



March 16, 2015

Via e-mail: stallworth.holly@epa.gov

Dr. Holly Stallworth
Designated Federal Officer
Science Advisory Board Staff Office
U.S. Environmental Protection Agency

Re: EPA's *Framework for Assessing Biogenic CO₂ Emissions from Stationary Sources* (November 2014)

Dear Dr. Stallworth:

The Center for Biological Diversity ("Center") respectfully submits the following comments on EPA's revised draft *Framework for Assessing Biogenic CO₂ Emissions from Stationary Sources* ("Revised Draft Framework"), for consideration by the Science Advisory Board's Biogenic Carbon Emissions Panel ("SAB Panel").

The Center has reviewed comment letters on the Revised Draft Framework prepared by the Natural Resources Defense Council, Clean Air Task Force, and the Partnership for Policy Integrity. The Center shares the deep concern expressed in their letters about the scientific accuracy of the Revised Draft Framework.

In particular, the Revised Draft Framework continues to rely on fixed "reference point" baselines, which the prior SAB panel criticized as likely to produce arbitrary results depending on the spatial scale of analysis. The Revised Draft Framework also continues to permit lengthy timeframes for analysis that tend to hide short-term increases in atmospheric CO₂ concentrations and limit the framework's usefulness in assessing consistency with near-term climate policy objectives (such as the emissions rate reductions anticipated under EPA's proposed performance standards for new and existing power plants). The Revised Draft Framework also fails to account accurately for leakage caused by demand for bioenergy feedstocks, particularly in the forest context. Finally, the Revised Draft Framework relies on flawed modeling of both bioenergy emissions and economic responses to increased feedstock demand.

One of the greatest flaws in the Revised Draft Framework is its tendency to let users essentially determine outcomes based on their own policy preferences by providing a "menu" of options rather than prescriptions for scientifically accurate accounting. Allowing policy preferences to drive accounting results will produce outcomes even more arbitrary than those identified by the prior SAB Panel. For example, all else being equal in terms of combustion technology and feedstocks, calculation of emissions should not depend on whether a user picks a fixed "reference point" baseline in order to advance

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certain forest management policies, or rather employs a “business as usual” baseline for other policy reasons. Carbon accounting should reflect what the atmosphere actually sees, not what policymakers might wish to see.

The Center therefore joins other commenters in recommending that the SAB Panel try once again to focus EPA’s attention on the scientific problem at hand: determining, with the greatest possible degree of scientific accuracy, the near-term atmospheric impact associated with individual stationary sources of biomass emissions. This is the most policy-relevant question that the Revised Draft Framework can answer, as it has direct bearing on the Clean Air Act programs EPA must administer (including the Prevention of Significant Deterioration program, the New Source Performance Standards program, and the “Clean Power Plan” for CO₂ emissions from existing electrical generating units).

Thank you very much for your consideration of our comments.

Sincerely,

/s/ Kevin P. Bundy

Kevin P. Bundy
Senior Attorney