

From: [Tyson Miller](#)
To: [GHGInventory](#)
Subject: Comments on Draft Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2015 [WARNING: SPF validation failed]
Date: Wednesday, March 15, 2017 5:35:37 PM

Dear GHG Inventory Staff,

At Dogwood Alliance, we appreciate all that the EPA does and support EPA's evolving work on carbon accounting in the new US greenhouse gas emission inventory.

- We specifically want to commend what we interpret as more accurate accounting compared to previous years. As an example, in Section 6.1 (pg 369/370), the tables show a decrease in forest carbon stocks from 1990 - 2015 and we feel that this new accounting approach shows a more accurate methodology and appreciate model updates that reflect this dynamic on the ground.

- In terms of suggestions for improving the methodology, Dogwood Alliance believes that while it is good that EPA is now counting emissions from forest fires separately, the agency should also separate out emissions from logging, as logging represents a larger share of carbon loss/emissions in forests. (See new [carbon accounting framework approach](#) published in *Carbon Balance and Management* for reference).

- We also feel that full accounting for emissions from soil disturbance due to logging using the latest methodologies is critical and are unsure whether the new methodology is integrating heterotrophic emissions

Thank you for your leadership and important work.

Sincerely,

Tyson Miller

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