

April 12, 2021

Re: Comments Submitted to the Joint Public Hearing: To discuss and receive input from stakeholders on the Climate and Community Investment Act (CCIA)

Greetings, and thank you distinguished Senators for the opportunity to speak to you today. My name is Aaron Strong, and I am an Assistant Professor of Environmental Studies at Hamilton College, where I teach courses on climate change and do research on climate impacts, strategies for climate resilience, carbon accounting methods and climate change policy. I live where Hamilton College is located, in Clinton, NY in Oneida County, with my wife Christina and our three little kids – Caleb, Madeline and Zoe, aged 6, 4, and 2. It's been a fun pandemic. I am proud to be represented by Senator Rachel May.

You will have heard and you will hear today from many stakeholders today about why climate justice and a just transition are important, about why we must make polluters pay for the damages that anthropogenic greenhouse gases and air pollutants from fossil fuel combustion are causing in our communities, and about the many benefits of strong investment the renewable energy systems that will power our decarbonized future.

In my comments to you, I want to offer you my perspectives as someone who has been studying climate policy implementation for over a decade around the country. In particular, I have spent a lot of time studying California's climate policy roll out, which has primarily relied on an economy-wide Cap and Trade Program with Compliance Offset credits. From 2013-2015, while I was conducting my doctoral research at Stanford University, I worked with the California Air Resources Board's Technical Working Group developing administrative rules for offset protocols that were to be used under their Cap and Trade Program. In analyzing and assessing the Air Resources Board's approaches to implementing California's signature climate law, my colleagues and I learned a lot about and published papers on state-level carbon price management and implementation. Today, I want to relay some of those lessons learned in the context of the CCIA.

First, why must we do this? The 2018 IPCC Special Report on Global Warming of 1.5°C gives us a decade to reduce emissions by 45% by 2030 and to net-zero by 2050 if we want to avoid truly catastrophic warming. This is the state of the science. And it has led, rightly so, to widespread proliferation of 2050 net zero targets, including here in New York. In 2019, New York State passed a new law – the Climate Leadership and Community Protection Act (CLCPA) – which sets a goal of 100% emissions reductions below 1990 levels by 2050 – a goal appropriately lauded for being aligned with the best available science.

So, if we got the CLCPA, didn't that address climate change? Is the CCIA needed? The Climate Action Council has been hard at work developing the Scoping Plan to move the targets of the CLCPA forward. In particular, the CLCPA sets codified targets for renewable electricity deployment in the State as we seek to reach our zero-carbon goal for electricity – which by the way President Biden is pursuing aggressively nationally. These targets and the Scoping Plan will move us forward are

moving us forward. Electrification is happening with incentives for EVs. We are putting up wind and solar. Old farmlands are getting reforested and working farms are storing more carbon in their soils. Now I want you to take a deep breath. Close your eyes if you like. Now imagine every furnace, every boiler in every basement of every house in New York State. Imagine every pick-up truck driving on every state highway. Imagine every child being picked up from every school. Imagine every old farmhouse with every gas range on uneven floorboards in the kitchen. Imagine every rural diner, with its lights on in the misty morning. The challenge of decarbonization in way that works for all of New York is simply monumental. We have the technology, we have the solutions, we know we can electrify, and we know we can create great jobs while doing it, but this shift is simply enormous.

The text of the CCIA bill before you reads, *“Without adequately devoting state resources and personnel, the outlined emissions reductions and electrification goals will not be realized in the target timeframe. Pursuant to the CLCPA, the state has less than 30 years to fully transition the 10th largest economy...”*

From my time working in and studying California’s approach, of all our findings, I want to share two key ones. First, the Air Resources Board, while working hard, was thoroughly underprepared and understaffed for the detailed level of work to administer the cap and trade program to ensure its effectiveness. They tried to rely on consultants to quickly analyze key program elements, but this led to significant challenges. Ensuring the environmental integrity of carbon pricing systems and the technical details of emissions reduction calculations requires enormous amounts of work and detail at every, single turn. They say there is no silver bullet for climate change. And there isn’t. But one thing that means is that the details of each consideration are essential. Otherwise perverse incentives abound and what is at risk is the very integrity of the law itself. The second lesson learned is relates to a refrain we hear a lot. There is no climate action without climate justice and there is no climate justice without racial and social justice. What do those mean? It means that an effective carbon pricing policy – whether a fee or otherwise – cannot work if there is not a concerted and dedicated focus on how the resources generated are allocated. California’s cap and trade program and proposed bills in Washington and Oregon regularly failed to address considerations of climate justice. Getting this right is not just politically expedient, it is necessary for achieving the ambitious goals set out in the CLCPA.

So, is the CCIA the right way to do it? Yes, it is. Without a codified in law carbon fee like the one proposed in the CCIA, the true costs of climate pollution are not internalized in the economy. But perhaps even more importantly, and the smorgasboard of promulgated regulations to implement the CLCPA’s goals will be strongly unlikely to be effective without a dedicated committed focus to steering decarbonization in New York. The promise of the CLCPA and the promise of thriving, sustainable communities around our state, from Long Island to the Adirondacks, from the Hudson Valley to the shores of Lake Ontario, from the western Mohawk Valley to Queens, the promise for my children’s future, cannot be realized without the CCIA.

Sincerely,



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Note: *The views presented here are those of the author alone, presented in his expert capacity, and do not reflect the views of Hamilton College or the Board of Trustees of Hamilton College*