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Topic: Total Life Cycle Cost Analysis:

Many alternatives described in Appendix 1 (Section 6) of the draft EIS have been discarded because of an unfavorable total life cycle cost.

The June 2, 2025 OCB Memorandum made the statement that "The total lifecycle cost analysis of the (new) FRE facility has not yet been completed."

Without a total lifecycle cost analysis, why is the newly-located FRE being seriously discussed? There are no facts to show that the project is economically viable now that the cost has ballooned to an upper estimate of \$2.3 billion dollars.

And that \$2.3 billion upper estimate omitted major mitigation costs which are described as uncertainties in the draft EIS. Once the mitigation costs for these uncertainties are included, the actual upper estimated cost will be closer to \$3 billion dollars.

Therefore, this draft EIS must be postponed until the revised FRE project is shown to have a favorable cost/benefit analysis. And that means obtaining costs for all the uncertainties spelled out in the draft EIS and my previous comments.

The FRE project must be treated exactly the same way as the dismissed alternatives.