



**Statement of Mary S. Booth, PhD, Partnership for Policy Integrity  
EPA's teleconference on Biogenic C Science Advisory Board March 13 draft  
March 20, 2012**

Thank you for the opportunity to comment. The March 13th draft report contains key improvements, specifically, the analysis and call for a biogenic accounting factor for residues. However, the draft contains issues of significant concern – in particular, the use of a 100 year timescale. This proposal is risky, indefensible, and blind to policy implications.

The 100-year timescale is risky because it disregards the need for early reductions in CO<sub>2</sub> emissions to delay reaching critical tipping points, such as methane release from permafrost. There are many scientific and economic arguments for why early action is critical, yet the SAB timescale analysis includes none of them, relying on one narrow perspective.

The 100-year timescale is indefensible because by comparing the fate of a ton of biogenic CO<sub>2</sub> versus the fate of a ton of fossil fuel CO<sub>2</sub>, the analysis obscures the key fact that biomass plants emit *more* CO<sub>2</sub> per unit energy than fossil fueled plants. The panel must develop a carbon accounting system that can evaluate the use of biomass as a Best Available Control Technology for CO<sub>2</sub> on an output basis, as employed by the Clean Air Act. Under this framework, biomass plants emit around 3,000 pounds of CO<sub>2</sub> per megawatt-hour. In contrast, a combined cycle gas plant emits 800 to 1,000 pounds per megawatt-hour. A valid comparison would thus show biomass emissions as initially three times higher; further, it would integrate all CO<sub>2</sub> emitted in the timeframe of interest under a series of yearly curves, not a single curve, which represents one year's fuel use and is only valid for a facility that operates for a single year, then shuts down.

The 100-year timescale proposal is also blind to policy implications. The Cherubini analysis shows that over 20 years, terrestrial and oceanic carbon uptake draw down fossil fuel emissions by about 40 percent. However, no one is proposing to regulate net fossil fuel emissions over an extended timeframe, at least not yet. They are counted at the stack. The panel needs to be more aware of the policy context in which they are operating, and consider what it will mean for the Clean Air Act if they produce a framework that determines that emitting three times more CO<sub>2</sub> at the stack than fossil fuels actually represents *lower* emissions, based on the vague and unenforceable promise of resequestration sometime in the distant future.

Finally, the report's recommendation that EPA consider adopting a certification system for biogenic carbon negates the report's conclusion that it is necessary to calculate baseline emissions without biomass harvesting to properly account for emissions. The report states that certification would, "*not require determining the specific size of change in carbon or greenhouse gases, just a determination of whether the system's net greenhouse gas balance is negative or not*".

This approach reverts back to the original flawed EPA framework and should be abandoned. Thank you.