

## Comments of David Garman

I wish to thank Dr. Holly Stallworth and the SAB staff office for the opportunity to comment, and I also wish to thank the members of this distinguished panel for your willingness to serve.

My name is David Garman. I served as the Assistant Secretary for Energy Efficiency and Renewable Energy at the U.S. Department of Energy from 2001-2005, and as the Under Secretary of Energy from 2005-2007. I am appearing before you as an individual citizen and advocate for diverse sources of clean energy. I have two basic contentions:

- 1) EPA has needlessly complicated the potential regulatory treatment of biogenic emissions; and
- 2) EPA is attempting to constrain the scope of this panel's deliberation and comment.

The EPA paper "Accounting Framework for Biogenic CO<sub>2</sub> Emissions from Stationary Sources," seems to make clear EPA's intention to move toward what I believe would be a horrendously complex and hopelessly unworkable regulatory regime. Moreover, EPA is asking you to provide their approach with scientific credibility by merely inviting you to tweak their accounting framework.

I submit that it is a waste of the time, the talent, and the credibility of this panel to merely opine on alternative methods to calculate net biogenic emissions within the context of the framework EPA has provided you. Instead, I hope you will escape from this confining approach and freely question whether we have a reason to regard the combustion of biomass in general—and forest biomass in particular—as anything other than *carbon neutral* when forest stocks are stable or increasing, as they are in the United States.

Previously, the EPA and other U.S. government agencies have wisely regarded biomass combustion as *carbon neutral* in all of their GHG accounting systems. The methods and guidelines established by the IPCC and the EPA's annual inventory of greenhouse gas sources and sinks account for any conversion or net loss of forestlands (and subsequent loss of sequestered carbon inventory), and it does so in a simple, elegant and scientifically sound manner.

The impressive formulae contained in the framework document convey false precision. Attempting to account for individual carbon flows that are variable, difficult to measure, difficult to track and difficult to validate or audit may be a policy wonk's dream, but it invites a regulatory nightmare. Complexity is the enemy of effective policy. EPA has chosen complexity, and this panel should rightly ask EPA why it has done so.

A better alternative is to simply rely upon the established practice of providing for an emissions factor of zero for forest biomass, unless and until such time, if ever, national inventories signal a net loss of forest lands and an accompanying biogenic carbon imbalance. Ironically, the failure to take this established, elegant, simple approach will inhibit new markets for forest biomass, reduce marginal forest income, and create disincentives to landowners to keep their lands as working forests. Thus, the EPA's approach will encourage the conversion of forests into non-forest uses and inhibit the development of a domestic source of renewable energy.

I urge that each of you resist any attempt to constrain you to the modalities of EPA's regulatory approach, and express the willingness, on sound scientific and technical grounds, to question its very need. Thank you for your attention, and I appreciate this opportunity to comment.