the river and location in a ***Special Flood Hazard Area⁶ (Federal Flood Plain)***. The Simpson site (former Simpson Gas and Oil parcel) now owned by Mainspring is the last identified brownfield site in the area in need of remediation before successful redevelopment can occur as a public space.

1.b. Description of the Proposed Brownfield Site(s) (10 points)

The Brownfield site for this grant is the Simpson Site located at 544 East Main St. in Franklin, NC. The Simpson Site is currently vacant and consists of 0.67 acres surrounded on three sides by US 441/NC State HWY 28 (East and Northeast Main St. and Big Bear Lane) and located ***directly across the street from the Little Tennessee River and in the Federal Flood Plain***. The US 441/NC 28 bridge over the river is the primary road access to the town bringing ***heavy traffic*** past the three sides of the Simpson Site. The Nikwasi Mound site is directly connected to the Simpson Site via a “panhandle” strip of property. The *Little Tennessee Greenway is located directly north* across US 441/NC State HWY 28. Properties around the Simpson Site consist of abandoned and active commercial sites, parking lots and a high percentage of impervious area in close proximity to the Little Tennessee River.

The Simpson Site served as a fuel station and bulk oil distributor, selling kerosene, fuel oil, gasoline, and diesel fuel in the 1950’s through the 1980’s in Franklin and surrounding rural communities and small towns. The operation included three fuel dispensers in addition to heating oil and kerosene distribution (via the overhead product lines) and several above ground and underground petroleum storage tanks. While there is considerable data and site information in various environmental reports maintained by the North Carolina Department of Environmental Quality (NCDEQ) Underground Storage Tank (UST) Registered Tank Database, the site is now cleared of numerous above ground and underground tanks.

A series of site assessments were conducted by the previous owner from 1999 through 2015. Mainspring completed a Phase I Environmental Site Assessment (ESA) in February 2017. The assessments revealed the ***following recognized environmental conditions*** in connection with the Simpson Site: ***Petroleum contaminated soil and groundwater*** have been documented on the subject property and ***Asbestos Containing Materials (ACM)*** were found in a now-removed single-story structure. Near-surface ***soil contamination is currently present at concentrations that exceed the NCDEQ Inactive Hazardous Sites Industrial / Commercial Preliminary Soil Remediation Goals (PSRGs)***, and a ***dissolved contaminant plume*** is present ***under most of the subject property*** and is likely ***migrating easterly towards the Little Tennessee River***. Mainspring purchased the property in early 2017 and negotiated a Brownfields Agreement with NCDEQ in November 2017 that allows the property to be redeveloped for greenspace, public park, commercial / retail, or light industrial uses. Plans for additional greenspace are being coordinated by Mainspring, the Nikwasi Initiative, and local Franklin planners, historic, economic development and state agencies - see more detail in 2.e and 2.f on page 6 of 10.

⁵ Nikwasi (alternate spelling = Noquisi) Initiative, <https://www.noquisi.org/>

⁶ National Flood Hazard Layer (NFHL) FIRMette, FEMA, exported 10/05/2012.

1.c. Reuse Strategy and Alignment with Revitalization Plans

The redevelopment plan for the Simpson Site consists of greenspace, with plantings, walkways, benches, and possibly public art. The redevelopment will evaluate site *storm water drainage for sustainable improvements to protect the Little Tennessee* and surrounding property due its location in a *Federal Flood Plain*⁶. These features are part of a larger redevelopment plan that will incorporate the Simpson Site into the future Nikwasi Center and connect to the adjacent Little Tennessee Greenway.

The site *redevelopment plan ties directly to the Franklin Comprehensive Land Use Plan*⁷, approved by the Town Council in June 2020, that aims at preserving Franklin’s small-town charm and creating *more green spaces* while making *infrastructure improvements* to increase access for residents and visitors which are currently limited. The Land Use Plan was developed with *significant community input and collaboration*, with stakeholder interviews, surveys, open houses, and tours, and has continued to be discussed and actively implemented by Franklin and its partners. The Land Use Plan lays out guidelines for town land use policy over the next several years and specifically addresses the redevelopment of the area surrounding the Nikwasi Mound to support the future Nikwasi Cultural District Center, *encourage investment downtown, improve access to the Greenway*, and promote open space as part of *new development*.

1.d. Outcomes and Benefits of Reuse Strategy

The Simpson Site Cleanup will result in several key outcomes and benefits for the Target Area, where project partners and stakeholders continue to implement their plans for improving and revitalizing Franklin’s downtown, the establishment of the future Nikwasi Center, and protect the river basin.

1. Removal of contaminated soil, reduction of contaminants in soil, water, and air will provide health benefits for the community and protect the *Little Tennessee River’s critical habitat for rare and endangered species* and natural food sources.
2. Improved and more sustainable storm water control and flood plain management will support continued conservation/protection for the Little Tennessee River, and improve downtown infrastructure improvements.
3. Site redevelopment will improve access and increase use of the Greenway, provide new green space and public park, creating health benefits with more walkable downtown and exercise/recreation options. Additional tree cover in green space will improve air quality.
4. Site redevelopment will further the development of the future Nikwasi Center for cultural heritage and increase tourism.
5. Further economic investment in commercial properties surrounding the future Nikwasi Center with more retail, restaurants, and other needed services for residents.
6. Increase property values, tax revenues, and much needed economic opportunities & jobs.

1.e. Resources Needed for Site Characterization

The previous investigations conducted at the site sufficiently characterized the overall extent and degree of contamination to develop a draft Analysis of Brownfields Cleanup Alternatives (ABCA) with a preferred cleanup approach. At this time, no additional resources are believed to be needed for site characterization. In the case the site needs additional assessment for characterization, alternative funding will be sought from such entities as the United States Department of Agriculture Natural Resources Conservation Service (USDA-NRCS), the North Carolina Department of Environmental Quality (NCDEQ), or other local, state, or federal sources.

⁷ Franklin Comprehensive Land Use Plan, June 1, 2020,
https://www.franklinnc.com/pdf/planning/Franklin%20Town%20Plan_FINAL_ADOPTED_20200601_reduced.pdf

1.f. Resources Needed for Site Remediation

The EPA funding requested in this application will be sufficient to allow Mainspring to complete the remediation. In the case additional funding is needed to complete necessary remediation at the site, alternative funding will be sought from such entities as the USDA-NRCS, or other local, state, or federal sources. There is currently \$12M awarded to the NC Division of Emergency Management from the FEMA to support development and submission of hazard mitigation projects in the Hurricane Helene area available if needed.

1.g. Resources Needed for Site Reuse

Mainspring and their key partners, Nikwasi Initiative and Franklin are all eligible for funding from numerous sources that can be utilized to further the redevelopment of the Simpson Site. Franklin is eligible for NC Department of Commerce funding for economic development (Downtown Development Funds) and infrastructure investments. All three partners are eligible for NC Department of Natural and Cultural Resources grants, and NCDEQ funding for brownfields. USDA-NRCS and USDA Forest Service Grants will also be pursued to ensure continued coordination and collaboration on Little Tennessee River and National Forest conservation.

Mainspring actively and successfully pursues grant funding from both government and private sources and has been in conversation with NCDEQ about additional brownfield funds for assessment and cleanup for sites near the Nikwasi Mound. Both Mainspring and the Nikwasi Initiative will continue to actively fundraise to complete redevelopment of the area.

1.h. Use of Existing Infrastructure

The revitalization plan to incorporate the Simpson Site into the Nikwasi Center will utilize the existing infrastructure (power, water, sewer, and roads) at the site and improve the storm water drainage to match the planned site reuse and enhance environmental sustainability as the site is in a *Federal Flood Plain*⁶ and within *one block of the Little Tennessee River*.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a. The Community's Need for Funding

Franklin, NC is a very small town, the *current population is estimated at less than 5,000*², with a *population of 1,455*⁸ in the census block that includes downtown Franklin. The census block is particularly distressed, experiencing significantly lower income and higher poverty rates as compared to Macon County. Census block *Current Median Household Income is \$37K*⁸, *compared to \$57K in North Carolina. In 2017 the Census Block was identified as a Certified Opportunity Zone with a low-income population of 63% while the NC average was 36%*⁸.

Franklin struggles with attracting economic investment into the community. Due to the very small population, few local businesses, and low-income level in Franklin, there is an inadequate tax base and related resources to invest in redevelopment of downtown. Mainspring, the property owner and grant applicant, is a small non-profit, with very limited resources has been trying for the past five years to obtain the funding needed to execute the Simpson Site cleanup.

2.b. Health or Welfare of Sensitive Populations

In addition to the *population living in poverty*, Franklin, in general has a *significant elderly population* (26%) as compared to NC (18%) based on the latest U.S. Census Bureau data and the US (16.5%)⁹. The Macon Co. population under 65 years of age *lacks health insurance* (18.2%, compared to NC 13.4%, US 10.2%)¹¹ and has *larger disability* rates (11.6%, compared to NC 9.4%, US 8.6%)⁹. Macon County is *80%*¹¹ *rural and mountainous*, with twisty winding roads, making travel difficult to major population centers for needed services for the elderly and

disabled population and to well-paying jobs for the general population. Other sensitive populations in Franklin and Macon County include Veterans at (9.8%, Macon County vs 7.6% Statewide) and small children, and females of child-bearing age. The Simpson Site cleanup and redevelopment into greenspace and connectivity to the more extensive greenway will provide more natural and safe walking places will be created by energy efficient and/or solar lighting, and beautiful vistas of the Nantahala National Forest and Little Tennessee River. This provides a natural exercise space closer to sensitive populations and support the redevelopment of downtown Franklin, bringing additional needed services, commercial businesses, and jobs. Those sensitive populations who fish the river for subsistence will have better assurance the stream is clean for eating local trout and other fish.

The high concentration of brownfield sites and underutilized and abandoned properties that were built prior to 1960 in downtown Franklin, as well as the adjacent heavily trafficked US 441 affect the health and well being of the sensitive populations. The redevelopment of the Simpson Site for cultural tourism will support the redevelopment of downtown Franklin, bringing additional needed services, commercial businesses, jobs, green space, and safe walking places for exercise closer to the sensitive populations. These measures further support local health efforts to promote exercise and healthy eating habits for sensitive individuals.

2.c. Greater Than Normal Incidence of Disease and Adverse Health Conditions

New greenspace will provide opportunities for those with *Greater than Normal Incidence of Disease and Adverse Health* conditions to walk and be outside, healthy activities which can create advantage to improve their physical and mental health as well as prevent new adverse conditions. In the Census Block, and within the Town of Franklin, there is higher incidence of several adverse health conditions – one being obesity. 68.3% of adults in Macon County are considered overweight, or obese, and those identifying as black or Native American or more likely to be obese. Obesity leads to more harmful illnesses, including heart disease and diabetes, among others. The local hospital and library are supporting a State Initiative to encourage more physical activity and healthy eating. As the Simpson Oil site is cleaned up, more greenspace and trails will be accessible to those at work as well as those at play, as the Census Block is in an area where there are many workers, but also a busy highway. The new greenspace will connect with additional greenspace purchases as part of the Town of Franklin Master Plan. The local hospital and library will feature all available greenspaces as places to walk for fitness and mental health. Mainspring will encourage use of the new greenspace and Greenway for this important community initiative.

2.d. Economically Impoverished/Disproportionately Impacted Populations

This grant is critical to achieve redevelopment of the downtown area of Franklin and to achieve the Nikwasi Initiative's and the EBCI's goal to protect a *sacred Native American site*, develop a cultural center to honor their ancestors and teach other Americans and visitors from abroad to appreciate and understand their culture and heritage.

⁹ United States Census Bureau Quick Facts, American Community Survey (ACS), 2021-2023, <https://www.census.gov/quickfacts/fact/table>

¹⁰ Economic Innovation Group, Opportunity Zones, Macon County, NC, Census Block 37113970301, ACS 2012-2016

¹¹ 2021 State Level Data and Ranks / University of Wisconsin Population Health Institute, School of Medicine and Public Health, Robert Wood Johnson Foundation. www.countyhealthrankings.org

¹³ Centers for Disease Control and Prevention, National Center for Chronic Disease Prevention and Health Promotion, Division of Population Health, PLACES Project Data [online] accessed Oct. 28, 2021, URL <https://www.dcd.gov/>

One of the benefits of this project and redevelopment of surrounding property is the return of traditional Cherokee land taken from the Cherokees as a result of US Government policies in the early 19th Century to the tribe and ***putting the property into productive use for the EBCI both spiritually and economically***. The ***benefits will be shared with all members of the tribe***, which is centered in Cherokee, NC just 30 miles away. Further, the resurgence of this downtown Franklin census block has been stymied for years due to the brownfield properties and long-term blight because of changed economic factors in far western North Carolina. ***Businesses permanently closed decades ago, keeping the town residents impoverished and their property values low***, while other areas in Macon County have flourished.

2.e. Project Involvement / 2.f. Project Roles

Mainspring, the Nikwasi Initiative, and Franklin have formed a strong partnership to further their mutual goals and objectives to redevelop the area around the Nikwasi Mound. They coordinate and support each other's planning initiatives, such as the Nikwasi Center Master Plan and Franklin's Comprehensive Plan and work together to engage with the public and community to obtain feedback and support through their respective stakeholders. This close partnership is extremely effective to ensure the cleanup of the Simpson Site results in a smooth transition to the next steps for final redevelopment into the Nikwasi Center. Project partners and stakeholder representatives and their roles are:

Nikwasi Initiative: Elaine Eisenbraun, Executive Director, Partner for redevelopment of the Simpson Site, coordination of greater planning effort at Nikwasi Center. **Town of Franklin Planning Department:** Justin Setser, Town Planner. Partner for redevelopment of the Simpson Site, will provide infrastructure & town management interface for project, assist with communication to community. **EBCI Tribal Historic Preservation Office (THPO):** Stephen Yerka, Tribal Historic Preservation Specialist. The THPO will assist with redevelopment planning, perform consultation and archeological monitoring oversight. **Macon County Economic Development Commission:** Tommy Jenkins, Director. Major stakeholder and planning for the site's connection to Little Tennessee Greenway.

2.g. Incorporating Community Input

Mainspring will continue to actively engage with the community and their stakeholders through a variety of measures. The key partners engage in monthly stakeholder meetings now underway around the greater Nikwasi Center project, that are open to the public. The Nikwasi Initiative is a key platform for keeping Cherokee, Franklin, and Macon County stakeholders apprised of project progress at the future Nikwasi Center (including the Simpson Site). Mainspring has a dedicated Communications Director who updates the public monthly about Mainspring projects through the Mainspring website and regular press releases. Mainspring enjoys a close relationship with the local press, who are dedicated to publishing updates regarding progress on initiatives occurring within Franklin and Macon County. Further, Mainspring will conduct a series of public meetings specific to the Simpson Cleanup Project, starting with a Kick-off meeting to discuss the grant, review and obtain feedback for the updated Analysis of Brownfield Cleanup Alternatives (ABCA) and final cleanup plan, a mid-project status review meeting, and a final project closure review and celebration meeting. In conjunction with the public meetings, factsheets and posters will be produced that in addition to being used at the meetings will be available and posted at the Nikwasi Center, Mainspring's office, and the Franklin's city offices for public viewing and feedback. Meeting locations and public information viewing locations are where social distancing and other safety measures can be practiced, protecting the health of the participants.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3.a. Proposed Cleanup Plan

Based on the findings from the series of assessments completed by Mainspring a draft ABCA was prepared, and Mainspring signed a *Brownfields Agreement (BA) in November 2017 with the NCDEQ Brownfields Program.* The cleanup plan will achieve the primary goals to protect the public, the groundwater, the floodplain, and adjacent river. Mainspring has initiated cleanup activities by demolishing the abandoned structure with ACM in August 2021 and conducted further stakeholder communications about redevelopment of the property. The cleanup consists of the following steps. **1)** Removal and disposal of the abandoned heating oil UST, 550 gallons petroleum liquids, 30 tons of non-hazardous soil. **2)** Excavation and disposal of the compacted gravel surface, 28,000 square feet (SF) to 8 inches deep = 21,000 cubic feet (CF). **3)** Excavation and proper landfill disposal 720 tons of petroleum-contaminated soils. **4)** Confirmation sampling to ensure the removal of the contaminants to meet NCDEQ Cleanup Standards. **5)** Perform archaeological monitoring on the site during excavation on an as-needed basis. **6)** Backfill with clean fill (720 tons) to protect the groundwater, stabilize the site, and provide appropriate storm water controls until the site can be redeveloped per the community’s plan. And **7)** Implementation of Institutional Controls per the Deed Restrictions, prohibiting the disturbance of the soil cover and extraction of groundwater from the property.

3.b. Project Implementation / 3.c. Anticipated Project Schedule / 3.d. Task/Activity Lead / 3.e. Outputs

Task 1 – Grant Management / Project Management / Reporting
i. The Deputy Director for Mainspring will directly manage the grant and execution of the cleanup project. Subtasks include establish cooperative grant agreement with EPA; procure and oversee the Environmental Consultant (EC) and disadvantaged business enterprise (DBE); track project tasks, schedule, and budget; quarterly reporting on project activities and accomplishments to the EPA; updates to ACRES; attend national or region brownfield conference; and the Final Cleanup Report. The EC will support quarterly reporting activities and develop a Grant Closeout Report.
ii. Schedule: EPA grant agreement within 60 days of grant award. EC to be procured within 60 days of grant agreement. Quarterly and annual reporting throughout grant period of performance, assume 24 months. Attend one conference during first year of grant.
iii. Lead: Mainspring Project Director with EC assistance as noted above.
iv. Outputs: 8 Quarterly Reports, 1 Closeout Report, 1 Conference
Task 2 – Community Outreach
i. Mainspring will develop and implement a Community Involvement Plan (CIP). Host a Community Kick-off Meeting. As project milestones are completed, prepare and publish updated project communication materials on website, factsheets / posters for distribution to the community and display at the Nikwasi Center and Mainspring office. Conduct community stakeholder meetings. The EC and DBE will assist with content and Community Partners will assist with meetings and distribution of information.

ii. Schedule: Prepare and issue CIP in Year 1 Q1, Conduct community meetings: Kick-off after CIP and in conjunction with release of updated ACBA for comment, conduct interim meeting, and cleanup completion meeting. Communication information provided for meetings at least semi-annually, website updates quarterly. Total cleanup project schedule is 18 to 24 months.

iii. Lead: Mainspring Project Director and staff, with EC / DBE assistance

iv. Outputs: CIP, 3 Community Meetings; 3 information updates / factsheets / posters / press releases. 8 Quarterly updates to Mainspring website.

Task 3 – Cleanup Planning

i. Cleanup planning activities 1) Update the ABCA, conduct 30-day public review and comment period; 2) Develop and obtain EPA / NCDEQ approval of Environmental Management Plan (EMP) and Quality Assurance Project Plan (QAPP) for Cleanup and 3) Prepare and execute work plan for suitable backfill borrow source.

ii. Schedule: Final ABCA (Year 1 Q1), EMP and QAPP (Year 1 Q2), Borrow source (Year 1 Q3)

iii. Lead: Environmental Consultant

iv. Outputs: 1 ABCA, 1 EMP, 1 QAPP, borrow source identified.

Task 4 – Cleanup Activities

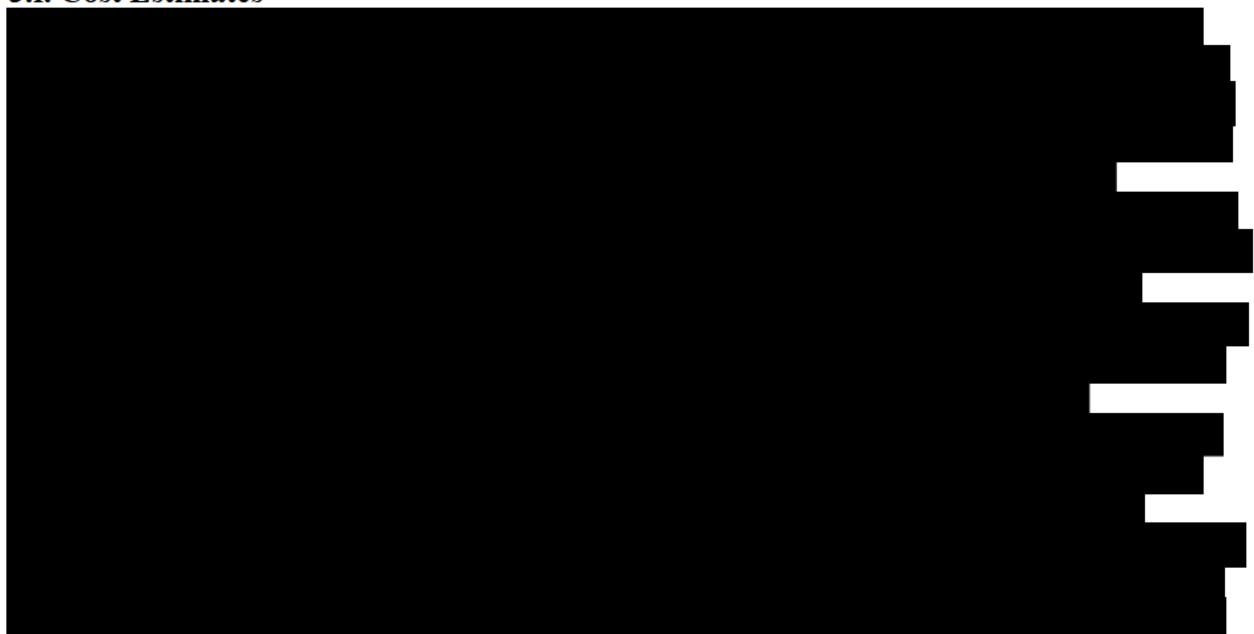
i. The cleanup activities as described in Section 3.a. Proposed Cleanup Plan.

ii. Schedule: Mobilize the EC remediation crews to the site Year 1 Q4, UST Closure, Petroleum contaminated soil removed Year 1 Q4; Backfill Year 2 Q1-2; Site grading and stabilization, Year 2 Q3. Final Cleanup Report, Year 2 Q4.

iii. Lead: Environmental Consultant, except EBCI THPO for Archeological monitoring

iv. Outputs: Receipt of disposal manifests, confirmatory sampling results, Final Cleanup Report

3.f. Cost Estimates





Budget Categories	Project Tasks (\$)				
	Grant Management / Project Management	Community Outreach	Cleanup Planning	Cleanup Activities	Total
Personnel / Fringe	8,460	3,780			12,240
Travel	1,600				1,600
Supplies		2,000			2,000
Contractual	12,420	5,780	15,265	318,300	351,765
Total Direct Costs	22,480	11,560	15,265	318,300	367,605
Indirect Costs					
Total Budget	22,480	11,560	15,265	318,300	367,605

3.d. Measuring Environmental Results

Mainspring will include key project milestones and a detailed schedule in the project work plan for activities / outputs such as such as ABCA, Kick-off and other public meetings, EMP / QAPP approval, and cleanup activities) to be completed. Work progress and the cost as compared to budget will be monitored and evaluated monthly with the EC and the primary project partners, Nikwasi Initiative and Franklin. Project outputs, outcomes and results will be input quarterly to the EPA’s ACRES. Outcomes beyond the completion of the cleanup will continue to be monitored with project partners as the Simpson Site is redeveloped and incorporated into the Nikwasi Center, the Greenway, and new economic investment in surrounding properties and businesses as discussed in Section 1.d.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4.a. Organizational Structure / 4.b. Description of Key Staff

Mainspring has a staff of 12; five staff members will be available to administer, coordinate, and implement tasks for this project. ***Ben Laseter, PhD, Mainspring's Deputy Director, will be the project manager*** for the Simpson Site project. Dr. Laseter served as project manager for the 2016 JH Duncan Oil brownfield cleanup, which was funded by \$294,000 through Land-of-Sky Regional Council's EPA RLF and he managed the Environmental Assessment effort completed at the Simpson Site. ***Wendy Duvall, Mainspring's Finance Director;*** will be responsible for the overall financial management required for the execution of this grant. Ms. Duvall has over 25 years' experience in financial administration. ***Sharon Burdette, Mainspring's Development and Administrative Assistant,*** will assist Dr. Laseter ***with grant budgeting and reporting,*** assisting with tracking costs and processing invoices from the Consultants and to EPA. Ms. Burdette has over ten years' experience as a bookkeeper and with grant budgeting / reporting for the Little Tennessee Watershed Association and Mainspring. ***Molly Phillips, Mainspring's full time Communication Director,*** has more than ten years' experience with non-profit development and communications. She will oversee communication materials and press releases.

4.c. Acquiring Additional Resources

Mainspring administers \$500,000 to \$1,000,000 annually in federal, state, and foundation funds. Mainspring is experienced in acquiring both local and regional contractors for a variety of specialized projects including major stream restoration design and construction, and brownfields remediation. Mainspring's acquisition process includes a Request for Qualifications (RFQ) published on Mainspring's website and sending the RFQ to a list of contractors that Mainspring regularly utilizes for environmental and civil design work. The Project Director with assistance from the Finance Manager will perform a thorough review of all submitted qualifications packets, interview candidate firms if appropriate, and subsequent contract negotiations. Mainspring will ensure that all contracting will be conducted in compliance with EPA's procurement requirements per 2 CFR 200.

Past Performance and Accomplishments

4.e. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements

1) US Fish and Wildlife Service, North Carolina Land and Water Fund, \$318,145 for stream restoration of 2,000 linear feet on the Little Tennessee River in 2024. The restoration was successfully completed in Macon County NC, and all contractual and reporting requirements were met. **2)** North Carolina Land and Water Fund, \$604,381. The funds were used to purchase a conservation easement in Graham County, NC for headwaters conservation (Simp Gap Conservation Easement) in 2018. The conservation project was successfully completed, and all contractual and reporting requirements were met. **3)** North Carolina Land and Water Fund, \$577,685 for headwaters conservation (Shut-In Creek Conservation Easement) in 2019 for fee simple purchase and subsequent conservation of approximately 500 acres in Jackson County, NC. The purchase and easement were successfully completed, and all contractual and reporting requirements were met.

IV.C. Threshold Criteria (Attachment)

1. Applicant Eligibility if other than a city, county, state, or tribe. Include documentation of 501 (c)(3) tax-exempt status.

Mainspring Conservation Trust, Inc. (EIN 56-2142199) was recognized as exempt under section 501(c)(3) of the Internal Revenue Code in a determination letter issued by the IRS in February 2016 (see attached). As a nonprofit organization, Mainspring's mission is to conserve the waters, forests, farms, and heritage of the Upper Little Tennessee and Hiwassee River Valleys in western North Carolina and northern Georgia.

2. Information on previously awarded Cleanup Grants

The former Simpson Gas and Oil Site has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds

Not Applicable. Mainspring is not a recipient of EPA Multipurpose Grant funds.

4. Site Ownership Information

Mainspring Conservation Trust, Inc. (Mainspring) owns the former Simpson Gas and Oil site. The property was acquired from Simpson Gas and Oil, Inc. via fee simple title through a deed recorded on November 13, 2017.

5. Basic Site Information

- a) Name of Site: Former Simpson Gas and Oil Site
- b) Address: 544 East Main Street, Franklin, NC 28734
- c) Owner: Mainspring Conservation Trust, Inc.

6. Status of history of contamination at the site

- a) The site is contaminated by petroleum.
- b) The subject property was operated as a fuel station since the 1950s, selling kerosene, fuel oil, gasoline, and diesel fuel. Four 30,000-gallon ASTs were located on the property from the 1950's through 2005. Smaller USTs were located on the property during the 1980s through the 1990s. The site was operated as Simpson Oil and Simpson Gas & Oil, Inc. until the company was administratively dissolved in 2010 and was suspended by NC Dept. of Revenue in 2015. Between 2010 and 2015, the property was used as a small gun shop. All AST's, UST's, and known product lines were removed prior to Mainspring's purchase of the property. Mainspring purchased the property and recorded a Brownfield Agreement in November 2017; since that time the building was vacant until it was demolished by Mainspring in summer 2021.
- c) Environmental concerns are petroleum contamination to soil and groundwater. This contamination may impact future users of the property and could impact downgradient ground- and surface-waters such as the nearby ecologically-sensitive Little Tennessee River which is fished by local residents and tourists who frequent the Southern Appalachian mountains.
- d) Based on historical data and more recent soil and groundwater assessments conducted from 2015-2017, it appears that a release of petroleum has occurred from former above- and under- ground storage tanks, product lines, and dispensers on the site. Soil

assessment results indicate that soil contamination (VOC's and SVOC's) is currently present at concentrations that exceed the NCDEQ IHS Industrial / Commercial PSRGs. Groundwater assessment results and models indicate that a dissolved contaminant plume is likely present under the majority of the Simpson Gas and Oil property. The distribution of dissolved contaminants suggests the contaminant plume has likely migrated via advective forces to the east-northeast in the direction of groundwater flow toward the Little Tennessee River.

7. Affirmative statement that the site meets the definition of a brownfield site

The Simpson Gas and Oil site is:

- a) not listed or proposed for listing on the National Priorities List.
- b) not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and
- (c) not subject to the jurisdiction, custody, or control of the United States government.

8. Description of the environmental assessment conducted at the site

The environmental assessments listed below have been conducted at the former Simpson Gas and Oil site, including Phase I ESA, Asbestos and Lead-Based Paint Report, and Phase II equivalent Limited Soil and Groundwater Assessment Reports:

Limited Soil and Groundwater Assessment Report, Former Simpson Gas and Oil Property 544 East Main Street, Franklin, Macon County, North Carolina S&ME Project No. 4341-17-002, May 9, 2017.

Asbestos and Lead-Based Paint Report, Former Simpson Gas and Oil Property 544 East Main Street, Franklin, Macon County, North Carolina S&ME Project No. 4341-17-002, April 24, 2017.

Phase I Environmental Site Assessment (ESA), Former Simpson Gas and Oil Property 544 East Main Street, Franklin, Macon County, North Carolina S&ME Project No. 4341-17-002, February 17, 2017.

9. Information on enforcement or other actions or an affirmation that there are no enforcement or other actions

There are no known ongoing or anticipated environmental enforcement or other actions related to the site.

10. Property-specific determination information or an affirmative statement that a Property-Specific determination is not required

The site does not require a Property Specific Determination.

In email correspondence dated 2/22/2019, the EPA NC UST state coordinator confirmed that the NCDEQ grant files had been reviewed and that no federal LUST Trust Funds had been expended at the Former Simpson Gas and Oil site.

11. Threshold Criteria Related to CERCLA / Petroleum Liability

11. Property Ownership Eligibility - Hazardous Substances Sites

Not applicable.

12. Property Ownership Eligibility - Petroleum Sites

Not applicable

INFORMATION REQUIRED FOR A PETROLEUM SITE ELIGIBILITY DETERMINATION

(1) Current and Immediate Past Owners

The current owner of the site is Mainspring Conservation Trust, Inc. The preceding owner of the site and UST's was Simpson Gas and Oil, Inc.

(2) Acquisition of Site

Mainspring Conservation Trust acquired the property on November 13, 2017 via fee simple purchase.

(3) No Responsible Party for the Site

Mainspring Conservation Trust, Inc. (i.) **did not** dispense or dispose of petroleum or petroleum product contamination or exacerbate the existing petroleum contamination at the site; (ii.) **did not** own the site when any dispensing or disposal of petroleum (by others) took place; and (iii.) **did** take reasonable steps with regard to the contamination at the site.

The immediate past owner, Simpson Gas & Oil Inc.(i.) **did** dispense or dispose of petroleum or petroleum product contamination or exacerbate the existing petroleum contamination at the site; (ii.) **did** own the site when any dispensing or disposal of petroleum (by others) took place; and (iii.) it is undetermined whether or not Simpson Gas and Oil took reasonable steps with regard to the contamination at the site.

(4) Cleaned Up by a Person Not Potentially Liable

Mainspring **did not** dispense or dispose of petroleum or petroleum product or exacerbate the existing petroleum contamination at the site. Mainspring **did** take reasonable steps with regard to contamination of the site by commissioning additional assessment, negotiation of land use restrictions with NC DEQ necessary to enroll the property in the NC Brownfields Program on November 13, 2017.

(5) Judgments, Orders, or Third-Party Suits

The following **do not apply** to the site:

- i. a judgment rendered in a court of law or an administrative order that would require any person to assess, investigate, or clean up the site; or
- ii. an enforcement action by federal or state authorities against any party that would require any person to assess, investigate, or clean up the site; or
- iii. a citizen suit, contribution action, or other third-party claim brought against the current or immediate past owner, that would, if successful, require the assessment, investigation, or cleanup of the site.

(6) Subject to RCRA

The site is **not** subject to any order under section 9003(h) of the Solid Waste Disposal Act.

(7) Financial Viability of Responsible Parties

The immediate past owner, Simpson Gas and Oil Inc. is out of business and is no longer operating. It is Mainspring Conservation Trust's understanding that Simpson Gas and Oil does not have the financial capability to satisfy their obligations under federal or state law to assess, investigate, or clean up the site. There are no known assets of the company, as Mainspring purchased the property. The site was operated as Simpson Oil and Simpson Gas & Oil, Inc. until the company was administratively dissolved in 2010 and was suspended by NC Dept. of Revenue in 2015. Simpson Gas and Oil, Inc. is currently in bankruptcy.

13. Description of Cleanup Authority and Oversight Structure

a. Cleanup Oversight

As a result of Mainspring's successful efforts to enroll the Simpson Gas and Oil site into the NC Brownfields Program on November 13, 2017 and to put in place a Brownfields Agreement and associated Land Use Restrictions, Mainspring will follow terms of the Brownfield Agreement and associated Land Use Restrictions in the cleanup of the site. The Brownfields Agreement also requires that Mainspring develop and follow an EPA- and NCDEQ-approved Environmental Management Plan as we clean up the site. As evidenced by NCDEQ Brownfields' letter of support included in this application, the NC Brownfields Program will provide technical assistance and guidance for the cleanup. Mainspring also plans to hire a qualified, experienced environmental consulting firm to oversee and coordinate the cleanup activities; Mainspring will ensure that the effort complies with Federal CFR, including appropriate competitive procurement provisions prior to beginning cleanup activities.

NCDEQ and Mainspring have a long and mature relationship regarding this site cleanup. NCDEQ, Mainspring, and Region 4 UST and Brownfields Programs have collaborated on this cleanup for several years – the structure of the NC Brownfields Agreement provides experienced technical review and understanding of the sensitive nature of the surrounding area that includes sensitive waters of the Little Tennessee River as well as the need for greenspace and trails as part of the local Master redevelopment plan.

b. Access to Adjacent Properties

Access to adjacent or neighboring properties is not anticipated for site cleanup. If access becomes necessary, however Mainspring has very good working relationships with all property owners adjacent to the site.

14. Community Notification documents

- a. **Draft Analysis of Brownfield Cleanup Alternatives** – presented at a Community Meeting on January 28, 2026 and available for 14 days at the reference desk of the local public library. No comments were received prior to submittal of the grant proposal. Mainspring will follow up with participants prior to EPA's selection of grantees in order to maintain contact and interest with its neighboring landowners, stakeholders, and other interested parties.

- b. **Community Notification Ad** – a community notification ad was placed in the local newspaper (the Franklin Press) on January 14, 2026 and via Facebook on January 13, 2026.
- c. **Public Meeting** – a public meeting was held at the local public library on January 28, 2026.
- d. **Submission of Community Notification Documents** – The project summary and Analysis of Brownfields Cleanup Alternatives are attached to this application.

15. Named Contractors and Subrecipients

Mainspring will follow all Federal Procurement Requirements and will follow procedures per Federal CFR.



NORTH CAROLINA
Environmental Quality

January 21, 2026

JOSH STEIN

Governor

D. REID WILSON

Secretary

MICHAEL SCOTT

Director

Ben Laseter
Deputy Director
Mainspring Conservation Trust, Inc.
577 E Main Street
Franklin, NC 28734
blaseter@mainspringconserves.org

Re: U.S. EPA Brownfields Cleanup Grant – Mainspring Conservation Trust, Inc.

Dear Mr. Laseter,

The North Carolina Department of Environmental Quality (DEQ) Brownfields Redevelopment Section (BRS) acknowledges and supports the Mainspring Conservation Trust's application for a U.S. EPA Brownfields Cleanup Grant for the Simpson Gas and Oil property. We understand that following cleanup efforts, this property will be redeveloped into greenspace and a park to be incorporated into the Nikwasi Mound interpretive center. Revitalization of this property will be a wonderful success for the Town of Franklin through the efforts of Mainspring.

The NC BRS affirms that the Simpson Gas and Oil Site:

- i. Is enrolled in the NC BRS voluntary response program, recorded Notice of Brownfields Property (NBP) # 20064-16-057;
- ii. Mainspring Conservation Trust, Inc. is the identified property owner and Prospective Developer in the recorded NBP with liability protections for known petroleum contaminants as outlined in the NCGS § 130A-310.33 statute.
- iii. Per information provided to the NC BRS as outlined in the Brownfields Agreement, there is a sufficient level of site characterization from the environmental site assessments performed to date for remediation work to begin.

The goal of EPA Assessment funds is to facilitate redevelopment and economic growth within a community. To that end, BRS offers technical project guidance to help ensure assessments conducted utilizing grant funds are in accordance with our program requirements throughout the life of your project. Coordination with DEQ BRS is critical to ensure that the assessments make efficient use of the federal funds awarded. This will begin at grant initiation and continue with review of site-specific assessment plans, which are required as part of the Brownfields Agreement.

We hope that the Mainspring Conservation Trust, Inc. is successfully awarded this grant, and we will continue to support you in your brownfields redevelopment efforts whether a grant is awarded or not. We truly believe successful brownfields projects can rejuvenate a community.

Sincerely,

Jordan Thompson
Brownfields Grants Manager

cc: NCDEQ Brownfields Grant Collaborative Team



North Carolina Department of Environmental Quality | Division of Waste Management
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