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TO: Dr. Holly Stallworth, U.S. Environmental Protection Agency (EPA)

FROM: Ed Gray, Principal, ANTARES Group Inc.

DATE: May 21, 2015

RE: Written Comments to the Science Advisory Board Biogenic Carbon Emissions Panel

The following summarizes comments by ANTARES regarding the U.S. EPA's Framework for Assessing Biogenic CO_2 Emissions from Stationary Sources (November 2014):

1. The revised framework and methodology recognizes the importance of allowing facilities to determine customized factors for the BAF equation that take into account the measures employed to ensure supply sustainability and attention to supply logistical system planning that will substantially mitigate net carbon dioxide emissions.
2. Flexibility in the framework as in comment 1 ensures that innovation and investments in resource systems planning, maintenance and monitoring are not stifled by one size fits all emissions factors.
3. Emissions analysis should focus on the "prospective" analysis - forecasting the expected changes in carbon stocks for both the specific supply shed serving the specific project use and the regional supply shed providing for all competing uses. Any good commercial feedstock/fuels supply assessment will produce the data needed for both purposes. By considering both, the facility will address the specific impacts of project development and operations and the broader regional impacts of multiple uses for the same feedstocks. The former is the specific sustainability of the project, the latter represents the general sustainability for the resource. Specific sustainability analysis only addresses the positive and negative carbon exchange characteristics of the project. For sustainably managed forest lands, the expectation is that the project case will show a net positive impact on carbon stocks and answer the question of how positive will it be. The general sustainability analysis measures the ability of the regional resource to meet all needs while preserving or growing carbon stocks. If carbons stocks are declining in the regional fiber supply shed, then even though the specific case may be positive, all users will ultimately be impacted by non-sustainable land conversion, development or forest management practices. Taken together, the combined determinations have important commercial and policy implications.
4. In regions with robust fiber producing resources, the comparison of the bioenergy project scenario use of resources to the zero removal case is highly unrealistic. A more realistic comparison is to compare the bioenergy project impacts to the impacts for competing uses of the resource (e.g., paper manufacturing or pellet fuel manufacturing).