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To: Manager of the U.S. Greenhouse Gas Inventory
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The Nature Conservancy's comments on the *Draft Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2015*

The Nature Conservancy applauds the Environmental Protection Agency for its leadership and science-based approach in producing consistent annual greenhouse gas inventory reports going back to 1998 that allow us to understand trends across every sector of the economy, including the contribution to climate change mitigation made by carbon sequestration in our forests and lands. The latest of these is the *Draft Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2015*. Transparent accounting for our GHG emissions and sinks is a critical part of the solution to protect our environment and prudently manage the risks presented by climate change.

A rigorous, science-based greenhouse gas inventory is the foundation for evaluating and undertaking prudent actions to manage the very significant risks posed by climate change to our society and economy. The U.S. has long been a leader in the transparency and comprehensiveness with which it reports on its greenhouse gas emissions, and we are pleased to see that continuing here. It has done so by applying basic scientific principles of data collection: transparency, accuracy, completeness, consistency and comparability.

EPA works with every industry to do the best possible job of characterizing their emissions, and regularly updates the estimation models for each industry based on the best available science. The effort over the last few years to refine methane emissions from oil and gas emissions reporting – even in the face of controversial debates over fracking – is a good example. It is worth noting that no industry has advanced a concerted attack on EPA estimates for its emissions.

The greenhouse gas inventory is also an important part of ensuring that countries transparently report their emissions under the UN Framework Convention on Climate Change. By implementing a rigorous, science-based approach to our inventory, the U.S. sets an important model for other countries to follow and improve their own reporting. Indeed, U.S. assistance to help other countries improve their data

collection and reporting capacity has been an important complement to our own inventory process, enhancing overall global transparency.

We also appreciate the EPA's efforts to draw upon in this latest draft inventory the information and proposed guidance from recent IPCC special reports, including the *2013 Supplement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories: Wetlands*. As one of the first countries to implement this guidance, the United States has demonstrated leadership in advancing the understanding and importance of the relationship between these vital ecosystems and climate change solutions.

The United States thoughtfully spends millions each year to monitor a wide variety of potential security and public health threats, such as flu strains in wide circulation, microbes resistant to antibiotics and viruses on the Internet that may shut down our electric grid. Carefully measuring greenhouse gas emissions and their sources is part of this same effort to protect our health, jobs and environment from threats that can alter our environment and cripple our economy in ways that have the potential to cause untold damage. In sum, the inventory is a critical part of a responsible science-based insurance policy to avoid devastating impacts on the physical systems of our planet that we could not have anticipated if we failed to collect the data. We welcome this Draft Inventory, and applaud EPA and its partner agencies for their efforts to produce it.

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