



NATIONAL COUNCIL FOR AIR AND STREAM IMPROVEMENT, INC.
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Mr. Thomas Carpenter
Designated Federal Officer (DFO)
EPA Science Advisory Board (1400R)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Sent via email: carpenter.thomas@epa.gov

Dear Mr. Carpenter:

NCASI is a non-profit environmental research organization funded primarily by the North American forest products industry. We are writing to provide comments to the EPA Science Advisory Board for its meeting on March 31, 2016 to review of the draft SAB report on an accounting framework for biogenic carbon dioxide emissions. Our comments are contained in this letter. We are also requesting an opportunity for Dr. Caroline Gaudreault to make a 5 minute oral presentation via telephone to the SAB on March 31st.

Our comments address the Panel's work in 4 specific areas:

1. temporal scales ;
2. stock-based accounting;
3. modeling approaches; and
4. baselines

1. Temporal Scales for assessing the future impacts of forest carbon policies

The Panel has correctly noted that "it is cumulative emissions over roughly a 100 year period that lead to a climate response" and "different scenarios of emissions pathways over the next several decades that have equivalent cumulative emissions over the next 100 years are likely to lead to remarkably little difference in global temperature response."

To those who feel it is necessary to reduce emissions in the near term to avoid "tipping points", the Panel explains that "reducing cumulative emissions will reduce the likelihood of crossing tipping points or

thresholds in the climate system in the future, while reducing emissions in the short run through temporary storage in forest sinks may at best delay tipping points by a few years but not reduce their likelihood in the longer term."

These findings are especially relevant to policies on forest carbon. Due to the timing of biophysical processes, market responses and warming impacts, forest carbon policies that accomplish short- to intermediate-term reductions in CO₂ emissions can sometimes result in long-term increases in atmospheric CO₂ and, according to IPCC's assessment, higher peak global temperatures. The Panel's findings, therefore, point to the importance of understanding both the near-term and long-term implications of forest carbon policies. A failure to consider long-term implications can result in forest carbon policies that ultimately result in more CO₂ in the atmosphere rather than less.

2. Stock-based Accounting

The Panel has suggested that a stock-based accounting approach has a number of advantages compared to the flow-based approach contained in EPA's draft framework report. Our experience confirms the Panel's suggestions in this area. It is important, however, to properly account for methane when using stock-based approaches - something that the Panel also highlights. This is especially significant in cases where the alternative to using biomass for energy is landfill disposal, as in the case of manufacturing residuals without alternative uses.

3. Modeling Approaches for assessing the future impacts of forest carbon policies

The Panel investigated several modeling approaches for applying anticipated future baselines and concluded that an approach that integrates economic dynamics and biophysical effects is appropriate. NCASI's familiarity with the research addressing factors that influence forest carbon stocks indicates that, for studies using anticipated future baselines, the Panel's recommendation is well founded.

At the same time, the Panel has recognized the uncertainties inherent in such modeling and has recommended that EPA identify and evaluate a set of criteria for choosing a specific model and examine the sensitivity of the Biogenic Accounting Factor estimates to the choice of the model. This is a sound recommendation and speaks more broadly to the need for considering uncertainty in applying model-based projections to the calculation of emission factors used in regulatory programs. There are, we suspect, situations where this uncertainty will lead EPA to conclude that, although the development of regulations can be informed by model-based projections, the implementation framework for regulations should focus on what is actually happening instead of what models suggest may happen. This observation is especially relevant to the selection of baseline approaches.

4. Baselines

One area where we feel the Panel has unnecessarily limited the range of policy contexts of potential interest to EPA is in its examination of baselines. The Panel continues to express concerns that "the reference point approach has important limitations and should not be the preferred approach."

NCASI's comments to the Panel have pointed out the limitations associated with both reference point and alternative fate (or anticipated future) baselines. NCASI's analysis has documented why EPA should not be precluded from using reference point baselines in situations where, for both technical and non-technical reasons, reference point baselines are best suited to meeting EPA's specific policy objectives.

We thank you for the opportunity to provide comments on this important topic.

Respectfully submitted:

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