



Town Of North Wilkesboro

Post Office Box 218

North Wilkesboro, North Carolina 28659

Bus. (336) 667-7129

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Narrative Information Sheet

- | | |
|-----------------------------|---|
| 1) Applicant Identification | Town of North Wilkesboro
P.O. Box 218
832 Main Street
North Wilkesboro, NC 28659 |
| 2) Website URL | https://www.north-wilkesboro.com |
| 3) Funding Requested | a) Single Site Cleanup
b) 1,768,577.83 |
| 4) Location | North Wilkesboro, NC |
| 5) Property Information | Former Jenkins Wholesale and Smoot Tannery Property
127 Maple Street, North Wilkesboro, NC 28659 |
| 6) Contacts | a) Project Director

Meredith Detsch, CZO
Planning Director
Town of North Wilkesboro
Email: planning@northwilkesboronc.gov
832 Main Street/Mailing: PO Box 218
North Wilkesboro, NC 28659
Office: 336-667-7129 ext. 3011
Cell: 336-466-5275

b) Chief Executive/Highest Ranking Elected Official

Mayor Marc Hauser
Board of Commissioners
Email: mhauser@northwilkesboronc.gov
832 Main Street/Mailing: PO Box 218
North Wilkesboro, NC 2865
Office: 336-667-7129 |
| 7) Population | 4,349 |

8) Other Factors

Other Factor	Page #
Community Population 15,000 or less.	4
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	n/a
The proposed brownfield site(s) is impacted by mine-scarred land.	n/a
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	n/a
The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed 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).	n/a
The proposed site(s) is in a federally designated flood plain.	3
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	n/a
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	n/a
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	3
The target area(s) is impacted by a coal-fired power plant that has recently closed (2014 or later) or is closing.	n/a

9) Releasing Copies of Applications

n/a

North Wilkesboro Brownfield Cleanup Grant Application Narrative

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1.a. Target Area and Brownfields

1.a.i. Overview of Brownfield Challenges and Description of Target Area

The Smoot Tannery (Tannery) site sits in Census Tract 37193960600, just blocks away from the downtown corridor of North Wilkesboro, North Carolina (the Town). It is adjacent to many community assets, such as Smoot Park and the Yadkin River Blueway and Greenway. The Tannery is a prime location for redevelopment into recreational and community facilities to serve a rural town beset with environmental and economic challenges.

The Tannery was a key contributor to the local economy in the early 1900s and employed many residents. The catalyst of the Tannery's degradation was the flood of 1940, which wiped out the tanning operations. Though ironically some contamination from tanning may have been washed away by that event, much of the remaining rubble was simply buried on site. The Tannery's remaining buildings were then occupied by general warehousing and automotive restoration businesses, operating for decades until the death of the most recent owner. For over a decade, the Tannery has been vacant, and the buildings have become increasingly dilapidated. The prior industrial activity has resulted in soil impacts on-site above state criteria for volatiles, petroleum constituents, and metals.

The ruinous state of the buildings has precluded full site characterization, which poses risks to public health and is an impediment to redevelopment. The site previously had tax liens from the Town, County, and IRS (which have since been resolved), and it contributed nothing to the local economy as it remained vacant. Its abandoned, blighted state now hinders downtown revitalization efforts, deters investment, and perpetuates economic stagnation, resulting in lost revenue for the Town and County. The crumbling structures and debris detract from the area's visual appeal and lower nearby property values. Structural instability led the Fire Department to issue "do not enter" placards on several buildings, marking clear safety hazards to the community.

Redeveloping the Tannery is part of a broader strategy to target key properties in and near the downtown corridor for revitalization as outlined in the Town's Downtown Master Plan and River District Plan (collectively, Revitalization Plans). This grant will address contamination and stabilize the site, paving the way for redevelopment essential to the Town's broader goals. Pollutant remediation will mitigate public health risks, enabling future community-centered projects like public green spaces, commercial spaces, or mixed-use developments that align with revitalization plans.

1.a.ii. Description of the Proposed Brownfield Site

The Tannery, located at 127 Maple Street in the Town, spans 3.01 acres and includes approximately 91,206 square feet of collapsing buildings. After a long history of industrial activity, the site sits vacant with contamination from former industrial uses, such as metals from tanning operations and solvent/petroleum impacts from later automotive restoration.

Environmental assessments have identified soil impacts of metals, petroleum constituents, and volatile compounds above applicable state Preliminary Soil Remediation Goals, which pose public health risks. Groundwater contamination is also a concern, with traces of volatile organic compounds and semi-volatile organic compounds linked to past activities. Potential vapor intrusion risks present additional challenges, as volatiles could migrate into indoor air if redevelopment occurs without adequate remediation/mitigation measures.

The site's location near the Yadkin River also raises concerns about the potential impact on local water sources, as the river feeds into drinking water sources for areas as far away as Winston-Salem. In addition to human risk, these impacts threaten the habitats of endangered species near the site, which include the Bog Turtle, Monarch Butterfly, and several migratory bird species.

1.b. Revitalization of the Target Area

1.b.i. Reuse Strategy and Alignment with Revitalization Plans

The projected reuse strategy for the Tannery emerged from the market analysis in the Roadmap to Reuse Plan by Atlas Community Studios (Roadmap to Reuse Plan), and it aligns closely with the Town's Revitalization Plans, transforming this long-overlooked site into a valuable community asset. Of the three options the Roadmap to Reuse Plan presented, two options arose that could be combined for a stronger asset and ideal reuse strategy. A destination recreation facility that ties together indoor and outdoor recreation with food and drink options, and a "Culinary Collective" model that combines a food hall with a restaurant incubator. Creating a destination

recreation facility with a commercial kitchen/food hall would bolster the area with workforce and business development opportunities that will connect with the local community college's culinary graduates and budding outdoor recreation enthusiasts. The redevelopment will create accessible job opportunities, improve public health, and expand access to the Town's parks and greenways.

The Roadmap to Reuse Plan highlights how the two reuse options align with the Town's Revitalization Plans. The reuse will enhance the Town's recreation and tourism assets; increase the connectivity of its neighborhoods, greenways, and trails systems; reactivate a dormant, underutilized decaying property; and enhance the quality of life for Town residents. These impacts align with the priorities of the Revitalization Plans, along with longer term planning documents such as the Town's 25-year comprehensive plan, regional plans such as the Great State of Wilkes (County) Outdoor Action Plan, and targeted plans for other community assets, such as the Smoot Park Master Plan and upcoming Town's Parks Master Plan.

To engage the community on the site's use, the Town launched a robust public outreach campaign to encourage residents to share memories and ideas for the Tannery. Students from EPA Region 4's College/Underserved Community Partnership Program (CUPP) created materials for the Town to inform and engage the public. This included a brochure summarizing the Phase I and II Environmental Site Assessments (ESAs) and an online survey that ran from July through November 2024. Survey information was shared at local events like the Apple Festival and Downtown Merchants Association Spooktacular, both in October 2024. As of November 14, 2024, 85 respondents had completed the survey, adding valuable input into the Tannery's potential reuse.

The Town also held public meetings throughout 2024 on the Tannery project. Key events included Board of Commissioners' reviews of the Road to Reuse Plan on August 22, 2024, and October 17, 2024, and a public input session specifically for the grant application on October 29, 2024. Project Manager Meredith Detsch led further outreach, including surveys distributed in water bills, flyers posted at community centers and businesses, social media and website posts, and direct email invitations to at-risk community groups, phone calls to subscribers and newspaper ads.

Public input has and will continue to inform the final Revitalization Plans. The public meeting on the draft application confirmed that several residents want to see a mixture of uses on the site, including recreation and food offerings, and others cited the potential for connecting the Tannery to greenways and other recreation amenities. The online survey has found a balance of opinions on potential uses with no one option dominating; roughly a fifth of residents want greenspace, a fifth want commercial uses, and another fifth want a mixed-use development. In other recent community meetings, residents have expressed a desire for outdoor amenities including new green spaces, soccer fields, community gardens, yard games, unpaved trails, and a dog park which could be integrated into the site. This feedback will be considered as a final reuse strategy for the Tannery is developed and presented for approval by the Town's governing board in early 2025.

1.b.ii. Outcomes and Benefits of Reuse Strategy

The revitalization of the Tannery will have significant impacts on the Town: stimulating economic growth, improving environmental sustainability, and enhancing community spaces. The project's strategic location near other vital community amenities offers opportunities for mixed-use development, which will attract private investment and support small businesses, creating job opportunities for residents. The increased availability of affordable commercial spaces will encourage entrepreneurship and stimulate economic activity, raising the town's tax base and driving long-term growth.

The cleanup and redevelopment phases will create construction jobs, and new permanent jobs in retail, hospitality, and other sectors will be created upon completion of the redevelopment. The Roadmap to Reuse Plan estimates that the cleanup will facilitate the creation of 93 jobs (64 direct, 7 indirect, and 16 induced) from the construction of a new facility on the Tannery site, and it will drive \$16M in economic output from \$12M in project costs. The economic opportunities from the site's transformation into a collaborative food and recreation hub will be accessible to underserved communities. The reuse strategy will provide tangible benefits for nearby low-income and government-subsidized housing residents, who will gain improved access to greenspaces and community facilities that support physical and mental well-being. Additionally, the redevelopment will create job opportunities within walking distance of working-class residents, directly benefiting the local community.

The Roadmap to Reuse Plan includes recommendations on linking the Tannery to nearby recreational areas. The Town and our sister city, the Town of Wilkesboro are currently seeking grants to enhance the trails

system and construct a bridge over the Yadkin River that will connect greenways on both sides of the river. The Tannery redevelopment would incorporate connections to this growing recreation and transportation network. Green infrastructure elements will be integrated in the site to manage stormwater and reduce flood risks, especially since the site is in a federally designated floodplain. In the wake of recent storm events such as Hurricane Helene, the floodplain status indicates an ever-increasing risk of flooding and its impacts on nearby residents, businesses, and public infrastructure. The local environment is also increasingly threatened, as any contamination at the site has a higher likelihood of contaminating water channels, threatening the Yadkin River and surrounding ecosystems. The project will bolster climate resilience by implementing flood-resilient design measures, such as elevating structures and installing bioswales, to protect against future flood risks.

Addressing environmental justice concerns is a key goal of the project as the Tannery is near low-income populations. The site's Census tract has a median income of \$48,681, significantly lower than NC's median of \$66,186; 16.1% of residents live in poverty compared to the state's 13.3%. Transformation of the site aligns with the Revitalization Plans' and Town Comprehensive Plan goals of increasing quality of life in the area.

1.c. Strategy for Leveraging Resources

1.c.i. Resources Needed for Site Characterization

Previous Phase I and Phase II ESAs at the Tannery site were funded through NC Department of Environmental Quality (NCDEQ). NCDEQ's assessment grant established a foundation for remediation. Should further site characterization be needed, NCDEQ and partners, including the Development Finance Initiative (DFI) and Golden Leaf Foundation, Appalachian Regional Commission (ARC), and NC Department of Commerce can offer additional site evaluation to ensure comprehensive cleanup.

1.c.ii. Resources Needed for Site Remediation

The EPA funding requested in this application is foundational to the Tannery's remediation efforts. Given the site's environmental and logistical challenges—such as its size, location in a floodplain, and known soil and groundwater contamination—the Town is committed to leveraging supplementary funding sources as needed to ensure a comprehensive and effective cleanup. The deteriorated, unsafe, and collapsing structures on the property pose significant accessibility and safety concerns, further complicating remediation activities and heightening the urgency for action to protect the community. The NCDEQ Brownfields Program will continue to play a key role in providing ongoing support and technical expertise, ensuring that cleanup activities meet regulatory standards and align with environmental justice goals.

To cover any remaining remediation costs, state-level brownfields incentives, matching funds, and low-interest loans will be explored. Should unforeseen remediation needs arise, private sector investment will be actively pursued as the site's appeal increases post-cleanup. The Town aims to secure the resources required for a thorough and sustainable cleanup, enabling the site to be safely redeveloped and integrated into the community, while supporting long-term environmental and economic benefits.

1.c.iii. Resources Needed for Site Reuse

In addition to the EPA grant, partnerships with organizations such as the DFI will be key in securing funding to help redevelop the site for commercial and recreational purposes. These collaborations will leverage public and private funding, ensuring a steady flow of resources for redevelopment. Further support will be sought from partners as outlined above. As the site is prepared for redevelopment, these incentives will help bridge any gaps and attract private sector investment.

1.c.iv. Use of Existing Infrastructure

Located in an area of the community key for downtown expansion and redevelopment, the Tannery is well-positioned to utilize existing infrastructure, minimizing the need and costs for extensive new installations. Maple Street connects the Tannery directly to downtown and nearby neighborhoods. Existing roadways running by the site mean there is little need for additional road construction. The site's prior industrial uses provide sufficient existing water and sewer infrastructure to effectively support planned redevelopment and accommodate the resumption of services to the property. The site's location near the Yadkin River and existing stormwater management systems allows for the integration of improved flood mitigation strategies, such as bioswales and stormwater retention. Nearby Smoot Park, Overmountain Victory Trail, and Yadkin River Blueway and Greenway provide accessible recreational areas, which the project aims to connect to the redevelopment. This will enhance

the area’s appeal and encourage active use of public spaces and alternative transportation routes without the need for significant new infrastructure investments.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a. Community Need

2.a.i. The Community’s Need for Funding

With a population of 4,264 in 2012 and 4,349 in 2022, the Town’s growth has been nearly stagnant. While it has modestly improved on some economic and education measures, the Town trails state and national levels:

Year	Median Income		Poverty Rate		Labor Force Participation Rate		Age >=25, w/ less than a H.S. diploma	
	2022	2012	2022	2012	2022	2012	2022	2012
North Wilkesboro	\$36,855	\$24,453	22.0%	37.3%	51.6%	43.1%	21.9%	33.0%
North Carolina	\$66,186	\$57,615	13.3%	16.8%	62.6%	64.2%	10.6%	15.5%
United States	\$75,149	\$65,797	12.5%	14.9%	63.5%	64.7%	10.8%	14.2%

Source: U.S. Census Bureau American Community Survey (ACS) 5-Year Estimates, 2008-2012 and 2018-2022

Given the Town’s low population and slow growth, its municipal budget is commensurately small, providing inadequate local government resources to undertake this site’s cleanup. The FY 2024-25 Community Development budget was just over \$370,000; it would need to be nearly doubled and focused solely to cover the costs of this project over the projected four-year implementation period. The Town’s millage rate of .52 per every \$100 of assessed property value is already high relative to other neighboring jurisdictions, and with the need to maintain affordability for the residents, the Town has limited capacity to raise property taxes.

2.a.ii. Threats to Sensitive Populations

2.a.ii.(1) Health or Welfare of Sensitive Populations

CEJST data indicates that the Tannery is in a Census tract (37193960600) with a significant low-income population. It is in the 95th, 91st, and 86th percentiles for low median income, households in poverty, and households at or below twice the federal poverty level, respectively. According to U.S. Census ACS data, 32% of residents in the tract identify as non-White. 20% of the tract’s residents are 18 years old or younger. While health and welfare statistics cannot be exactly overlaid with these subgroups, the tract’s overall population is experiencing a range of health and welfare issues. Per EJScreen, the tract is in the 93rd, 83rd, and 75th percentiles for heart disease incidence, low life expectancy, and cancer prevalence, respectively. The sampling results of the Phase II ESA identified soil impacts that exceed NCDEQ Residential Preliminary Soil Remediation Goals (PSRGs). Vapor impacts were also identified that will require vapor mitigation. Residents and employees at neighboring businesses, including the Town’s wastewater treatment plant, are near the site daily and exposed to dust, runoff, and vapors. Additionally, this site is within a block of the Town’s most popular park that includes the only public swimming pool and skate park in the County. Entry into the NC DEQ Brownfields Redevelopment Section (BRS) for a Brownfields Agreement will require additional engineering and institutional controls to protect future occupants which is also a component of cleanup grant funding.

The Tannery sits directly within the 100-year flood plain along the Yadkin River, per EJScreen, and the site’s history includes a 1940 flood that wiped out the original tannery. As Hurricane Helene has recently shown, flooding threats in Western NC are increasing and becoming more severe with the impacts of climate change. Mitigation and remediation efforts will prevent existing contaminants from being washed away in future flooding events and impacting nearby residential and commercial properties and waterways.

2.a.ii.(2) Greater than Normal Incidence of Disease and Adverse Health Conditions

This site is currently impacted as outlined above and exposure to these impacts has been shown to increase the risks of cancer and chronic lower respiratory diseases, and to cause damage to the liver and kidneys. The prevalence of cancer in this site’s Census tract is in the 75th percentile, per EJScreen. The 2022 Wilkes County Community Health Assessment found that county-wide mortality from chronic lower respiratory diseases was 50% higher than the State average, while chronic liver disease and cirrhosis deaths were 38% higher. Properly

addressing the site’s impacts will have a positive effect on the incidence and mortality rates among the area’s residents in relation to these health issues.

2.a.ii.(3) Environmental Justice

2.a.ii.(3)(a) Identification of Environmental Justice Issues

CEJST data shows the Tannery is within an identified disadvantaged Census tract. On several measures, the tract is home to various groups that have traditionally experienced disproportionate exposure to environmental threats. The 2020 Census found the tract for the Tannery is one of Wilkes County's most racially and ethnically diverse with the County’s second largest proportion of residents identifying as not White alone (28%) and the third largest Hispanic population (13%). Per CEJST, workforce development statistics show a relatively low-income population, another group historically living in closer proximity to polluted areas. CEJST further confirms the level of legacy pollution and water quality threats faced in this area; the tract is in the 95th percentile for proximity to Risk Management Plan facilities and the 91st percentile for underground storage tanks and releases.

2.a.ii.(3)(b) Advancing Environmental Justice

The site poses significant environmental and community health risks due to both the presence of contaminants and the property’s deteriorated condition, which endangers passersby and attracts potential illicit activities. These conditions also have economic and social impacts on the area by depressing property values, inhibiting nearby economic activity, and diminishing community morale. These impacts are seen in the CDC’s Environmental Justice Index (EJI) rank for the site’s Census tract of 0.94. This score reflects high ranks for Toxic Release Inventory Sites (0.76) and Risk Management Plan Sites (0.91), and a High Pre-existing Chronic Disease Prevalence on all five tracked diseases, including asthma and cancer. Addressing the site’s impacts will reduce contaminants and lead to lower cancer rates and increased life expectancy for the area’s vulnerable populations.

The current reuse strategy of a destination recreation facility will not contribute to the displacement of residents or businesses; instead, it will fill a market gap and create jobs for the community. As noted in the Roadmap to Reuse plan, existing facilities of this type in Wilkes County and a broader 60-minute drive radius are not meeting consumer demand. The proposed reuse will increase demand for goods and services by drawing in out-of-town visitors and supporting the local economy. The project’s moderate scale and strategic location will have a positive impact on the Town while avoiding negative economic effects, such as higher housing or retail costs.

2.b. Community Engagement

2.b.i. and 2.b.ii. Project Involvement and Project Roles

The Town has partnered with many agencies to further site acquisition and redevelopment.

Name of organization/ entity/group	Entity’s mission	Point of contact (name & email)	Specific involvement in the project or assistance provided
NCDEQ Brownfields Redevelopment Section	To work with Brownfields Property Owners to maintain the on-going safe reuse of properties and compliance with recorded Brownfields Agreements and protect human health and the environment.	Jordan Thompson, jordan.thompson@deq.nc.gov	Assisting with Brownfield Agreement and ABCA. Assisting with public meetings. Providing technical guidance on clean up and reuse on the site.
North Wilkesboro Planning Board	An advisory board to the Town Board of Commissioners with Zoning Ordinance amendments and policies’ conformance with the Town's Comprehensive Plan. Commissioners assign special projects to this board.	John Harwell, Planning@northwilkesboronc.gov	Conducting technical reviews and holding meetings on plans before the Board of Commissioners approves them. Can facilitate the review of a small area plan for the site and public input.

North Wilkesboro Board of Commissioners	Town Governing Board has a mayor and five Town Commissioners who identify community needs and commit resources to those needs within the limits of federal and state law.	Marc Hauser (Mayor), mhauser@northwilkesboronc.gov	Holding public input meetings and advising staff through the process. Allocating additional money to ensure the project is successful.
Wilkes Outdoor Action Plan Group	A group of community stakeholders working on economic development of Wilkes' outdoor assets through the adopted Great State of Wilkes Action Plan.	Jenn Wages, jenn@healthywilkes.org	Supporting the redevelopment of the property through review and comment on the Town's plans. Collaborating on post-cleanup funding for recruitment of outdoor business opportunities.
Wilkes Chamber of Commerce	The voice and advocate for business and the hub for communication in Wilkes County.	Linda Cheek, lcheek@wilkesnc.org	Connecting the business community with the Town for outreach and comment on plans for the site.
Wilkes Economic Development Corporation	To facilitate the creation of new jobs and investment in Wilkes County, through the retention and expansion of existing businesses and recruitment of new businesses along with real estate development.	LeeAnn Nixon, lnixon@wilkesedc.com	Connecting the Town with economic development incentives, including assistance with workforce development grant applications. Assisting with post-cleanup site marketing.
Wilkes Tourism Development Authority (WTDA)	To bring overnight travelers to Wilkes County to grow the local economy.	Thomas Salley, tsalley@wilkesboronc.org	Promoting the redevelopment of the site and assisting with attracting businesses and users of the site once cleanup is complete.
Wilkes Soil and Water Conservation District	To foster voluntary, incentive-driven management of soil, water, and related natural resources for the benefit of the environment, economy, and all citizens.	Kayla M. McCoy, [REDACTED]	Assisting with environmental education programs and community outreach. Assisting with post-cleanup environmental grants.

2.b.iii. Incorporating Community Input

The Town will continue to engage the community and conduct outreach through an actively updated website that will have a contact and comment/complaint form, upcoming quarterly meetings schedules and materials, community presentations, and direct links to all relevant materials. Dual English and Spanish text will be available with all meetings and outreach. Monthly social media features, bi-monthly presentations to civic organizations and our Town's boards will incorporate the community's input and status reports. As the Town's nearby park, Smoot Park, undergoes renovations, staff will engage with those patrons and gather feedback. Neighboring property owners will be checked on monthly to hear how they are being impacted.

All feedback including verbal, written, phone calls, emails, and social media comments will be compiled into a matrix and be available for view on the website. Action steps will be formed from the feedback to assist with future development planning and reuse of the property.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3.a. Proposed Cleanup Plan

To adequately prepare the Tannery for redevelopment, option three in the Analysis of Brownfield Cleanup Alternatives (ABCA) is the only viable option for the Town to acquire a pad-ready site for redevelopment. The \$1,701,500 cost estimate (with a full detailed cost estimate provided in the attached ABCA) includes removal of dilapidated structures and slabs that are impeding complete site characterization, abatement of Asbestos-containing material (ACM) and Lead Based Paint (LBP), removal of four inground hydraulic lifts, and additional assessment to further delineate subsurface impacts at the subject property. Complete removal of ACM and LBP

from the site will eliminate future exposure and risks of hazardous materials to the community. The Town will need to conduct a Request for Proposals (RFP) to contract with qualified contractors and qualified environmental professionals (QEP) perform these tasks. The Town is prepared to conduct the proper notifications and uphold all required local, state, and federal procurement standards through 2 CFR Part 200, 2 CFR Part 1500, and 40 CFR Part 33.

During demolition, third party air quality monitoring will be conducted to protect the abatement contractors and the public when removing the LBP and ACM materials. Appropriate permits (e.g., notify before you dig, soil transport/disposal manifests, demolition) will be obtained prior to the work commencing. Federal and State National Emissions Standards for Hazardous Air Pollutant regulations require that notification of any proposed demolition activity that would disturb ACM be provided to the appropriate regulatory agency. The disturbance of lead-containing painted surfaces will be performed in accordance with U.S. EPA-Lead Renovation, Repair and Painting Program (40 CFR 745.80, Subpart E), and addressed in accordance with OSHA Construction Standard for Lead (29 CFR 1926.62). ACM and LBP found on building materials will be disposed of in an approved site for proper handling and disposal. Once ACM and LBP abatement is complete, removal of the four hydraulic lifts and demolition of nearly all buildings and structures is necessary to facilitate the additional environmental assessments of the soils, and to access the site, as many of the structures have collapsed and are unsafe to enter for any testing or soil borings. The only structure to remain is the smokestack at the back of the property as the community has expressed a strong desire to keep it and designate it a national historic landmark.

3.b. Descriptions of Tasks/Activities and Outputs

Project Implementation	Anticipated Schedule	Task Lead	Outputs
Task 1: Cleanup Planning			
<ul style="list-style-type: none"> Develop RFPs for QEP and project management consultant Select QEP and consultant and negotiate contracts Hold kickoff meeting with QEP, Town staff, elected officials, public, and other stakeholders Finalize cleanup plan and scope of work Select cleanup contractor through bid Produce initial project reports to EPA 	Q3 2025 through Q4 2025; will attend Brownfields conference in Q3 2025	Town of North Wilkesboro w/ NCDEQ support	<ul style="list-style-type: none"> RFP for site cleanup contractor Cleanup bid Contracts with QEP and consultant 2 quarterly reports Training and attending 2025 Brownfields Conference
Task 2: Project/Grant Management			
<ul style="list-style-type: none"> Track progress and manage QEP on timely completion of cleanup tasks Financial management, including budgeting, invoice processing/payment, and all necessary reporting Document and report on project activities and accomplishments Travel and training opportunities 	Q1 2026 through Q3 2026	Town of North Wilkesboro w/ NCDEQ and consultant support	<ul style="list-style-type: none"> 3 quarterly reports 2 annual reports Ongoing ACRES reporting 4 public meetings on progress Monthly social media and website posts on the status. Grant close-out report
Task 3: Site Cleanup			
<ul style="list-style-type: none"> Project design specifications for ACM and LBP abatement Preparation of QAPP for abatement & demo and additional assessment Mobilization/site set up 	Q1 2026 through Q2 2026	QEP & Town of North Wilkesboro	<ul style="list-style-type: none"> QAPP Demolished & remediated site Final cleanup report

<ul style="list-style-type: none"> • ACM & LBP abatement • ACM & LBP debris transportation and disposal • Slab removal and disposal • Hydraulic lift removal • Fieldwork • Demobilization/site breakdown • 3rd party air monitoring • Oversight/confirmation survey 			
Task 4: Additional Assessment			
<ul style="list-style-type: none"> • Additional site assessment, including new drilling • Manage Investigation Derived Waste • Analysis of samples and report preparation 	Q2 2026	QEP	<ul style="list-style-type: none"> • Updated site analysis report

3.c. Cost Estimates

Budget Categories*		Project Tasks (\$)				Total
		Cleanup Planning	Project/Grant Management	Site Cleanup	Additional Assessment	
Direct Costs	Personnel	\$13,372.84	\$11,523.33			\$24,896.17
	Fringe Benefits	\$4,680.49	\$4,033.17			\$8,713.66
	Travel	\$3,468.00				\$3,468.00
	Contractual		\$30,000.00	\$1,647,500.00	\$54,000.00	\$1,731,500.00
Total Direct Costs		\$21,521.33	\$45,556.50	\$1,647,500.00	\$54,000.00	\$1,768,577.83
Indirect Costs						
Total Budget (Total Direct Costs + Indirect Costs)		\$21,521.33	\$45,556.50	\$1,647,500.00	\$54,000.00	\$1,768,577.83**

*There are no costs for the Equipment, Supplies, Construction, or Other categories, which are thus deleted.

**Budget adjustments due to unforeseen circumstances will be accommodated through changes of program plans and altered scopes of work as necessary and approved by the EPA and will not exceed a 10% cost change in costs.

Task 1 Cleanup Planning – Personnel costs are calculated as follows:

Employee	Hourly Rate	Hours / Week	Weeks	All Hours	Total Salary	Fringe (35%)
Meredith Detsch	\$38.30	8	26	208	\$7,966.40	\$2,788.24
Holly Minton	\$54.25	2	26	52	\$2,821.00	\$987.35
Joseph Kamperman	\$24.86	4	26	104	\$2,585.44	\$904.90
TOTALS					\$13,372.84	\$4,680.49

Task 2 Project/Grant Management – Personnel costs are calculated as follows:

Employee	Hourly Rate	Hours / Week	Weeks	All Hours	Total Salary	Fringe (35%)
Meredith Detsch	\$38.30	5	39	195	\$7,468.50	\$2,613.98
Holly Minton	\$54.25	1	39	39	\$2,115.75	\$740.51
Joseph Kamperman	\$24.86	2	39	78	\$1,939.08	\$678.68
TOTALS					\$11,523.33	\$4,033.17

Travel: to attend Brownfields 2025 conference in Chicago: **Airfare:** \$449 one-way (\$898 round-trip); **Meals/expenses:** \$69 per diem 1st day and 3rd day of trip, \$92 per diem 2nd day = \$230 for three days. **Lodging:** August 2025 rate \$202 x 3 nights = \$606 for 3 days. **Total travel:** \$1,734 per person x 2 attendees = **\$3,468.00.**

Contractual: The Town estimates a cost of \$30,000 to contract with a third-party consultant to supplement staff capacity for project management, financial reporting, and administrative reporting.

Task 3 Site Cleanup – Per the ABCA, estimated costs are: 1) Project Design Specifications for ACM and LBP Abatement - \$6,000; 2) Preparation of QAPP - \$4,000, 3) Mobilization/Site Set Up - \$30,000; 4) ACM & LBP Abatement (1 month) - \$500,000; 5) ACM & LBP Debris Transportation and Disposal - \$450,000; 6) Slab Removal and Disposal (85,000sq ft, 1' thick) - \$175,000; 7) Hydraulic Lift Removal (3 days) - \$12,500; 8) Fieldwork (6 weeks) - \$400,000; 9) Demobilization/Site Breakdown - \$15,000, 10) 3rd Party Air Monitoring (5 weeks, 25 days) - \$20,000; 11) Oversight/Confirmation Survey - \$35,000

Task 4 Additional Assessment – Per the ABCA, estimated costs are: 1) Additional Assessment (Labor) - \$14,000; 2) Additional Assessment (Drilling) - \$14,000; 3) IDW Management - \$4,000; 4) Analytical - \$14,000; 5) Report Preparation - \$8,000

3.d. Plan to Measure and Evaluate Environmental Progress and Results

The Town's project team, working closely with the QEP and cleanup contractor, will conduct biweekly meetings to ensure tasks are completed within the work scope, and to provide updated budgets, timelines, and outstanding task lists, all accessible to the team for live project status tracking. Quarterly reports to the EPA will include budget and timeline updates, and progress within the project schedule. Any discrepancies will be addressed by the project manager and QEP promptly to keep the project on time and within budget.

The selected cleanup method, Building Demolition, ACM and LBP Abatement, and Debris Removal with Offsite Disposal (ABCA Alternative #3), will include necessary air, water, and noise monitoring during and following cleanup. Given the site's location in a floodplain and proximity to the Yadkin River, we will monitor the area closely for any environmental impacts.

During the cleanup, the team will track metrics, including the property area remediated, tonnage of contaminated materials removed, active staff count, created jobs, public interactions and feedback, outstanding invoices, and current costs. These data will support EPA reports and biannual community updates. Following cleanup and any remaining assessment, the Town will ready the property for redevelopment, gathering additional public input and pursuing workforce and economic development grants to fund the reuse.

In coordination with the voluntary NCDEQ Brownfield Agreement, all covenants and land restrictions will be honored in future development. Any monitoring wells or systems that remain will be checked annually by a QEP to ensure continued compliance and safety.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4.a. Programmatic Capability

4.a.i. Organizational Structure

The Town was incorporated 1891 and is governed through an entrepreneurial spirit that is still strong today. The Town maintains a fiscally conservative approach to every year's budget and a fund balance that is well above the State's requirements. The Finance team administers numerous state, federal, and private grants to bolster services to citizens. To augment staff capacity, a third-party consultant through an RFP will be brought in to assist with technical and administrative requirements. The Town conducts yearly third-party audits, per State requirements, and has a proven track record of clean audits, equipping the Town to successfully produce a Single Audit, per 2 CFR 200 audit requirements. The Planning Director worked with NCDEQ over the last two years on the DEQ Assessment Grant, which resulted in site characterization and application of the property to the NCDEQ Brownfield Redevelopment Section for an eventual Brownfields Agreement. The Town Manager and Planning Director are adept at applying for, managing, and closing out grants. The administrative team listed below will be able to fully execute the grant requirements in conjunction with the Town Finance staff.

4.a.ii. Description of Key Staff

Planning Director (Project Manager) - Meredith Detsch will provide general grant management activities and daily tasks. She worked on several private and state grants in North and South Carolina and is well equipped to administer this grant. Detsch worked with NCDEQ for the past two years on the grant administration of the MARC on the site, which included coordination with contractors, public outreach, training, presenting to various

groups, and becoming familiar with the supporting documents including the ESA I & ESA II. Detsch will oversee contractor activities and ensure quality control for all tasks.

Town Manager (Program Manager) - Holly Minton has worked in the public sector for more than twelve years, securing funding and successfully executing grants for the organizations' needs. She has a proven track record of advancing large community projects and recently secured over \$6 million to upgrade the Town's Fire Department and flagship community park, Smoot Park, that is near the Tannery.

Planner – Joseph Kamperman has worked in various local government agencies for nine years. He has received and managed several private grants focused on quality of life and landscaping improvements.

4.a.iii. Acquiring Additional Resources

The Town's procurement policy is derived from the state's requirements and adheres to all necessary procurement requirements, which will dictate the competitive Request for Proposals (RFP) process for the Tannery site work. Contractors will adhere to the approved scope of work and follow direction from the Town. Qualified contractors will be locally sourced if available but may require looking at a regional level and preference will be given to Disadvantaged Business Enterprise (DBE) contractors in our area.

Over the past five years, the Wilkes Outdoor Action team has worked with numerous agencies including the Towns of Wilkesboro and North Wilkesboro, Wilkes County, Wilkes County Health Department, EDC, and non-profits like Greenway Council and Health Foundation. This action group is focused on community healthy living, promoting outdoor assets, and creating jobs that support our outdoor economy. The adopted plan, The Great State of Wilkes Outdoor Action Plan, is a 15-year roadmap to grow the outdoor economy and encourage active living in the County, and the proposed site reuse aligns with its strategies. The Town will also utilize the Roadmap to Reuse Plan for the site to secure additional funding opportunities to execute the redevelopment.

4.b. Past Performance and Accomplishments

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

4.b.ii.(1) Purpose and Accomplishments

The Town has successfully received and managed numerous federal, state, and private grants. In the past three years, the Project and Program Managers have secured and successfully managed several notable grants.

Lowe's Hometown Grant, Smoot Park Inclusive Play Equipment (\$325,000), May 2022 - The Town procured a contractor to install the inclusive play equipment, significantly improving our youth's lives. Partnerships with our local Lowe's stores allowed volunteers to install landscaping and beautify the park. This grant is completed and in compliance.

Accessibility for Parks (AFP) (\$500,000), 2022 - This grant is ongoing and has attracted additional funding of over \$3.5M that has been allocated to the park renovations. The focus on inclusivity and accessibility continues into the other assets of the Town's parks including trail systems, the public swimming pool, pool house, upgraded river access for commercial outfitters, and other play amenities.

FEMA Staffing for Adequate Fire and Emergency Response (SAFER) (\$527,250), 2019 - This 4-year award funded the salaries of four new part-time firefighters, a volunteer firefighter recruiting program, and related expenses. The Town administered the grant, recruited and hired positions, and adequately met grant requirements over the timeframe. The Town has since secured another SAFER grant for \$477,000, to continue these efforts with retention and recruitment.

4.b.ii.(2) Compliance with Grant Requirements

The Town has met all the requirements and completed the workplans of the grants listed above and more through numerous federal, state, private, and non-profit entities. The Town utilizes financial software to track expenditures, invoice, and create reports including budget to actual which ensures strict budget compliance. The Town will conduct clear communication with the EPA to ensure the project stays on schedule and within budget. The Town is equipped to track expenses and time, provide invoicing and disbursement requests, submit all needed reporting, and conduct continuous monitoring of the site during the grant and after it is closed out to ensure successful completion.

North Wilkesboro Brownfields Cleanup Grant Application - Threshold Criteria for Cleanup Grants

1. Applicant Eligibility

- a) The Town of North Wilkesboro affirms it is eligible for an EPA Clean-up Grant, as a General Purpose Unit of Local Government. The town was incorporated on March 4, 1891, and is a *Local government* as defined by 2 CFR § 200.1.
- b) The Town of North Wilkesboro is a unit of local government, thus section 501(c)(4) of the Internal Revenue Code does not apply.

2. Previously Awarded Cleanup Grants

The Town of North Wilkesboro affirms that it has not received funding from a previously awarded EPA Brownfields Cleanup Grant for the proposed site.

3. Expenditure of Existing Multipurpose Grant Funds

The Town of North Wilkesboro affirms that it does not have an open EPA Brownfields Multipurpose Grant.

4. Site Ownership

The Town of North Wilkesboro is the sole owner through a deed in fee simple of the Former Jenkins Wholesale and Smoot Tannery Property, as defined in the Wilkes County Register of Deeds (Deed Book 1406, Page 185, Instrument # 7658) recorded on November 13, 2024.

5. Basic Site Information

- a) Name of the site: Former Jenkins Wholesale and Smoot Tannery Property
- b) Address: 127 Maple Street, North Wilkesboro, NC 28659

6. Status and History of Contamination at the Site.

The 3.01-acre Former Jenkins Wholesale and Smoot Tannery site is in a commercial/industrial area of North Wilkesboro. The site was occupied by a tannery from 1897 to 1940 under the names C.C. Smoot & Sons Tannery (Smoot Tannery, 1897-1925) and International Shoe Company (1925 – 1940). Most of the tannery operations were destroyed by a flood and fire in 1940. Jenkins Wholesale Supply Company (Jenkins) moved into the property in the 1950s and remained until the early 2000s. Jenkins included an automobile restoration business known as Jenkins Properties, Inc. Antique Auto Sales & Restorations. The site is now vacant, with six dilapidated office and warehouse buildings. Reconnaissance at the site indicates both hazardous substances and petroleum contaminants, with hazardous substances as the predominant contaminant.

Historical tanning operations and processes included soaking hides in vats containing solutions that included chromium and arsenic. Site maps depict former presence of vats and tanks which likely contained these chemicals, as well as rail spurs which may have been used to transport the chemicals to the site. Based on known chemicals historically used during tanning operations, like chromium and arsenic, and the former presence of tanning infrastructure at the property, the former presence of Smoot Tannery is a Recognized Environmental Condition (REC).

An April 1994 Tank Closure Report indicated that one 1,000-gallon and one 2,000-gallon

gasoline Underground Storage Tank (UST) were removed in July 1993, from the northern site boundary. The tanks were from two separate tank pits with a fuel dispenser in the middle. The USTs were buried beneath 1- to 2-feet of fill material consisting of bricks and timbers; no evidence of other debris or municipal waste was observed. Following removal of the tanks, six of eight soil samples from the tank pits identified total petroleum hydrocarbons (TPH) above applicable standards. The soil excavated during the tank removal was used to backfill the excavations. A UST Closure Report in August 1994 indicated that based on the results of the 1993 soil samples, the petroleum-affected soils were removed from the UST excavations and disposed off-site in June 1994. During removal of the affected soils, the two excavations were merged into one. In February 2020, the NCDEQ issued a No Further Action (NFA) Status for the two USTs, stating the soil samples did not exceed the lower of the soil-to-water or residential Maximum Soil Contaminant Concentrations (MSCCs). Based on the regulatory status, the two USTs were considered to be a historical REC (HREC) during the April 2023 Phase I ESA. If any orphaned USTs are found on the site, they will be removed as part of the cleanup plan.

Automotive restoration activities conducted on the site through the Jenkins Properties, Inc. Antique Auto Sales & Restorations service commonly use solvents and petroleum products during operations. The site contains three in-ground hydraulic lifts, eight Aboveground Storage Tanks (ASTs) with unknown contents, a paint mixing room with a hazardous waste drum, several unlabeled drums with contents unknown, a parts washer, and numerous vehicles in various states of disrepair. The ASTs, drums, vehicles, and containers with automotive related liquids are identified as RECs; the lifts and drains are also identified as RECs.

Since tanning operations largely ceased in 1940, minimal evidence of the operations was observed during the Phase I ESA, other than those described above. Most observations are likely attributed to the Jenkins Properties, Inc. Antique Auto Sales and Restoration operations. Based on review of available historical files for the site, the following potential contaminants of concern (CoCs) have been identified: Volatile Organic Compounds (VOCs), including but not limited to petroleum-related constituents including benzene, methyl-tert-butyl ether (MTBE), and naphthalene, semi-volatile organic compounds (SVOCs), metals, and polychlorinated biphenyls (PCBs).

7. Brownfields Site Definition

The Town of North Wilkesboro affirms that the site is a real property that contains hazardous substances, like pollutants or contaminants, that complicates efforts to expand, redevelop or reuse the property. The site is not listed or proposed for listing on the National Priorities List (NPL). The site is not subject to unilateral administration orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA. The site is not subject to the jurisdiction, custody, or control of the U.S. government.

8. Environmental Assessment Required for Cleanup Proposals.

WSP performed a Brownfields Site Assessment in August 2023 to evaluate potential impacts of previous tannery and automotive restoration operations at the subject Site. The assessment activities included the advancement and sampling of 10 soil borings via direct push technology (DPT), the advancement and sampling of 5 soil borings via hand auger, the

installation and sampling of 9 soil-gas sampling points, the installation and sampling of 5 monitoring wells, and the sampling of 1 existing monitoring well. A Brownfields Site Assessment Report for the assessment activities performed at the Former Jenkins Wholesale and Smoot Tannery Property was prepared and submitted to the NCDEQ Brownfields Section by WSP USA E & I Inc. (dated January 31, 2024).

WSP performed an additional Brownfields Site Assessment in June 2024 to further evaluate potential impacts of previous activities at the subject Site. The assessment activities included the advancement and installation of a methane monitoring point via hand auger and two rounds of methane screening to identify potential methane release from the buried debris. A Report of Methane Screening for the assessment activities performed at the Former Jenkins Wholesale and Smoot Tannery Property was prepared and submitted to the NCDEQ Brownfields Section by WSP USA E & I Inc. (dated July 17, 2024).

The scope of work for the Phase II related Brownfields Site Assessment was outlined in WSP's July 2023 QAPP for Site Assessment, consisted of 15 soil borings, 9 soil-gas points and 6 monitoring wells. The Brownfields Site Assessment was conducted for the site by WSP USA Environmental Infrastructure Inc. in August 2023, and a Brownfields Site Assessment Report relative to Phase II Environmental Assessment activities was submitted by WSP, dated January 31, 2024.

9. Site Characterization

See Attachment A from the NC Department of Environmental Quality, Brownfields Redevelopment Section (BRS), affirming the Smoot Tannery site in North Wilkesboro is eligible to be enrolled in the BRS voluntary response program, is currently applying to be enrolled in the BRS voluntary response program, and that the site has had sufficient site characterization for remediation work to begin.

10. Enforcement or Other Actions

The Town of North Wilkesboro affirms there is no known ongoing or anticipated environmental enforcement or other actions relating to the site for which Brownfields Grant funding is sought.

11. Sites Requiring a Property-Specific Determination.

The Town of North Wilkesboro affirms the site does not need a Property-Specific Determination, as it is not considered a special class of property under CERCLA Section 104(k).

12. Threshold Criteria Related to CERCLA/Petroleum Liability

The site is believed to be commingled with hazardous substances and petroleum, with hazardous substances being the predominant contaminant. The Town of North Wilkesboro is applying for hazardous substances funding and responding to the relevant section under subpart (a).

a. Property Ownership Eligibility – Hazardous Substance Sites

i. EXEMPTIONS TO CERCLA LIABILITY

(3) Property Acquired Under Certain Circumstances by Units of State and Local Government

The Town of North Wilkesboro believes it qualifies as exempt from CERCLA

Liability per CERCLA § 1010(20)(D), as a local unit of government that acquired the property by a combination of escheat and intergovernmental transfer. The most recent property owner, Lewis Hill Jenkins Sr., 87, passed away on October 31, 2013, with no heirs and defunct corporation, thus the property is abandoned. The site had several liens from the Town, County, and the IRS. Those liens have since been paid, waived, or expunged. The town obtained the property as the highest bidder in a public auction on October 31, 2024, securing the deed to the property on November 13, 2024. All recorded disposal of hazardous substances is associated with the previous owners and the tannery and automotive restoration operations that occurred in the late 1800s and early to mid-1900s. The town affirms it has not caused or contributed to any release of hazardous substances at the site. The town affirms it has not at any time arranged for the disposal of hazardous substances at the site, nor has it transported hazardous substances to the site.

13. Cleanup Authority and Oversight Structure

- a) The deteriorating condition of the site poses significant safety hazards, including risk of injury from unstable structures and exposure to contaminants; the neglected site is also susceptible to unwanted activities, contributing to social issues within the community. The Town is committed to addressing these safety concerns to improve the overall well-being of the community.

The Town maintains a close relationship with the NCDEQ Brownfields Program and has and will continue to rely on its expertise during the cleanup process. The Brownfields Agreement with NCDEQ will dictate areas on the site that need to be capped or cleaned up. The Town will be responsible for overseeing the cleanup activities on the site, including hiring contractors, managing schedules, and ensuring compliance with local, state, and federal regulations. The Town will also incorporate technical assistance from a project manager or environmental consultant specializing in brownfield cleanup. This process will be completed through a formal competitive bid process. The successful consultant will follow federal requirements for all procurements including fair labor laws and the Davis Bacon Act.

- b) Cleanup activities will not extend beyond the boundaries of the proposed site and the entire property is accessible from the main road or from an alleyway. The Town owns the property to the south of the site if access is needed from that direction. Town will secure (through the hired consultant) a stormwater and land disturbance permit through the North Carolina Department of Environmental Quality (NCDEQ) which will ensure that run-off and other migration of contaminants are contained properly through demolition and any related construction activities.

Additionally, this site is in a federally regulated floodplain and in close proximity to the Yadkin River. We will be requiring extra run-off mitigation measures be put into place including silt fencing and other required site-specific needed materials to catch sediment and debris. Town staff monitors the river gauges on the Yadkin River and tracks any significant increases in the levels to prepare response for flooding in the area.

14. Community Notification

a) Draft Analysis of Brownfield Cleanup Alternatives

The Town has published the grant application on their social platforms, website and held a public input meeting on October 29, 2024, to receive feedback. Included in the draft grant application, the ABCA is available for comment and other supporting documents the town has been working on. These documents include an economic development study on the site and various publications for outreach the Region 4 EPA CUPP interns created for the Town of North Wilkesboro.

b) Community Notification Ad

The Town of North Wilkesboro advertised the community input meeting on October 17th and 24th in the local newspaper. Social media platforms started advertising the event and grant application on October 10th.

c) Public Meeting

The public meeting for comment on the draft application was held on October 29, 2024, at 5:30PM, in the Commissioners Board Room at 212 9th Street, North Wilkesboro, NC 28659. 21 Town residents attended and listened to a presentation by Town staff on the history of the site and a summary of the Brownfields Cleanup Grant application. The residents then participated in a discussion wherein they provided feedback on site, primarily around the potential reuse strategy. Attachment D summarizes those comments and how the application does or does not incorporate them.

d) Submission of Community Notification Documents

The following documents are included as attachments below:

- The site's ABCA – Attachment B
- A copy of the newspaper ads for the public meeting – Attachment C
- A summary of the public comments and the responses to them – Attachment D
- The meeting notes – Attachment E
- Meeting presentation – Attachment F
- The meeting sign-in sheet – Attachment G

15. Contractors and Named Subrecipients

• Contractors.

The Town of North Wilkesboro has not identified or procured contractors specific to this project. However, the Town does have Master Service Agreements with five qualified engineering firms to provide on-call multi-disciplined professional engineering services to the town. The Town *may* choose to use any of these contractors for this project, if appropriate.

The procurement process followed to secure the on-call engineering services included a Request for Qualifications that was issued in January 2024 and MSAs were executed in April 2024. The procurement was governed by and in accordance with all laws of the State of NC and the Code of Ordinances of the Town of Wilkesboro. All on-call engineering agreements include terms and provisions requiring that any funding from a federal source, whether in whole or in part will require adherence to Federal Uniform Guidance, pursuant to 2 CFR Section 200.326 and 2 CFR Part 200, and that the following

provisions will also apply: Equal Employment Opportunity (41 C.F.R. Part 60), Davis-Bacon Act (40 U.S.C. 3141-3148), Copeland “Anti-Kickback” Act (40 U.S.C. 3145), Contract Work Hours and Safety Standards Act (40 U.S.C. 3701-3708), Clean Air Act (42 U.S.C. 7401-7671q), Federal Water Pollution Control Act (33 U.S.C.1251-1387), Debarment and Suspension (Executive Orders 12549 and 12689), Byrd Anti-Lobbying Amendment (31 U.S.C.1352), Procurement of Recovered Materials (2 C.F.R. § 200.322), and Record Retention Requirements (2 C.F.R. § 200.324)

- **Named Subrecipients.**

N/A

NORTH CAROLINA
Environmental Quality

October 31, 2024

ROY COOPER

Governor

MARY PENNY KELLEY

Secretary

MICHAEL SCOTT

Director

Meredith Detsch
Planning Director
Town of North Wilkesboro
832 Main Street
North Wilkesboro, NC
planning@northwilkesboronc.gov

Re: U.S. EPA Brownfields Cleanup Grant – Smoot Tannery

Dear Ms. Detsch,

The North Carolina Department of Environmental Quality, Brownfields Redevelopment Section (DEQ BRS) acknowledges that the Town of North Wilkesboro plans to conduct the cleanup of a brownfield site and is applying for an FY25 EPA Brownfields Cleanup Grant.

The Town of North Wilkesboro has developed an application requesting site-specific federal Brownfields Cleanup funding for the former Smoot Tannery property identified as Parcel No. 3868-93-4975 located on Maple Street in North Wilkesboro, Wilkes County, North Carolina.

BRS affirms that Town of North Wilkesboro and specifically the Smoot Tannery property:

- i. Is eligible to be enrolled in the Brownfields Redevelopment Section's voluntary response program;
- ii. Is currently applying to be enrolled in the Brownfield Redevelopment Section's voluntary response program;
- iii. Has had a sufficient level of site characterization from the environmental site assessments performed to date for the remediation work to begin on the site.

We hope that the Town 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. For any questions regarding this letter, please contact Ms. Jordan Thompson at 704-223-6549 or Jordan.thompson@deq.nc.gov.

Sincerely,

Jordan Thompson
Project Manager, DEQ BRS

cc: NCDEQ Brownfields Public Outreach Team

