

STATEMENT OF SAMI YASSA

SENIOR SCIENTIST, NATURAL RESOURCES DEFENSE COUNCIL

On the

Science Advisory Board's draft review of EPA's 2014 Framework for Assessing Biogenic CO<sub>2</sub> Emissions from Stationary Sources (August 29, 2018 Draft Report for Quality Review)

September 26, 2018

My name is Sami Yassa and I am a Senior Scientist with the Natural Resources Defense Council. NRDC appreciates this opportunity to comment on the SAB's draft for quality review. My comments today supplement our written comments jointly submitted by Clean Air Task Force and NRDC.

NRDC strongly agrees with the draft's reaffirmation that it is "scientifically indefensible to assume all bioenergy has no net carbon dioxide emissions to the atmosphere, or the reverse, that all emissions represent a net addition to the atmosphere" found on page 5.

We also strongly endorse the draft's recommendation that "biogenic carbon accounting will depend on the policy context, particularly in the selection of the time horizon and geographic scope" found on page 6.

NRDC is concerned, however, that the draft report appears to reverse the full Scientific Advisory Board's previously-stated rebuttal of reference point accounting. My colleague Jonathan Lewis at the Clean Air Task Force will speak to that issue in more detail in his presentation.

My remaining comments pertain to the report's recommendation in Section 3.4 on page 9, *requiring* a "landscape approach" to account for the impacts of biomass use on atmospheric carbon.

To begin, this Board has established in its 2012 final report that:

“merely knowing whether carbon sequestration at the landscape level has increased or decreased tells us nothing about the incremental effect that bioenergy production has on carbon emissions.” (SAB, 2012, page 4)

The SAB underscored the need to determine the DIFFERENCE BETWEEN forest carbon stored under a business as usual baseline and carbon stored under a biomass harvest scenario.

The current review draft’s rationale for the “landscape approach” appears to violate this fundamental principle.

The rationale suggests that “concurrent” or “simultaneous” sequestration across the landscape can “balance” emissions from burning forest biomass for energy. It does not acknowledge that it is necessary to assess the DIFFERENCE IN STOCKS between two scenarios. It justifies the landscape approach by considering *merely the change in a carbon stock* – precisely what the SAB warned against. This flawed rationale is found on page 11, lines 4 through 9 and is repeated elsewhere in Section 3.4.

The SAB should not support, let alone *require*, an approach based on concepts that are fundamentally at odds with foundational accounting principles. Our written comments recommend deleting the two paragraphs in which this language appears as well as the accompanying recommendation at the end of Section 3.4 on page 9.

We do not object to modeling individual baseline scenarios or biomass harvest scenarios at a *landscape scale* using biophysical models that have been demonstrated for this application broadly in the literature, which we cite in our comments. These rely on stand-level analyses that are aggregated in space to a landscape **scale** and integrated over time. We note that this landscape **scale** is vastly different from the ambiguous “landscape approach” proposed in the current draft report.