2025 Annual Accomplishment Report

Star Complex. Images provided by CDA Trust.

Basin Environmental Improvement Project Commission

March 2026

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To obtain a copy of this report or other information visit www.basincommission.com
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Tamarack in Canyon Creek. Images provided by CDA Trust.

Executive Summary

The Basin Environmental Improvement Project Commission (BEIPC) is responsible for coordinating environmental remediation to address heavy metal contamination, natural resource restoration and water quality in the Coeur d'Alene Basin (Basin). The BEIPC also participates in guiding and coordinating infrastructure upgrades and improvements to protect the environmental cleanup remedy and enhance living conditions in the communities of the Basin. The Basin is defined as the watersheds of the Coeur d'Alene River (CDA River), Coeur d'Alene Lake and the Spokane River within the Idaho Counties of Shoshone, Kootenai, and Benewah, as well as the Coeur d'Alene Tribal Reservation within Idaho.

In 2025, the BEIPC coordinated and monitored the efforts of various entities in environmental remediation and natural resource restoration, as outlined in the BEIPC 2025 Annual Work Plan and five-year operating plan. During this period, the 2025 Annual Work Plan and an updated five-year plan were also developed. The environmental remediation work was performed through the federal Comprehensive, Environmental Response, Compensation and Liability Act (CERCLA) Program, the State of Idaho environmental cleanup programs, and actions under the direction of the Environmental Protection Agency (EPA) by the Coeur d'Alene Work Trust (Trust) formed under the ASARCO Bankruptcy settlement. Natural resource damage restoration work was performed by the Coeur d'Alene Basin Natural Resource Trustees (Restoration Partnership) which includes the Coeur d'Alene Tribe (CDA Tribe), State of Idaho Department of Environmental Quality (DEQ), Idaho Department of Fish and Game (IDFG), U.S. Fish and Wildlife Service (USFWS), Bureau of Land Management (BLM) and the U.S. Forest Service (USFS). The Panhandle Health District (PHD) continued to manage the Institutional Controls Program (ICP) to control the release and migration of contamination remaining in place after remediation.

BEIPC Overview

The Basin Environmental Improvement Project Commission (BEIPC) was established by the Idaho State Legislature pursuant to state law and implemented through a Memorandum of Agreement (MOA) among the signatory parties. The BEIPC is authorized to coordinate with the U.S. Environmental Protection Agency (EPA) and the Idaho Department of Environmental Quality (DEQ) in the implementation of the Interim Record of Decision (ROD) for Operable Unit 3 (OU-3) of the Bunker Hill Mining and Metallurgical Complex Superfund Site. The BEIPC is also authorized to support implementation of the Interim Upper Basin Record of Decision Amendment (RODA) for portions of OU-3 and Operable Unit 2 (OU-2) to advance remediation of heavy metal contamination in the Upper Basin, defined as the area extending from the confluence of the North and South Forks of the Coeur d'Alene River upstream to the headwaters of the South Fork above Mullan.

The Coeur d'Alene Basin constitutes Operable Unit 3 of the Bunker Hill Mining and Metallurgical Complex Superfund Site, which was listed on the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) National Priorities List in 1983. Operable Units 1 and 2 consist of populated, industrial, and undeveloped lands within an approximately 21-square-mile area encompassing the communities of Pinehurst, Smelterville, Wardner, and Kellogg, together with adjacent lands in Shoshone County commonly referred to as the "Bunker Hill Box." Operable Unit 3 includes all remaining areas of the Basin outside the Box where mining-related contaminants have migrated and been deposited.

In accordance with its statutory authority and the MOA, the BEIPC is further authorized to:

- Assist the EPA in the development, coordination, and implementation of the Superfund Cleanup Implementation Plan (SCIP), which provides an integrated framework for cleanup activities in the Upper and Lower Basins consistent with remedies selected in the OU-3 ROD and Upper Basin RODA;
- Participate in planning and coordination related to management of Coeur d'Alene Lake;
- Coordinate and support remediation of heavy metal contamination at mining sites in the North Fork of the Coeur d'Alene River;
- Assist the Coeur d'Alene Basin Natural Resource Trustees in implementation of the Basin Restoration Plan; and
- Facilitate multi-agency coordination to address flood risk and related environmental concerns in the South Fork Coeur d'Alene River and Pine Creek drainages.

State legislation and the MOA establishing the BEIPC authorize the appointment of a seven-member Commission consisting of:

- Four members from the State of Idaho, including one representative of the State of Idaho and one representative from each of the county commissions of Shoshone, Kootenai, and Benewah counties, all appointed by the Governor of Idaho;
- One representative of the State of Washington appointed by the Governor of Washington;
- One representative appointed by the Council of the Coeur d'Alene Tribe; and
- One federal representative of the United States appointed by the President.

Sharon Bosley is the Executive Director for the Basin Environmental Improvement Project Commission. The Executive Director supports the Board in implementing work plans and environmental activities.

BEIPC Board of Commissioners

Name	Title	Representing
Leslie Duncan Chair	Kootenai County Commissioner	Kootenai County
Brook Beeler Vice Chair	Regional Director, Washington Department of Ecology	State of Washington
Jess Byrne Secretary/Treasurer	Director, Idaho Department of Environmental Quality	State of Idaho
Emma Pokon	Regional Administrator EPA, Region 10	Federal Government
Dave Dose	Shoshone County Commissioner	Shoshone County
Caj Matheson	Coeur d'Alene Tribal Council Member	Coeur d'Alene Tribe
Mark Reynolds	Benewah County Commissioner	Benewah County

Program Management

The BEIPC operates in accordance with the Idaho statute and the MOA among the governing entities. It is responsible for coordinating the activities of federal, tribal, state and local government agencies implementing the ROD for OU-3 and the Upper Basin RODA for human health and ecological remediation activities. It is also involved in the efforts by the Restoration Partnership to restore natural resources in accordance with their CDA Basin Restoration Plan. Working through the implementation and management of Institutional Controls in the Box and Basin (ICP), the BEIPC coordinates efforts to protect the cleanup remedies, human health, and the environment from the release and migration of contaminants.

The Executive Director (ED) works with the seven governmental entities and their agencies to establish annual work plans, manages the activities and programs of the BEIPC, works to expand community involvement in the Basin work and assists governments and partners on various projects at their request. To assist the ED in program management, planning, and implementation, the states of Idaho and Washington, the EPA, the Coeur d'Alene Tribe and the Counties have provided volunteer staff "on loan" to coordinate with the ED and provide routine intergovernmental input on technical and policy issues. Other support groups include the Technical Leadership Group (TLG) and the Citizen Coordinating Council (CCC).

Technical Leadership Group (TLG)

The TLG is the BEIPC primary technical advisory group. It is comprised of federal, state, local and tribal representatives as well as interested private citizens serving on the Project Focus Teams (PFTs) who provide expertise in science, engineering, logistics, regulatory aspects, and land management in the Basin. The TLG advises the BEIPC on work planning and implementation while striving toward consensus-based recommendations. In 2025, the ED and TLG developed the 2026-2030 Five-Year and 2025 draft work plans to implement the remedy in OU-2 and 3.

In addition to providing technical assistance, practical knowledge, and to assure projects are coordinated with BEIPC activities, the TLG members schedule meetings to provide a forum for discussions on individual project effects, discuss opportunities to minimize impacts to affected stakeholders and exchange information.

Citizen Coordinating Council (CCC)

The Citizen Coordinating Council (CCC) was established to serve as the primary mechanism for public participation and input into the activities of the Basin Environmental Improvement Project Commission (BEIPC). The CCC is composed of geographically and politically diverse members and is charged with providing local citizen review and input on Basin-related environmental remediation and restoration activities. During 2025, the CCC facilitated communication with its members and the public, as appropriate, through electronic mail, postings on the BEIPC website, and the EPA platforms, and transmitted information regarding ongoing and planned activities within the Basin.

In addition to receiving various reports for review and comments, CCC members were involved in the following BEIPC activities in 2025:

May 21, 2025
The CCC sponsored an in-person/virtual meeting in Coeur d'Alene in collaboration with EPA, DEQ and the CDA Tribe. Topics included an overview of the Recreation Sites Program and how to recreate safely in the Bunker Hill Superfund Site. CCC elections were held as Jerry Boyd retired. Greg Sletten was elected as the new Chair and will hold a two-year term. Summary meeting notes can be located on the BEIPC website at www.basincommission.com.

Future CCC meetings will be scheduled to discuss specific issues needing community input. CCC members will remain informed of activities through the extensive mailing list maintained at the BEIPC office.

Public Outreach and Citizen Involvement

BEIPC Community Involvement Activities

In 2025, the BEIPC actively engaged in community outreach and education initiatives. To enhance public awareness of contamination issues, promote health protection strategies, and keep the community informed about ongoing and future cleanup projects, the BEIPC continued to provide articles for *The Dirt*, a collaborative effort focused on these critical topics. Additionally, the BEIPC participated in the *Confluence Project*, a yearlong program that connects scientific experts with high schools across North Idaho. Through classroom instruction and multiple field excursions, teachers guided students in researching water resource issues and analyzing local water data.

TCP Snow science field trip. Photo courtesy of BEIPC.

All BEIPC meetings were held in person with a virtual option, ensuring accessibility for participants. The BEIPC also maintained an up-to-date Basin website (*www.basincommission.com*), where meeting information was posted and announced at the BEIPC office in Kellogg, Idaho. Furthering its commitment to public education, the BEIPC took part in outreach efforts, including a joint information booth at the North Idaho Fair, staffed by representatives from various government agencies involved in the Basin.

In addition, the various governmental entities represented by the BEIPC continue to support the TLG and CCC by being involved in the activities of those groups. Their involvement includes meeting with citizen groups, giving technical presentations, participating in Basin events, holding tours of Basin project areas, updating information throughout the Basin, and publishing various documents to provide updates on Basin activities.

As part of the public outreach program, the Basin Commission continued to make numerous presentations to local business and community groups concerning activities of the BEIPC which include planned cleanup actions and activities required to protect the remedy, human health, and the environment. The following is a partial list of BEIPC community involvement activities throughout the year:

- Operated the booth on several occasions at the North Idaho Fair.
- Attended the Idaho Four Counties Natural Resource Committee meetings to update them on cleanup actions and discuss other topics of concern.
- Participated in The Confluence Project working with close to 300 high school students in a yearlong program educating them on their local watershed through on-site studies and classroom work.
- Participated in the Our Gem Collaborative working to preserve lake health and protect water quality by promoting community awareness of local water resources through education, outreach and stewardship.
- Organized and provided content for The Dirt Collaborative which provides informative articles focused on all aspects of cleanup efforts associated with the Bunker Hill Superfund Site. The Dirt is a group of committed and local experts from multiple agencies including the Basin Environmental Improvement Project Commission, Panhandle Health District, Shoshone County, Silver Valley Economic Development Corporation, and the Idaho Department of Environmental Quality.
- Regularly attended the Coeur d'Alene Chamber Natural Resource Committee. The ED was elected the board secretary for the committee in 2025.
- Created a BEIPC newsletter to help inform the public on upcoming meetings, recent Our Gem and Dirt articles as well as any other information pertaining to the Bunker Hill Superfund Site.
- Posted BEIPC and CCC meeting dates and agendas to the BEIPC website, social media and informational flyers with assistance from EPA and DEQ.
- Shared reports and activities updates, meeting notices, and work plans to TLG and CCC members by email for review and comment.
- Shared BEIPC related information with the EPAs Community Involvement Coordinators (CICs), DEQ and the Lake Management Plan (LMP) staff for publication on their outlets.
- Continued to update the BEIPC website. The website provides information to keep the public informed including how to become involved and participate in the process; and opportunities for the community to provide input. Updates, including agendas and summary minutes of quarterly meetings, are posted to the website at www.basincommission.com.

EPA Community Involvement Activities

EPA Region 10 prioritizes coordinating with local communities and residents. The cleanup team wants to give people meaningful opportunities to be involved in and informed about the cleanup. EPA's many community involvement activities are done in partnership with others, including the Idaho Department of Environmental Quality, the Basin Environmental Improvement Project Commission, and Panhandle Health District. We are glad to report that 2025 was another productive year of community involvement accomplishments in the Basin. Highlights include:

- EPA continued to follow its Community Involvement Plan for the cleanup: https://semspub.epa.gov/src/document/10/100137919. The plan describes how community members can get information and be involved in the cleanup and summarizes local concerns. It also outlines how EPA collaborates with its partners. Many local people helped develop this plan.
- EPA continued to partner with the CDA Trust, DEQ and PHD to increase public health messaging and education related to limiting exposures to heavy metals. New health signs continue to be posted around areas commonly used for recreation. About 72 signs have been placed to date.
- EPA developed several outreach materials to announce the location of the new Lower Basin waste consolidation area at the August 2025 Basin Commission meeting, including a communication strategy, a news release, a fact sheet and a web update.
- The agency, in coordination with its partners, conducted outreach on several projects this year, distributing flyers locally: Pinehurst Elementary School Playground Surface Barrier Replacement Project, Kellogg Sidewalk Barriers Enhancement Project, Hecla Star Complex and Tamarack No. 7, and Central Impoundment Area Sludge Pond. Outreach was also conducted for lead health education, soil testing and property cleanups, recreation and health, repositories, and more. EPA also produced a handout for participants on the BEIPC August 2025 cleanup tour, and a fact sheet to inform the public about the annual study to monitor swan health, conducted in the Lower CDA River Basin in March 2025.
- EPA Community Involvement Coordinators helped staff our partners' North Idaho Fair exhibit in August 2025, engaging with the public to respond to questions, and handing out materials about the site.
- EPA updated its key lead health awareness and education brochure, Healthy Living in the Silver Valley and Coeur d'Alene Basin, in July 2025. This brochure is featured as a handout at local public outreach events, offering tips on preventing lead exposures.

In addition to the above, EPA continued the following activities in 2025:

- Published the Basin Bulletin newsletter in March, July, and December. The Basin Bulletin provides news and updates about the Coeur d'Alene Basin Cleanup.
- Provided staff support and regular participation at meetings of the BEIPC, CCC, and TLG in keeping with EPA's commitment to the BEIPC process. In 2025, BEIPC quarterly meetings were held both in-person and virtually.

- EPA continued to maintain the website for the Basin Cleanup. It offers public access to updates, site documents, and background information. Suggestions for improvements are always welcome. (Website URL: www.epa.gov/superfund/bunker-hill).
- EPA continued to promote DEQ's webpage: https://cdabasin.idaho.gov.
- EPA maintained document collections related to the cleanup at several area libraries for public access: Wallace Public Library, Spokane Public Library, St. Maries Library, and Kellogg Public Library.
- Project managers met as requested with local officials, interest groups, and others to provide updates and answer questions in 2025.
- EPA continued to work with the media in 2025, arranging press availability sessions as needed, fielding questions from reporters about the site, running newspaper display ads, and issuing press releases on high-interest activities.

DEQ and Panhandle Health District (PHD) Community Involvement Activities

DEQ and PHD conduct education, public engagement, and health awareness activities related to the CDA Basin cleanup. Kellogg PHD is the primary partner for health messaging and outreach through the Lead Health Intervention Program. The aim is to raise awareness about lead intervention and to support the continuation of healthy trends for children, families, and visitors to the area.

The following are highlights of 2025 activities:

- ICP Contractor Licensing Course was provided at North Idaho College's Annual Safety Fest.
- Guest lecture given at Gonzaga's School of Nursing.
- Hosted booth at the North Idaho Green Summit event.
- Presented to the International Right of Way Association.
- Presented to the Kootenai Utility Council.
- Brochures and other educational materials were provided to local laundromats and other public locations.
- Presented to North Idaho Fly-Casters Association.
- Members attended Idaho's Lead Advisory Committee meetings, providing updates on Lead Health Intervention Program (LHIP) events and outreach activities and to discuss statewide activities.
- Presentations were provided to new Kootenai Health Resident Doctors.
- A booth was provided for City of Coeur d'Alene's Earth Day event.
- Presentations provided to several area real estate groups on site history, property disclosures, and legal requirements.
- Hosted a booth at the Rose Lake Flea Market.
- Taught lead science lessons to Wallace High School's environmental science class.
- Presentation provided to the Coeur d'Alene Nordic Club on safe recreation practices.
- Members collaborated with HUD and Idaho Housing and Finance Association (IHFA) to discuss HUD housing in the BHSS and provide lead awareness training.

- Historic Silver Valley Chamber of Commerce meetings were attended to give updates on 2025 remedial activities, site projects, and outreach activities.
- Historic Wallace Chamber of Commerce meetings were attended to give updates on 2025 remedial activities, site projects, and outreach activities.
- Silver Valley Economic Development Council meetings and member events were attended to give updates on 2025 remedial activities, site projects and outreach activities.
- Shoshone Medical Center Foundation board meetings and member events were attended to give updates on 2025 remedial activities, site projects and outreach activities.
- Monthly meetings were held with the Childhood Lead Poisoning Prevention Program and the Pediatric Environmental Health Specialty Unit to work on elevated blood lead cases, keep current on lead education, and coordinate efforts.
- Lead exposure education and educational giveaways were provided to attendees of the Coeur d'Alene Home and Garden Show by outreach staff. Staff worked alongside Idaho Health and Welfare staff to provide soil testing for lead, and information on radon exposure in our area.
- Outreach staff attended the Silver Valley Career/Transition Fair to educate students about careers opportunities related to work within the BHSS.
- Outreach staff gave presentations to Shoshone Benewah One-Call and the National Utilities Contractors Association regarding the need for licensure when working within the BHSS. An informational booth was provided during contractor training at Dozer Days with similar information.
- Lead health education was provided to pre-school through third grade classes at eight local schools and two daycares, distributing educational giveaway bags to all students.
- The Annual Blood Lead Screening Event (6-day event) was held using an "Under the Sea" theme. During the event a total of 231 children six months through six years of age and 121 individuals age seven and older were tested, bringing the total number of individuals screened to 352 for the event. 21 additional individuals were tested outside of the annual screening event.
- A booth was provided at the North Idaho State Fair (10-day event) to educate attendees on the BHSS, lead exposure risks, and Leading Idaho Projects reducing phosphorous loading to area waterways.
- Hosted a booth at the children's event Bubble Palooza and provided educational information and free giveaways.
- Presentations were given at Basin Environmental Improvement Project Commission Meetings upon request.
- Pizza parties were hosted for residents at the Pinehurst Plaza, Canyon Side, and Amy Lyn Apartments.
- A booth was provided at Shoshone Medical Center's Kid's Health Fair where each child received a bag of educational information, goodies and healthy snacks.
- Informational flyers for EPA's work projects were posted and distributed to local municipalities throughout the year.
- Basin Bulletins and EPA project updates were distributed throughout the Site.
- Staff attended Silver Valley Transportation Team meetings.
- Tours of the Central Treatment Plant were provided to multiple groups.

- Outreach staff participated in Silver Hills Elementary School's trunk-or-treat, Kelloween, and Silver Mountain's Halloween trunk-or-treat events providing treat bags with lead safety messaging.
- Community Involvement Coordination meetings were attended to discuss community needs and outreach opportunities.
- Partnered with the Idaho Department of Health and Welfare's Childhood Lead Poisoning Prevention Program and Pediatric Environmental Health Specialty Units to provide a continuing education course for local health care professionals.
- Conducted 6 in-home follow-ups for individuals with high blood-lead levels or elevated house dust.
- A booth was provided at the Shoshone County Senior Health Fair where attendees received education and outreach on lead exposure and prevention.
- Outreach staff provided education, outreach materials, and giveaways to Mullan's Jeep Jamboree participants.
- New brochures were created and updated for use during 2025.
- Ran a Facebook Ad campaign from July 14th through August 16th.
- Published twenty-six Dirt articles in local newspapers.
- A lead safety poster contest for area third through fifth grade students was hosted to celebrate Lead Poisoning Prevention Week. Posters submissions were displayed at PHD's Kellogg Office.
- Ran a Play Clean photo contest during the month of August.
- Area schools were given posters and stickers to highlight National Handwashing Week.
- Attended South Fork Watershed Advisory Group meetings throughout the year.
- Outreach staff hosted a booth at the Silver Valley Care's Event at Kellogg Park, educating attendees on lead exposure.
- Provided presentations for Wallace Junior High history classes.
- Outreach staff attended multiple Music in the Park events, educating participants on the need for ICP permitting and lead exposure awareness.
- Attended Silver Valley Cares Sensory Carnival event, providing kinetic sand with glow germs activity with a hand-washing station.

Photo courtesy of Tracie Martinson.

Part 1

Work Performed Through Federal Superfund or Other Cleanup Programs

Lead Health Intervention Program (LHIP)

Screening of children for elevated blood lead levels has been occurring annually in the CDA Basin since 1996. For children with elevated blood lead levels, follow-up consultations from a public health professional are available through the Lead Health Intervention Program to assist families with identifying ways to reduce lead exposures. The screening program also informs the Basin cleanup efforts, although cleanup decisions are not based on annual blood lead testing results. The goal is to prevent lead exposures that could result in elevated blood lead levels.

The following table shows the Basin Blood Lead summary results from 2021 – 2025 for children residing in the Basin 6 months through 6 years of age.

Year	2021*	2022*	2023	2024	2025
Number of Children	19	40	94	129	126
Minimum (µg/dL)	<1	<1.0	<1.9	<1.9	<1.9
Maximum (µg/dL)	7	30	7	14.8	22
Average (µg/dL)	1.9	4.2	2.0	2.4	2.1
Geometric Mean (µg/dL)	1.5	2.2	1.8	2.0	1.7

***Venous test results only. In 2021 and 2022 additional children had capillary test results. Historically PHD used the Lead Care Plus model of machines to analyze the capillary draws, which has a minimum detection limit of 1.9 µg/dL. A recall of test kits for the Lead Care Plus machines issued on May 7, 2021, made test kits unavailable by the time of our 2021 screening. As an alternative, two Lead Care II model machines, which have a minimum detection limit of 3.3 µg/dL, were used. Because of this higher detection limit, venous drawings were encouraged and are reported here. Test kits for the Lead Care Plus machines have since been replenished.*

Panhandle Health District held its annual blood lead screening event August 11-16th. A total of 352 individuals had their blood lead levels checked during the screening event with 231 of those children 6 months through 6 years of age. Out of those individuals, 193 Basin residents were tested with 126 of those being children between the ages of 6 months through 6 years. There were an additional 21 individuals tested at other times throughout the year.

When an individual is identified with an elevated blood lead level, it is recommended their physician be notified and PHD offers appointments for in-home consultations to identify potential sources of exposure in and around the home[1]. These in-home consultations help PHD, and families, identify ways to reduce exposure risks. In addition, PHD can help identify potential exposure pathways that the cleanup project can address to prevent future lead exposures.

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[1] The Panhandle Health District (PHD) offers a follow-up consultation if any child has a blood lead level greater than 3.5 µg/dL, the "reference value" established by the Centers for Disease Control & Prevention (CDC) in 2021.

In 2025, the LHIP will continue to offer these additional services:

- HEPA vacuum loan program for cleaning residences.
- Free supplies to aid homeowners in performing safe home renovations and/or dirt disturbance activities.
- Free cleaning supplies for inside the home.
- Free dust mats.
- Free furnace filters.
- Education, outreach, and awareness for parents, children, community members, recreationalists, and visitors.
- Education classes and hands-on activities in local schools for Pre-K thru12th graders.
- Education and outreach at community events.
- Presentations and tours to community members, medical residents, and realtors, educating on the importance of lead exposure prevention.
- Sampling of soil, dust, paint, water, and other media as appropriate.

Basin Property Remediation Program (BPRP) including Private Drinking Water Supply

Sampling and cleanup of residential, commercial, common-use areas, and rights-of-way (ROWs) continued in 2025 as part of the Bunker Hill site's Basin Property Remediation Program (BPRP). DEQ implements this program in OU-1; the CDA Trust implements this program in OU-3.

Looking Southeast. Completion of soil sampling. Image provided by CDA Trust.

BPRP in the Box

To date, a total of 3,236 properties have been remediated in the Box with no new BPRP properties being completed in 2025. As was reported in 2022, DEQ continued to track the remaining nine Box properties that require remediation in case the current owners grant access, or the property changes owners.

BPRP in the Basin

The CDA Trust completed the following BPRP activities in 2025:

- Maintained six reverse osmosis, under-sink water filtration systems to treat drinking water from private sources.
- Collected 142 soil samples from four residential properties.
- Collected eleven private drinking water samples from three properties.
- Completed remediation of 3 properties.

At the conclusion of 2025, a total of 3,938 properties have been remediated in the Upper and Lower Basin of OU-3. 197 properties remain to be sampled whose owners have directly refused or have not responded to multiple requests for access. 37 properties remain to be remediated whose owners have refused remediation or have not responded to contact attempts.

Residential Soil Lead Directive

On October 20, 2025, EPA issued a Directive updating its guidance for investigating and cleaning up lead in residential soils. The Directive replaces the January 17, 2024, *Updated Residential Soil Lead Guidance for CERCLA Site and RCRA Corrective Action Facilities*. The Directive establishes a path to streamline response actions and provides clarity to the recommendations from EPA's January 2024 guidance. The Directive establishes:

- A regional screening level of 200 parts per million for lead in residential soil.
- A removal management level of 600 parts per million for lead in residential soil.
- A target children's blood lead level of 5 micrograms per deciliter to determine cleanup levels for a site.

Regional screening levels are used to help identify and define areas that may need further evaluation. Removal management levels inform the process to prioritize and define areas that may pose the greatest threat to human health. The regional screening levels and removal management levels are not default cleanup levels. Cleanup levels are developed after consideration of investigations, assessments, site-specific risks, and other relevant site information. Cleanup levels are used to trigger cleanup actions which are specified in EPA decision documents (such as Records of Decisions). While a screening level of 400 ppm was used for evaluations at the Bunker Hill Superfund Site, the soil lead level used to trigger cleanup actions ranges from 700 to 1000 ppm depending on the location.

EPA Region 10 and the State of Idaho (including Idaho Department of Environmental Quality and Panhandle Health District) are evaluating implementation options at Bunker Hill under the updated Directive to ensure the cleanup levels and actions remain protective. In 2025, work began to evaluate the need for changes to current residential soil cleanup levels. The work is ongoing and includes an assessment of the assumptions used to develop the cleanup levels currently in use at the site and ensure they are consistent with the recommendations in the recently release 2025

Directive. The initial results of this assessment are anticipated to be available for review by EPA and the State of Idaho in 2026.

Contaminated Waste Disposal and Management

Contaminated waste disposal and management is an ongoing process at the Bunker Hill site that must meet the demand for the disposal of historic mining related contamination generated under various remediation programs and under the Institutional Controls Program (ICP). Facilities to accommodate disposal of these wastes are engineered and constructed to reliably contain materials and prevent contaminants from being released to surface water, groundwater, or air in concentrations that will cause state and/or federal standards to be exceeded. Without the expansion of existing disposal facilities or the construction of new facilities, continued remediation and control of contamination could be compromised and potentially stopped.

Two Categories of Facilities utilized in 2025

Facilities in current use and development include the following:

- Repositories that are large, centrally located areas within the Upper and Lower Basin where contaminated soil and material excavated during remedial and ICP actions are transported to be managed and secured.
- Waste Consolidation Areas (WCAs) in the Upper Basin located adjacent to or near specified remedial action source areas.

Repositories

Six repositories received remedial action and ICP waste in the 2025 field season. The Page Repository, located near Smelterville and operated by DEQ receives remedial action and ICP wastes generated by the cleanup activities conducted in the “Box”. The Big Creek Repository (BCR) and the Big Creek Repository Annex (BCRA) near the community of Big Creek, the Lower Burke Canyon Repository (LBCR), and the Canyon Complex Repository (CCR) serve the Upper Basin, and the East Mission Flats Repository (EMFR) near Cataldo serves communities in the Lower Basin, all of which are operated by the CDA Trust.

ICP Management

The ICP area’s are managed by the CDA Trust’s and DEQ’s Operations Contractor’s throughout the year, excluding LBCR. LBCR does not accept waste during winter months because of heavy snow accumulation in Burke Canyon. During the winter closure period ICP waste will instead be directed to BCR for disposal. ICP waste from winter operations are stockpiled within the repositories for processing and future placement and compaction when conditions are suitable.

Stormwater management

- Storm water management controls including shredded wood, silt fencing, and other measures are installed to protect against erosion.
- Slopes are stabilized by track walking as necessary.
- Crowned center of waste area to encourage drainage to runoff collection areas.
- Year-end repository shutdown activities are completed as necessary.
- BCR, EMF, and Page are inspected weekly throughout winter months and haul routes are maintained for snow removal as needed.

Water Quality monitoring

Semiannual groundwater monitoring was conducted at all repositories except LBCR. Visual surface water monitoring is conducted at LBCR throughout the year. Groundwater and surface water monitoring results indicate that disposal activities have not impacted water quality near the repositories.

A summary of activities completed in 2025 at each repository is described below:

Page Repository

- Page received 2,805 truckloads of ICP waste, 631 truckloads of remedial action waste, 2,569 truckloads of coarse durable foundation materials, and 72 loads of woody debris.
- At the end of the 2025 construction season, the total estimated volume of material placed at Page was 23,425 CY of waste material and 22,950 CY of course durable foundation material.
- Page has approximately 413,000 CY of remaining waste capacity.
- Construction of cell #4 & #5 continued and initial work on cell #6 began.
- The Page Repository continues to use recycled construction materials extracted from Box and Basin waste streams, which helps to further reduce repository operating costs.

Aerial photo of Page repository. Photo courtesy of Northwind

Big Creek Repository (BCR)/ Big Creek Repository Annex (BCRA)

- BCR received 463 truckloads from the ICP, for an estimated 3,500 CY of waste placed and compacted.
- BCR currently has approximately 78,000 CY of remaining waste capacity.
- BCRA received 16 truckloads from the ICP for an estimated 190 CY of waste placed and compacted.
- BCRA has approximately 168,156 CY of remaining waste capacity.

Stormwater management

- Year-end repository shutdown activities were completed and included:
    - All road surfaces were graded and sloped inward to collect runoff to capture and prevent ponding.
    - Waste was graded and sloped inward to collect runoff to capture into roadside ditches.

ICP Management

The ICP area is managed by the CDA Trust's Operations Contractor during the winter closure period. Prior to spring runoff, all ICP waste resulting from winter operations will be transported and stockpiled on top of the BCRA repository for processing and future placement and compaction.

Water Quality monitoring

Semiannual groundwater and surface water monitoring was conducted at seven monitoring wells and six surface water locations on or near BCR/BCRA. Groundwater and surface water monitoring results indicate that disposal activities have not impacted water quality near the site.

Lower Burke Canyon Repository (LBCR)

- LBCR received 545 truckloads from ICP for an estimated 4,500 CY of waste placed and compacted.
- LBCR currently has approximately 1,015,000 CY of remaining waste capacity.
- LBCR decontamination facility was used to support Remedial Actions in Canyon Creek in 2025. Truck traffic from waste delivery at CCR was decontaminated at the LBCR decontamination facility prior to leaving the site.

Stormwater management

- Year-end repository shutdown activities were completed and included:
- Stabilized slopes by track walking.
- Maintained low area sump near decontamination pad to ensure that runoff from the asphalt area is contained on site.
- Maintained drainage swales around south end of fill limits to collect any runoff during rain on snow events.
- Crowned center of waste area to encourage drainage to runoff collection ditches.
- Installed additional storm water management controls including shredded wood and silt fencing on steep slopes to further protect against erosion.

ICP Management

The ICP disposal area will not be available to receive ICP waste through the winter months because of heavy snow accumulation in Burke Canyon. ICP waste will instead be directed to BCR for disposal.

Waste Delivery at LBCR

Canyon Complex Repository (CCR)

- CCR received waste materials from the Star Complex and Tamarack No. 7 mine remediation sites in Canyon Creek and for an estimated 127,000 CY of waste placed and compacted.
- CCR has approximately 1,100,000 CY of remaining waste capacity.

Stormwater management

- Year-end repository shutdown activities were completed and included:
- Stabilized slopes by placing and compacting 1-inch minus screened waste materials and applying copolymer for stabilization.
- Sloped top waste surface to promote stormwater runoff to the base drainage system.
- Cleaned and maintained existing stormwater controls such as culverts and check dams.

ICP Management

ICP wastes are directed to LBCR for disposal and are not currently placed at CCR.

Water Quality monitoring

Semiannual groundwater monitoring was conducted at eight monitoring wells and four surface water locations near CCR. Groundwater and surface water monitoring results indicate that disposal activities have not impacted water quality near the site.

East Mission Flats Repository (EMFR)

- EMFR received 991 truckloads from the ICP for an estimated 7,000 CY of waste placed and compacted.
- EMFR has approximately 140,000 CY of capacity waste remaining.

Stormwater management

- Year-end repository shutdown activities were completed and included:
    - All road surfaces were graded and sloped inward to collect runoff to capture and prevent ponding.
    - Waste was graded and sloped inward to collect runoff to capture into roadside ditches.

ICP Management

The ICP disposal area will be available at the east end of EMFR to receive ICP waste during the winter closure period and managed by the Trust's Operations Contractor. Prior to spring runoff, all ICP waste will be transported and stockpiled on top of the repository for processing and future placement and compaction.

Water Quality monitoring

Semiannual groundwater monitoring was conducted at six monitoring wells located on or near EMFR. Groundwater and surface water monitoring results indicate that disposal activities have not impacted water quality near the site.

Waste Consolidation Areas

Waste consolidation areas are located near, and accept waste from, specifically identified sources such as mine and mill site remedial actions implemented by EPA, the CDA Trust, and DEQ. Unlike repositories, footprints of WCAs are developed using current and near future waste estimates from nearby remedial action project areas and are constructed to be open for a shorter period. WCAs are only expanded if additional waste is encountered during the selected remedial actions.

The following Upper Basin WCA operated in 2025:

East Fork of Ninemile Creek Waste Consolidation Area (EFNM WCA)

Phase 3 Final Cover system construction began in 2025 and included the following:

- Approximately 480,000 sq-ft of geosynthetic liner and 1-inch minus cover material was installed over approximately 80% of the uncovered WCA footprint. The remaining 20% of area requiring cover system, along with final site grading, site stormwater features, stockpile management, and general project closeout tasks will be completed in 2026.
- Several stormwater features were constructed that included approximately 1,000 feet of permanent V-ditch, 1,200 feet of trapezoidal channel, and over 4,000 feet of temporary bench drainage channels to manage storm events and spring snow melt run-off.

- Site winterization activities were completed including BMP maintenance, securing access, constructing temporary stormwater features, and application of hydromulch for slope stabilization.

East Fork Ninemile Waste Consolidation Area final cover installation. Image provided by the CDA Trust.

Additional Disposal Locations

Mullan ICP Transfer Station

The CDA Trust operates the Mullan transfer station which provides the city of Mullan residents with a convenient place to dispose of their ICP waste which are then permanently disposed of in a locally engineered facility (e.g., the BCRA or LBCR).

In 2025, no waste was transported from the Mullan ICP Transfer Station to the LBCR.

Dredge Road WCA

After several years of study, EPA selected the CDA Trust-owned property adjacent to Dredge Road and west of Cataldo as the location of a new waste consolidation area for cleanup projects in the lower Coeur d'Alene River Basin in 2025.

Upper Basin & Box Remedies

The 2012 Upper Basin RODA identified cleanup work in the Upper Basin. The goals of the 2012 Upper Basin RODA cleanup include prioritizing Upper Basin/Box source areas for cleanup to improve water quality and address risks to human health and the environment. It called for cleanup in the Box that would improve water quality in the South Fork Coeur d'Alene River. It also focused on source control actions that address particulate lead which poses a risk to human health and ecological receptors. The prioritized cleanups under the 2012 Upper Basin RODA will continue to reduce human and wildlife risks to lead and other heavy metal exposures in the Upper Basin and are expected to significantly improve water quality. Upper Basin cleanups complement those in the Lower Basin by reducing the overall loading of contaminated materials to the Coeur d'Alene Basin watershed and the potential for recontamination in the Lower Basin.

The Box

Central Impoundment Area Sludge Pond Closure

The old sludge pond on top of the Central Impoundment Area (CIA) reached its storage capacity in June 2023. Since then, sludge from the Central Treatment Plant (CTP) has been stored in new lined ponds constructed to the east of the old sludge pond as part of the CTP upgrade project.

In 2025, construction crews closed and capped the old sludge pond. The sludge pond cover system ties into the existing CIA cover system, consists of compatible materials, and meets the same performance standards. The final cover was hydroseeded in August 2025.

Capped Sludge Pond looking southwest. Photo courtesy of DEQ.

Pinehurst Elementary School

The Pinehurst Elementary School serves many of the children living within the Box and others residing in the Lower Basin. Large sections of the playground are deteriorated, leaving children exposed to underlying soil contamination. In 2025, crews removed existing deteriorating barriers of asphalt and concrete, as well as existing playground surface coverings. Clean subsurface

material, asphalt, concrete, turf, and flexi-pave were installed as caps to protect from contaminated soils across the project area. Crews left existing playground equipment in place or relocated and reinstalled it on site.

East Smelterville Flats

The 16-acre East Smelterville Flats site (site) is located east of the Shoshone Country Airport and north of I-90 in Kellogg, Idaho. The undeveloped site is owned by the City of Kellogg and is used as a maintenance yard with the eastern portion zoned to be a public park. The area provides open space for the public to access the South Fork of the Coeur d' Alene River northeast of Smelterville, Idaho.

The site is contaminated with historical mine tailings and waste. Soil sampling indicates contaminated material is present from the surface down to depths ranging from five to eight feet. This project will protect the public from exposure to heavy metals contained in the underlying contaminated material, protect against recontamination of clean barriers, and will eliminate transport of fugitive dust and tracking of contaminated material off-site.

Work crews removed vegetation and re-graded the 14.9-acre site to improve drainage. Crews installed 77,250 square yards of barrier fabric across the site and then imported 46,550 cubic yards of clean fill to cap the property. Concrete oasis viewing pads were installed along with an ADA parking access point.

Facing west showing excavation of top foot of contaminated soil along south edge of Theater Bridge Road. Photo courtesy of Idaho Department of Environmental Quality.

Kellogg Sidewalks Replacements

To reduce people's exposure to contaminated soil lying beneath deteriorated sidewalks, EPA and the Idaho Department of Environmental Quality identified select areas of sidewalks in uptown Kellogg for replacement. Contaminated materials, including lead and arsenic, seep up to the surface through cracks and can be tracked into homes. Between July and October of 2025, DEQ contractors removed about 2,200 linear feet of old, deteriorating sidewalks and replaced them with similar-width sidewalks that include modern, safe pedestrian ramps.

Government Gulch

In 2025, groundwater and surface water quality data was collected to characterize the surface water/groundwater interactions, groundwater flow conditions, and metals migration within Government Gulch.

This data supports the development of an updated conceptual site model to assess potential remedial action decisions and evaluate if the selected groundwater remedy for Government Gulch would be cost effective or not.

Central Treatment Plant and Groundwater Collection System

Operations and maintenance were conducted throughout 2025 to continue water treatment at the Central Treatment Plant (CTP) by DEQ's contractor. During 2025, the CTP treated 1.074 billion gallons of water, 52.4% of this was mine water from Bunker Hill Mining Company and 47.6% was ground water from the Groundwater Collection System. A few non-routine maintenance tasks were required during 2025, including work accompanying 2 outages at the plant in March and December. The efficiency of the CTP remained high throughout 2025, with removal efficiency for Zinc over 99% and Cadmium and Lead over 98%. During 2025 sludge produced from the CTP was sent to the new Sludge Impoundment Area targeting a sludge density of 25% solids. Water monitoring was completed during high and low flow and results will be available in the annual BEMP report.

East Fork Ninemile Creek Drainage (EFNM)

The following summarizes the 2025 construction activities conducted in EFNM:

- **EFNM WCA:** Construction of the EFNM WCA final cover system. (see separate section in this report titled "Contaminated Waste Disposal Areas and Management").
- **Monitoring:** Continued surface water monitoring in the EFNM Basin.
- **Operations and maintenance (O&M):** O&M of the Interstate Callahan Mine Rock Dumps, the Success Mine Complex, Interstate Millsite. and Rex Mine No. 2/ Sixteen-to-One.

Pine Creek Drainage

In 2025, activities in the Pine Creek drainage consisted of the following:

- **Douglas Complex:** Completed Remedial Action (RA) construction at the Douglas Complex. Construction activities included excavation and consolidation of approximately 26,000 CY of mine wastes and installation of approximately 14,700 sq-ft of geosynthetic liner system and cover materials over the consolidated mine wastes.

Douglas Complex during following excavation and site grading. Image provided by the CDA Trust.

Canyon Creek Drainage

In 2025, activities in the Canyon Creek drainage consisted of the following:

- **Star Complex:** Approximately 48,000 CY of mine waste rock and tailings were hauled from the Star Complex and placed and compacted at the CCR. In addition, approximately 850 feet of Canyon Creek stream channel was re-constructed as part of the project.

Star Complex during waste excavation (left) and after site grading and stream reconstruction (right). Images provided by the CDA Trust.

- **Tamarack No. 7:** Approximately 111,000 CY of mine waste rock and tailings were hauled from the Tamarack No. 7 and placed and compacted at the CCR. In addition, approximately 2,020 feet of Canyon Creek stream channel was re-constructed as part of the project.

Tamarack No. 7 during waste excavation (left) and after site grading and stream reconstruction (right). Images provided by the CDA Trust.

- **Standard-Mammoth Reach:** Conducted design activities at the Standard-Mammoth Reach (10 sites) located in the upper reaches of Canyon Creek.
- **Flynn-Black Bear Fraction:** Conducted pre-construction activities in preparation for project bidding planned for early February of 2026.
- **Frisco-Black Bear Reach:** Conducted design activities at the Frisco-Black Bear Reach (9 sites) located in the upper reaches of Canyon Creek.
- **Lower Canyon Creek Riparian Area:** Continued characterization and sampling activities within the Lower Canyon Creek Riparian Area located in the lower reaches of Canyon Creek.
- **Monitoring:** Continued surface water and groundwater monitoring in the Canyon Creek Basin.
- **Canyon Creek Quarry:** Continued development of the Canyon Creek Quarry (CCQ). The CCQ will supply clean aggregate materials to future Canyon Creek remedial action projects.

Other activities conducted in 2025 included the following:
Repository Operation: Operation of the Canyon Complex Repository/WCA (see separate section in this report titled “Contaminated Waste Disposal Areas and Management”).

South Fork Coeur d’Alene River Drainage

In 2025, activities in the South Fork Coeur d’Alene River (SFCDR) drainage consisted of the following:

- Conducted initial characterization and sampling activities in the Upper South Fork Coeur d’Alene River Riparian area located upstream of Wallace.
- Conducted initial characterization and sampling activities in the Middle South Fork Coeur d’Alene River Riparian area from Wallace downstream to the Box.
- Conducted surface water monitoring in the South Fork Coeur d’Alene River.

Lower Basin Remedies

The cleanup described in the 2002 OU-3 ROD for the Lower Basin includes actions for the wetlands and lateral lakes, the riverbanks, splay areas, and riverbed. These remedial actions, envisioned primarily as pilot studies, are being evaluated for implementation. The remediation objectives in the Lower Basin include reducing risks to human health and wildlife by reducing exposure to particulate lead and improving habitat quality in the CDA River system. Remedies that address human health or ecological exposure, coupled with continued evolution of our understanding of sediment transport and recontamination in the Lower Basin, are interconnected with natural resource restoration actions.

Gray's Meadow Remedial Action and Restoration

In 2025, EPA continued and completed construction at the Gray's Meadow (formerly Black Lake Ranch) project. Gray's Meadow is a collaborative effort between the EPA, the CDA Trust, and the Restoration Partnership with Idaho Department of Fish and Game as the primary landowner, to remediate and restore approximately 700 acres of publicly owned contaminated agricultural land to clean, diverse, productive wetlands and riparian waterfowl/wildlife habitat.

In 2025, progress on the Gray's Meadow project included:

- Cultural resource monitoring activities for both the Cave Lake and Lamb Peak Wetlands.
- Localized dewatering of the Cave Lake and Lamb Peak Wetlands.
- Dust control operations to support excavation and construction activities across the site.
- Excavation of approximately 100,000 CY and placing more than 148,000 CY of soil that were consolidated on site and used to build loafing islands and water control berms to create the wetland basins. The 2025 excavation and placement activities brought the project total to over 1 million CY of excavated and placed soil.
- Seeding of over 635 acres of cultivated seedbed within the Cave Lake and Lamb Peak Wetlands.

For more information on restoration projects that were implemented (or initiated) in the Lower Basin, please refer to the Restoration Partnership section of this report.

Gleason Wetland

EPA and the Coeur d'Alene Trust continued site investigation activities for the Gleason Wetland which will be the next agricultural-to-wetland conversion project. The site is nearly 270 acres of metal-impacted agricultural land in the floodplain of the Coeur d'Alene River, located on East Killarney Lake Road off Idaho State Highway 3. The purpose of the project is to remediate the site and restore it to clean, diverse wetland habitat similar to the goals of Gray's Meadow. To prepare for remedial design, water levels in monitoring wells and stilling wells have been continuously monitored via pressure transducers since 2022 to evaluate ongoing water elevation changes

across the site. Soil samples and geotechnical data collected in 2025 will be evaluated to improve the understanding of the soil material across the site and how it can be used to build potential habitat features and embankments as needed. The project is anticipated to be designed in 2026 and 2027 and constructed in 2028 and 2029.

Aerial view of Swan Lake (left), the Coeur d'Alene River (middle), and the Cave Lake Wetland (right) during the high flow event in December 2025. Photo courtesy of the CDA Trust.

Aerial view of the Lamb Peak Wetland in February 2025. Photo courtesy of the CDA Trust.

River Channel Data Collection and Design

In 2025, data collection and design efforts associated with the river channel included the following:

- 2025 Cataldo Reach Riverbank 2 Investigation: Collection of soil and sediment samples for metals analysis from 10 areas of interest in the Cataldo Reach, as well as the section of the SFCDR between the Box and the confluence with the North Fork Coeur d'Alene River. At each area of interest, sampling included collection of soil and sediment samples for metals analysis.
- Riverbank erosion pin monitoring at 63 locations in the Coeur d'Alene River. The number of monitoring stations per reach are below:
    - Cataldo Reach: 36
    - Dudley Reach: 12
    - Killarney Reach: 10
    - Springston: 5
- Completion of the 30% Design Cataldo Riverbank Pilot Project at river mile 165.9 – 167.1 of the Coeur d' Alene River.

River Mile 165.9 – 167.1 Riverbank Design Focus (Left) River Mile 160 Riverbank Near Cataldo Mission Boat Launch Cataldo Riverbank Pilot Project (Right). Photo courtesy of CDA Trust.

State of Washington Projects

The Department of Ecology continued to monitor Spokane River beaches to ensure the continued protection of recreationalists and to track redeposition of contaminated material. Beaches were monitored using x-ray fluorescence equipment, and visually surveyed for evidence of usage or degradation of cap material. No unexpected trends or cap damage was observed.

Recreational Sites Program

In 2025, work under the Recreational Sites Program included sampling, placement of access controls and installation of new signs, and public education/outreach activities for areas in both the Box and Basin. The Program also includes a workgroup with members from the EPA, the Coeur d'Alene Tribe, IDEQ, PHD, CDA Trust, IDFG, IDPR, USFS, and BLM.

Box Activities

EPA, DEQ, the Coeur d'Alene Tribe, and PHD continued public outreach efforts to inform recreational users of ways to protect their health when recreating in areas where they may be exposed to contaminated soils and water. During 2025, one recreational area was sampled that is accessed by the public and will be evaluated for next steps. Also in 2025, DEQ and PHD worked with the City of Wardner to ensure park wood chip barriers are maintained as cover for contaminated materials below the playground based on 2024 sampling data.

Basin Activities

During 2025, work focused on recreational sites in the Lower Basin. EPA and the Coeur d'Alene Trust installed access controls and signage at a recreational site near Medimont to reduce exposure to contaminated soils and sediment. Sampling was also conducted at two previously remediated recreational sites in the Lower Basin following the December 2025 high-flow event in the Coeur d'Alene River to monitor for recontamination in these areas.

In addition, design activities were completed for an informal recreational area within Killarney Lake. It is anticipated that actions will be implemented at this site in 2026 to help reduce exposure to contaminated soils and sediment in the area.

In 2025, PHD updated the Basin recreational brochures, and the brochures were reviewed by DEQ, the Coeur d'Alene Tribe, and the Trail of the Coeur d'Alene's Trail Commission and are planned for mailing in 2026.

EPA and the CDA Trust, along with partners on the Recreational Sites interagency workgroup, continued to evaluate other recreational areas in the Upper and Lower Basin for future cleanup work.

Vehicle access controls and recreational signs at Hill Camping Area Medimont. Photos courtesy of CDA Trust.

Basin Environmental Monitoring Program

The Coeur d'Alene Basin Environmental Monitoring Program (BEMP) supports the Bunker Hill Site's OU2 and OU3 decision documents by establishing a site-wide environmental monitoring plan for the collection, analysis, and interpretation of environmental data. Environmental data includes surface water, sediments, groundwater, and biological resources. The goal of the BEMP is to provide a framework for how the environmental monitoring data will support management goals, guide and prioritize remedial actions, and document progress toward Remedial Action Objectives (RAOs).

Programmatic Plan

In 2021, the BEMP Programmatic Plan was updated to optimize how environmental monitoring requirements in OU2 and OU3 will be met. This environmental data is used to assess long-term trends of contaminants in site media, evaluate the effectiveness of pilot projects and remedial actions, evaluate progress toward meeting RAOs, and improve the understanding of environmental processes in the Coeur d'Alene Basin. The BEMP Programmatic Plan incorporates adaptive management principles to provide flexibility and is anticipated to evolve over time during the cleanup and is structured into three geographically based tiers that range in size from the narrow focus of cleanup actions at specific sites to a Basin-wide focus to see the "bigger picture." These geographically based tiers include:

- Site-specific Remedial Action (RA) effectiveness and performance monitoring,
- Area-wide monitoring, and
- Basin-wide long-term monitoring.

Site-specific RA effectiveness and performance monitoring is geographically the smallest tier with a focus on sites with implemented RAs and waste consolidation areas/repositories and the effectiveness on groundwater, surface water, sediments, and biological resources. Area-wide monitoring focuses on geographical areas encompassing multiple source sites with a wider focus

on changes in an area from cumulative remedial actions. Area-wide monitoring focuses on ecological and biological monitoring as applicable to the area (birds, fish, and/or benthic macroinvertebrates). Area-wide examples include watersheds, wetlands, lakes, and river reaches (e.g., Ninemile Basin, Canyon Creek Basin, and the Lower Basin). Site-wide monitoring is geographically the largest tier as it focuses on surface water throughout the entire BHSS. RA effectiveness monitoring plans are created for each monitoring tier as specified in the BEMP framework.

Multi-Agency Collaboration

An interagency workgroup consisting of technical staff from DEQ, USGS, USFWS, the Coeur d'Alene Tribe, the Coeur d'Alene Trust, and EPA meets annually to share and review basin-wide environmental monitoring results. This collaboration encourages all partners to stay updated on the wide variety of projects and research being conducted. The annual workgroup meeting also allows for the opportunity to discuss data trends and make recommendations for future actions. The workgroup assists with the development of environmental monitoring plans, such as the Canyon Creek Basin Area-Wide Remedial Action Effectiveness Monitoring Plan prepared in 2023 and the upcoming Lower Basin Area-Wide Remedial Action Effectiveness Monitoring Plan (anticipated in 2026).

Environmental Monitoring

Environmental monitoring conducted in 2025 is outlined below:

Surface Water

In 2025, the USGS collected water quality samples from 20 sites as part of the surface-water BEMP. Four sites in OU2 were sampled twice. Sixteen sites in OU3 were sampled under a variable frequency schedule ranging from four to twelve times per year. Sampling up to twelve times per year is expected to help better characterize conditions in the Lower Basin and inputs to Coeur d'Alene Lake, which was recommended in the 2022 report from the National Academy of Sciences, Engineering, and Medicine (https://nap.nationalacademies.org/catalog/26620/the-future-of-water-quality-in-coeur-dalene-lake).

Samples were collected during a range of hydrologic events: winter storm conditions in March, peak runoff conditions in early May, baseflow conditions in September, and fall storm conditions in November. All samples were analyzed for nutrients, selected trace metals and major ions, and suspended sediment. In addition, 32 samples were analyzed for total and filtered mercury. Three OU2 sites were also sampled two additional times (during winter low flows in January and runoff recession in July) to help evaluate efficacy of the groundwater collection system.

Twelve of the sixteen OU3 sites are collecting continuous streamflow data and are telemetered with real-time streamflow access. Information can be viewed at https://waterdata.usgs.gov/state/Idaho/. The annual data summaries will be completed and delivered to EPA during the second quarter of calendar year 2026.

Groundwater

Groundwater monitoring continued for remedy effectiveness monitoring of the Groundwater Collection System (GCS) at the CIA. During high flow conditions in May, 95 monitoring sites were visited, and groundwater samples were collected from 56 monitoring wells, 3 piezometers, and 9 extraction wells. During base flow conditions in October, 95 monitoring sites were visited, and groundwater samples were collected from 72 monitoring wells, 3 piezometers, and 9 extraction wells. In 2025, additional groundwater and surface water samples were collected for Government Gulch to improve site characterization including groundwater and surface water interaction.

The laboratories analyzed samples for metals, phosphorus, and other parameters. Sampling was conducted to capture baseline data across the site that reflects the conditions of groundwater quality following stabilization of hydrogeologic conditions to full GCS pumping operations and to characterize groundwater quality at the A-4 Gypsum Impoundment. EPA and DEQ are currently reviewing preliminary data from the 2025 baseflow sampling event which will be evaluated in the 2025 Annual Groundwater Quality Report for OU2. Water level monitoring continued through 2025 with approximately 72 in situ transducers installed across the site; water level data will also be incorporated into the Annual Report. The next water quality monitoring effort will be performed during high flow conditions around April/May 2026.

Suspended Sediment

Suspended sediment sampling is conducted to obtain information regarding the amount and characteristics of sediment being transported at specific times and locations in the river system. The CDA Trust currently collects suspended sediment samples opportunistically by boat during high-flow events only. The criteria for conducting opportunistic sampling of suspended sediment is based on several factors such as predicted flows and water levels in Lake Coeur d'Alene. The Coeur d'Alene River experienced a high flow event in December 2025 that was targeted for sampling; however, due to flooding across the northwest region, hazardous conditions prevented sampling crews from mobilizing to the site safely. A high flow sampling event was not completed in 2025.

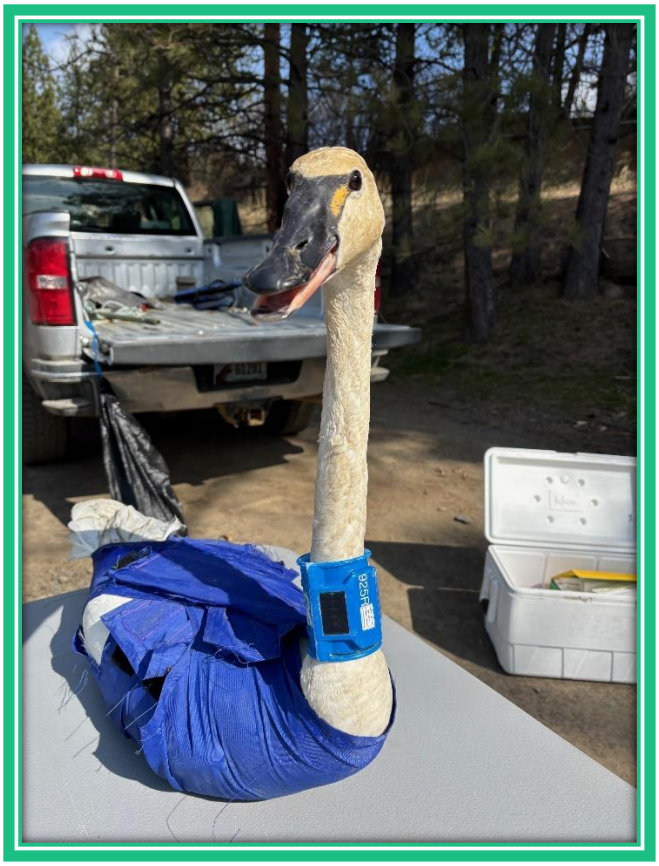

Photo courtesy of EPA

Biological Resources

The USFWS conducted annual waterfowl surveys from early February to late April in Lower Basin floodplain wetlands, recording observations of waterfowl use and tundra swan mortalities during the spring migration. In 2025, EPA scientists continued working with state, federal, and Tribal partners on a collaborative effort to monitor migratory birds that rely on Coeur d'Alene River basin resources for survival.

An EPA-lead waterfowl study on both tundra swan and wood ducks monitoring continued in 2025. As swans forage deeply for rooted aquatic plants, they incidentally ingest contaminated sediment with lead concentrations that can be many times greater than the concentration considered safe for waterfowl, often leading to impairment and death. Wood ducks nest throughout the Lower Coeur d'Alene river basin and forage on invertebrates in shallow sediment, providing the study with a different exposure indicator of Pb contamination compared to Tundra Swans. The objective of the study is to develop efficient and cost-effective surrogate monitoring tools for swans (feces) and wood ducks (eggshells) to allow for long term tracking of remedy effectiveness. It will also provide information for project remedial design to ensure waterfowl most susceptible to lead exposure access clean areas preferentially instead of unremediated wetlands with high lead concentrations.

Data Management

Data management is an ongoing process that requires utilization of an interagency workgroup for implementation to ensure consistency, completeness and consensus of data warehoused. Under the 2023 interagency Bunker Hill Site Data Management Plan (DMP), data and access platforms continue with ongoing development. Until these tasks are complete, stakeholders can make specific data requests to the EPA Remedial Project Manager (Jennifer Crawford) associated with the work being conducted.

Part 2

Other BEIPC Activities and Responsibilities

Lake Management Activities

The Coeur d'Alene Lake Management Plan (LMP), developed by the CDA Tribe and DEQ, was finalized in 2009. Since then, the CDA Tribe and DEQ have been implementing core aspects of the LMP such as water quality monitoring, modeling, nutrient source inventories, fostering partnerships, and education/outreach activities.

In 2018, in response to undesirable lake water quality trends, the CDA Tribe asserted that the LMP has been inadequate, as implemented, as an effective tool to protect water quality in the Lake. The CDA Tribe withdrew their support of the LMP, as an alternative to a CERCLA remedy, in 2019. DEQ's response to these trends included enlisting a third-party review of lake data and pursuit of on-the-ground improvement projects to reduce phosphorus inputs. DEQ continues to operate under the LMP and to evaluate recommendations from the third-party review report, as detailed below.

National Academy of Sciences & Coeur d'Alene Lake Advisory Committee

As stated in the LMP, "In the event that monitoring data reveals trends that approach a trigger level for one or more constituents, this will prompt a comprehensive review to identify the causes of the trend and guide development of a corrective management response." In line with this, in 2019, at the Our Gem Coeur d'Alene Lake Symposium, Idaho Governor Brad Little called for a neutral third-party review of Coeur d'Alene Lake data to take a closer look at observed water quality trends and guide management decisions moving forward.

In 2020, the State of Idaho, Kootenai County, and EPA sponsored a contract with the National Academy of Sciences, Engineering, and Medicine (NAS) to conduct this review of Coeur d'Alene Lake data. The final report was completed in 2022 (https://www.nationalacademies.org/our-work/the-future-of-water-quality-in-coeur-dalene-lake). Observations and recommendations from the NAS report are being used to help guide DEQ's lake management actions moving forward.

While the NAS review was underway, recognizing community concern that on-the-ground action needed to occur, Governor Little launched the Leading Idaho Initiative for Coeur d'Alene Lake. This initiative provided funding for projects throughout the Coeur d'Alene Basin intended to reduce

phosphorus loading to the lake. Between 2020 and 2024, $35 million dollars was allocated for this purpose. Governor Little appointed the Coeur d'Alene Lake Advisory Committee (CLAC) to prioritize projects proposed for this funding. Implementation of Leading Idaho projects is ongoing. The CLAC includes membership from the Coeur d'Alene Tribe, City of Coeur d'Alene, Kootenai County, Kootenai Environmental Alliance, Hagadone Marine, community business owners, a Coeur d'Alene lakeshore property owner, and members of the public at large.

Discussions among the CDA Tribe, DEQ, and EPA related to NAS recommendations and future lake management activities are ongoing and may be shaped by deliberations of the Science Coordination Team (SCT). The objectives outlined in the LMP and listed below continue while additional approaches to augment lake management work are being considered.

DEQ Lake Management Activities

DEQ Lake management accomplishments in 2025 consisted of the following activities:

Science Core Program

- One recommendation from the NAS was the need to better coordinate data collection, utilization, and reporting throughout the basin. DEQ convened a SCT in 2023, including representatives from DEQ, the CDA Tribe, EPA, USGS, and the University of Idaho. The SCT developed a priorities document in 2025 that is intended to provide guidance to science-related efforts in the basin to accomplish a more coordinated effort. DEQ has provided representation on the SCT and funding for the group's facilitation through September 2026.
- Routine CDA Lake core monitoring.
- Coordination with AVISTA, the Idaho State Department of Agriculture (ISDA), and CDA Tribe staff on aquatic plant surveys and responses to infestations of aquatic invasive species.
- Coordinated with the University of Idaho on a continued wave/wake study to better understand the impacts of waves on nutrient and metals entrainment into the water column in Coeur d'Alene Lake. This study is partially funded by Kootenai County.
- Continued evaluation of river hydrography, DEQ electronic sonde data from 2014 – 2019, lake wind fields, preliminary AEM3D modeling, and data from a stable isotope study from 2015.Coordinated with Alta Science and Engineering to conduct a risk-based evaluation of recreational areas around Coeur d'Alene Lake and the Spokane River. Field work was completed in 2024, and a draft report was completed late 2025. Results were presented at the August BEIPC meeting. This study was pursued in response to concerned citizens and a recommendation of the NAS review and is a more focused repeat of data collection and analyses performed in the late 1990s.

Education & Outreach Core Program Activities

- Provided updates on Coeur d'Alene Lake management activities for a variety of community groups and the public.
- Participated in The Confluence Project (TCP) steering committee, teacher workshops, classroom activities, and field trips for high school students (including the Youth Water Summit).
- Participated in the Our Gem Coeur d'Alene Lake Collaborative (OG Collab), providing regular articles to the CDA Press related to the lake, including Leading Idaho information and updates.
- Participated in the Coeur d'Alene Regional Chamber of Commerce Natural Resource Committee.
- Coordinated with the Bay Watchers program, organized by the U of I through the Idaho Water Resource Research Institute, exploring ways to expand volunteer monitoring.
- Participated in the Panhandle Stormwater and Erosion Education Program (SEEP) steering committee and assisted in delivering educational programming related to water quality to the construction/development community.
- Helped to initiate the Living Lake Project with the Coeur d'Alene Arts and Culture Alliance. This project will provide relevant information about Coeur d'Alene Lake's history and current challenges to a cohort of artists that will develop creative ways of sharing these messages to the community.

Nutrient Inventory/ Nutrient Reduction

- Developed a report of tributary data collected for 11 tributaries and 10 smaller drainages to CDA Lake to fill data gaps identified in the basin-wide nutrient inventory report.
- Continued to coordinate with the CDA Tribe on their Leading Idaho award to fill data gaps in tributaries to the southern end of CDA Lake, including the St. Joe and St. Maries Rivers and other smaller tributaries to the southern end of the lake.
- Continued working with recipients of Governor Little's Leading Idaho Initiative funding to implement projects throughout the basin to reduce phosphorus loading to CDA Lake. Project implementation began in 2021 and continued through 2025:
    - *South Fork Sewer District (SFSD) tertiary wastewater treatment project*
        - Construction for the necessary building and treatment area went out to bid in 2025.
    - *Santa-Fernwood wastewater treatment upgrade*
        - Plans are under development for improvements and land application of treated wastewater.
    - *City of Coeur d'Alene Stormwater Outfall Volume reduction projects*
        - The last of four stormwater outfall capture/treatment projects was completed.
    - *City of Kellogg Stormwater Improvements*
        - Four more outfall projects were completed, for a total of seven. Inventory and assessment have also been completed in outlying areas of the city, and this information will help prioritize future improvements.

Partnerships with Other Entities

- Following recommendations of the NAS review report, worked with Alta Science and Engineering to continue progress of the Coeur d'Alene Basin Science Coordination Team (SCT).
- Coordinated with AVISTA Corp to identify and prioritize projects to enhance wetland habitat, reduce stream/riverbank erosion, and improve fisheries throughout the Basin, in addition to monitoring aquatic invasive species in CDA Lake and tributary rivers.
- Participated in the Coeur d'Alene Regional Chamber of Commerce Natural Resource Committee, the OG Collab, Panhandle SEEP, the 4-County Natural Resource Committee, Bay Watchers, and other groups focused on water quality protection to facilitate communication and collaboration.
- Participated in the development of the Living Lake Project with the Coeur d'Alene Arts and Culture Alliance.
- Facilitated and participated in Panhandle Basin Advisory Group meetings.
- Organized/participated in Watershed Advisory Group meetings for the North and South Fork Coeur d'Alene River watersheds.
- Worked with the BEIPC Executive Director to provide Lake updates for the BEIPC.

This continued level of coordination with BEIPC forums maximizes opportunities for information exchange and advice, while recognizing that DEQ retains its respective decision-making authorities.

Coeur d'Alene Tribe Lake Activities

In 2022, Tribal staff worked with DEQ to assess the National Academy of Sciences priorities moving forward and worked with the CDA Lake Advisory Committee on ranking projects that were submitted from numerous stakeholders in the Basin. In 2023, the Tribe was awarded ARPA funding to initiate the implementation of the St. Joe Watershed Nutrient Assessment project through the end of State calendar year 2026. In 2025, Tribal staff continued to participate in the Lake Science Coordination Team. The Tribe also continued work on the Paleolimnological study of CDA Lake sediments in 2025 with DEQ, University of Oregon, Indiana State University, and other partners. In 2025, the Restoration Partnership awarded supplemental funding for this work to continue in 2026.

Discussions among the CDA Tribe, DEQ and EPA have continued in order to determine what additional mechanisms/actions are needed to manage the hazardous materials in the lakebed sediments. Therefore, although various aspects outlined in the LMP and listed below are essential to continue, additional approaches to augment work conducted under the auspices of the LMP are being reconsidered by the Tribe. These discussions are ongoing.

CDA Tribal Lake Activity accomplishments in 2025 consisted of the following staff activities:

Science Core Program

- Routine Lake water quality monitoring and modeling by the Tribe continued through 2025.
- Tribal staff continued their milfoil control program in southern waters during 2025, including bottom barriers and mechanical harvester treatments. The Tribe has also continued to monitor treatment efficacies and native plant community dynamics. Control efforts are focused at high-use public sites such as boat launches, swim areas, and boating lanes. Mechanical harvesting is used to remove nuisance aquatic vegetation from high-use sites at Benewah Lake, Chatcolet Lake, and Round Lake. Harvesting also helps remove an oversupply of nutrients from nearshore areas. In 2025, the Tribe removed approximately 313,588 lbs. (wet mass) of aquatic vegetation in the summer of 2025, which translates to 123 lbs. (dry mass) of phosphorus and 621 lbs (dry mass) of nitrogen.

Education & Outreach Core Program

- Throughout 2025, Tribal staff provided updates on Lake activities to a variety of community groups and made presentations to the public upon request.
- In 2025, Tribal staff worked with the Confluence Project (TCP) and Coeur d'Alene Basin high school science classes with hands on based research on water quality, groundwater, and snow water equivalency which included science field trips for high school students and teachers in North Idaho.
- The Our Gem CDA Lake Collaborative (Collaborative) worked throughout 2025 to provide regular articles in the CDA Press related to CDA Lake and water quality conditions to keep this subject present in the community. For more information on the articles visit: https://iwrri.uidaho.edu/outreach-our-gem/ The Collaborative is made up of the Tribe, DEQ, U of I Community Water Resource Center (CWRC), Idaho Water Resources Research Institute (IWRRI), Kootenai County, Kootenai Environmental Alliance, the BEIPC, and the Coeur d'Alene Regional Chamber of Commerce.
- Tribal staff continued to work with the CDA Regional Chamber of Commerce Natural Resource Committee to implement the "Local Gems" program.
- Tribal staff continued to collaborate with the U of I IWRRI and agency partners to conduct Bay Watchers workshops for CDA Lake Bay community involving volunteers/liaisons utilizing combined virtual and in-person meetings.
- In late 2025, OG Collab started planning discussions for the 2026 Lake Week event which is being planned for July 2026.
- Tribal staff provided Lake updates to the Benewah County Realtors in 2025.
- Tribal staff assisted in manning the 2025 BEIPC booth at the North Idaho Fair.

Lake and River Water Quality Sampling 2025

- Tribal staff continued to sample from the CDA River at Harrison, St. Joe River, Chatcolet Lake, and CDA Lake sampling locations.
- Tribal staff continued data analysis and writing the water quality reports for CDA Lake and the Tribe's Limnologist continued calibration of the AEM3D CDA Lake model.

St. Joe River and Southern Lake Tributary Nutrient Assessment

- As part of the basin-wide effort to address nutrient loading to the southern end of Coeur d'Alene Lake, DEQ, in coordination with the Coeur d'Alene Tribe, continued implementation of a targeted nutrient assessment for the St. Joe River watershed and associated southern lake tributaries. This work is intended to address key data gaps identified in previous nutrient inventories and to improve understanding of nutrient sources, transport, and loading under a range of hydrologic conditions.
- Field activities included establishment and maintenance of a distributed monitoring network across the St. Joe River mainstem and selected tributaries, incorporating discrete water chemistry sampling, discharge measurements, and continuous water-level monitoring at strategically selected locations. Sampling was designed to capture baseflow, transitional, and storm-driven conditions to support event-scale nutrient load estimation and comparison among tributaries.
- Data analysis focused on developing preliminary stage–discharge relationships at sites with sufficient paired water-level and discharge data, evaluating spatial and temporal patterns in nitrogen and phosphorus concentrations and loads, and assessing data quality through routine QA/QC analyses (field duplicates, equipment blanks, and detection limit evaluations). Results to date indicate that nutrient loading patterns in the St. Joe system are strongly influenced by hydrologic variability and cumulative tributary inputs, with several tributaries consistently contributing higher nutrient loads relative to their concentrations due to discharge magnitude.
- This ongoing work supports broader Leading Idaho Initiative objectives by providing site-specific, defensible information to inform prioritization of nutrient reduction strategies in the southern lake basin. Coordination between DEQ and the Coeur d'Alene Tribe on study design, field implementation, and data interpretation continues, and results from this assessment will be integrated with other basin-wide monitoring and modeling efforts to improve management decision-making for Coeur d'Alene Lake.

Partnerships with Other Entities

- Tribal staff continued to be involved in the Panhandle Basin North fork and South fork CDA River Watershed Advisory Group meetings as well as the Basin Advisory Group.
- Tribal staff worked with the BEIPC ED to provide Lake updates to the BEIPC during quarterly meetings upon request.
- Tribal staff continued coordination with local governmental entities and CDA Regional Chamber of Commerce Natural Resources Committee.
- The Coeur d'Alene Tribe hosted a boat tour of the southern portion of Coeur d'Alene Lake and the Lower Coeur d'Alene River to the BEIPC Board and their representatives the week of the 2025 August BEIPC meeting.

This continued level of coordination with BEIPC forums maximizes opportunities for information exchange and advice, while recognizing that the Coeur d'Alene Tribe retains their decision-making authorities.

Photo courtesy of the CDA Tribe

Restoration Partnership

The Restoration Partnership (Partnership) is a collaborative effort comprising the Coeur d'Alene Basin Natural Resource Trustees which are the U.S. Department of the Interior, represented by the U.S. Fish and Wildlife Service (USFWS) and Bureau of Land Management (BLM); the Coeur d'Alene Tribe (Tribe); the U.S. Department of Agriculture, represented by the U.S. Forest Service (USFS); and the State of Idaho, represented by the Idaho Department of Fish and Game (IDFG) and Idaho Department of Environmental Quality (DEQ). The Partnership's primary mission is to implement a restoration plan to help restore the health, productivity, and diversity of natural resources and their services, injured by the releases of mine waste contamination in the Coeur d'Alene Basin for present and future generations. This includes compensation for lost human and cultural use services of those resources by developing and implementing projects under the framework of a Restoration Plan for the Coeur d'Alene Basin. The following Partnership activities occurred throughout federal fiscal year 2025 (FY25):

- The Partnership continued support for ongoing operations and maintenance by USFWS, Ducks Unlimited (D.U.), and private landowners for wetlands at the Schlepp Agriculture to Wetlands Conversion Project. The construction and implementation of this restoration project has been completed and Operations and Maintenance (O&M) planning is underway. For more information visit: https://www.restorationpartnership.org/projects/schlepp.html

- The Trustees coordinated quarterly reporting and site visits with the Project Sponsors and Project Leads as appropriate throughout FY25.

Implementation of the following projects continued in 2025 and the expenditures for each are noted with a brief narrative of work that was completed.

Wetland and stream enhancement at Cougar Bay on Coeur d'Alene Lake (BLM and USFWS sponsors)Funds Originally Allocated in 2018 and 2019 on Cougar and Johnson parcel jointly: $407,000.

- Amount Expended in FY25: $1,491.00
- FY25 Activities: 1) Noxious weed treatments targeting Canada thistle, common tansy, spotted knapweed and absinthe wormwood were conducted in May and June, 2) Additional treatments were applied to the reed canary grass on the edges of the floodplain. These treatments were intended to slow the invasion of reed canary grass into the floodplain and streamside areas, and 3) Excavator work was completed in September to repair bank erosion that had occurred around a vehicle stream crossing. The stream crossing was relocated and stabilized for long term use.

Noxious weed treatments (left), Excavator work for erosion control(right).

Guł Hnch'mchinmsh - Native Willow Nursery for Support of Restoration Actions throughout the Restoration Partnership Project Area (Tribe sponsor)

- Funds Originally Allocated in 2018: $205,462
- Amount Expended in FY25: $10,627.00
- FY25 Activities: 1) The Coeur d'Alene Tribal staff provided survey information obtained from previous data on potential harvest opportunities for the Tribe and the Partnership. Once the nursery is in second generation growth and second-generation harvest opportunities the Tribal staff will acquire new available harvest numbers in 2026, 2) Tribal staff provided up-to-date data on willow harvest opportunities, 3) Staff mowed reed canary grass to keep the rows of willows visible and accessible, 4) Allocations of willow harvest were determined and the numbers were shared with other RP sponsored projects and, 5) Coordination of harvest times was ongoing.

uł qhesu'lumkhw (land is good again): Culturally Significant Plants in the Hangman Creek Watershed (Tribe sponsor)

- Funds Originally Allocated in 2018: $187,770
- Amount Expended in FY25: $0.00
- FY25 Activities: 1) The Coeur d'Alene Tribe's Ecology Program hired a horticulturalist to establish a greenhouse and a nursery to support an increase in the availability of Plants of Cultural Significance. The horticulturalist is currently establishing a greenhouse and identifying sources of propagules for specific Plants of Cultural Significance, and the Tribe's Natural Resources Department has access to restoration project sites within the floodplains of the Hangman Watershed that can provide a source of Plants of Cultural Significance, 2) Staff continued to conduct beaver surveys and dam reinforcements as well as installed plant protectors, 3) funds from other sources became available for the trees and shrubs, and it has become clear that the expansion of forbs of Cultural Significance within Hangman will require a long-term process that can only be established in partnership with a nursery effort. For instance, the dispersal of seeds on meadows suitable for camas (*Camasia quamash*), and 4) new channel development along Hangman Creek was conducted outside of RP funding but this work will reconnect Hangman Creek to its floodplain and re-hydrate the floodplain to increase native fish, wildlife and plant diversity in the Hangman Valley Bottom. In addition, scoping and planning continue to line up projects for restoration in Hangman for the coming decade(s).
- Partnerships with Bonneville Power Administration, AVISTA, and the USFS continue to be great efforts on this project.

Coeur d'Alene Lake Monitoring and Modeling (Tribe sponsor)

- Funds Originally Allocated in 2018: $268,668 and FY24: $75,000
- Amount Expended in FY25: $35,934
- FY25 Activities: 1) Collected and analyzed water quality samples from 4 sites over an eight month period as other Tribal budgets were used for the other sampling events, 2) Continued data and trend analysis and writing the synthesis report for Coeur d'Alene Lake, and 3) Tribal staff worked with EPA RPM's on building a Lake database for the Bunker Hill Data Management Plan under the Basin Environmental Monitoring Program (BEMP).

Wetlands restoration planning at Gray's Meadow (IDFG sponsor)

- Funds Originally Allocated in FY18, $250,000 and FY22, $5.25 M (remedial match provided by the Work Trust)
- Amount Expended in FY25: $1,500,485.00
- FY25 Activities: 1) Construction was ongoing with habitat shaping and revegetation which advanced rapidly toward completion. The project transitioned from large-scale excavation and embankment work in early August to final grading, seeding, and punch-list closeout by mid-October, 2) Water Management and Dust Control: Dust-control operations to support excavation and construction access used ~6.24 million gallons of water. Dust suppression was an ongoing effort during construction due to dry site conditions, 3) A number of soil types were excavated and hauled from Lambs Peak and Cave Lake borrow areas to

construct islands, embankments, and other habitat features. They handled a total of 108,378 BCY and all materials have been placed, 4) Weed Management: Noxious weed and reed canary grass control continued. IDFG staff sprayed areas that were missed, unresponsive to treatment, or avoided due to nesting birds to supplement the initial spring herbicide treatment, 5) Cultural and Biological Compliance: Final bird surveys were conducted to guide excavation and spraying operations early in the quarter. No additional surveys were conducted, while Cultural Resource Services provided ongoing archaeological monitoring in areas of new soil disturbance, 6) Seed-bed preparation involved the cultivator, drill, and drone depending on site roughness and vegetation density. Drill seeding was completed first in the Lamb Peak West & Central area, while a drone was used to broadcast rough or heavily vegetated areas in the other Zones, and 7) Project partners held weekly construction meetings to discuss project progress and issues until project completion and final walkthrough. With construction finished, partner collaboration will be limited to operation and maintenance issues. The Coeur d'Alene Trust is committed to project maintenance until 2030.

Gray's Meadow looking west

Gene Day Pond Fishing Access (IDFG sponsor)

- Funds Originally Allocated in 2018: $25,000
- Amount Expended in FY25: $9,304.78
- FY25 Activities: IDFG placed 124 tons of 3-inch–minus material and top-dressed it with 150 tons of ⅛-inch–minus gravel to raise and repair the entire road and parking area. The pad location was also built up using the same material to address drainage issues. After the base was completed, the concrete form was built, and the rebar was tied in place. Five eco-blocks were installed as a backstop behind the form. The backstop serves several purposes: providing a safety buffer from the interstate, stabilizing the hillside to prevent soil from washing onto the pad during wet seasons, and discouraging off-road vehicles from damaging the slope. The concrete pours will be revisited in 2026 during warmer weather.

Conservation Easement, North Fork Coeur d'Alene River (IDFG sponsor)

- Funds Originally Allocated in 2021: $600,000
- Amount Expended in FY25: $0
- FY25 Activities: 1) Inland NW Land Conservancy (INLC) is the new partner on this project and a letter of intent was drafted and presented to the landowner moving the Conservation Easement (C.E.) development further, 2) AVISTA has and will continue to be a partner on this project, and 3) This C.E. will provide permanent protection of the natural floodplain communities and cold water hyporheic flow.

Conservation of Agricultural to Wetlands Conversion Properties within Canyon Marsh (USFWS sponsor with INLC)

- Funds Originally Allocated in 2018 $801,480 and in 2019 $372,400
- Amount Expended in FY25: $0
- FY25 Activities: 1) USFWS staff continued to coordinate the development of the Scope of Work for the site with the collection of topographic, hydrologic, and soil agronomic data, and 2) INLC resource reports for all three easements provided information on the baseline conditions of the properties prior to when remedial and restoration actions will occur that may be useful for future condition comparisons.

Conservation of Agricultural to Wetlands Conversion Property Gleason's Marsh (USFWS sponsor with INLC)

- Funds Originally Allocated in 2018: $656,140
- Amount Expended in FY25: $0
- FY25 Activities: 1) USFWS worked with EPA on remedial investigations with remediation planned for 2026 and, 2) An interdisciplinary team was established for this project moving forward.

Lake Creek Watershed Restoration (CDA Tribe sponsor)

- Funds Originally Allocated in 2021: $615,951
- Amount Expended in FY25: $10,325
- FY25 Activities: 1) Tribal staff treated areas within the floodplain that were disturbed during late fall 2024 construction and were revegetated with native plants within the broader, active valley bottom to increase species and functional diversity during several timeframes, 2) Tribal staff worked with the Worley Highway District (WHD) to replace aging, undersized culverts to improve fish passage and connectivity at East Fork Bozard Creek and the West Fork Lake Creek and Upper Lake Creek at Burton Road, 3) Newly designed culverts were installed and a new stream bed was created by importing gravel, 4) Former stream crossings were restored that resulted in increased habitat complexity for native west slope cutthroat trout, improved channel stability, enhanced sediment sorting (specifically stream bed gravel aggradation), and reduced stream bank erosion.

East Fork Bozard Creek culverts before (left panel) and after (right panel) construction

West Fork Lake Creek culverts before (left panel) and after (right panel) construction.

Dormant willows planted on WF Lake Creek, April 2025.

Prichard Creek Phase I: Conservation Easement and Restoration Planning (IDEQ sponsor with Idaho Forest Group and Trout Unlimited)

- Funds Originally Allocated in 2021: $3,808,450
- Amount Expended in FY25: $64,345
- FY25 Activities: 1) Phase 2 Design Contractor hired, 2) Draft Risk Assessment was initiated but additional field work will need to occur first depending on weather conditions, 3) Monitoring Phase I will be completed in first quarter of FY26, 4) Communication with project partners was ongoing, and 5) A field trip was conducted in September 2025 with project partners of which was captured in the Spokesman Review in this story: https://www.spokesman.com/stories/2025/may/30/creek-repair-north-idaho-conservationists-work-to-/

Upper Little North Fork Coeur d'Alene River (USFS sponsor)

- Funds Originally Allocated in FY23: $400,000
- Amount Expended in FY25: $49,700
- FY25 Activities:1) The bridge design work for Forest Road 1532 reached the 95% review stage but the bridge design will be deferred until additional funds become available to replace the Collaborative Aquatic Landscape Restoration (CALR) funds that were pulled back during the federal government closure, 2) In-house design work was completed for the placement of large woody debris in the meadow and Little North Fork Coeur d'Alene River for riparian restoration and stream habitat improvement, 3) Approval came from USDA to establish an agreement with Trout Unlimited (TU) to administer the contracts to place large woody debris for fish habitat improvement, floodplain stability, micro-site

planting, and the reshaping of the floodplain, and 4) The project has been through the advertising period, but the contractor selection period will not be completed until early calendar year 2026 due to the delay created by the pause on grants and agreements and furlough, the project is now planned for implementation in the summer of 2026.

Upper St. Joe River Bull Trout Habitat Restoration (USFS sponsor)

- Funds Originally Allocated in FY23: $8,000,000
- Amount Expended in FY25: $50,574.41
- FY25 Activities: 1) TU was secured as a partner for the restoration and habitat improvement of bull trout and west slope cutthroat trout habitat in Red Ives Creek, 2) TU completed a contract to place approximately 180 logs in Red Ives Creek up stream of previous log placement efforts, 3) Survey and design work awarded to TD&H Engineering for replacing the undersized bridge that spans Red Ives Creek on FSR 218 and decommissioning 0.1 miles of road and removing the deteriorating bridge on FSR 320 has reached the 95% complete milestone. The NEPA process was delayed due to loss of personnel and analysis continues with a tentative completion date by the end of FY26, 4) Stream survey work and wood unit reconnaissance continues and is ongoing to prioritize sections for restoration and to review potential units for large woody debris supply needs for restoration work, and 5) The replacement of the bridge on FSR 218 would occur on the same footprint as the current road and bridge. The Forest Service received concurrence from SHPO and Coeur d'Alene Tribe Historic Preservation Officer (THPO) for the geotechnical testing. TD&H was able to complete design work up to the 95% level allowing analysis for environmental compliance documentation to be completed in the target year of 2026.
- This is a large project area with a short operation period due to its backcountry nature. Small individual projects are planned to be completed over multiple years to maintain manageability and assess goals and objectives.

Beaver Creek Watershed Enhancement (USFS sponsor)

- Funds Originally Allocated in FY23: $2,430,000
- Amount Expended in FY25: $0
- FY25 Activities: 1) In the summer of 2025, road drainage improvements on roads 271, 1586, 424 (between 271 and 1586 only), and 429; and effectively closed road 429B to place into long-term storage. This work resulted in drainage improvements to 17.5 miles of roads through construction of 42 new rolling dips, reconstruction of 19 existing rolling dips, and reconditioning of 4.5 miles of road 271, and storing 0.7 miles of road 429B. Additionally, 12 acres of the Prospect Gulch riparian area were planted with 600 western red cedar and tubed for protection from browsing, 2) Originally planned for 2025 was the issuance of a task order for survey and design work on Dudley Creek and Carpenter Gulch to replace existing crossings with Aquatic Organism Passage (AOP) structures but has been delayed. TU continues the search for funding to have the AOP's installed once the project moves forward, 3) A planting plan for Carpenter Gulch, Prospect Gulch, and Hutchins Gulch which were burned over in the Character Complex Fire, is being developed and the planting will likely occur in the fall 2026, 4) the USFS was able to award and complete 4.2 miles of road

decommissioning, and 5) Initial meetings have been held with Shoshone County officials to inform and reach out for involvement in the project with favorable interest. Opportunities may arise for partnering as the project advances.

Enhancing design to restore fish passage and ecosystem function in Miesen Creek (IDFG sponsor)

- Funds Originally Allocated in FY23: $60,000
- Amount Expended in FY25: $107,000
- FY25 Activities: 1) Landowner approval was received on the revised 60% designs and the revised designs were sent to Benewah County for review; permit scheduling will occur upon approval of 60% designs from the County, and 2) Funding was secured this year for completing designs on the private land portion of the project and implementation on all portions of the project. Engineering designs for the culvert replacement and stream restoration have been progressing towards completion in early 2026.

Benewah Creek *'eɬtumish* Stream and Wetland Restoration (Tribe sponsor)

- Funds Originally Allocated in FY23: $455,316
- Amount Expended in FY25: $210,850
- FY25 Activities: 1) Significant progress was made over the past year to complete most of the work associated with the largest of two restoration projects in the Benewah Creek watershed funded through the Restoration Partnership. The following description details project accomplishments for restoration at the site designated as Benewah Creek RM10.5, 2) A Hydrologic Engineering Center-River Analysis System (HEC-RAS) model was developed for the project site through multiple iterations between December 2024 - February 2025 to inform the design. Two versions of the model were developed to depict existing and desired future conditions that illustrate the area of active floodplain within riverscape at the 5-year flood, and 3) A drone flight was conducted of the project area in March 2025, coinciding with high flows, to help calibrate the hydraulic model. Additional surveys were conducted in Spring 2025 to collect cross section and stream profile data to generate refined engineer's estimates of materials quantities and costs for the project. The 60% restoration design was completed and a CWA Section 404 permit application for the project was submitted in early March. A planting plan was developed as part of the design process to implement following the conclusion of construction work beginning in Fall 2025.
- The following construction elements were initiated in August 2025; 1) Floodplain grading, 2) Wetland restoration and rebuild of streambanks, 3) Construction of in-channel structures, 4) Placement of large wood, and 5) Planting of floodplain wetlands.

Construction of an instream structure designed to emulate the flow obstruction effects of natural wood jams and beaver dams

Lake Creek Corridor Protection and Enhancement (Tribe sponsor)

- Funds Originally Allocated in FY23: $83,750
- Amount Expended in FY25: $24,500
- FY25 Activities: 1) INLC and the Tribe worked through the draft C.E. and INLC made modifications/ clarifications. The Baseline Report and Forest Management Plan will be forthcoming during the first quarter of FY26 of which will be exhibits to the C.E., 2) The landowner had the land appraised as well as a professional land survey, and 3) It is anticipated that this C.E. will be lodged with Kootenai County in the first quarter of FY26 which will close out this restoration project.

Big Creek Fish Passage Barrier Removal (Tribe sponsor)

- Funds Originally Allocated in FY23: $214,400
- Amount Expended in FY25: $0
- FY25 Activities: 1) HMH Engineering worked through refining the specifications list for removal quantities of concrete, rebar, etc. This refinement will also need to address the additional dry wells that are planned for installation that are outside of the Restoration Partnership Scope of Work that was awarded funding, 2) BLM received the ROW application from Sunshine Mine, 3) The ACOE 404 permit was approved and received and HMH sent it to Shoshone County Public Works to complete the Floodplain approval process, and 4) HMH, with the support from the USFS and CDA Tribe, will conduct the oversight of the construction which is slated to occur in the first quarter of FY26 and reported upon in the next BEIPC FY26 Accomplishment Report.

Big Creek fish passage barrier

Assessing Fish Passage at Stream Crossings in the Coeur d'Alene Basin (IDFG sponsor)

- Funds Originally Allocated in FY23: $50,000 + $43,000
- Amount Expended in FY25: $42,003
- FY25 Activities: 1) The TU field crew completed surveys on 408 stream crossings and were submitted to the national barrier database. An additional 135 locations were documented as bridges providing adequate passage, 140 sites did not contain a crossing at the mapped coordinates, and 192 sites were inaccessible due to lack of landowner permission, impassable routes, or decommissioned roads, 2) All evaluated sites will undergo final QA/QC review with TU, and 3) In addition to barrier assessments, the crew collected water temperature and instantaneous flow measurements at surveyed locations. These data will provide useful discharge estimates in un-gaged streams, supporting future restoration planning, hydrologic evaluations, and other decision-making needs where water availability is an important consideration.

The paleolimnology of Coeur d'Alene Lake from pre-disturbance to mining impacts and present day was awarded (CDA Tribe sponsor)

- Funds Originally Allocated in FY25: $100,000
- Amount Expended in FY25: $0
- FY25 Activities: 1) The funds for this project were just released in December 2025 therefore there is no work to report in this FY25 BEIPC report and, 2) AVISTA is providing matching funds for this work.

Total RP Funds Expended in FY25: $2,117,139.19

The full annual reports can be found on the website at www.restorationpartnership.org.

In FY25, the RP continued to update their Long Term Operation and Management plans for restoration projects as well as a Financial Strategic Plan. The Trustees plan to go out for future project solicitation in FY26-FY27 and the RP will present to the BEIPC during project solicitation.

Challenges Ahead

A great deal of work was accomplished across the Upper and Lower Basin in 2025. Cleanup and restoration efforts continued to focus on reducing human health risks associated with contaminated residential and commercial properties, while also advancing ecological remediation and water quality improvements. The CDA Trust carried out extensive work in the Canyon Creek drainage, as well as in the Lower Basin, addressing both ecological remedies and associated human health concerns. Human health–related projects remain a priority, with increasing emphasis on cleanup of fish and wildlife habitat areas and long-term water quality protection. The Restoration Partnership also continued to advance implementation of natural resource restoration actions throughout the Basin.

In the Lower Basin, design work progressed for the recently sited Dredge Road Waste Consolidation Area, which will play a critical role in supporting future remedial actions by providing disposal capacity for contaminated materials. This allowed work to continue on the design of the Dudley Reach cap and dredge project, a key effort aimed at reducing exposure risks and limiting the downstream transport of contaminated sediments within the Coeur d'Alene River system.

Because the Coeur d'Alene River system contains millions of tons of contaminated sediments, which are mobilized and transported downstream during annual high-flow events, recontamination remains a significant concern for Lower Basin projects. Assessment of recontamination resulting from flooding events, including those occurring in December 2025, will be essential to informing project design, timing, and long-term effectiveness.

Major challenges ahead include:

- Development of any additional waste repositories and consolidation areas needed for disposal of remedial action and Institutional Controls Program (ICP) wastes.
- Continued implementation of the Upper Basin RODA and the OU-3 Record of Decision for the Lower Basin.
- Identification and development of solutions to major flooding issues in Lower Pine Creek, the South Fork of the Coeur d'Alene River, and the main stem of the Coeur d'Alene River.
- Continued coordination with the Coeur d'Alene Tribe and the State of Idaho to address Coeur d'Alene Lake management issues.

The ASARCO bankruptcy settlement continues to be the primary source of funding for environmental remediation actions in the Basin. Careful financial management is necessary to ensure that implementation of the Upper Basin RODA, the Lower Basin OU-3 ROD, and any future amendments can proceed as planned. Additional funding will be required to support remedial actions in the Box, as ASARCO settlement funds are not available for that area. Securing sustainable, long-term funding to advance cleanup efforts remains a significant challenge moving forward.