

**Written Comments of David Garman
to the EPA Scientific Advisory Board Panel on Biogenic Carbon Emissions
January 27th Teleconference**

I again thank the distinguished members of this panel for your willingness to serve. This must be an exceedingly frustrating exercise for you.

As a reminder, I served as Assistant Secretary for Energy Efficiency and Renewable Energy, and Under Secretary of Energy at the U.S. Department of Energy. I am an advocate for the use of a wide variety of domestic energy resources—particularly underutilized carbon-friendly renewable energy.

At the Panel's public meeting in October I asserted that EPA had needlessly complicated the potential regulatory treatment of biogenic emissions. I also respectfully suggested that it was a waste of the time, talent and the credibility of the individuals on this panel to opine on a biogenic carbon accounting framework in light of the constraints that EPA had placed upon you.

You have been asked to validate a complex accounting method designed to determine, with arguably false precision, emissions factors for various "classes" of biomass, employing variables that cannot easily be measured.

You have been told that key aspects, such as the determination of regional boundaries to be used in the framework, the determination of whether "marginal" or "average" accounting should be used, and the calculation of "leakage" are *policy* questions that must remain beyond the scope of your deliberations. Yet, it is utterly impossible for you to evaluate the scientific legitimacy of the EPA's proposed accounting framework without a greater understanding of the EPA's intended approach in these crucial matters.

To make matters even worse, the absence of a comprehensive approach to greenhouse gas management and the limited regulatory options available to the EPA must inevitably result in a regulatory regime that applies exclusively to biomass energy used in stationary sources. The unfairness of this result is more of a policy issue than a scientific one, but it underscores the reality that even the very best scientific advice you can offer will inevitably fall short of rescuing bad policy.

As an advocate for the use of all of our domestic energy resources, including renewable biomass from America's working forests, I am deeply concerned that any accounting framework worthy of your scientific imprimatur will eventually be transformed by EPA into unworkable policy—and indeed, *as a justification for it*. The complex equations and formulations featured thus far in the panel's deliberations are of a sort that only a scientist or policy wonk could love. Since those who inhabit the world of commerce are disinclined toward such complexity, the likely but absurd result is that the market will eschew a renewable, domestic, carbon-friendly source of energy. It would be a travesty to do this—particularly for the presumed sake of the environment.

Because forestry stocks are stable or increasing, sequestered carbon in forest stocks are stable or increasing. This affords EPA the luxury of making the policy judgment that a categorical exclusion for biomass is justified at the present time. Because forests and carbon stocks are inventoried on an annual basis, such a policy could be revisited in the future as warranted.

For now, the best that science can offer is the satisfaction that deliberations such as yours are advancing the discussion relative to potential future carbon accounting methods—but this effort is clearly not ready for policy prime time.

I am reminded by a National Academy of Sciences panel, who, in a 1995 report (Technical Bases for Yucca Mountain Standards) essentially told the Congress and the EPA that science could not provide scientific guidance to resolve what were essentially policy issues. This was a refreshing admission for those scientists to make, and I respectfully suggest that this is a course available to you as well.

Thank you for your thoughtful consideration of these comments.