

**Public Petition to New York State Department of Environmental Conservation
Setting a Moral and Ethical Discount Rate for Computing the Social Cost of
Carbon to Evaluate Damages from Greenhouse Gases
November 2020**

- **WE**, the undersigned, represent one of many Faith-based communities in New York State. We believe that setting the correct discount rate for computing the Social Cost of Carbon is a profoundly important moral and ethical choice. We petition the New York State DEC to use moral and ethical reasoning rather than financial reasoning when it issues public guidance on the correct discount rate to be used in the calculation of the social cost of carbon and other green-house gases. Our petition is based on beliefs held by our communities of Faith as well as our understanding of current science on climate change. We explicitly reject financial reasoning as an adequate basis for setting the discount rate for damage-based assessments of carbon dioxide and other greenhouse gases.
- We believe that the Golden Rule, “Do unto others as you would have them do unto you” applies to future generations. Therefore, when evaluating the trade-off in utility between the present and future generations for the purpose of assessing damage from greenhouse gas emissions, ***zero is the morally and ethically correct discount rate to use to begin computing the social cost of carbon.***

This Petition was Created, Signed, and Endorsed by
Delmar Presbyterian Church
Delmar, NY 12054

This petition was endorsed by a vote of the Session of Delmar Presbyterian Church on November X, 2020.

Karen Pollan, Pastor

Clerk of Session

Note: Written comments on the Draft Value of Carbon may be submitted by mail or email until 5 p.m. Friday, November 27, 2020 to Jason Pandich, NYSDEC Office of Climate Change, 625 Broadway, Albany, NY 12233-1030, (518) 402-8448, E-mail: climateact@dec.ny.gov. Include "Comments on the Value of Carbon" in the subject line of the email

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WE BELIEVE:

- Creation is a Divine gift.
- All Humanity has been charged to serve as stewards of this Divine gift.
- We are morally obligated to preserve and pass on this Divine gift to future generations.
- Environmental Justice requires that we not damage this Divine gift to meet our current consumption needs.
- Social Justice requires that we not place the burdens of a damaged environment on others living now or at any point in the future
- The Golden Rule, “Do unto others as you would have them do unto you” applies to future generations. Therefore, when evaluating the trade-off in utility between the present and future generations for the purpose of assessing damage from greenhouse gas emissions, ***zero is the morally and ethically correct discount rate to use to begin computing the social cost of carbon.***

WE UNDERSTAND:

- The current scientific consensus as summarized in the Intergovernmental Panel on Climate Change (IPCC) reports is that current emissions of carbon-based and other greenhouse gases will lead to dangerous and unacceptable future rises in atmospheric temperature and sea level as well as multiple adverse impacts on bio-diversity, species survival, and the viability of our sustainable environment—all damages that our generation inflicts on future generations.
- A suite of science-based economy-environment simulation models are the best available tools for more precisely forecasting the impacts of CO₂ and other greenhouse gas emissions.
- CO₂ and other greenhouse gas emissions are environmental pollutants that create negative economic externalities, notably far into the future. As with all other negative externalities, the consumer-facing price signal should encompass the full costs of such negative externality to secure an efficient market-based distribution of goods and services.
- Under current policies, fossil-based fuels are over-consumed because the full costs of future negative externalities are not fully integrated into their price of consumption.
- Guidance issued by the New York State DEC on the appropriate discount rate to compute the social costs of greenhouse gases must trade-off utility of our generation with that of future generations who are living with damages caused by our generation.

WE REJECT:

- We explicitly reject Return on Investment (ROI) as an adequate basis for setting the discount rate for computing the social costs of carbon-based greenhouse gases when the purpose is to evaluate inter-generational trade-offs in utility caused by damages imposed on the future by our generation. We recognize that Return on Investment (ROI) is an adequate, indeed preferred, basis for setting discount rates when evaluating the costs and benefits of both public and private capital projects and other projects that may involve financial investments, penalties or fees. However, the assumptions that undergird ROI-based analyses do not align well with analyses with the purpose of comparing and assessing inter-generational shifts in utility based on environmental damages.