



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

FEB 17 2011

OFFICE OF  
AIR AND RADIATION

Mr. Kevin Bundy and Ms. Nikki Reisch  
Center for Biological Diversity  
351 California Street, Suite 600  
San Francisco, California 94104

Dear Petitioners:

This letter is in response to your Request for Correction (RFC), on behalf of the Center for Biological Diversity, dated July 28, 2010, and received by the U.S. Environmental Protection Agency (EPA), pursuant to the *Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by the Environmental Protection Agency* (EPA IQG)<sup>1</sup>. Your request cites concerns about the objectivity of the *Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990-2008*<sup>2</sup> (the "Inventory"). These concerns will be considered for the next edition of the Inventory. As a policy-related matter, EPA also plans to engage the public and researchers in further discussions about the net effect of biomass combustion on greenhouse gas emissions, and recently published a "Call for Information" in the Federal Register<sup>3</sup> "to solicit information and viewpoints from interested parties on approaches to accounting for greenhouse gas emission from bioenergy and other biogenic sources."

EPA believes the methods used in the Inventory to estimate emissions and removals of greenhouse gases from land use activities and biomass are scientifically sound for calculating emissions and sinks at the national level. The estimates presented in the Inventory were calculated using methodologies recommended in the Revised 1996 Intergovernmental Panel on Climate Change (IPCC) Guidelines for National Greenhouse Gas Inventories (IPCC/UNEP/OECD/IEA 1997), the IPCC Good Practice Guidance and Uncertainty Management in National Greenhouse Gas Inventories (IPCC 2000), the IPCC Good Practice Guidance for Land Use, Land-Use Change, and Forestry (IPCC 2003), and the 2006 IPCC Guidelines for National Greenhouse Gas Inventories (IPCC 2006). These methods were peer-reviewed in accordance with the *Procedures for the Preparation, Review, Acceptance, Adoption, Approval and Publication of IPCC Reports*.<sup>4</sup> EPA participated in the review of these methods and believes they are based on the best available science. Preparing the Inventory in accordance with the standard methodological approaches required by the United Nations Framework Convention on Climate Change (UNFCCC) and reporting in a manner agreed to by Parties to

<sup>1</sup> Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by the Environmental Protection Agency, EPA, 2002. (67 FR 63657).

<sup>2</sup> Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990-2008, (430-R-10-006), EPA, April 2010. [http://epa.gov/climatechange/emissions/downloads10/US-GHG-Inventory-2010\\_Report.pdf](http://epa.gov/climatechange/emissions/downloads10/US-GHG-Inventory-2010_Report.pdf)

<sup>3</sup> "Call for Information: Information on Greenhouse Gas Emissions Associated With Bioenergy and Other Biogenic Sources," published in the Federal Register (75 FR 41173) on July 15, 2010.

<sup>4</sup> Procedures for the Preparation, Review, Acceptance, Adoption, Approval and Publication of IPCC Reports, IPCC, 2008 - <http://www.ipcc.ch/pdf/ipcc-principles/ipcc-principles-appendix-a.pdf>

that Convention<sup>5</sup> also ensures the U.S. emissions inventory is comparable to those of other (UNFCCC) Parties.

EPA does acknowledge your concerns about the net effect of biomass combustion on greenhouse gas emissions. The comments you submitted on April 14, 2010, are included in the 2010 Public Review Comments<sup>6</sup> that are posted on the Inventory Web site.<sup>7</sup> Although EPA did not directly address these comments in this version of the Inventory, the Agency is continuing its considerations of how to improve the Inventory. It will continue its efforts to better communicate the presentation of its emission results, and more clearly characterize approaches for this sector and the use of biomass and biomass-based fuels for energy within the international guidelines used for the Inventory. The Agency will also continue its efforts on policy-related matters in consideration of this issue beyond its efforts for the Inventory, following up on the recent "Call for Information" in the Federal Register. Note, however, that in order to comply with U.S. obligations to the UNFCCC for reporting national-level emissions and sinks in a manner comparable with other signatory countries, EPA's approach in the Inventory for calculating emissions and removals from land use activities and biomass must continue to remain consistent with the IPCC methods currently utilized in the Inventory. However, foremost to EPA is ensuring that the next iteration of the Inventory is based on the highest quality science and best available methodologies.

If you are dissatisfied with this response, you may submit a "Request for Reconsideration" (RFR) within 90 days of receipt of this response. If you choose to submit an RFR, please send your written request to the EPA Information Quality Guidelines Processing Staff via mail (Information Quality Guidelines Processing Staff, Mail Code 2811R, U.S. EPA, 1200 Pennsylvania Ave., N.W., Washington, D.C. 20460); electronic mail ([quality@epa.gov](mailto:quality@epa.gov)); or fax (202-565-2441). Additional information about how to submit an RFR can be found on the EPA IQG Web Site ([www.epa.gov/quality/informationguidelines](http://www.epa.gov/quality/informationguidelines)).

Sincerely,



Gina McCarthy  
Assistant Administrator

cc: Malcolm D. Jackson, Assistant Administrator and Chief Information Officer, Office of Environmental Information

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<sup>5</sup> See <http://unfccc.int/resource/docs/2006/sbsta/eng/09.pdf>.

<sup>6</sup> Comments Received during the Public Review Period on the "Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2008," <http://epa.gov/climatechange/emissions/downloads/10/US-GHG-Inventory-2010-Public-Review-Comments.pdf>

<sup>7</sup> <http://epa.gov/climatechange/emissions/usinventoryreport.html>