

California Habitat Conservation Planning Coalition

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Chair Nichols and Board Members
California Air Resources Board
1001 I Street
Sacramento, CA 95812

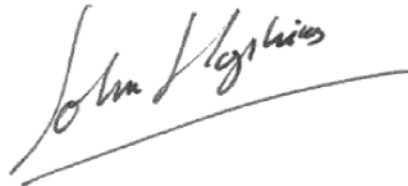
Dear Chair Nichols and Members of the Air Resources Board:

We are very pleased to learn of the release of the Proposed Final Regulation to Implement the California Cap and Trade Program and appreciate the opportunity to comment. I provide these comments on behalf of the California Habitat Conservation Planning Coalition, a state-wide coalition whose participants include local government entities, NGOs and businesses who are preparing and implementing large-scale habitat conservation plans throughout California.

As identified by the California Natural Resources Agency Climate Adaptation Strategy, as well as the Economic Allocation Advisory Committee report, it is critical to dedicate funding to help our natural systems adapt to climate change. Investment of allowance value for this purpose will protect the vital carbon sequestration and climate regulation functions of our natural lands and the critical role they can play in buffering our communities from the worst impacts of climate change.

We ask that the Air Resources Board incorporate in the regulation specific language identifying ecosystem adaptation, including Natural Community Conservation Plans (NCCPs), as a recommended use for allowance value. NCCPs plans are prepared under state law by local jurisdictions and special districts, in partnership with stakeholders and state and federal wildlife agencies. They are being implemented or prepared in many counties across the state. By providing for systems of large-scale habitat preserves across altitude gradients, connected by wildlife corridors, NCCPs are a major mechanism allowing animal and plant species to adapt to climate change and assisting carbon sequestration. In addition, by supporting smart growth objectives, they help to reduce greenhouse gas emissions. NCCPs also provide a wide range of ecosystem services vital to the health of human communities. Development of the NCCP preserve systems require large amounts of funding over a multi-decade timeline. Use of some of Cap and Trade program allowance value will be leveraged greatly by developer funds and by public conservation funds.

Sincerely

A handwritten signature in cursive script, reading "John Hopkins", written over a horizontal line.

John Hopkins, Ph.D.
Director
California Habitat Conservation Planning Coalition.

