

**From:** [Donna Lee](#)  
**To:** [GHGInventory](#)  
**Subject:** Comments on draft 2017 GHGI  
**Date:** Tuesday, March 14, 2017 12:50:33 PM

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From: Donna Lee  
Contact information: [REDACTED], [REDACTED], [REDACTED]  
Association: Climate and Land Use Alliance

Dear US EPA,

First of all, I wanted to thank you for the transparency you provide on US emissions and removals and the opportunity for public comment. The US is an important country when it comes to climate change and the data and information you generate is critical to ensuring we avoid what could be very expensive needs in the future from global warming impacts.

In general, having looked at many GHGIs across the world, the US inventory is well written and organized (many countries could usefully emulate the US documentation); the level of detail provided is also extremely useful.

I have a particular interest in the LULUCF portion of the inventory and my comments below relate to this sector. Thank you again for the opportunity to provide such comments.

Kind regards,  
Donna Lee

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Comments on US GHGI (LULUCF sector only):

- 1) The most noticeable difference in the 2017 draft is the reduction in the land sector sink. While there is a short explanation of methodological changes that have occurred that may explain the significant difference in quantification (especially F>GL and F>Settlements), it may be useful to provide a bit clearer explanation and some sense of where method changes resulted in the largest quantified changes (e.g. was it the addition of new transitions, new pools for those transitions, or changes in the model itself?)
- 2) It seems one key (new) "source" category is F>GL, but there is no explanation of what is driving this change. It may be that (spatially explicit) data is not available, but it seems to be critical for policymaking.
- 3) The GHGI states that Agroforestry systems that meet the definition of forest land are not included in the GHGI as they are not currently inventoried by the US. I assume this is simply a current gap. It would be useful to understand how significant are such systems (i.e. how big is the gap)?

Two very small issues:

- Page 6-31, line 50-51: "reduces the managed forest area by approximately 5%" - is this 5% of *total* managed forest area, or just the managed forest areas in Alaska?
- Table 6-84: Small issue, but it was really nice in this Table to have total figures for F > Settlement (in bold, followed by the breakdown by pool); in other transitions (F > Cropland, F > Grassland) there was no total, so I had to add up the various pools myself to get the totals.

**From:** [Donna Lee](#)  
**To:** [GHGInventory](#)  
**Subject:** RE: Comments on draft 2017 GHGI  
**Date:** Wednesday, March 15, 2017 2:21:05 PM

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Dear EPA,

Further to my email below, I've continued to look at the GHGI numbers, particularly the significant reduction in the total (net) land sector sink... and was concerned about the large new source related to forest conversions (in particular, forests converted to grasslands). I applaud your efforts to include these new conversions in the inventory, per IPCC guidelines... although, I wonder if it may be worth re-examining the methods you used for this new transition category? It seems rather critical, given its impact on the overall land sector sink.

Kind regards  
Donna

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**From:** Donna Lee  
**Sent:** Tuesday, March 14, 2017 10:50 AM  
**To:** [GHGInventory@epa.gov](mailto:GHGInventory@epa.gov)  
**Subject:** Comments on draft 2017 GHGI

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Contact information: [REDACTED], [REDACTED], [REDACTED]  
Association: Climate and Land Use Alliance

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