

Comments by Reid Miner, NCASI, to the January 27, 2012 teleconference of the EPA SAB Panel on biogenic CO<sub>2</sub> emissions

Thank you for the opportunity to provide a few brief comments on the Panel's draft review of EPA's report. I would like to address three issues: Baselines, Spatial Scales, and Temporal Scales

1. EPA is seeking a biogenic CO<sub>2</sub> reporting convention to apply to stationary sources that will allow the Agency to implement the Title V and PSD programs. In this situation, a reference point baseline is the appropriate choice as it estimates the actual net transfers to the atmosphere at a point in time. Baselines employing anticipated future conditions are useful when examining policy choices but EPA's challenge is different than this. EPA's challenge is implementing regulations wherein sources receive limits on actual transfers of pollutants to the atmosphere.
2. The Panel appears reluctant to do the accounting at the large spatial scales that are relevant to how forest biomass is produced and used. There are several reasons for using large spatial scales. First, if the analysis is limited to the plot-scale you do not properly characterize the flows of carbon from the atmosphere into re-growing plots that will supply wood in the future. These carbon flows from the atmosphere into the supply area and the activities that influence these flows are as much a part of the biomass system as the facility that uses the biomass and should, therefore, be included in the analysis. Second, facilities source wood from entire regions so it is only by looking at carbon flows at larger scales that one begins to understand the important interactions between the market for wood and carbon flows. Third, problems such as leakage and uncertainty in carbon stocks and stock changes become smaller at larger spatial scales.
3. The Panel is correct in encouraging EPA to focus on activities that shift the level of cumulative emissions in the atmosphere in the long term. Material destined for the atmosphere "anyway" in the short-to-intermediate term, and emissions that will be removed from the atmosphere in the short-to-intermediate term, can correctly be assumed to have little impact on the peak radiative forcing the earth will experience. Focusing on the long term also presents opportunities to reduce the regulatory burden on landowners and users of biomass by allowing activities with only transient impacts (e.g. decay of logging residues) to be ignored.