

SCHOOL DISTRICT NO. 393

P.O. Box 267
Silverton, Idaho 83867

R10-26-C-002

Office of Superintendent
Phone: (208) 753-4515
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Application Information Sheet

B.1. Applicant Identification

Wallace School District #393
501 Western Ave
Silverton, ID 83867

B.2. Website URL: <https://www.wsd393.org>

B.3. Funding Requested

- a. Grant Type: Single Site Cleanup
- b. Federal Funds Requested: \$4,000,000

B.4. Location

- a. City of Wallace
- b. Shoshone County
- c. Idaho

B.5. Property Information

Wallace Civic Auditorium
415 River Street
Wallace, ID 83873
See attached map depicting the site.

B.6. Contacts

- a. Project Director
Todd Howard, Superintendent/Federal Programs Director
Wallace School District #393
208-753-4515
thoward@wsd393.org
501 Western Ave, Silverton, ID 83867

- b. Chief Executive/Highest Ranking Elected Official
Anna Berger, Chairman
Board of Education of Wallace School District No. 393
208-659-5625
aberger@wsd393.org
501 Western Ave, Silverton, ID 83867

B.7. Population

WSD #393 serves approximately 500 students from the communities of Wallace, Silverton, Osburn, Prichard & Murray, Idaho, with a combined population of 4,753 residents¹.

B.8. Other Factors

Other Factors	Page #
Community population is 15,000 or less.	1
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	n/a
The proposed 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 project/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	3,4
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).	1,3
The proposed site(s) is in a federally designated flood plain.	3
The reuse of the proposed site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	n/a
The reuse of the proposed site(s) will incorporate energy efficiency measures.	3
The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters.	3
The target area(s) is impacted by a coal-fired power plant that has recently closed (2015 or later) or is closing.	n/a

B.9. Releasing Copies of Applications

Not Applicable.

¹ National Center for Education Statistics, <https://nces.ed.gov/Programs/Edge/ACSDashboard/1603300#nation>

Attachment to Application
Information Sheet



Wallace Jr./Sr. High School (Adjacent to the Site)



Wallace Civic Auditorium Site



Wallace Carnegie Library (Adjacent to the Site)



Interstate - 90
South Fork CDA River

Wallace Jr./Sr.
High School

Wallace Civic
Auditorium Site

Wallace
Carnegie
Library

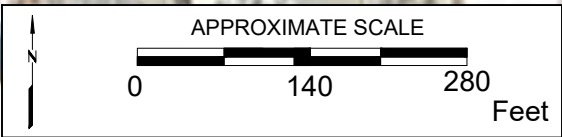
River St

4th St

Residential
Area

Downtown
Core

City of Wallace, ID



Wallace School District (WSD) #393 Brownfield Cleanup Grant Application Narrative

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1.a. Overview of Brownfield Challenges and Description of Target Area: The City of **Wallace, Idaho** (City; pop. ~825) is a **small historic mining community** located in Shoshone County (pop. ~13,700). Situated at the heart of the Idaho Panhandle in the northern Rocky Mountains, the City is nestled in the Silver Valley between the Coeur d'Alene (CDA) River and surrounding mountains; 49 miles east of CDA and 118 miles west of Missoula, Montana.

In the 1880s, a gold rush drew nearly 8,000 miners to stake claims in the nearby mountains. During this time, Wallace grew rapidly, until 1890 when it was consumed by a devastating fire. After the fire, the City was rebuilt under new fireproof building codes, with ornate masonry buildings constructed to serve both the miners and the mine owners. Banks and offices thrived alongside brothels, saloons, and gambling halls.

In the 1900s, Wallace prospered and continued to grow as lead production surged during WWI and WWII. However, after the wartime boom, the town and surrounding area faced **decades of economic volatility** due to fluctuating metal prices. By the 1970s, rising production costs and depletion of high-grade ore led to **widespread mine closures**, marking the start of a prolonged decline for Wallace and the Silver Valley. During this era, the community faced additional challenges including plans to route Interstate 90 (I-90) through Wallace's historic center which drove residents to establish the Wallace National Register Historic District in 1979. At the same time, decades of mining had left the entire Silver Valley with **extensive metals contamination** and, in 1983, the Bunker Hill Smelter and nearby communities, including Wallace, were designated as the Bunker Hill Superfund Site (BHSS), triggering one of the largest cleanup efforts in the nation.

The collapse of the mining economy coupled with the area's Superfund designation has constrained redevelopment, deterred investment, and caused economic stagnation. Over half of the land within the City limits (219 acres) is undeveloped with several vacant parcels and underutilized and deteriorating buildings, such as the Wallace Civic Auditorium (the Site), within the City's historic downtown and adjoining neighborhoods (Target Area; TA). These brownfields highlight the **impacts of widespread environmental contamination and disinvestment**. They compromise community health, diminish property values, and undermine tourism and economic revitalization efforts central to the community's future.

The entire City (including the Site and the TA) is listed on the National Register of Historic Places, the only City in the western US with this designation. Wallace's distinctive character is one of its most valuable assets and its heritage as a mining center and nationally recognized historic district creates a sense of place that attracts residents, businesses, and visitors. This grant will eliminate a longstanding environmental and safety hazard, reduce blight, and **enable the community to revitalize a key property within the TA and a gateway to the historic downtown**.

1.b. Description of the Proposed Brownfield Site: The Site is a **1.1-acre parcel prominently located at 415 River St. in the TA** at the edge of a historic neighborhood and within the BHSS. It is bordered by the South Fork of the CDA River and is 100 ft from I-90, making it highly visible to residents and visitors throughout the Silver Valley. Most of the Site is occupied by the **~24,000 sq. ft., 2-story masonry Civic Auditorium** building, with a large auditorium (built in 1946) and attached academic wing (built in 1959). The rest of the Site is a parking lot for the adjacent Jr./Sr. High School. The decaying condition of the Site building contrasts sharply with the neighboring Wallace Carnegie Library (built in 1911) and the City's well-preserved historic district. Originally owned by the City, the Site was transferred to the Wallace School District (WSD) in 1957 and served as a high school/civic auditorium until 2003 when the new Jr./Sr. High School was constructed. From 2003 to 2014, the Site operated as a civic center until it was closed in 2021 due to health and safety concerns. Today, the Site building is vacant and in extremely poor condition.

The Site is a priority brownfield due to the **confirmed presence of hazardous building materials (HBM) and structural deterioration** that directly impede reuse. A 2025 HBM survey identified friable asbestos, lead-based paint, mold, mercury-containing fixtures, and metal-contaminated structural concrete throughout the building. An estimated 75,000 sq. ft. of friable and non-friable asbestos-containing materials

(ACMs), including mastic, vinyl flooring, gypsum ceiling board, and exterior paint, were documented. Additional presumed ACMs include chalkboards and associated mastic, pipe insulation, mudded fittings, boiler insulation, and built-up roofing. Many of these materials are damaged or significantly damaged. Widespread peeling and flaking lead-based paint was found on surfaces throughout the Site building. Lead was detected in structural concrete at concentrations up to 7,200 mg/kg. Extensive water damage and mold growth are also present. These environmental hazards are also compounded by **significant structural risks**.

A 2026 Structural Condition Assessment (SCA) found that the building's 1940 bowstring trusses have failed, creating a **severe risk of collapse** and making asbestos-containing roofing and gypsum board extremely dangerous to remove. The SCA also indicates that stabilizing metal-contaminated concrete in place would be costly and require substantial repair, and that HBM abatement without removing the entire building may not fully resolve the building's environmental and structural hazards.

Based on these assessments, partial abatement or in-place management is neither feasible nor protective. Complete **building removal is the only practical, safe, and cost-effective way to eliminate Site hazards**. WSD will use grant funds to remove the contaminated Site building and enable safe site reuse.

*1.c **Reuse Strategy and Alignment with Revitalization Plan***: For more than a century, the Site has served as a community gathering place, beginning as a baseball field and city park in 1901 and later, with the construction of the Auditorium, as a WWII memorial. Since the 1940s, the Site hosted public gatherings, tournaments, and performances, housed the local high school, and stood as a symbol of the community's resilience and rich history. The proposed reuse will transform the Site into a community space once again, this time as a **public park designed to support educational and cultural opportunities for all ages**.

Because the Site sits next to the Jr./Sr. High School and Carnegie Library, it creates a unique opportunity to integrate educational programming into the reuse plan. The proposed park will act as an **open-air classroom**, with flexible spaces for science classes conducting environmental studies, history lessons exploring Wallace's mining heritage, and performing arts programs utilizing the amphitheater for music and drama. The park will serve as an **extension of the school campus, fostering experiential learning and interdisciplinary education** while promoting healthy, active engagement for students and the public.

The reuse strategy was shaped through meaningful public engagement. In 2022, WSD convened the Civic Auditorium Committee (CAC) and later the Wallace Civic Memorial Auditorium Committee, comprised of school staff, parents, patrons, and community members. After a 2022 evaluation found significant water intrusion, flooding, mold, roof rot, and structural failures, the CAC developed possible reuse options and conducted a community survey which revealed strong support for a new auditorium or a park.

In 2025, WSD partnered with the Idaho Department of Environmental Quality (DEQ) Brownfield Revitalization Program (BRP) to host outreach and visioning sessions. WSD gathered input from nearly 250 respondents through questionnaires, social media, and in-person events such as the Wallace All-Class Reunion. Respondents expressed a desire for **family-friendly spaces, youth activities, outdoor education, historical preservation, and healthy environments** and favored a mining- or history-themed park to honor Wallace's heritage. Preferred amenities included an amphitheater, restrooms, picnic areas, water features, and a basketball court. Over 96% of respondents supported securing federal funding for cleanup and redevelopment and many indicated a willingness to volunteer or donate to the project.

The proposed reuse strategy is a direct implementation of the **2025 City of Wallace Comprehensive Master Plan (CMP)**, which designates the Site's location for future Parks and Civic Spaces. The project will fulfill core CMP objectives by: **Strengthening Connectivity (Obj. 1.6)**: Creating new pedestrian links to downtown and the adjacent historic district; **Enhancing Public Spaces (Obj. 2.2)**: Transforming a brownfield into a community asset that supports livability and social gathering; **Supporting Lifelong Learning (Obj. 3.5)**: Incorporating interpretive signage about Wallace's mining history and environmental restoration; and **Improving Recreation & Preserving Character (Obj. 3.7)**: Providing accessible green space and amenities that respect the town's historic scale, scenic viewsheds, and walkable nature.

This reuse plan ensures that redevelopment aligns with the CMP and complements the City's distinction as a historic district on the National Register of Historic Places.

The reuse plan supports the **City's Historic Preservation Plan (HPP; 2020)** by enhancing public spaces adjacent to the Carnegie Library and the historic downtown. The HPP designates the Site as *non-contributing* (HPP Map 6), allowing for improvements to the Site that transform a liability into a community asset without impacting the City's historic character. The reuse plan also advances **WSD's 2023-2028 Strategic Plan** by promoting educational opportunities and lifelong learning through outdoor classrooms, interpretive signage, and spaces for youth programs and reflects WSD's commitment to safe, accessible school facilities.

The Site lies within FEMA Zone AE, a federally designated floodplain along the South Fork of the CDA River. Its flat terrain and proximity to the river make it susceptible to seasonal flooding and stormwater overflow. Redevelopment as a park is compatible with floodplain management goals, as open space reduces flood risk compared to extensive structural development. Park design will incorporate flood-resilient strategies, such as elevated amenities, permeable surfaces, and stormwater management features, ensuring compliance with federal, state, and local standards while enhancing environmental stewardship.

1.d Outcomes and Benefits of Reuse Strategy: The Site's prominent location at the gateway to the historic downtown makes it a keystone property and its cleanup and reuse can catalyze broader revitalization. The proposed reuse will transform the Site into a community park adjacent to the Jr./Sr. High School and the Carnegie Library. This highly visible location along I-90 and near the City's historic downtown positions the park as a key asset for heritage tourism, which is central to Wallace's economy. By replacing a deteriorating, contaminated structure with an attractive public space, the project will:

- **Stimulate tourism and local spending** by creating a new destination for visitors exploring Wallace's historic downtown and outdoor recreation opportunities.
- **Support local businesses through increased foot traffic and event-based activity**, such as performances in the proposed amphitheater and family-friendly gatherings.
- **Enhance property values and investor confidence by removing blight** and improving the visual appeal of a gateway corridor.
- **Create community-use space for educational programs, cultural events, and outdoor learning** aligned with the City's CMP and WSD's strategic goals.

The reuse strategy directly adds to the City's inventory of parks and civic spaces, fulfilling its CMP objectives to strengthen connectivity to historic landmarks, enhance public open spaces, and support livability and recreation.

Currently, the Site is covered by impermeable surfaces (the building and parking lot) which worsen stormwater runoff and localized flood risk. Redevelopment as a park will:

- Increase stormwater infiltration through permeable surfaces, landscaped areas, and green infrastructure.
- Reduce localized flooding near the channelized section of the South Fork CDA River, which borders the Site and lies within FEMA Zone AE (100-year floodplain).
- Incorporate **flood-resilient design features**, such as elevated amenities, native vegetation, and stormwater controls to mitigate impacts from seasonal flooding and extreme weather events.

These measures align with the CMP goals for environmental stewardship and infrastructure resilience.

While the primary reuse is a park, WSD will incorporate **energy-efficient features**, including:

- Solar-ready infrastructure for lighting and small-scale power needs (e.g., amphitheater, restrooms, etc.).
- LED lighting and energy-efficient fixtures for safety and year-round use.

These measures will reduce long-term operational costs and reinforce the City's sustainability objectives. Post-cleanup, the project will deliver economic revitalization, environmental resilience, and community enrichment. By creating a park that honors Wallace's heritage, improves stormwater management, and incorporates energy-efficient design, the reuse strategy advances local priorities and positions the City for **sustainable, community-focused growth**.

1.e Resources Needed for Site Characterization: Previous Site Phase I and II Environmental Site Assessments were completed with EPA Targeted Brownfields Assessment and DEQ BRP funding. These investigations sufficiently characterized site contamination to support development of a draft Analysis of Brownfields Cleanup Alternatives (ABCA). No additional resources are needed for site characterization;

however, WSD maintains a \$310,000 dedicated Site redevelopment fund for unanticipated costs not covered by this grant. WSD may also seek additional funding from DEQ’s BRP, if needed.

1.f Resources Needed for Site Remediation: This grant will provide the resources needed for WSD to complete the proposed cleanup. However, as mentioned previously, WSD’s Site redevelopment fund may be used for unanticipated costs not covered by this grant.

1.g Resources Needed for Site Reuse: WSD has already **secured \$310,000 in the dedicated Site redevelopment fund**. Building on this strong, local commitment, WSD and its partners have identified **\$360,000 in additional grant opportunities** (listed in the table below). Moreover, the community has a demonstrated history of supporting local projects. In 2020-2021, residents and local businesses raised more than \$1.2M to rehabilitate the City Pool, including \$250,000 in private donations. Other recent fundraising efforts include ~\$5,000 in community and business contributions for the Visitor Center dog park and ~\$20,000 in combined in-kind construction services and private donations for Pine Street Park. This record of successful fundraising provides a strong foundation for future support of the Site’s redevelopment.

Resources for Site Characterization, Remediation, and Reuse

Resource	Assessment, Remediation, or Reuse	Status	Details
WSD Civic Auditorium & Facility Project Fund	Assessment, Remediation, & Reuse	Secured	\$310,000 for assessment & cleanup not covered by this grant, reuse costs, & grant match requirements
Idaho Commerce (IC) Community Development Block Grant (CDBG)	Reuse	Unsecured	\$245,000 for infrastructure improvements, site preparation, & community recreational facilities
IC GEM Grant			\$50,000 for recreational equipment & amenities
T-Mobile Hometown Grant			\$50,000 for community gathering spaces, technology integration, & youth-focused recreational amenities
AARP Community Challenge Grant			\$15,000 for multigenerational recreational amenities, accessibility improvements, & community wellness
Community Fundraising			Business sponsorships & private donations

1.h Use of Existing Infrastructure: The Site is **well-positioned to utilize existing infrastructure**, minimizing the need and costs for extensive new installations. The Site is already served by public utilities, including water, sewer, and electrical connections, as well as paved access via River Street and Front Street/I-90 Business Route, which provide **direct connectivity to Wallace’s historic downtown and regional transportation corridors**. The adjacent parking lot, which remains in use, will be incorporated into the reuse plan. Additional dedicated parking will be added along River Street to avoid disturbances to day-to-day school operations. Proximity to the Jr./Sr. High School and the Carnegie Library ensures that the Site is integrated into a network of community facilities, **reinforcing accessibility and walkability**.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a The Community’s Need for Funding: WSD and the community it serves faces significant **economic challenges** that limit its ability to fund Site remediation and redevelopment without external assistance.

Socioeconomic Indicators	City of Wallace	Shoshone County	Idaho	United States
Median Household Income ¹	\$50,526	\$49,975	\$74,636	\$80,610
Poverty Rate ¹	20.2%	15.1%	10.6%	11.9%
Child Poverty (<18) ¹	~24%	~20%	~12%	~16%
Senior Poverty (65+) ¹	~11%	~10.7%	~8%	~9%
Food stamps in the past year ²	12.6%	13.3%	-	11.8%
Food insecurity in the past year ²	16.4%	17.1%	-	15.6%
Housing insecurity in the past year ²	13%	13.3%	-	12.9%

¹ U.S. Census Bureau, American Community Survey (ACS) 2023 5-Year Estimates.

² Centers for Disease Control and Prevention, PLACES: Local Data for Better Health; all health outcomes are age-adjusted % for adults; 2023. (State-level data is not available).

City and County median household incomes (\$50,526 and \$49,975) are far below Idaho and US averages (\$74,636 and \$80,610), and **the City’s poverty rate (20.2%) is nearly double state and national levels (10.6% and 11.9%)**. Poverty rates, food stamp usage, and food insecurity for the City and the County exceed those for the US, underscoring the community’s limited financial capacity.

WSD students have **elevated school-age poverty (20%)** compared to all students in Idaho (10%).³ At the same time, **WSD faces severe financial constraints** regarding the construction and maintenance of school facilities. Idaho ranks among the lowest states nationally for facility funding. In 2020, Idaho spent only \$1,080 per student on school buildings, less than half the national average, and \$6.82 per gross sq. ft., compared to \$12.83 nationally. State law caps maintenance funding at 2% of a building’s replacement value, far below the 7% industry standard. **Most districts rely on local bonds for major facility work.** In Idaho, a two-thirds supermajority is needed to pass a bond, which is extremely difficult for small, rural communities with limited tax bases (like Wallace) to attain⁴. In 2019, a neighboring school district’s \$7.9M facilities bond received majority support but still failed to meet the supermajority requirement.

The Site presents **significant environmental hazards**, with confirmed friable asbestos, lead-based paint, metal-contaminated structural concrete, mold, structural failures, and risk of collapse. Located near the Jr./Sr. High School and the Carnegie Library, **these conditions pose an imminent threat to the public**. Cleanup costs far exceed WSD’s financial capacity. Without federal assistance, these hazards will remain unaddressed, perpetuating blight, limiting redevelopment, and preventing safe reuse of the Site.

2.b Health or Welfare of Sensitive Populations: Sensitive populations in the TA include children, older adults, low-income residents, and individuals with chronic respiratory or other health conditions. Nearby Jr./Sr. High School students and residents are at heightened risk from lead and asbestos exposure, which can cause long-term health issues. With a poverty rate nearly double that of the state, **residents have limited access to healthcare and fewer resources to mitigate environmental risks**. Rural communities experience higher rates of chronic respiratory disease and often lack access to specialized medical care, increasing vulnerability to contaminants like asbestos and mold.

The City and County have higher proportions of young children, elderly residents (County only), veterans, and persons with disabilities compared to Idaho and the US. These populations are more susceptible to exposures from the Site’s deteriorating hazardous building materials. Water intrusion and mold exacerbate respiratory risks, while **structural decay increases the likelihood of accidental exposure** during unauthorized entry or structural failure.

Sensitive Populations ¹	City of Wallace	Shoshone County	Idaho	United States
Under age 5	8.7%	6.2%	5.5%	5.7%
65 Years and Older	15.6%	22.8%	17.8%	16.8%
Veteran Population	11.2%	9.9%	8.3%	5.9%
Persons with Disabilities	26.9%	22.6%	14%	13.7%

Site cleanup will directly address these threats by removing a concentrated source of asbestos, lead, and mold adjacent to homes, the Jr./Sr. High School, and the Carnegie Library; thus reducing cumulative exposure risks for children, seniors, and low-income households. During cleanup, measures such as dust suppression, fencing, and controlled access will protect nearby residents. Repurposing the Site as a community park will further benefit sensitive populations by improving access to safe outdoor recreation, physical activity, community gathering spaces, and healthy environments.

2.c Greater Than Normal Incidence of Disease and Adverse Health Conditions: The prevalence of **cancer, chronic obstructive pulmonary disease (COPD), heart disease, and asthma is higher in the City and the County compared to the US**. In addition, adults in both the City and the County have a higher prevalence of obesity, depression, self-reported fair/poor health, and no leisure time physical activity when compared to the US.

³ Small Area Income and Poverty Estimates 2023

⁴ Office of Performance Evaluations, Idaho State Legislature, 2022

Incidence of Adverse Health Conditions ²	City of Wallace	Shoshone County	United States
Cancer	7.2%	7.1%	6.6%
COPD	7.4%	7.8%	5.3%
Heart Disease	6.1%	6.2%	5.3%
Asthma	11.6%	11.5%	9.8%
Obesity	35.6%	35.9%	32.9%
Depression	24.4%	24.5%	20.7%
Fair or poor health	20%	20.8%	18.3%
No leisure-time physical activity	25.1%	26.1%	23.7%

The cleanup of lead and asbestos at the Site directly **addresses preventable environmental exposures for a population already experiencing greater-than-normal incidence of respiratory and chronic health conditions**, as detailed in the table above. Cleanup plus health-focused reuse as a centrally located park will help to address these cumulative health threats.

2.d Economically Impoverished/Disproportionately Impacted Populations: The City and WSD are **located within the BHSS**, an area disproportionately burdened by the environmental consequences of a century of mining and smelting operations. Historic industrial activity left **widespread contamination of soils and water with lead, arsenic, and other heavy metals**, creating long-term health and environmental risks for residents. These impacts have persisted for decades, despite ongoing cleanup efforts, and continue to affect economically vulnerable populations who lack the resources to relocate. Studies conducted in the BHSS have documented greater-than-normal incidence of lead exposure in children which is linked to neurological impairment, developmental delays, and low birth weights, particularly in children⁵.

High poverty rates among children and seniors (~24% and ~11%) further underscore the vulnerability of local residents. The City and the County have a **disproportionately high number of homes built prior to the 1980s** (94% and 77%) compared to 36% in Idaho and 48% nationally¹. Because of their age, these homes **likely contain lead-based paint** and other HBMs, disproportionately affecting low-income households.

2.e & 2.f Project Involvement and Project Roles: Key local community partners, their organizational mission, point of contact, and project roles are summarized in the table below.

Organization	Mission	Point of contact	Project Role
DEQ	Protect human health & the quality of Idaho's air, land, & water.	Eric Traynor, BRP Manager eric.traynor@deq.idaho.gov	Assist with Voluntary Cleanup Program (VCP) agreement & provide cleanup oversight.
Panhandle Health District (PHD)-BHSS Institutional Controls Program	Prevent disease, disability, premature death; to promote healthy lifestyles; & to protect the health & quality of the environment.	Mary Rehnberg mrehnberg@phd1.idaho.gov	Issue site disturbance permits, oversee disposal of metal-contaminated materials, & ensure clean barriers are in place.
Silver Valley Economic Dev. Corporation	Promote economic development in the scenic north Idaho region situated along the CDA River system.	Paige Olsen director@silvervalleyedc.com	Assist with identification & submission of redevelopment grant applications.
City of Wallace	Be a thriving destination known for its unique charm, authentic experiences, & sustainable growth.	Lynn Mogensen, Mayor lynn.mogensen@wallace.id.gov	Assist in informing the City Council of key decisions & engaging the public.
City of Wallace Planning and Zoning	Preserve Wallace's historic resources through transparent public processes that educate & engage the public, share the City's rich history, & promote community identity.	Emma Marlow, Planning and Zoning Chairperson emma.marlow@wallace.id.gov	Assist with planning & zoning requirements & ensure that reuse plans align with the City's CMP.
Shoshone County Planning and Zoning	Administer & enforce County Land Use Ordinances & Codes related to a variety of improvement and development projects.	Dan Martinsen pz@co.shoshone.id.us	Assist with planning & zoning requirements & ensure that the project plan aligns with County goals & initiatives.

⁵ EPA. (2020). BHSS Fifth Five-Year Review. U.S. Environmental Protection Agency.

The Frank A. Morbeck Community Foundation, Inc.	Benefit the quality of life in and throughout the Wallace community & surrounding area by fostering and enhancing charitable giving & philanthropic purposes.	Michael Branstetter [REDACTED]	Provide input on reuse planning.
Historic Wallace Chamber of Commerce	Preserve, promote, & protect the commercial, historic, recreational & environmental interests of Wallace, Shoshone County, & surrounding area, for the benefit of those who live, work, play & visit this beautiful area.	Kimberly Keyton, kimberly@stardustwallace.com	Assist in engaging local businesses to maximize positive outcomes for the business district.

2.g Incorporating Community Input: The WSD will incorporate public input into conceptual designs for reuse planning to **ensure that the reuse strategy reflects community priorities and advances local revitalization goals** to transform a blighted property into a vibrant public asset.

WSD will use established communication channels to keep the community informed and involved throughout the project. Updates will be shared through the district and school websites, social media, email newsletters, and flyers sent home with students. Quarterly public meetings will be held at ADA-accessible school facilities with childcare provided when feasible. Recordings and project documents will be posted online for those unable to attend. Community input will be gathered through online questionnaires, comment forms, WSD Board meetings, and interactive displays at school and community events. All feedback will be documented, reviewed by the WSD and partners, and incorporated into project decisions. Responses will be shared publicly through the website and social media.

Community outreach will include 1) **Website Updates:** WSD will regularly post fact sheets, FAQs, and public meeting summaries; 2) **Public Meetings:** WSD will host up to 4 interactive public meetings to provide updates and gather input; 3) **Board Meetings:** WSD will convene monthly board meetings to inform and engage board members and community stakeholders; 4) **Media Outreach:** WSD will share project updates via district social media, emails, and student flyers; 5) **Feedback Collection:** WSD will document input from meetings, questionnaires, and social media, ensuring community input shapes project decisions and is fully integrated into Site reuse. Summaries will be posted online. Meetings will be recorded with notes and video, while interactive activities like questionnaires will be used to capture broader input. Translation services will be provided if requested; however, based on current demographics, outreach is anticipated to be conducted primarily in English.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3.a. Proposed Cleanup Plan: The proposed cleanup plan includes the **removal of HBMs for disposal in a permitted landfill**. Because of the current state of decay and unsafe conditions, the Site building will be removed in order to remove and dispose of **metal-contaminated structural concrete, asbestos-containing roofing material, and other confirmed HBMs**. This plan eliminates exposure risks using a proven approach consistent with recognized industry and regulatory standards (e.g., NESHAP, OSHA) and is the preferred cleanup option presented in the draft ABCA. The proposed cleanup plan addresses all potential hazards, contaminant sources, and limitations to future land use and brownfields redevelopment.

3.b, 3.c, 3.d, & 3.e Description of Task/Activities & Outputs: Proposed project tasks, the anticipated schedule, task leads, and project outputs are summarized in the table below.

Task 1: Cooperative Agreement (CA) Oversight & Reporting	c. Lead: WSD w/assistance from QEP
b. Implementation. Task 1 includes: 1) competitively procure a qualified environmental professional (QEP) (pursuant to 2 CFR 200); 2) attendance of 2 staff at up to 3 Brownfields regional/national conferences; 3) quarterly progress reports (QRs) in EPA’s Assessment, Cleanup and Redevelopment Exchange System (ACRES), annual Federal Financial Reports (FFRs), ACRES updates, and final closeout report summarizing accomplishments, expenditures, outcomes, outputs, lessons learned, and resources leveraged.	
d. Anticipated schedule: It is anticipated that the CA will be issued in Q4 of 2026 and a contract will be executed with a QEP in Q1 of 2027. QRs will be submitted by the 30 th of January, April, July and October each year. Grant	

closeout report expected to be completed no later than 120 days after the end of the CA period of performance. WSD staff will attend up to 1 Brownfield training/conference per year.	
e. Outputs: a) 16 QRs; b) 4 FFRs; c) ACRES updates; d) 1 closeout report.	
Task 2: Community Outreach	c. Lead: WSD w/assistance from QEP
b. Implementation: A description of methods for involving the public is provided in 2.g. This task includes: 1) completion of a Community Involvement Plan (CIP), presentations, and outreach materials; 2) hosting up to 4 public meetings to discuss cleanup/redevelopment plans and gather input from the community; 3) presenting project updates at WSD Board meetings; 4) posting regular updates (e.g., fact sheets, FAQs, and meeting notes) to WSD’s website; and 5) developing a Site reuse plan for use in public meetings.	
d. Anticipated schedule: Up to 1 public meeting will be held per year starting in 2027. The WSD Board meetings will be held monthly. The preparation of the CIP will be completed in Q1 of 2027. Outreach materials will be developed as needed. Updates to the webpage will be completed as needed.	
e. Outputs: a) 1 CIP; b) up to 4 public meetings; c) up to 16 WSD Board updates (1 per quarter) with meeting notes posted to WSD webpage; d) up to 2 press releases; e) up to 3 factsheets.	
Task 3: Site Cleanup	c. Lead: QEP w/oversight from WSD
b. Implementation: Task 3 includes: 1) enrollment in the Idaho VCP; 2) completion of draft and final VCP workplan/ABCA; 3) development of design specifications for HBM abatement and removal; 4) Bid procurement for Site cleanup; 5) Site cleanup including notifications and permitting, HBMs abatement, removal and disposal, backfill and site grading, cleanup oversight, and clearance sampling, and 6) a draft and final cleanup completion report.	
d. Anticipated schedule: Cleanup planning will be completed by Q4 of 2027 with submission of a final VCP workplan/ABCA. Cleanup design specification will be completed by Q1 of 2028. Bid procurement and cleanup contractor selection will occur by Q2 of 2028 and Site cleanup activities will be initiated in June of 2028 or 2029 and completed by August of the same year. Submission of a final cleanup completion report no later than Q3 of 2030.	
e. Outputs: a) 1.1-acres ready for redevelopment; b) 1 draft and 1 final VCP workplan/ABCA; c) 1 cleanup bid package; and d) 1 cleanup completion report.	

3.f Cost Estimates: Total estimated costs are **\$4,000,000**. The budget narrative is provided below with a table showing salary, fringe and hourly assumptions for WSD staff. Contractual and construction costs are based on 2026 industry averages and input from local vendors, contractors and consultants.

Budget Categories	Task 1: Oversight & Reporting	Task 2: Community Outreach	Task 3: Site Cleanup	Totals
Personnel*	\$ 44,130	\$ 9,540	\$ 13,930	\$ 67,600
Fringe benefits*	\$ 9,420	\$ 2,040	\$ 2,980	\$ 14,440
Travel	\$ 9,750	\$ 0	\$ 0	\$ 9,750
Equipment	\$ 0	\$ 0	\$ 0	\$ 0
Supplies	\$ 0	\$ 0	\$ 0	\$ 0
Contractual	\$ 52,170	\$ 53,650	\$ 297,540	\$ 403,360
Construction	\$ 0	\$ 0	\$ 3,500,000	\$ 3,500,000
Other	\$ 2,100	\$ 0	\$ 2,750	\$ 4,850
Total Direct Costs	\$ 117,570	\$ 65,230	\$ 3,817,200	\$ 4,000,000
Indirect Costs**	\$ 0	\$ 0	\$ 0	\$ 0
Total Budget	\$ 117,570	\$ 65,230	\$ 3,817,200	\$ 4,000,000

*Personnel, fringe, and contractual costs are rounded to the nearest 10 dollars; WSD staff rates are provided in a table below.

**No indirect costs are included.

Task 1: CA Oversight & Reporting. Total Budget=\$117,570; Personnel/Fringe: \$44,130/\$9,420 for 1,080 hrs of project management & reporting (Superintendent [Supt.] = 216 hrs, Business Manager [Business Mgr.] = 576 hrs, Administrative Assistant [Admin. Assist.] = 288 hrs). Travel: **\$9,750** for 2 staff to attend 3 regional or National Brownfields conferences (Airfare/baggage \$500/person/conference = \$3,000; lodging [\$145/night for 5 nights/person/conference = \$4,350] & meals [\$80/day for 5 days/person/conference = \$2,400]. Other: **\$2,100** for conference fees (\$350/conference/person). Contractual: **\$52,170** for 324 hrs at

an average rate of \$161 for the QEP to assist WSD with QRs, ACRES database updates, FFRs, and final closeout reports and to conduct regular meetings with WSD staff and project stakeholders.

Task 2: Community Engagement. Total Budget=\$65,230; Personnel/Fringe: \$9,540/\$2,040 for 192 hrs for meeting coordination, planning, and attendance; CIP development; outreach material preparation; and website updates (Supt.=96 hrs, Business Mgr.=96 hrs). Contractual: **\$53,650** for 150 hrs at an average rate of \$161 for the QEP to assist with outreach. These costs assume the QEP will participate in meetings with the WSD board, project stakeholders, and the public (30 hrs); prepare meeting presentation materials (40 hrs); assist with the CIP and outreach materials (80 hrs); and complete a Site Reuse Plan (\$29,500) for use in public meetings.

Task 3: Site Cleanup. Total Budget=\$3,817,200; Personnel/Fringe: \$13,930/\$2,980 for 448 hrs for bid procurement and cleanup oversight (Supt.=32 hrs, Admin. Assist.=32 hrs, Business Mgr.=64 hrs, Facilities Director [Facilities Dir.] =320 hrs). Contractual: **\$297,540** for the QEP to complete 1 VCP Workplan/ABCA (\$9,660), 1 abatement design specifications plan (\$30,000), and 1 Construction Completion Plan (\$12,880) and to provide bid procurement support and construction oversight during cleanup (\$245,000). Construction: **\$3,500,000** includes required permitting and notifications; HBM abatement and disposal; clearance sampling; and final backfill and grading. Other: **\$2,750** for State VCP enrollment and oversight fees.

The building’s condition presents significant technical challenges that substantially increase cleanup complexity and cost. A recent structural evaluation identified a severe risk of collapse, requiring engineered structural removal methods to safely conduct abatement and removal. The structure contains an unusually large volume of ACM (75,000 sq. ft.) and much of the structural concrete is contaminated with heavy metals, necessitating specialized handling and disposal. The Site’s remote location further increases transportation and disposal costs. These combined factors require a highly specialized abatement and removal approach that exceeds the scope and cost of a typical HBM abatement project.

WSD Staff	Salary	Fringe	Task 1 Hours	Task 2 Hours	Task 3 Hours
Supt.	\$59.15	\$12.62	216 hrs (4.5hrs/mo. for 4yrs)	96 hrs (6hrs/wk for 16wks)	32 hrs (2hrs/wk for 16wks)
Business Mgr.	\$40.22	\$8.58	576 hrs (12hrs/mo. for 4yrs)	96 hrs (6hrs/wk for 16wks)	64 hrs (4hrs/wk for 16wks)
Admin. Assist.	\$28.42	\$6.06	288 hrs (6hrs/mo. for 4yrs)	NA	32 hrs (2hrs/wk for 16wks)
Facilities Dir.	\$26.71	\$5.70	NA	NA	320 hrs (20hrs/wk for 16wks)

3.g Plan to Measure and Evaluate Environmental Progress and Results: WSD will measure and evaluate progress on a quarterly basis and summarize outputs and outcomes achieved in an Excel spreadsheet in the quarterly reports. We will incorporate outputs and outcomes in the CA workplan and track completion. Monthly budget reviews will evaluate remaining tasks, outputs, and schedule. The status and estimated completion dates for outputs will be tracked by WSD and reported to EPA during regular calls with the Region 10 Project Manager and through QRs and ACRES updates. WSD will ensure that proposed grant activities are progressing as planned and completed on schedule.

The outcomes will also be tracked and reported to EPA in a final report. WSD will track and evaluate the following outcomes: 1) # of acres of land cleaned up and ready for reuse; 2) total amount and type of leveraged funds used for redevelopment; and 3) # of acres of greenspace developed.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4.a Organizational Structure, 4.b Description of Key Staff, and 4.c Acquiring Additional Resources:

The WSD serves ~500 students across 5 communities and operates under a well-defined organizational structure that ensures strong oversight of technical, administrative, and financial grant requirements. An elected Board of Education sets policy and ensures accountability and the WSD Superintendent oversees daily operations and coordinates cross-departmental efforts. Key departments include Facilities Maintenance, which is responsible for district-wide safety and security, facility management, and health and safety compliance and Accounting, which manages accounts receivable/payable, payroll, and tracking of grant expenditures and budgets.

The project team is comprised of staff with expertise in implementing similar large federal and state grants that include bid procurement, facilities maintenance, construction management, and community

engagement. **Superintendent Todd Howard** brings 12+ years' experience with WSD managing school and district budgets up to \$7.5M and overseeing facilities and safety initiatives. **Bea Conley, Business Manager**, has 10+ years' experience with WSD in accounting, budgeting, auditing, and procurement compliance. **Connie Leetch and Marcia Howard, Administrative Assistants**, have 28+ years' experience combined at WSD in fund accounting, purchasing support, and accounts receivable and payable. **Art Tiffin, Facilities Director**, brings 20+ years of operational and safety expertise from his work with WSD and his career as a Navy safety technician. Together, this team provides the knowledge and capacity for the successful and timely expenditure of grant funds. WSD also maintains additional administrative and operational staff to ensure continuity if key staff become unavailable.

WSD will competitively procure a QEP upon notice of award. WSD has established procurement policies and procedures for acquiring additional resources that are compliant with applicable federal, State and local laws and regulations. WSD has procured services as defined in district policy for the following similar projects: Silver Hills Elementary: ~\$110,000 HBM abatement and flooring replacement (2025-2026); Wallace Jr./Sr. High School: \$38,000 gym floor repair (2025); Silver Hills Elementary: \$233,000 boiler upgrade (2024-2025) & \$675,000 restroom renovation (2023-2024); and Wallace Jr./Sr. High School Construction: \$6.5M (2002-2003).

WSD employs internal audits, detailed financial reporting, and project management software for scheduling and milestone tracking. These systems, combined with established policies and experienced personnel, ensure WSD will meet all technical, administrative, and financial grant obligations.

4.d Currently Has or Previously Received an EPA Brownfields Grant: Not applicable.

4.e Has Not Received an EPA Brownfields Grant but Has Received Other Federal or Non-Federal Financial Assistance Agreements; *4.e.1. Purpose and Accomplishments*: Although WSD has not received an EPA Brownfields grant, it has received and successfully managed many other state and federal grants. Key staff, Superintendent Howard and Business Manager Conley, managed the following recent grants: **US Dept. of Education Elementary and Secondary School Emergency Relief Grant (\$1,165,000 awarded from 2021-2024)**. This K-12 schools grant addressed the impact of the COVID-19 pandemic on students, educators, and school operations. WSD's grant expenditures were all in compliance with grant requirements. WSD students attended school in-person for the duration of the grant, showed limited regression due to lost instructional time, and continued to show measurable growth in all academic areas. **Two consecutive Idaho Department of Education (ISDE) Consolidated Federal and State Grants for 2024-2025 (\$267,000 awarded in 11/2024) and for 2025-2026 (\$272,000 awarded in 10/2025)**. These State School Program Improvement Grants support improvements to reading and math instruction and proficiency and staff development. The WSD has complied with all grant requirements and student proficiency for math and reading were ranked in the top 10 of small, rural Idaho school districts. Proficiency rates continue to be at or above state averages. Staff professional growth and development plans have been completed as outlined in the grant application. **An ISDE Idaho Career Ready Students Grant (\$26,610 awarded in 12/2025)**. This grant supports the expansion and improvement of WSD's Career Technical Programs. WSD purchased equipment for the Wallace Jr./Sr. High School Career Technical Program in compliance with all grant requirements. *4.e.2 Compliance with Grant Requirements*: WSD has met all the requirements of the grants listed above. WSD staff closely monitors progress toward program goals, milestones and intended outputs and outcomes and conducts annual third-party audits. No adverse audit findings have been determined. All terms and conditions of the awarding agencies were met in a timely manner and in accordance with set workplans and schedules. Reports and financials were submitted in a timely manner and applicable grants were closed as detailed above.

4.f Never Received Any Type of Federal or Non-Federal Assistance Agreements: Not applicable.

Wallace School District (WSD) #393 Brownfield Cleanup Grant Application

Threshold Criteria

1. Applicant Eligibility

- a) The Wallace School District (WSD) #393 affirms that it is eligible for an EPA Cleanup Grant as a general purpose unit of local government (a public school district) as defined by 2 CFR § 200.1. See Attachment A for documentation of WSD's status.
- b) WSD #393 is a unit of local government, therefore section 501(c)(4) of the Internal Revenue Code does not apply.

2. Previously Awarded Cleanup Grants

WSD #393 affirms that the proposed site has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds

WSD #393 affirms that it does not have an open EPA Brownfields Multipurpose Grant.

4. Site Ownership

WSD #393 is the sole owner of the site. The City of Wallace transferred the site to WSD #393 through city ordinance on January 25, 1957.

5. Basic Site Information

- a) Name of the site: Wallace Civic Auditorium
- b) Address: 415 River Street, Wallace, ID 83873

6. Status and History of Contamination at the Site

- a) The Wallace Civic Auditorium site is contaminated by hazardous substances. Contaminants of concern at the site include asbestos, lead-based paint, structural concrete with high metals concentrations, mercury-containing fixtures, and mold.
- b) Historical records show that the site was used as a public space and for recreational purposes by the early 1900s. Records dating back to 1901 indicate that the property was utilized as baseball grounds and a city park prior to construction of the Civic Auditorium Building in 1946 and attached academic wings in 1959, which housed a cafeteria, shop spaces, and classrooms. The site served as a high school/civic auditorium until 2003 when the new Wallace Junior/Senior High School was built. From 2003 to 2014, the site operated as a civic center and it was permanently closed in 2021 due to health and safety concerns. Currently, the majority of the site is occupied by a ~24,000 sq. ft., 2 story masonry building (the Civic Auditorium building and attached academic wing). The rest of the site is a parking lot for the adjacent Junior/Senior High School. Today, the site building is vacant and in extremely poor condition. The decaying condition of the site building contrasts sharply with the neighboring Wallace Carnegie Library (built in 1911) and the City's well preserved historic district.

- c) A 2025 Hazardous Building Materials (HBM) survey identified friable asbestos, lead-based paint, mold, mercury-containing fixtures, and metal-contaminated structural concrete throughout the building. These environmental hazards are compounded by significant structural risks. A 2026 Structural Condition Assessment (SCA) found that the building's 1940 bowstring trusses have failed, creating a severe risk of collapse and making asbestos containing roofing and gypsum board extremely dangerous to remove. The SCA also indicates that stabilizing metal-contaminated concrete in place would be costly and require substantial repair, and that HBM abatement without removing the entire building may not fully resolve the building's environmental and structural hazards.
- d) The types of hazardous building materials found at the site were commonly used in construction prior to the regulation of these materials. The facility was actively used and maintained until the early 2020s. WSD #393 has facilitated community engagement efforts since 2022 to identify potential abatement and reuse of the site; however, lack of funding has prevented progress. Since that time, the condition of the building components has degraded due to lack of funding for maintenance and subsequent water intrusion, increasing the chance of their release into the building interior and potential exposure of future users or workers to these materials.

The 2025 hazardous building materials survey identified approximately 75,000 square feet of friable and non-friable asbestos-containing materials (ACMs) (containing greater than 1% asbestos) in floor mastic, vinyl sheet floor, vinyl floor tiles, gypsum ceiling board, and exterior paint in the site building. Chalkboards and associated mastic, pipe insulation, mudded hard fittings, boiler insulation, and built-up roofing were presumed to be ACMs based on visual inspection. Friable asbestos was identified as *damaged to significantly damaged* in various materials throughout the buildings.

Lead-Containing Paint (between 500 and 4,999 parts per million [ppm]) was identified in painted surfaces on walls, floors, banisters, and stairs and lead-based paint (equal to or greater than 5,000 ppm) was found on interior and exterior walls. Of the 38 representative paint samples collected, 21 were found to contain lead. Peeling and flaking paint was observed throughout site structures, with accumulations of paint chips noted in various areas of the building.

Barium and lead were detected in structural concrete at concentrations ranging from 49 ppm to 100 ppm and 82 ppm to 7,200 ppm, respectively.

Fluorescent tubes are present throughout the site structures. All fluorescent light tubes/bulbs are presumed to contain mercury.

7. Brownfield Site Definition

WSD #393 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:

- a) is NOT a facility listed or proposed for listing on the National Priorities List;
- b) is NOT a facility 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) is NOT a facility subject to the jurisdiction, custody, or control of the U.S. government.

8. Environmental Assessment Required for Cleanup Applications

The following site assessment reports have been completed for the Site:

- Phase I Environmental Site Assessment (ESA): Completed by Tetra Tech, Inc. on March 28, 2024.
- Phase II ESA and Hazardous Building Materials Survey: Completed by Eastern Research Group, Inc. on May 2, 2025, as part of the EPA Region 10 Targeted Brownfields Assessment Program. Phase II ESA activities included soil vapor sampling in exterior and interior locations to assess potential vapor intrusion from historic off-site petroleum releases and a Hazardous Building Materials Survey to quantify asbestos, lead, polychlorinated biphenyls (PCBs), mercury, Resource Conservation and Recovery Act (RCRA) 8 metals, and mold in building materials within the site structures.
- Analysis of Brownfields Cleanup Alternatives (ABCA): Completed by Eastern Research Group, Inc. on May 2, 2025, as part of the EPA Region 10 Targeted Brownfields Assessment Program.
- Structural Condition Assessment: Conducted by DCI Engineers in January 2026.
- Draft ABCA: Completed by Alta Science and Engineering, Inc. in January 2026 to incorporate the structural condition assessment and updated hazardous building material abatement cost estimates.

9. Site Characterization

- a) Not applicable.
- b) See Attachment B from the Idaho Department of Environmental Quality (DEQ), Brownfields Response Program, affirming that WSD #393 will request State oversight through enrollment in State of Idaho Voluntary Cleanup Program (VCP), that the site is eligible for enrollment in the VCP, and that the site has had sufficient site characterization for remediation work to begin.
- c) Not applicable.

10. Enforcement or Other Actions

WSD #393 affirms that there are no known ongoing or anticipated environmental enforcement or other actions related to the site for which Brownfields Grant funding is sought.

11. Sites Requiring a Property-Specific Determination

WSD #393 affirms that the site does not need a Property-Specific Determination to be eligible for EPA Brownfield Grant funding.

12. Threshold Criteria Related to CERCLA/Petroleum Liability

a) Property Ownership Eligibility - Hazardous Substance Sites

i) Exemptions to CERCLA Liability

1) Indian Tribes

Not Applicable

2) Alaska Native Village Corporations and Alaska Native Regional Corporations

Not Applicable

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

Not Applicable

ii) Exceptions to Meeting the Requirement for Asserting an Affirmative Defense to CERCLA Liability

1) Publicly Owned Brownfield Sites Acquired Prior to January 11, 2002

- a) WSD #393 acquired the property when it was transferred from the City of Wallace to the school district through city ordinance.
- b) WSD #393 acquired the property on January 25, 1957.
- c) WSD #393 affirms that no disposal of hazardous substances has occurred at the site since it was acquired by the school district.
- d) WSD #393 affirms that it has not caused or contributed to any release of hazardous substances at the site.
- e) WSD #393 affirms that it has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

iii) Landowner Protections from CERCLA Liability

1) Bona Fide Prospective Purchaser Liability Protection

Not Applicable

2) Non-Publicly Owned Sites Acquired Prior to January 11, 2002

Not Applicable

iv) **Sites with hazardous building material that is not released into the environment**

WSD #393 affirms that there have been no release or threats of release of hazardous substances from building materials to the outdoor environment.

b) **Property Ownership Eligibility - Petroleum Sites**
Not Applicable

13. Cleanup Authority and Oversight Structure

a) **Cleanup Oversight**

WSD #393 is currently working closely with DEQ's Brownfield Program and plans to enter the State of Idaho VCP. WSD #393 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 and will incorporate technical assistance from a qualified environmental professional (QEP) specializing in brownfield cleanup as well as an AHERA-certified asbestos abatement contractor through a formal competitive bid process. WSD #393's procurement policies are in full compliance with all applicable Federal, State and local laws and adhere to the competitive procurement standards in 2 CFR 200.

b) **Access to Adjacent Properties**

WSD #393 does not anticipate the need to access neighboring properties to conduct the cleanup, perform confirmation sampling, or monitor offsite migration of contamination. Remedial actions will be performed within site property boundaries.

14. Community Notification

WSD #393 provided the community with notice of its intent to apply for an EPA Brownfield Cleanup Grant and allowed the community an opportunity to comment on the draft grant application package, including the draft ABCA. Details are provided below.

a) **Draft Analysis of Brownfields Cleanup Alternatives**

A draft ABCA for the Site was made available on January 9, 2026, on the WSD #393 website and in print at the WSD #393 office for public review and comment. The draft ABCA summarizes information about:

- The site and contamination issues, cleanup standards, and applicable laws;
- The cleanup alternatives considered; and
- The proposed cleanup.

b) **Community Notification Ad**

A community notification ad requesting public input was published on January 6, 2026, in the local newspaper and through the WSD #393's social media platform. A copy of

this grant application, including the draft ABCA, was made available for public review and comment online on WSD #393's website and in print at the WSD #393 office on January 9, 2026.

c) Public Meeting

A presentation about this grant application was made during a regularly scheduled in person WSD #393 Board of Trustees meeting on January 12, 2026, at 6:00 p.m. Information was provided in the newspaper ad and social media postings regarding how to request accommodations for persons with disabilities or limited English proficiency. WSD #393 Board of Education members and staff were present to address questions or comments made during the meeting. WSD #393 staff documented participant attendance and maintained meeting minutes.

d) Submission of Community Notification Documents

The following community notification documents are included as Attachment C to this application:

- A copy of the draft ABCA;
- A copy of the newspaper ad, a screenshot of the social media posting, and a dated screenshot of the WSD #393 website with the draft ABCA and grant application postings, demonstrating a) notification to the public and solicitation for comments on the application and b) that notification to the public occurred at least 14 calendar days before the application was submitted to EPA;
- Meeting notes from the public meeting, which includes a summary of comments received and WSD #393's responses to those comments and the meeting sign-in sheets/participant list.

15. Contractors and Named Subrecipients

Contractors

Not Applicable; The school district has not identified or procured contractors specific to this project.

Named Subrecipients

Not Applicable



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, ID 83706 • (208) 373-0502
www.deq.idaho.gov

Brad Little, Governor
Jess Byrne, Director

January 9, 2026

Todd Howard
Wallace School District
1 Miners Alley
Wallace, Idaho 83873

Re: Wallace School District Clean Up Grant Application for the former Wallace Civic Auditorium

To Whom it May Concern:

The Wallace School District is applying for a cleanup grant for the former Wallace Civic Auditorium located at 415 River Street in Wallace, Idaho. A Targeted Brownfields Assessment was conducted in February 2025. The Hazardous Building Survey found asbestos-containing building materials, lead containing and lead based paint, metals, mercury containing fluorescent bulbs, and mold within the Civic Auditorium and East Academic Wing. Based on these findings the development of an Analysis of Brownfields Cleanup Alternatives was developed to address the hazardous building materials in the Civic Auditorium and the East Academic Wing.

The former Wallace Civic Auditorium is an eligible site for the Idaho Department of Environmental Quality's (IDEQ) Voluntary Response Program and has participated in the IDEQ's Brownfields Program. The Wallace School District has indicated its intention to join the IDEQ Voluntary Response Program should the grant application be successful. The Targeted Brownfields Assessment that was completed in February 2025 was deemed to be adequate by the EPA contractor and no data gaps were identified in the final report.

Thank you for your consideration of the cleanup grant application submitted by the Wallace School District.

Regards,

A handwritten signature in blue ink, appearing to read "Eric Traynor", is written over a horizontal line.

Eric Traynor
Idaho Brownfields Program Coordinator
Idaho Department of Environmental Quality
Email: eric.traynor@deq.idaho.gov