

Presentation to May 23, 2012
Conference Call Meeting of EPA SAB
Panel on biogenic carbon accounting

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Three Topics

- Baselines
- Temporal scales
- Spatial scales

Matching accounting to specific needs

- The SAB Panel is correct in noting, throughout the report, that EPA will need to consider the specific practical, policy and legal considerations it faces as it develops a carbon accounting framework for the PSD and Title V programs.
 - These specifics will inform a range of importance choices
- But...

Baselines

- SAB Panel dismisses reference point baselines
- There are a number of situations where reference point baselines are appropriate
 - e.g. WRI/WBCSD GHG Protocol Carbon Footprint Standards
 - Considerable discussion of the correct baseline approach
 - Reference point selected over anticipated future

Baselines

- SAB Panel report should alert EPA to the fact that anticipated future baselines are not appropriate in all circumstances
 - SAB Panel does not yet know the specific practical, policy and legal considerations that EPA will face in deciding on an accounting framework
 - So the report should not dismiss reference point baselines out-of-hand but indicate the EPA will need to consider options - like the many other choices EPA will face.

Temporal scales

- As noted in the report, the benefits of using biomass may not be immediately apparent.
- The report and executive summary should be clear, however, in stating that the use of sustainably produced biomass to reduce societal consumption of fossil fuels, via direct substitution or via the production of low GHG-intensity products, is almost always consistent with the objective of reducing peak radiative forcing in the long run.
 - The few exceptions should not be used to obscure this important fact.

Spatial scales

- In the body of the report, various accounting principles are applied at the plot level.
- These same principles apply at the landscape level, although the calculation methods may be different.
- The importance of using landscape (or larger) level spatial scales is well illustrated in Appendix C of the report. The importance of using adequately large spatial scales should be explained in the executive summary and body of the report.

thank you