

From: [Lawrence, Deborah \(dl3c\)](#)
To: [GHGInventory](#)
Subject: Comments on Draft Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2015
Date: Tuesday, March 14, 2017 8:13:37 PM

Dear EPA,

Thank you for all the work that went into the inventory of US GHG emissions and sinks. Without this knowledge, we cannot begin to contemplate effective action to limit climate change. Without this knowledge, we cannot honor our obligations to the UNFCCC, and more importantly, to the most vulnerable on this planet and to future generations. Thank you for all you do.

It is clear to see why we must focus on electricity generation and transportation if we are to make serious strides in reducing our emissions. They are the largest contributors. I especially appreciate that EPA also allocates that electricity generation to end users, so we know where the real drivers are. When you do this, transportation looms large (about a third), but our buildings (residential and commercial combined) make up a similar portion. Only a third of our emission derive from industry. It makes sense to leave them alone as our economy struggles still to recover from the great recession; but let's take action on the other two.

It makes sense to keep in place the vehicle fleet fuel efficiency standards, not walk them back. And it makes sense to keep moving forward on the clean power plan, which will work in tandem with market forces, to continue to drive reductions in emissions from electricity that powers our houses and commercial enterprises.

I would like EPA to take a closer look at the way they account for emissions and sinks in the land use sector. Being from the southeast, I am very concerned that much of the apparent 'timber' extraction is actually much more like 'pulp' extraction in its effects. Wood is being removed to create wood pellets, not to create long-lived carbon sinks in houses. Wood pellets go straight back into the atmosphere within the year. Very different fate from wood that is actually made into timber.

In general, I would like to see EPA account for biofuels more fully—especially when they come from forests. Wood-based biofuels are not carbon-neutral. Burn wood,

emit CO₂—and emit more CO₂ per BTU of energy than many fossil fuels. I'd like to see EPA account for that.

Many thanks for all you do to protect our air, land and waters.

Sincerely,

Deborah Lawrence

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