

From: [Keith Forbes | Integrated Sustainability Solutions LLC](#)
To: [GHGInventory](#)
Subject: comments on the Draft Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2015
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I am providing my comment on the Draft Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2015:

For the last 25 years or so, EPA has been a leader in GHG inventory methodologies. I authored the LULUCF chapter of the EIA (DOE) GHG inventory for the U.S. for 7 years using data from the EPA and USDA/USFS, so am intimately familiar with the guidelines. EPA's methodologies have been widely adopted and integrated into IPCC guidelines for GHG inventories for all countries. EPA methods have also been used by numerous state and voluntary registries in the U.S. and elsewhere, as well as for private sector GHG reduction efforts by numerous corporations. Therefore, it is critical that EPA inventory methodologies remain based upon the best science and are transparent.

Thank you for the opportunity to comment.

Keith Forbes

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