

June 2, 2009

California Energy Commission
Docket Office, MS-4
Docket No. 09-IEP-1P
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DOCKET	
09-IEP-1P	
DATE	<u>JUN 02 2009</u>
RECD.	<u>JUN 02 2009</u>

Re: California Energy Commission (Energy Commission)
Docket No. 09-IEP-1P: Written Workshop Comments of
Southern California Edison Company (SCE) On
Terrestrial Carbon Sequestration Methods

To Whom It May Concern:

Southern California Edison (SCE) appreciates the opportunity to provide comments regarding the potential of terrestrial carbon sequestration methods as options for climate change mitigation. SCE in its continuing commitment to leadership in environmental excellence, has or plans to implement many of the practices recommended in the workshop. Our experience leads us to make the following comments in hopes of helping the Energy Commission institute the best practices in Forest Management.

SCE agrees with the California Department of Forestry & Fire Protection in their emphasis on maintaining other segments of ecosystem functions in favor of another segment such as carbon sequestration. Ecosystem health and carbon storage are not mutually exclusive; in many cases they are mutually beneficial. In addition, with active management, the forests of California, both public and private California forests, cannot only meet the goals of the AB 32 Scoping Plan¹ but could also provide even higher levels of carbon sequestration. Currently, much of California's forested lands are under managed. With aggressive actions the stated targets can be surpassed. Reduction of fuels, increased growth rates and ecosystem health all quickly add to the amount of carbon which can be sequestered.

The Proposed Scoping Plan includes a specific list of actions if included in a forest management program will improve long-term carbon sequestration. SCE feels the following "Recommended Actions" should be emphasized;

- Harvesting of all tree sizes though active forest management
- Using wood products for building construction instead of steel and concrete
- Using market forces (e.g. incentives) rather than command and control to promote change

¹ Proposed Climate Change Scoping Plan Appendix Vol.1 pp C-165 - C171

- Generation of electricity from biomass

In SCE's opinion, two major opportunities exist for immediately increasing the carbon sequestration potential of California forests; near-term sequestration and afforestation and reforestation. Near-term sequestration can be achieved through the removal of the billions of tons of small diameter trees that have no current value unless used for electricity generation. Use of this resource would support achieving the 20% biofuels goal of Executive Order # S -06-06.² Regrettably, this biomass is now providing fuels for the catastrophic fires now occurring in the State (see Fuels Management).³

Long-term carbon sequestration from afforestation and reforestation includes the establishment of a forest in:

- areas where the preceding vegetation was not forest
- areas that were once forested areas but have had less than 10% tree canopy cover for a minimum of 10 years.
- areas that were harvested and burned over

Tens of thousands of acres exist in California that meet these criteria.

The following recommendations pertain to specific reduction opportunities listed in the Proposed Scoping Plan.

Forest Management

The practice of reducing the numbers of trees per acre results in a significant increase in growth of the remaining trees. This can only be accomplished through active forest management. The dimension wood products resulting from harvesting and conversion further store carbon for many years. The use of prescribed fire is an additional example of forest management. While burning will increase short-term emissions, the benefits of the practice are represented by increased tree growth (carbon storage) and enhance wildlife. Together, these considerations make management fire essential to a balanced and productive ecosystem. In addition, expanding riparian areas⁴ which can not be entered,⁵ reduces the ability to manage the area. This will essentially increase the factors (e.g., old decayed vegetation) that are detrimental to carbon storage.

The Proposed Scoping Plan recommends "optimization of rotation age" as a method to improve timber stands. SCE is not aware of any uneven aged timber management systems that include "rotation age" as a measurement. We do not feel this is an appropriate recommendation. SCE does recommend providing incentives to forest landowners so they grow trees longer, increasing average stand diameters. This will increase the carbon storage potential. The incentive can be cap and trade offset dollars (voluntary or regulated). Getting paid to grow trees provides proper market signals to participants to pursue desired actions.

² Executive Order #S-06-06 calls for 20% of RPS energy to come from biopower in the years 2010 and 2020

³ Proposed Climate Change Scoping Plan Appendix Vol.1 p. C-170

⁴ Areas relating to the natural course of water – along streams & lakes and within meadows and wet areas

⁵ California Forest Practice Rules Section 953.7

Fuels Management

Finally, SCE recommends initiating some form of long-term commitment for active forest fuel management programs. Natural reproduction can produce over 100,000 trees per acre not counting brush and herbaceous species. Areas treated by harvesting and management quickly become overgrown and must be treated on a regular basis. The long term commitment will facilitate the long term investments necessary for sustained emission reductions.

As always, SCE appreciates the opportunity to participate in the IEPR process. SCE would also like the opportunity to support the Energy Commission in its work with the Interagency Forestry Working Group as deemed appropriate. If you have any questions or need additional information about these written comments, please contact me at 916-441-2369.

Very truly yours,

/s/Manuel Alvarez

Manuel Alvarez