

**From:** [SUSAN KRCMAR](#)  
**To:** [comments\\_EMP](#)  
**Subject:** [EXTERNAL] Comments on EMP  
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To Whom it Concerns,

**The EMP's goals are inadequate to address the immediate emergency we are facing.** While the EMP recommitts to the mandate established in the Global Warming Response Act (GWRA) to reduce greenhouse gas emissions 80% by 2050, it provides no interim milestones thus enabling reductions to be delayed. Meanwhile the consequences of climate change are occurring earlier and more rapidly than expected

Total short and long term **economic, social, health and total life cycle costs of burning fossil fuels** must be calculated, disclosed and utilized by the EMP in setting policies.

**The EMP drastically understates the global warming impact of methane released by the extraction, distribution and burning of natural gas.** Over a 20-year period, methane is 86 times more potent than CO<sub>2</sub> as a GHG. Yet the EMP (a plan for policies over the next 30 years) only considers the impact of methane over a 100-year horizon. This drastically obscures its real effect on climate change in the near term by a factor of at least two-thirds and dramatically understates the amount of methane emissions occurring today and the volume of reductions required by 2030 and 2050.

Thank you!

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