

From: [Davies, John \(FHWA\)](#)
To: [GHGInventory](#)
Subject: Comments on Draft Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2015
Date: Thursday, March 16, 2017 5:30:48 PM

Thank you for the opportunity to comment on the Draft Inventory Report. Below are comments from the Federal Highway Administration's Office of Natural Environment.

1. Transportation electricity consumption: (Table ES-3, p. ES-11). Given the increased penetration of battery electric and plug-in hybrid vehicles, it's surprising to see a reported decline in transportation electricity CO2 emissions (down about 10 percent between 2014 and 2015, and down over 20 percent between 2005 and 2015). The Electric Drive Transportation Association estimates cumulative U.S. sales of about 400,000 light-duty vehicles by the end of 2015, up from nearly zero vehicles in 2010. <http://electricdrive.org/index.php?ht=d%2Fsp%2Fi%2F20952%2Fpid%2F20952> . See also Transportation Energy Data Book Edition 35 Table 6.2 (2010 to 2015 sales).
2. Table 2-13: As noted in footnote 7, FHWA changed its methodology to apportion on-road and non-road gasoline consumption in its Highway Statistics 2015 document, so applying the published on-road / non-road ratios from Highway Statistics is causing a noticeable discontinuity in the Inventory's estimates between 2015 and earlier years, especially for on-road transportation. It is suggested that the 2015 on-road / non-road ratio be applied retrospectively to estimate on-road gasoline consumption for 2014 and earlier years.
3. If the Inventory estimates are adjusted to reflect an increase in on-road gasoline GHG emissions, it would be worth noting that this trend has been significantly influenced by the recent growth in light-duty VMT. Following a period of stagnation (lasting from 2009 to about 2013), light-duty increased by 1.6 percent from 2013-2014, and 2.5 percent from 2014 to 2015 (see 2014 and 2015 Highway Statistics Table VM-1).
4. Also for Table 2-13, suggest including an italicized line item at the bottom of the table showing biofuel CO2 emissions, as is done for Table 2-4.
5. P. 3-19. Might also note the recent VMT trends, especially the accelerating growth in 2014 and 2015 mentioned above.
6. Figure 3-13: orange line should be labeled % passenger *cars*.
7. Table 3-12, italicized line item: suggest including biodiesel and labeling this biofuels.

Please let me know if you have any questions.

Best,

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