



December 11, 2009

Chairman Larry Goulder and Committee Members
Economic and Allocation Advisory Committee
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Allocation Draft Recommendations

Dear Chair Goulder and Committee Members,

Audubon California, Defenders of Wildlife, and The Nature Conservancy thank the Economic and Allocation Advisory Committee (EAAC) for dedicating extensive time and expertise to advise the California Air Resources Board (ARB) on cap and trade allowance allocation.

Our organizations have a long-standing and abiding interest in the stewardship of our state's natural resources and the human communities that depend on them for essential health and well-being. We are gravely concerned about how climate change affects our state's natural resources and commend EAAC for recognizing in its December 9, 2009 Draft Recommendations to the California Air Resources Board the importance of natural systems climate adaptation and its significance in the AB 32 context.

EAAC's recommendation that ARB devote a "significant share of allowance value" toward adaptation and environmental remediation represents a thoughtful and critical recommendation that is consistent with AB 32's purpose to provide global warming solutions that protect public health, maximize environmental co-benefits, and achieve GHG reductions.

We appreciate the opportunity to comment and look forward to continued work with EAAC and ARB to ensure that the state's natural resources are protected from climate change.

Thank you for your consideration of our comments.

Sincerely,

Dan Taylor
Audubon California

Kim Delfino
Defenders of Wildlife

Louis Blumberg
The Nature Conservancy