

VII. Cost and Benefit Analysis of EPA's Options

A. EPA Has Underestimated The Cost Of All The Options.

EPA significantly underestimated the probable total cost and cost per acre of all the options. The following comments set forth a critical analysis of EPA's cost and benefit analysis. Additional information is contained in the Appendix to these comments.

EPA based its national estimate on a project duration time of only 9 months while the more probable duration is 18 months or more. A comparison of the national costs estimated by EPA and URS are depicted below:

EPA and URS Comparison of Estimated National Cost for C&D ELG

	<u>EPA</u>	<u>URS</u>
<u>Option 1</u>		
Total Annual Cost, Billions	\$0.132B	\$0.439B
Cost per Acre, \$/Acre	Not Available	\$1,299
<u>Option 2</u>		
Total Annual Cost, Billions	\$1.891B	\$6.934B
Cost per Acre, \$/Acre	\$6,343	\$23,257
<u>Option 3</u>		
Total Annual Cost, Billions	\$3.797B	\$13.454B
Cost per Acre, \$/Acre	\$7,452	\$26,407