

I wish to enter this comment re the Climate Action Council's Draft Scoping Plan, with particular focus on Chapter 17. I am a retired biologist who has worked extensively in public policy in Arizona. I recently returned to NY to help care for our granddaughter. Global warming had already been a top priority to me, but with the arrival of Hannah, my feeling that we need to get to zero carbon emissions ASAP has been elevated to near-panic. I am so grateful to have moved back to my native State and find such progressive work being accomplished towards that zero carbon goal—please do keep up the awesome work!

The CAC and all other participants in this critical and ambitious process are to be commended for the effort, open-mindedness, and creativity you have all brought to bear on the Draft Plan. Thank you all for your great public service.

Chapter 17 (Economy-wide Strategies) is an especially valuable part of this plan, as it addresses economy-wide strategies to bring down emissions. This comprehensiveness is essential to reaching the emissions goals set by the Climate Leadership and Community Protection Act (CLCPA).

Being a long-time member of the Citizens Climate Lobby (CCL), I am pretty well educated on available options to reduce our national carbon emissions. CCL's conclusion, and mine, is that carbon pricing is the fastest, least complex, most effective, most progressive way to get our carbon emissions down when paired with a rebate to those least able to adjust to temporary hikes in energy prices. If you haven't seen this economic study, you might want to look at <https://citizensclimatelobby.org/household-impact-study/> to see how well such a carbon pricing plan could work for us all.

The most recent IPCC report (6<sup>th</sup> Assessment Report, Mitigation of Climate Change) also supports the significant value of a carbon price in theory:

**“Economic theory suggests that carbon pricing policies are on the whole more cost effective than regulations or subsidies at reducing emissions”**  
[13.6.3.3]

And in practice:

**“There is abundant evidence that carbon pricing policies reduce emissions. Statistical studies of emissions trends in jurisdictions with and without carbon pricing find a significant impact after controlling for other policies and structural factors. Numerous assessments of specific policies, especially the EU ETS and the British Columbia carbon tax, conclude that most have reduced emissions”** [13.6.3.3]

These are my recommendations:

- I urge you to include a carbon fee and dividend program where a fee or tax is imposed at the source of any fossil fuel generated or imported into the state, with most of the revenue returned to low- and middle-income households, and perhaps certain businesses, to offset temporarily higher energy costs.
- Such a fee should start low and rise gradually each year, to minimize economic pain during the inevitable transition to clean renewable energy sources.

Setting this fee and the increases (with adjustments allowable if the desired emissions reduction is not met) upfront will give businesses and individuals the clearest economic signals to confidently plan for their own financial decisions.

- Carbon pricing beats the alternatives you are considering because it requires much less bureaucracy to implement than regulatory approaches, is more price-certain (which helps consumers and businesses), and, along with the dividend/rebate part of such a program, directly helps those most sensitive to the initial surge in energy prices that will result.
- Finally, the establishment of a carbon pricing framework must be economy-wide (not just apply, for instance, to the electricity sector through RGGI). This is the only way to get all parts of our economy to move rapidly towards electrification, especially for buildings and transportation sectors.

Thank you for the opportunity to help shape New York's implementation of our critical climate protection goals.

Sincerely,

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