



August 6, 2015

To: The Science Advisory Panel on Biogenic Carbon Accounting  
From: Mary Booth, Director, Partnership for Policy Integrity

Our organization has followed the work of the biogenic carbon panel since its inception. Apparently the panel feels some confusion on its mandate, so I want to explain to you today why your work is important.

The current draft executive summary states that EPA has removed the policy context for the Framework. This isn't really the case. EPA stated in February that the Framework needs to assess "the extent to which the production, processing, and use of biogenic material at stationary sources results in a net atmospheric contribution of biogenic CO<sub>2</sub> emissions."<sup>1</sup>

This means that at a minimum, the framework must be useful for Clean Air Act permitting and determinations of Best Available Control Technology. Further, the draft federal implementation document for the Clean Power Plan, which was announced on Monday, states that the Framework and SAB review will "assist EPA in assessing potential qualified biomass feedstocks in federal plan applications."<sup>2</sup> That means the Framework must be able to determine net CO<sub>2</sub> emissions in terms of pounds of CO<sub>2</sub> per megawatt-hour at a particular facility, which is the currency of CO<sub>2</sub> in air permits, and the currency for CO<sub>2</sub> in the Clean Power Plan.

The Framework currently under consideration is sound, and can be adapted to convert changes in terrestrial carbon stocks to a CO<sub>2</sub> emissions rate for a particular facility. What is concerning, however, is that the Panel seems to have disappeared down the rabbit-hole of economic modeling, hardly questioning whether such modeling is necessary, or how it may distort BAF calculation. The credulity about economic modeling is reflected in the current draft of the executive summary, which praises EPA's modeling using FASOM. I believe the FASOM modeling is fundamentally flawed, and am accordingly resubmitting comments I offered in March. I encourage you to read them.

In the Clean Power Plan, EPA states that biogenic CO<sub>2</sub> benefits, like all claimed reductions in emissions under the Plan, must be "quantifiable, verifiable, non-duplicative, permanent and enforceable."<sup>3</sup> Translating this into the context of the Panel's work, this requires developing a Framework that can quantify facility emissions in a bounded way, and determine how verifiable actions may offset those emissions. However, developing BAF's by modeling large "shocks" of biomass demand whereby facility emissions are adjusted by a tangled web of hypothetical knock-on effects, some of which precede their causes, does not even come close to meeting this standard.

To reflect emissions that are directly attributable to a particular facility operating today requires counterfactual modeling using BAFs that are developed in a transparent and scale-appropriate way. As the panel finishes your work, it would be prudent to fully acknowledge the uncertainty of economic modeling and its apparent incompatibility with EPA's need to demonstrate that CO<sub>2</sub> "benefits" from bioenergy are "quantifiable, verifiable, non-duplicative, permanent and enforceable."

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<sup>1</sup> Charge and cover memo from EPA to the Biogenic Carbon Panel, February 25, 2015, page 6.

<sup>2</sup> Page 150, at <http://www.epa.gov/airquality/cpp/cpp-proposed-federal-plan.pdf>

<sup>3</sup> Page 1168, at <http://www.epa.gov/airquality/cpp/cpp-final-rule.pdf>