

**Economic Benefit Analysis**

**Smith Bros. Farming, Inc.**

Compliance Action	One-Time Non-Depreciable Expenditure				Non-Compliance Date	Compliance Date	Penalty Payment Date	Discount Rate	Benefit of Non-Compliance
	Amount	Basis	Date	Delayed?					
2015 Farm Evaluation	\$ 960.00	ECI	11/3/2016	N	3/1/2016	11/3/2016	11/3/2016	7.20%	\$ 522

**Income Tax Schedule:** For-Profit (Other than C-Corporation)      **Analyst:** Bryan Elder      **Total Benefit:** \$ 522  
**USEPA BEN Model Version:** Version 5.6.0 (April 2016)      **Date/Time of Analysis:** 7/14/2016 14:38

**Assumptions:**

- 1 Farm Evaluations are estimated to take approximately two hours to complete by a qualified person at a labor rate of \$120 per hour. In this case, there are four non-contiguous parcels, which would require individual Farm Evaluations.
- 2 Farm Evaluation reporting costs are adjusted using the Employment Cost Index (ECI).
- 3 Non-compliance date for each Farm Evaluation is the deadline to submit to the Regional Board.
- 4 Farm Evaluation expenses are assumed to be avoided costs and the compliance date is irrelevant.
- 5 The penalty payment date is assumed to be the tentative Regional Board hearing date.
- 6 The Discharger is assumed to operate as a for-profit entity, similar to a sole-proprietorship.