

California Regional Water Quality Control Board  
North Coast Region

DRAFT TIME SCHEDULE ORDER NO. R1-2026-00XX

REQUIRING

Justin Baldwin and Mia Baldwin as Trustees of the Baldwin J and M Trust,  
Humboldt Spirit Inc., and Sprowl Creek LLC

TO COMPLY WITH REQUIREMENTS PRESCRIBED IN CLEANUP AND ABATEMENT  
AND INVESTIGATIVE ORDER NO. R1-2023-0042

REGARDING

HUMBOLDT COUNTY ASSESSOR PARCEL NUMBER 222-071-030-000

This time schedule order (Order) is issued to Justin and Mia Baldwin (the Baldwins), Humboldt Spirit Inc. and Sprowl Creek LLC (the DuPont Entities) (hereinafter all collectively referred to as the Dischargers) based on provisions of Water Code section 13308, which authorizes the California Regional Water Quality Control Board, North Coast Region (hereinafter, the North Coast Water Board or Board) to issue a time schedule order (Order) when the North Coast Water Board determines there is a threatened or continuing violation of a cleanup and abatement order issued pursuant to Water Code section 13304 and/or a Water Code section 13267 investigative order. Issuance of this Order is consistent with the Cannabis Enforcement Strategy that was presented to the North Coast Water Board at the December 5, 2024, Board meeting, which proposed the use of time schedule orders in certain circumstances to increase compliance rates with outstanding cleanup and abatement orders within the cannabis program.

The North Coast Water Board finds, with respect to the Dischargers' acts, or failure to act, the following:

1. The Baldwins purchased approximately 108 acres, identified as Humboldt County Assessor Parcel Number 222-071-030-000 (the Property) through deed document number 2000-5817, which was recorded with the Humboldt County Recorder's office on March 1, 2000.
2. Between 2000-2017, the Baldwins placed the Property into the Baldwin J and M Trust. The Baldwins owned the Property as trustees of the Baldwin J and M Trust.
3. On January 21, 2015 North Coast Water Board staff (Staff) inspected the Property and observed discharges and threatened discharges of waste to tributaries to receiving waters on the Property. On June 23, 2015, Staff transmitted its report of the January 21, 2015 inspection to the Baldwins.

4. On February 15, 2016, Justin Baldwin submitted a Notice of Intent, identifying himself as the cultivator, seeking enrollment under the North Coast Water Board Order No. R1-2015-0023, *Waiver of Waste Discharge Requirements and General Water Quality Certification for Discharges of Waste Resulting from Cannabis Cultivation and Associated Activities or Operations with Similar Environmental Effects In the North Coast Region* (Regional Cannabis Order<sup>1</sup>).
5. On May 12, 2017, Natural Resources Management Corporation submitted the Regional Cannabis Order enrollment fee to the North Coast Water Board on behalf of Justin Baldwin.
6. On December 7, 2018, Justin Baldwin identified himself as the cultivator while transferring enrollment of the Property to the State Water Resources Control Board, Order WQ 2019-0001-DWQ, *General Waste Discharge Requirements and Waiver of Waste Discharge Requirements for Discharges of Waste Associated with Cannabis Cultivation Activities* (Cannabis General Order<sup>2</sup>).
7. On May 6, 2019, Staff re-inspected the Property and provided recommendations to the Baldwins to correct site conditions that threatened to discharge pollutants to receiving waters.
8. On March 10, 2020, Justin Baldwin submitted a request to terminate enrollment in the Cannabis General Order, effectively terminating the enrollment.
9. Staff inspected the Property again on November 20, 2020, and issued a Notice of Violation on February 12, 2021, which included a report of the inspection and recommendations to abate threatened discharges at the Property.
10. On July 13, 2021, the North Coast Water Board provided a draft of Order No. R1-2021-0056 (Cleanup and Abatement Order) to the Baldwins, who shared the draft Cleanup and Abatement Order with the DuPont Entities, with whom they were discussing potential sale of the Property. During the purchase of the Property, the buyers (the DuPont Entities) retained ETA Humboldt and commented on the draft Cleanup and Abatement Order.

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<sup>1</sup> The [Regional Cannabis Order](https://www.waterboards.ca.gov/northcoast/board_decisions/adopted_orders/pdf/2015/15_0023_Cannabis_Order.pdf) can be found online at:  
([https://www.waterboards.ca.gov/northcoast/board\\_decisions/adopted\\_orders/pdf/2015/15\\_0023\\_Cannabis\\_Order.pdf](https://www.waterboards.ca.gov/northcoast/board_decisions/adopted_orders/pdf/2015/15_0023_Cannabis_Order.pdf))

<sup>2</sup> The [Cannabis General Order](https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2019/wqo2019_0001_dwq.pdf) can be found online at:  
([https://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/water\\_quality/2019/wqo2019\\_0001\\_dwq.pdf](https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2019/wqo2019_0001_dwq.pdf))

11. On September 27, 2021, the DuPont Entities' attorney submitted a proposed timeline to complete the scope of work in the draft Cleanup and Abatement Order.
12. On October 4, 2021, Staff met with the DuPont Entities' consultants to discuss the scope of work and timeline in the Draft Cleanup and Abatement Order. Staff supported the DuPont Entities' proposed timeline and summarized the discussions in Staff's response to comments letter transmitted to the Dischargers on November 4, 2021.
13. The DuPont Entities purchased the Property through a grant deed recorded with the Humboldt County Registrar's office on November 1, 2021. Humboldt County records available in Light Box Land Vision show that The Baldwin Schemmerling Revocable Trust acted as the private lender for the sale of the Property.
14. The North Coast Water Board issued the Cleanup and Abatement Order on November 4, 2021. The Cleanup and Abatement Order incorporated the DuPont Entities' proposed timeline and named the Baldwins as responsible parties. In return for incorporating the proposed timeline, the DuPont Entities voluntarily agreed to implement the conditions of the final Cleanup and Abatement Order without being named as responsible parties.
15. On March 15, 2022, ETA Humboldt, on behalf of the DuPont Entities, submitted a Cleanup, Restoration, and Monitoring Plan (CRMP) for review and approval by the North Coast Water Board. Staff requested more information on April 18, 2022, and on May 4, 2022, Timberland Resource Consultants provided the requested information on behalf of the DuPont Entities.
16. On July 5, 2022, the North Coast Water Board issued a Notice of Applicability<sup>3</sup> for Coverage under the State Water Resources Control Board Cannabis Cultivation Policy General Water Quality Certification, and Order No. WQ 2019-0001-DWQ General Waste Discharge Requirements to the DuPont Entities authorizing implementation of the instream work required by the Cleanup and Abatement Order.
17. On July 19, 2022, the North Coast Water Board approved the CRMP.
18. On October 13, 2022, ETA Humboldt submitted a progress report on behalf of the DuPont Entities which documented work not included in the CRMP and the removal of waste potting soils and revegetation of native grasses at WQ15, but not the work

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<sup>3</sup> The [Notice of Applicability](https://www.waterboards.ca.gov/northcoast/board_decisions/water_quality_certification/pdf/2022/Humboldt%20Spirit%20Inc_1B22028CHUM_WQC_NOA.pdf) can be found online at:  
([https://www.waterboards.ca.gov/northcoast/board\\_decisions/water\\_quality\\_certification/pdf/2022/Humboldt%20Spirit%20Inc\\_1B22028CHUM\\_WQC\\_NOA.pdf](https://www.waterboards.ca.gov/northcoast/board_decisions/water_quality_certification/pdf/2022/Humboldt%20Spirit%20Inc_1B22028CHUM_WQC_NOA.pdf))

in Project Area No. 1 (WQ1, WQ2, WQ9, WQ10, WQ11 and WQ16) that is required by the Order to be completed by October 15, 2022.

19. On October 21, 2022, ETA Humboldt, on behalf of the DuPont Entities, submitted an extension request for the Cleanup and Abatement Order deadlines proposing a new project timeline to delay implementing the bulk of the required work to 2024 and 2025 instead of completing significant portions of the work in 2022 and 2023.
20. On April 18, 2023, Staff responded to the Extension Request by providing a draft Cleanup and Abatement Order with extended deadlines and adding the DuPont Entities as responsible parties.
21. On May 26, 2023, the North Coast Water Board issued Order R1-2023-0042 amending Cleanup and Abatement Order No. R1-2021-0056 by naming the DuPont Entities as responsible parties and extending the deadlines for completing work in Project Area No. 1 to October 15, 2023, per the DuPont Entities' extension request. Paragraphs 2-14 of the Cleanup and Abatement Order contain the factual findings that detail the history of the Property. Order R1-2023-0042 is incorporated herein by reference.
22. This Order is to address the Dischargers' continuing violation for failure to comply with Required Action No. 2 and Required Action No. 3 of Cleanup and Abatement Order R1-2023-0042<sup>4</sup>.
23. Required Action No.2 of the Cleanup and Abatement Order requires the Dischargers to have fully implemented and completed the CRMP for Project Area No.1 and Project Area No. 2 by October 15, 2023, Project Area No. 3 by October 15, 2024, and Project Area No. 4 by October 15, 2025, respectively.
24. Required Action No. 3 of the Cleanup and Abatement Order requires the Dischargers to have submitted a Completion Report for the CRMP by December 15, 2025, that includes accurate depictions, documentation, and as-built designs of all completed restoration construction and/or abatement measures included in the CRMP to restore the unnamed tributaries to the South Fork Eel River and pre- and post-construction photographs taken at each photo point, as depicted on site maps/figures.
25. On October 25, 2023, ETA Humboldt submitted a progress report, which documented the completion work at Site 2, Site 32/WQ11, Site 34, and Site 36, but

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<sup>4</sup> Dischargers are complying with Required Action 1 of the Cleanup and Abatement Order and at this time there is no threatened violation of Required Action 4 as the Dischargers can comply with its requirements as detailed in the Cleanup and Abatement Order.

not the work in Project Area Nos. 1 and 2 (WQ1, WQ2, WQ9, WQ10, WQ16, WQ17, WQ18, WQ20, WQ21 and WQ22) that is required by the Order to be completed by October 15, 2023. The progress report also included a request to extend the deadlines in the Cleanup and Abatement Order.

26. On December 6, 2023, the North Coast Water Board denied the request for modification given the timing of the request and justification provided.
27. On November 18, 2024, ETA Humboldt submitted a progress report which documented the work at Site 01/WQ2, Site 03/WQ3, Site 07/WQ7, Site 11/WQ9, Site19/WQ22, Site 12, Site 13, Site14/WQ10, Site 16 and Site 17/WQ21. The progress report did not document completion of the work in Project Area Nos. 1, 2 and 3 (WQ1, WQ4, WQ5, WQ6, WQ8, WQ16, WQ17, WQ18 and WQ20) that is required by the Order to be completed by October 15, 2024. The progress report recognizes that the work at Site 01/WQ2, Site 07/WQ7, Site 11/WQ9 and Site19/WQ22 are incomplete. Staff later determined that the work at Site 17/WQ21 was incomplete.
28. On September 18, 2025, one month prior to the deadline, ETA submitted another request to extend the deadline for Required Action No. 2 by two more years until 2027.
29. On December 17, 2025, ETA Humboldt submitted a progress report that documented work at Site 15 and Site 31/WQ15. The progress report did not document completion of all of the work required by the Cleanup Order by October 15, 2025 (See Table 2 in Attachment A).
30. On March 11, 2026, Staff re-inspected the Property at the invitation of the DuPont Entities. Staff's purpose for the inspection was to evaluate what work had been completed as part of the approved CRMP. During the inspection, Staff confirmed that the CRMP had not been fully implemented as is required by Required Action No. 2 of the Cleanup and Abatement Order to have been completed by October 15, 2025. As the CRMP was never fully implemented, the Dischargers failed to comply with Required Action No. 2 (completion of the CRMP) and Required Action No.3<sup>5</sup> (submittal of a Completion Report for the CRMP) of the Cleanup and Abatement Order.

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<sup>5</sup> The DuPont Entities have submitted numerous progress reports to Staff for the work that was implemented pursuant to the CRMP. However, these reports do not satisfy the requirements of Required Action No. 3 because the reports do not include documentation of all the completed restoration prescribed in the approved CRMP.

31. On March 20, 2026, The North Coast Water Board Executive Officer denied the DuPont Entities' September 18, 2025, request for extension.
32. Pursuant to Water Code section 13308, subdivision (a), when the North Coast Water Board determines there is a threatened or continuing violation of a Cleanup and Abatement Order, the North Coast Water Board may issue an order establishing a time schedule and prescribe a civil penalty that shall become due if compliance is not achieved in accordance with that time schedule. Section 13308, subdivision (b), further provides that the amount of the civil penalty shall be based on the amount reasonably necessary to achieve compliance, not to include any amount intended to punish or redress previous violations, and that the civil penalty shall not exceed ten thousand dollars (\$10,000) for each day in which the violation occurs.
33. Based on the Dischargers' failure to comply with Required Action Nos. 2 and 3 of the Cleanup and Abatement Order by the required deadlines, issuance of a time schedule order, pursuant to Water Code section 13308, is appropriate. Therefore, this Order establishes a time schedule consisting of new deadlines and potential civil penalties for Required Action Nos. 2 and 3 based on the Dischargers' ongoing violations of the Cleanup and Abatement Order, in accordance with Water Code section 13308.
34. If the Dischargers fail to comply with the requirements of this Order, a complaint for administrative civil liability may be issued by the North Coast Water Board. The North Coast Water Board reserves its right to take any enforcement actions authorized by law, including, but not limited to, enforcement for the underlying discharges of waste in violation of the North Coast Water Board's requirements and/or the Water Code.
35. The adoption of this Order is an enforcement action to protect the environment and is therefore exempt from the provisions of the California Environmental Quality Act (Public Resources Code section 21000 et seq.) pursuant to Title 14, California Code of Regulations, sections 15308 and 15321, subdivision (a)(2).
36. Any person aggrieved by this action of the North Coast Water Board may petition the State Water Board to review the action in accordance with Water Code section 13320 and California Code of Regulations, title 23, section 2050 et seq. The State Water Board must receive the petition by 5:00 p.m., 30 days after adoption of this order, except that if the thirtieth day following the action falls on a Saturday,

Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day.<sup>6</sup>

**THEREFORE, IT IS HEREBY ORDERED**, pursuant to Water Code section 13308, that the Dischargers shall comply with, and be subject to, the following:

1. **By October 15, 2027**, The Dischargers shall complete implementation of the approved CRMP.
  - a. **Prescribed civil penalty:** The cost associated with implementation of the CRMP is estimated to be \$105,993. Staff based this estimate on a cost estimate that the DuPont Entities provided to grant reviewers from the Friends of the Eel River as part of an application for grant funding to comply with a portion of the CRMP; extrapolated to the full scope of work required by the CRMP; and applied factors associated with inflation from the US Bureau of Labor and Statistic as explained in the attached Cost Estimate (Attachment A).

For each civil penalty in this Order, prescribed under Water Code section 13308, ten percent is added to the estimated cost of compliance to establish the maximum penalty. The additional ten percent is intended to incentivize the Dischargers to complete the required actions by making compliance the less costly option.<sup>7</sup> The additional ten percent is not intended to punish or redress previous violations. The amount reasonably necessary to achieve compliance is, therefore, calculated to be \$116,592, which represents the estimated cost of compliance plus ten percent. If The Dischargers fail to complete implementation of the CRMP by October 15, 2027, the civil penalty shall accrue at a daily rate of \$5,830 per day of violation up to the maximum liability of \$116,592.
2. **Within 60 days of complete implementation of the approved CRMP, but no later than December 14, 2027**, the Dischargers shall submit a CRMP Completion Report for approval by the North Coast Water Board or its delegated officer. To be acceptable for approval, the CRMP Completion Report shall include all elements

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<sup>6</sup> [Copies of the law and regulations applicable to filing petition](https://www.waterboards.ca.gov/public_notices/petitions/water_quality/) may be found on the State Water Board's webpage titled Water Quality Petitions ([https://www.waterboards.ca.gov/public\\_notices/petitions/water\\_quality/](https://www.waterboards.ca.gov/public_notices/petitions/water_quality/)).

<sup>7</sup> Although this Order estimates the cost of compliance for each action imposed pursuant to the North Coast Water Board's authority under Water Code section 13308, these costs are merely estimates and are not intended to, nor do they, act as a cap on the amount that the Dischargers may need to incur to comply with the required actions.

specified in Required Action No. 3 and the General Requirements and Notices contained in the Cleanup and Abatement Order.

a. **Prescribed civil penalty:** The scope of a Completion Report (i.e., field inspection and report preparation) is comparable to that of preparing a Site Closure Report as described in the 2017 Direct Cost Analysis<sup>8</sup>, which is estimated to cost between \$1,080 and \$4,760 (between \$1,440 and \$6,346 adjusted for inflation<sup>9</sup> between 2017 and 2025). The amount reasonably necessary to achieve compliance is, therefore, calculated to be \$6,980, which is the maximum estimated report cost plus ten percent. If the Dischargers fail to submit a CRMP Completion Report by December 14, 2027, the civil penalty shall accrue at a daily rate of \$349 per day of violation up to the maximum liability of \$6,980.

3. The submittals required above shall be sent by email (preferred) to:

Brian Fuller, Senior Engineering Geologist Specialist  
[Brian.Fuller@waterboards.ca.gov](mailto:Brian.Fuller@waterboards.ca.gov)

Or by mail to:

North Coast Regional Water Quality Control Board  
5550 Skylane Blvd STE A  
Santa Rosa CA 95403-1072

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<sup>8</sup> The State Water Board considered the estimated costs associated with various technical reports regarding site characterization, stabilization, and restoration during the adoption and amendment of the State Water Resources Control Board Cannabis Cultivation Policy Principles and Guidelines for Cannabis Cultivation and General Order. Estimated costs for technical reports were presented in the [State Water Board's 2017 Direct Cost Analysis For the Proposed Cannabis Cultivation Policy \(2017 Direct Cost Analysis\)](#)

([www.waterboards.ca.gov/water\\_issues/programs/cannabis/docs/policy/20171017\\_cannabis\\_cultivation\\_policy\\_cost\\_analysis.pdf](http://www.waterboards.ca.gov/water_issues/programs/cannabis/docs/policy/20171017_cannabis_cultivation_policy_cost_analysis.pdf)). The costs to develop the technical reports required in this Order are anticipated to be comparable to the preparation of reports presented in the 2017 Direct Cost Analysis.

<sup>9</sup> The inflation rates that are referenced in this Order were determined using the US Bureau of Labor and Statistic [Data Tools](#), available at: (<https://data.bls.gov/pdq/SurveyOutputServlet>). Specifically, Consumer Price Indices of 100.000 for December 2017 and 133.311 for December of 2025 were applied.

4. If the Dischargers are unable to perform any of the required actions in compliance with the schedule set forth herein, only due to an act of God, the Dischargers may request, in writing, an extension of the deadline. Any request for extension shall include justification for the delay and must be submitted as soon as the delay is recognized and prior to the deadline for the required action. An extension may only be granted by modification of this Order or by a letter from the North Coast Water Board's delegated officer.

I, Valerie Quinto, Executive Officer, do hereby certify that the foregoing is a full, true, and correct copy of the Order adopted by the North Coast Water Board on August \_\_, 2026.

Valerie Quinto  
Executive Officer



## ATTACHMENT A: COST ESTIMATE FOR REMAINING WORK REQUIRED IN TIME SCHEDULE ORDER NO R1-2026-00XX

The prescribed civil penalty in the Order is based on the cost associated with implementation of the Cleanup, Restoration, and Monitoring Plan (CRMP) which is estimated to be \$105,993. Staff based this estimate on the resources listed below; then extrapolated to the full scope of work required by the CRMP; and applied factors associated with inflation from the US Bureau of Labor and Statistic.

### **Resources for CRMP Cost Estimate:**

- Friends of the Eel River [Grant Application](https://lostcoastoutpost.com/loco-media/loco-media/agendizer/attachment/8427/2.pdf) (https://lostcoastoutpost.com/loco-media/loco-media/agendizer/attachment/8427/2.pdf)
- US Bureau of Labor and Statistic [Data Tools](https://data.bls.gov/pdq/SurveyOutputServlet) (https://data.bls.gov/pdq/SurveyOutputServlet)

The approved CRMP proposes installing or replacing 19 culverts, extending one (1) culvert, decommissioning four (4) culvert crossings, armoring one (1) existing crossing, constructing eight (8) rocked rolling dips (RRDs), and performing maintenance/light work at five (5) sites (Table 1).

The Friends of the Eel River Grant Application includes an estimate on page 160 (Figure 1) from October 2022 (2022 Estimate), to fully implement a significant portion of the CRMP by installing nine (9) RRDs, replacing 17 culverts and extending one (1) culvert. The 2022 Estimate includes a total of \$86,390 in earthwork costs, which covers \$1,000 for straw, \$11,200 for 1/4 riprap, \$6,030 for base rock, \$47,750 for an excavator, \$7,920 for a 10-yard truck, \$9,900 for a skid steer, and \$2,590 for a 10-yard truck and trailer. These costs apply to the 26 work items expected to require earthwork (installing 9 RRDs and replacing 17 culverts). The 2022 Estimate also lists material costs for each culvert separately: \$700 for a 15" culvert, \$800 for an 18" culvert, \$1,100 for a 24" culvert, \$1,400 for a 30" culvert, and \$2,000 for a 36" culvert.

To determine the total cost to implement the CRMP, North Coast Water Board staff (Staff) calculated the average cost of work items requiring earthwork—excluding the standalone culvert cost—by dividing the combined costs associated with earthwork presented in the 2022 Estimate (\$86,390) by the 26 earthwork items, resulting in \$3,323 per earthwork item. Staff then estimated the cost for each CRMP work item in October 2022 by applying the averaged earthwork rate of \$3,323 and adding the standalone material costs. Staff determined that the culvert extension and maintenance/light work sites do not require significant earthwork and, therefore, based those cost estimates on the standalone material costs of \$60 for a band plus \$1,100 for a 24" culvert for the one (1) culvert extension; and a nominal value of \$200 for each of the five (5) maintenance/light work sites (Table 2).

Some work has already been completed, and the cost of work has increased due to inflation. To account for these cost changes over time, Staff used consumer price data collected from the [US Bureau of Labor and Statistic](#)<sup>1</sup> (Table 3) to calculate the costs for each remaining work item for subsequent years (Table 4). The final cost to implement the CRMP in 2026 is \$105,993, which is the original estimated cost minus the cost for the completed work items plus the added cost from inflation (Table 5).

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<sup>1</sup> Consumer Price Data can be found at the [US Bureau of Labor and Statistic](https://data.bls.gov/pdq/SurveyOutputServlet) (<https://data.bls.gov/pdq/SurveyOutputServlet>)

LEWIS LAND  
 DEVELOPMENT INC.  
 751 E Branch RD  
 Garberville Ca 95542  
 ph# 707 -223-3937  
 Lic #1012107

# Estimate

DATE	ESTIMATE #
10/24/2022	118

BILL TO
DILLION DuPONT sprowl cr

ITEM	DESCRIPTION	QTY	RATE	AMOUNT
	remove an install 17 culverts			0,00
	straw	40	25,00	1,000,00
	1/4 to riprap	16	700,00	11,200,00
	15"x20' culverts	3	700,00	2,100,00
	18"x20' culverts	7	800,00	5,600,00
	24"x20' culverts	2	1,100,00	2,200,00
	24" band	1	60,00	60,00
	24"x20' culverts	2	1,100,00	2,200,00
	30"x20"	3	1,400,00	4,200,00
	36"x20' culvert	1	2,000,00	2,000,00
	9 rolling dips			0,00
	base rock	18	335,00	6,030,00
	excavator	191	250,00	47,750,00
	10yd truck	48	165,00	7,920,00
	skidsteer	60	165,00	9,900,00
	10yd truck & trailer	14	185,00	2,590,00
<b>Subtotal</b>				104,750,00
7.25% Tax				
<b>Total</b>				104,750,00

Sproul Creek Road Improvement FOER Submission  
 ETA Humboldt LLC

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Figure 1. Estimate for CRMP work on the Property from page 160 of the Friends of the Eel River Grant Application.

**Table 1: Distribution of sites by Project Areas proposed by the DuPont Entities on September 27, 2021**

<b>Project Area</b>	<b>Sites</b>	<b>Treatment</b>	<b>Status of Work Completion as of March 11, 2026</b>
1	Site 01/WQ2	Multiple (2) DRC	Incomplete
	Site 11/WQ9	24" Culvert Extension	Incomplete
	Site 12	RRD	Completed
	Site 13	18" Culvert	Completed
	Site 14/WQ10	18" DRC	Completed
	Site 15	RRD	Completed
	Site 23/C2/WQ16	30" Culvert	Incomplete
	Site 32/WQ11	Armor outlet	Completed
2	Site 17/C4/WQ21	Decommission crossing	Incomplete
	Site 18	Water bar	Incomplete
	Site 19/C3/C3.1/WQ22	Decommission crossing	Incomplete
	Site 24/WQ17	36" Culvert and RRD	Incomplete
	Site 25/WQ20	RRD	Incomplete
3	Site 02	RRD	Completed
	Site 03/WQ3	18" Culvert	Completed
	Site 04/WQ4	18" Culvert	Incomplete
	Site 05/WQ5	18" Culvert	Incomplete
	Site 06/WQ6	24" Culvert	Incomplete
	Site 07/WQ7	30" Culvert	Incomplete
	Site 08/WQ8	18" Culvert	Incomplete
4	WQ17	36" Culvert and RRD	Incomplete
	Site 26/WQ18	30" Culvert	Incomplete
	Site 27	Maintenance	Incomplete
	Site 37/WQ13	Decommission crossing	Incomplete
	Site 38/WQ14	Decommission crossing	Incomplete
Not identified	Site 09	15" DRC	Incomplete
	Site 10	15" DRC	Incomplete
	Site 16	Water bar	Completed
	Site 20	Remove bladder	Completed
	Site 22/ST2	Remove liner	Completed
	Site 25	RRD	Incomplete
	Site 28/WQ19	18" DRC	Incomplete
	Site 29/WQ20	18" DRC and RRD	Incomplete
	Site 30	RRD	Incomplete
	Site 31/WQ15,	Relocate soil	Completed

<b>Project Area</b>	<b>Sites</b>	<b>Treatment</b>	<b>Status of Work Completion as of March 11, 2026</b>
	Site 33	RRD	Incomplete
	Site 34	RRD	Completed
	Site 35/C1	18" Culvert	Incomplete
	Site 36	15" DRC	Completed

**Table 2: List of work sites from approved CRMP with completion date/status and estimated costs as of October 2022**

<b>Site</b>	<b>CRMP Deadline</b>	<b>Completion Date/Status</b>	<b>Treatment</b>	<b>October 2022 Cost</b>
Site 01/WQ 2	10/15/2023	Incomplete	Multiple (2) DRC	\$8,046
Site 02	10/15/2024	10/15/2023	RRD	\$3,323
Site 03/WQ3	10/15/2024	10/15/2024	18" Culvert	\$4,123
Site 04/WQ4	10/15/2024	Incomplete	18" Culvert	\$4,123
Site 05/WQ5	10/15/2024	Incomplete	18" Culvert	\$4,123
Site 06/WQ6	10/15/2024	Incomplete	24" Culvert	\$4,423
Site 07/WQ7	10/15/2024	Incomplete	30" Culvert	\$4,723
Site 08/WQ8	10/15/2024	Incomplete	18" Culvert	\$4,123
Site 09	10/15/2025	Incomplete	15" DRC	\$4,023
Site 10	10/15/2025	Incomplete	15" DRC	\$4,023
Site 11/WQ9	10/15/2023	Incomplete	20' 24" Extension	\$1,160
Site 12	10/15/2023	10/15/2024	RRD	\$3,323
Site 13	10/15/2023	10/15/2024	18" Culvert	\$4,123
Site 14/WQ10	10/15/2023	10/15/2024	18" DRC	\$4,123
Site 15	10/15/2023	10/15/2025	RRD	\$3,323
Site 16	10/15/2025	10/15/2024	Water bar	\$200
Site17/C4/WQ21	10/15/2023	Incomplete	Decommission crossing	\$3,323
Site 18	10/15/2023	Incomplete	Water bar	\$200

<b>Site</b>	<b>CRMP Deadline</b>	<b>Completion Date/Status</b>	<b>Treatment</b>	<b>October 2022 Cost</b>
Site19/C3/C3.1/WQ22	10/15/2023	Incomplete	Decommission crossing	\$3,323
Site 20	10/15/2025	Complete	Remove bladder	\$0
Site 22/ST2	10/15/2025	Complete	Remove liner	\$0
Site 23/C2/WQ16	10/15/2023	Incomplete	30" Culvert	\$4,723
Site 24/WQ17	10/15/2023	Incomplete	36" Culvert and RRD	\$8,646
Site 25	10/15/2023	Incomplete	RRD	\$3,323
Site 26/WQ18	10/15/2023	Incomplete	30" Culvert	\$4,723
Site 27	10/15/2025	Incomplete	Maintenance	\$200
Site 28/WQ19	10/15/2025	Incomplete	18" DRC	\$4,123
Site 29/WQ20	10/15/2023	Incomplete	18" DRC and RRD	\$7,446
Site 30	10/15/2025	Incomplete	RRD	\$3,323
Site 31/WQ15	10/15/2025	10/15/2025	Relocate soil	\$3,323
Site 32/WQ11	10/15/2023	10/15/2023	Armor outlet	\$3,323
Site 33	10/15/2025	Incomplete	RRD	\$3,323
Site 34	10/15/2025	10/15/2023	RRD	\$3,323
Site 35/C1	10/15/2025	Incomplete	18" Culvert	\$4,123
Site 36	10/15/2023	10/15/2023	15" DRC	\$4,023
Site 37/WQ13	10/15/2025	Incomplete	Decommission crossing	\$3,323
Site 38/ WQ14	10/15/2025	Incomplete	Decommission crossing	\$3,323

**Table 3: Monthly consumer price index<sup>1</sup> for all urban consumers in the Pacific Area**

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
<b>2017</b>												100
<b>2018</b>	100.52	101.07	101.5	101.83	102.21	102.44	102.62	102.83	103.09	103.55	103.3	103.08
<b>2019</b>	103.4	103.73	104.1	104.97	105.34	105.35	105.4	105.38	105.7	106.24	106.05	105.74
<b>2020</b>	106.08	106.58	106.41	105.96	105.99	106.28	106.91	107.31	107.29	107.53	107.54	107.47
<b>2021</b>	107.68	108.26	108.95	109.95	110.73	111.75	112.3	112.49	112.71	113.53	114.1	114.45
<b>2022</b>	115.52	116.32	117.77	118.55	119.54	121.05	121.1	121.02	121.44	122.27	121.7	121.11
<b>2023</b>	122.41	122.94	123.4	124.02	124.64	125.17	125.3	125.9	126.28	126.38	125.9	125.74
<b>2024</b>	126.63	127.23	128.34	129.1	129.22	128.98	128.81	128.8	129.24	129.4	129.32	129.28
<b>2025</b>	130.22	130.94	131.69	132.34	132.7	132.83	133.01	133.29	133.72		133.46	133.31
<b>2026</b>	133.97	134.7										

**Table 4: CRMP work completion and projected costs**

Site	Treatment	October 2022 Cost	October 2023 Cost	October 2024 Cost	September 2025 Cost	February 2026 Cost
Site 01/WQ 2	Multiple (2) DRC	\$8,046	\$8,317	\$8,515	\$8,800	\$8,864
Site 02	RRD	\$3,323	\$3,435	\$0	\$0	\$0
Site 03/WQ3	18" Culvert	\$4,123	\$4,262	\$4,364	\$0	\$0
Site 04/WQ4	18" Culvert	\$4,123	\$4,262	\$4,364	\$4,509	\$4,542
Site 05/WQ5	18" Culvert	\$4,123	\$4,262	\$4,364	\$4,509	\$4,542
Site 06/WQ6	24" Culvert	\$4,423	\$4,572	\$4,681	\$4,837	\$4,873

Site	Treatment	October 2022 Cost	October 2023 Cost	October 2024 Cost	September 2025 Cost	February 2026 Cost
Site 07/WQ7	30" Culvert	\$4,723	\$4,882	\$4,999	\$5,166	\$5,203
Site 08/WQ8	18" Culvert	\$4,123	\$4,262	\$4,364	\$4,509	\$4,542
Site 09	15" DRC	\$4,023	\$4,158	\$4,258	\$4,400	\$4,432
Site 10	15" DRC	\$4,023	\$4,158	\$4,258	\$4,400	\$4,432
Site 11/WQ9	20' x 24" Extension	\$1,160	\$1,199	\$1,228	\$1,269	\$1,278
Site 12	RRD	\$3,323	\$3,435	\$3,517	\$0	\$0
Site 13	18" Culvert	\$4,123	\$4,262	\$4,364	\$0	\$0
Site 14/WQ10	18" DRC	\$4,123	\$4,262	\$4,364	\$0	\$0
Site 15	RRD	\$3,323	\$3,435	\$3,517	\$3,634	\$0
Site 16	Water bar	\$200	\$207	\$212	\$0	\$0
Site17/C4/WQ21	Decommission crossing	\$3,323	\$3,435	\$3,517	\$3,634	\$3,661
Site 18	Water bar	\$200	\$207	\$212	\$219	\$220
Site19/C3/C3.1/WQ22	Decommission crossing	\$3,323	\$3,435	\$3,517	\$3,634	\$3,661
Site 20	Remove bladder	\$0	\$0	\$0	\$0	\$0
Site 22/ST2	Remove liner	\$0	\$0	\$0	\$0	\$0
Site 23/C2/WQ16	30" Culvert	\$4,723	\$4,882	\$4,999	\$5,166	\$5,203

Site	Treatment	October 2022 Cost	October 2023 Cost	October 2024 Cost	September 2025 Cost	February 2026 Cost
Site 24/WQ17	36" Culvert and RRD	\$8,646	\$8,937	\$9,150	\$9,456	\$9,525
Site 25	RRD	\$3,323	\$3,435	\$3,517	\$3,634	\$3,661
Site 26/WQ18	30" Culvert	\$4,723	\$4,882	\$4,999	\$5,166	\$5,203
Site 27	Maintenance	\$200	\$207	\$212	\$219	\$220
Site 28/WQ19	18" DRC	\$4,123	\$4,262	\$4,364	\$4,509	\$4,542
Site 29/WQ20	18" DRC and RRD	\$7,446	\$7,697	\$7,880	\$8,144	\$8,203
Site 30	RRD	\$3,323	\$3,435	\$3,517	\$3,634	\$3,661
Site 31/WQ15	Relocate soil	\$3,323	\$3,435	\$3,517	\$3,634	\$0
Site 32/WQ11	Armor outlet	\$3,323	\$3,435	\$0	\$0	\$0
Site 33	RRD	\$3,323	\$3,435	\$3,517	\$3,634	\$3,661
Site 34	RRD	\$3,323	\$3,435	\$0	\$0	\$0
Site 35/C1	18" Culvert	\$4,123	\$4,262	\$4,364	\$4,509	\$4,542
Site 36	15" DRC	\$4,023	\$4,158	\$0	\$0	\$0
Site 37/WQ13	Decommission crossing	\$3,323	\$3,435	\$3,517	\$3,634	\$3,661
Site 38/ WQ14	Decommission crossing	\$3,323	\$3,435	\$3,517	\$3,634	\$3,661

**Table 5: Summary of cost estimates (sum of the cost columns in Table 4)**

<b>Month Year</b>	<b>October 2022</b>	<b>October 2023</b>	<b>October 2024</b>	<b>September 2025</b>	<b>February 2026</b>
Total Remaining Construction Cost	\$132,742	\$137,214	\$125,685	\$112,493	\$105,993